

The Staff of the Missouri Public Service
Commission,

Complainant,

v.

Aspen Woods Apartment Associates, LLC, and
National Water & Power, Inc.,

Respondents.

Case No. WC-2010-0227

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and respectfully states the following to the Commission:

4. Regarding the suggestion of stakeholders, the Staff provides the list of apartment contacts originally attached to its December 31, 2010 Joint Report on Similarly Situated Apartment Complexes. As originally noted in that filing, the Staff obtained contract information

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from National Water & Power, Inc., (NWP) through discovery and produced Attachment A hereto. The Staff has not made any allegations regarding the operations of these additional complexes (other than those of Aspen Associates/the Madison Group) as public utilities.

5. Another potential resource for notice is the National Apartment Association's (NAA) Exhibit A attached to its October 19, 2010 Application To Intervene. The NAA's exhibit lists its Missouri members by name, but does not provide further contact information. For convenience, the Staff has attached the NAA's list hereto as Attachment B.

6. Presumably the NAA has contact information for each member it lists. Should the NAA argue it is prohibited from providing customer contact information to the Commission for whatever reason, the NAA could provide notice of the investigatory dockets to its members as it intervened in this matter on their behalf.

7. The Staff notes that the Commission's notice in the investigatory dockets directs notice to the various apartment associations throughout Missouri as listed in the NAA's Application to Intervene, Paragraph One (1).

8. The Staff would be remiss not to mention the necessity of notifying manufactured housing associations and owners of mobile home communities in Missouri. The Staff has found a website listing Missouri Manufactured Homes Association members with contact information at www.mmha.net/mmha/Members.aspx. In addition to this resource, the Staff found a website that proclaims to lists all of the manufactured housing and mobile home communities in Missouri by city. The Commission can access this resource at www.mobilehome.net/communities/mo.

9. Apart from searching the internet or scanning the regional phone book, the Staff is unable to provide any further suggestions on a comprehensive list of stakeholders that should receive notice of this workshop.

WHEREFORE, the Staff submits its *Suggestions For Notice*.

Respectfully submitted,

/s/ Jennifer Hernandez

Jennifer Hernandez
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above was served upon the attorneys/parties of record via electronic mail to Lowell D. Pearson, attorney for Aspen Woods Apartment Associates, LLC, at lowell.pearson@huschblackwell.com; Craig S. Johnson, attorney for National Water & Power, Inc., at cj@cjaslaw.com; Paul A. Boudreau and John J. McDermott, attorneys for the National Apartment Association at paulb@brydonlaw.com and jmcdermott@naahq.org; and the Office of the Public Counsel at opcservice@ded.mo.gov this 21st day of January 2011.

/s/ Jennifer Hernandez