

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

AUDIO RECORDING
THE STATE OF THE MISSOURI PUBLIC SERVICE COMMISSION
VS.
I-70 MOBILE CITY, INC., dba I-70 MOBILE CITY PARK

CASE NO. WC-2022-0295

JUNE 7, 2023

(Due to the quality of the recorded media, portions were unable to be transcribed and include inaudible portions. The transcript may also include misinterpreted words and/or unidentified speakers. The transcriber was not present at the time of the recording; therefore, this transcript should not be considered verbatim.)

TRANSCRIBED BY: MELISSA LANE

1 (Silence in audio.)

2 THE COURT: Okay. Kayla, if you want to go
3 ahead and hit record.

4 KAYLA KLIETHERMES: Just started it.

5 THE COURT: Okay. We will go on the
6 record. Good afternoon. It is now 1:30 p.m.,
7 June 7th of 2023. The commission has set aside this
8 time today for a motion hearing in the matter of the
9 staff of the Missouri Public Service Commission,
10 complainant, versus I-70 Mobile City, Incorporated,
11 doing business as I-70 Mobile City Park, respondent.
12 And this is case number WC-2022-0295, and the motion
13 hearing today is on the motion to compel answers to
14 certain data requests and I-70 Mobile Park's
15 opposition thereto.

16 Because of the court reporter shortage,
17 we've had difficulty scheduling court reporters. Are
18 there going to be witnesses for this hearing?

19 MS. KERR: No. I don't have any.

20 MS. BELL: I don't have any witnesses.

21 THE COURT: Okay. What I'm going to do is,
22 we are recording this hearing and that recording will
23 then be transcribed; okay?

24 MS. KERR: Okay.

25 THE COURT: All right. My name is John

1 Clark. I'm the regulatory judge presiding over this
2 hearing today, if I didn't say that already. And I'm
3 going to ask counsel to enter their appearance for the
4 record.

5 MS. KERR: My name is Carolyn Kerr, I'm
6 counsel for the Public Service Commission.

7 THE COURT: Thank you, Ms. Kerr.

8 And on behalf of I-70 Mobile City Park?

9 MS. BELL: And Stephanie Bell with Ellinger
10 Bell on behalf of I-70 Mobile Homes, and I've also got
11 Annaleigh Hobbs, who is a law student at Mizzou who is
12 joining us on the call as well. Thank you.

13 THE COURT: Okay. That is fine. Hope she
14 enjoys this proceeding.

15 Okay. Is there anything I have to take up
16 before we go into arguing the motion? Are there any
17 preliminary matters, staff?

18 MS. KERR: I don't think so.

19 THE COURT: I-70 Mobile City Park.

20 MS. BELL: Your Honor, I just wanted to
21 make sure you received the five exhibits that I
22 e-mailed over this afternoon.

23 THE COURT: I received a dropbox that I was
24 unable to access, but then you had sent over -- it
25 looks like one, two, three, four -- and a -- yes. I

1 have them, and it appears that I can access those.

2 MS. BELL: Okay.

3 THE COURT: So...

4 MS. KERR: I was able to access them as
5 well.

6 THE COURT: Okay. All right. It is
7 staff's motion, and since no party is presenting,
8 staff, you can go ahead with your argument.

9 MS. KERR: Thank you.

10 Staff filed this motion to compel answers
11 to certain data requests to tie up some final loose
12 ends in this case. We're trying to get as much
13 information as we can to adequately respond to I-70
14 Mobile City Park's motion for summary determination
15 and finalize discovery.

16 Unfortunately, I-70's failed to delay or
17 refuse to proceed certain requests and documents
18 making this motion necessary. We've tried getting
19 this information multiple times in many different ways
20 without filing anything with the commission, but as we
21 discussed and made clear in our discovery conference
22 back in March and in my written motion, we've had
23 little success. A motion does not even ask for much
24 more information. It actually asks for I-70 to do
25 what they're required to do and obligated to do which

1 is to update information and answer discovery
2 requests.

3 In my motion, I asked for updated responses
4 to five DRs. Since the filing of my motion, back in
5 April, counsel for I-70 actually responded with
6 updates to two of them. Specifically DR numbers 19
7 and 20 on April 27th.

8 So we -- so we're here today three months
9 later in June, only asking for updates to three DRs,.
10 Specifically DR numbers 1442 and 44.

11 THE COURT: 1442 and 44?

12 MS. KERR: Correct. Originally, DR number
13 14 asked for an explanation of -- asked for an
14 explanation of the billing process for water and sewer
15 service provided to I-70 tenants and for five years of
16 customer bills. In July of '22, I-70 only produced
17 five documents. A sample bill, a billing history for
18 three months of 2020, a software ledger from a billing
19 program, and one showing water usage for October 2020
20 to June 2021, and a summary of I70's billing and
21 payment of utility service from 8/2020 to June 2021.
22 Their argument was a five years of documents was
23 overly broad and burdensome. And that the staff and
24 commission doesn't need to see all the bills to
25 determine whether I-70 is engaging in the unlawful

1 provision of water and sewer -- sewer services to the
2 public for gain. I-70 is making the relevancy
3 determination for the commission as to what documents
4 you need to see to make your legal conclusion. My
5 motion to compel, however, narrowed what staff was
6 asking for to copies of bills dated July 1st, 2022 to
7 the present. Basically, 11 months of bills instead
8 of five years of bills. We agree five years of bills
9 are a lot of documents, so we decided to narrow our
10 motion to ask for information about what I-70 Mobile
11 City Park is doing now. What is their current state
12 of business? That question is very relevant to the
13 question before the commission, and I-70 has a duty to
14 provide the staff with that information and fully and
15 completely answer DR number 14. At least the updated
16 request which is to provide copies of all customer
17 tenant bills for water and sewer services dated
18 July 20th -- July 1st, 2022, to the present. And
19 because they answered DR numbers 19, and 20 we know
20 that's -- that's 56 tenants, 56 water bills for water,
21 56 bills for sewer, and then with regard to DR number
22 42, that DR asked for copies of all water bills I-70
23 received from the public water district for the past
24 five years. Staff wanted to see how much I-70 was
25 being billed by the water company before calculated

1 the bills it sent out to its tenants, basically to see
2 what the gain was. The markup was between what they
3 pay the water company and what they charge their
4 customers. In July '22, I-70 responded that they
5 didn't -- it didn't have any bills to calculate tenant
6 bills, but nevertheless, attached one year's worth of
7 water bills from Bates City, Missouri, June 2020 to
8 June 2021. Again, I-70 argued that five years of
9 information was overbroad and burdensome and that one
10 year's worth of bills was sufficient information for
11 staff and the commission. Again, my motion to compel
12 narrowed the request for water bills to -- to the year
13 July 1st, 2022, to the present. It's not I-70's place
14 to determine what's relevant or sufficient for the
15 commission to make a decision. Staff asked for the
16 information in a DR in accordance with the rule. The
17 information requested by staff is relevant. Staff is
18 entitled to get the documents requested, and I-70 has
19 a duty to provide the staff with that information and
20 fully and completely answer DR number 42, at least the
21 updated request which are copies of all water bills.
22 I-70 received from the public water district or Bates
23 City, wherever it's getting its water dated July 1st,
24 2022 to the present, and finally, my original DR44 or
25 the staff's original DR44 asked for copies of all

1 lease agreements or contracts between I-70 Mobile City
2 and its tenants that were in effect in July of 2022.
3 The date that DR was issued. I-70 sent no actual
4 leases or contracts in response to that DR. Instead,
5 it referred staff to copies of sample arguments it
6 provided in DR number 16 and objected to the DR saying
7 the request was overbroad, burdensome, duplicative,
8 and cumulative. Again, I-70 decided that relevancy of
9 the information for the commission and the staff for
10 itself when it failed to answer and provide the
11 documentation. Again, that's not the parties' role in
12 this case. The judge and the commission determine
13 questions of law, i.e., relevancy of facts to the law,
14 not the complainant, not the respondent.

15 To date, no copies of leases between the
16 actual tenants and I-70 have ever been provided to
17 staff as requested by the language of DR number 44.
18 Staff is entitled to copies of these documents.
19 They're relevant to the question of whether I-70 is
20 providing water or sewer or utility service to its
21 tenants for gain and are likely to lead to discovery
22 of admissible evidence. The language of the lease
23 documents may state how or give information about how
24 the tenants are billed for their utility service.
25 Staff does not know that because I-70 has chosen on

1 their own to not give the staff the requested
2 documents. I-70 doesn't have the right to make that
3 relevancy determination. Because I-70's response to
4 DR number 44 was insufficient and requires a full and
5 complete answer, I-70 has a duty to provide the staff
6 with copies of those lease agreements or contracts
7 between I-70 and its tenants that are currently in
8 effect.

9 According to I-70's most recent response to
10 DR's 19 and 20, like I said earlier, there are 56
11 water and sewer tenants at the I-70 Mobile City Park.
12 Therefore, there should be 56 lease agreements.
13 That's 56 bills for water and sewer services for the
14 past 11 months. I don't think that's burdensome or
15 overbroad. That's information that's requested --
16 is -- information commonly requested to determine
17 whether an entity's operating as a utility.

18 The central issue in this case is whether
19 I-70 is providing water and sewer services to the
20 public for gain and whether it's acting as a public
21 utility. Those documents are directly relevant and
22 will likely lead to the admission of evidence that
23 will answer those questions. Therefore, I-70 should
24 be compelled to provide the documents to staff without
25 further delay. Thank you.

1 THE COURT: Thank you.

2 I'm going to ask you a few questions now.

3 MS. KERR: Sure.

4 THE COURT: Some of them I think I know the
5 answers to, but all the same, I want to keep the
6 record as clear as possible.

7 MS. KERR: Sure.

8 THE COURT: Now you indicated as to DR14
9 that the original request was for five years' worth of
10 bills and the commission -- or not the commission, I'm
11 sorry, staff paired that back to request for -- for
12 just shy of one year's worth of bills; is that
13 correct?

14 MS. KERR: Right. July 1st, 2022, to the
15 present.

16 THE COURT: Okay. And is that -- that same
17 thing is true for DR42 which would be bills to I-70
18 from the -- either you'd indicated the public or water
19 district or Bates City, and you're unsure as to which
20 at this point.

21 MS. KERR: Yes. I -- yes.

22 THE COURT: And was that, that was also
23 paired down from a five-year request?

24 MS. KERR: Yes.

25 THE COURT: Okay. And in a DR44 which

1 requests the tenant leases, was that -- was that also
2 for all leases for five years or was that paired to --
3 down as well?

4 MS. KERR: No. That had asked for current
5 leases.

6 THE COURT: Current only.

7 MS. KERR: Yes.

8 THE COURT: Okay. I believe you said that.
9 I'm sorry, I didn't --

10 MS. KERR: That's okay.

11 THE COURT: Now, why do you believe -- why
12 do you believe that these bills will lead to
13 admissible evidence?

14 MS. KERR: Well, it will show if -- the
15 bills might show what -- if there's any extra charges
16 added to the water or the sewer bills whether there's
17 any extra fees. It'll show what -- it might show
18 whether the -- the rent is charged separate from
19 the -- the water or the sewer charge. You don't know.
20 What we -- were given of sample leases that may or may
21 not be used currently. We don't have -- we don't know
22 what's actually being used. And to look at what's
23 actually being used might let us know what -- what
24 I-70's actually doing.

25 THE COURT: Okay. In regards to DR42, same

1 question, why do you believe that bills from the
2 public water district or Bates City would lead to
3 admissible evidence?

4 MS. KERR: Well, depending on what the bill
5 is from the water district, and what the bills are
6 that the -- the tenants are paying, you know, is there
7 a -- an added fee that the tenants are paying in
8 addition to what their -- what is actually being
9 charged for water? For example, is water -- is a
10 charge of water \$50, and then the tenants are being
11 charged \$60? What is that extra \$10 for? Is that --
12 that would go to whether I-70's charging extra and
13 obtaining a gain for that, you know, is acting as a
14 utility because they are charging extra for the
15 service for water service. Or for sewer service. But
16 we don't know that without looking at the bills.

17 THE COURT: Okay. And same question in
18 regards to the leases, how do you believe that those
19 are going to lead to admissible evidence?

20 MS. KERR: Well, the leases might show --
21 there might be some language in the leases that talk
22 about how they're going to be billed for utilities,
23 whether they're going to be billed extra for -- for
24 water or sewer, whether they're going -- whether their
25 utilities are going to be charged separately how

1 they're -- how they might be responsible for -- for
2 each charge that's -- that's part of their rent.

3 THE COURT: Okay. Now, I appreciate that
4 staff has paired these down, and when I'm faced with a
5 question of whether or not something is overly broad
6 or whether it is burdensome, I generally ask myself
7 what is a sufficient level of -- of discovery to
8 accomplish what it is that the party is trying to
9 accomplish. Is it staff's belief that this is the
10 minimum -- the minimum answers to discovery that would
11 be sufficient for those DRs?

12 MS. KERR: I think this would show that --
13 I think this would show enough to see how they've been
14 acting. I think a year would -- would give a good
15 snapshot.

16 THE COURT: Would six months give a good
17 snapshot? You may not know the answer to that.

18 MS. KERR: I -- I don't know.

19 THE COURT: Okay. So...

20 MS. KERR: And then I think --

21 THE COURT: You believe --

22 MS. KERR: I believe --

23 THE COURT: -- that a year would be
24 sufficient level?

25 MS. KERR: Yes.

1 THE COURT: So you indicated they already
2 answered DR19 and 20. Or -- now 19 and 20, are those
3 updates or answers?

4 MS. KERR: Those were up -- we asked for
5 updated information to find out what -- because the
6 answer -- the answer that we had for 19 and 20 was as
7 of -- was originally as of June of '22, and so we
8 asked, you know, what -- what's the number of tenants
9 currently, and they responded with April 2023, how
10 many tenants they had currently. So that's --

11 THE COURT: Bear with me just a moment.

12 MS. KERR: Sure.

13 THE COURT: Okay. Ms. Bell.

14 MS. BELL: Sure. I will go through, since
15 I think we've agreed that there is no longer a dispute
16 as to DR19 or 20, so I will forego arguments on that,
17 but starting with DR14, I think we need to back up
18 just a little bit.

19 A little bit of background about I-70.
20 It's a small company, as Ms. Kerr indicated in
21 response to DR's 19 and 20, I-70 indicated they've got
22 about 50 tenants taking water or sewer service. So
23 we're not talking about a -- Ameren, a huge
24 organization, that has unlimited staff and resources.
25 In fact, I-70 has no employees and has two owners who

1 both live out of state, so when we're talking about
2 burden on a small business, I think we need to keep
3 that in mind that any additional discovery that would
4 be required would require significant travel, and it's
5 not like, you know, there's just someone sitting there
6 waiting to pull records in this type of entity, so
7 it's different than a lot of cases that I, at least,
8 personally, see at the PSC.

9 In addition, I-70 received a questionnaire
10 from the PSC and that was back in 2021, and they were
11 just inquiring about I-70's operations. There was no
12 complaint on file at that point. And at that time
13 this was in April of 2021. And in that time, they had
14 asked a number of questions and asked for a number of
15 documents which I-70 happily and voluntarily provided
16 records, many of which we are at issue today. And so
17 if you could imagine in April of 2021, what I think
18 the PSC -- I think the staff had asked for about a
19 year of a lot of these records, so in general, I-70
20 provided backing up from, you know, records from 2020
21 and 2021, in an attempt to explain to the staff how
22 I-70 was operating, so they pulled all these records
23 back when they first were asked in 2021. Nothing
24 happened for a number of months due to, I think, staff
25 turnover and other internal issues, so ultimately,

1 there was a lack of communication, I think, between
2 2021 until around December of that year. And it -- it
3 resulted with a complaint being filed in April, I
4 think of 2022, so almost a year delay.

5 So when we're talking about Ms. Kerr had
6 said that she thinks a year of documents is sufficient
7 and that's really what I-70 has already provided, what
8 the staff wants is, they want a different year of
9 documents, and that's why you have the exhibits in
10 front of you, so if we look at -- if we look at DR14
11 and what was actually provided, I think Ms. Kerr
12 described it as five documents, but it's actually 120
13 pages of documents.

14 THE COURT: What -- what exhibit are we
15 starting with here so that I can catch up?

16 MS. BELL: Exhibit one.

17 THE COURT: Exhibit 1.

18 MS. BELL: Uh-huh. And I think Ms. Kerr
19 indicated, you know, it's just 56 bills. If there's
20 56 tenants, then it's 56 bills, but actually, it's 56
21 bills times every month. They're monthly bills, so it
22 would be 56 times 11 or 12. I think at one point she
23 said 11 months, so that's not just 56 bills. It's
24 quite a lot. And if we go through the answer here,
25 and I think I'm on --

1 THE COURT: Which DR are we talking about?

2 Are we talking about 44?

3 MS. BELL: 14. Exhibit 1.

4 THE COURT: I see it.

5 MS. BELL: In the first response, we
6 provided a lengthy narrative about how the bills are
7 produced, and in the last paragraph, we say once the
8 number's calculated the bill posts to the tenant
9 portal. And so these bills are not mailed out. The
10 tenants log in and basically, their end of it, they
11 can download what looks like a bill from their end,
12 and then they -- then they pay it. So not only, you
13 know, we do not have -- we do not mail these out, and
14 we do not have hard copies sitting in a file room
15 somewhere of these bills. They're all through a
16 program, some software. And so what we did provide --
17 and so a basic tenant of discovery is, you're not --
18 you aren't required to provide document -- you aren't
19 required to make up documents that you don't have, and
20 so these documents are -- are through a portal that
21 can be pushed out through the system but aren't
22 currently in existence anywhere in what -- in paper
23 form or PDF form. You would actually have to go in to
24 each client to each month and download out of that
25 portal which is very burdensome for my client when

1 you're talking about 56 times 12. So what we did try
2 to -- but we tried to provide -- and again, this was
3 provided in 2021, so if we turn to page 8 of the PDF,
4 you see a sample bill and what that is, is when the
5 tenant goes into the portal.

6 THE COURT: (Inaudible).

7 MS. BELL: I'm sorry?

8 THE COURT: Pages aren't numbered, so I
9 have to -- all right. You said page 8?

10 MS. BELL: Yes. It should say --

11 THE COURT: Including the first page,
12 that's including.

13 MS. BELL: The PDF numbers in the document,
14 so you should see a statement at the top.

15 THE COURT: Got it.

16 MS. BELL: Okay. And that is a sample
17 bill. So if the tenant goes into the portal and
18 clicks, I want to view my bill, this is -- this is
19 what's shown, but essentially, it's a shell that is
20 pulling these numbers from the computer program into
21 the (inaudible) and Ms. Kerr said the reason why they
22 want to view the statements is to know how much I-70
23 is charging, and if it's marked up at all. And so
24 this is a sample showing this is what -- this is what
25 it looks like. This is how those numbers pull into

1 the bill. And if you want to know what the rate
2 that's being charged, if you look down in the comment
3 box, the bill shows this comment box water usage times
4 this rate, sewer usage times this rate, and so -- you
5 know, here's the other details, and that's the same
6 for every bill. It's just, you know, the numbers
7 change slightly due to whatever you're using. So
8 that -- you know, she's trying to calculate what
9 I-70 is actually charging. This is evidence of that.

10 If we turn to the next page, there are
11 Excel billing histories for that same kind of mid
12 -20 -- mid-2020 to mid-2021, and again, it's showing
13 the meter readings, the usage and what the bill is.
14 The water bill, the sewer bill, and the combined bill.
15 And those are Excel histories, and there's a number of
16 pages of those. The other documents that are
17 provided, if you go to what is page 34 in the Excel
18 document, you see a charge detail. And again, when
19 you have these --

20 THE COURT: Hold on. Just a second. I
21 want to get there. Okay.

22 MS. BELL: When you have these computer
23 systems, they allow you to run certain reports, and so
24 that's what I-70 was trying to do. I'm going to run a
25 report that shows all the charges for that time period

1 to show them this is what's going out on the bills.
2 And that's -- so you have it for every month by
3 customer for that entire period. If we flip again
4 back to page 82.

5 THE COURT: Okay. Wait a second.

6 MS. BELL: Uh-huh.

7 THE COURT: Okay.

8 MS. BELL: You can see there's a report
9 that's called Utility Historical Consumption, so for
10 the same period, it is pulling those readings, the
11 previous readings, the consumption, the charge, the
12 post date, and the account number, and again, that's
13 everything that would appear on the bill. It's just
14 in the format that the portal spits it out in, and
15 that's for -- that's for that period, you see, 10/1/20
16 to 10/31/20, and I think actually, it -- it goes into
17 2021, and I think -- I think the really important
18 document is the last two pages. And this was the
19 final document that was provided in response to 14,
20 and that's something that when the -- the staff first
21 inquired about, again, precomplaint and asked I-70
22 what's going on. They took all this -- I-70
23 voluntarily took all of this data and created this
24 document to try to explain, here's how that -- all
25 that works together, so what you see is --

1 THE COURT: What page are we on now?

2 MS. BELL: So 119. It's the last two pages
3 of what was produced. Here in Exhibit 1.

4 THE COURT: There's also -- you said 92?

5 MS. BELL: I have 119.

6 THE COURT: Okay. Sorry. Bear with me.
7 Okay. I see it. That's this colorized table.

8 MS. BELL: Uh-huh. And that's a summary
9 that was created by I-70 to try to make sense of all
10 of this computer reporting out of this portal, and
11 they've summarized by month for a year of, here's the
12 usage, here's how much we pay for the water, here's
13 how much the tax was. So you'll note this also
14 summarizes the Bates City bills, that's that the first
15 chart, shows the price, the tax, and how much they
16 paid. If you go down to the next box, you're looking
17 at what they billed the tenants by month, and what the
18 tenants paid, and what the tenants didn't pay. And
19 that first box is for water and -- and the second box
20 is for sewer.

21 And so you're seeing basically they
22 summarized all of the previous -- I don't know -- 150
23 pages of -- from the portal in an attempt to show
24 what's going on at the PSC.

25 So, again, what Ms. Kerr said what's

1 important to her is, what's the mark-up, are they
2 marketing it up, and you can see here exactly what's
3 going on.

4 THE COURT: Okay. You want me to ask
5 questions about that now or do you want to go on?

6 MS. BELL: Let's -- we can address those
7 now.

8 THE COURT: Okay. I'm familiar that -- you
9 know, that they -- at least discovery rules, you are
10 correct, do not require you to create a document or
11 something that does not exist, but that doesn't
12 relieve people from providing copies of things that
13 they already have or that they can access.

14 So let me ask this. Can the tenants
15 individually download their bills? Are they capable
16 of downloading and printing out their bill?

17 MS. BELL: Are the tenants -- I believe so.
18 I think they can get into their portal and access
19 their past billing history.

20 THE COURT: And is your client able to get
21 in there and print out individual bills? I understand
22 the argument that would -- with a minimum of 616 of
23 them, for 56 tenants, that's a lot, but is I-70 even
24 capable of doing that?

25 MS. BELL: I believe -- I -- I don't think

1 printing them out is the right term. Like, they're
2 not sitting in a file folder where bills exist and we
3 can just print them out. We would have --

4 THE COURT: I didn't gather that to be the
5 case. I gather that this is some sort of software,
6 but I would have to think that, that for the
7 individual tenant's records as well as assuming I-70
8 Mobile City Park is paying taxes for those records as
9 well that you would be able to access those.

10 MS. BELL: You can go in and click, like,
11 publish or download. It would then create that
12 invoice that the tenant sees, then you can save it,
13 and print it, but right now it doesn't exist.

14 THE COURT: And those individual -- those
15 individual invoices, do those show a breakdown of
16 charges such as, you know, this is the charge for
17 rent, pad rent, this is the charge for water, sewer,
18 cable, whatever you have; is that -- is that -- can
19 the customer print out something that would resemble a
20 bill from this portal?

21 MS. BELL: That would be page 8 from the
22 statement.

23 THE COURT: That was that system,
24 approximately, that you had talked about before?

25 MS. BELL: Uh-huh.

1 THE COURT: Let me go there again. So this
2 is what an -- if an individual customer printed out
3 their bill, this is what they would see?

4 MS. BELL: Correct.

5 THE COURT: Okay. Bear with me just a
6 second. I had another thought, but I lost it
7 momentarily.

8 Now you understand that you'd indicated
9 this was all provided -- a lot of this was provided
10 prior to the complaint; is that correct?

11 MS. BELL: It was provided at that time,
12 and then it was also provided in response to the DR.
13 So all of this -- if you turn to page -- let's see.
14 Page 7 -- 6 and 7, right before the sample bill,
15 you'll see our response on July 7th, 2022, and the
16 second page says, see the following produced with this
17 response. And all of that -- all of this, 150 pages,
18 was provided back in July. It was provided again. We
19 had previously provided it, but we provided it
20 again -- again, with the thought being, we've given
21 this to you, we'll give it to again, but you're
22 requiring us to go in and -- and do a different year.
23 It's the same information. It's what we have.

24 THE COURT: And I'm not an engineer or
25 anything like that, so. There are a large parts of

1 utilities that are complete mysteries to me. I see
2 this thing at the bottom, water usage times and gives
3 a number and sewer usage times, and it gives a number.
4 But I don't know anything about those numbers. It
5 doesn't say, you know, gallons per minute. It
6 provides no units whatsoever. Or no explanation of
7 what -- I'm sorry, it provides no unit -- explanation
8 of what units correspond to those numbers.

9 MS. BELL: Right. And so if you were to go
10 to the meter readings and the usage, I want to say --
11 it's obvious, once you start doing the math, I think
12 it's -- I think it's -- it's in tens of gallons;
13 right? I think you, basically, remove the thousand,
14 but you see this usage, 561, 561, and you then see the
15 amount. Once you do the multiplication, it's on
16 there, and if you go to --

17 THE COURT: That's the Excel?

18 MS. BELL: Yeah.

19 THE COURT: Where it says gallons?

20 MS. BELL: Correct. There you go. And so
21 I think they just dropped the zero actually on the
22 bill, which I think when we go into the Bates City
23 water bill, you'll see also that they don't put the --
24 the extra zero on the end.

25 THE COURT: You said there are two owners,

1 and they reside out of state?

2 MS. BELL: Correct.

3 THE COURT: Who collects the bills for
4 these?

5 MS. BELL: The tenants play online through
6 the portal.

7 THE COURT: So everything is done through
8 the portal?

9 MS. BELL: There's an office -- and I think
10 you can -- you can pay at the office, but you know,
11 whether or not -- and who does that, I'm not sure. I
12 believe most people pay through the portal.

13 THE COURT: Is there -- you indicated they
14 have no employees?

15 MS. BELL: They do not.

16 THE COURT: Is that correct? Who's manning
17 this office?

18 MS. BELL: It is -- they have some
19 independent contractors, but if you think about a
20 mobile home, like an apartment building, many
21 apartment buildings do not have someone sitting in an
22 office 24 hours a day.

23 THE COURT: Okay. That's noted. And your
24 objections to answering DR14 are that it is overly
25 broad and burdensome and not necessary; is that

1 correct?

2 MS. BELL: That's one of them. The other
3 one is, it's asking for -- if you specifically -- if
4 you look at the objection letter G, it's asking for
5 documents that simply do not exist. It's also
6 duplicative and cumulative. You know, they want a
7 year, they have a year. You know, now they want a
8 different year, but the -- the information that they
9 would need or that -- the commission needs to decide
10 this question, and we say in our response, nothing has
11 substantially changed about the business between the
12 time that we produced this and today. We can give the
13 updated reports, but it's just going to be
14 structurally and operationally the same.

15 THE COURT: Ms. -- Ms. Kerr, do you have
16 the -- the same PDF open in front of you?

17 MS. KERR: Yes.

18 THE COURT: And on page 8 of that PDF,
19 are -- is -- are those the kind of billing documents
20 that staff is looking for?

21 MS. KERR: Well, this is just one billing
22 document. I mean, it doesn't have anybody's name on
23 it or a unit number. So, you know, I know we can't
24 verify that that's an actual bill to an actual tenant,
25 you know, so perhaps, this is -- you know, this is

1 a -- I mean, this looks like a bill that would go out
2 to a tenant, but this is the only bill that was
3 provided to us. We asked for all -- a system,
4 approximately -- we asked for all the bills to the
5 tenants. We got one single bill. And even if they
6 provided bills for the year 2020 or 2021, that does
7 not give us -- you know, they can say that nothing's
8 changed, but we don't know that. We didn't verify
9 that without looking at the bills, the current bills
10 for 2022, number one, and we asked for the bills of
11 all the tenants. We got a single bill with nobody's
12 name on it, no unit on it. So no, this is not
13 sufficient. This is not a sufficient answer.

14 THE COURT: Okay. Let me -- let me further
15 ask that. If it had a unit number, would that be
16 sufficient?

17 MS. KERR: Probably. If it had -- yeah.
18 I -- I suppose it would be. If we got more than one
19 bill, so we could, you know -- and if we had the
20 information from Bates City or the public water
21 service.

22 THE COURT: That's a different DR. I'm not
23 going to that right now.

24 MS. KERR: Right, right. But --

25 THE COURT: Let me ask this then. So I see

1 here account number, and there's nothing under that.
2 I see unit number. And there's a hashtag, but no unit
3 number. It just says I-70 Mobile City, Incorporate,
4 at the top, and what I assume is, the address of the
5 park itself. Since the -- both the above and below
6 are identical, and there's no -- Ms. Bell, why doesn't
7 this have the unit, the account number or any other
8 information in regard to who?

9 MS. BELL: It was meant to be a sample bill
10 as to showing this is how every bill is created, and
11 so it's -- it was meant to be an example. I -- I
12 believe this specific customer information was just
13 redacted, I believe. And -- but what it's meant to
14 show is, if you go to these other pages, where does it
15 contain things like unit number or consumption? The
16 program pulls in that personal information for each
17 customer.

18 THE COURT: Yeah. But without it on this,
19 there's no way to match the -- the sample bill to
20 anything, but that's -- that's just a -- that's not
21 really a relevant comment.

22 Let me ask this. Hypothetically, if I were
23 to agree that as -- as was indicated, the neighborhood
24 of 616 bills was overly burdensome or too much to have
25 your client print out. Well, I'm actually going to

1 start with Ms. Kerr, and we'll kind of back -- back
2 this to you, Ms. Bell.

3 Ms. Kerr, if -- if -- I'm trying to think
4 of how this could be done, if it could be done. Would
5 staff be agreeable to a representative sample of bills
6 for the relevant July 1st to present that would
7 encompass something smaller than the 616 bills, like
8 100 bills; would 100 -- I don't know how you would go
9 about selecting random bills. I know that's something
10 that utilities sometimes do, but we're in a little bit
11 of a different --

12 MS. KERR: I think -- I think that -- I
13 think we had -- I think a lesser -- a sampling would
14 be fine, 120, 150, I think, would be fine.

15 MS. BELL: And Your Honor, can I ask a
16 question?

17 THE COURT: Go ahead.

18 MS. BELL: And I don't know that -- I mean,
19 I guess I don't know whether staff is seeking one
20 customer over many months or just like one
21 representative month.

22 So, for example, if we agree we have 56
23 tenants right now, you know, could we do one month of
24 all the bills for every tenant, because also if
25 they're seeking -- these are transitory people, so

1 even if they picked a customer and they wanted it over
2 12 months, I don't know that that customer's there for
3 12 months. So in my mind, if we're going to limit it,
4 it would be more of pick a month, and you can have all
5 the tenants that are taking service that month and
6 that would be 55, I think, 56. Where are we at? 64.

7 MS. KERR: I think we would want a
8 representative sample of the year.

9 THE COURT: And that makes sense to me as
10 well. I'm listening. I can see -- Ms. Bell, I see
11 your argument that people don't stay there a year all
12 the time. And that, that things may change in regard
13 to that. I would like -- I would think that there
14 would be a way to do both, that there would be a way
15 to provide a few customers that have been there a year
16 and provide their complete year-long lineage of bills,
17 and at the same time provide a -- a random spattering.
18 So if you had, you know, let's see, talking about, if
19 you had five customers that had been there a year,
20 having their complete bill lineage for that year, and
21 then maybe having a -- a representative month or two
22 sample across; would that be something that would work
23 for staff?

24 MS. KERR: I think, so at this point, sure.

25 THE COURT: Would that be something -- and

1 I'm not saying this is what I'm going to do. I'm just
2 kind of bouncing around ideas. Would that be
3 something, Ms. Bell, that your client would be able to
4 do?

5 MS. BELL: If we're talking about five
6 customers for -- you know --

7 THE COURT: A year.

8 MS. BELL: -- for a year, that -- I mean, I
9 think that's better. I think originally Ms. Kerr
10 wanted everything in 10 days, and I'm not sure we can
11 meet that timeline, with 60 downloads, but we can
12 certainly try.

13 THE COURT: I'm less worried about time at
14 this point. I mean, this case has gone for a while.
15 What I'm more worried about is, being sure that every
16 side is -- is getting the discovery that they need to
17 do what they need to do, so.

18 MS. BELL: Yeah. And I think we'll get
19 into it when we get into the sample agreements, but in
20 our mind, I think what Ms. Kerr is going to want to
21 see is the bills of folks who are receiving water and
22 sewer service, but once we get into the sample
23 agreements, you know, if you're asking me what a
24 representative sample is a lot of the tenants at I-70
25 are RV homes or other folks who lease the land who

1 aren't receiving any water or sewer service. And so
2 when we're talking about whether or not you -- you
3 provide sewer service to the public, I-70 only
4 provides sewer and water service to certain tenants
5 under certain contractual terms. So if we were going
6 to provide a representative sample of our full and
7 complete tenants, it would include folks who are not
8 receiving any water and sewer and are just paying pad
9 rent. I'm happy to provide the water and sewer
10 invoices to Ms. Kerr, but that provides an incomplete
11 picture of the operations at I-70. Now all of that
12 has been explained in other DR responses, that -- that
13 RV rentals are pretty common and are unaware of any RV
14 park that -- where they, you know, just rent the land
15 that's ever been -- you know, had an issue with the
16 PSC, and that's a pretty substantial portion of I-70's
17 business, but we're happy to provide the invoices, you
18 know, where the water and sewer is being provided.

19 THE COURT: And I'm going to tell you right
20 now, Ms. Bell, that I have presided over rate cases
21 that have involved vacation -- vacation pad rentals,
22 and that -- for parks that also -- that serve, you
23 know, semi-permanent residences, permanent residences,
24 who rent for years at a time, and also have -- also
25 have people that come and just stay the weekend and

1 park their RV on a pad and access the utilities that
2 way. It's not -- I've heard you made an argument a
3 number of times, but I don't think it's unheard of,
4 and I have presided over cases involving that.

5 MS. BELL: May I --

6 MS. KERR: There are several mobile homes
7 on that property that are getting water and sewer. So
8 there are plenty of bills for those mobile homes that
9 you'll be able to provide.

10 THE COURT: Well, that's what I was getting
11 to is, if we're talking about a representative sample,
12 certainly, out of 60 pads, I think you can find five
13 that have stayed there a year or at least close to a
14 year, and likewise, I think a matter of other bills,
15 if a representative sample were to be sufficient for
16 staff's purposes, I would think that that would be
17 doable, too, and that would be -- you talked,
18 Ms. Bell, about this being a little bit of a different
19 situation, and this being burdensome because the size
20 of the client being out of state, and so I'm trying to
21 keep that in mind here while I look at this. Bear
22 with me. I know I'm speaking in incomplete sentences.
23 I'm aware of that.

24 MS. BELL: No. I didn't mean to be unclear
25 earlier with respect to the RVs. I was talking about

1 specifically RVs that don't -- that don't hook up to
2 any utilities, and there are leases and tenants that
3 are -- that have no access to utilities on the
4 property whatever. I understand the RV was hooking up
5 to something that -- that's a different story.

6 THE COURT: Okay. Thank you. Thank you
7 clarifying that for me.

8 All right. I think -- is there anything
9 else you wanted to say about DR14, Ms. Bell?

10 MS. BELL: No, Your Honor.

11 THE COURT: Okay. Let's move on to your
12 objections to DR42.

13 MS. BELL: Okay. And in the exhibits that
14 I provided that is labeled as Exhibit 4.

15 THE COURT: Okay. Hold on. Wait just a
16 second.

17 MS. KERR: I'm sorry, which DR?

18 MS. BELL: 42.

19 THE COURT: 42.

20 MS. KERR: Okay. Sorry.

21 THE COURT: That's 19 pages; is that
22 correct?

23 MS. BELL: Correct.

24 THE COURT: Okay. Go ahead.

25 MS. BELL: And this was the request for the

1 Bates City water bills, and what was done was a -- a
2 provision of one year of those bills to I-70. You can
3 see those are attached, and that is what was -- again,
4 we're talking about, you know, they want five years,
5 we gave them a year. This is the period for which we
6 provided other documentation that we just walked
7 through, and the point was, you know, what Ms. Kerr
8 wanted to see was, is there a markup for what's coming
9 from Bates City to the tenant bill which is why that
10 period matches up, but again, when we looked at that
11 colored summary from the last exhibit and you saw that
12 chart, this information is all summarized there
13 straight from this -- these documents. And so, you
14 know, this taken with Exhibit 14 would allow Ms. Kerr
15 to delineate what she said was relevant to her case,
16 but these are the actual Bates City's bills. It shows
17 the usage, the amount paid, the check number that it
18 was paid for, and you'll see that it matches up with
19 that chart. I think now, again, staff is seeking a
20 year, and I think, you know, the last 12 months.

21 So, again, our argument is, we provided
22 12 months, we provided the 12 months that coincides
23 with the other information we provided, so you can do
24 the calculations that you requested. You know, if we
25 provide this year -- or then they would need all the

1 bills from the corresponding month to do the
2 calculation they want to do, and so we felt like staff
3 could do the calculations with the documents they
4 received. And that we had provided them. Any request
5 would be cumulative, duplicative, and burdensome.

6 As you can see, these are not
7 electronically stored records. They are mailed
8 records. And so it would likely require someone at
9 the office to gather and photocopy these records. And
10 so they have a year, they wanted a year, and now
11 they're just requesting a different year.

12 THE COURT: I guess my first thing is that
13 the year doesn't really appear to correspond to
14 anything since it doesn't match up to any bills that
15 are identifiable to any particular customer. As you
16 indicated, these are -- these are -- these are
17 physical bills from Bates City water. They clearly
18 have them, and there is a continuing duty to update
19 discovery. So I guess I -- I'm not really
20 understanding your argument here as to -- again, if --
21 if we were -- if everybody were to agree to a random
22 sample or if the commission were to order compliance
23 with -- with a sample that was somewhat paired down
24 from the total number of bills, it would have to be
25 able to -- this data has to be able to correspond to

1 something else. So if you have -- if you have -- if
2 you're providing data from tenants for the year
3 of 20 -- you know, of July 2022 to now, that it's not
4 going to correspond to any of the Bates City water
5 bills that -- that have been provided here. So I
6 don't -- I don't think that any calculations could be
7 done between those two that would have any sort of
8 meaning.

9 MS. BELL: So if we flip back to the last
10 two pages of 14, the calculations there are done, for
11 the period of 2020 and 2021. And so like we had
12 argued that, you know, all they need is one year.
13 They had '20 and '21, this corresponds with that
14 period. So they could conduct the calculations
15 because what was provided under 14 and what was
16 provided here under 42 was the same period. So if we
17 look at that chart, and you see tenant billing
18 payment/nonpayment, you see the water bill, the final
19 bill, and what the tenant paid. So you can see
20 whether -- how those -- how those match up. If the
21 commission were to --

22 THE COURT: For that period of time, but
23 not the period of time of the complaint.

24 MS. BELL: I -- well, the complaint's on
25 going. So should the commission order additional

1 bills to be produced from a different time period, I
2 guess I would concur that you would need the -- the
3 Bates City bills from that same period in order to do
4 the calculation.

5 THE COURT: And there's not 616 of those.
6 I guess somebody would have to copy them. I guess
7 somebody -- you know, find them, but I would think any
8 business would be expected to retain these relatively
9 retrievable anyway.

10 MS. BELL: Yeah. I mean, if the commission
11 wants us to produce those, we have copies of our
12 records. We are organized. I guess the point was,
13 small business. We provided a year of both the
14 bill -- the computer records and the Bates City bills,
15 and it -- if this goes on for two more years, what
16 stops the staff from coming in two years from now, now
17 we want 2024.

18 So we were just taking the position that we
19 provided a year in both circumstances. Again, I would
20 concur with Your Honor that if you require bills from
21 2022, that the staff would need the Bates City bills
22 to correspond to make that calculation. We were just
23 saying they already have it from 2020 -- you know, '20
24 and '21. Nothing has changed. They should be able to
25 do the calculations and make their arguments based on

1 that year.

2 THE COURT: Okay. And I see that that's
3 your assessment. That may not necessarily be the
4 commission's assessment. I do agree that, you know,
5 if this were to go on for two or three or four more
6 years, certainly, that it then becomes -- it becomes
7 very problematic for your client to continually answer
8 discovery requests on a case that's not moving.

9 MS. BELL: And one other thing, Your Honor.
10 I would agree this request in isolation looks like not
11 that much work, but I would say -- I think we're at 58
12 DRs or maybe 60 with all of the supplements, and we
13 provided more than 300 pages of documents in multiple,
14 multiple tranches of DR requests. So in isolation,
15 you know, copying the Bates City bills is not -- is
16 not -- you know, if that was the only thing that we
17 were asking to do, I think we wouldn't be saying, oh,
18 this is, you know, overly broad and burdensome, but
19 given that this case, again, only involves 50 people
20 in a mobile home park with a business that has barely
21 any resources, you know, 400 pages, 50 plus DRs in
22 totality has been -- has been a significant burden on
23 the company and on its resources and on its -- on its
24 (inaudible).

25 THE COURT: With that argument in mind, I

1 do think we're talking about -- I don't know, because
2 I'm not part of the -- the discovery process between
3 the parties other than in this capacity. So when
4 we're talking about 11 or 12 bills from Bates City
5 water, just to update discovery as required by the
6 rules to current, I'm a little lost there. It
7 seems -- and as I indicated before, I mean, thousands
8 of pages of documents are meaningless if they don't
9 correspond to each other, if there's no way in which
10 they relate. I mean, if you have documents from the
11 1700's and documents from 2020, even if they're
12 covering the same items, there -- there's virtually no
13 relevance at all to each other, so I do see staff's
14 point in regard to this, so. Did you have anything
15 else you wanted to say about DR42?

16 MS. BELL: No, Your Honor.

17 THE COURT: And from staff's position, I'm
18 going to -- these are 19 pages with the bills from
19 Bates City water. Are these the kinds of bills that
20 staff is looking for in response to their DR?

21 MS. KERR: Yes.

22 THE COURT: Okay. So it would be -- you're
23 just looking for these kinds of bills that would be
24 from the July 1st, 2022, date forward.

25 MS. KERR: Yes. And -- and really, the

1 only reason I added this to -- to this motion is
2 because, you know, there's a duty to update, and I
3 asked in an e-mail, could you, please, update this,
4 and I never got a response, and that's why we're here
5 today on this. I mean, this could have been resolved
6 a long time ago.

7 THE COURT: That -- that's a continuing
8 problem. That is something that's carried over from
9 our last --

10 MS. KERR: Right. We just want updated
11 information. That's it.

12 THE COURT: And I -- I just want the
13 parties to communicate. So I get -- I am concerned
14 when it appears that the parties are not
15 communicating.

16 All right. Let's go on to DR44. And those
17 are the leases.

18 Ms. Bell, if you want to go over your
19 objections to providing those.

20 MS. BELL: Sure. The staff had requested
21 all of the leases for all of the tenants, and as I
22 indicated, the tenant leases -- the tenants are
23 somewhat transient, and so we seem to be stumbling
24 over this point, and I think their original request
25 was currently. Give us all your current leases. And

1 so is that the month that they asked, is that supposed
2 to coincide with the period of the bills that they
3 have requested. And so we -- it seems to be an issue
4 and now, of course, you know, we're a year later, so
5 is -- is it now today current, and at what point am I,
6 you know, continuing to provide these, especially if
7 we've got folks coming in, you know, for an RV rental
8 for the weekend, you know, for two days, am I then
9 needing to produce all of those.

10 And so it's just, again, there's no one --
11 there's -- it's not a huge organization with a lot of
12 resources or employees. And so we thought the best
13 way to do this is explain that, you know, if a
14 customer were to come in to -- come into I-70 today
15 and want to lease, these are the agreements that are
16 used. It's -- like a sample bill, but, you know, a
17 sample agreement, this is what they sign. These are
18 the forms of the tenants on the property. And so the
19 response is, when a guest or tenant at I-70 inquires
20 about service, they are presented with the following
21 agreements, and they get to choose. They can choose
22 to take what's -- and so if we're -- we can actually
23 flip to -- we're on exhibit -- I think this is
24 Exhibit 5.

25 THE COURT: Hold on while I pull it up.

1 Okay. And that's 18 pages; is that correct?

2 MS. BELL: Yes.

3 THE COURT: All right.

4 MS. BELL: And so depending on what the
5 needs of the particular tenant --

6 THE COURT: And this is -- I'm sorry to
7 interrupt. This is a sample lease agreement with
8 I-70; correct?

9 MS. BELL: I think there are five sample
10 agreements here.

11 THE COURT: What makes these agreements --
12 just so that I can -- I don't have to spend time
13 reading through them during this hearing -- okay. I
14 see a short term, a per week. So there's five
15 agreements because there's five different -- you
16 indicated no utilities that would be this boondocking
17 one.

18 MS. BELL: Uh-huh.

19 THE COURT: Okay. I think that clarifies
20 it to me. So these are representatives of the
21 different kinds of rental agreements that I-70 Mobile
22 City has?

23 MS. BELL: Yeah, depending on the needs of
24 the tenant and -- and so at any given -- and so I --
25 at any given time this question phrased as staff

1 has -- had asked it could be slightly misleading if we
2 provide current leases, because you don't know the
3 full offerings of everything, and next week someone
4 might sign, you know, one of these that you didn't
5 see, if I just gave you the current one.

6 So this is what's here. We're happy to
7 provide the number of tenants that are -- and we did
8 provide in a separate question, how many people are
9 receiving utility services versus RV versus tiny house
10 versus boondocking. We can take that snapshot on a
11 day, but this is -- this is what -- you know, this is
12 what they're being offered, the full spectrum and --
13 and so -- they know how many tenants are -- are at the
14 property. So we have responded.

15 THE COURT: And admittedly, the response is
16 a range. It is a range, and I would say that this
17 would fall on the minimal side of that range. You
18 have provided leases, and you provided leases for
19 different kinds, which I think falls under the minimum
20 of that, but I guess if you're providing leases -- if
21 you -- I -- what I don't understand is, why you didn't
22 provide leases -- well, no. Scratch that. I'm not
23 even going to go into that.

24 MS. BELL: So I will say in a separate DR,
25 not only did we provide the sample leases, we also

1 identified how many of which types of guests are --
2 were on each lease at the time when they asked for a
3 snapshot and a date, and we said, we've got this many
4 tenants on this, this many tenants on, you know,
5 boondocking versus receiving utility service versus
6 one tiny home. So we kind of described the snapshot
7 on that date of what the park looked like, but
8 obviously, depending on weather and seasonality. That
9 changes.

10 THE COURT: This is kind of both parties
11 because here's kind of what I'm hearing. You know, I
12 asked for this, they gave us that. And from the other
13 end, I'm hearing, they asked for this, that is overly
14 burdensome, because of the way it's done, but it
15 doesn't appear that what -- what I'm not seeing is, it
16 doesn't appear that -- I'm going to get back to
17 communication. It seems to me there would have been
18 some way to work this out without involving me to this
19 extent, and getting back to my idea of a
20 representative sample, and staff -- I -- like I said,
21 I see in regards to what they've said would lead to
22 admissible evidence and what they're asking for and
23 why it is. I also see your argument as to why if
24 you've got somebody who's staying a weekend or
25 somebody who's staying, you know, but I do -- I guess

1 I'm having a little difficulty -- you know, if you
2 provide somebody's weekend lease to staff and they're
3 gone, you fulfilled your part of the discovery thing.
4 And then it's kind of staff's problem that the person
5 is no longer there, but with a -- with a
6 representative lease, that's not the case. And it
7 doesn't -- while it may correspond to their leasing
8 practices, it is not a lease tied to any particular
9 place that may or may not be receiving utilities
10 service, and that's -- that's where it becomes a -- a
11 bit of an issue. However, if -- and I said assuming,
12 you know, that -- that I -- you know, that a
13 representative sample would be sufficient where you're
14 talking about five tenants that carry all the way
15 through for a year, and some other representative
16 bills that would go across these various groupings of,
17 you know, short-term RV boondocking, et cetera. It
18 would seem to me that would be something that could be
19 provided without being overly burdensome; would you
20 agree with that? And you don't have to. I'm asking
21 if you do.

22 MS. BELL: I mean, I don't agree -- I don't
23 agree that it's not cumulative and duplicative since
24 we provided the sample agreements and the numbers of
25 everyone that's on there, and the other objection that

1 we raised is just simply relevance. I mean, you don't
2 have to have a lease here. So nothing about the lease
3 changes the nature -- you know, if I don't have a
4 lease and I'm providing water and sewer, the staff
5 could make the same argument, so -- based on the
6 billing. So it's just irrelevant to the ultimate
7 question of law about whether or not we're providing
8 water and sewer. It doesn't say, are you providing a
9 contract for water and sewer? It just says, are you
10 providing it? So whether or not or what the contract
11 says, I think the commission's going to look past that
12 and look at what we're actually doing, which they have
13 that information, and again, the contractor lease,
14 there's no allegation that we've violated any sort of
15 contractual -- contractual lease provision to the
16 extent that there are contracts or leases. And so I
17 don't see how the contracts are relevant to the
18 commission's question of whether they have
19 jurisdiction.

20 THE COURT: Jurisdiction is not the
21 question before us in regard to a motion to compel.

22 MS. BELL: But relevance is, and I think --

23 THE COURT: It is, but that's, again, I --
24 that's not your determination to make. You can --
25 you're free to object that you don't think it's

1 relevant, and you can explain to me why you don't
2 think it's relevant, but that's the commission's
3 determination.

4 MS. BELL: Yes.

5 THE COURT: I just want to be -- I want to
6 be where I would -- for a second there, I didn't know
7 where you were going with that. I thought it sounded
8 like you were confusing the staff and the commission.
9 And there is certainly a wall between those two
10 entities. And -- and I'm aware that you have other
11 objections such as duplicative and such as relevance,
12 but those are not anything, when -- when I'm trying to
13 look at what I think is reasonable in the way of
14 discovery, there's no way to reasonably move whether
15 something is or isn't relevant. Either it is or it
16 isn't, so. Those, I will -- I'll hear your arguments,
17 and I'll address those, but you're not going to hear
18 me ask questions about those.

19 MS. BELL: Okay.

20 MS. KERR: Could I say --

21 THE COURT: Give me just a second.

22 MS. KERR: Okay.

23 THE COURT: Would you agree that a
24 representative sample of leases would be less
25 burdensome than all leases for a year?

1 MS. BELL: A representative sample over a
2 year or a representative sample of five years?

3 THE COURT: I'm not talking about five
4 years. I'm saying, if I -- I'm trying to relate these
5 together. So if you're talking about -- going back to
6 DR14 and you're talking about 150 bills, and you're
7 talking about possibly five-year long tenants over the
8 course of a year, and you're talking about a -- a
9 representative, as you'd indicated, a monthly sample
10 of other tenants, that doesn't necessarily fall --
11 follow their -- their legacy of bills throughout the
12 year. That, again, would need to correspond to
13 something and that would need to correspond to the
14 leases of -- of those tenants. That would be -- that
15 seems like that would be extraordinarily relevant.

16 MS. BELL: So I think if -- what I'm
17 hearing from you, if you picked, you know, five
18 people, John Doe, A through E, and then in conjunction
19 with their monthly bills, we would also provide leases
20 for those customers. You know, I would -- I would
21 consider that less burdensome than providing all of
22 the leases.

23 THE COURT: Okay. I apologize, Ms. Kerr.
24 I had stopped you, because I wanted to get that before
25 I forgot. What did you want to say?

1 MS. KERR: Well, two things. First of all,
2 I think after this DR went out, over the course of the
3 time, I think we've tried to make it clear that we
4 just want them to get copies of the leases that were
5 in effect for the water and sewer customers at that
6 time, not -- you know, I don't think it was an open
7 ended, just get copies of leases, you know, whenever
8 and -- and my last e-mail that went out before these
9 motions -- this motion was filed, in our last
10 discovery conference, I had said, you know, please
11 forward the -- you know, the leases that are currently
12 in effect. Whatever is currently in effect at that
13 time, that point in time, for those 56 water, and you
14 know, found out a week or so after that e-mail went
15 out, those 356 water customers. You know, what --
16 what -- we just want to know what those leases say.

17 THE COURT: Okay. So.

18 MS. KERR: And, you know, if -- and when we
19 filed the complaint and I filed that -- filed the DR,
20 what were -- what were the leases in effect at that
21 time the DR was filed? That was the question. It
22 wasn't an open ended, you know, keep filing leases
23 with us as, you know, every day, every week, every
24 month. It was what -- please give us copies of leases
25 that are currently in effect. That's what it means.

1 That's what it meant, then, that's what it meant, when
2 I asked for the updated ones. That's what it means
3 now.

4 THE COURT: Okay. Ms. Bell, is that what
5 you understood it to mean?

6 MS. BELL: No. Because I heard a lot today
7 that I'm under a duty to supplement. So I would
8 assume just like the bills, if I would have provided
9 all of the leases in 2021, we would be before you
10 asking me for all the bills from 2022 or the leases
11 from 2022. We've heard that multiple times today, so,
12 no, that's not how I understood the request.

13 MS. KERR: You could call and ask. I -- I
14 can tell you and I -- my e-mail says currently in
15 effect.

16 MS. BELL: Which at the time of the e-mail
17 would be different than at the time of the request,
18 and so --

19 MS. KERR: I know. If you answered --

20 THE COURT: Hey. Stop.

21 MS. KERR: Sorry.

22 THE COURT: I don't want you guys just
23 bickering back and forth. If you want to bicker back
24 and forth, you can do that on your own time.

25 MS. KERR: I apologize.

1 THE COURT: This is -- this is -- you know,
2 as I indicated, I have frustrations when -- when
3 parties don't communicate with each other, and I
4 think -- I think it --

5 MS. KERR: I apologize.

6 THE COURT: I'm not asking for an apology.
7 Thank you. I understand.

8 Okay. As you understand the request now,
9 Ms. Bell, leases in effect for when the DR was filed;
10 is that an answerable DR for you?

11 MS. BELL: My --

12 THE COURT: Let's assume for the moment
13 that wouldn't be -- that wouldn't require any update.
14 Let's assume that -- that. I'm not saying that that's
15 the case.

16 MS. BELL: I think what we've been talking
17 about today, Your Honor, is to try to get everything
18 in the same period, so we're talking about the same
19 profile. And so if we are going to provide bills for
20 the last 12 months, and we're going to provide Bates
21 City for the last 12 months, then I think an
22 answerable DR for me would be to provide today current
23 or January 1, 2023, current leases, not two years ago.

24 THE COURT: No. I understand that.

25 Okay. And, again, this is hypothetical.

1 I'm not ordering anything today. So from staff's
2 position, if -- if we're talking about this July 1st,
3 2022 period, moving forward, if hypothetically staff
4 was to pick a day in there and say for the -- for -- I
5 don't know -- say, St. Patrick's Day, March 17th,
6 provide all the leases that were in effect at I-70
7 Mobile City Park on March 17th; is that what you're
8 looking for, something like that?

9 MS. KERR: Yes.

10 THE COURT: And that would be sufficient?

11 MS. KERR: Yes.

12 THE COURT: Is that something -- and I'm
13 not addressing your other objections, Ms. Bell,
14 because I'm aware that they're out there as to all
15 three DRs., but is that something that -- that you
16 would be able to provide?

17 MS. BELL: To the extent there are leases
18 on that day, I -- I believe I could. I believe I
19 could. I'm not sure. I think my preference, again,
20 would be a representative sample, but I believe the
21 lease -- there are signed leases available to copy.
22 Whether there's anyone available to copy them, I'm not
23 so sure.

24 THE COURT: Yeah. And I -- I understand
25 your argument. I mean, theoretically, on any given

1 day of the year, there could be nobody in the park.

2 MS. BELL: Correct.

3 THE COURT: There could be zero, zero
4 leases. I mean, probably unlikely, because then it's
5 not really a business, but so that number could --
6 theoretically, that number could be 56, that number
7 could be 12.

8 MS. BELL: But I think we can provide, you
9 know, a representative sample.

10 THE COURT: But what I'm saying is, if
11 you're providing five -- and again, I'm going back to
12 my hypothetical with that same thing. If you're
13 providing five customers with a year's worth of bills
14 for those customers, customers who have stayed there
15 for a year, and over that year, you provide the -- all
16 the leases that were in effect over March 17th, those
17 should cross; that's correct, right?

18 MS. BELL: They should. And at that point
19 I would ask that the request be limited to those five
20 customers because they match up, because I think
21 another goal here, too, is to protect the -- you know,
22 is to keep as many documents public as we can, and
23 once we start getting into customer specific
24 information, I'm going to have to start redacting or
25 marking things confidential as we go forward.

1 So, I mean, my preference, again, as
2 someone who values individual privacy is, if we're
3 focused on five individuals for the billing that we
4 provide those five contracts or something less than
5 the entire universe, but, again, you know, we will
6 follow the Court's order or the commission's order to
7 the best of our ability.

8 THE COURT: Okay. I'm certainly amenable
9 to your concerns over privacy. And, you know, I would
10 have no problem doing a -- I would have no problem
11 doing an entire hearing in camera except for the hello
12 here, we are today, let's go on the record, and we'll
13 adjourn for the day, so. I certainly understand
14 privacy concerns. But there's got to be a way that
15 information can be shared, and yet, still adequately
16 address those concerns. And yet, comply with
17 Missouri's Discovery Rules.

18 And Ms. Bell, I'm sorry I've interrupted
19 you a number of times to ask my questions. You've
20 been very gracious about it. And so if I've cut you
21 off or prevented you from saying anything you wanted
22 to say about these DRs, I would like to give you an
23 opportunity to address anything further that you would
24 like to address at this time.

25 MS. BELL: No. I think that -- I think

1 that's it. I think we had voluntarily provided
2 (inaudible) the documents where it was time limited
3 and voluntarily provided all of the sample agreements.
4 We've been doing our best given our limited resources,
5 and we appreciate your time today.

6 THE COURT: Okay. Anything further from
7 staff?

8 MS. KERR: No. The -- you had asked about
9 the date. I think, ideally, if you were going to pick
10 a date for the -- the leases, the response, since we
11 got the response to DR19 on April 26th with 56 tenants
12 for both water and sewer, I think that'll be an ideal
13 date.

14 THE COURT: April what?

15 MS. KERR: I think April 26th, 2023, would
16 be an ideal date for those leases just because that's
17 the date that we got the DR that says that there were
18 56 tenants that had both water and sewer service, so
19 that date would correspond with the number of tenants
20 that had that, so we know there would at least be 56
21 tenants. Now, whether there are 56 leases on that
22 date, I don't know, but that would probably be the
23 ideal -- an ideal date, but other than that, I -- I
24 don't think we have anything else. I think -- I think
25 we've gone through -- through everything that we need

1 to and --

2 MS. BELL: I just have one additional
3 request, Your Honor, that follows the motion to
4 compel, and we -- we've talked about this before, but
5 we -- we talk about how my motion for summary
6 determination has been sitting for some time and that
7 the commission -- or sorry, the staff's response --
8 the commission stayed the staff's response time.
9 Since this is the -- you know, the staff has indicated
10 this is what they need to move forward, and we intend
11 to comply with -- whatever order you make, we'd like
12 to go ahead and get a response date from the staff on
13 that summary determination and a hearing date to
14 decide whether the commission has jurisdiction.

15 THE COURT: I don't think that's
16 unreasonable. I do think that the rule says that --
17 that it can be stayed for a reasonable amount of time.
18 It does not define that reasonable amount of time, but
19 it does state, until discovery is concluded, I
20 believe, or something to that effect. I would have to
21 look at -- look it up. My concern is, we've had
22 multiple discovery issues that -- that have needed to
23 be addressed by the commission now. And so I'm
24 reluctant to order staff to respond -- respond to a
25 summary judgment order until I know that discovery has

1 been completed, and they've had an opportunity to look
2 at the information.

3 MS. BELL: May I propose a solution? Your
4 Honor, I could file a motion to set that date at the
5 time at which I respond to the discovery, and then
6 that would allow staff 10 days under the normal rules
7 to review my responses and to reply to my motion on
8 whether or not they still -- they find my responses
9 insufficient and that might be a way to move forward
10 that staff then could alert you if they're
11 uncomfortable with my responses.

12 THE COURT: I don't find that unreasonable.
13 Ms. Kerr, do you find that unreasonable?

14 MS. KERR: Not at all.

15 THE COURT: And I don't know, at this
16 point, what the commission will decide, but I
17 certainly will be putting this in front of them.

18 Okay. I don't have any further questions
19 at this time. I'm going to ask one more time, is
20 there anything else that the commission needs to
21 address at this motion hearing?

22 MS. BELL: Your Honor, can I offer
23 Exhibits 1 through 5 so they're part of the record?

24 THE COURT: I'm hesitant to do this at this
25 time, and my reasoning for that is -- my reasoning for

1 that is, this is a motion hearing. There's no witness
2 offering this. There's no foundation for it.

3 Let me ask this question. Staff, do you
4 have any objections to admitting these exhibits for
5 the purpose of this motion hearing?

6 MS. KERR: Yes. I -- I object that --
7 first of all, we -- these are DR responses.
8 They're -- they've been filed already and -- in EFIS.
9 I think our arguments are -- since it is a motion
10 hearing, our arguments are sufficient to allow you to
11 make any determination that you need to. If any of
12 the -- the DRs or the DR responses need to come in,
13 they can come in at the hearing. I -- I just received
14 this, you know, right before the hearing anyway, but
15 I -- I don't think these are necessary. I don't
16 think -- like you said, there was no foundation.
17 There's no witness to offer the exhibits. I would
18 object to them.

19 THE COURT: Okay. Ms. Bell, any response
20 to that?

21 MS. BELL: I would just argue under the
22 statute under 536.070 that it's an agent -- I mean,
23 Ms. Kerr admitted that they were filed in EFIS.
24 There's no suggestion that they aren't the originals.
25 They are an agency record at this point. And so I'd

1 at least ask the judge -- that ask Your Honor to take
2 notice of the documents because they are a record of
3 the agency.

4 THE COURT: And you're talking about
5 that -- under 536, you're talking about the discovery
6 rule that says that -- that records of an agency come
7 in by themselves; correct?

8 MS. BELL: I believe so.

9 THE COURT: That's kind of the
10 summarization of that?

11 MS. BELL: It's my understanding.

12 THE COURT: I'm going to sustain staff's
13 objection at this time. I think that if they're in
14 EFIS and you clearly have them, they can be offered in
15 an evidentiary hearing, and I do have the sufficient
16 information I need to respond to the motion and
17 objections. So that will be sustained.

18 Anything further before we adjourn?

19 MS. KERR: Nothing.

20 MS. BELL: No, Your Honor. Thank you.

21 THE COURT: Thank you both for your time.
22 I appreciate it.

23 MS. KERR: Thank you.

24 THE COURT: And we are adjourned. Let's go
25 off the record.

1 And Kayla, you can stop recording.

2 KAYLA KLIETHERMES: Thank you.

3 (Audio ended.)

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

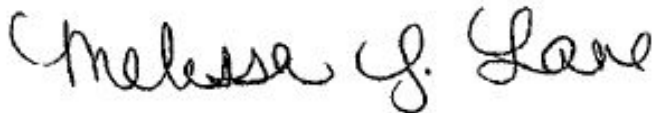
24

25

1 CERTIFICATE OF REPORTER

2
3 I, Melissa J. Lane, Certified Court
4 Reporter of Missouri, Certified Shorthand Reporter of
5 Illinois and Registered Professional Reporter, do
6 hereby certify that I was asked to prepare a
7 transcript of proceedings had in the above-mentioned
8 case, which proceedings were held with no court
9 reporter present utilizing an open microphone system
10 of preserving the record.

11 I further certify that the foregoing pages
12 constitute a true and accurate reproduction of the
13 proceedings as transcribed by me to the best of my
14 ability and may include inaudible sections or
15 misidentified speakers of said open microphone
16 recording.

17 

18
19 Melissa J. Lane, CCR, CSR, RPR
20
21
22
23

24 Date: June 19, 2023
25

\$	41:18	4	8
\$10 12:11	1:30 2:6	4 35:14	8 18:3,9 23:21 27:18
\$50 12:10	1st 6:6,18 7:13,23 10:14 30:6 41:24 54:2	400 40:21	8/2020 5:21
\$60 12:11		42 6:22 7:20 35:18,19 38:16	82 20:4
-	2	44 5:10,11 8:17 9:4 17:2	9
-20 19:12	20 5:7 6:19 9:10 14:2,6,16,21 38:3, 13 39:23	5	92 21:4
1	2020 5:18,19 7:7 15:20 28:6 38:11 39:23 41:11	5 43:24 59:23	A
1 16:17 17:3 21:3 53:23 59:23	2021 5:20,21 7:8 15:10,13,17,21,23 16:2 18:3 20:17 28:6 38:11 52:9	50 14:22 40:19,21	ability 56:7
10 32:10 59:6	2022 6:6,18 7:13, 24 8:2 10:14 16:4 24:15 28:10 38:3 39:21 41:24 52:10,11 54:3	536 61:5	access 3:24 4:1,4 22:13,18 23:9 34:1 35:3
10/1/20 20:15	2023 2:7 14:9 53:23 57:15	536.070 60:22	accomplish 13:8,9
10/31/20 20:16	2024 39:17	55 31:6	accordance 7:16
100 30:8	20th 6:18	56 6:20,21 9:10, 12,13 16:19,20, 22,23 18:1 22:23 30:22 31:6 51:13 55:6 57:11,18,20, 21	account 20:12 29:1,7
11 6:7 9:14 16:22, 23 41:4	21 38:13 39:24	561 25:14	acting 9:20 12:13 13:14
119 21:2,5	22 5:16 7:4 14:7	58 40:11	actual 8:3,16 27:24 36:16
12 16:22 18:1 31:2,3 36:20,22 41:4 53:20,21 55:7	24 26:22	6	added 11:16 12:7 42:1
120 16:12 30:14	26th 57:11,15	6 24:14	addition 12:8 15:9
14 5:13 6:15 17:3 20:19 36:14 38:10,15	27th 5:7	60 32:11 34:12 40:12	additional 15:3 38:25 58:2
1442 5:10,11	3	616 22:22 29:24 30:7 39:5	address 22:6 29:4 49:17 56:16,23,24 59:21
150 21:22 24:17 30:14 50:6	300 40:13	64 31:6	addressed 58:23
16 8:6	34 19:17	7	addressing 54:13
1700's 41:11	356 51:15	7 24:14	adequately 4:13 56:15
17th 54:5,7 55:16		7th 2:7 24:15	adjourn 56:13 61:18
18 44:1			
19 5:6 6:19 9:10 14:2,6,21 35:21			

adjourned 61:24	answers 2:13 4:10 10:5 13:10 14:3	B	48:22 49:4,19 50:1,16 52:4,6,16 53:9,11,16 54:13, 17 55:2,8,18 56:18,25 58:2 59:3,22 60:19,21 61:8,11,20
admissible 8:22 11:13 12:3,19 46:22	anybody's 27:22	back 4:22 5:4 10:11 14:17 15:10,23 20:4 24:18 30:1 38:9 46:16,19 50:5 52:23 55:11	bicker 52:23
admission 9:22	apartment 26:20, 21	background 14:19	bickering 52:23
admitted 60:23	apologize 50:23 52:25 53:5	backing 15:20	bill 5:17 12:4 17:8, 11 18:4,17,18 19:1,3,6,13,14 20:13 22:16 23:20 24:3,14 25:22,23 27:24 28:1,2,5,11, 19 29:9,10,19 31:20 36:9 38:18, 19 39:14 43:16
admittedly 45:15	apology 53:6	barely 40:20	billed 6:25 8:24 12:22,23 21:17
admitting 60:4	appearance 3:3	based 39:25 48:5	billing 5:14,17,18, 20 19:11 22:19 27:19,21 38:17 48:6 56:3
afternoon 2:6 3:22	appears 4:1 42:14	basic 17:17	bills 5:16,24 6:6,7, 8,17,20,21,22 7:1, 5,6,7,10,12,21 9:13 10:10,12,17 11:12,15,16 12:1, 5,16 16:19,20,21, 23 17:6,9,15 20:1 21:14 22:15,21 23:2 26:3 28:4,6, 9,10 29:24 30:5,7, 8,9,24 31:16 32:21 34:8,14 36:1,2,16 37:1,14, 17,24 38:5 39:1,3, 14,20,21 40:15 41:4,18,19,23 43:2 47:16 50:6, 11,19 52:8,10 53:19 55:13
agency 60:25 61:3,6	approximately 23:24 28:4	basically 6:7 7:1 17:10 21:21 25:13	bit 14:18,19 30:10
agent 60:22	April 5:5,7 14:9 15:13,17 16:3 57:11,14,15	Bates 7:7,22 10:19 12:2 21:14 25:22 28:20 36:1,9,16 37:17 38:4 39:3, 14,21 40:15 41:4, 19 53:20	
agree 6:8 29:23 30:22 37:21 40:4, 10 47:20,22,23 49:23	argue 60:21	Bear 14:11 21:6 24:5 34:21	
agreeable 30:5	argued 7:8 38:12	behalf 3:8,10	
agreed 14:15	arguing 3:16	belief 13:9	
agreement 43:17 44:7	argument 4:8 5:22 22:22 31:11 34:2 36:21 37:20 40:25 46:23 48:5 54:25	Bell 2:20 3:9,10,20 4:2 14:13,14 16:16,18 17:3,5 18:7,10,13,16 19:22 20:6,8 21:2, 5,8 22:6,17,25 23:10,21,25 24:4, 11 25:9,18,20 26:2,5,9,15,18 27:2 29:6,9 30:2, 15,18 31:10 32:3, 5,8,18 33:20 34:5, 18,24 35:9,10,13, 18,23,25 38:9,24 39:10 40:9 41:16 42:18,20 44:2,4,9, 18,23 45:24 47:22	
agreements 8:1 9:6,12 32:19,23 43:15,21 44:10, 11,15,21 47:24 57:3	arguments 8:5 14:16 39:25 49:16 60:9,10		
ahead 2:3 4:8 30:17 35:24 58:12	asks 4:24		
alert 59:10	assessment 40:3, 4		
allegation 48:14	assume 29:4 52:8 53:12,14		
amenable 56:8	assuming 23:7 47:11		
Ameren 14:23	attached 7:6 36:3		
amount 25:15 36:17 58:17,18	attempt 15:21 21:23		
Annaleigh 3:11	audio 2:1 62:3		
answerable 53:10, 22	aware 34:23 49:10 54:14		
answering 26:24			

<p>34:18 47:11</p> <p>boondocking 44:16 45:10 46:5 47:17</p> <p>bottom 25:2</p> <p>bouncing 32:2</p> <p>box 19:3 21:16,19</p> <p>breakdown 23:15</p> <p>broad 5:23 13:5 26:25 40:18</p> <p>building 26:20</p> <p>buildings 26:21</p> <p>burden 15:2 40:22</p> <p>burdensome 5:23 7:9 8:7 9:14 13:6 17:25 26:25 29:24 34:19 37:5 40:18 46:14 47:19 49:25 50:21</p> <p>business 2:11 6:12 15:2 27:11 33:17 39:8,13 40:20 55:5</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>cable 23:18</p> <p>calculate 7:5 19:8</p> <p>calculated 6:25 17:8</p> <p>calculation 37:2 39:4,22</p> <p>calculations 36:24 37:3 38:6,10,14 39:25</p> <p>call 3:12 52:13</p> <p>called 20:9</p> <p>camera 56:11</p> <p>capable 22:15,24</p>	<p>capacity 41:3</p> <p>Carolyn 3:5</p> <p>carried 42:8</p> <p>carry 47:14</p> <p>case 2:12 4:12 8:12 9:18 23:5 32:14 36:15 40:8, 19 47:6 53:15</p> <p>cases 15:7 33:20 34:4</p> <p>catch 16:15</p> <p>central 9:18</p> <p>cetera 47:17</p> <p>change 19:7 31:12</p> <p>changed 27:11 28:8 39:24</p> <p>charge 7:3 11:19 12:10 13:2 19:18 20:11 23:16,17</p> <p>charged 11:18 12:9,11,25 19:2</p> <p>charges 11:15 19:25 23:16</p> <p>charging 12:12,14 18:23 19:9</p> <p>chart 21:15 36:12, 19 38:17</p> <p>check 36:17</p> <p>choose 43:21</p> <p>chosen 8:25</p> <p>circumstances 39:19</p> <p>City 2:10,11 3:8,19 4:14 6:11 7:7,23 8:1 9:11 10:19 12:2 21:14 23:8 25:22 28:20 29:3 36:1,9 37:17 38:4 39:3,14,21 40:15</p>	<p>41:4,19 44:22 53:21 54:7</p> <p>City's 36:16</p> <p>clarifies 44:19</p> <p>clarifying 35:7</p> <p>Clark 3:1</p> <p>clear 4:21 10:6 51:3</p> <p>click 23:10</p> <p>clicks 18:18</p> <p>client 17:24,25 22:20 29:25 32:3 34:20 40:7</p> <p>close 34:13</p> <p>coincide 43:2</p> <p>coincides 36:22</p> <p>collects 26:3</p> <p>colored 36:11</p> <p>colorized 21:7</p> <p>combined 19:14</p> <p>comment 19:2,3 29:21</p> <p>commission 2:7,9 3:6 4:20 5:24 6:3, 13 7:11,15 8:9,12 10:10 27:9 37:22 38:21,25 39:10 49:8 58:7,8,14,23 59:16,20</p> <p>commission's 40:4 48:11,18 49:2 56:6</p> <p>common 33:13</p> <p>commonly 9:16</p> <p>communicate 42:13 53:3</p> <p>communicating 42:15</p>	<p>communication 16:1 46:17</p> <p>company 6:25 7:3 14:20 40:23</p> <p>compel 2:13 4:10 6:5 7:11 48:21 58:4</p> <p>compelled 9:24</p> <p>complainant 2:10 8:14</p> <p>complaint 15:12 16:3 24:10 38:23 51:19</p> <p>complaint's 38:24</p> <p>complete 9:5 25:1 31:16,20 33:7</p> <p>completed 59:1</p> <p>completely 6:15 7:20</p> <p>compliance 37:22</p> <p>comply 56:16 58:11</p> <p>computer 18:20 19:22 21:10 39:14</p> <p>concern 58:21</p> <p>concerned 42:13</p> <p>concerns 56:9,14, 16</p> <p>concluded 58:19</p> <p>conclusion 6:4</p> <p>concur 39:2,20</p> <p>conduct 38:14</p> <p>conference 4:21 51:10</p> <p>confidential 55:25</p> <p>confusing 49:8</p> <p>conjunction 50:18</p>
--	--	---	--

consumption 20:9,11 29:15	19:20 20:5,7 21:1, 4,6 22:4,8,20 23:4,14,23 24:1,5, 24 25:17,19,25 26:3,7,13,16,23 27:15,18 28:14, 22,25 29:18 30:17 31:9,25 32:7,13 33:19 34:10 35:6, 11,15,19,21,24 37:12 38:22 39:5 40:2,25 41:17,22 42:7,12 43:25 44:3,6,11,19 45:15 46:10 48:20,23 49:5,21, 23 50:3,23 51:17 52:4,20,22 53:1,6, 12,24 54:10,12,24 55:3,10 56:8 57:6, 14 58:15 59:12, 15,24 60:19 61:4, 9,12,21,24	50:20 51:5,15 55:13,14,20 cut 56:20	47:1 directly 9:21 discovery 4:15,21 5:1 8:21 13:7,10 15:3 17:17 22:9 32:16 37:19 40:8 41:2,5 47:3 49:14 51:10 56:17 58:19,22,25 59:5 61:5 discussed 4:21 dispute 14:15 district 6:23 7:22 10:19 12:2,5 doable 34:17 document 17:18 18:13 19:18 20:18,19,24 22:10 27:22 documentation 8:11 36:6 documents 4:17 5:17,22 6:3,9 7:18 8:18,23 9:2,21,24 15:15 16:6,9,12, 13 17:19,20 19:16 27:5,19 36:13 37:3 40:13 41:8, 10,11 55:22 57:2 61:2 Doe 50:18 download 17:11, 24 22:15 23:11 downloading 22:16 downloads 32:11 DR's 9:10 14:21 DR14 10:8 14:17 16:10 26:24 35:9 50:6
continually 40:7			
continuing 37:18 42:7 43:6			
contract 48:9,10			
contractor 48:13			
contractors 26:19			
contracts 8:1,4 9:6 48:16,17 56:4			
contractual 33:5 48:15			
copies 6:6,16,22 7:21,25 8:5,15,18 9:6 17:14 22:12 39:11 51:4,7,24			
copy 39:6 54:21, 22			
copying 40:15			
correct 5:12 10:13 22:10 24:4,10 25:20 26:2,16 27:1 35:22,23 44:1,8 55:2,17 61:7	Court's 56:6 covering 41:12 create 22:10 23:11 created 20:23 21:9 29:10 cross 55:17 cumulative 8:8 27:6 37:5 47:23 current 6:11 11:4, 6 28:9 41:6 42:25 43:5 45:2,5 53:22, 23 customer 5:16 6:16 20:3 23:19 24:2 29:12,17 30:20 31:1 37:15 43:14 55:23 customer's 31:2 customers 7:4 31:15,19 32:6	data 2:14 4:11 20:23 37:25 38:2 date 8:3,15 20:12 41:24 46:3,7 57:9, 10,13,16,17,19, 22,23 58:12,13 59:4 dated 6:6,17 7:23 day 26:22 45:11 51:23 54:4,5,18 55:1 56:13 days 32:10 43:8 59:6 December 16:2 decide 27:9 58:14 59:16 decided 6:9 8:8 decision 7:15 define 58:18 delay 4:16 9:25 16:4 delineate 36:15 depending 12:4 44:4,23 46:8 detail 19:18 details 19:5 determination 4:14 6:3 9:3 48:24 49:3 58:6,13 60:11 determine 5:25 7:14 8:12 9:16 difficulty 2:17	

DR19 14:2,16 57:11	62:3	12:11,12,14,23 25:24	folks 32:21,25 33:7 43:7
DR42 10:17 11:25 35:12 41:15	ends 4:12	extraordinarily 50:15	follow 50:11 56:6
DR44 7:24,25 10:25 42:16	engaging 5:25		forego 14:16
dropbox 3:23	engineer 24:24	<hr/> F <hr/>	forgot 50:25
dropped 25:21	enjoys 3:14		form 17:23
DRS 5:4,9 13:11 40:12,21 54:15 56:22 60:12	enter 3:3	faced 13:4	format 20:14
due 15:24 19:7	entire 20:3 56:5,11	fact 14:25	forms 43:18
duplicative 8:7 27:6 37:5 47:23 49:11	entities 49:10	facts 8:13	forward 41:24 51:11 54:3 55:25 58:10 59:9
duty 6:13 7:19 9:5 37:18 42:2 52:7	entitled 7:18 8:18	failed 4:16 8:10	found 51:14
	entity 15:6	fall 45:17 50:10	foundation 60:2, 16
<hr/> E <hr/>	entity's 9:17	falls 45:19	free 48:25
e-mail 42:3 51:8, 14 52:14,16	entity's 9:17	familiar 22:8	front 16:10 27:16 59:17
e-mailed 3:22	essentially 18:19	fee 12:7	frustrations 53:2
earlier 9:10 34:25	evidence 8:22 9:22 11:13 12:3, 19 19:9 46:22	fees 11:17	fulfilled 47:3
effect 8:2 9:8 51:5, 12,20,25 52:15 53:9 54:6 55:16 58:20	evidentiary 61:15	felt 37:2	full 9:4 33:6 45:3, 12
EFIS 60:8,23 61:14	Excel 19:11,15,17 25:17	file 15:12 17:14 23:2 59:4	fully 6:14 7:20
electronically 37:7	exhibit 16:14,16, 17 17:3 21:3 35:14 36:11,14 43:23,24	filed 4:10 16:3 51:9,19,21 53:9 60:8,23	<hr/> G <hr/>
Ellinger 3:9	exhibits 3:21 16:9 35:13 59:23 60:4, 17	filing 4:20 5:4 51:22	gain 6:2 7:2 8:21 9:20 12:13
employees 14:25 26:14 43:12	exist 22:11 23:2, 13 27:5	final 4:11 20:19 38:18	gallons 25:5,12,19
encompass 30:7	existence 17:22	finalize 4:15	gather 23:4,5 37:9
end 17:10,11 25:24 46:13	expected 39:8	finally 7:24	gave 36:5 45:5 46:12
ended 51:7,22	explain 15:21 20:24 43:13 49:1	find 14:5 34:12 39:7 59:8,12,13	general 15:19
	explained 33:12	fine 3:13 30:14	generally 13:6
	explanation 5:13, 14 25:6,7	five-year 10:23 50:7	give 8:23 9:1 13:14,16 24:21 27:12 28:7 42:25 49:21 51:24 56:22
	extent 46:19 48:16 54:17	flip 20:3 38:9 43:23	
	extra 11:15,17	focused 56:3	
		folder 23:2	

goal 55:21	46:6	ideal 57:12,16,23	59:9
good 2:6 13:14,16	homes 3:10 32:25 34:6,8	ideally 57:9	intend 58:10
gracious 56:20	Honor 3:20 30:15 35:10 39:20 40:9 41:16 53:17 58:3 59:4,22 61:1,20	ideas 32:2	internal 15:25
groupings 47:16	hook 35:1	identical 29:6	interrupt 44:7
guess 30:19 37:12,19 39:2,6, 12 45:20 46:25	hooking 35:4	identifiable 37:15	interrupted 56:18
guest 43:19	Hope 3:13	identified 46:1	invoice 23:12
guests 46:1	hours 26:22	imagine 15:17	invoices 23:15 33:10,17
guys 52:22	house 45:9	important 20:17 22:1	involved 33:21
<hr/> H <hr/>	huge 14:23 43:11	inaudible 18:6,21 40:24 57:2	involves 40:19
happened 15:24	hypothetical 53:25 55:12	include 33:7	involving 34:4 46:18
happily 15:15	hypothetically 29:22 54:3	including 18:11, 12	irrelevant 48:6
happy 33:9,17 45:6	<hr/> I <hr/>	incomplete 33:10 34:22	isolation 40:10,14
hard 17:14	I-70 2:10,11,14 3:8,10,19 4:13,24 5:5,15,16,25 6:2, 10,13,22,24 7:4,8, 18,22 8:1,3,8,16, 19,25 9:2,5,7,11, 19,23 10:17 14:19,21,25 15:9, 15,19,22 16:7 18:22 19:9,24 20:21,22 21:9 22:23 23:7 29:3 32:24 33:3,11 36:2 43:14,19 44:8,21 54:6	Incorporate 29:3	issue 9:18 15:16 33:15 43:3 47:11
hashtag 29:2	I-70's 4:16 7:13 9:3,9 11:24 12:12 15:11 33:16	Incorporated 2:10	issued 8:3
hear 49:16,17	i.e. 8:13	independent 26:19	issues 15:25 58:22
heard 34:2 52:6,11	I70's 5:20	individual 22:21 23:7,14,15 24:2 56:2	items 41:12
hearing 2:8,13,18, 22 3:2 44:13 46:11,13 50:17 56:11 58:13 59:21 60:1,5,10,13,14 61:15	idea 46:19	individually 22:15	<hr/> J <hr/>
hesitant 59:24		individuals 56:3	January 53:23
Hey 52:20		information 4:13, 19,24 5:1 6:10,14 7:9,10,16,17,19 8:9,23 9:15,16 14:5 24:23 27:8 28:20 29:8,12,16 36:12,23 42:11 48:13 55:24 56:15 59:2 61:16	John 2:25 50:18
Historical 20:9		inquired 20:21	joining 3:12
histories 19:11,15		inquires 43:19	judge 3:1 8:12 61:1
history 5:17 22:19		inquiring 15:11	judgment 58:25
hit 2:3		insufficient 9:4	July 5:16 6:6,18 7:4,13,23 8:2 10:14 24:15,18 30:6 38:3 41:24 54:2
Hobbs 3:11			June 2:7 5:9,20,21 7:7,8 14:7
Hold 19:20 35:15 43:25			jurisdiction 48:19, 20 58:14
home 26:20 40:20			

K**Kayla** 2:2,4 62:1,2**Kerr** 2:19,24 3:5,7,
18 4:4,9 5:12
10:3,7,14,21,24
11:4,7,10,14 12:4,
20 13:12,18,20,
22,25 14:4,12,20
16:5,11,18 18:21
21:25 27:15,17,21
28:17,24 30:1,3,
12 31:7,24 32:9,
20 33:10 34:6
35:17,20 36:7,14
41:21,25 42:10
49:20,22 50:23
51:1,18 52:13,19,
21,25 53:5 54:9,
11 57:8,15 59:13,
14 60:6,23 61:19,
23**kind** 19:11 27:19
30:1 32:2 46:6,10,
11 47:4 61:9**kinds** 41:19,23
44:21 45:19**KLIETHERMES**
2:4 62:2**L****labeled** 35:14**lack** 16:1**land** 32:25 33:14**language** 8:17,22
12:21**large** 24:25**law** 3:11 8:13 48:7**lead** 8:21 9:22
11:12 12:2,19
46:21**lease** 8:1,22 9:6,
12 32:25 43:15
44:7 46:2 47:2,6,8
48:2,4,13,15
54:21**leases** 8:4,15
11:1,2,5,20 12:18,
20,21 35:2 42:17,
21,22,25 45:2,18,
20,22,25 48:16
49:24,25 50:14,
19,22 51:4,7,11,
16,20,22,24 52:9,
10 53:9,23 54:6,
17,21 55:4,16
57:10,16,21**leasing** 47:7**ledger** 5:18**legacy** 50:11**legal** 6:4**lengthy** 17:6**lesser** 30:13**letter** 27:4**level** 13:7,24**likewise** 34:14**limit** 31:3**limited** 55:19 57:2,
4**lineage** 31:16,20**listening** 31:10**live** 15:1**log** 17:10**long** 42:6 50:7**longer** 14:15 47:5**looked** 36:10 46:7**loose** 4:11**lost** 24:6 41:6**lot** 6:9 15:7,1916:24 22:23 24:9
32:24 43:11 52:6**M****made** 4:21 34:2**mail** 17:13**mailed** 17:9 37:7**make** 3:21 6:4
7:15 9:2 17:19
21:9 39:22,25
48:5,24 51:3
58:11 60:11**makes** 31:9 44:11**making** 4:18 6:2**manning** 26:16**March** 4:22 54:5,7
55:16**mark-up** 22:1**marked** 18:23**marketing** 22:2**marking** 55:25**markup** 7:2 36:8**match** 29:19 37:14
38:20 55:20**matches** 36:10,18**math** 25:11**matter** 2:8 34:14**matters** 3:17**meaning** 38:8**meaningless** 41:8**means** 51:25 52:2**meant** 29:9,11,13
52:1**meet** 32:11**meter** 19:13 25:10**mid** 19:11**mid-2020** 19:12**mid-2021** 19:12**mind** 15:3 31:3
32:20 34:21 40:25**minimal** 45:17**minimum** 13:10
22:22 45:19**minute** 25:5**misleading** 45:1**Missouri** 2:9 7:7**Missouri's** 56:17**Mizzou** 3:11**mobile** 2:10,11,14
3:8,10,19 4:14
6:10 8:1 9:11 23:8
26:20 29:3 34:6,8
40:20 44:21 54:7**moment** 14:11
53:12**momentarily** 24:7**month** 16:21
17:24 20:2 21:11,
17 30:21,23 31:4,
5,21 37:1 43:1
51:24**monthly** 16:21
50:9,19**months** 5:8,18 6:7
9:14 13:16 15:24
16:23 30:20 31:2,
3 36:20,22 53:20,
21**motion** 2:8,12,13
3:16 4:7,10,14,18,
22,23 5:3,4 6:5,10
7:11 42:1 48:21
51:9 58:3,5 59:4,
7,21 60:1,5,9
61:16**motions** 51:9

move 35:11 49:14 58:10 59:9	numbered 18:8	order 37:22 38:25 39:3 56:6 58:11, 24,25	29:5 33:14 34:1 40:20 46:7 54:7 55:1
moving 40:8 54:3	numbers 5:6,10 6:19 18:13,20,25 19:6 25:4,8 47:24	ordering 54:1	Park's 2:14 4:14
multiple 4:19 40:13,14 52:11 58:22	<hr/> O <hr/>	organization 14:24 43:11	parks 33:22
multiplication 25:15	object 48:25 60:6, 18	organized 39:12	part 13:2 41:2 47:3 59:23
mysteries 25:1	objected 8:6	original 7:24,25 10:9 42:24	parties 41:3 42:13, 14 46:10 53:3
<hr/> N <hr/>	objection 27:4 47:25 61:13	originally 5:12 14:7 32:9	parties' 8:11
narrative 17:6	objections 26:24 35:12 42:19 49:11 54:13 60:4 61:17	originals 60:24	parts 24:25
narrow 6:9	obligated 4:25	overbroad 7:9 8:7 9:15	party 4:7 13:8
narrowed 6:5 7:12	obtaining 12:13	overly 5:23 13:5 26:24 29:24 40:18 46:13 47:19	past 6:23 9:14 22:19 48:11
nature 48:3	obvious 25:11	owners 14:25 25:25	Patrick's 54:5
necessarily 40:3 50:10	October 5:19	<hr/> P <hr/>	pay 7:3 17:12 21:12,18 26:10,12
needed 58:22	offer 59:22 60:17	p.m. 2:6	paying 12:6,7 23:8 33:8
needing 43:9	offered 45:12 61:14	pad 23:17 33:8,21 34:1	payment 5:21
neighborhood 29:23	offering 60:2	pads 34:12	payment/ nonpayment 38:18
nobody's 28:11	offerings 45:3	pages 16:13 18:8 19:16 20:18 21:2, 23 24:17 29:14 35:21 38:10 40:13,21 41:8,18 44:1	PDF 17:23 18:3,13 27:16,18
normal 59:6	office 26:9,10,17, 22 37:9	paired 21:16,18 36:17,18 38:19	people 22:12 26:12 30:25 31:11 33:25 40:19 45:8 50:18
note 21:13	online 26:5	paper 17:22	period 19:25 20:3, 10,15 36:5,10 38:11,14,16,22,23 39:1,3 43:2 53:18 54:3
noted 26:23	open 27:16 51:6, 22	paragraph 17:7	permanent 33:23
nothing's 28:7	operating 9:17 15:22	park 2:11 3:8,19 6:11 9:11 23:8	person 47:4
notice 61:2	operationally 27:14		personal 29:16
number 2:12 5:12 6:15,21 7:20 8:6, 17 9:4 14:8 15:14, 24 19:15 20:12 25:3 27:23 28:10, 15 29:1,2,3,7,15 34:3 36:17 37:24 45:7 55:5,6 56:19 57:19	operations 15:11 33:11		personally 15:8
number's 17:8	opportunity 56:23 59:1		
	opposition 2:15		

photocopy 37:9	presiding 3:1	25 47:2 50:19	<hr/> Q <hr/>
phrased 44:25	pretty 33:13,16	53:19,20,22 54:6, 16 55:8,15 56:4	
physical 37:17	prevented 56:21	provided 5:15 8:6, 16 15:15,20 16:7, 11 17:6 18:3	question 6:12,13 8:19 12:1,17 13:5 27:10 30:16 44:25 45:8 48:7,18,21 51:21 60:3
pick 31:4 54:4 57:9	previous 20:11 21:22	19:17 20:19 24:9, 11,12,18,19 28:3, 6 33:18 35:14 36:6,21,22,23 37:4 38:5,15,16 39:13,19 40:13 45:18 47:19,24 52:8 57:1,3	questionnaire 15:9
picked 31:1 50:17	previously 24:19	providing 8:20 9:19 22:12 38:2 42:19 45:20 48:4, 7,8,10 50:21 55:11,13	questions 8:13 9:23 10:2 15:14 22:5 49:18 56:19 59:18
picture 33:11	price 21:15	provision 6:1 36:2 48:15	<hr/> R <hr/>
place 7:13 47:9	print 22:21 23:3, 13,19 29:25	PSC 15:8,10,18 21:24 33:16	
play 26:5	printed 24:2	public 2:9 3:6 6:2, 23 7:22 9:20 10:18 12:2 28:20 33:3 55:22	raised 48:1
plenty 34:8	printing 22:16 23:1	publish 23:11	random 30:9 31:17 37:21
point 10:20 15:12 16:22 31:24 32:14 36:7 39:12 41:14 42:24 43:5 51:13 55:18 59:16 60:25	prior 24:10	pull 15:6 18:25 43:25	range 45:16,17
portal 17:9,20,25 18:5,17 20:14 21:10,23 22:18 23:20 26:6,8,12	privacy 56:2,9,14	pulled 15:22	rate 19:1,4 33:20
portion 33:16	problem 42:8 47:4 56:10	pulling 18:20 20:10	reading 44:13
position 39:18 41:17 54:2	problematic 40:7	pulls 29:16	readings 19:13 20:10,11 25:10
possibly 50:7	proceed 4:17	purpose 60:5	reason 18:21 42:1
post 20:12	proceeding 3:14	purposes 34:16	reasonable 49:13 58:17,18
posts 17:8	process 5:14 41:2	pushed 17:21	reasoning 59:25
practices 47:8	produce 39:11 43:9	put 25:23	received 3:21,23 6:23 7:22 15:9 37:4 60:13
precomplaint 20:21	produced 5:16 17:7 21:3 24:16 27:12 39:1	putting 59:17	receiving 32:21 33:1,8 45:9 46:5 47:9
preference 54:19 56:1	profile 53:19		recent 9:9
preliminary 3:17	program 5:19 17:16 18:20 29:16		record 2:3,6 3:4 10:6 56:12 59:23 60:25 61:2,25
present 6:7,18 7:13,24 10:15 30:6	property 34:7 35:4 43:18 45:14		recording 2:22 62:1
presented 43:20	propose 59:3		
presenting 4:7	protect 55:21		
presided 33:20 34:4	provide 6:14,16 7:19 8:10 9:5,24 17:16,18 18:2 31:15,16,17 33:3, 6,9,17 34:9 36:25 43:6 45:2,7,8,22,		

records 15:6,16,
19,20,22 23:7,8
37:7,8,9 39:12,14
61:6

redacted 29:13

redacting 55:24

referred 8:5

refuse 4:17

regard 6:21 29:8
31:12 41:14 48:21

regulatory 3:1

relate 41:10 50:4

relevance 41:13
48:1,22 49:11

relevancy 6:2 8:8,
13 9:3

relevant 6:12 7:14,
17 8:19 9:21
29:21 30:6 36:15
48:17 49:1,2,15
50:15

relieve 22:12

reluctant 58:24

remove 25:13

rent 11:18 13:2
23:17 33:9,14,24

rental 43:7 44:21

rentals 33:13,21

reply 59:7

report 19:25 20:8

reporter 2:16

reporters 2:17

reporting 21:10

reports 19:23
27:13

representative
30:5,21 31:8,21
32:24 33:6 34:11,

15 46:20 47:6,13,
15 49:24 50:1,2,9
54:20 55:9

representatives
44:20

request 6:16 7:12,
21 8:7 10:9,11,23
35:25 37:4 40:10
42:24 52:12,17
53:8 55:19 58:3

requested 7:17,18
8:17 9:1,15,16
36:24 42:20 43:3

requesting 37:11

requests 2:14
4:11,17 5:2 11:1
40:8,14

require 15:4 22:10
37:8 39:20 53:13

required 4:25 15:4
17:18,19 41:5

requires 9:4

requiring 24:22

resemble 23:19

reside 26:1

residences 33:23

resolved 42:5

resources 14:24
40:21,23 43:12
57:4

respect 34:25

respond 4:13
58:24 59:5 61:16

responded 5:5 7:4
14:9 45:14

respondent 2:11
8:14

response 8:4 9:3,
9 14:21 17:5

20:19 24:12,15,17
27:10 41:20 42:4
43:19 45:15
57:10,11 58:7,8,
12 60:19

responses 5:3
33:12 59:7,8,11
60:7,12

responsible 13:1

resulted 16:3

retain 39:8

retrievable 39:9

review 59:7

role 8:11

room 17:14

rule 7:16 58:16
61:6

rules 22:9 41:6
56:17 59:6

run 19:23,24

RV 32:25 33:13
34:1 35:4 43:7
45:9 47:17

RVS 34:25 35:1

S

sample 5:17 8:5
11:20 18:4,16,24
24:14 29:9,19
30:5 31:8,22
32:19,22,24 33:6
34:11,15 37:22,23
43:16,17 44:7,9
45:25 46:20
47:13,24 49:24
50:1,2,9 54:20
55:9 57:3

sampling 30:13

save 23:12

scheduling 2:17

Scratch 45:22

seasonality 46:8

seeking 30:19,25
36:19

sees 23:12

selecting 30:9

semi-permanent
33:23

sense 21:9 31:9

sentences 34:22

separate 11:18
45:8,24

separately 12:25

serve 33:22

service 2:9 3:6
5:15,21 8:20,24
12:15 14:22 28:21
31:5 32:22 33:1,3,
4 43:20 46:5
47:10 57:18

services 6:1,17
9:13,19 45:9

set 2:7 59:4

sewer 5:14 6:1,17,
21 8:20 9:11,13,
19 11:16,19
12:15,24 14:22
19:4,14 21:20
23:17 25:3 32:22
33:1,3,4,8,9,18
34:7 48:4,8,9 51:5
57:12,18

shared 56:15

shell 18:19

short 44:14

short-term 47:17

shortage 2:16

show 11:14,15,17 12:20 13:12,13 20:1 21:23 23:15 29:14	speaking 34:22	stayed 34:13 55:14 58:8,17	sustain 61:12
showing 5:19 18:24 19:12 29:10	specific 29:12 55:23	staying 46:24,25	sustained 61:17
shown 18:19	specifically 5:6,10 27:3 35:1	Stephanie 3:9	system 17:21 23:23 28:3
shows 19:3,25 21:15 36:16	spectrum 45:12	stop 52:20 62:1	systems 19:23
shy 10:12	spend 44:12	stopped 50:24	
side 32:16 45:17	spits 20:14	stops 39:16	<hr/> T <hr/>
sign 43:17 45:4	St 54:5	stored 37:7	table 21:7
signed 54:21	staff 2:9 3:17 4:8, 10 5:23 6:5,14,24 7:11,15,17,19 8:5, 9,17,18,25 9:1,5, 24 10:11 13:4 14:24 15:18,21,24 16:8 20:20 27:20 30:5,19 31:23 36:19 37:2 39:16, 21 41:20 42:20 44:25 46:20 47:2 48:4 49:8 54:3 57:7 58:9,12,24 59:6,10 60:3	story 35:5	taking 14:22 31:5 39:18
significant 15:4 40:22	staff's 4:7 7:25 13:9 34:16 41:13, 17 47:4 54:1 58:7, 8 61:12	straight 36:13	talk 12:21 58:5
silence 2:1	start 25:11 30:1 55:23,24	structurally 27:14	talked 23:24 34:17 58:4
simply 27:5 48:1	started 2:4	student 3:11	talking 14:23 15:1 16:5 17:1,2 18:1 31:18 32:5 33:2 34:11,25 36:4 41:1,4 47:14 50:3, 5,6,7,8 53:16,18 54:2 61:4,5
single 28:5,11	starting 14:17 16:15	stumbling 42:23	tax 21:13,15
sitting 15:5 17:14 23:2 26:21 58:6	state 6:11 8:23 15:1 26:1 34:20 58:19	substantial 33:16	taxes 23:8
situation 34:19	statement 18:14 23:22	substantially 27:11	tenant 6:17 7:5 11:1 17:8,17 18:5, 17 23:12 27:24 28:2 30:24 36:9 38:17,19 42:22 43:19 44:5,24
size 34:19	statements 18:22	success 4:23	tenant's 23:7
slightly 19:7 45:1	statute 60:22	sufficient 7:10,14 13:7,11,24 16:6 28:13,16 34:15 47:13 54:10 60:10 61:15	tenants 5:15 6:20 7:1 8:2,16,21,24 9:7,11 12:6,7,10 14:8,10,22 16:20 17:10 21:17,18 22:14,17,23 26:5 28:5,11 30:23 31:5 32:24 33:4,7 35:2 38:2 42:21, 22 43:18 45:7,13 46:4 47:14 50:7, 10,14 57:11,18,
small 14:20 15:2 39:13	stay 31:11 33:25	suggestion 60:24	
smaller 30:7		summarization 61:10	
snapshot 13:15, 17 45:10 46:3,6		summarized 21:11,22 36:12	
software 5:18 17:16 23:5		summarizes 21:14	
solution 59:3		summary 4:14 5:20 21:8 36:11 58:5,13,25	
somebody's 47:2		supplement 52:7	
sort 23:5 38:7 48:14		supplements 40:12	
sounded 49:7		suppose 28:18	
spattering 31:17		supposed 43:1	

19,21	11 53:17,22 54:1 56:12 57:5	unit 25:7 27:23 28:12,15 29:2,7, 15	W
tens 25:12	top 18:14 29:4	units 25:6,8	Wait 20:5 35:15
term 23:1 44:14	total 37:24	universe 56:5	waiting 15:6
terms 33:5	totality 40:22	unlawful 5:25	walked 36:6
that'll 57:12	tranches 40:14	unlimited 14:24	wall 49:9
theoretically 54:25 55:6	transcribed 2:23	unreasonable 58:16 59:12,13	wanted 3:20 6:24 31:1 32:10 35:9 36:8 37:10 41:15 50:24 56:21
thereto 2:15	transient 42:23	unsure 10:19	water 5:14,19 6:1, 17,20,22,23,25 7:3,7,12,21,22,23 8:20 9:11,13,19 10:18 11:16,19 12:2,5,9,10,15,24 14:22 19:3,14 21:12,19 23:17 25:2,23 28:20 32:21 33:1,4,8,9, 18 34:7 36:1 37:17 38:4,18 41:5,19 48:4,8,9 51:5,13,15 57:12, 18
thing 10:17 25:2 37:12 40:9,16 47:3 55:12	transitory 30:25	update 5:1 37:18 41:5 42:2,3 53:13	ways 4:19
things 22:12 29:15 31:12 51:1 55:25	travel 15:4	updated 5:3 6:15 7:21 14:5 27:13 42:10 52:2	WC-2022-0295 2:12
thinks 16:6	true 10:17	updates 5:6,9 14:3	weather 46:8
thought 24:6,20 43:12 49:7	turn 18:3 19:10 24:13	usage 5:19 19:3,4, 13 21:12 25:2,3, 10,14 36:17	week 44:14 45:3 51:14,23
thousand 25:13	turnover 15:25	utilities 12:22,25 25:1 30:10 34:1 35:2,3 44:16 47:9	weekend 33:25 43:8 46:24 47:2
thousands 41:7	type 15:6	utility 5:21 8:20,24 9:17,21 12:14 20:9 45:9 46:5	whatsoever 25:6
tie 4:11	types 46:1	V	witnesses 2:18,20
tied 47:8	U	vacation 33:21	work 31:22 40:11 46:18
time 2:8 15:12,13 19:25 24:11 27:12 31:12,17 32:13 33:24 38:22,23 39:1 42:6 44:12, 25 46:2 51:3,6,13, 21 52:16,17,24 56:24 57:2,5 58:6, 8,17,18 59:5,19, 25 61:13,21	Uh-huh 16:18 20:6 21:8 23:25 44:18	values 56:2	works 20:25
timeline 32:11	ultimate 48:6	verify 27:24 28:8	worried 32:13,15
times 4:19 16:21, 22 18:1 19:3,4 25:2,3 34:3 52:11 56:19	ultimately 15:25	versus 2:10 45:9, 10 46:5	
tiny 45:9 46:6	unable 3:24	view 18:18,22	
today 2:8,13 3:2 5:8 15:16 27:12 42:5 43:5,14 52:6,	unaware 33:13	violated 48:14	
	unclear 34:24	virtually 41:12	
	uncomfortable 59:11	voluntarily 15:15 20:23 57:1,3	
	understand 22:21 24:8 35:4 45:21 53:7,8,24 54:24 56:13		
	understanding 37:20 61:11		
	understood 52:5, 12		
	unheard 34:3		

worth 7:6,10 10:9,
12 55:13

written 4:22

Y

year 7:12 13:14,23
15:19 16:2,4,6,8
21:11 24:22 27:7,
8 28:6 31:8,11,15,
19,20 32:7,8
34:13,14 36:2,5,
20,25 37:10,11,13
38:2,12 39:13,19
40:1 43:4 47:15
49:25 50:2,8,12
55:1,15

year's 7:6,10
10:12 55:13

year-long 31:16

years 5:15,22 6:8,
24 7:8 11:2 33:24
36:4 39:15,16
40:6 50:2,4 53:23

years' 10:9