

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

Staff of the Missouri Public Service Commission )  
)  
)  
Complainant, )  
v. )  
)  
Cedar Green Land Acquisition, LLC, )  
and Gary F. Myers, Owner )  
)  
Respondents. )

**Case No. WC-2013-0087**

**STAFF'S RESPONSE TO CEDAR GREEN LAND ACQUISITION, LLC'S  
AFFIRMATIVE DEFENSES**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Commission"), by and through counsel, and for its *Response to Cedar Green Land Acquisition's Affirmative Defenses* respectfully states as follows:

**AFFIRMATIVE DEFENSES**

1. Complainant is without sufficient information or belief to admit or deny the allegations contained in paragraph 1 and therefore denies the same.
2. Complainants agree that there was never any interruption to service, but are without sufficient knowledge to admit or deny any other statement in paragraph 2 and therefore deny the same.
3. Complainant is without sufficient information or belief to admit or deny the allegations in paragraph 3 and therefore deny the same.
4. Complainants deny the allegations set forth in paragraph 4.
5. Complainant is without sufficient information or belief to admit or deny the allegations in paragraph 5 and therefore deny the same.

6. Complainant is without sufficient information or belief to admit or deny the allegations in paragraph 6 and therefore deny the same.

7. Complainant is without sufficient information or belief to admit or deny the allegations in paragraph 7 and therefore deny the same.

8. Complainants deny the allegations set forth in paragraph 8.

9. Complainant is without sufficient information or belief to admit or deny the allegations in paragraph 9 and therefore deny the same.

**WHEREFORE**, Staff submits its *Response* and prays that the Commission will find the Respondents in violation of the laws of the State of Missouri, including, but not limited to, §393.130 and §386.310 as alleged in the *Complaint* and dismiss the affirmative defenses alleged against Complainant in this matter, and grant any other relief as deemed appropriate by the Commission.

Respectfully submitted,

**/s/ Meghan McClowry**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 5th day of November, 2012.

**/s/ Meghan McClowry**