

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

The Staff of the Missouri Public Service Commission,)	
)	
Complainant,)	Case No. WC-2008-0079
)	
v.)	
)	
Universal Utilities, Inc., and Nancy Carol Croasdell,)	
)	
Respondents.)	

PUBLIC COUNSEL’S REQUEST FOR LOCAL PUBLIC HEARING

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Request for Local Public Hearing states as follows:

1. On September 13, 2007, the Staff of the Missouri Public Service Commission (Staff) filed a Complaint and Motion for Expedited Treatment with the Missouri Public Service Commission (Commission) against Universal Utilities, Inc. (Universal Utilities) and Nancy Carol Croasdell.
2. Staff’s filing states that the complaint arises from Respondents’ unlawful provision of water and sewer services to the public for gain, without certification or other authority from the Commission.
3. Staff’s filing also states that Universal Utilities sells water and sewer services to the residents of Blue Acres Mobile Home Park (Blue Acres), which is located in Columbia, Missouri.
4. Staff’s filing further states that the Commission sought a temporary restraining order and injunction in the Circuit Court for Boone County, Missouri, on September 12, 2007, due to Universal Utilities threatening to disconnect water services to customers.

5. Public Counsel requests that the Commission schedule a Local Public Hearing in the Columbia, Missouri area regarding this matter. A Local Public Hearing will provide an opportunity for the Commission to gather information regarding customers' concerns and experience regarding service quality and service reliability as well as information regarding rates that have been charged for water and sewer services and any additional fees to which the residents have been subjected.

6. Public Counsel suggests that a convenient location for the Local Public Hearing would be the LeMone Building, 3215B LeMone Industrial Blvd., Columbia, MO. This location has been successfully used in the past for public hearings and is very near to Blue Acres so as to be convenient for residents to attend. However, if the Local Public Hearing cannot be held in this location, Public Counsel requests that it be held in a convenient location at the Commission's choosing.

7. Public Counsel would not object to the Commission scheduling this hearing promptly, so long as customers are given sufficient notice.

WHEREFORE, Public Counsel respectfully requests that the Commission grant Public Counsel's request for a Local Public Hearing.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Christina L. Baker

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 18th day of September 2007:

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