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March 2, 2006

The Honorable Colleen M. Dale
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

FILED⁴

MAR 02 2006

Missouri Public
Service Commission

Re: Case Nos. WC-2006-0082, et al.

Dear Judge Dale:

Please find enclosed for filing in the referenced matters the original and five copies of the Answer of Respondent Folsom Ridge, L.L.C.

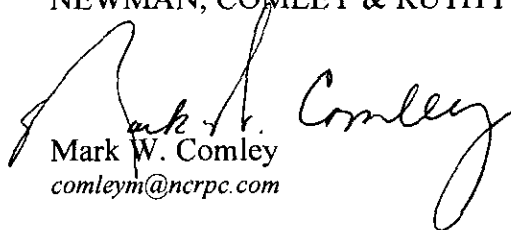
Would you please bring this filing to the attention of the appropriate Commission personnel.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley
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MWC:ab
Enclosure

cc: Office of Public Counsel
General Counsel's Office
Cathy Orlor
Cindy Fortney
Dean Leon Fortney
Judy Kenter
Benjamin D. Pugh

Joseph J. Schrader
Stan Temares
Ben F. Weir
Duane Stoyer
Charles E. McElyea
Reginald V. Golden

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

Cathy J. Orlor, et al.)
)
 Complainants,)
 v.)
)
Folsom Ridge, LLC,)
)
 Respondent.)

Case No. WC-2006-0082, et al.

FILED⁴

MAR 02 2006

Missouri Public
Service Commission

ANSWER OF RESPONDENT FOLSOM RIDGE, L.L.C.

Answer to Cathy Orlor Complaint

Comes now Respondent Folsom Ridge, L.L.C. (Folsom Ridge) and answers and responds to the complaint of Cathy Order (previously assigned Case No. WC-2006-0082) (hereinafter "Orler's complaint") paragraph by paragraph as follows:

1. Folsom Ridge is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 1 of Orler's complaint and therefore denies same.

2. Folsom Ridge admits that it is a limited liability company organized under the laws of the state of Colorado but otherwise denies each and every allegation contained in paragraph 2 of Orler's complaint.

3. Denied.

4. Folsom Ridge denies each and every other allegation contained in Orler's complaint not specifically admitted herein.

5. In further answer and defense, Folsom Ridge states that Orler's complaint fails to state a claim upon which relief may be granted by the Commission and should be dismissed. Furthermore, Orler's complaint has not been pleaded with sufficient definiteness or particularity

to enable Folsom Ridge to properly prepare generally for hearing, and unless made more definite and certain should be dismissed.

WHEREFORE, Respondent Folsom Ridge prays that the complaint of Cathy Order be dismissed and held for naught; and for such other and further relief as the Commission deems just and proper.

Answer to Benjamin D. Pugh Complaint

Comes now Respondent Folsom Ridge, L.L.C. and answers and responds to the complaint of Benjamin D. Pugh (previously assigned Case No. WC-2006-0090) (hereinafter "Pugh's complaint") paragraph by paragraph as follows:

1. Folsom Ridge is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 1 of Pugh's complaint and therefore denies the same.

2. Folsom Ridge admits that it is a limited liability company organized under the laws of the state of Colorado but otherwise denies each and every allegation contained in paragraph 2.

3. Denied.

4. Folsom Ridge denies each and every other allegation contained in Pugh's complaint not specifically admitted herein.

5. In further answer and defense, Folsom Ridge states that Pugh's complaint fails to state a claim upon which relief may be granted by the Commission and should be dismissed. Furthermore, Pugh's complaint has not been pleaded with sufficient definiteness or particularity to enable Folsom Ridge to properly prepare generally for hearing, and unless made more definite and certain should be dismissed

WHEREFORE, Respondent Folsom Ridge prays that the complaint of Benjamin D. Pugh be dismissed and held for naught; and for such other and further relief as the Commission deems just and proper.

Answer to Ben F. Weir Complaint

Comes now Respondent Folsom Ridge, L.L.C. and answers and responds to the complaint of Ben F. Weir (previously assigned Case No. WC-2006-0107) (hereinafter "Weir's complaint") paragraph by paragraph as follows:

1. Folsom Ridge is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 1 of Weir's complaint and therefore denies same.

2. Folsom Ridge admits that it is a limited liability company organized under the laws of the state of Colorado but otherwise denies each and every allegation contained in paragraph 2.

3. Denied.

4. Folsom Ridge denies each and every other allegation contained in Weir's complaint not specifically admitted herein.

5. In further answer and defense, Folsom Ridge states that Weir's complaint fails to state a claim upon which relief may be granted by the Commission and should be dismissed. Furthermore, Weir's complaint has not been pleaded with sufficient definiteness or particularity to enable Folsom Ridge to properly prepare generally for hearing, and unless made more definite and certain should be dismissed.

6. In further answer and defense, Folsom Ridge states that complainant lacks standing to bring the complaint.

WHEREFORE, Respondent Folsom Ridge prays that the complaint of Ben F. Weir be dismissed and held for naught; and for such other and further relief as the Commission deems just and proper.

Answer to Stan Temares Complaint

Comes now Respondent Folsom Ridge, L.L.C and answers and responds to the complaint of Stan Temares (previously assigned Case No. WC-2006-0120) (hereinafter "Temares' complaint") paragraph by paragraph as follows:

1. Folsom Ridge is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 1 of Temares' complaint and therefore denies same.

2. Folsom Ridge admits that it is a limited liability company organized under the laws of the state of Colorado but otherwise denies each and every allegation contained in paragraph 2.

3. Denied.

4. Folsom Ridge is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 4 of Temares' complaint and therefore denies same.

5. Folsom Ridge denies each and every other allegation contained in Temares' complaint not specifically admitted herein.

6. In further answer and defense, Folsom Ridge states that Temares' complaint fails to state a claim upon which relief may be granted by the Commission and should be dismissed. Furthermore, Temares' complaint has not been pleaded with sufficient definiteness or

particularity to enable Folsom Ridge to properly prepare generally for hearing, and unless made more definite and certain should be dismissed

WHEREFORE, Respondent Folsom Ridge prays that the complaint of Stan Temares be dismissed and held for naught; and for such other and further relief as the Commission deems just and proper.

Answer to Judy Kenter Complaint

Comes now Respondent Folsom Ridge, L.L.C. and answers and responds to the complaint of Judy Kenter (previously assigned Case No. WC-2006-0121) (hereinafter "Kenter's complaint") paragraph by paragraph as follows:

1. Folsom Ridge is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 1 of Kenter's complaint and therefore denies same.
2. Folsom Ridge admits that it is a limited liability company organized under the laws of the state of Colorado but otherwise denies each and every allegation contained in paragraph 2.
3. Denied.
4. Folsom Ridge denies each and every other allegation contained in Kenter's complaint not specifically admitted herein.
5. In further answer and defense, Folsom Ridge states that Kenter's complaint fails to state a claim upon which relief may be granted by the Commission and should be dismissed. Furthermore, Kenter's complaint has not been pleaded with sufficient definiteness or

particularity to enable Folsom Ridge to properly prepare generally for hearing, and unless made more definite and certain should be dismissed.

WHEREFORE, Respondent Folsom Ridge prays that the complaint of Judy Kenter be dismissed and held for naught; and for such other and further relief as the Commission deems just and proper.

Answer to Joseph J. Schrader Complaint

Comes now Respondent Folsom Ridge, L.L.C. and answers and responds to the complaint of Joseph J. Schrader (previously assigned Case No. WC-2006-0122) (hereinafter "Schrader's complaint") paragraph by paragraph as follows:

1. Folsom Ridge admits that Joseph J. Schrader is a permanent resident of the state of Florida and owns no property in the state of Missouri.

2. Folsom Ridge admits that it is a limited liability company organized under the laws of the state of Colorado but otherwise denies each and every allegation contained in paragraph 2.

3. Denied.

4. Folsom Ridge denies each and every other allegation contained in Schrader's complaint not specifically admitted herein.

5. In further answer and defense, Folsom Ridge states that Schrader's complaint fails to state a claim upon which relief may be granted by the Commission and should be dismissed. Furthermore, Schrader's complaint has not been pleaded with sufficient definiteness or particularity to enable Folsom Ridge to properly prepare generally for hearing, and unless made more definite and certain should be dismissed.

6. In further answer and defense, Folsom Ridge states that complainant lacks standing to bring the complaint.

WHEREFORE, Respondent Folsom Ridge prays that the complaint of Joseph J. Schrader be dismissed and held for naught; and for such other and further relief as the Commission deems just and proper.

Answer to Duane Stoyer Complaint

Comes now Respondent Folsom Ridge, L.L.C. and answers and responds to the complaint of Duane Stoyer (previously assigned Case No. WC-2006-0129) (hereinafter "Stoyer's complaint") paragraph by paragraph as follows:

1. Folsom Ridge admits paragraph 1 and further answers that based upon counsel's information and belief, Duane Stoyer is a permanent resident of Washington, Missouri and does not reside on Big Island in the Lake of the Ozarks.

2. Folsom Ridge admits that it is a limited liability company organized under the laws of the state of Colorado but otherwise denies each and every allegation contained in paragraph 2.

3. Denied.

4. Folsom Ridge is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 4 complaint and therefore denies same.

5. Folsom Ridge denies each and every other allegation contained in Stoyer's complaint not specifically admitted herein.

6. In further answer and defense, Folsom Ridge states that Stoyer's complaint fails to state a claim upon which relief may be granted by the Commission and should be dismissed. Furthermore, Stoyer's complaint has not been pleaded with sufficient definiteness or particularity

to enable Folsom Ridge to properly prepare generally for hearing, and unless made more definite and certain should be dismissed.

7. In further answer and defense, Folsom Ridge states that complainant lacks standing to bring the complaint.

WHEREFORE, Respondent Folsom Ridge prays that the complaint of Duane Stoyer be dismissed and held for naught; and for such other and further relief as the Commission deems just and proper.

Answer to Cindy Fortney Complaint

Comes now Respondent Folsom Ridge, L.L.C. and answers and responds to the complaint of Cindy Fortney (previously assigned Case No. WC-2006-0138) (hereinafter "C. Fortney's complaint") paragraph by paragraph as follows:

1. Folsom Ridge is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 1 the complaint and therefore denies same.

2. Folsom Ridge admits that it is a limited liability company organized under the laws of the state of Colorado but otherwise denies each and every allegation contained in paragraph 2.

3. Denied.

4. Folsom Ridge is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 4 of the complaint and therefore denies same.

5. Folsom Ridge denies each and every other allegation contained in C. Fortney's complaint not specifically admitted herein.

6. In further answer and defense, Folsom Ridge states that C. Fortney's complaint fails to state a claim upon which relief may be granted by the Commission and should be

dismissed. Furthermore, C. Fortney's complaint has not been pleaded with sufficient definiteness or particularity to enable Folsom Ridge to properly prepare generally for hearing, and unless made more definite and certain should be dismissed.

WHEREFORE, Respondent Folsom Ridge prays that the complaint of Cindy Fortney be dismissed and held for naught; and for such other and further relief as the Commission deems just and proper.

Answer to Dean Leon Fortney Complaint

Comes now Respondent Folsom Ridge, L.L.C. and answers and responds to the complaint of Dean Leon Fortney (previously assigned Case No. WC-2006-0139) (hereinafter "D. Fortney's complaint") states as follows:

1. Folsom Ridge admits paragraph 1 and further answers that based upon counsel's information and belief, Dean Leon Fortney is a permanent resident of Louisburg, Kansas and does not reside on Big Island in the Lake of the Ozarks.

2. Folsom Ridge admits that it is a limited liability company organized under the laws of the state of Colorado but otherwise denies each and every allegation contained in paragraph 2.

3. Denied.

4. Folsom Ridge is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 4 of the complaint and therefore denies same.

5. Folsom Ridge denies each and every other allegation contained in D. Fortney's complaint not specifically admitted herein.

6. In further answer and defense, Folsom Ridge states that D. Fortney's complaint fails to state a claim upon which relief may be granted by the Commission and should be dismissed. Furthermore, D. Fortney's complaint has not been pleaded with sufficient definiteness or particularity to enable Folsom Ridge to properly prepare generally for hearing, and unless made more definite and certain should be dismissed.

7. In further answer and defense, Folsom Ridge states that complainant lacks standing to bring the complaint.

WHEREFORE, Respondent Folsom Ridge prays that the complaint of Dean Leon Fortney be dismissed and held for naught; and for such other and further relief as the Commission deems just and proper.

ANSWERS AND DEFENSES COMMON TO ALL COMPLAINTS

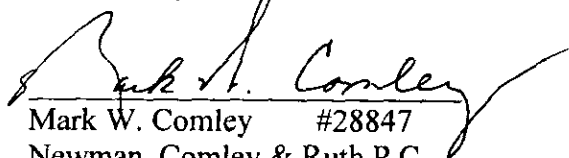
To the extent any complaint seeks relief from this Commission in the form of an injunction or other equitable decree, Folsom Ridge moves that such request for relief be stricken because the Commission is powerless, and has no jurisdiction, to enter decrees in equity.

To the extent any complaint alleges violations of the environmental laws or regulations of the United States or the State of Missouri, or the laws and regulations applicable to corporate governance and operation as a basis for any form of relief in this Commission, Folsom Ridge moves that those allegations be stricken.

CONCLUSION

WHEREFORE, having fully answered each complaint and setting out its additional responses and defenses, Folsom Ridge prays the Commission dismiss each and every complaint and enter such other relieve the Commission deems just and proper.

Respectfully submitted,



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Attorneys for Folsom Ridge, LLC

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 2nd day of March, 2006, to General Counsel's Office at gencounsel@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov; and via U.S. Mail, postage prepaid, to:

Cathy Orler, 3252 Big Island Drive, Roach, MO 65787,
Cindy Fortney, 3298 Big Island Drive, Roach, MO 65787,
Dean Leon Fortney, P.O. Box 1017, Louisburg, KS 66053,
Judy Kenter, 1794 Big Island Drive, Roach, MO 65787,
Benjamin D. Pugh, 1780 Big Island Drive, Roach, MO 65787,
Joseph J. Schrader, 1105 Yorktown Pl., DeLand, FL 32720,
Stan Temares, 371 Andrews Trail Court, St. Peters, MO 63376,
Ben F. Weir, 3515 SW Meyer Blvd., Blue Springs, MO 64015,
Duane Stoyer, 702 Ridgeview Dr., Washington, MO 63090,
Charles E. McElyea, P.O. Box 559, Camdenton, MO 65020.

