

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

FILED³

NOV 17 2006

Missouri Public
Service Commission

The staff of the Missouri Public Service)
Commission,)
)
Complainant,)
v.)
)
Franklin County Service Company, Melody)
Lake Water & Sewer, LLC, Melody Lake)
Ranch Associates, Inc., Gerald Johnson.)

Case No.: WC-2006-0363

MOTION FOR RECONSIDERATION

Come now Baylard, Billington & Dempsey, P.C. and Gordon Rolla Upchurch and moves the Commission to accept "Withdraw of Attorney Downard" for the parties for whom the undersigned has entered his appearance, on the grounds that:

1. The undersigned has been retained by Melody Lake Water & Sewer, LLC and Melody Lake Ranch Associates, Inc. to represent them in this matter and conclude by termination of regulation the water service referenced herein.

2. The undersigned stands ready to conclude this matter, and has cooperation and consent of my clients to do so.

Wherefore, the undersigned moves for the Commission's Orders, as it deems necessary to permit entry by the undersigned, and for further action, necessary to terminate tariff and regulations of the water service at issues and for such other and further relief, and is meet and just.

Respectfully submitted,

BAYLARD, BILLINGTON & DEMPSEY, P.C.

By: 

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ATTORNEY FOR MELODY LAKE
WATER & SEWER LLC and MELODY
LAKE RANCH ASSOCIATES, INC.

THIS IS TO CERTIFY that a copy of the above and foregoing was mailed on November 16, 2006 to: General Counsel Office, Missouri Public Service Commission, 200 Madison Street, Suite 800, PO Box 360, Jefferson City, MO 65102; Mills Lewis, Office of Public Counsel, 200 Madison Street, Suite 650, PO Box 2230, Jefferson City, MO 65102; Robert Franson, Missouri Public Service Commission, 200 Madison Street, Suite 800, PO Box 360, Jefferson City, MO 65102, Gerald Johnson, 333 Playmor Drive, Leslie, MO 63056, Jonathan Downard, 80 North Oak Street, Union, MO 63084.


GORDON ROLLA UPCHURCH