

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

The Staff of the Missouri Public Service Commission,	)	
	)	
	)	
Complainant,	)	
	)	
v.	)	
	)	
Aspen Woods Apartment Associates, L.L.C.,	)	
Barry Howard, Aspen Woods Apartments,	)	
Sapal Associates, Sachs Investing Co.,	)	
Michael Palin, Jerome Sachs, and National	)	
Water & Power, Inc.	)	
Respondents.	)	

**File No. WC-2010-0227**

**ORDER GIVING NOTICE OF DEFICIENCY AND DIRECTING FILINGS  
TO CORRECT DEFICIENCY OR TO SHOW CAUSE**

Issue Date: March 4, 2010

Effective Date: March 4, 2010

On January 29, 2010, the Staff of the Missouri Public Service Commission ("Staff") filed a complaint with the Commission against the Respondents listed above. Notice was issued on February 2, 2010, and the Respondents were directed to answer no later than March 4, 2010. On March 3, 2010, National Water and Power Services Corporation ("NWPSC") attempted to file an answer. The answer was submitted by Michael Foote, Corporate Counsel. Mr. Foote, Colorado Bar No. 32249, has not established that he is authorized to practice law in the State of Missouri. Mr. Foote must seek approval of this State's Supreme Court to appear *pro hac vice*, and must comply with this Commission's rules in order to appear and practice before this Commission. While Mr. Foote's attempt to answer the complaint on behalf of NWPSC is appreciated, the answer is not in compliance with the laws of this state or the Commission's rules.

MWPSC will be directed to correct the deficiencies or show cause why it should not be held in default and all of Staff's allegations be deemed admitted. A copy of the Commission's procedural rules and the relevant Missouri Supreme Court Rules will be attached to this order.

**THE COMMISSION ORDERS THAT:**

1. No later than March 12, 2010, National Water and Power Services Corporation shall correct the deficiencies in its answer.
2. If National Water and Power Services Corporation fails to correct the deficiencies in its answer, then no later than March 19, 2010 it shall show cause why its answer should not be rejected, it be found in default, and the factual allegations in the Staff of the Missouri Public Service Commission's complaint be deemed admitted.
3. This order shall become effective immediately upon issuance.

**BY THE COMMISSION**



**Steven C. Reed  
Secretary**

( S E A L )

Harold Stearley, Senior Regulatory Law Judge,  
by delegation of authority pursuant to  
Section 386.240, RSMo 2000.

Dated at Jefferson City, Missouri,  
on this 4th day of March, 2010.