

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

In the Matter of an Investigation)	
Into the Operations and Condition of)	<u>Case No. WO-2019-0247</u>
Rex Deffenderfer Enterprises, Inc., d/b/a)	
RDE Water Company)	

NOTICE OF CONTINUED NON-RESPONSE TO DATA REQUESTS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its Notice of Continued Non-Response to Data Requests states as follows:

1. On July 10, 2019, the Commission filed its *Order Directing RDE Water Company to Respond to Staff's Data Requests* ("Order") ordering RDE Water Company to respond to Staff's outstanding data requests no later than July 30, 2019.

2. Since the issuance of the Commission's Order, the only correspondence Staff has received from RDE Water Company are two emails from the Company's general manager, sent to the Manager of Staff's Water and Sewer Department, on July 30, 2019 and August 1, 2019. These emails expressed frustration with amount of information sought by Staff, and stated that it is time-consuming to compile. The emails also contained general information at least partially responsive to Staff DRs 0020, 0025, 0043, 0046, and 0047. The emails did not contain information responsive to any other Staff Data Requests.

3. Outside of the general information contained in the Company's July 30, and August 1, 2019, emails, Staff has not received responses to its submitted Data Requests. Staff's initial Data Requests in this matter were issued on March 26, 2019; RDE Water Company has been allowed more than ample opportunity to compile necessary information and respond.

WHEREFORE, Staff respectfully submits this Notice of Continued Non-Response to Data Requests, and prays the Commission will issue an order finding RDE Water Company to be in violation of its July 10, 2019, Order, and authorizing its General Counsel to bring a penalty action in circuit court pursuant to Section 386.570, RSMo; and grant such other and further relief as the Commission deems just in the circumstances.

Respectfully submitted,

/s/ Mark Johnson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was delivered to the parties and/or their counsel of record by U.S. Postal Service postage prepaid, or by hand, or served electronically, on this 6th day of August, 2019.

/s/ Mark Johnson