

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

The Staff of the Missouri Public Service Commission,)	
)	
Complainant,)	
)	<u>File No. WC-2022-0295</u>
v.)	
)	
I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park.)	
)	
Respondent.)	

ORDER DIRECTING STAFF RESPONSE

Issue Date: June 16, 2022

Effective Date: June 16, 2022

On June 3, 2022, the Commission’s Staff (Staff) filed *Complainant's Request for Permission for Entry upon Land for Inspection*. Staff requested to enter onto Respondent’s property to inspect, measure, survey, photograph, test, or sample on the property as part of discovery.

On June 13, 2022, I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park filed *Respondent's Objection to Complainant's Request for Permission for Entry upon Land for Inspection and Motion for Protective Order*. I-70 Mobile City Park objects and states that Staff’s request seeks information that is not relevant, is unduly burdensome, and the request is not proportional to the needs of this case. Respondent asserts that the request is duplicative of already submitted data requests and is made for the purpose of vexing and harassing Respondent. Respondent also seeks a motion for a protective order to prohibit Staffs inspection request.

The Commission will direct Staff to file a response to the objections and motion for a protective order. Staff’s response shall address why entry onto the property is

necessary and why less invasive means of obtaining the requested information are insufficient. Further Staff shall address the relevance and good cause for its request. Additionally, Staff shall address the Commission's authority to order I-70 Mobile Park to allow entry onto the private property of an unregulated entity.

THE COMMISSION ORDERS THAT:

1. Staff shall respond to I-70 Mobile Park's objections and motion for a protective order no later than June 29, 2022.
2. This order shall be effective when issued.



BY THE COMMISSION

A handwritten signature in cursive script that reads "Morris L. Woodruff".

Morris L. Woodruff
Secretary

John T. Clark, Senior Regulatory Law Judge,
by delegation of authority pursuant to
Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 16th day of June, 2022.

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 16th day of June, 2022.




Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

June 16, 2022

File/Case No. WC-2022-0295

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Morris L. Woodruff
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.