

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

The Office of Public Counsel)	
)	
Complainant,)	
)	
vs.)	<u>Case No. WC-2016-0252</u>
)	
Moore Bend Water Utility, LLC,)	
)	
Respondent.)	

MOTION FOR PROPOSED PROCEDURAL SCHEDULE

COME NOW the Office of the Public Counsel (“OPC”) and for its Motion for their Proposed Procedural Schedule state as follows:

1. On September 28th of 2016, the Public Service Commission (“Commission”) ordered OPC’s Complaint in the above-captioned matter against Moore’s Bend Water Utility, LLC (“Moore’s Bend”) amended as pled and ordered this office to file a “mediation status report no later than October 11, 2016”.

2. OPC avers to the Commission the parties of this action have met informally on June 15th and August 5th of this year to discuss the issues of this Complaint and, while these meetings have led to OPC amending its complaint, issues still persist that are not resolving themselves by agreement. OPC states a mediation will not result in a productive resolution as there are issues that, at this time, remain irreconcilable.

3. OPC therefore proposes an expedited procedural schedule to the Commission as follows:

OPC Direct Testimony	October 21, 2016
Moore’s Bend Rebuttal Testimony	November 3, 2016
OPC Surrebuttal Testimony	November 17, 2016

Issues List, Order Cross, Etc.	November 23, 2016
Position Statements	November 30, 2016
Evidentiary Hearing	December 9, 2016
Post-Hearing Briefs	December 16, 2016
Report and Order	December 22, 2016

4. This proposed schedule is expedited as the issues remaining in the amended Complaint involve allegations that Moore’s Bend is operating without a certified operator, not using proper methods to test the water, and not providing data to Intervenor Missouri Department of Natural Resources (“DNR”) – all contrary to Commission and DNR regulations that are of limited scope with minimal evidence.

WHEREFORE, the Office of the Public Counsel respectfully move the Commission to adopt the procedural schedule proposed above.

Respectfully submitted,

/s/ James M. Owen

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 4th day of October 2016.

/s/ James M. Owen