

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

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

AMENDED STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and pursuant to the July 29, 2022 *Order Suspending Procedural Schedule and Directing Filing of a Monthly Status Report*, states as follows:

1. After the Commission granted Staff's June 3, 2022 *Request for Permission for Entry Upon Land for Inspection*, Respondent I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park, Staff filed a Motion with the Commission for an Order directing Commission's General Counsel to seek enforcement in circuit court allowing Staff access to Respondent's land for inspection. The Commission granted the Staff's Motion on September 14, 2022.

2. On September 22, 2022, Counsel for the Commission filed a *Petition for Order to Permit Entrance Upon Land and Inspection of Property* in the Cole County Circuit Court in accordance with the Commission's September 14, 2022 Order, and Summons was thereafter issued in case number 22AC-CC05836 against Respondent.

3. On September 29, 2022, Respondent was served with the *Petition* in case number 22AC-CC05836. No court date has been set, and no other action has been taken by the circuit court in that case.

4. On October 19, 2022, Staff filed five Data Requests (DRs) upon Respondent. Responses to those DRs are due on or before November 8, 2022.

WHEREFORE, the Staff respectfully offers and requests the Commission accept the foregoing Status Report in this case and grant any further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 25th day of October, 2022, to all counsel of record.

/s/ Carolyn H. Kerr