

**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.)	

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 1-70 Mobile City Park insisted Staff obtain an Order pursuant to § 536.073.2, RSMo, from the circuit court seeking enforcement of the Commission's Order before it would allow and schedule the requested site visit.

2. In response, Staff filed a Motion with the Commission for an Order directing Commission's General Counsel to seek enforcement in circuit court of that Order allowing Staff access to Respondent's land for inspection.

3. Following an informal conference with the Administrative Law Judge pursuant to 20 CSR 4240-2.090(8)(B), and after Respondent filed its *Suggestions in Opposition to Staff's Motion for an Order Directing General Counsel to Seek Enforcement*

of the Commission's Order, the Commission granted the Staff's Motion on September 14, 2022.¹

4. On September 23, 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.

5. Service of that Petition, case number 22AC-CC05836, is currently pending in that case in Cole County Circuit Court.

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 28th day of September, 2022, to all counsel of record.

/s/ Carolyn H. Kerr

¹ The Commission found that the Respondent "refused to comply with the Commission's order directing it to allow entry onto its property to inspect the water and sewer systems," and directed the General Counsel to file an action in "the appropriate circuit court of this state to seek enforcement of the Commission's Order Granting Staff's Motion to Compel and Denying Respondent's Request for a Protective Order."