

**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*, 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, and a November 28, 2022 hearing date was scheduled in the Cole County Circuit Court.

4. On November 23, 2022, Respondent filed a *Motion to Stay*, and Staff filed a *Motion in Limine to Limit the Scope of Proceeding* at the Circuit Court in case number 22AC-CC05836. Respondent's *Motion to Stay*, Staff's *Motion in Limine*, and the *Petition* were all heard and taken under advisement at the November 28, 2022 hearing.

5. To date, no decision has been rendered in case number 22AC-CC05836.

6. On November 23, 2022, Respondent also filed a *Motion for Summary Determination* with the Commission in case number WC-2022-0295. A Response to that *Motion* is due no later than December 23, 2022.

7. On November 18, 2022, Staff filed four Data Requests (DRs) upon Respondent. Responses to those DRs are due on or before December 8, 2022. Supplements to previous DRs have been received in the intervening time period.

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

Missouri Bar Number 45718

Senior Staff Counsel

Attorney for the Staff of the

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-5397 (Voice)

573-526-6969 (Fax)

Carolyn.kerr@psc.mo.gov

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 29th day of November, 2022, to all counsel of record.

/s/ Carolyn H. Kerr