

**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)	

**COMPLAINANT'S REQUEST FOR PERMISSION
FOR ENTRY UPON LAND FOR INSPECTION**

Staff of the Missouri Public Service Commission ("Staff"), through counsel, and pursuant to Missouri Rules of Civil Procedure 58.01(a)(2) and § 393.140(7), RSMo (2016) requests permission to enter upon the business premises operated by Respondent I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park ("I-70 MHP"), located at 1449 Outer Rd., Bates City, Missouri 64011 for the purpose of inspecting, measuring, surveying, photographing, testing, or sampling the property or any designated object or operation thereon, within the scope of Rule 56.01(b):

DEFINITIONS

- (a) The words "you" and "your" refer not only to whom these Requests for Entry Upon Land are addressed, but also include your present and former representatives, officers, employees, directors, shareholders, agents, servants, or investigators, and, unless otherwise privileged, your attorneys.
- (b) The term "person" shall mean the plural as well as the singular and shall include any natural person, and any firm, association, partnership, joint venture, business trust, corporation, governmental or public entity, department, agency, office, or any other form of legal entity.

(c) The term “Complaint” refers to the Complaint filed with the Public Service Commission on April 22, 2022, and any amendments thereto.

(d) “I-70 Mobile City” refers to the mobile home park owned and operated by Respondent I-70 Mobile City, Inc. and may also be referred to as “I-70 MHP.”

INSTRUCTIONS

Staff requests permission to enter upon the business premises operated by Respondent located at 1449 Outer Rd., Bates City, Missouri 64011 beginning at 11:00 a.m. on July 6, 2022.

INSPECTION REQUESTS

1. The I-70 Mobile City Wastewater Treatment Facility and lagoon, as more fully described in the Missouri State Operating Permit issued by the Department of Natural Resources to I-70 MHP and included as Attachment A to the Complaint.

2. Water service connections that are visible.

3. Sewer service connections that are visible.

4. A representative number of water meters located in I-70 Mobile City (approximately 20 percent) plus the master meter to I-70 MHP.

5. System appurtenances that are at or above grade, including access to any structures containing systems-related components.

6. Photographs of the above-listed locations.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar Number 45718

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