

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

In the Matter of the Application of Seges )  
Partners Mobile Home Park for a Certificate )  
of Convenience and Necessity to Provide )  
Water Service. )

Case No. WA-2008-0403

**STAFF’S REQUEST FOR CORRECTION OF SEGES DEFICIENT APPLICATION AND  
NEW DATE FOR STAFF RECOMMENDATION OR STATUS FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”) and in support of its motion states as follows:

1. On June 19, 2008, Seges Partners Mobile Home Park, L.L.C. (“Seges Partners”), filed an application with the Missouri Public Service Commission (“Commission”) requesting a certificate of convenience and necessity to operate a water system.

2. On July 3, 2008, Seges supplemented its application by filing an additional exhibit with ten individuals’ names and addresses that reside within Seges proposed service area served.

3. On July 21, 2008, the Commission issued its Order Directing Filing. This order directed Staff to file either its recommendation or in the alternative a status report stating when it will file such a recommendation no later than August 20, 2008.

4. Pursuant to Commission rule 4 CSR 240-3.600(1)(A) 4. a plat map showing the area to be served must be submitted, and 3.600(1)(A) 5. a feasibility study regarding how the service is proposed to be offered must be submitted with an application for a certificate of convenience and necessity by a water company. If these items “are unavailable at the time of the application is filed, they shall be furnished prior to the granting of the authority sought.” 4 CSR 240-3.600(2).

5. Seges did not and has not submitted either the plat drawing or the feasibility study as Rule 3.600(1)(A) 4. and 5. require.

6. The undersigned has informed Seges counsel of record that the application is deficient. However, no supplemental information has been filed or provided to Staff by Seges as of the date of this filing.

7. Staff respectfully requests the Commission order Seges to correct these deficiencies by a date certain so Staff can process the application and provide a full and fair recommendation of the application request.

8. In addition, Staff requests the filing date of August 20, 2008, for a recommendation or status filing be extended to provide for the date the Commission sets as the deadline for Seges to file its supplemental information and correct the application's deficiencies.

**WHEREFORE**, the Staff respectfully requests the Commission order Seges to correct its application's deficiencies by a date certain. In addition, Staff requests the filing date of August 20, 2008, for a recommendation or status filing be extended to provide for the date the Commission sets as the deadline for Seges to file its supplemental information and correct the application's deficiencies.

Respectfully submitted,

/s/ Shelley Syler Brueggemann  
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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 13<sup>th</sup> day of August 2008.

/s/ Shelley Syler Brueggemann