

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE
OF MISSOURI

Cathy J. Orlor, et al.

Complainants,

v.

Folsom Ridge, LLC. (Owning and
Controlling the BIHOA)

Respondent.

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Case No. WC-2006-0082, et al.₃

FILED

MAR 10 2006

Missouri Public
Service Commission

COMPLAINANT'S RESPONSE TO ANSWERS OF RESPONDENTS
FOLSOM RIDGE, LLC, and BIG ISLAND HOMEOWNERS'
ASSOCIATION

Comes now, Complainant Cathy Orlor and in response to the
Answers of Respondents Folsom Ridge, LLC, and Big Island
Homeowners' Association, states as follows:

1. On March 02, 2006 both Folsom Ridge, LLC, (Owning and Controlling the Big Island Homeowners' Association), and the Big Island Homeowners' Association, (BIHOA), filed identical documents titled "Answer of Respondent," with the exception of the Respondent name being associated with the respective response. The fact that both Respondents filed identical Answers, proves that either: a) Folsom Ridge and the so-called homeowners association are operated as one entity; or b) the owners of Folsom Ridge control the so-called homeowners association.
2. The gist of the Answers to each Complaint by both Respondents is that the Complaints are not sufficiently clear to allow Respondents to answer with any particularity. The Commission explicitly rejected that position in an order issued January 31, 2006, finding "that the complaints sufficiently state the particulars of their allegations and that there is no need for more definite statement." Respondents should not be allowed

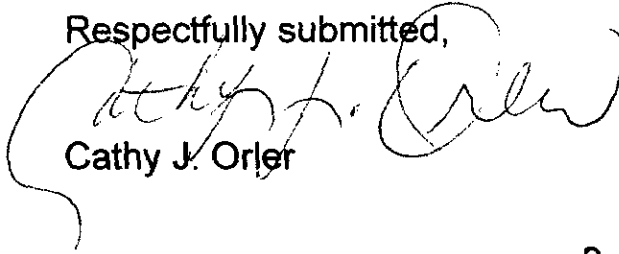
to circumvent the Commission's order directing them to file Answers by relying on an argument that the Commission has already rejected. Respondents also once again move the Commission to dismiss the Complaints. The Commission should once again deny the motions.

It has now been 8 months since the first Formal Complaint against Folsom Ridge, LLC, (Owning and Controlling the BIHOA), was filed with the Public Service Commission of the State of Missouri. With the exception of the Complainants now knowing and understanding the importance of page and paragraph numbering, VERY LITTLE, IF ANYTHING, HAS BEEN ACCOMPLISHED! In the most recent "Answer of Respondent," the Respondents have seemingly ignored previous Commission rulings and orders. To any extent that any complaint makes reference to, and/or alleges violations of the environmental laws or regulations of the United States or the State of Missouri, it is the violation and repeat violations of those laws and regulations by the Respondents, (all of which have been assigned a violation number, and are a matter of documented public record, and provided as support documentation in the complaints), and the alleged violations of laws and regulations, that generated the Formal Complaints currently filed with the PSC against the Respondent(s).

Wherefore, the Complainants request the Commission:

1. Deny the motions to dismiss the Complaints;
2. Allow Complainants to produce documentation as evidence to support their claims stated in the complaints;
3. Make an immediate determination to expeditiously advance this case towards a resolution; and
4. Schedule a date for a formal and public hearing by which each complaint can be heard.

Respectfully submitted,


Cathy J. Orler

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent this 07th day of March, 2006, to the General Counsel's Office, and the Office of Public Counsel, and via U.S. mail, postage prepaid to Mark W. Comley, 601 Monroe Street, Suite 301, P.O. Box 537, Jefferson City, MO. 65102