

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

The Staff of the Missouri Public Service Commission,)	
)	
)	
Complainant,)	
)	<u>Case No. WC-2022-0295</u>
I-70 Mobile City, Inc.)	
d/b/a I-70 Mobile City Park)	
)	
Respondent.)	

**JOINT LIST OF ISSUES, ORDER OF OPENING STATEMENTS,
AND LIST OF WITNESSES**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), and Respondent I-70 Mobile City, Inc., d/b/a I-70 Mobile City Park (“I-70”) by and through counsel, and file the following *Joint List of Issues, Order of Opening Statements, and List of Witnesses* in satisfaction of the Commission’s September 21, 2023 *Order Establishing Procedural Schedule*:

JOINT LIST OF ISSUES

1. Does the Commission have jurisdiction over Respondent I-70 pursuant to §386.250, RSMo?
2. Is I-70 a sewer corporation pursuant to § 386.020(49), RSMo, and operating as a public utility pursuant to § 386.020(43), RSMo?
3. Is I-70 a water corporation pursuant to § 386.020(59), RSMo, and operating as a public utility pursuant to § 386.020(43), RSMo?
4. Is I-70 engaging in the unlawful provision of water services to the public for gain, without certification or other authority from the Missouri Public Service Commission, in violation of § 393.170.2, RSMo?

5. Is I-70 engaging in the unlawful provision of sewer services to the public for gain, without certification or other authority from the Missouri Public Service Commission, in violation of § 393.170.2, RSMo?

6. Should I-70 be ordered to file an application with the Commission requesting certificates of convenience and necessity as a water and sewer corporation and be regulated as a public utility?

7. Is I-70 subject to penalties as provided by § 386.570, RSMo, due to its violations of chapter 393, RSMo?

ORDER OF OPENING STATEMENTS

Staff

I-70

LIST OF WITNESSES

Staff

Andrew Harris
Curt B. Gateley

I-70

Jennifer Hunt

WHEREFORE, the Parties respectfully submit this *Joint List of Issues, Order of Opening Statements, and List of Witnesses* in this case.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar # 45718
Senior Staff Counsel
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

Attorney for Staff of the
Missouri Public Service Commission

ELLINGER BELL LLC

/s/ Stephanie S. Bell

Marc H. Ellinger, #40828
Stephanie S. Bell #61855
308 East High Street, Suite 300
Jefferson City, MO 65101
Telephone: 573-750-4100
Facsimile: 314-334-0450
Email: mellinger@ellingerlaw.com
Email: sbell@ellingerlaw.com

Attorneys for I-70 Mobile City, Inc.
d/b/a I-70 Mobile City Park

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 17th day of November, 2023, to all counsel of record.

/s/ Carolyn H. Kerr