

Stephanie Bell

From: Stephanie Bell
Sent: Wednesday, March 29, 2023 4:25 PM
To: Kerr, Carolyn
Cc: Bretz, Karen; Harris, Andrew; Gateley, Curtis; Bernsen, Debbie
Subject: Re: Request to update DRs - WC-2022-0295

We understand our duty to supplement. To the best of my knowledge, nothing about the business has materially changed since we last responded to each of these.

You sent these requests three days after I informed you my client's fifteen year old daughter was rushed to the hospital and remained unresponsive in the ICU. To this day, she remains hospitalized, and my client remains at her side. I have continued to ask you for extensions and you have continued to refuse.

We prioritized getting you the responses to your other requests which were still outstanding.


To my knowledge, there remain two unanswered DRs, which are not yet due. We are working on those also.


Stephanie



Stephanie Bell
Partner, Ellinger Bell



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From: Kerr, Carolyn <Carolyn.Kerr@psc.mo.gov>
Sent: Wednesday, March 29, 2023 3:59:29 PM
To: Stephanie Bell <sbell@ellingerlaw.com>
Cc: Bretz, Karen <Karen.Bretz@psc.mo.gov>; Harris, Andrew <Andrew.Harris@psc.mo.gov>; Gateley, Curtis <Curtis.Gateley@psc.mo.gov>; Bernsen, Debbie <debbie.bernsen@psc.mo.gov>
Subject: RE: Request to update DRs - WC-2022-0295

Stephanie,

Were you going to update any of these DRs?

Carolyn H. Kerr
Senior Attorney
Missouri Public Service Commission
PO Box 360

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Jefferson City, MO 65102
573-751-5397

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From: Kerr, Carolyn
Sent: Wednesday, March 15, 2023 11:28 AM
To: Stephanie Bell <sbell@ellingerlaw.com>
Cc: Bretz, Karen <Karen.Bretz@psc.mo.gov>; Harris, Andrew <Andrew.Harris@psc.mo.gov>; Gateley, Curtis <Curtis.Gateley@psc.mo.gov>; Bernsen, Debbie <debbie.bernsen@psc.mo.gov>
Subject: Request to update DRs - WC-2022-0295

Stephanie,

As you know, your client has a duty to update the DRs that have been served upon them in the above-referenced case. **Most of the DRs sent by staff were issued in June 2022**, and have not been updated since then. Specifically, please update the following DRs with current information:

- **DR 14** – Please provide copies of all customer bills (for water and sewer service provided to tenants/customers) dated July 1, 2022 to the present.
- **DR 19** – How many tenants/customers currently receive water service in the I-70 MCP?
- **DR 20** – How many tenants/customers currently receive sewer service in the I-70 MCP?
- **DR 21.1** – For each type of rental area/unit, how many currently have sewer hookups and how many have water meters attached to or servicing them?
- **DR 42** – Please provide copies of any water bills received by 1-70 MCP from the Bates City Water Company that are used to calculate tenant bills. (dated 7/1/22 – present)
- **DR 44** – Please provide copies of all lease agreements and/or contracts between I-70 MCP and its tenants/customers currently in effect. Please note that this DR does not ask for sample contracts, but those currently “in effect.”
- **DR 45** – Does I-70 MCP have any employees that work at the I-70 on-site office in Bates City, MO? If so, how many employees work there? Please list them by name, position, and provide contact information (phone and address). Also provide a description of their on-site employee duties. (I am specifically interested in information about Robert Freeman if a response to this DR relates to him.)
- **DR 45.2** – Who is at the I-70 MCP on-site office for tenants to call or visit during business hours? Are they employees, independent contractors, volunteers, or what specifically, is their relationship to I-70 MCP? (I am specifically interested in information about Robert Freeman if a response to this DR relates to him.)
- **DR 47** – Have you had any discussion with Bates City, Missouri since November 2022 about entering into a contract with the City whereby the City will sell to I-70 MCH, and I-70 MCP will pass the charge for that water to

its tenants without any mark up? If so, what was the result of those discussions? Was any agreement reached, or is that option being contemplated by the parties? If an agreement was reached, please provide documentation of that agreement, of if no documentation is available, please provide specific details of the agreement.

Please provide updated responses to the listed DRs no later than Monday, March 27, 2023. Thank you.

Carolyn H. Kerr
Senior Attorney
Missouri Public Service Commission
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Jefferson City, MO 65102
573-751-5397

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