BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

The Staff of the Missouri Public)
Service Commission,)
Complainant,))
v.)
I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park,)))
Respondent.)

Case No. WC-2022-0295 SC-2022-0296

I-70 MOBILE CITY'S AMENDED AVAILABILITY FOR EVIDENTIARY HEARING

COMES NOW Respondent, I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park ("I-70 Mobile City"), by and through counsel, and states as follows regarding its available dates for an evidentiary hearing in the above-captioned matter:

1. On December 5, 2023, the Commission ordered I-70 Mobile City to file available dates for an evidentiary hearing in the above-captioned matter.

2. I-70 Mobile City made such filing on December 14, 2023.

3. As of January 3, 2025, no hearing has been set in this matter.

4. Counsel for Respondent now has an out-of-state conflict on January 24-25, 2024.

5. Respondent also notes the Commission has a hearing scheduled for January 23-25 for case number EC-2024-0015, *Timothy Allegri v. Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West.* 6. Again, I-70 Mobile City respectfully requests that the Commission grant its Motion to Stay and Open a Working Docket filed on December 14, 2023.

7. If the Commission does not stay the case, I-70 Mobile City anticipates two days will be needed for the hearing in this case.

8. Respondent submits the following additional available hearing dates for consideration:

- February 14-16;
- February 28-29;
- March 13-15; or
- March 18-22.

WHEREFORE, I-70 Mobile City files the foregoing available dates for the Commission's information and asks the Commission to grant its Motion to Stay and Open a Working Docket; alternatively I-70 Mobile City respectfully asks the Commission to set an evidentiary hearing in this matter for a two-day hearing on the dates identified in Paragraph 8; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances. Respectfully submitted, ELLINGER BELL LLC

By: <u>/s/ Stephanie S. Bell</u> 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 upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission, on this January 3, 2024.

> <u>/s/ Stephanie S. Bell</u> Stephanie S. Bell