

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

The Manager of the Manufactured Homes)
And Modular Units Program of the Missouri)
Public Service Commission,)
Complainant,)
v.)
Stephen L. Johnson d/b/a Colony Cove, Inc.,)
And/or Sequiota Investments, Inc.,)
Respondent.)

File No. MC-2025-0108

JOINT RESPONSE TO ORDER FOR CASE PROCEDURES

COMES NOW the Staff of the Missouri Public Service Commission (“Staff” of the “PSC” or “Commission”), on behalf of the Manager of the Manufactured Homes and Modular Units Program of the Commission (“Complainant”), and Stephen L. Johnson d/b/a Colony Cove, Inc., and/or Sequiota Investment, Inc., by and through counsel, and submit the following proposed procedures for the evidentiary hearing to be held in this matter:

1. A *Proposed Procedural Schedule* was previously filed on April 23, 2025, and on May 5, 2025, the Commission set the procedural schedule in the above-captioned case.

2. Because no proposed case procedures were filed with the Proposed Procedural Schedule, the Commission ordered the parties to submit case procedures on May 12, 2025.

3. The parties herein file the following case procedures for the hearing in this case, which is currently scheduled to take place on October 28-29, 2025.

Case Procedures

4. Testimony of witnesses will be presented live on the scheduled dates of the hearing, currently October 28 and 29, 2025, rather than filing pre-filed written testimony.
5. Documents filed in EFIS shall be considered properly served by serving the same on counsel of record for all other parties via e-mail.
6. The Parties request expedited transcripts for the evidentiary hearing, with transcripts to be filed in EFIS no later than one week after hearing.

Discovery Procedures

7. The Parties request that the Commission adopt the following procedures regarding discovery:
 - a. All parties shall provide copies of exhibits and pleadings to other counsel of record by electronic means and in electronic form essentially concurrently with the filing of such exhibits or pleadings where the information is available in electronic format. Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchanging it;
 - b. Parties shall make all reasonable efforts to not include confidential information in data requests. If confidential information must be included in data requests, the confidential information will be appropriately designated as such pursuant to 20 CSR 4240-2.135; and

- c. Data requests issued to or by Staff shall be submitted and responded to in the Commission's Electronic Filing and Information System ("EFIS"), if feasible, or in electronic format on compact disc or by other means agreed to by counsel, if infeasible. Counsel for each party shall receive electronically from each other party serving a data request, an electronic copy of the text of the "description" of that data request contemporaneously with service of the data request. Regarding Staff-issued data requests, if the description contains confidential information, or is voluminous, a hyperlink to the EFIS record of that data request shall be considered a sufficient copy. If a party desires the response to a data request that has been served on another party, the party desiring a copy of the response must request a copy of the response from the party answering the data request. Data requests shall be sent by e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list for data requests, but shall assume responsibility for compliance with any restrictions on confidentiality. Data request responses shall be served on counsel for the requesting party, unless waived by counsel, and on the requesting party's employee or representative who submitted the data request, and shall be served electronically, if feasible and not voluminous as defined by Commission rule;

- d. Where data request responses include models or spreadsheets or similar information originally in a commonly available format where inputs or parameters may be changed to observe changes in inputs or outputs, if available in that original format, the party providing the response shall provide this type of information in that original format with formulas intact. Responses shall be provided in electronic format by e-mailing or by delivery of a compact disc or other electronic storage media.

WHEREFORE, on behalf of the Parties, Staff respectfully proposes the following case procedures for the evidentiary hearing in the above-captioned cause.

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

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 29th day of May, 2025, to all counsel of record.

/s/ Carolyn H. Kerr