

Request No. 13: Please provide the name(s), title(s), and contact information of the individual(s) responsible for the responses provided to the Staff data requests. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 14: Please provide a complete explanation of the billing process for water and sewer service provided to tenants/customers at I-70 Mobile City (“I-70 MHP”). Please provide copies of all customer bills dated January 1, 2017, to the present. Deborah Bernsen (Debbie.bernsen@psc.mo.gov)

Request No. 15: How can a customer who has questions regarding their water/sewer service or billing contact an I-70 MHP representative for assistance? Please provide the hours that someone is available and all locations where the customer can find assistance. Deborah Bernsen (Debbie.bernsen@psc.mo.gov)

Request No. 16: Please provide all information that is presently provided to the customer regarding the water/sewer service that they receive at their residence. If it is provided in a lease or brochure, provide a copy of the information. Deborah Bernsen (Debbie.bernsen@psc.mo.gov)

Request No. 17: What happens if a customer does not pay their monthly rent? What actions are taken by I-70 MHP? Would the customer be subject to having their water or other utilities shut-off? Please describe the procedure I-70 MHP uses when a customer continues to pay rent, but fails to pay utility charges, including the steps that lead to eventual service disconnect. How many times in the past five years has the management of the MHP shut-off utility service due to a customer for non-payment? Deborah Bernsen (Debbie.bernsen@psc.mo.gov)

Request No. 18: If appropriate, please provide documentation confirming that I-70 MHP, or the legal entity that provides water/sewer service to its residents, is a properly formed Nonprofit Water and/or Sewer Company pursuant to Sections 393.825-393.861, RSMo, and 393.900-393.954, RSMo. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 19: How many tenants/customers receive water service in the I-70 MHP? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 20: How many tenants/customers receive sewer service in the I-70 MHP? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 21: How many total mobile home lots are located in the I-70 MHP? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 22: Please provide documentation of any agreement with the water supply provider allowing for sub-metering of I-70 MHP tenants’ water bills. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 23: Please describe I-70 MHP’s wastewater system? Does I-70 MHP have a

lagoon, mechanical treatment plant, or is I-70 MHP's wastewater sent to a public water district or municipality treatment facility? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 24: Does I-70 MHP separate utility charges from any rent paid on customer bills? If so, what utilities are separated, specifically? What method does it use to separate the charges?

Request No. 25: How does I-70 MHP use the funds collected from charging its tenants for utility service? Specifically break down how those funds are allocated once received (i.e., operator, maintenance, etc.). Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 26: Who sets the rates or charges for water and/or sewer service? How are the rates and charges determined? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 27: Does I-70 MHP have a list of rates and charges for utility services which detail fixed charges (flat fees), usage charges (based on the amount used), maintenance charges, late fees, etc.? If yes, please provide a list of rates and charges for water and sewer service. Are these rates used to calculate customer bills? If so, how? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 28: Does I-70 MHP have a list of charges for services related to the provision of water and sewer service, such as a fee to shut off and turn on service requested by the customer, late payment fees, etc.? If so, please provide that list(s). Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 29: How long is a standard billing period or cycle for water and sewer? How long after a billing period or cycle are bills received by the customers? How many days after receiving the bills do customers have to pay the bills? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 30: How does I-70 MHP ensure the accuracy of the charge for water and for sewer on each bill? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 31: Does a customer have a way to verify the accuracy of the charge for water and for sewer on the bill? How? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 32: Are customers only charged for the water each customer actually uses? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 33: Does I-70 MHP have meters in place? If yes, are the meters utilized? How old are the meters? Who installed them? Who maintains them? Who assures or checks them for accuracy? How often are they checked for accuracy? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 34: If I-70 MHP has a Permit to Dispense issued by the Missouri Department of Natural Resources, does I-70 MHP have under contract a certified Water Distribution Operator of appropriate level for this system? If so, please provide that person(s) name and contact information. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 35: Do any proceeds from payment of water or sewer bills from residents go to I-70

MHP or its parent company? Please explain. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 36: Does I-70 MHP, or an affiliate, bill customers for water and/or sewer service at any other subdivision or mobile home park location(s) in Missouri? If yes, please provide the location. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 37: How do tenants who rent year-round but do not physically live in the I-70 MHP year-round get billed for their water and sewer service? For example, what if a tenant lives in the I-70 MHP most of the year but “winters” elsewhere for a few months? How do they get billed for water and sewer for the months they are not at their home, but are still paying rent for their lot at the I-70 MHP? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 38: Does I-70 Mobile City, Inc. or its parent company own any other mobile home parks in Missouri? If so, please list the name and address of each one. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 39: Please provide I-70 MHP’s organizational chart showing its employees and/or contractors, including but not limited to, who performs the billing, handles customer calls/complaints, who do these employees and/or contractors directly report to at I-70 MHP or its parent company, who are the system operators, who performs system maintenance, etc. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 40: Please provide an organizational chart detailing I-70 MHP’s parent company(ies) and any affiliates. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 41: Does I-70 MHP bill its customers in advance for water and/or sewer service? If yes, how does I-70 MHP calculate the bill in advance? Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 42: Please provide copies of any water bills received by I-70 MHP from the Public Water District that are used to calculate tenant bills. Please provide copies of all applicable bills received dated January 1, 2017, to the present. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 43: Please explain 1) when I-70 MHP’s responsibility of the water distribution and sewer collection and treatment system began, and 2) the history of any previous responsibility by a Public Water District or municipality. Andrew Harris (Andrew.Harris@psc.mo.gov)

Request No. 44: Please provide copies of all lease agreements and/or contracts between I-70 MHP and its tenants/customers currently in effect. Andrew Harris (Andrew.Harris@psc.mo.gov)