

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

COMMERCE TOWER GROUP, LLC)	
)	
Complainant,)	
)	
v.)	Case No. HC-2016-0056
)	
VEOLIA ENERGY KANSAS CITY, INC.)	
)	
Respondent.)	

**JOINT NOTICE OF SETTLEMENT AND AGREED MOTION TO STAY VEOLIA'S
DEADLINE TO RESPOND TO FIRST FORMAL COMPLAINT**

Complainant Commerce Tower Group, LLC ("CTG") and Respondent Veolia Energy Kansas City, Inc. ("Veolia") provide notice that the parties have agreed in principle to settle the issues raised in CTG's First Amended Complaint ("Complaint"), and also move the Public Service Commission ("Commission") to stay Veolia's deadline in which to answer or otherwise respond to the Complaint. In support of this motion, the parties state as follows:

1. CTG filed its Formal Complaint on September 11, 2015.
2. On September 11, 2015, the Commission issued an Order Giving Notice of Contested Case, Directing Answer, and Directing Staff Investigation (the "Order").
3. Since the inception of this lawsuit, the parties have worked together to resolve the issues raised in the Complaint.
4. In order to facilitate settlement negotiations, the parties have requested extensions of time of certain deadlines in the Order. By Order dated November 3, 2015, the Commission stayed the evidentiary hearing then scheduled for November 6, 2015, and ordered Veolia to respond to the Complaint on or before November 19, 2015.

5. The parties recently agreed, in principle, to resolve the issues in the Complaint. The parties are currently preparing a formal settlement agreement. Because the settlement agreement requires certain actions to occur related to the resolution of this litigation, the parties request that the Commission stay Veolia's deadline to respond to the Complaint.

6. The parties appreciate the Commission's patience and cooperation which allowed the parties to amicably resolve this lawsuit. The parties are optimistic that the Complaint will be dismissed with prejudice shortly without further involvement of the Commission or Staff.

7. This motion is not filed for the purpose of delay or harassment, but rather to allow the parties additional time to finalize their settlement agreement.

8. Staff Counsel has been consulted regarding this request, and Staff Counsel does not oppose this request.

Respectfully submitted,

BRYAN CAVE LLP

By: /s/ James D. Lawrence
James D. Lawrence, #53411
1200 Main Street, Suite 3800
Kansas City, MO 64105-2100
Telephone: (816) 374-3200
Facsimile: (816) 374-3300
jdlawrence@bryancave.com

Carole L. Iles, #33821
Edward F. Downey #28866
221 Bolivar Street, Suite 101
Jefferson City, MO 65101
Telephone: (573) 556-6621
Facsimile: (573) 556-6630
carole.iles@bryancave.com
efdowney@bryancave.com

Diana M. Vuylsteke, #42419
211 N. Broadway, Suite 3600
St. Louis, Missouri 63102
Telephone: (314) 259-2569

Facsimile: (314) 259-2020
diana.vuylsteke@bryancave.com

ATTORNEYS FOR VEOLIA ENERGY
KANSAS CITY, INC.

LATHROP & GAGE LLP

By: /s/ Matthew L. Faul
Matthew L. Faul , #57397
James W. Grice, #41644
2345 Grand Blvd., Suite 2400
Kansas City, MO 64108
Telephone: (816) 292-2000
Facsimile: (816) 292-2001
mfaul@lathropgage.com
jgrice@lathropgage.com

Jennifer S. Griffin, #44406
314 E. High Street
Jefferson City, MO 65101
Telephone: (573) 761-5006
Facsimile: (573) 893-5398
jgriffin@lathropgage.com

ATTORNEYS FOR COMPLAINANT
COMMERCE TOWER GROUP LLC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 17th day of November 2015, to all parties on the Commission's Service list in this case.

/s/ James D. Lawrence