

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

In the matter of the Application of	)	
Ozark Shores Water Company, North	)	
Suburban Public Utility Company	)	
and Camden County Public Water	)	
Supply District Number Four for	)	
an order authorizing the Sale,	)	File No.WM-2015-0231
Transfer and Assignment of Water	)	
Assets to Camden County Public Water	)	
Supply District Number Four and in	)	
connection therewith certain other	)	
related transactions.	)	

**JOINT APPLICANTS' MOTION TO LIFT STAY FOR PURPOSES  
OF RECEIVING WRITTEN TESTIMONY**

Come now Ozark Shores Water Company ("Ozark Shores" or "Company"), North Suburban Public Utility Company ("North Suburban") and Camden County Public Water Supply District Number Four (the "District") (sometimes collectively referred to as "Applicants") and submit the following to the Commission:

1. On May 20, 2015, the Attorney General filed an *Application to Intervene Out of Time* and in support of the application asserted an interest in preventing office holders from unlawfully executing their office and insuring that public debt was not utilized to purchase property at artificially inflated values or was staged for a default. The Commission ruled in favor of the Attorney General and on June 2, 2015 granted the application and further stayed the proceedings subject however to status review and reports by any party on or before July 2, 2015.

2. Representatives of the Joint Applicants conferred with the office of Attorney General in advance of the Commission's June 2, 2015 order with the objective of resolving the serious questions about the relationship existing between them and the effect of that relationship on the transaction before the Commission.

3. Joint Applicants were asked by the Attorney General to provide affidavits of identified officers and employees, and Joint Applicants have determined that they should also be brought to the attention of the Commission staff and filed with the Commission.

4. Joint Applicants move to lift the stay imposed in the June 2, 2015 order to submit the written testimony, which the Commission will find under this cover, of the following witnesses:

- a. John R. Summers
- b. Melissa Martinette-Hills
- c. Dr. Ronald Massie
- d. Terry Randall Thompson
- e. Roger Sallee
- f. Harrell Dryden

5. Joint Applicants submit that the testimony provided will prove without further argument that the processes by which the District approved the agreement to purchase Ozark Shores assets are above criticism and reproach, and in turn will clear the way for the Commission to approve this transaction with due speed.

WHEREFORE, Joint Applicants respectfully request the Commission to lift the stay of proceedings for purposes of accepting for filing the testimonies of the witnesses identified above.

Respectfully submitted,

/s/ Mark W. Comley

Mark W. Comley #28847  
Newman, Comley & Ruth P.C.  
601 Monroe Street, Suite 301  
P.O. Box 537  
Jefferson City, MO 65102  
(573) 634-2266  
(573) 636-3306 FAX

ATTORNEYS FOR OZARK SHORES WATER COMPANY  
AND NORTH SUBURBAN PUBLIC UTILITY COMPANY

**/s/ Robert W. Pohl**

Robert W. Pohl  
Pohl & Pohl, P.C.  
2806 Horseshoe Bend Parkway  
Suite 100  
Lake , MO 65049  
573-365-3350  
Fax: 573-365-3358  
ATTORNEYS FOR THE DISTRICT

TOGETHER, THE JOINT APPLICANTS

**Certificate of Service**

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 4<sup>th</sup> day of June, 2015, to Cydney D. Mayfield at [cydney.mayfield@psc.mo.gov](mailto:cydney.mayfield@psc.mo.gov); General Counsel's Office at [staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov); and Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov) and Brian T. Bear at [Brian.Bear@ago.mo.gov](mailto:Brian.Bear@ago.mo.gov).

**/s/ Mark W. Comley**