

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

The Staff of the Missouri Public Service Commission,  
  
Complainant,  
  
v.  
  
Missouri Utilities Company and Gary Cover,  
  
Respondents.

**File No. WC-2017-0095**

**STAFF MOTION TO STAY ALL MISSOURI UTILITIES COMPANY CASES  
UNTIL THE TRANSFER TO ELM HILLS UTILITY OPERATING COMPANY, INC.  
IS COMPLETE**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Stay all Missouri Utilities Company Cases Until the Transfer to Elm Hills Utility Operating Company, Inc. is Complete* respectfully states as follows:

1. On September 30, 2016, Staff filed complaints in cases WC-2017-0095 and SC-2017-0096 against Missouri Utilities Company (“Missouri Utilities” or “Company”) and its court appointed receiver, Gary Cover, alleging that the Company failed to pay its 2014 assessment to the Commission.

2. On October 10, 2016, Respondents filed a timely answer.

3. On November 4, 2016, the Commission filed its *Order Scheduling a Procedural Conference*.

4. On November 21, 2016, the procedural conference was held, at which the judge ordered a procedural schedule to be filed by December 1, 2016.

5. Also on November 21, 2016, the Commission issued an *Order Consolidating Cases*, in which it consolidated file number SC-2017-0096 into file number WC-2017-0095.

6. On November 29, 2016, Missouri Utilities Company (“Missouri Utilities” or “Company”) filed in cases WC-2017-0007 and SC-2017-0008 a *Motion to Stay all Missouri Utilities Company Cases Until the Transfer to Elm Hills Utility Operating Company, Inc. is Complete*. In its motion, the Company requested that the Commission stay all proceedings against and involving Missouri Utilities. The motion was not filed in all proceedings against and involving Missouri Utilities, nor did it list the proceedings by case number.

7. Staff does not object to the Company's request for a stay of these proceedings until the transfer to Elm Hills is complete. Staff further requests that the above-captioned case be stayed until the transfer to Elm Hills is complete.

**WHEREFORE**, Staff respectfully requests that the Commission grant a stay in case WC-2017-0095, and for such other and further relief as the Commission deems appropriate.

Respectfully submitted,

**/s/ Marcella L Forck**

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**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were mailed, electronically mailed, or hand-delivered to all counsel of record this 1<sup>st</sup> day of December, 2016.

**/s/ Marcella L. Forck**