

**BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION**

Staff of the Public Service Commission)	
)	
Complainant,)	
)	
v.)	Case No. WC-2008-0079
)	
Universal Utilities, Inc. and Nancy Carol)	
Croasdell)	

ANSWER OF UNIVERSAL UTILITIES, INC. AND NANCY CAROL CROASDELL

COMES NOW Universal Utilities, Inc. and Nancy Carol Croasdell ("Universal"), respondent in the above-captioned proceeding, and submits its answer to Staff's Complaint as ordered by the Missouri Public Service Commission ("Commission") on September 14, 2007.

1. Universal denies the allegation in Paragraph 1 of the Complaint.
2. Universal admits that the language quoted in Paragraph 2 appears in Section 386.390.1 RSMo 2000.
3. Universal admits in part and denies in part the allegations set forth in Paragraph 3 of the Complaint. Universal admits that it is a Michigan domestic profit corporation in good standing, incorporated on December 28, 1995. Its correct mailing address is P.O. Box 190539, Burton, Michigan 48519-0539.
4. Universal admits in part and denies in part the allegations set forth in Paragraph 4 of the Complaint. Universal's registered agent in Missouri is Registered Agent, Ltd., 2345 Grand Boulevard, Suite 2400, Kansas City, Missouri 64108.

5. Universal is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 5 of the Complaint and therefore denies the same.

6. Universal is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 6 of the Complaint and therefore denies the same.

7. Universal is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 7 of the Complaint and therefore denies the same.

8. Universal denies the allegations set forth in Paragraph 8 of the Complaint.

9. Universal denies the allegations set forth in Paragraph 9 of the Complaint.

10. Universal denies the allegations set forth in Paragraph 10 of the Complaint.

11. Universal denies the allegations set forth in Paragraph 11 of the Complaint.

12. Universal denies that it sells water at Blue Acres Mobile Home Park.

13. Universal denies the allegations set forth in Paragraph 13 of the Complaint.

14. Universal is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 14 of the Complaint and therefore denies the same..

15. Universal is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 15 of the Complaint and therefore denies the same.

16. Universal is without knowledge or information sufficient to form a belief as to the truth of the first allegation set forth in Paragraph 16 of the Complaint. Universal denies that it is operating in Missouri ultra vires and without lawful authority.

17. Paragraph 17 of the Complaint does not require a response.

18. Universal admits that the language quoted in Paragraph 18 of the Complaint appears in Section 386.020(58) RSMo.

19. Universal admits that the language quoted in Paragraph 19 of the Complaint appears in Section 386.020(48) RSMo.

20. Universal denies the allegations set forth in Paragraph 20 of the Complaint.

21. Universal denies the allegations set forth in Paragraph 21 of the Complaint.

22. Universal denies all of the allegations set forth in Paragraph 22 of the Complaint, with the exception of a portion of Paragraph 22b. Universal admits that it reads water meters at Blue Acres Mobile Home Park.

23. Universal denies the allegations set forth in Paragraph 23 of the Complaint. Universal no longer utilizes the attached notice marked as "Exhibit C."

24. Universal denies the allegations set forth in Paragraph 24 of the Complaint.

25. Universal denies the allegations set forth in Paragraph 25 of the Complaint.

26. Universal denies the allegations set forth in Paragraph 26 of the Complaint.

27. Universal denies the allegations set forth in Paragraph 27 of the Complaint.

28. Universal admits that the language quoted in Paragraph 28 of the Complaint appears in Section 386.020(42) RSMo.

29. Universal denies the allegations set forth in Paragraph 29 of the Complaint.

30. Paragraph 30 of the Complaint does not require a response.

31. Universal admits that the language quoted in Paragraph 31 of the Complaint appears in Section 393.170 RSMo.

32. Universal admits the allegations set forth in Paragraph 32 of the Complaint.

33. Universal denies the allegations set forth in Paragraph 33 of the Complaint.

34. Paragraph 34 of the Complaint does not require a response.

35. Universal admits that the language quoted in Paragraph 35 of the Complaint appears in Section 386.570 RSMo.

36. Universal admits that the language quoted in Paragraph 36 of the Complaint appears in Section 386.600 RSMo.

WHEREFORE, having fully answered, Universal respectfully requests that the Commission dismiss Staff's Complaint and for such other further relief as the Commission deems necessary and just in the circumstances.

Respectfully submitted,

LATHROP & GAGE, L.C.

/s/ Paul S. DeFord

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***Attorneys for Universal Utilities, Inc. and
Nancy Carol Croasdell***

Dated: October 15, 2007

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Universal Utilities, Inc. and Nancy Carol Croasdell has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 15 day of October, 2007, to:

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/s/ Paul S. DeFord

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