

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Joint Application of)
Green Acres Mobile Home Park LLC (GA))
and Desperado Series Three LLC and MAM)
Investments Three LLC (DM), Joint) Docket No. 17-STMW-040-ACQ
Applicants, for an Order Approving the)
Transfer to DM of GA's Certificates/Licenses)
for the Operation of a Public Water Utility)
and for Other Related Relief.)

MOTION TO STAY PROCEEDINGS

COMES NOW, Green Acres Mobile Home Park LLC, Desperado Series Three LLC and MAM Investments Three LLC (referred hereafter as "Joint Applicants") and files its Motion to Stay Proceedings. In support of its Motion, the Joint Applicants state the following:

I. BACKGROUND

1. On July 21, 2016, the Joint Applicants filed an Application requesting, among other things, Commission approval of a transfer of public utility rights and obligations currently held by Green Acres Mobile Home Park, LLC to Desperado Series Three LLC and MAM Investments Three LLC.¹

II. STAY OF PROCEEDINGS

2. Pursuant to K.S.A. 66-131(c), the Commission is required to issue an order on the Joint Applicants' Application within 300 days from the date of the Application's filing. K.S.A. 66-131(c) also permits the Commission and Joint Applicants to agree to a waiver or extension of the 300-day period.

3. The Joint Applicants respectfully request the statutory time period for a decision on its Application be waived.

¹ See Joint Application, pp. 5-6 (Jul. 21, 2016) (Joint Application).

4. Informal discussions between the Joint Applicants and Commission Staff (Staff) have reinforced the Joint Applicants desire to *not* become a public utility. The Joint Applicants applied for a transfer of the necessary certificates and licenses only because the Joint Applicants purchased Green Acres Mobile Home Park.

5. Parties to this proceeding are currently investigating the possibility and feasibility of transferring ownership and management of the public utility assets currently managed by Green Acres Mobile Home Park, LLC to a neighboring water district or other alternative capable entity.

6. It is likely the possibility of sale or transfer of assets to an alternative entity will take significant time. To prevent the Commission's statutory review period from running while parties investigate this possible course of action, the Joint Applicants respectfully request the docket be stayed and any statutory timelines be tolled until the parties have further explored the sale of Green Acres Mobile Home Park, LLC's, public utility operations to a separate entity.

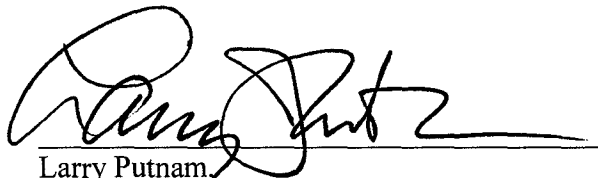
7. Upon determining whether such a sale or transfer is possible, the Joint Applicants will file a motion in this docket requesting to lift the stay and proceed with this docket as required. Any statutory period would begin to resume upon issuance of a Commission order indicating such.

8. The Joint Applicants request any stay issued in this docket be effective from the date of the filing of this Motion.

9. The Joint Applicants have discussed this proposed course of action with Staff, and Staff has informed the Joint Applicants it is not opposed to the Joint Applicants' proposal.

WHEREFORE, the Joint Applicants respectfully request the Commission issue an Order Staying Proceedings and for any other relief the Commission may deem just and reasonable.

Respectfully submitted,



Larry Putnam,
Attorney for Green Acres Mobile Home Park LLC

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