BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

The Manager of the Manufactured Homes and Modular Units Program of the Missouri Public Service Commission,

Complainant,

v.

Case No. MC-2020-0135

Charles W. Brune and Anna G. Brune d/b/a Brune Mobile Sales,

Respondents

EXPEDITED REQUEST FOR PREHEARING CONFERENCE

COME NOW The Manager of the Manufactured Housing and Modular Units Program ("Manager"), through counsel, and requests an expedited prehearing conference at the Commission's earliest convenience to determine how to receive live testimony from two or three witnesses did not submit prefiled testimony.

This Complaint stems from an investigatory docket (MO-2019-0258) involving Respondents' failure to use licensed installers and arrange the proper setup of five manufactured homes, in violation of § 700.100.3(6), RSMo and 20 CSR 4240-120.065. Respondents purportedly obtained five waivers of installation service to install these manufactured homes, but nevertheless Respondents hired unlicensed contractors to install them.¹

Mr. Brune's testimony is that "[e]ach homeowner wanted to be responsible for setting up their own home" and that "[e]ach step of installation was either performed by

¹ Staff of the Missouri Public Service Commission, *Direct Testimony of Justin Smith*, MC-2020-0135, 2 (Apr 3, 2020).

the homeowners themselves or under their direction and supervision."² The Manager wants to present live testimony by two or three homeowners to rebut Mr. Brune's testimony that they wanted to be responsible for setting up their homes and that they supervised the installations. This testimony was not developed until after the due date for rebuttal testimony. For this reason, the Manager requests an expedited prehearing conference to determine how this testimony may be received.

Respectfully submitted,

<u>/s/ Karen E. Bretz</u>

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 7th day of May, 2020.

<u>/s/ Karen E. Bretz</u>

² Charles W. Brune and Anna G. Brune d/b/a Brune Mobile Sales, *Rebuttal Testimony of Charles Brune,* MC-2020-0135, 2-3 (Apr 17, 2020).