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July 24, 2000

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Director, Research and Public Affairs

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Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. MX-2000-431

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION TO CONSOLIDATE**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

David J. Stueven
Assistant General Counsel
(573) 751-6726
(573) 751-9285 (Fax)

DJS/lb
Enclosure
cc: Counsel of Record

FILED²
JUL 24 2000

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JUL 24 2000

Missouri Public
Service Commission

In the Matter of a Proposed Amendment)
to Rule 4 CSR 240-121.060 - Complaints)
and Review of Director Action)

Case No. MX-2000-431

MOTION TO CONSOLIDATE

COMES NOW the Director of the Department of Manufactured Homes and Modular Units of the Missouri Public Service Commission ("Director" and "Department"), by and through the Missouri Public Service Commission's Office of General Counsel, and for his Motion to Consolidate ("Motion") states as follows:

1. Case Nos. MX-2000-430, MX-2000-431, MX-2000-433, and MX-2000-445 all deal with changes to 240 CSR Chapter 121 that recognize the removal of recreational vehicles from the Commission's jurisdiction (See Senate Bill 19) or update terminology to reflect current industry practice. None of the proposed rulemakings have a fiscal impact on the State or any subdivision thereof or on any other public or private entity.

2. For administrative ease, these cases could be consolidated into one. This would facilitate the processing of these proposed rulemakings and speed their implementation if the proposed rulemakings are approved by the Commission.

WHEREFORE, the Director respectfully requests that the Commission consolidate Case Nos. MX-2000-430, MX-2000-431, MX-2000-433, and MX-2000-445.

Respectfully submitted,

DANA K. JOYCE
General Counsel



David J. Stueven
Assistant General Counsel
Missouri Bar No. 51274

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 24th Day of July 2000.



Service List for
Case No. MX-2000-431
July 24, 2000

Office of the Public Counsel
P.O. Box 7800
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