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January 20, 2000

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Public Service Commission
Truman State Office Building
Jefferson City, MO 65102

FILED

JAN 20 2000

Missouri Public
Service Commission

RE: *In the matter of Joint Application of UtiliCorp United, Inc. and
Empire District Electric Company, No. EM-2000-369*

Dear Sir/Madam:

Enclosed for filing please find an original and 15 copies of Motion to Consolidate.
Please stamp "filed" on the extra copy for my records. Thank you.

Sincerely,

JEREMIAH W. (JAY) NIXON
Attorney General

Shelley A. Woods/pah
SHELLEY A. WOODS
Assistant Attorney General

SAW:pah
Enclosure

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

● **FILED**

JAN 20 2000

In the Matter of the Joint Application of UtiliCorp
United Inc. and Empire District Electric
Company for Authority to Merge
Empire District Electric Company with UtiliCorp
United Inc. and, in Connection Therewith, Certain
Other Related Transactions

) Missouri Public
) Service Commission
)
) Case No. EM-2000-
) 369
)
)


MOTION TO CONSOLIDATE

COME NOW Missouri Department of Natural Resources (MDNR) and pursuant to Rule 66.01, Supreme Court Rules of Civil Procedure, and for its Motion to Consolidate Case NO. EM-2000-292 and Case No. EM-2000-369, states that it joins in the Motion to Consolidate filed with this Commission by the Office of Public Counsel and further requests that the Procedural Schedule be revised and that it be sufficiently extended to enable the parties to respond to the filings offered by all the Applicants. Unless staff, the Office of Public Counsel and the Intervenors have the time to conduct a thorough review and offer a complete response, the citizens of this state will not be adequately served by this process.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that the Commission grant the Motion to Consolidate the two merger application cases.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON


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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, by United States mail, this 20TH day of January, 2000, to:

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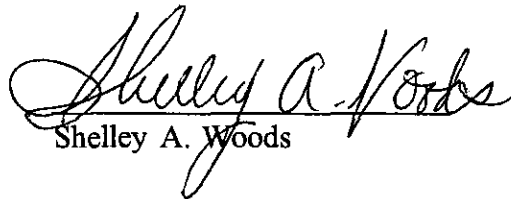
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