



*Commissioners*

**SHEILA LUMPE**  
Chair

**M. DIANNE DRAINER**  
Vice Chair

**CONNIE MURRAY**

**ROBERT G. SCHEMENAUER**

**KELVIN L. SIMMONS**

**Missouri Public Service Commission**

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
573-751-3234  
573-751-1847 (Fax Number)  
<http://www.psc.state.mo.us>

July 24, 2000

**BRIAN D. KINKADE**  
Executive Director

**GORDON L. PERSINGER**  
Director, Research and Public Affairs

**WESS A. HENDERSON**  
Director, Utility Operations

**ROBERT SCHALLENBERG**  
Director, Utility Services

**DONNA M. KOLLIS**  
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-2000-433**

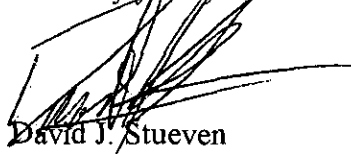
Dear Mr. Roberts:

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

FILED<sup>2</sup>

JUL 24 2000

Missouri Public  
Service Commission

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of a Proposed Amendment     )  
to Rule 4 CSR 240-121.010 - Definitions     )

Case No. MX-2000-433

**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

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-6726 (Telephone)  
(573) 751-9285 (Fax)

### **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 24<sup>th</sup> Day of July 2000.



**Service List for**  
**Case No. MX-2000-433**  
**July 24, 2000**

Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102