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Missouri Public Service Commission

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August 27, 2001

WESS A. HENDERSON 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

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Missouri Public Service Commission

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

RE: Case No. MC-2000-660

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **DIRECTOR'S MEMORANDUM IN SUPPORT OF THE STIPULATION AND AGREEMENT.**

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,

Bruce H. Bates

Associate General Counsel

(573) 751-7434

(573) 751-9285 (Fax)

BHB/lb Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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Director of the Division of Manufactured Homes, Recreational Vehicles and Modular Units of the Public Service Commission,	Missouri Public)))))
Complainant,	Case No. MC-2000-660
VS.	
Discount Manufactured Housing, Inc.,)
Respondent.	<i>)</i>)

DIRECTOR'S MEMORANDUM IN SUPPORT OF THE STIPULATION AND AGREEMENT

COMES NOW the Director of the Division of Manufactured Homes, Recreational Vehicles and Modular Units of the Public Service Commission ("Director" and "Commission") and for his Memorandum in Support of the Stipulation and Agreement states:

- 1. On August 13, 2001, the Director and Discount Manufactured Housing, Inc. ("Discount") filed a *Stipulation and Agreement* settling the outstanding issues existing between them in this case. In Paragraph 8 of that document, the Director and Discount stated that "[t]he Director shall have the right to submit to the Commission a Memorandum explaining his rationale for entering into this Stipulation [and] Agreement".
- 2. The rationale for the Director's participation in the *Stipulation and Agreement* is already set out in its entirety in that document. Therefore, as there is no further dispute between

the Director and Discount, the Director requests that the Commission approve the terms of the *Stipulation and Agreement* as set forth in the document, for the reasons set forth therein.

3. The Office of the Public Counsel does not object to the terms of the Stipulation and Agreement.

WHEREFORE the Director prays that the Commission approve the Stipulation and Agreement in this matter.

Respectfully submitted,

DANA K. JOYCE General Counsel

Bruce H. Bates

Associate General Counsel Missouri Bar No. 35442

Attorney for the Director of the Division of Manufactured Homes, Recreational Vehicles and Modular Units of the Public Service Commission

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel or parties of record as shown on the attached service list this 27th day of August 2001.

Bruce H. Bates

Service List for Case No. MC-2000-660 Verified: July 18, 2001 (lb)

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

Larry J. Meyer, President C/0 Discount Manufactured Housing, Inc. 1601 North Outer Road East 50 Highway Warrensburg, MO 64093 Daniel R. Carter Fitzgerald, Fitzgerald & Carter 219 North Holden St. Warrensburg, MO 64093

Jim Levin, Director and Law Student Center for Dispute Resolution University of Missouri School of Law 206 Hulston Hall Columbia, MO 65211