

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

In the Matter of the Applications to	)	
Withdraw and Have Cancelled All	)	
Certificates of Service Authority of:	)	
	)	
Laclede Technologies, L.L.C.	)	Case No.'s XD-2005-0439
	)	
Se-Ma-No Technologies, L.L.C.	)	XD-2005-0440
	)	
Webster Technologies, L.L.C.	)	XD-2005-0442
	)	
Crawford Technologies, L.L.C.	)	XD-2005-0443
	)	
Howell-Oregon Technologies, L.L.C.	)	XD-2005-0444
	)	
Gascosage Technologies, L.L.C.	)	XD-2005-0475
	)	
White River Technologies, L.L.C.	)	XD-2005-0476
	)	
Southwest Fiber Communications, L.L.C.	)	XD-2005-0477

**STAFF RESPONSE IN SUPPORT OF MOTION TO CONSOLIDATE**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its response in support of Applicants' motion to consolidate cases, states as follows:

On June 17, 2005, Applicants filed a Motion To Consolidate the eight certificate cancellation cases listed above. Commission rule 4 CSR 240-2.110(3) permits the Commission to consolidate pending actions involving "related questions of law or fact". Staff believes the consolidation of these cases meets this standard. The common question of fact is what service do these companies provide. The common question of law is whether that service falls under the Commission's jurisdiction.

WHEREFORE, the Staff supports the consolidation of the above-listed Application cases. Staff takes no position on which case should be the lead case.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

**/s/ Robert S. Berlin**

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 20th day of June 2005.

**/s/ Robert S. Berlin**