

Commissioners KELVIN L. SIMMONS Chair

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SHEILA LUMPE CONNIE MURRAY

STEVE GAW

# 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 23, 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

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 STATEMENT OF POSITION.

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

FILED<sup>2</sup>

Service Commission

(573) 751-7434

(573) 751-9285 (Fax)

BHB/lb Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

OF THE ST	FI F 2
Director of the Division of Manufactured Homes, Recreational Vehicles and Modular Units of the Public Service Commission,	JUL 2 3 2001 ) Service Commission
Complainant, v.	) Case No. MC-2000-660
Discount Manufactured Housing, Inc.,	) ) )
Respondent.	)

## **DIRECTOR'S STATEMENT OF POSITION**

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 *Statement of Position* in this case states as follows:

1. On May 15, 2001, the Commission issued its *Order Establishing Procedural Schedule* in this case. In that order, the Commission directed the parties to file a statement of position on the issue raised in this case no later than July 24, 2001. The Director hereby states the following:

#### LIST OF ISSUES

The Missouri Public Service Commission has jurisdiction over the setup of manufactured homes within the state. Discount Manufactured Housing, Inc. was responsible for the setup of the manufactured home of Mr. William Tague. Was Mr. Tague's manufactured home properly setup by Discount?

## STATEMENT OF POSITION

Mr. Tague's manufactured home was not properly setup by Discount.

WHEREFORE, the Director prays that the Commission accept his *Statement of Position* in this case. The Director further prays that the Commission make whatever other order and judgments it deems just and proper in this cause.

Respectfully submitted,

DANA K. JOYCE General Counsel

Bruce H. Bates

Associate General Counsel Missouri Bar No. 35442

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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 23rd day of July, 2001.

Service List for Case No. MC-2000-660 Verified: July 23, 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