

ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

ATTORNEYS AT LAW

700 EAST CAPITOL AVENUE

COL. DARWIN MARMADUKE HOUSE

P.O. BOX 1438

JEFFERSON CITY, MISSOURI 65102-1438

TELEPHONE 573-634-3422

FAX 573-634-7822

EUGENE E. ANDERECK

TERRY M. EVANS

ERWIN L. MILNE

JACK PEACE

CRAIG S. JOHNSON

RODRIC A. WIDGER

GEORGE M. JOHNSON

BEVERLY J. FIGG

WILLIAM S. LEWIS

VICTOR S. SCOTT

COREY K. HERRON

MATTHEW M. KROHN

LANETTE R. GOOCH

SHAWN BATTAGLER

ROB TROWBRIDGE

JOSEPH M. PAGE

LISA C. CHASE

JUDITH E. KOEHLER

ANDREW J. SPORLEDER

June 17, 2005

FILED

JUN 17 2005

OF COUNSEL

MARVIN J. SHARP

PATRICK A. BAUMHOER

GREGORY C. STOCKARD (1904-1993)

PHIL HAUCK (1924-1991)

Secretary/Chief Administrative Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Missouri Public
Service Commission

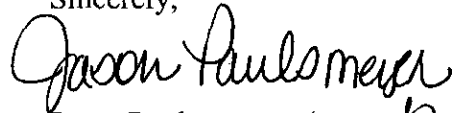
Re: In the Matter of the Application of Laclede Technologies, LLC to withdraw and have cancelled all Certificates of Service Authority. Case No. XD-2005-0439.

Dear Secretary:

Enclosed for filing please find an original and eight (8) copies of the Motion to Consolidate.

Thank you for seeing this filed.

Sincerely,


Jason Paulsmeyer *by: [Signature]*

CSJ:sjo

Enclosure

CC: PSC General Counsel
OPC General Counsel

TRENTON OFFICE
9th AND WASHINGTON
P.O. BOX 547
TRENTON, MISSOURI 64683-0547
660-359-2244
FAX 660-359-2116

SPRINGFIELD OFFICE
1111 S. GLENSTONE
P.O. BOX 4929
SPRINGFIELD, MISSOURI 65808-4929
417-864-6401
FAX 417-864-4967

PRINCETON OFFICE
207 NORTH WASHINGTON
PRINCETON, MISSOURI 64673
660-748-2244
FAX 660-748-4405

SMITHVILLE OFFICE
119 E. MAIN STREET
P.O. BOX 654
SMITHVILLE, MISSOURI 64089
816-532-3895
FAX 816-532-3899

FILED

JUN 17 2005

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Application of)
Laclede Technologies, LLC to withdraw)
and have cancelled all Certificates)
of Service Authority.)

Case No. XD-2005-0439

MOTION TO CONSOLIDATE

Comes now Petitioner and hereby moves the Commission to consolidate the following Applications for Withdrawal of Certificates of Service Authority with the Lead Case to be XD-2005-440 (*In the Matter of the Application of Se-Ma-No Technologies, L.L.C. to withdraw and have cancelled all Certificates of Service Authority*):

- XD-2005-0439 Laclede Technologies, L.L.C.
- XD-2005-0440 Se-Ma-No Technologies, L.L.C.
- XD-2005-0442 Webster Technologies, L.L.C.
- XA-2005-0443 Crawford Technologies, L.L.C.
- XD-2005-0444 Howell-Oregon Technologies, L.L.C.
- XD-2005-0475 Gascoage Technologies, L.L.C.
- XD-2005-0476 White River Technologies, L.L.C.
- XD-2005-0477 Southwest Fiber Communications, L.L.C.

In Support of this Motion, Petitioner states as follows:

1. The above named eight companies are all subsidiaries of rural electric cooperatives that provide unlit fiber telecommunications facilities to Sho-Me Technology, L.L.C. who, in turn provides service to end-users.

2. Said Companies simultaneously filed their applications for withdraw of certificates of service authority as listed above with the Commission with the belief that it is not necessary for said companies to be certificated as they do not provided services to public consumers.

3. The circumstances, facts, and issues potentially in dispute for each Company and their respective applications are identical.

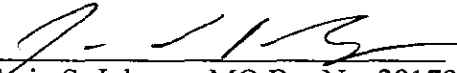
4. Said Companies are represented by the same counsel, Craig S. Johnson of Andereck, Evans, Milne, Peace, & Johnson, L.L.C. regarding these applications and have conducted negotiations with Commission staff regarding these applications as a group through said Counsel.

5. Consolidating these eight applications will allow the Companies and the Commission the efficiencies and savings in time, expense, and other resources associated with a single proceeding to determine the issues herein.

6. Consolidating these eight applications will allow the Commission to appoint one Regulatory Law Judge and avoid the administrative difficulty of conducting eight separate proceedings. It will also avoid or minimize the risk of decisions if these eight applications were conducted as separate proceedings. It will also simplify the Commission's calendar by having a single procedural schedule instead of eight separate schedules.

WHEREFORE, on the basis of the foregoing, Petitioner requests that the above eight application proceedings be consolidated into a single proceeding.

ANDERECK, EVANS, MILNE, PEACE
& JOHNSON, L.L.C.

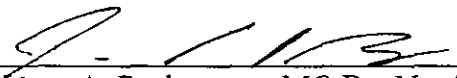
By 
Craig S. Johnson MO Bar No. 28179
Jason A. Paulsmeyer, MO Bar No. 52899
The Col. Darwin Marmaduke House
700 East Capitol
P.O. Box 1438
Jefferson City, MO 65102-1438
Telephone: (573) 634-3422
Fax: (573) 634-7822
ATTORNEYS FOR PETITIONER

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was hand delivered or mailed, via U.S. Mail, postage prepaid, this 17th day of June, 2005, to the following representatives of Staff and OPC:

Bob Berlin
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

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


Jason A. Paulsmeyer, MO Bar No. 52899