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June 17, 2005

FILED

JUN 17 2005

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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 White River Technologies, LLC to
withdraw and have cancelled all Certificates of Service Authority.
Case No. XD-2005-0476.**

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



CSJ:sjo

Enclosure

CC: PSC General Counsel
OPC General Counsel

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JUN 17 2005

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

Missouri Public
Service Commission

Case No. XD-2005-0476

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 | Gascosage 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.

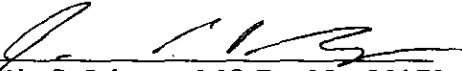
4. Said Companies are represented by the same counsel, Craig S. Johnson of Andereck, Evans, Milne, Peace, & Johnson, L.L.C. regarding these applications and have conducted negotiations with Commission staff regarding these applications as a group through said Counsel.

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 
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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