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April 19, 2001

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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. GR-2001-250/GR-2001-495

FILED²
APR 19 2001
Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION TO CONSOLIDATE**.

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,

Robert V. Franson
Assistant General Counsel
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(573) 751-9285 (Fax)
rfranson@mail.state.mo.us

RVF:ccl
Enclosure
cc: Counsel of Record

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

FILED³

APR 19 2001

Missouri Public
Service Commission

In the matter of Fidelity Natural Gas, Inc.'s)
Purchased Gas Adjustment Factors to be)
Audited in Its 1999-2000 Actual Cost) (Case No. GR-2001-250
Adjustment)

In the matter of Fidelity Natural Gas, Inc.'s)
Purchased Gas Adjustment Factors to be)
Audited in Its 2000-2001 Actual Cost) Case No. GR-2001-495
Adjustment)

MOTION TO CONSOLIDATE

COMES NOW Fidelity Natural Gas, Inc.'s ("Company"), Staff of the Missouri Public Service Commission ("Staff") and the Office of the Public Counsel ("Counsel") and respectfully submit as follows:

1. On March 1, 2001, the Commission filed its Order Setting Prehearing Conference and Requiring Filing of Procedural Schedule directing the parties to file, no later than March 22, 2001, a proposed procedural schedule to address the Company's Purchased Gas Adjustment Factors to be Audited in its 1999-2000 Actual Cost Adjustment.
2. On March 22, 2001, the Parties filed their Joint Proposed Procedural Schedule.
3. On April 2, 2001, the Commission approved the Joint Proposed Procedural Schedule in both GR-2001-250 and GR-2001-495.
3. This schedule will dispose of any issues raised in both GR-2001-250 and GR-2001-495.
4. The cases have not been consolidated.

5. Commission Rule 4 C.S.R. 240-2.110(3) provides:

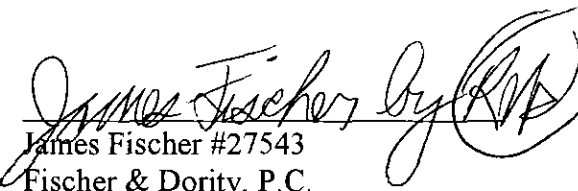
When pending actions involve related questions of law of fact, the commission may order a joint hearing of any or all matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay.

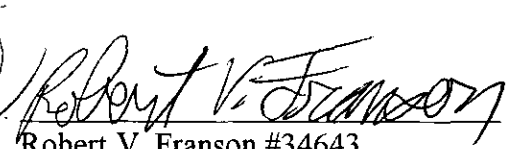
6. Case Nos. GR-2001-250 and GR-2001-495 involve common questions of law and fact in that both cases involve Fidelity Natural Gas Co.'s Purchased Gas Adjustment Factors to be Audited in Actual Cost Adjustments. Case No. GR-2001-250 involves the Company's Purchased Gas Adjustment Factors to be audited in its 1999-2000 Actual Cost Adjustment. Case No. GR-2001-495 involves the Company's Purchased Gas Adjustment Factors to be Audited in its 2000-2001 Actual Cost Adjustment.

7. The undersigned parties submit that a consolidation of GR-2001-250 and GR-2001-495 would be beneficial and would dispose of any contested issues raised in both cases.

WHEREFORE, the undersigned parties respectfully request that the Commission issue an order consolidating the two cases herein.

Respectfully submitted,


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Douglas E. Micheel by *RAH*

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Certificate of Service

I hereby certify that the foregoing Proposed Procedural Schedule has been duly served upon all parties of record to this proceeding, on this 19th day of April 2001

Robert V. Freeman

Service List for
Case No. GR-2001-250/GR-2001-495
Revised: April 19, 2001 (ccl)

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