



Commissioners

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April 6, 2000

BRIAN D. KINKADE  
Executive Director

GORDON L. PERSINGER  
Director, Research and Public Affairs

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. MX-2000-432

FILED<sup>2</sup>  
APR 06 2000  
Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **MOTION FOR FINDING OF NECESSITY FOR RULEMAKING**.

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,

David A. VanDyke  
Assistant General Counsel  
(573) 751-7485  
(573) 751-9285 (Fax)

DAV/lb  
Enclosure  
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

APR 06 2000

Missouri Public  
Service Commission

In the Matter of Amendment to Rule 4 )  
CSR 240-121.020 - Administration and )  
Enforcement )

Case No. MX-2000-432

MOTION FOR FINDING OF NECESSITY FOR RULEMAKING

COMES NOW the Director of the Department of Manufactured Homes and Modular Units of the Missouri Public Service Commission ("Director" and "Department"), by and through the Missouri Public Service Commission's Office of General Counsel, and for his Motion For Finding of Necessity For Rulemaking ("Motion") states as follows:

1. Attached as Attachment A is the Director's Recommendation to the Commission on the proposed rulemaking. Included in the Recommendation is an analysis of the fiscal impact and effectiveness of the rule, both to the state as well as to any private or public person or entity affected by this rulemaking.

2. The Director proposes to amend Rule 4 CSR 240-121.020 to replace the term "mobile home" with "manufactured home."

3. This rulemaking is necessary to provide uniformity among the rules pertaining to manufactured housing and updates this rule with current industry terminology.

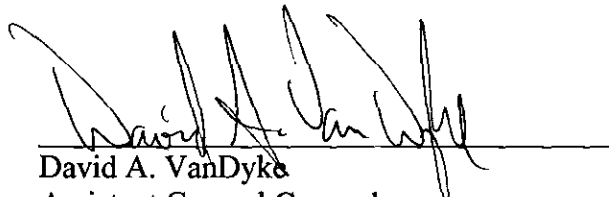
WHEREFORE, the Director respectfully requests that the Commission, based upon reasonably available empirical data including an assessment of the effectiveness and costs both to the state and to any private or public person or entity affected, find that the proposed

2

amendment to 4 CSR 240-121.020 Administration and Enforcement, is necessary to update and make uniform the rules pertaining to manufactured housing.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

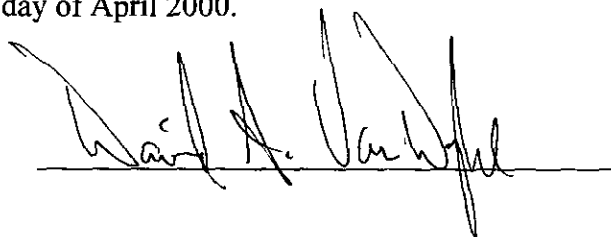


David A. VanDyke  
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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the below service list this 6th day of April 2000.



## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
Case No. MX-2000-432 Proposed Amendment to Rule 4 CSR 240-121.020  
Administration and Enforcement

FROM: Steve Jungmeyer, <sup>SY</sup> Department of Manufactured Housing and Modular Units

Wes Anderson 4-4-00  
Utility Operations Division / Date

[Signature] 4/6/00  
General Counsel's Office / Date

SUBJECT: Staff Recommendation

DATE:

4 CRS 240-121.020 – Administration and Enforcement is being amended to replace the term “mobile home” with “manufactured home”. Manufactured home is technically the correct terminology to be used.

The industry is referred to now as the manufactured housing industry producing manufactured homes, not mobile homes. This amendment removes all references to mobile homes. There is no fiscal impact on the state or any private or public person or entity resulting from this proposed rule amendment.

Staff recommends that the Commission find that a rulemaking to propose 4 CRS 240-121.020 is necessary.

Copies: Director – Utility Operations Division  
Director – Utility Services Division  
Director – Research and Public Affairs Division  
General Counsel  
Office of Public Counsel

RECEIVED  
APR - 4 2000  
DH 9:05 AM  
COMMISSION COUNSEL  
PUBLIC SERVICE COMMISSION

**Service List for  
Case No. MX-2000-432  
April 6, 2000**

**Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102**