

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

In the Matter of Missouri-American Water	)	
Company's Request for Authority to Implement	)	Case No. WR-2020-0344
General Rate Increase for Water and Sewer	)	Case No. SR-2020-0345
Service Provided in Missouri Service Areas.	)	

**MOTION TO CONSOLIDATE**

Comes now Missouri-American Water Company (MAWC or Company), and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. MAWC has filed with the Commission tariff sheets and direct testimony seeking a general rate increase for both its water and sewer operations. Two case numbers have resulted from these filings (WR-2020-0344 and SR-2020-0345).

2. The subject water and sewer operations are owned and operated by the same entity (MAWC) and have common offices, personnel and overheads.

3. Accordingly, there are common questions of law and fact in the above-referenced cases and the consolidation of Cases Nos. WR-2020-0344 and SR-2020-0345 would be administratively expedient in that it would simplify the filings to be made by MAWC and the other parties to these matters.

4. The Commission has stated, "Commission Rule 20 CSR 4240-2.110(3) allows for the consolidation of cases with related questions of law or fact."<sup>1</sup>

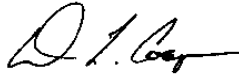
WHEREFORE, MAWC requests a Commission order consolidating Cases Nos. WR-2020-

---

<sup>1</sup> Order Consolidating Cases, *In the Matter of Confluence Rivers Utility Operating Company, Inc's Request for a Water Rate Increase*, File No. WR-2020-0053 (October 15, 2019).

0344 and SR-2020-0345, with Case No. WR-2020-0344 being the lead case.

Respectfully submitted,



---

William R. England, III, MBE#23975  
Dean L. Cooper, MBE #36592  
**BRYDON, SWEARENGEN & ENGLAND P.C.**  
312 E. Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65012  
(573) 635-7166 telephone  
(573) 635-3847 facsimile  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

Timothy W. Luft, Mo Bar 40506  
MISSOURI-AMERICAN WATER COMPANY  
727 Craig Road  
St. Louis, MO 63141  
(314) 996-2279  
(314) 997-2451 (telefax)  
[Timothy.Luft@amwater.com](mailto:Timothy.Luft@amwater.com)

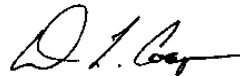
**ATTORNEYS FOR MISSOURI-AMERICAN  
WATER COMPANY**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on June 30, 2020, to the following:

Office of the General Counsel  
Governor Office Building  
Jefferson City, MO 65101  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Office of the Public Counsel  
Governor Office Building  
Jefferson City, MO 65101  
[opc@opc.mo.gov](mailto:opc@opc.mo.gov)



---