

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

In the Matter of Missouri-American)
Water Company for a Certificate of)
Convenience and Necessity Authorizing it)
to Install, Own, Acquire, Construct,)
Operate, Control, Manage and Maintain a)
Water and Sewer System in an area of)
Pettis County, Missouri (Monsees Lake)
Estates Subdivision).)

File Nos. WA-2022-0229
SA-2022-0230

MOTION TO CONSOLIDATE

COMES NOW Missouri-American Water Company (“MAWC”), by and through the undersigned counsel, and for its *Motion to Consolidate* states as follows to the Missouri Public Service Commission (“Commission”):

1. On February 25, 2022, MAWC filed an application requesting permission and approval for a certificate of convenience and necessity to install, own, acquire, construct, operate, control, manage, and maintain a water system and sewer system in Pettis County, Missouri in a subdivision known as Monsees Lake Estates Subdivision. The cases were assigned File Nos. WA-2022-0229 and SA-2022-0230.

2. In both cases MAWC is the applicant and the subject water and sewer matters concern systems owned and operated by Monsees Lake Estates Homeowners Association. There are common questions of law and fact in Files Nos. WA-2022-0229 and SA-2022-0230 and consolidation of the referenced cases would aid in administrative efficiency. Consolidation would simplify the filings to be made by the parties to these matters.

3. Previous cases of this nature have been consolidated for the ease of filings and discovery. Commission Rule 20 CSR 4240-2.110(3) allows the Commission to consolidate

pending actions involving related questions of law or fact. Thus, MAWC requests the Commission consolidate these cases, designating WA-2022-0229 as the lead case.

WHEREFORE, MAWC requests the Commission issue an order consolidating Files Nos. WA-2022-0229 and SA-2022-0230, designating File No. WA-2022-0229 as the lead case, and grant such further and other relief as is just and proper in the circumstances.

Respectfully submitted,

/s/ Jennifer L. Hernandez

Dean L. Cooper, Mo. Bar #36592

Jennifer L. Hernandez, Mo. Bar #59814

BRYDON, SWEARENGEN & ENGLAND P.C.

312 East Capitol Avenue

P.O. Box 456

Jefferson City, MO 65102-0456

Telephone: (573) 635-7166

Facsimile: (573) 635-0427

dcooper@brydonlaw.com

jhernandez@brydonlaw.com

Timothy W. Luft, Mo. Bar #40506

Corporate Counsel

MISSOURI-AMERICAN WATER COMPANY

727 Craig Road

St. Louis, MO 63141

(314) 996-2279 telephone

(314) 997-2451 facsimile

timothy.luft@amwater.com

**ATTORNEYS FOR MISSOURI-AMERICAN
WATER COMPANY**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 3rd day of March 2022, to all counsel of record.

/s/ Jennifer L. Hernandez