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June 16, 2000

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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. ST-2000-694

Dear Mr. Roberts:

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

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,

Nathan Williams  
Assistant General Counsel  
(573) 751-8702  
(573) 751-9285 (Fax)

NW/df  
Enclosure  
cc: Counsel of Record

FILED<sup>2</sup>  
JUN 16 2000

Missouri Public  
Service Commission

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

**FILED<sup>2</sup>**  
JUN 16 2000  
Missouri Public  
Service Commission

In the Matter of Warren County Water and )  
Sewer Company's Tariff Designed to )  
Increase Connection Fees for Sewer )  
Service. )

Case No. ST-2000-694

**STAFF'S MOTION TO CONSOLIDATE CASES**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its Motion to Consolidate Cases states as follows:

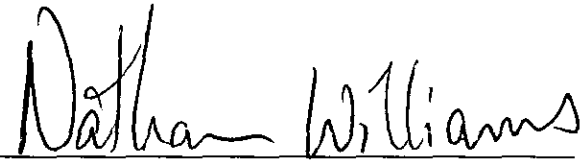
1. The parties in Cases Nos. ST-2000-694 and WT-2000-695 are the same.
2. The subject matter in issue in Case No. ST-2000-694 is a proposed increase to sewer service connection fees and the subject matter in issue in Case No. WT-2000-695 is a proposed increase to water service connection fees.
3. The Office of the Public Counsel and Staff have raised in their Motions to Suspend Tariff that created both cases the same concerns that the proposed increases may be due to Warren County Water and Sewer Co. opting to perform boring for new connections rather than less expensive road cuts as a result of complaints from it having performed shoddy work on road cuts in the past.
4. The procedural schedules for each case proposed by the Staff are the same.
5. The Regulatory Law Judge presiding in this case has requested the Staff to file motions to consolidate these cases.

6. Economy of resources and avoidance of duplicative effort will be served by consolidation of Cases Nos. ST-2000-694 and WT-2000-695, and no party will suffer prejudice by such consolidation.

WHEREFORE, for all the foregoing reasons, the Staff requests that the Commission consolidate the above cases for all purposes.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

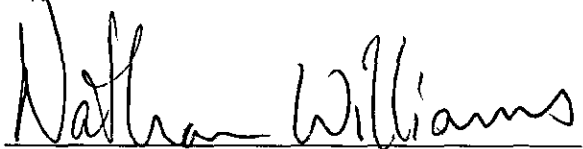


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Missouri Bar No. 35512

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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 attached service list this 16th day of June 2000.



Nathan Williams

Service List for  
Case No. ST-2000-694  
June 16, 2000

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