

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

**In the Matter of Elm Hills Utility Operating)
Company, Inc’s Request for a Sewer Rate) File No. SR-2020-0274
Increase)**

**In the Matter of Elm Hills Utility Operating)
Company, Inc’s Request for a Water Rate) File No. WR-2020-0275
Increase)**

MOTION TO CONSOLIDATE

COMES NOW Elm Hills Utility Operating Company, Inc. (“Elm Hills”), by and through the undersigned counsel, and for its *Motion to Consolidate* states as follows to the Missouri Public Service Commission (“Commission”):

1. On March 6, 2020, Elm Hills filed notices opening two Staff assisted rate cases under Commission Rule 20 CSR 4240-10.075. The cases were assigned File Nos. SR-2020-0274 and WR-2020-0275.

2. Both cases reference the same public utility, contain common questions of law and fact, and will contain primarily the same filings. Previous cases of this nature have been consolidated for the ease of filings and discovery.

3. The Commission recently ordered the consolidation of Confluence Rivers Utility Operating Company, Inc.’s similar staff assisted rate cases in File Nos. WR-2020-0053 and SR-2020-0054. The Commission’s *Order Consolidating Cases* stated, “Commission Rule 20 CSR 4240-2.110(3) allows for the consolidation of cases with related questions of law or fact.¹”

4. Elm Hills requests the Commission consolidate its two Staff assisted rate cases as

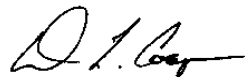
¹ Order Consolidating Cases, *In the Matter of Confluence Rivers Utility Operating Company, Inc’s Request for a Water Rate Increase*, File No. WR-2020-0043 (October 15, 2019).

they contain related questions of law or fact, designating WR-2020-0275 as the lead case. Further, Elm Hills requests the Commission direct the parties to designate if a filing or content of a filing pertains only to a specific system.

5. Counsel for the Commission Staff and Office of the Public Counsel have stated that they have no objection to this motion.

WHEREFORE, Elm Hills Utility Operating Company, Inc., requests a Commission order consolidating Files Nos. SR-2020-0274 and WR-2020-0275, designating File No. WR-2020-0275 as the lead case, and grant such further and other relief as is just and proper in the circumstances.

Respectfully submitted,



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**ATTORNEYS FOR ELM HILLS UTILITY
OPERATING COMPANY, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on this 13th day of March 2020, to all counsel of record.

/s/ Jennifer L. Hernandez