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

In the Matter of the Application of Confluence Rivers	)	
Utility Operating Company, Inc., for Certificates of	)	
Convenience and Necessity to Provide Water and	)	File Nos. WA-2023-0092
Sewer Service in an Area of St. Charles County,	)	SA-2023-0093
Missouri (Stone Ridge Meadows).	)	

## **MOTION TO CONSOLIDATE**

**COMES NOW** Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers") and for its *Motion to Consolidate* states as follows to Missouri Public Service Commission ("Commission"):

- 1. On September 9, 2022, Confluence Rivers filed an *Application and Motion For Waiver* requesting authority from the Commission to acquire all or substantially all of the water and sewer system assets of the currently unregulated systems of Stone Ridge Meadows Home Owners Association, Inc. ("Stone Ridge"), and permission, approval and Certificates of Convenience and Necessity to construct, install, own, operate, maintain, control and manage the water and sewer systems for the public as an addition to Confluence Rivers' existing service territories. The cases were assigned File Nos. WA-2023-0092 and SA-2023-0093.
- 2. In both cases, Confluence Rivers is the applicant and the water and sewer system assets are owned by Stone Ridge. There are common questions of law and fact in File Nos. WA-2023-0092 and SA-2023-0093 and consolidation of the referenced cases would aid in administrative efficiency. Consolidation would simplify requesting discovery and 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, Confluence Rivers requests the Commission consolidate these cases, designating WA-2023-0092 as the lead case.

**WHEREFORE**, Confluence Rivers requests the Commission issue an order consolidating File Nos. WA-2023-0092 and SA-2023-0093, designating File No. WA-2023-0092 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 CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 9th day of September 2022 to all counsel of record.

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