

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

In the Matter of the Petition of)	
Missouri-American Water Company for)	File Nos. <u>WO-2021-0428</u>
Approval to Establish a Water and Sewer)	<u>SO-2021-0429</u>
Infrastructure Rate Adjustment ("WSIRA"))	

MOTION TO CONSOLIDATE

COMES NOW Missouri-American Water Company ("MAWC"), by and through the undersigned counsel, and pursuant to 20 CSR 4240-2.110(3) files this *Motion to Consolidate* and states as follows to the Missouri Public Service Commission ("Commission"):

1. On September 3, 2021, MAWC filed a *Petition to Establish a Water and Sewer Infrastructure Rate Adjustment and Motion for Approval of Customer Notice* ("Petition") with the Commission. MAWC seeks to establish a Water and Sewer Infrastructure Rate Adjustment ("WSIRA") to provide for the recovery of costs for infrastructure system projects eligible for WSIRA recognition. The Commission assigned File Nos. WO-2021-0428 and SO-2021-0429 to the *Petition*.

2. MAWC is the applicant in both above-captioned cases. The cases reference the same subject matter, will involve similar parties, will contain common questions of law and fact, and will contain primarily the same filings. Consolidation would promote administrative efficiency for filings and any discovery.

3. Pursuant to Commission Rule 20 CSR 240-2.110(3), the Commission may issue orders concerning pending cases to avoid unnecessary costs or delays if the actions involve related questions of law or fact. MAWC requests the Commission consolidate the above-captioned cases, designating WO-2021-0428 as the lead case.

WHEREFORE, MAWC requests the Commission issue an order: consolidating File Nos. WO-2021-0428 and SO-2021-0429; designating File No. WO-2021-0428 as the lead case; directing the parties to designate if a filing or the content of a filing pertains to a specific system; and granting such further and other relief as is just and proper in the circumstances.

Respectfully submitted,



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**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 to all counsel of record this 8th day of September 2021.

