

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

In the Matter of the Petition of	)	
Missouri-American Water Company for	)	<b><u>File Nos. WO-2023-0008</u></b>
Approval to Change a Water and Sewer	)	<b><u>SO-2023-0009</u></b>
Infrastructure Rate Adjustment (WSIRA).	)	

**MOTION TO CONSOLIDATE**

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

1. On September 9, 2022, MAWC filed a *Petition to Change a Water and Sewer Infrastructure Rate Adjustment (WSIRA)* (“*Petition*”) requesting Commission approval to change its WSIRA to provide for the recovery of costs for infrastructure system projects eligible for WSIRA recognition. The Commission assigned File Nos. WO-2023-0008 and SO-2023-0009 to the *Petition*.

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

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 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-2023-0008 as the lead case.

**WHEREFORE**, MAWC requests the Commission issue an order consolidating Files Nos. WO-2023-0008 and SO-2023-0009, designating File No. WO-2023-0008 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 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 9<sup>th</sup> day of September 2022.

