

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

In the Matter of the Application of)	
Confluence Rivers Utility Operating Company, Inc.,)	
For Authority to Acquire Certain Water and Sewer)	File Nos. WA-2019-0299
Assets and for a Certificate of Convenience and)	and SA-2019-0300
Necessity)	

MOTION TO CONSOLIDATE

Under authority of, and in accordance with, 4 CSR 240-2.080, Confluence Rivers Utility Operating Company, Inc. (Confluence Rivers) files its Motion to Consolidate File Nos. WA-2019-0299 and SA-2019-0300.

1. On March 29, 2019, Confluence Rivers filed an application seeking Commission authority to: (a) acquire all or substantially all assets Port Perry Service Company (Port Perry) owns and uses to provide water and sewer utility, and (b) for certificates of convenience and necessity to own, install, construct, operate, control, manage, and maintain the acquired assets. Upon filing, two matter numbers were assigned that application: WA-2019-0299 and SA-2019-0300.

2. Under 4 CSR 240-2.110(3), when pending actions involve related questions of law or fact the Commission may order a joint hearing of any or all matters or take such other action it deems reasonable to avoid unnecessary costs or delay.

3. Because File Nos. WA-2019-0299 and SA-2019-0300 involve or relate to a single transaction where Confluence Rivers proposes to acquire all or substantially all water and sewer assets owned by Port Perry and used to provide water and sewer utility services in a common geographic area in Perry County, Missouri, all material questions of law and fact are common to both cases. Therefore, consolidation of the two cases, for purposes of hearing and otherwise,

would promote administrative convenience and avoid unnecessary costs or delay.

WHEREFORE, Confluence Rivers requests the Commission issue an order consolidating Files Nos. WA-2019-0299 and SA-2019-0300 for all purposes, with File No. WA-2019-0299 designated as the lead case.

Respectfully submitted,

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**ATTORNEYS FOR CONFLUENCE RIVERS
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on April 1, 2019, to the following:

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