

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

In the Matter of Missouri-American Water)	
Company for a Certificate of Convenience)	
and Necessity Authorizing it to Install, Own,)	
Acquire, Construct, Operate, Control,)	<u>File No. WA-2023-0345</u>
Manage and Maintain a Water System and)	<u>File No. SA-2023-0346</u>
Sewer System in and around the City of)	
Wood Heights, Missouri)	

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 April 5, 2023, MAWC filed an *Application and Motion for Waiver* requesting authority from the Commission to purchase the water and sewer utility assets of the City of Wood Heights, Missouri (“Wood Heights”), and permission, approval and a Certificate of Convenience and Necessity to install, own, acquire, construct, operate, control, manage and maintain water and sewer systems for the public in an area in and around Wood Heights, Missouri. The cases were assigned File Nos. WA-2023-0345 and SA-2023-0346.

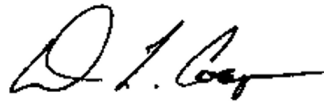
2. In both cases, MAWC is the applicant and the water and sewer assets are owned by Wood Heights. The cases reference the same subject matter, will involve similar parties, and will contain common questions of law and fact. Consolidation of File Nos. WA-2023-0345 and SA-2023-0346 would promote administrative 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. Thus, MAWC requests the Commission consolidate the above-captioned cases, designating WA-2023-0345 as the lead case.

WHEREFORE, MAWC requests the Commission issue an order consolidating File Nos. WA-2023-0345 and SA-2023-0346, designating File No. WA-2023-0345 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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