

**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) **File Nos. WA-2023-0450**
Acquire Certain Water and Sewer Assets and for) **SA-2023-0451**
Certificates of Convenience and Necessity)

MOTION TO CONSOLIDATE

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

1. On June 30, 2023, Confluence Rivers filed an *Application and Motion for Waiver* requesting authority from the Commission to acquire all or substantially all of the water and/or sewer system assets of the currently unregulated systems of Brussels Valley Estates, Inc. (sewer), Chevron/Sierra Land Company, LLC (water and sewer), and Mapaville Meadows (sewer), and permission, approval and Certificates of Convenience and Necessity to operate the systems and provide service to the public. The cases were assigned File Nos. WA-2023-0450 and SA-2023-0451.

2. In both cases, Confluence Rivers is the applicant. 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-2023-0450 and SA-2023-0451 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, Confluence Rivers requests the Commission consolidate the above-captioned cases, designating WA-2023-0450 as the lead case.

WHEREFORE, Confluence Rivers requests the Commission issue an order consolidating File Nos. WA-2023-0450 and SA-2023-0451, designating File No. WA-2023-0450 as the lead case, and grant such further and other relief as is just and proper in the circumstances.

Respectfully submitted,

/s/ Jennifer L. Hernandez

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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 this 17th day of July 2023 to all counsel of record.

/s/ Jennifer L. Hernandez