

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

In the Matter of the Application of Confluence)	
Rivers Utility Operating Company, Inc., for)	File Nos. WF-2023-0023
Authority to Issue Long-Term Debt and to Secure)	SF-2023-0024
Same with a Lien on its Property)	

MOTION TO CONSOLIDATE

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

1. On August 1, 2022, Confluence Rivers filed an *Application and Motion For Waiver* requesting authority from the Commission to issue long-term debt to CoBank, ACB ("CoBank"), in an amount not to exceed \$7,200,000. Confluence Rivers also requests authority from the Commission to secure the long-term indebtedness to CoBank by a statutory lien on all equity Confluence Rivers may own now or hereafter acquire, and a perfected priority lien on and security interest in all real and personal, tangible and intangible, present and future assets of Confluence Rivers. The cases were assigned File Nos. WF-2023-0023 and SF-2023-0024.

2. In both cases, Confluence Rivers is the applicant. There are common questions of law and fact in File Nos. WF-2023-0023 and SF-2023-0024 and consolidation of the referenced cases would aid in administrative efficiency. Consolidation would simplify requesting discovery and the filings to be made by the parties to these matters.

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 consolidate pending actions involving related questions of law or fact. Thus, Confluence Rivers requests the Commission consolidate these cases, designating WF-2023-0023 as the lead case.

WHEREFORE, Confluence Rivers requests the Commission issue an order consolidating File Nos. WF-2023-0023 and SF-2023-0024, designating File No. WF-2023-0023 as the lead case, and grant such further and other relief as is just and proper in the circumstances.

Respectfully submitted,



Dean L. Cooper, Mo. Bar #36592
Jennifer L. Hernandez, Mo. Bar #59814
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
Telephone: (573) 635-7166
Facsimile: (573) 635-0427
dcooper@brydonlaw.com
jhernandez@brydonlaw.com

L. Russell Mitten, Mo. Bar #27881
David L. Woodsmall, Mo. Bar #40747
CENTRAL STATES WATER RESOURCES
1630 Des Peres Rd., Suite 140
Des Peres, MO 63131
dwoodsmall@cswrgroup.com

**ATTORNEYS FOR CONFLUENCE RIVERS
UTILITY OPERATING COMPANY, INC.**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 2nd day of August 2022 to all counsel of record.

