

**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,)
Manage and Maintain a Water System and)
Sewer System in and around the City of)
Smithton, Missouri.)
File Nos. WA-2023-0071
SA-2023-0072

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 August 12, 2022, MAWC filed an *Application And Motion For Waiver* requesting permission and approval for a certificate of convenience and necessity to install, own, acquire, construct, operate, control, manage, and maintain a water system and sewer system in and around the City of Smithton, Missouri. The cases were assigned File Nos. WA-2023-0071 and SA-2023-0072.

2. In both cases MAWC is the applicant and the subject water and sewer matters concern systems owned by the City of Smithton. There are common questions of law and fact in Files Nos. WA-2023-0071 and SA-2023-0072 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, MAWC requests the Commission consolidate these cases, designating WA-2023-0071 as the lead case.

WHEREFORE, MAWC requests the Commission issue an order consolidating Files Nos. WA-2023-0071 and SA-2023-0072, designating File No. WA-2023-0071 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 15th day of August 2022.

