

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

In the Matter of the Application of Confluence Rivers	)	
Utility Operating Company, Inc., for Certificates of	)	File Nos. WA-2023-0398
Convenience and Necessity to Provide Water and	)	SA-2023-0396
Sewer Service in an Area of Lincoln County,	)	
Missouri (Quail Run ).	)	

**MOTION TO CONSOLIDATE**

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

1. On May 24, 2023, Confluence Rivers filed an *Application and Motion for Waiver*, concerning the acquisition of all or substantially all of the water and sewer system assets of the currently unregulated systems of Lincoln County Water and Sewer, LLC. Confluence Rivers seeks Certificates of Convenience and Necessity (“CCN”) to operate the systems and provide service to the public. The cases were assigned File Nos. WA-2023-0398 and SA-2023-0396.

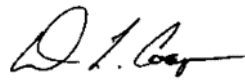
2. The applicant in both cases is Confluence Rivers and the entity from whom Confluence Rivers proposes to buy the assets, Lincoln County Water and Sewer, LLC, operates the water and sewer systems in question in both cases. The above-captioned cases will thus reference identical parties, contain common questions of law and fact, and will contain primarily the same filings. Previous cases of this nature have been consolidated for the ease of filings and discovery.

3. The Commission has stated, “Commission Rule 20 CSR 4240-2.110(3) allows for

the consolidation of cases with related questions of law or fact.<sup>1</sup>” Therefore, Confluence Rivers requests the Commission consolidate these cases, designating WA-2023-0398 as the lead case.

**WHEREFORE**, Confluence Rivers Utility Operating Company, Inc., requests a Commission order consolidating Files Nos. WA-2023-0398 and SA-2023-0396, designating File No. WA-2023-0398 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 CONFLUENCE RIVERS  
UTILITY OPERATING COMPANY, INC.**

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<sup>1</sup> Order Consolidating Cases, *In the Matter of Confluence Rivers Utility Operating Company, Inc's Request for a Water Rate Increase*, File No. WR-2020-0043 (October 15, 2019).

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on May 30, 2023, to the following:

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