

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

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc., to Acquire Certain Water) **File No. WM-2020-0403**
and Sewer Assets of Terre Du Lac Utilities)
Corporation)

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc., to Acquire Certain Water) **File No. SM-2020-0404**
and Sewer Assets of Terre Du Lac Utilities)
Corporation)

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 June 12, 2020, Confluence Rivers filed an *Application and Motion for Waiver*, concerning the proposed acquisition of certain water and sewer systems and related Certificates of Convenience and Necessity. The cases were assigned File Nos. WM-2020-0403 and SM-2020-0404.

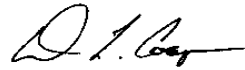
2. The applicant in both cases is Confluence Rivers. Both Confluence Rivers and the entity from whom Confluence Rivers proposes to buy the assets, Terre Du Lac Utilities Corporation, are both water and sewer corporations and parties in each case. The above-captioned cases reference the same subject matter, will involve similar 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.”¹ Therefore, Confluence Rivers requests the Commission consolidate these cases, designating WM-2020-0403 as the lead case.

4. Counsel for the Commission Staff and the Office of the Public Counsel have stated that they have no objection to this motion.

WHEREFORE, Confluence Rivers Utility Operating Company, Inc., requests a Commission order: consolidating Files Nos. WM-2020-0403 and SM-2020-0404; designating File No. WM-2020-0403 as the lead case; directing the parties to designate if a filing or the content of a filing pertains to a specific system; and granting 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.**

¹ Order Consolidating Cases, *In the Matter of Confluence Rivers Utility Operating Company, Inc's Request for a Water Rate Increase*, File No. WR-2020-0053 (October 15, 2019).

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on this 24th day of June 2020 to all counsel of record.

/s/ Jennifer L. Hernandez