

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

In the Matter of the Joint Application of 188 North)
Summit, LLC, and Seges Utility Company, LLC)
For Authority to Sell the Water System and)
Wastewater System Assets of Seges Mobile Home)
Park, LLC, to Seges Utility Company, LLC, and)
For a Certificate of Convenience and Necessity To)
Provide Water and Sewer Services.)

**File Nos. WM-2023-0065
SM-2023-0066**

MOTION TO CONSOLIDATE

COME NOW 188 North Summit, LLC, (“188NS”) and Seges Utility Company, LLC, (“Seges Utility Co.”) and for their *Motion to Consolidate* respectfully state the following to the Missouri Public Service Commission (“Commission”):

1. On August 10, 2022, 188NS and Seges Utility Co. filed a *Joint Application and Motion for Waiver* requesting permission and approval for 188NS to sell, and Seges Utility Co. to acquire, substantially all of the water and sewer assets used to provide water and sewer service to customers in 188NS’ certificated service areas. Additionally, Seges Utility Co. requests permission, approval and CCNs to install, own, acquire, construct, operate, control, manage and maintain a water system and sewer system for the public in the area of Callaway County, Missouri, currently served by 188NS. The cases were assigned File Nos. WM-2023-0065 and SM-2023-0066.

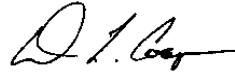
2. In both cases 188NS and Seges Utility Co. are the joint applicants and the subject water and sewer matters concern systems owned by 188NS. There are common questions of law and fact in Files Nos. WM-2023-0065 and SM-2023-0066 and consolidation of the referenced cases would aid in administrative efficiency. 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, 188NS and Seges Utility Co. request the Commission consolidate these cases, designating WM-2023-0065 as the lead case.

WHEREFORE, 188NS and Seges Utility Co. request the Commission issue an order consolidating Files Nos. WM-2023-0065 and SM-2023-0066, designating File No. WM-2023-0065 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 188 NORTH SUMMIT,
LLC AND SEGES UTILITY COMPANY, LLC**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 10th day of August 2022, to:

General Counsel's Office
staffcounsel@psc.mo.gov

Office of the Public Counsel
opcservice@opc.mo.gov

