

**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 Orrick, Missouri.)

**File Nos. WA-2022-0049
SA-2022-0050**

MOTION TO CONSOLIDATE

COMES NOW Missouri-American Water Company ("MAWC"), by and through the undersigned counsel, and pursuant to 20 CSR 4240-2.110(3) files this *Motion to Consolidate* and states as follows to the Missouri Public Service Commission ("Commission"):

BACKGROUND INFORMATION

1. On August 25, 2021, MAWC filed an *Application and Motion for Waiver* ("*Application*") with the Commission. The *Application* seeks a certificate of convenience and necessity and authority for MAWC to acquire and operate a water system and sewer system in and around the City of Orrick, Ray County, Missouri. The Commission assigned File Nos. WA-2022-0049 and SA-2022-0050 to the *Application*.

2. MAWC is the applicant in both above-captioned cases and seeks to acquire the water and sewer systems from the same seller, the City of Orrick. The cases reference the same subject matter, will involve similar parties, will contain common questions of law and fact, and will contain primarily the same filings. Previous cases of this nature have been consolidated to promote administrative efficiency for filings and any discovery.

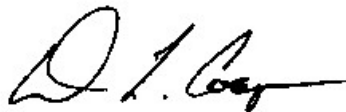
3. Pursuant to Commission Rule 20 CSR 240-2.110(3), the Commission may issue orders concerning pending cases to avoid unnecessary costs or delays if the actions involve

related questions of law or fact. MAWC requests the Commission consolidate the above-captioned cases, designating WA-2022-0049 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 the *Motion to Consolidate*.

WHEREFORE, MAWC requests the Commission issue an order: consolidating File Nos. WA-2022-0049 and SA-2022-0050; designating File No. WA-2022-0049 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 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 8th day of September 2021.

