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February 1, 2001

Mr. Dale H. Roberts Secretary/Chief Regulatory Law Judge Public Service Commission P. O. Box 360 Jefferson City, MO 65102 FILED<sup>3</sup> FEB 0 1 2001

Missouri Public Service Commission

Re: Osage Water Company Case No. SR-2000-556

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of **Motion to Consolidate.** Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

M. Ruth O'Neill

Assistant Public Counsel

MRO:jb

cc: Counsel of Record

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

5 Min
Service Court Pur
Service Commission

FILE

In The Matter of Osage Water Company's	)	
Request for a Rate Increase for Sewer Service	)	Case No. SR-2000-556
Pursuant to the Public Service Commission's	)	
Small Company Rate Increase Procedure	)	

## MOTION TO CONSOLIDATE

COMES NOW, the Office of the Public Counsel (Public Counsel) and respectfully moves the Missouri Public Service Commission (Commission) to consolidate the above styled case with Commission case number WR-2000-557. Osage Water Company (Company) is the applicant for rate increase in both cases. This motion is made for the reason that the parties and issues in the two cases are identical, and the issues in these cases can be best addressed in conjunction with one another.

Section 386.390.2 RSMo. provides that "all matters upon which complaint may be founded may be joined in one hearing." Public Counsel's objections to the proposed settlement between the PSC Staff and the Company relate, in significant part, to customer service issues related to the Company's provision of sewer and water services.

Currently, the procedural schedule for both cases is the same, except that the evidentiary hearings are scheduled for separate days. This case, SR-2000-556 is scheduled for evidentiary hearing on March 6, and case WR-2000-557 is scheduled for evidentiary hearing on March 5. Public Counsel anticipates that all evidence in regard to sewer and water matters could be heard by the Commission in a single day.

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WHEREFORE, it is respectfully requested that this Commission consolidate these cases into a single proceeding, and accelerate the scheduled hearing in SR-2000-556 by one day to Monday, March 5, 2001.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

M. Ruth O'Neill

(#49456)

**Assistant Public Counsel** 

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 1<sup>st</sup> day of February 2001:

Keith Krueger Missouri Public Service Commission P. O. Box 360 Jefferson City MO 65102 Gregory D. Williams Attorney at Law P. O. Box 431 Highway 5 at Lake Road 5-33 Sunrise Beach MO 65079