

**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-2023-0284  
Convenience and Necessity to Provide Water and ) SA-2023-0285  
Sewer Service in an Area of Johnson County, Missouri. )

**MOTION TO CONSOLIDATE**

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

1. On March 14, 2023, Confluence Rivers filed an *Application and Motion for Waiver* requesting authority from the Commission to acquire all or substantially all of the water and sewer assets of the currently unregulated systems of Four Seasons North MHP, LLC (“Four Seasons”), and permission, approval and Certificates of Convenience and Necessity to construct, install, own, operate, maintain, control and manage water and sewer systems for the public in an area of Johnson County, Missouri, as an addition to its existing service territories. The cases were assigned File Nos. WA-2023-0284 and SA-2023-0285.

2. In both cases, Confluence Rivers is the applicant and the water and sewer assets are owned by Four Seasons. The cases reference the same subject matter, will involve similar parties, and will contain common questions of law and fact. Consolidation of File Nos. WA-2023-0284 and SA-2023-0285 would promote administrative efficiency for filings and any discovery.

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 issue orders concerning pending cases to avoid unnecessary costs or delays if the actions involve related

questions of law or fact. Thus, Confluence Rivers requests the Commission consolidate the above-captioned cases, designating WA-2023-0284 as the lead case.

**WHEREFORE**, Confluence Rivers requests the Commission issue an order consolidating File Nos. WA-2023-0284 and SA-2023-0285, designating File No. WA-2023-0284 as the lead case, and grant such further and other relief as is just and proper in the circumstances.

Respectfully submitted,

**/s/ Jennifer L. Hernandez**

Dean L. Cooper MBE #36592

Jennifer L. Hernandez MBE #59814

**BRYDON, SWEARENGEN & ENGLAND P.C.**

312 E. Capitol Avenue

P.O. Box 456

Jefferson City, MO 65102

(573) 635-7166 telephone

[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

[jhernandez@brydonlaw.com](mailto:jhernandez@brydonlaw.com)

David L. Woodsmall MBE #40747

**Central States Water Resources**

1630 Des Peres Rd., Suite 140

Des Peres, MO 63131

[dwoodsmall@cswrgroup.com](mailto:dwoodsmall@cswrgroup.com)

**ATTORNEYS FOR CONFLUENCE RIVERS  
UTILITY OPERATING COMPANY, INC.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail this 15<sup>th</sup> day of March 2023 to the following:

Office of the General Counsel  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Office of the Public Counsel  
[opcservice@opc.mo.gov](mailto:opcservice@opc.mo.gov)

**/s/ Jennifer L. Hernandez**