

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

In the Matter of the Application of Elm Hills	)	
Utility Operating Company, Inc., for a	)	Files Nos. WA-2019-0235 and
Certificate of Convenience and Necessity	)	SA-2019-0236

**MOTION TO CONSOLIDATE**

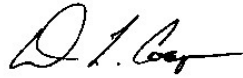
Comes now Elm Hills Utility Operating Company, Inc. (Elm Hills), and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. Elm Hills has filed an Application with the Commission seeking certificates of convenience and necessity acquire, own, install, construct, operate, control, manage, and maintain water distribution and sewer collection systems for the public in Pettis County, Missouri. Two case numbers have resulted from these filings (WA-2019-0235 and SA-2019-0236).
2. Both the subject water and sewer matters concern operations owned by a common entity and operated in a common geographic area and it is proposed that both the water and sewer assets will be purchased by Elm Hills.
3. There are common questions of law and fact in the above-referenced cases and the consolidation of Files Nos. WA-2019-0235 and SA-2019-0236 would be administratively expedient in that it would simplify the filings to be made by Elm Hills and the other parties to these matters.
4. Commission Rule “4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact.” Order Consolidating Cases, *In the Matter of the Application of Oakview Water and Sewer Company, LLC*, Case No. WA-2007-

0201 (December 4, 2006).

WHEREFORE, Elm Hills requests a Commission order consolidating Files Nos. WA-2019-0235 and SA-2019-0236, with File No. WA-2019-0235 being the lead case.

Respectfully submitted,



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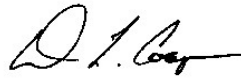
**ATTORNEYS FOR ELM HILLS UTILITY  
OPERATING COMPANY, INC.**

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on March 7, 2019, to the following:

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