

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

In the Matter of the Joint Application of Confluence)
Rivers Utility Operating Company, Inc.; Hillcrest Utility) File No. WM-2021-0412
Operating Company, Inc.; Elm Hills Utility Operating) File No. SM-2021-0413
Company, Inc.; Osage Utility Operating Company, Inc.;)
Raccoon Creek Utility Operating Company, Inc.; and)
Indian Hills Utility Operating Company, Inc. for)
Approval of a Merger Whereby Confluence Rivers Will)
Be the Surviving Corporation, and of Related)
Transactions.)

MOTION TO CONSOLIDATE

COME NOW Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”); Hillcrest Utility Operating Company, Inc. (“Hillcrest”); Elm Hills Utility Operating Company, Inc. (“Elm Hills”); Osage Utility Operating Company, Inc. (“Osage”); Raccoon Creek Utility Operating Company, Inc. (“Raccoon Creek”); and, Indian Hills Utility Operating Company, Inc. (“Indian Hills”) (collectively, “Joint Applicants”), by and through their undersigned counsel, and for their *Motion to Consolidate* state as follows to the Missouri Public Service Commission (“Commission”):

1. On June 1, 2021, the Joint Applicants filed an *Application and Motion for Waiver*, concerning the proposed merger of the Joint Applicants, with Confluence Rivers being the surviving corporation. The cases, because they involve both water corporations and sewer corporations, were assigned File Nos. WM-2021-0412 and SM-2021-0413.

2. The applicants in the two cases are largely the same.¹ While Raccoon Creek is not a water corporation and Indian Hills is not a sewer corporation, all other applicants are both

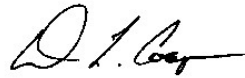
¹.

water and sewer corporations. The above-captioned cases reference the same subject matter, will involve similar parties, contain common questions of law and fact, and will contain primarily the same filings. Previous cases of this nature have been consolidated for the ease of filings and discovery.

3. The Commission has stated, “Commission Rule 20 CSR 4240-2.110(3) allows for the consolidation of cases with related questions of law or fact.”² Therefore, Joint Applicants request the Commission consolidate these matters, designating File No. WM-2021-0412 as the lead case.

WHEREFORE, Joint Applicants request a Commission order: consolidating Files Nos. WM-2021-0412 and SM-2021-0413; designating File No. WM-2021-0412 as the lead case; and granting such further and other relief as is just and proper in the circumstances.

Respectfully submitted,



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**ATTORNEYS FOR CONFLUENCE RIVERS,
HILLCREST, ELM HILLS, OSAGE, RACCOON
CREEK, AND INDIAN HILLS**

² Order Consolidating Cases, *In the Matter of Confluence Rivers Utility Operating Company, Inc's Request for a Water Rate Increase*, File No. WR-2020-0053 (October 15, 2019).

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail on June 1, 2021, to the following:

Office of the General Counsel
staffcounsel@psc.mo.gov

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

