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

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In the Matter of Missouri-American Water Company's Request for Authority to Implement A General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas.

Case No. WR-2011-0337 SR-2011-0338

## MOTION TO CONSOLIDATE

Comes now Missouri-American Water Company (MAWC or Company), and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. MAWC has filed with the Commission tariff sheets and direct testimony seeking a general rate increase for both its water and sewer operations. Two case numbers have resulted from these filings (WR-2011-0337 and SR-2011-0338).

2. The subject water and sewer operations are owned and operated by the same

entity (MAWC) and have common offices, personnel and overheads.

3. Accordingly, there are common questions of law and fact in the above-referenced cases and the consolidation of Cases Nos. WR-2011-0337 and SR-2011-0338 would be administratively expedient in that it would simplify the filings to be made by MAWC 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, MAWC requests a Commission order consolidating Cases Nos. WR-

2011-0337 and SR-2011-0338, with Case No. WR-2011-0337 being the lead case.

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 this 10<sup>th</sup> day of August, 2011, to:

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