BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in and around the City of Stewartsville, Missouri)))))	File No. WA-2022-0311
In the Matter of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in and around the City of Stewartsville, Missouri)))))	File No. SA-2022-0312

MOTION TO CONSOLIDATE

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

- 1. MAWC has filed an Application with the Commission for certificates of convenience and necessity associated with its possible purchase of the City of Stewartsville water and sewer assets. Two case numbers have resulted from these filings (WA-2022-0311 and SA-2022-0312).
- 2. Both the subject water and sewer matters concern operations owned and operated by Stewartsville. There are common questions of law and fact in the above-referenced cases and the consolidation of Files Nos. WA-2022-0311 and SA-2022-0312 would be administratively expedient in that it would simplify the filings to be made by MAWC and the other parties to these matters.

3. Commission Rule "4 CSR 240-2.110(3)¹ 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 Files Nos. WA-2022-0311 and SA-2022-0312, with File No. WA-2022-0311 being the lead case.

Respectfully submitted,

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ATTORNEYS FOR MISSOURI-AMERICAN

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¹ Now 20 CSR 4240-2.110(3).

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 11^{th} day of May 2022, to:

D1.Com

General Counsel's Office Office of the Public Counsel staffcounselservice@psc.mo.gov opcservice@opc.mo.gov