

**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, ) File No. WA-2021-0391  
Control, Manage and Maintain a Water ) SA-2021-0392  
System and Sewer System in and around )  
the City of Garden City, Missouri. )

**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 Garden City water and sewer assets. Two case numbers have resulted from these filings (WA-2021-0391 and SA-2021-0392).

2. Both the subject water and sewer matters concern operations owned and operated by Garden City. There are common questions of law and fact in the above-referenced cases and the consolidation of Files Nos. WA-2021-0391 and SA-2021-0392 would be administratively expedient in that it would simplify the filings to be made by MAWC and the other parties to these matters.

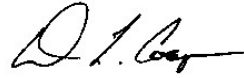
3. Commission Rule “4 CSR 240-2.110(3)<sup>1</sup> allows the Commission to consolidate pending actions involving related questions of law or fact.” Order Consolidating Cases, *In the Matter of the Application of Oakview Water and Sewer Company, LLC*, Case No. WA-2007-0201 (December 4, 2006).

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<sup>1</sup> Now 20 CSR 4240-2.110(3).

**WHEREFORE**, MAWC requests a Commission order consolidating Files Nos. WA-2021-0391 and SA-2021-0392, with File No. WA-2021-0391 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 7<sup>th</sup> day of May, 2021, to:

General Counsel's Office  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

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



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