

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

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| In the Matter of the Application of |) | |
| Confluence Rivers Utility Operating Company, |) | |
| Inc. to Acquire Certain Water and Sewer Assets, |) | File No. WM-2018-0116 |
| For a Certificate of Convenience and Necessity, |) | SM-2018-0117 |
| and, in Connection Therewith, To Issue |) | |
| Indebtedness and Encumber Assets. |) | |

MOTION TO CONSOLIDATE

COMES NOW Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”), and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. On November 2, 2017, Confluence Rivers filed an Application and Motion for Waiver for Confluence Rivers to acquire certain water and sewer assets of various water and sewer systems, along with a certificate of convenience and necessity.¹ Two case numbers resulted from these filings (WM-2018-0116 and SM-2018-0117).

2. It is proposed that all of the relevant water and sewer systems will be purchased by Confluence Rivers. Several of the sellers have both water and sewer systems.

3. There are common questions of law and fact in the above-referenced cases and the consolidation of Files Nos. WM-2018-0116 and SM-2018-0117 would be administratively expedient in that it would simplify the filings to be made by Confluence Rivers 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*

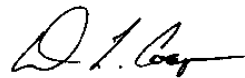
¹ On July 3, 2018, Confluence Rivers filed its Motion for Leave to Amend Application and Amendment to Application.

Matter of the Application of Oakview Water and Sewer Company, LLC, Case No. WA-2007-0201 (December 4, 2006).

5. Counsel for the Commission Staff, Office of the Public Counsel and the Lake Perry Lot Owners' Association Counsel have stated that they have no objection to this motion.

WHEREFORE, Confluence Rivers requests a Commission order consolidating Files Nos. WM-2018-0116 and SM-2018-0117, with File No. WM-2018-0116 being the lead case.

Respectfully submitted,



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**ATTORNEYS FOR CONFLUENCE RIVERS
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail on October 29, 2018, to the following:

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