

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

In the Matter of the Application of Elm Hills)	
Utility Operating Company, Inc. and)	
Missouri Utilities Company for Elm Hills to)	
Acquire Certain Water and Sewer Assets of)	Case No. SM-2017-0150
Missouri Utilities Company, for a Certificate)	Case No. WM-2017-0151
Of Convenience and Necessity, and, in)	
Connection therewith, to Issue Indebtedness)	
And Encumber Assets)	

RESPONSE TO MOTION TO CONSOLIDATE

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for its *Response to Motion to Consolidate* in this matter hereby states:

1. Elm Hills Utility Operating Company (Elm Hills) in conjunction with Missouri Utilities Company filed a Joint Application November 22, 2016, for Elm Hills to acquire certain assets and the Certificate of Convenience and Necessity of Missouri Utilities Company. Two cases were opened to accommodate this *Application*, one for the sewer and one for the water case. On December 1, 2016, Elm Hills filed a *Motion to Consolidate* the two matters.

2. Staff fully supports the *Motion to Consolidate* and recommends the Commission take such action for the sake of ease.

WHEREFORE, Staff recommends that the Commission consolidate matters SM-2017-0150 and WM-2017-0151; and grant such other and further relief as the Commission considers just in the circumstances.

Respectively submitted,

/s/ Whitney Payne

Whitney Payne

Legal Counsel

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 5th day of December, 2016, to all counsel of record.

/s/Whitney Payne