

**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,	)	File No. WA-2012-0066
Operate, Control, Manage and Maintain	)	SA-2012-0067
Water and Sewer Systems in Christian	)	
and Taney Counties, Missouri.	)	

**MOTION TO CONSOLIDATE**

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

1. On August 26, 2011, MAWC filed an Application requesting authority for MAWC to obtain certificates of convenience and necessity to install, own, acquire, construct, operate, control, manage and maintain water and sewer systems in Christian and Taney Counties, Missouri. The water assets were assigned File No. WA-2012-0066 and the sewer assets were assigned File No. SA-2012-0067.

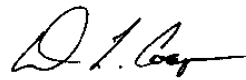
2. Commission Rule 4 CSR 240-2.110(3) states that “[w]hen pending actions involve related questions of law or fact, the commission may order a joint hearing of any or all the matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay.” The Commission has previously stated that Commission Rule 4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact. *See In the Matter of Highway H Utilities, Inc.*, Order Consolidating Cases, Case No. WA-2009-0316, 2009 Mo. PSC LEXIS 431 (May 19, 2009).

3. The above-captioned files concern a single asset purchase agreement between common parties. The analysis of the Application will involve related questions of law and fact.

4. MAWC suggests that consolidation of the two files would further judicial economy and avoid unnecessary costs or delay. For example, taking this step would allow the Commission Staff to prepare and file a single recommendation and memorandum.

**WHEREFORE**, MAWC respectfully requests that the Commission consolidate Files No. WA-2012-0066 and SA-2012-0067, with WA-2012-0066 being the lead matter.

Respectfully submitted,



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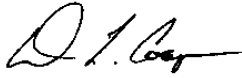
ATTORNEYS FOR MISSOURI-AMERICAN  
WATER COMPANY

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on October 4, 2011, to the following:

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