

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

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| In the Matter of the Joint Application of |) | |
| Missouri-American Water Company and |) | |
| Aqua Missouri, Inc. Aqua Development, Inc., |) | |
| and Aqua/RU, Inc. d/b/a Aqua Missouri, Inc. |) | |
| for Authority for Missouri-American Water |) | Files No. WO-2011-0168 and |
| Company to Acquire Certain Assets of |) | SO-2011-0169 |
| Aqua Missouri, Inc., Aqua Development, Inc., |) | |
| and Aqua/RU, Inc. d/b/a Aqua Missouri, Inc. |) | |
| and, in Connection Therewith, |) | |
| Certain Other Related Transactions. |) | |

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 December 13, 2010, Missouri-American Water Company (MAWC) and Aqua Missouri, Inc., Aqua Development, Inc., and Aqua/RU, Inc. d/b/a Aqua Missouri, Inc. (collectively “Aqua Missouri”) filed a Joint Application requesting authority for MAWC to acquire certain water and sewer assets of Aqua Missouri. The water assets were assigned File No. WO-2011-0168 and the sewer assets were assigned File No. SO-2011-0169.

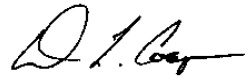
2. Commission Rule 4 CSR 240-2.110(3) states that “[w]hen pending actions involve related questions of law or fact, the commission may order a joint hearing of any or all the matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay.” The Commission has 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 Joint 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. WO-2011-0168 and SO-2011-0169, with WO-2011-0168 being the lead matter.

Respectfully submitted,



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ATTORNEYS FOR MISSOURI-AMERICAN
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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 or by U.S. Mail, postage prepaid, on December 31, 2010, to the following:

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