

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

In the Matter of Lake Region Water and Sewer	)	
Company's Application to Implement a General	)	<b><u>SR-2013-0459</u></b>
Increase in Water and Sewer Service	)	

In the Matter of Lake Region Water and Sewer	)	
Company's Application to Implement a General	)	<b><u>WR-2013-0461</u></b>
Increase in Water and Sewer Service	)	

**MOTION TO CONSOLIDATE**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for its Motion to Consolidate, pursuant to 4 CSR 240-2.110(3), hereby states:

1. On July 16, 2013, Lake Region Water & Sewer Company (Lake Region) submitted to the Missouri Public Service Commission (Commission) a tariff designed to implement a general rate increase for water and sewer utility services.

2. On July 19, 2013, the Commission issued an *Order Directing Notice, Setting Intervention Deadline, Setting Procedural Conference and Directing Filing of Proposed Procedural Schedule* in Case Nos. SR-2013-0459 and WR-2013-0461, which directed the parties to file a proposed procedural schedule on or before August 30, 2013 in each case.

3. In the interest of efficiency, and because the two cases captioned above involve related questions of law and fact, Staff requests the Commission consolidate these cases so that all filings and discovery requests/responses will be within one case file, which would prevent unnecessary costs and delay. For administrative reasons, Staff specifically requests these cases be consolidated under the WR-2013-0461 file number.

**WHEREFORE**, Staff respectfully requests the Commission consolidate Case Nos. SR-2013-0459 and WR-2013-0461 as these cases involve related questions of law and fact and because consolidating these cases will prevent unnecessary costs and delay. Staff specifically requests these cases be consolidated under WR-2013-0461.

Respectfully submitted,

**/s/ Amy E. Moore**

Amy E. Moore  
Deputy Counsel  
Missouri Bar No. 61759  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-4140 (Telephone)  
(573) 751-9285 (Fax)  
[amy.moore@psc.mo.gov](mailto:amy.moore@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 14<sup>th</sup> day of August, 2013.

**/s/ Amy E. Moore**