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

In the Matter of Liberty Utilities (Missouri	)	File No.	WR-2018-0170
Water) LLC's Application for a Rate Increase.	)		SR-2018-0171

## **MOTION TO CONSOLIDATE**

Comes now Liberty Utilities (Missouri Water) (Liberty Utilities or Company), and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

- 1. Liberty Utilities has filed with the Commission a letter, pursuant to Commission Rule 4 CSR 240-3.050, requesting rate increases for both its water and sewer operations. Two case numbers have resulted from these filings (WR-2018-0170 and SR-2018-0171).
- 2. The subject water and sewer operations are owned and operated by the same entity (Liberty Utilities) and have common offices, personnel and overheads.
- 3. Accordingly, there are common questions of law and fact in the above-referenced cases and the consolidation of Cases Nos. WR-2018-0170 and SR-2018-0171 would be administratively expedient in that it would simplify the filings to be made by Liberty Utilities 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 Matter of the Application of Oakview Water and Sewer Company*, LLC, Case No. WA-2007-0201 (December 4, 2006).

WHEREFORE, MAWC requests a Commission order consolidating Cases Nos. WR-2018-0170 and SR-2018-0171, with Case No. WR-2018-0170 being the lead case.

Respectfully submitted,

Dean L. Cooper

MBE #36592

BRYDON, SWEARENGEN & ENGLAND P.C.

312 E. Capitol Avenue

P. O. Box 456

Jefferson City, MO 65102

Phone: (573) 635-7166 dcooper@brydonlaw.com

ATTORNEYS FOR LIBERTY UTILITIES (MISSOURI WATER) LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was sent via electronic mail on this  $13^{th}$  day of January, 2018, to:

Office of the General Counsel Governor Office Building Jefferson City, MO 65101 staffcounselservice@psc.mo.gov casi.aslin@psc.mo.gov Office of the Public Counsel Governor Office Building Jefferson City, MO 65101 opcservice@ded.mo.gov

D1.Com