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

In the Matter of Missouri-American	)	
Water Company for Certificates of	)	
Convenience and Necessity Authorizing	)	
it to Install, Own, Acquire, Construct,	)	File No. WA-2017-0278
Operate, Control, Manage and Maintain	)	SA-2017-0279
Water and Sewer Systems in an area of	)	
St. Louis County, Missouri.	)	

## **MOTION TO CONSOLIDATE**

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

- 1. MAWC has filed an Application with the Commission for certificates of convenience and necessity associated with its possible purchase of the Pevely Farms Homeowner Association water and sewer assets. Two case numbers have resulted from these filings (WA-2017-0278 and SA-2017-0279).
- 2. Both the subject water and sewer matters concern operations owned and operated by the Pevely Farms Homeowner Association. There are common questions of law and fact in the above-referenced cases and the consolidation of Files Nos. WA-2017-0278 and SA-2017-0279 would be administratively expedient in that it would simplify the filings to be made by MAWC and the other parties to these matters.
- 3. 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 Files Nos. WA-

2017-0278 and SA-2017-0279, with File No. WA-2017-0278 being the lead case.

Respectfully submitted,

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ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 21<sup>st</sup> day of April, 2017, to:

General Counsel's Office staffcounselservice@psc.mo.gov

Office of the Public Counsel opcservice@ded.mo.gov