

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

In the Matter of the Joint Application of	)	
Algonquin Water Resources of Missouri, LLC,	)	
d/b/a Liberty Water and KMB Utility Corporation	)	
for Authority for Liberty Water to Acquire	)	File No. WO-2011-0350
Certain Assets of KMB Utility Corporation	)	SO-2011-0351
and, in Connection Therewith, Certain Other	)	
Related Transactions.	)	

**MOTION TO CONSOLIDATE**

COMES NOW Algonquin Water Resources of Missouri, LLC d/b/a Liberty Water (Liberty Water) and states the following to the Missouri Public Service Commission (Commission) as its Motion to Consolidate:

1. On April 22, 2011, Liberty Water and KMB Utility Corporation (KMB) filed a Joint Application requesting authority for Liberty Water to acquire the water and sewer assets of KMB. The water assets were assigned File No. WO-2011-0350 and the sewer assets were assigned File No. SO-2011-0351.

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).

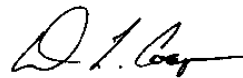
3. The above-captioned files concern a single asset purchase agreement between

common parties. The analysis of the Joint Application will involve related questions of law and fact.

4. Liberty Water 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**, Liberty Water respectfully requests that the Commission consolidate Files No. WO-2011-0350 and SO-2011-0351, with WO-2011-0350 being the lead matter.

Respectfully submitted,



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LIBERTY WATER

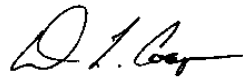
## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on April 22, 2011, to the following:

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