

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

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc., to Acquire Certain Water) File No. WM-2020-0282
and Sewer Assets, and For Certificates)
of Convenience and Necessity)

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc., to Acquire Certain Water) File No. SM-2020-0283
and Sewer Assets, and For Certificates)
of Convenience and Necessity)

MOTION TO CONSOLIDATE

COMES NOW Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”), by and through the undersigned counsel, and for its *Motion to Consolidate* states as follows to the Missouri Public Service Commission (“Commission”):

1. On March 11, 2020, Confluence Rivers filed an *Application and Motion for Waiver*, concerning the acquisition of certain water and sewer systems, along with the certificates of convenience and necessity necessary to operate those systems on a going forward basis. The cases were assigned File Nos. WM-2020-0282 and SM-2020-0283.

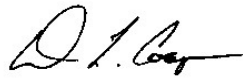
2. The applicant in both cases is Confluence Rivers and two of the entities from whom Confluence Rivers proposes to buy assets, Terre Du Lac Utilities Corporation and Branson Cedars Resort Utility Company, LLC, are both water and sewer corporations. The above-captioned cases will thus reference similar parties, contain common questions of law and fact, and will contain primarily the same filings. Previous cases of this nature have been consolidated for the ease of filings and discovery.

3. The Commission has stated, “Commission Rule 20 CSR 4240-2.110(3) allows for the consolidation of cases with related questions of law or fact.”¹ Therefore, Confluence Rivers requests the Commission consolidate these cases, designating WM-2020-0282 as the lead case.

4. Counsel for the Commission Staff and Office of the Public Counsel have stated that they have no objection to this motion.

WHEREFORE, Confluence Rivers Utility Operating Company, Inc., requests a Commission order consolidating Files Nos. WM-2020-0282 and SM-2020-0283, designating File No. WM-2020-0282 as the lead case, and grant such further and other relief as is just and proper in the circumstances.

Respectfully submitted,



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**ATTORNEYS FOR CONFLUENCE RIVERS
UTILITY OPERATING COMPANY, INC.**

¹ Order Consolidating Cases, *In the Matter of Confluence Rivers Utility Operating Company, Inc's Request for a Water Rate Increase*, File No. WR-2020-0043 (October 15, 2019).

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on this 19th day of March 2020, to all counsel of record.