

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

The Staff of the Missouri Public Service Commission,

Complainant,

vs.

Fawn Lake Water Corp. and Rachel Hackman,

Respondents.

Case No. WC-2015-0330

The Office of the Public Counsel,
An agency of the State of Missouri,

Complainant,

vs.

Fawn Lake Water Corp.,
Rachel Hackman,
A Missouri water corporation,

Respondents.

Case No. WC-2015-0340

MOTION TO CONSOLIDATE

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Consolidate*, states herein as follows:

1. On June 11, 2015, Staff filed its *Complaint* against Fawn Lake Water Corp. and its owner and operator, Rachel Hackman, charging that these Respondents, without first obtaining authorization from this Commission as required by 393.170.2, RSMo., were providing water to the public for gain, using water plant that they owned, operated and controlled; and that the water thus provided was unsafe and inadequate, in violation of § 393.130.1, RSMo. As relief, Staff seeks penalties.

2. On June 19, 2015, the Office of the Public Counsel (“OPC”) filed its *Complaint* against Fawn Lake Water Corp. and its owner and operator, Rachel Hackman, charging that these Respondents, without first obtaining authorization from this Commission as required by 393.170.2, RSMo., were providing water to the public for gain, using water plant that they owned, operated and controlled; and that the charges Respondents demanded were unjust and unreasonable because not tariffed and not approved by this Commission. As relief, OPC seeks penalties; the refund of all amounts charged and collected by Respondents; and an order requiring Respondents to seek a Certificate of Convenience and Necessity from this Commission.

3. Respondents have not yet answered either complaint.

4. Although the two complaints are not entirely identical, they are largely identical and are based upon the same alleged behavior of the Respondents. The Respondents are identical. The relief sought is largely identical. Any trial of either of these complaints will necessarily implicate the other.

5. In order to most efficiently utilize scarce administrative resources and to reduce the costs for all parties, and to safeguard Respondents’ rights of due process, Staff hereby moves that these two complaints be consolidated for all purposes.

WHEREFORE, Staff prays that the Commission will consolidate these two complaints for all purposes into Case No. WC-2015-0330; and grant such other and further relief as the Commission deems just in the premises.

Respectfully submitted,

/s/ Kevin A. Thompson

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served, by hand delivery, electronic mail, or First Class United States Mail, postage prepaid, to all parties of record on the Service List maintained for this case by the Data Center of the Missouri Public Service Commission, on this 29th day of June, 2015.

/s/ Kevin A. Thompson