

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

|                                    |   |                                     |
|------------------------------------|---|-------------------------------------|
| In the Matter of Confluence Rivers | ) |                                     |
| Utility Operating Company, Inc.'s, | ) | <b><u>Case No. WR-2020-0053</u></b> |
| Request for a Water Rate Increase  | ) |                                     |
|                                    | ) |                                     |
| In the Matter of Confluence Rivers | ) |                                     |
| Utility Operating Company, Inc.'s, | ) | <b><u>Case No. SR-2020-0054</u></b> |
| Request for a Sewer Rate Increase  | ) |                                     |

**MOTION TO CONSOLIDATE**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), through counsel, and for its *Motion to Consolidate*, respectfully states:

1. Confluence Rivers Utility Operating Company, Inc. (Confluence) filed a letter stating its intent to raise its rates for sewer and water services for customers in its Missouri service area on August 29, 2019. The case was filed under case numbers SR-2020-0054 and WR-2020-0053.

2. Both cases reference the same subject matter, have the same parties and will contain primarily the same filings. Previous cases of this nature have been consolidated for the ease of filings and the parties have been directed to designate if a filing or the content of a filing pertains to a specific system. Staff would ask that the Commission consolidate these two cases to permit all discovery and case filings to be filed in only one case.

**WHEREFORE**, Staff prays that the Commission will accept this *Motion to Consolidate*; consolidate case numbers SR-2020-0054 and WR-2020-0053; and grant such further and other relief as is just in the circumstances.

Respectfully submitted,

**/s/ Whitney Payne**

Whitney Payne

Senior Counsel

Missouri Bar No. 64078

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-8706 (Telephone)

(573) 751-9285 (Fax)

[whitney.payne@psc.mo.gov](mailto:whitney.payne@psc.mo.gov)

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 1st day of October, 2019, to all counsel of record.

**/s/ Whitney Payne**