BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Confluence Rivers Utility)	
Operating Company, Inc., Request for Authority)	
to Implement a General Rate Increase for Water)	File Nos. WR-2023-0006
Service and Sewer Service Provided in Missouri)	SR-2023-0007
Service Areas.	j	

MOTION TO CONSOLIDATE

COMES NOW Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers") and for its *Motion to Consolidate* states as follows to Missouri Public Service Commission ("Commission"):

- 1. On December 21, 2022, Confluence Rivers filed tariff sheets and direct testimony to initiate general rate case proceedings. Confluence Rivers seeks an increase in its water and sewer rates and to unify the terms of service and consolidate rates statewide. The cases were assigned File Nos. WR-2023-0006 and SR-2023-0007.
- 2. The subject water and sewer operations are owned and operated by the same entity (Confluence Rivers) and have common offices, personnel, and overheads.
- 3. Accordingly, there are common questions of law and fact in the above-referenced cases and consolidation would be administratively expedient in that it would simplify requesting discovery and the filings to be made by Confluence Rivers and the parties to these matters.
- 4. Previous cases of this nature have been consolidated for the ease of filings and discovery. The Commission has stated that Rule 20 CSR 4240-2.110(3) allows the Commission to consolidate cases with related questions of law or fact. ¹ Thus, Confluence Rivers requests the

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¹ Order Consolidating Cases, In the Matter of Confluence Rivers Utility Operating Company, Inc's Request for a Water Rate Increase, File No. WR-2020-0053 (October 15, 2019).

Commission consolidate these cases, designating WR-2023-0006 as the lead case.

WHEREFORE, Confluence Rivers requests the Commission issue an order consolidating File Nos. WR-2023-0006 and SR-2023-0007, designating File No. WR-2023-0006 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.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 22nd day of December 2022 to all counsel of record.