

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

In the Matter of an Investigation into the)
Operation and Condition of Liberty Utilities)
(Missouri Water), LLC d/b/a Liberty Utilities)

Case No. WO-2022-0253
Case No. SO-2022-0254

MOTION TO CONSOLIDATE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through counsel, and moves the Commission for an order consolidating WO-2022-0253 and SO-2022-0254. Staff states in support of this motion:

1. On March 23, 2022, Staff filed *Staff’s Motion to Open an Investigatory Docket* to investigate the operation and condition of the water and sewer utilities of Liberty Utilities (Missouri Water), LLC d/b/a Liberty. These dockets are assigned case numbers WO-2022-0253 and SO-2022-0254.

2. Commission rule 20 CSR 4240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact.¹

3. There are common questions of law and fact in the above-referenced cases and their consolidation would be administratively expedient and simplify filings.

WHEREFORE, Staff requests that the Commission issue an order consolidating Case Nos. WO-2022-0253 and SO-2022-0254, with Case No. WO-2022-0253 being the lead case in which all pleadings are filed.

¹ *Order Consolidating Cases, WA-2007-0201, In the Matter of the Application of Oakview Water and Sewer Co., LLC* (Dec 4, 2006).

Respectfully submitted,

/s/ Karen E. Bretz

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 28th day of March, 2022.

/s/ Karen E. Bretz