

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

In the Matter of the Petition of	)	
Missouri-American Water Company for	)	<b>File Nos. <u>WO-2023-0427</u></b>
Approval to Establish a Water and Sewer	)	<b><u>SO-2023-0428</u></b>
Infrastructure Rate Adjustment (WSIRA).	)	

**MOTION TO CONSOLIDATE**

**COMES NOW** Missouri-American Water Company ("MAWC"), by and through the undersigned counsel, and pursuant to 20 CSR 4240-2.110(3) files this *Motion to Consolidate* and states as follows to the Missouri Public Service Commission ("Commission"):

1. On September 1, 2023, MAWC filed a *Petition to Establish a Water and Sewer Infrastructure Rate Adjustment and Motion for Approval of Customer Notice* with the Commission. MAWC seeks to establish a WSIRA to provide for the recovery of costs for infrastructure system projects eligible for WSIRA recognition. The Commission assigned File Nos. WO-2023-0427 and SO-2023-0428 to the *Petition*.

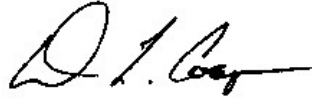
2. MAWC is the applicant in both above-captioned cases. The cases reference the same subject matter, will involve similar parties and will contain common questions of law and fact. Consolidation would promote administrative efficiency for filings and any discovery.

3. Pursuant to Commission Rule 20 CSR 4240-2.110(3), the Commission may issue orders concerning pending cases to avoid unnecessary costs or delays if the actions involve related questions of law or fact. MAWC requests the Commission consolidate the above-captioned cases, designating WO-2023-0427 as the lead case.

**WHEREFORE**, MAWC requests the Commission issue an order: consolidating File Nos. WO-2023-0427 and SO-2023-0428; designating File No. WO-2023-0427 as the lead case; and

granting such further and other relief as is just and proper in the circumstances.

Respectfully submitted,



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**ATTORNEYS FOR MISSOURI-AMERICAN  
WATER COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing document was sent via electronic mail on this 1<sup>st</sup> day of September 2023 to:

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