

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

Derald Morgan,)	
)	
Complainant)	
)	
v.)	
)	<u>File No. WC-2021-0223</u>
Carl R. Mills Water Service d/b/a Carl)	
Richard Mills,)	
)	
Respondent)	

STAFF RESPONSE TO MOTION TO CONSOLIDATE

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

1. On January 13, 2021, Derald Morgan filed a formal complaint against Carl R. Mills Water Service d/b/a Carl Richard Mills, a public utility regulated by the Commission. Mr. Morgan also requested that this complaint be consolidated with the current rate case of Carl Richard Mills, File No. WR-2021-0177.
2. On January 14, 2021, the Commission issued a *Notice of Complaint and Order Directing Respondent to File Answer and Response* and directed Carl Richard Mills to file an answer to the complaint no later than February 16, 2021. The Commission further directed that any response to the motion to consolidate case files shall be filed no later than February 16, 2021.

3. Staff has reviewed Mr. Morgan's complaint. The claims Mr. Morgan alleges are the types of operations and maintenance issues and concerns that Staff reviews in the normal course of undergoing its Staff assisted rate case audit and review.¹ It would be administratively burdensome, and redundant, for Mr. Morgan's complaint to remain separate from the active Carl Richard Mills rate case. As such, if the Commission sustains Mr. Morgan's complaint, Staff recommends the Commission grant Mr. Morgan's motion to consolidate this complaint with the current rate case of Carl Richard Mills, File No. WR-2021-0177.

WHEREFORE, Staff submits this response and requests to the extent the Commission sustains Derald Morgan's complaint, the Commission grant Derald Morgan's motion to consolidate this complaint with the current rate case of Carl Richard Mills, File No. WR-2021-0177; and grant any such other and further relief as is reasonable under the circumstances.

Respectfully submitted,

/s/ Jamie S. Myers

Jamie S. Myers
Associate Counsel
Missouri Bar No. 68291
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102
(573) 526-6036 (Telephone)
(573) 751-9285 (Facsimile)
jamie.myers@psc.mo.gov

¹ The Carl Richard Mills rate case, File No. WR-2021-0177, was filed pursuant to Commission Rule 20 CSR 4240-10.075 Staff Assisted Rate Case Procedure.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all parties and/or their counsel of record this 16th day of February, 2021.

/s/ Jamie S. Myers