

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

The Office of the Public Counsel,	)	
COMPLAINANT	)	
	)	
v.	)	Case No. WC-2014-0138
	)	
Missouri-American Water Company,	)	
RESPONDENT.	)	

Don Van Meter,	)	
COMPLAINANT	)	
	)	
v.	)	Case No. WC-2014-0185
	)	
Missouri-American Water Company,	)	
RESPONDENT.	)	

Jill Faeth,	)	
COMPLAINANT	)	
	)	
v.	)	Case No. WC-2014-0186
	)	
Missouri-American Water Company,	)	
RESPONDENT.	)	

John Graham,	)	
COMPLAINANT	)	
	)	
v.	)	Case No. WC-2014-0187
	)	
Missouri-American Water Company,	)	
RESPONDENT.	)	

Ricahrd & LeaAnn Perkins,	)	
COMPLAINANT	)	
	)	
v.	)	Case No. WC-2014-0188
	)	
Missouri-American Water Company,	)	
RESPONDENT.	)	

Robert Zignego,  
COMPLAINANT

v.

Missouri-American Water Company,  
RESPONDENT.

)  
)  
)  
)  
)  
)  
)

Case No. WC-2014-0190

### **ENTRY OF APPEARANCE AND REQUEST FOR CONSOLIDATION**

Now comes Timothy W. Luft and enters his appearance on behalf of Missouri-American Water Company ("MAWC") in the above referenced proceedings.

### **REQUEST FOR CONSOLIDATION**

MAWC respectfully requests that pursuant to 4 CSR 240-2.110(3), as well as the Orders issued on November 22, 2103 and December 18, 2013 in Case Number WC-2014-0138 that these cases be consolidated as part of Case Number WC-2014-0138, and in support states as follows:

1. Commission Rule 4 CSR 240-2.110(3) states that "[w]hen pending actions involve related questions of law or fact, the commission may order a joint hearing of any or all the matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay." The Commission has previously stated that Commission Rule 4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact. *See In the Matter of Highway H Utilities, Inc.*, Order Consolidating Cases, Case No. WA-2009-0316, 2009 Mo. PSC LEXIS 431 (May 19, 2009).

2. The above-captioned cases concern billing issues related almost exclusively to one subdivision, due to a single event, where MAWC provides service under a common tariff. These complaints involve related questions of law and fact.

3. MAWC suggests that consolidation of these actions in Case Number WC-2014-0138 would further judicial economy and avoid unnecessary costs or delay.

WHEREFORE, MAWC respectfully requests that the Commission consolidate Case Numbers WC-2014-0185, WC-2014-0186, WC-214-0187, WC-214-0188, and WC-2014-0190 in the existing consolidated lead matter WC-2014-0138.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

By: /s/ Timothy W. Luft  
Timothy W. Luft, MO Bar 40506  
727 Craig Road  
St. Louis, MO 63141  
timothy.luft@amwater.com  
(314) 996-2279 (telephone)  
(314) 997-2451 (facsimile)

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was filed electronically and served either electronically or mailed postage prepaid the 18<sup>th</sup> day of December, 2013 to:

Office General Counsel  
P.O. Box 360  
200 Madison Street, Suite 800  
Jefferson City, MO 65102  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Mr. Lewis Mills  
Office of the Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
[opc@ded.mo.gov](mailto:opc@ded.mo.gov)

Christina Baker  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
[opc@ded.mo.gov](mailto:opc@ded.mo.gov)  
[Christina.baker@ded.mo.gov](mailto:Christina.baker@ded.mo.gov)

Amy Moore  
Missouri Public Service Commission  
P.O. Box 360  
200 Madison Street, Suite 800  
Jefferson City, MO 65012  
[amy.moore@psc.mo.gov](mailto:amy.moore@psc.mo.gov)

Gerald Swinehart  
242 Mountain View Ct  
Branson West, MO 65737

Gary Absher  
56 Mountain View Ct  
Branson West, MO 65737

Mike & Ann Youngs  
617 Crossing Dr.  
Reeds Spring, MO 65737

William D. Perryman  
1401 Stoneycreek Circle #16  
Branson West, MO 65737  
[perry@persons@yahoo.com](mailto:perry@persons.yahoo.com)

Darf Manthe  
37 Bogey Lane  
Branson West, MO 65737  
[dmanthe@suddenlink.net](mailto:dmanthe@suddenlink.net)

Roger & Richard Neameyer  
33 Slice Drive  
Branson West, MO 65737  
[rsneameyer@hotmail.com](mailto:rsneameyer@hotmail.com)

Robert Bangert  
1304 Stoney Creek Lane  
Reeds Spring, MO 65737

Jack King  
704 Ledges Way  
Branson West, MO 65737  
[jackking@centurytel.net](mailto:jackking@centurytel.net)

William Kennedy  
124 Silver Oak Way  
Branson West, MO 65737  
[wrk8119@gmail.com](mailto:wrk8119@gmail.com)

Roland & Barbara Orle  
605 Stoneykirk  
Reeds Spring, MO 65737  
[rolandbarb55@gmail.com](mailto:rolandbarb55@gmail.com)

Gerard & Carol Gerhart  
923 Silver Bluff Circle  
Branson West, MO 65737

Clifton Dunn  
1207 Ledgeston Circle  
Branson West, MO 65737  
[cddunn@threeddd.com](mailto:cddunn@threeddd.com)

James G. Swinehart  
281 Mountain View CT.  
Branson West MO 65737-9451

Harlan Schmitgen  
106 Cabana Ct.  
Reeds Spring MO 65737  
[hjms@suddenlink.net](mailto:hjms@suddenlink.net)

Larry Tongate  
829 Forest Lake Drive  
Branson West MO 65737  
[ltongate@gmail.com](mailto:ltongate@gmail.com)

Jill Faeth  
1231 West Gregory Blvd.  
Kansas City MO 64114-1125  
[jfaet1@amfam.com](mailto:jfaet1@amfam.com)

Richard & LeaAnn Perkins  
614 Stoneykirk  
Reeds Spring MO 65737-9239

Lon McLauchlin  
204 Silver Oak Lane  
Reeds Spring, Mo 65737

Neil & Susan Smith  
110 Silver Oak Way  
Reeds Spring, MO 65737

Richard Kelly  
111 Silver Way  
Branson West MO 65737  
[msgtkelley@live.com](mailto:msgtkelley@live.com)

Hugh & Jean MacKenzie  
343 Limestone Dr.  
Branson West MO 65737

Don Van Meter  
913 Silver Bluff Circle  
Branson West MO 65737  
[dmeter@aol.com](mailto:dmeter@aol.com)

John W. Graham  
P.O. Box 2183  
70 Cantwell Lane  
Branson West MO 65737-2183  
[scgra1@hotmail.com](mailto:scgra1@hotmail.com)

Robert Zignego  
2804 Pine Ridge Blvd.  
Red Wing MN 55066  
[zignego5193@msn.com](mailto:zignego5193@msn.com)

/s/ Timothy W. Luft