

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

The Staff of the Missouri Public Service Commission,)	
)	
Complainant,)	
v.)	
)	Case No. WC-2022-0295
I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park.)	SC-2022-0296
)	
Respondent.)	

MOTION TO CONSOLIDATE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through counsel, and moves the Commission for an order consolidating WC-2022-0295 and SC-2022-026. Staff states in support of this motion:

1. On April 22, 2022, Staff filed *Staff’s Complaint* concerning the unauthorized provision of water and sewer service by Respondent I-70 Mobile City, Inc., d/b/a I-70 Mobile City Park to the public. These dockets are assigned case numbers WC-2022-0295 and SC-2022-0296.
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. On May 10, 2022, Respondent requested that the Complaint be referred to a neutral third-party mediator for voluntary mediation.
4. Staff filed its response to Respondent’s Request for Mediation on May 16, 2022.
5. There are common questions of law and fact in the above-referenced cases and their consolidation would be administratively expedient and simplify filings.

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

WHEREFORE, Staff requests that the Commission issue an order consolidating Case Nos. WC-2022-0295 and SC-2022-0296, with Case No. WC-2022-0295 being the lead case in which all pleadings are filed.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar Number 45718

Senior Staff Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-5397 (Voice)

573-526-6969 (Fax)

Carolyn.kerr@psc.mo.gov

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 16th day of May, 2022.

/s/ Carolyn H. Kerr