

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

In the Matter of the Application of Seges )  
Partners Mobile Home Park for a Certificate of ) Case No. WA-2008-0403  
Convenience and Necessity to Provide Water )  
Service. )

In the Matter of Seges Partners Mobile Home )  
Park, L.L.C., for a Certificate of Convenience ) Case No. SA-2009-0401  
and Necessity to Own, Operate, Maintain, )  
Control and Manage a Sewer System in )  
Callaway County, Missouri. )

**MOTION TO CONSOLIDATE**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for its Motion to Consolidate, pursuant to Commission Rule 240-2.110(3), states as follows to the Missouri Public Service Commission (Commission):

1. On June 19, 2008, Seges Partners Mobile Home Park, L.L.C. (Seges) filed its Application for Certificate of Convenience and Necessity (CCN) to Provide Water Service to the residents of Seges, in Callaway County, Missouri, assigned case no. WA-2009-0403.
2. On May 11, 2009, Seges filed its Application for CCN regarding its sewer system assigned case no. SA-2009-0401.
3. Staff notes that the area served is the same in both application cases with the majority of customers receiving both water and sewer service within the mobile home park. Both the water and sewer system at issue are managed, billed, and operated by the same entity. Cost of service for the water and sewer system will need to be allocated accordingly to each corporation, water or sewer. Any disputes amongst the parties as to these allocations of time, cost, etc., may affect the other related case, respectively, and therefore require additional filings and rulings in the other related case foreseeably causing delay, cost, and duplication.

4. On April 23, 2009, the Commission ordered, in WA-2008-0403, that a Staff Recommendation or Status Report is due no later than May 25, 2009.

5. On May 11, 2009, the Commission issued its Order and Notice in SA-2009-0401 setting an intervention deadline of May 26, 2009.

6. Staff believes, as most of the investigation has been conducted and completed for both cases, Staff can complete its recommendation for both SA-2009-0401, along with WA-2008-0403 within 30 days. Therefore, if the Commission chooses not to consolidate these two cases, Staff requests the Commission direct Staff to file its recommendation for both SA-2009-0401 and WA-2008-0403 on the same date, as both case recommendations will be contained within one report filed within each case.

**WHEREFORE**, the Staff respectfully requests the Commission consolidate case nos. WA-2008-0403 and SA-2009-0401 as these actions involve related questions of law and fact, and would help avoid unnecessary costs and delay, and Order the Staff to file its combined recommendation 30 days after the effective date of said Commission Order.

Respectfully submitted,  
/s/ Shelley Syler Brueggemann  
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Missouri Bar No. 52173

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 22<sup>nd</sup> day of May 2009.

/s/ Shelley Syler Brueggemann