

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

In the Matter of the Application of Confluence Rivers)	
Utility Operating Company, Inc., for Authority to)	File Nos. WA-2021-0425
Acquire Certain Water and Sewer Assets and for)	SA-2021-0426
Certificates of Convenience and Necessity)	

MOTION TO CONSOLIDATE

COMES NOW Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”), by and through the undersigned counsel, and for its *Motion to Consolidate* states as follows to the Missouri Public Service Commission (“Commission”):

1. On June 25, 2021, Confluence Rivers filed an *Application and Motion for Waiver*, concerning the acquisition of all or substantially all of the water and/or sewer system assets of the currently unregulated systems of The Missing Well, Inc. (water and sewer), Shelton Estates Sewer Company (sewer), Ozark Clean Water Company (used to serve Spring Branch Subdivision) (water), Prairie Heights, L.L.C. (sewer), and Clemstone Sewer District of Platte County (sewer). Confluence Rivers seeks Certificates of Convenience and Necessity (“CCN”) to operate the systems and provide service to the public. Confluence Rivers also seeks to acquire all or substantially all of the water and sewer system assets of Cedar Green Land Acquisition, LLC, which is currently regulated by the Commission. The cases were assigned File Nos. WA-2021-0425 and SA-2021-0426.

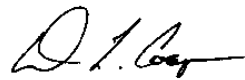
2. The applicant in both cases is Confluence Rivers and two of the entities from whom Confluence Rivers proposes to buy assets, The Missing Well, Inc. and Cedar Green Land Acquisition, LLC, operate both water and sewer systems. The above-captioned cases will thus reference similar parties, contain common questions of law and fact, and will contain primarily

the same filings. Previous cases of this nature have been consolidated for the ease of filings and discovery.

3. The Commission has stated, “Commission Rule 20 CSR 4240-2.110(3) allows for the consolidation of cases with related questions of law or fact.”¹ Therefore, Confluence Rivers requests the Commission consolidate these cases, designating WA-2021-0425 as the lead case.

WHEREFORE, Confluence Rivers Utility Operating Company, Inc., requests a Commission order consolidating Files Nos. WA-2021-0425 and SA-2021-0426, designating File No. WA-2021-0425 as the lead case, and grant such further and other relief as is just and proper in the circumstances.

Respectfully submitted,



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**ATTORNEYS FOR CONFLUENCE RIVERS
UTILITY OPERATING COMPANY, INC.**

¹ Order Consolidating Cases, *In the Matter of Confluence Rivers Utility Operating Company, Inc's Request for a Water Rate Increase*, File No. WR-2020-0043 (October 15, 2019).

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on June 25, 2021, to the following:

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