BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of TUK LLC for Certificates of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain Water and Sewer Systems in Jefferson County, Missouri.)))))	File No. WA-2015-0169
In the Matter of TUK LLC for Certificates of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain Water and Sewer Systems in Jefferson County, Missouri.)))))	File No. SA-2015-0170

MOTION TO CONSOLIDATE

COMES NOW TUK LLC (TUK) and, for its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. On January 20, 2015, and January 21, 2015, TUK filed applications requesting certificates of convenience and necessity for TUK to provide water and sewer services to a portion of Jefferson County, Missouri. The water certificate application was assigned File No. WA-2015-0169, and the sewer certificate application was assigned File No. SA-2015-0170.

2. 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).

3. The above-captioned files concern a single company and identical proposed service areas. The analysis of the applications will involve related questions of law and fact.

4. TUK suggests that consolidation of the two files would further judicial economy and avoid unnecessary costs or delay. For example, taking this step would allow the Commission Staff to prepare and file a single recommendation and memorandum.

WHEREFORE, TUK respectfully requests that the Commission consolidate Files No.

WA-2015-0169 and SA-2015-0170, with WA-2015-0169 being the lead matter.

Respectfully submitted,

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ATTORNEYS FOR TUK LLC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 21st day of January, 2015, to:

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