

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

In the Matter of the Application of)	
Highway H Utilities, Inc. for Authority to Sell)	
Certain Water and Wastewater System Assets to)	
the City of Waynesville, Missouri, and Pulaski)	Files Nos. WM-2018-0094 and
County Sewer District Number 1, and, in)	SM-2018-0095
Connection Therewith, Certain Other Related)	
Transactions.		

MOTION TO CONSOLIDATE

Comes now Highway H Utilities, Inc. (“Highway H” or the “Company”), and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. Highway H filed an Application and request for Waiver with the Commission seeking permission for Highway H to transfer its water assets to the City of Waynesville and its sewer assets to Pulaski County Sewer District Number 1. Two case numbers have resulted from these filings (WM-2018-0094 and SM-2018-0095).

2. The subject water and sewer operations are owned and operated by the same entity (Highway) and the proposed sale of the water and sewer assets is addressed by a single Asset Purchase Agreement.

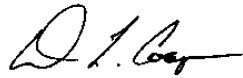
3. Accordingly, there are common questions of law and fact in the above-referenced cases and the consolidation of Files Nos. WM-2018-0094 and SM-2018-0095 would be administratively expedient in that it would simplify the filings to be made by Highway H and the other parties to these matters.

4. Commission Rule “4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact.” Order Consolidating Cases, *In the*

Matter of the Application of Oakview Water and Sewer Company, LLC, Case No. WA-2007-0201 (December 4, 2006).

WHEREFORE, Highway H requests a Commission order consolidating Files Nos. WM-2018-0094 and SM-2018-0095, with File No. WM-2018-0094 being the lead case.

Respectfully submitted,



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**ATTORNEYS FOR HIGHWAY H
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on October 9, 2017, to the following:

Office of the General Counsel
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Office of the Public Counsel
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