BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

)

)

)

In the Matter of the Petition of Missouri-American Water Company for Approval to Change a Water and Sewer Infrastructure Rate Adjustment (WSIRA).

File Nos. <u>WO-2024-0195</u> <u>SO-2024-0196</u>

MOTION TO CONSOLIDATE

COMES NOW Missouri-American Water Company ("MAWC"), by and through the undersigned counsel, and pursuant to 20 CSR 4240-2.110(3) files this *Motion to Consolidate* and states as follows to the Missouri Public Service Commission ("Commission"):

1. On March 1, 2024, MAWC filed a *Petition to Change a Water and Sewer Infrastructure Rate Adjustment (WSIRA)* with the Commission. MAWC seeks to change its WSIRA to provide for the recovery of costs for infrastructure system projects eligible for WSIRA recognition. The Commission assigned Files Nos. WO-2024-0195 and SO-2024-0196 to the *Petition*.

2. MAWC is the applicant in both above-captioned cases. The cases reference the same subject matter, will involve similar parties and will contain common questions of law and fact. Consolidation would promote administrative efficiency for filings and any discovery.

3. Pursuant to Commission Rule 20 CSR 4240-2.110(3), the Commission may issue orders concerning pending cases to avoid unnecessary costs or delays if the actions involve related questions of law or fact. MAWC requests the Commission consolidate the above-captioned cases, designating WO-2024-0195 as the lead case.

WHEREFORE, MAWC requests the Commission issue an order: consolidating File Nos. WO-2024-0195 and SO-2024-0196; designating File No. WO-2024-0195 as the lead case; and

1

granting such further and other relief as is just and proper in the circumstances.

Respectfully submitted,

Q1.6-

Dean L. Cooper Mo. Bar #36592 BRYDON, SWEARENGEN & ENGLAND P.C. 312 East Capitol Avenue P.O. Box 456 Jefferson City, MO 65102-0456 Telephone: (573) 635-7166 Facsimile: (573) 635-0427 dcooper@brydonlaw.com

Timothy W. Luft, MBE #40506 Rachel Niemeier, MBE #56073 Corporate Counsel **MISSOURI-AMERICAN WATER COMPANY** 727 Craig Road St. Louis, MO 63141 (314) 996-2279 (Tim) (314) 996-2390 (Rachel) timothy.luft@amwater.com rachel.neimeier@amwater.com

ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was sent via electronic mail on this 1st day of March 2024 to:

Casi Aslin Staff Counsel's Office <u>casi.aslin@psc.mo.gov</u> <u>staffcounselservice@psc.mo.gov</u> Marc Posten Office of the Public Counsel opcservice@opc.mo.gov

Q1.Com-