

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

In the Matter of the Application of)	
Elm Hills Utility Operating Company, Inc.,)	
and Missouri Utilities Company)	
for Elm Hills to Acquire Certain Water and)	Files Nos. SM-2017-0150 and
Sewer Assets of Missouri Utilities Company,)	WM-2017-0151
For a Certificate of Convenience and Necessity,)	
and, in Connection Therewith, To Issue)	
Indebtedness and Encumber Assets.)	

MOTION TO CONSOLIDATE

Comes now Elm Hills Utility Operating Company, Inc. (“Elm Hills”), and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. Elm Hills and Missouri Utilities Company (“MUC”) have filed a Joint Application with the Commission seeking permission for MUC to transfer its water and sewer assets to Elm Hills. Two case numbers have resulted from these filings (SM-2017-0150 and WM-2017-0151).

2. Both the subject water and sewer matters concern operations owned and operated by MUC and it is proposed that both MUC’s water and sewer assets will be purchased by Elm Hills. The sewer matter additionally concerns a separate request for a certificate of convenience and necessity for an area currently served by State Park Village Sewer, Inc.

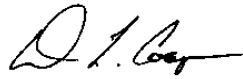
3. There are common questions of law and fact in the above-referenced cases and the consolidation of Files Nos. SM-2017-0150 and WM-2017-0151 would be administratively expedient in that it would simplify the filings to be made by Elm Hills and the other parties to these matters.

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, Elm Hills requests a Commission order consolidating Files Nos. SM-2017-0150 and WM-2017-0151, with File No. SM-2017-0150 being the lead case.

Respectfully submitted,



Dean L. Cooper, MBE #36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65012
(573) 635-7166 telephone
(573) 635-3847 facsimile
dcooper@brydonlaw.com

**ATTORNEYS FOR ELM HILLS UTILITY
OPERATING COMPANY, INC.**

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 December 1, 2016, to the following:

Office of the General Counsel
Governor Office Building
Jefferson City, MO 65101
staffcounsel@psc.mo.gov

Office of the Public Counsel
Governor Office Building
Jefferson City, MO 65101
opc@ded.mo.gov

Gary V. Cover
gary@coverhiltonlaw.com

