

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

In the Matter of the Request of Liberty)
Utilities (Missouri Water) LLC d/b/a)
Liberty for Authority to Implement a) Case Nos. WR-2024-0104
General Rate Increase for Water and) and SR-2024-0105
Wastewater Service Provided in its)
Missouri Service Areas.)

MOTION TO CONSOLIDATE

COMES NOW Liberty Utilities (Missouri Water) LLC d/b/a Liberty (“Liberty”) and for its *Motion to Consolidate* states as follows to the Missouri Public Service Commission ("Commission"):

1. On March 13, 2024, Liberty filed tariff sheets and direct testimony to initiate general rate case proceedings. Liberty seeks an increase in its water and wastewater (sewer) rates and to unify the terms of service and consolidate rates statewide. The cases were assigned Case Nos. WR-2024-0104 and SR-2024-0105.

2. The subject water and wastewater operations are owned and operated by the same entity (Liberty) and have common offices, personnel, and overheads.

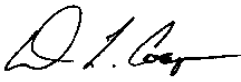
3. Accordingly, there are common questions of law and fact in the above-referenced cases, and consolidation would be administratively expedient in that it would simplify requesting discovery and the filings to be made by Liberty and the parties to these matters. Previous cases of this nature have been consolidated for the ease of filings and discovery. The Commission has stated that Rule 20 CSR 4240-2.110(3) allows the Commission to consolidate cases with related questions of law or fact.¹

¹ *Order Granting Motion to Consolidate*, In the Matter of Confluence Rivers Utility Operating Company, Inc.’s Request for Authority to Implement a General Rate Increase for Water Service and Sewer Service Provided in Missouri Service Areas, Case No. WR-2023-0006 (January 4, 2023).

4. Thus, Liberty requests the Commission consolidate these cases, designating WR-2024-0104 as the lead case.

WHEREFORE, Liberty requests the Commission issue an order consolidating Case Nos. WR-2024-0104 and SR-2024-0105, designating Case No. WR-2024-0104 as the lead case. Liberty requests such further and other relief as is just and proper in the circumstances.

Respectfully Submitted,



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ATTORNEYS FOR LIBERTY UTILITIES (MISSOURI WATER) LLC D/B/A LIBERTY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was sent by electronic mail on this 13th day of March, 2024, to counsel for the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter