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

In the Matter of Liberty Utilities (Missouri)File No.WR-2018-0170Water) LLC's Application for a Rate Increase.)SR-2018-0171

## MOTION TO CONSOLIDATE

Comes now Liberty Utilities (Missouri Water) (Liberty Utilities or Company), and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. Liberty Utilities has filed with the Commission a letter, pursuant to Commission Rule 4 CSR 240-3.050, requesting rate increases for both its water and sewer operations. Two

case numbers have resulted from these filings (WR-2018-0170 and SR-2018-0171).

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

3. Accordingly, there are common questions of law and fact in the above-referenced cases and the consolidation of Cases Nos. WR-2018-0170 and SR-2018-0171 would be administratively expedient in that it would simplify the filings to be made by Liberty Utilities 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, MAWC requests a Commission order consolidating Cases Nos. WR-2018-0170 and SR-2018-0171, with Case No. WR-2018-0170 being the lead case.

Respectfully submitted,

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Dean L. Cooper MBE #36592 BRYDON, SWEARENGEN & ENGLAND P.C. 312 E. Capitol Avenue P. O. Box 456 Jefferson City, MO 65102 Phone: (573) 635-7166 dcooper@brydonlaw.com

ATTORNEYS FOR LIBERTY UTILITIES (MISSOURI WATER) LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was sent via electronic mail on this 13<sup>th</sup> day of January, 2018, to:

Office of the General Counsel Governor Office Building Jefferson City, MO 65101 <u>staffcounselservice@psc.mo.gov</u> <u>casi.aslin@psc.mo.gov</u> Office of the Public Counsel Governor Office Building Jefferson City, MO 65101 opcservice@ded.mo.gov

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