

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

In the Matter of the Petition of)	
Missouri-American Water Company for)	File Nos. <u>WO-2022-0176</u>
Approval to Change a Water and Sewer)	<u>SO-2022-0177</u>
Infrastructure Rate Adjustment ("WSIRA"))	

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 4, 2022, MAWC filed a *Petition to Change a Water and Sewer Infrastructure Rate Adjustment ("WSIRA")* ("*Petition*") 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 File Nos. WO-2022-0176 and SO-2022-0177 to the *Petition*.

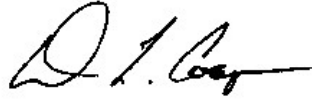
2. MAWC is the applicant in both above-captioned cases. The cases reference the same subject matter, will involve similar parties and will contain common questions of law and fact. Consolidation would promote administrative efficiency for filings and any discovery.

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-2022-0176 as the lead case.

WHEREFORE, MAWC requests the Commission issue an order: consolidating File Nos. WO-2022-0176 and SO-2022-0177; designating File No. WO-2022-0176 as the lead case; directing the parties to designate if a filing or the content of a filing pertains to a specific system; and granting

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

Respectfully submitted,



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, Mo. Bar #40506
Corporate Counsel
MISSOURI-AMERICAN WATER COMPANY
727 Craig Road
St. Louis, MO 63141
(314) 996-2279 telephone
(314) 997-2451 facsimile
timothy.luft@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 4th day of March 2022 to:

Karen Bretz
Staff Counsel's Office
karen.bretz@psc.mo.gov
staffcounsel@psc.mo.gov

Marc Posten
Office of the Public Counsel
opcservice@opc.mo.gov

