

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

In the Matter of Lincoln County Sewer & Water, LLC for a Certificate of Convenience and Necessity Authorizing it to Own, Operate, Maintain, Control and Manage Water Systems in Lincoln County, Missouri. )  
)  
)  
) File No. WA-2012-0018  
)  
)

In the Matter of Lincoln County Sewer & Water, LLC for a Certificate of Convenience and Necessity Authorizing it to Own, Operate, Maintain, Control and Manage Sewer Systems in Lincoln County, Missouri. )  
)  
)  
) File No. SA-2012-0019  
)  
)

**MOTION TO CONSOLIDATE**

**COMES NOW** Lincoln County Sewer & Water, LLC. (LCSW) and states the following to the Missouri Public Service Commission (Commission) as its Motion to Consolidate:

1. On July 19, 2011, LCSW filed applications requesting certificates of convenience and necessity for LCSW to provide water and sewer services to portions of Lincoln County, Missouri. The water certificate application was assigned File No. WA-2012-0018 and the sewer certificate application was assigned File No. SA-2012-0019.

2. Commission Rule 4 CSR 240-2.110(3) states that “[w]hen pending actions involve related questions of law or fact, the commission may order a joint hearing of any or all the matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay.” The Commission has previously stated that Commission Rule 4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of

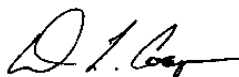
law or fact. *See In the Matter of Highway H Utilities, Inc.*, Order Consolidating Cases, Case No. WA-2009-0316, 2009 Mo. PSC LEXIS 431 (May 19, 2009).

3. The above-captioned files concern a single company and identical proposed service areas. The analysis of the applications will involve related questions of law and fact.

4. LCSW suggests that consolidation of the two files would further judicial economy and avoid unnecessary costs or delay. For example, taking this step would allow the Commission Staff to prepare and file a single recommendation and memorandum.

WHEREFORE, LCSW respectfully requests that the Commission consolidate Files No. WA-2012-0018 and SA-2012-0019, with WA-2012-0018 being the lead matter.

Respectfully submitted,



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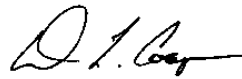
ATTORNEYS FOR LINCOLN COUNTY  
SEWER & WATER, LLC

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 3<sup>rd</sup> day of August, 2011, to:

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