

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

In the Matter of the Petition of	)	
Missouri-American Water Company for	)	File No. <u>WR-2026-0160</u>
Approval to Change a Water and Sewer	)	File No. <u>SR-2026-1061</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 3, 2026, MAWC filed a *Petition to Change a Water and Sewer Infrastructure Rate Adjustment (Petition)* with the Commission. MAWC seeks to change its water WSIRA and sewer WSIRA to provide for the recovery of costs for infrastructure system projects eligible for WSIRA recognition. This *Petition* was submitted in Files Nos. WR-2026-0160 and SR-2026-0161.

2. MAWC is the applicant in both above-referenced files. The files 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 matters, designating WR-2026-0160 as the lead case.

**WHEREFORE**, MAWC requests the Commission issue an order: consolidating File Nos. WR-2026-0160 and SR-2026-0161; designating File No. WR-2026-0160 as the lead case; 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  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

Timothy W. Luft, MBE #40506  
Rachel Niemeier, MBE #56073  
Corporate Counsel  
**MISSOURI-AMERICAN WATER COMPANY**  
727 Craig Road  
St. Louis, MO 63141  
(314) 996-2279 (Tim)  
(314) 996-2390 (Rachel)  
[timothy.luft@amwater.com](mailto:timothy.luft@amwater.com)  
[rachel.neimeier@amwater.com](mailto:rachel.neimeier@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 3<sup>rd</sup> day of March 2026 to:

Casi Aslin  
Staff Counsel's Office  
[casi.aslin@psc.mo.gov](mailto:casi.aslin@psc.mo.gov)  
[staffcounsellservice@psc.mo.gov](mailto:staffcounsellservice@psc.mo.gov)

Marc Posten  
Office of the Public Counsel  
[opcservice@opc.mo.gov](mailto:opcservice@opc.mo.gov)

