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

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In the Matter of the Application of Foxfire Utility Company for Authority to Transfer Certain Water and Sewer Assets Located in Stone County, Missouri to Ozark Clean Water Company, and in Connection Therewith, Certain Other Related Transactions.

File Nos.

WM-2022-0186 SM-2022-0187

## MOTION TO CONSOLIDATE

*COMES NOW* Foxfire Utility Company ("Foxfire"), and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. Foxfire has filed an Application with the Commission for approval of the sale of its water and sewer assets to Ozark Clean Water Company. Two case numbers have resulted from these filings (WM-2022-0186 and SM-2022-0187).

2. Both the subject water and sewer matters concern operations owned and operated by Foxfire. There are common questions of law and fact in the above-referenced cases and the consolidation of Files Nos. WM-2022-0186 and SM-2022-0187 would be administratively expedient in that it would simplify the filings to be made by Foxfire and the other parties to these matters.

3. Commission Rule "4 CSR 240-2.110(3)<sup>1</sup> 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, Foxfire requests a Commission order consolidating Files Nos. WM-2022-0186 and SM-2022-0187, with File No. WM-2022-0186 being the lead case.

<sup>&</sup>lt;sup>1</sup> Now 20 CSR 4240-2.110(3).

Respectfully submitted,

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ATTORNEYS FOR FOXFIRE UTILITY COMPANY

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following this 15<sup>th</sup> day of March, 2022:

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