

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

In the Matter of the Application of Liberty     )  
Utilities (Missouri Water) LLC for an         ) Case No. WE-2026-0067  
Order Granting Temporary Billing             )  
Variances                                             )

In the Matter of the Application of Liberty     )  
Utilities (Missouri Water) LLC for an         ) Case No. SE-2027-0045  
Order Granting Permanent Billing             )  
Variances.                                             )

**MOTION TO CONSOLIDATE**

**COMES NOW** Liberty Utilities (Missouri Water) LLC d/b/a Liberty (“Liberty”) and for its *Motion to Consolidate* states as follows to Missouri Public Service Commission ("Commission"):

1. On June 24, 2026, The Empire District Electric Company, The Empire District Gas Company, Liberty Utilities (Missouri Water) LLC, and Liberty Utilities (Midstates Natural Gas) Corp. (“Midstates”) previously filed applications for temporary and permanent variances. The cases were assigned Case Nos. EE-2026-0065, GE-2026-0066, and WE-2026-0067.

2. On August 10, 2026, Libert Utilities (Missouri Water LLC) filed a separate sewer case, identified as Case No. SE-2027-0045.

3. The subject water and sewer operations are owned and operated by the same entity (Liberty Utilities (Missouri Water) LLC). The applications for permanent variance pending in Case No. WE-2026-0067 and Case No. SE-2027-0045 are substantively identical. Further the Commission has previously ordered in both cases that Staff file a recommendation, or an alternative pleading, no later than August 31, 2026. Accordingly, there are common questions of law and fact in the above-referenced cases and Consolidation would promote administrative efficiency.

4. Previous cases concerning water and sewer operations of the same public utility have been consolidated for the ease of filings and discovery. The Commission has stated that Rule 20 CSR 4240-2.110(3) allows the Commission to consolidate cases with related questions of law or fact.<sup>1</sup> Thus, Liberty requests the Commission consolidate these cases, designating WE-2026-0067 as the lead case.

**WHEREFORE**, Liberty requests the Commission issue an order consolidating Case Nos. WE-2026-0067 and SE-2027-0045, designating Case No. WE-2026-0067 as the lead case, and grant such further and other relief as is just and proper in the circumstances.

Respectfully Submitted,

//S// Dean L. Cooper  
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**ATTORNEYS FOR LIBERTY UTILITIES  
(MISSOURI WATER) LLC D/B/A LIBERTY**

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing document was sent by electronic mail on this 28<sup>th</sup> day of August 2026 to:

Staff Counsel's Office  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

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

//S Dean L. Cooper

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<sup>1</sup> Order Granting Motion to Consolidate, *In the Matter of Confluence Rivers Utility Operating Company, Inc's Request for Authority to Implement a General Rate Increase for Water Service and Sewer Service Provided in Missouri Service Areas*, File No. WR-2023-0006 (January 4, 2023).