

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

The Office of the Public Counsel,	)	
COMPLAINANT	)	
	)	
v.	)	<b>Case No. SC-2014-0137</b>
	)	
Missouri-American Water Company,	)	
RESPONDENT	)	

The Office of the Public Counsel,	)	
COMPLAINANT	)	
	)	
v.	)	<b>Case No. WC-2014-0138</b>
	)	
Missouri-American Water Company,	)	
RESPONDENT	)	

**THE OFFICE OF THE PUBLIC COUNSEL’S RESPONSE**  
**TO MOTION TO CONSOLIDATE**

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Response to Motion to Consolidate, states as follows:

1. After reviewing numerous formal customer complaints recently filed with the Missouri Public Service Commission (Commission), Public Counsel filed the above stated complaints alleging the current billing practices of Missouri American Water Company (MAWC) for water and sewer rates and charges are unjust and unreasonable in that numerous customers are being subjected to incorrect and grossly inflated bills for water and sewer service in violation of the rates or charges allowed and authorized by the Commission.

2. On November 15, 2013, MAWC requested that the Commission consolidate Cases Nos. WC-2014-0098, WC-2014-0099, WC-2014-0100, WC-2014-0114, WC-2014-0115, WC-2014-0127, WC-2014-0129, WC-2014-0132, WC-2014-0134, WC-2014-0135, SC-2014-0137, and WC-2014-0138, with WC-2014-0138 being the lead matter, and issue an order directing that MAWC's answer in the consolidated matter be due on December 13, 2013.

3. Public Counsel now states that due to the related questions of law and fact it has no objection to the consolidation of its complaints, SC-2014-0137 and WC-2014-0138, with WC-2014-0138 designated as the lead matter. Additionally, Public Counsel has no objection to MAWC's request that the answer in the consolidated matter be due on December 13, 2013.

4. Public Counsel also states that while it has no objection to the consolidation of the various formal customer complaints under WC-2014-0138, Public Counsel believes the decision to consolidate should lie solely with the customer who filed the formal complaint. Each formal complaint involves specific issues, facts and resolutions that may not be addressed to the customer's satisfaction within a consolidated complaint on MAWC's billing practices. Therefore, if the customer who filed an individual formal complaint does not object to having their complaint consolidated under WC-2014-0138, Public Counsel also has no objection.

**WHEREFORE**, Public Counsel respectfully submits its Response.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

**/s/ Christina L. Baker**

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 21<sup>st</sup> day of November, 2013:

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**/s/ Christina L. Baker**

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