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

)

)

)

)

)

)

In the Matter of Missouri-American Water Company for Certificates of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain Water and Sewer Systems in and around the City of Lawson, Missouri.

) File No. WA-2018-0222 SA-2018-0223

## MOTION TO CONSOLIDATE

COMES NOW Missouri-American Water Company (MAWC) and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. MAWC has filed an Application with the Commission for certificates of convenience and necessity associated with its possible purchase of the City of Lawson water and sewer assets. Two case numbers have resulted from these filings (WA-2018-0222 and

SA-2018-0223).

2. Both the subject water and sewer matters concern operations owned and operated by the City of Lawson. There are common questions of law and fact in the above-referenced cases and the consolidation of Files Nos. WA-2018-0222 and SA-2018-0223 would be administratively expedient in that it would simplify the filings to be made by MAWC and the other parties to these matters.

Commission Rule "4 CSR 240-2.110(3) allows the Commission to consolidate 3. 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).

4. Counsel for MAWC has contacted Commission Staff with regard to the

proposed consolidation and Commission Staff has consented to same.

WHEREFORE, MAWC requests a Commission order consolidating Files Nos.

WA-2018-0222 and SA-2018-0223, with File No. WA-2018-0222 being the lead case.

Respectfully submitted,

1. Com

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 Facsimile: (573) 635-0427 dcooper@brydonlaw.com

Timothy W. Luft, MBE #40506 Corporate Counsel **MISSOURI-AMERICAN WATER COMPANY** 727 Craig Road St. Louis, MO 63141 (314) 996-2279 telephone (314) 997-2451 facsimile timothy.luft@amwater.com

ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 2nd day of March, 2018, to:

General Counsel's Office staffcounselservice@psc.mo.gov Office of the Public Counsel opcservice@ded.mo.gov

Q1.Com