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

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

File Nos. WA-2022-0293 SA-2022-0294

## MOTION TO CONSOLIDATE

**COMES NOW** Missouri-American Water Company ("MAWC"), by and through the undersigned counsel, and for its *Motion to Consolidate* states as follows to the Missouri Public Service Commission ("Commission"):

1. On April 21, 2022, MAWC filed an *Application, Motion for Waiver And Motion For Expedited Treatment ("Application")* requesting permission and approval for a certificate of convenience and necessity to install, own, acquire, construct, operate, control, manage, and maintain a water system and sewer system in and around the City of Purcell, Missouri. The cases were assigned File Nos. WA-2022-0293 and SA-2022-0294.

2. In both cases MAWC is the applicant and the subject water and sewer matters concern systems owned by the City of Purcell. There are common questions of law and fact in Files Nos. WA-2022-0293 and SA-2022-0294 and consolidation of the referenced cases would aid in administrative efficiency. Consolidation would simplify requesting discovery and the filings to be made by the parties to these matters.

3. Previous cases of this nature have been consolidated for the ease of filings and discovery. Commission Rule 20 CSR 4240-2.110 (3) allows the Commission to consolidate pending actions involving related questions of law or fact. Thus, MAWC requests the Commission

consolidate these cases, designating WA-2022-0293 as the lead case.

WHEREFORE, MAWC requests the Commission issue an order consolidating Files Nos.

WA-2022-0293 and SA-2022-0294, designating File No. WA-2022-0293 as the lead case, and grant such further and other relief as is just and proper in the circumstances.

Respectfully submitted,

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## 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 21<sup>st</sup> day of April 2022, to all counsel of record.

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