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AZ CORP COMMISSION
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Arizona Corporation Commission
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BEFORE THE ARIZONA CORPORATION COMMISSION

6 IN THE MATTER OF THE APPLICATION)
7 OF SUNRISE UTILITIES, L.L.C. FOR A) DOCKET NO. WS-04247A-04-0604
8 CERTIFICATE OF CONVENIENCE AND)
9 NECESSITY TO PROVIDE WATER AND)
10 WASTEWATER SERVICE IN MOHAVE)
11 COUNTY, ARIZONA.)
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MOTION TO CONSOLIDATE

11 Sunrise Utilities, L.L.C., ("Sunrise" or the "Company"), pursuant to A.R.C.P. 42(a) and
12 A.A.C. R14-3-109(H), hereby files this Motion to Consolidate the subject Docket with Docket
13 No. W-03067A-04-0216 for the reasons stated herein.

14
15 1. On March 23, 2004, the Company filed an Application in Docket No. WS-04247A-
16 04-0217 requesting a Certificate of Convenience and Necessity ("CC&N") for certain areas in
17 Mohave County, Arizona, including a small portion of the area presently certificated to Beaver
18 Dam Water ("Beaver Dam") Company.

19 2. On that same day Beaver Dam filed an Application for Deletion of that same small
20 portion of its CC&N that was adjacent to the other Sunrise requested area.

21 3. On June 30, 2004 Staff requested Administrative Closure of Docket 04-0217 as
22 Insufficient, and on July 16 the Sunrise Application was Administratively Closed under Decision
23 No. 67122.

1 4. On July 2, 2004 a Procedural Order was issued in Docket 04-0216 stating, among
2 other things, that the Beaver Dam Application would "...proceed on its own merits".

3 5. On August 16, 2004 Sunrise filed a new Application in the subject Docket for the
4 same area as in Docket 04-0217. The Staff Report in that matter was issued on March 29, 2004
5 and that matter has been set for hearing on April 26, 2004.

6 6. The Staff Report recommended, among other things, approval of certain portions
7 of the requested area, but recommended denial of the area within the Beaver Dam CC&N.

8 7. Sunrise and Beaver Dam are still of the opinion that the deletion of that area from
9 the Beaver Dam CC&N and inclusion in the Sunrise CC&N are in the public interest, and
10 therefore are of the further opinion that these issues should be considered by the Commission in
11 a consolidated hearing on both Dockets.

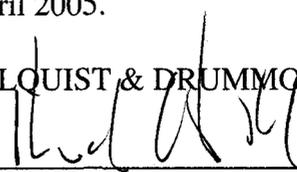
12 8. The Company is of the opinion that both Applications will consider related law
13 and facts, have the same witnesses, and are so inter-related that these matters should be
14 consolidated for hearing and consideration.

15 9. Beaver Dam has simultaneously filed a Motion to Consolidate these matters.

16 WHEREFORE, Sunrise Utilities, L.L.C. respectfully requests that the Administrative
17 Law Judge consolidate these matters for purposes of hearing and consideration and issue a
18 Procedural Order to that effect.

19 RESPECTFULLY submitted this 20th day of April 2005.

20 SALLQUIST & DRUMMOND, P.C.

21 By: 
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Original and fifteen copies of the foregoing filed this 20th day of April, 2005:

Docket Control
Arizona Corporation Commission
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Phoenix, Arizona 85007

Copies of the foregoing was hand-delivered/mailed this 20th day of April, 2005:

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Beaver Dam Water Company

