



0000050996

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

RECEIVED

JEFF HATCH-MILLER, Chairman
WILLIAM A. MUNDELL
MARC SPITZER
MIKE GLEASON
KRISTIN K. MAYES

2006 JUN -7 P 2:37
AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF ARIZONA WATER COMPANY FOR AN EXTENSION TO ITS EXISTING CERTIFICATE OF CONVENIENCE AND NECESSITY.

DOCKET NO. W-01445A-06-0199

IN THE MATTER OF THE APPLICATION OF PALO VERDE UTILITIES COMPANY FOR AN EXTENSION OF ITS EXISTING CERTIFICATE OF CONVENIENCE AND NECESSITY.

DOCKET NO. SW-03575A-05-0926

IN THE MATTER OF THE APPLICATION OF SANTA CRUZ WATER COMPANY FOR AN EXTENSION OF ITS CERTIFICATE OF ITS EXISTING CERTIFICATE OF CONVENIENCE AND NECESSITY.

DOCKET NO. W-03576A-05-0926

STAFF'S OBJECTION TO MOTION TO INTERVENE

On May 18, 2006, Staff received the Motion to Intervene from Ridgeview Utility Company, Picacho Water Company, Lago Del Oro Water Company, and Santa Rosa Water Company (collectively, the "Robson Utilities") in the above-captioned dockets.

Staff objects to the Motion to Intervene filed by Robson Utilities. A.A.C. R14-3-105.B provides, in pertinent part, that "(n)o application to intervene shall be granted where by doing so the issues theretofore presented will be unduly broadened, except upon leave of the Commission first had and received." Robson Utilities have not applied for an extension into the area that is the subject of the above-captioned dockets. Robson Utilities do not have any requests for service in the extension area. Robson Utilities is attempting to unduly broaden this proceeding into a comparison between itself and competing providers. In this particular case, Arizona Water Company, Palo Verde Utilities Company and Santa Cruz Water Company are the only providers that have requested an extension. Therefore, Staff respectfully requests that the Motion to Intervene be denied.

...

1 RESPECTFULLY SUBMITTED this 7th day of June 2006.

2
3 *David M. Ronald*

4 David M. Ronald
5 Attorney, Legal Division
6 Arizona Corporation Commission
7 1200 West Washington Street
8 Phoenix, Arizona 85007
9 (602) 542-3402

10 Original and thirteen (13) copies
11 of the foregoing were filed this
12 7th day of June 2006 with:

13 Docket Control
14 Arizona Corporation Commission
15 1200 West Washington Street
16 Phoenix, Arizona 85007

17 Copy of the foregoing mailed this
18 7th day of June 2006 to:

19 Robert W. Geake
20 ARIZONA WATER COMPANY
21 P.O Box 29006
22 Phoenix, Arizona 85038

23 Steve A. Hirsch
24 Rodney W. Ott
25 BRYAN CAVE
26 Two North Central Avenue, Suite 2200
27 Phoenix, Arizona 85004

28 Michael W. Patten
ROSHKA, DeWULF & PATTEN
400 East Van Buren, Suite 800
Phoenix, Arizona 85004
Attorney for Palo Verde Utilities and Santa Cruz Water Company

Brad Clough
ANDERSON & BARNES 580, LLP
ANDERSON & MILLER 694, LLP
8501 N. Scottsdale Road, Suite 260
Scottsdale, Arizona 85253

Jeffery W. Crockett
Marcie Montgomery
SNELL & WILMER 400 East Van Buren Street
Phoenix, Arizona 85004
Attorney for CHI Construction Company and
CP Water Company

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Kenneth H. Lowman
KEJE Group, LLC
7854 West Sahara
Las Vegas, NV 89117

Craig Emmerson
ANDERSON & VAL VISTA 6, LLC
8501 North Scottsdale Road, Suite 260
Scottsdale, Arizona 85253

