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INTERVENTION

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AZ CORP COMMISSION
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2 Sallquist & Drummond, P.C.
2525 East Arizona Biltmore Circle
Suite 117
3 Phoenix, Arizona 85016-2129
(602) 224-9222
4 Attorneys for Sonoran Utility Services, L.L.C.

BEFORE THE ARIZONA CORPORATION COMMISSION

6 IN THE MATTER OF THE APPLICATION) DOCKET NO. SW-03575A-03-0167
OF PALO VERDE UTILITIES COMPANY)
7 FOR AN EXTENSION OF ITS EXISTING)
CERTIFICATE OF CONVENIENCE AND)
8 NECESSITY.)

9 IN THE MATTER OF THE APPLICATION) DOCKET NO. W-03576A-03-0167
OF SANTA CRUZ WATER COMPANY FOR)
10 AN EXTENSION OF ITS EXISTING) MOTION FOR LEAVE TO
CERTIFICATE OF CONVENIENCE AND) INTERVENE
11 NECESSITY.)

12 Sonoran Utility Services, L.L.C. ("Sonoran") on behalf of 387 Domestic Water
13 Improvement District and 387 Wastewater Improvement District (collectively referred to as the
14 "Districts") by and through their undersigned counsel, hereby moves the Commission pursuant to
15 Arizona Rules of Civil Procedure, Commission Rule A.A.C. R14-3-105 and the Commission's
16 Procedural Order dated May 28, 2003, for leave to intervene in the captioned proceeding for the
17 reasons set forth in the attached Memorandum of Points and Authorities.

18 Respectfully submitted this ^{17th} day of July, 2003

SALLQUIST & DRUMMOND, P.C.

Arizona Corporation Commission

DOCKETED

JUL 14 2003

DOCKETED BY []

By [Signature]
Richard L. Sallquist
2525 East Arizona Biltmore Circle, Suite 117
Phoenix, Arizona 85016
Attorney for Sonoran Utility Services, L.L.C.

1 Memorandum of Points and Authorities

2 1. 387 Domestic Water Improvement District and 387 Wastewater Improvement District
3 are Arizona municipal corporations duly formed under the laws of Arizona as county
4 improvement districts. Both Districts were formed on May 21, 2003.

5 2. The Districts have contracted with Sonoran to manage the organization and operation
6 of the Districts' business within their authorized boundaries under Management Services
7 Agreements between the Districts and Sonoran as approved by the Districts on June 25, 2003.

8 3. The Wastewater Improvement Districts has received approval of amendments to its
9 "CAAG 208" plan pursuant to which it will provide wastewater utility service to property
10 included in the Applicant's requested area. The Districts have also received requests from
11 property owners within that extended 208 area to provide water and wastewater service. Those
12 properties are adjacent to the Districts' existing boundaries and will be annexed into the Districts
13 upon completion of those formalities.

14 4. Sonoran's (and the Districts') interests are directly and substantially affected by these
15 proceedings. Those interests in this matter are not represented by any other party or intervener in
16 this proceeding. The requested intervention will not unduly broaden the issues heretofore
17 presented, except on leave of the Commission first had and received.

18 WHEREFORE, in view of the foregoing, Sonoran respectfully requests that the
19 Commission grant Sonoran's request for leave to intervene in the instant proceeding, and that
20 Sonoran be accorded the full status of an intervener under the Commission's Rules and
21 Regulations.

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Respectfully submitted this 12th day of July, 2003.

SALLQUIST & DRUMMOND, P.C.

By 
Richard L. Sallquist
2525 East Arizona Biltmore Circle, Suite 117
Phoenix, Arizona 85016
Attorney for Sonoran Utility Services, L.L.C.

Original and 15 copies of the foregoing filed this 14th day of July, 2003, with:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Copies of the foregoing filed this 14th day of July, 2003, to:

Dwight Nodes
Administrative Law Judge
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Jay Shapiro
Fennemore Craig
3003 N. Central Ave., Suite 2600
Phoenix, Arizona 85012

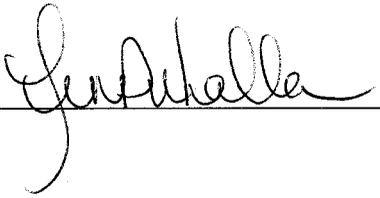
Brent D. Butcher
3975 S. Highland Drive, #6
Salt Lake City, Utah 84124

Kent A. Hogan
3799 E. Catamount Ridge Way
Sandy, Utah 84092

1 Christopher Kemply, Chief Counsel
Legal Division

2 Arizona Corporation Commission
1200 West Washington
3 Phoenix, Arizona 85007

4 Ernest Johnson, Director
Utilities Division
5 Arizona Corporation Commission
1200 West Washington
6 Phoenix, Arizona 85007

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