



BEFORE THE ARIZONA CORPORATION COMMISSION

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**COMMISSIONERS**

Jeff Hatch-Miller, Chairman  
William A. Mundell  
Mike Gleason  
Kristin K. Mayes  
Barry Wong

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AZ CORP COMMISSION  
DOCUMENT CONTROL

Arizona Corporation Commission

**DOCKETED**

OCT -3 2006

DOCKETED BY	
<i>JK</i>	<i>NR</i>

IN THE MATTER OF THE APPLICATION OF ARIZONA WATER COMPANY, AN ARIZONA CORPORATION, TO EXEND ITS EXISTING CERTIFICATE OF CONVENIENCE AND NECESSITY IN THE CITY OF CASA GRANDE AND IN PINAL COUNTY, ARIZONA

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 EXISTING CERTIFICATE OF CONVENIENCE AND NECESSITY.

Docket No. W-03576A-05-0926

**GLOBAL'S RESPONSE TO STAFF'S**

**MOTION FOR AN EXTENSION**

Santa Cruz Water Company, LLC; Palo Verde Utilities Company, LLC; Global Water – Santa Cruz Water Company and Global Water – Palo Verde Utilities Company (collectively, “Global”) respond in opposition to Staff’s Motion for an Extension. Staff requests an extraordinary, unlimited continuance in this case. There is no basis for such an extension, and it should be denied.

Staff’s stated rationale is that the filing of its recommendation in this case may “prejudice one or more of the parties in settlement negotiations” because Staff’s position would be known

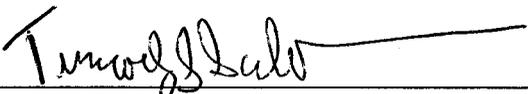
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after they file their direct testimony. This rationale is odd in several respects. First, if anything, knowledge of Staff's position may act as a factor to encourage settlement. Second, Staff has indicated they will not participate in any further settlement talks. If the settlement talks do not involve Staff, why should the case be delayed while other parties engage in those talks? Third, granting an indefinite extension would remove any sense of urgency from the settlement talks – without deadlines, the talks may drag on for an extended period. Fourth, Global's customers in the development community have been waiting for a long time for this case to proceed. Global has valid requests for service from all of the landowners in its requested extension area. These requests expressly seek service from Global. Even under the current schedule, this case will extend well past a year from when Global made its intial application. Such delay would be prejudicial to both Global and the landowners. Further delay is not warranted. Accordingly, Staff's motion should be denied, and the current procedural should be preserved.

RESPECTFULLY SUBMITTED this 3<sup>RD</sup> day of October 2006.

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1 Original + 17 copies of the foregoing  
2 filed this 3<sup>RD</sup> day of October 2006, with:

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7 Copies of the foregoing hand-delivered/mailed  
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