

ORIGINAL INTERVENTION



BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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JAN 05 2007

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COMMISSIONERS

JEFF HATCH-MILLER – Chairman
WILLIAM A. MUNDELL
MIKE GLEASON
KRISTIN K. MAYES
GARY PIERCE

2007 JAN -5 P 4: 36
AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION
OF JOHNSON UTILITIES, L.L.C., FOR AN
EXTENSION OF ITS CERTIFICATE OF
CONVENIENCE AND NECESSITY

DOCKET NO. WS-02987A-06-0663

MOTION TO INTERVENE

LeSueur Investments VIII, L.L.C., Landmark Property Holdings, LLC, Skyview OIO, LLC, Grant and Fern Ellsworth as trustees of the Ellsworth Revocable Living Trust dated May 22, 1984, MDM Farms, L.L.C., and Casa Grande Camp Farm L.L.C. (collectively the “Petitioners”) hereby move the Arizona Corporation Commission (“Commission”) for leave to intervene in the above-captioned proceeding pursuant to A.A.C. R14-3-105 and the Procedural Order issued December 8, 2006, in this docket. This motion is supported by the following facts and information:

1. On October 16, 2006, Johnson Utilities, L.L.C., (“Johnson Utilities”) filed an application (“Application”) with the Commission seeking approval to extend its Certificate of Convenience and Necessity within Pinal County, Arizona (the “Extension Area”).

2. In a Procedural Order dated December 8, 2006, the Commission’s Administrative Law Judge set a hearing for January 29, 2007, and a deadline for motions to intervene of January 8, 2007.

3. The Extension Area is comprised of approximately 1,863 acres owned by the Petitioners on Arizona Farms Road approximately two miles west of Highway 79 and known as Skyview Farms. As landowners, Petitioners are directly and substantially affected by these proceedings.

4. The granting of intervenor status to the Petitioners will not delay this proceeding or cause the issues to be unduly broadened.

Snell & Wilmer

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5. The name, address, telephone number, facsimile number and e-mail address of the attorneys for the Petitioners, upon whom service of all documents is to be made are:

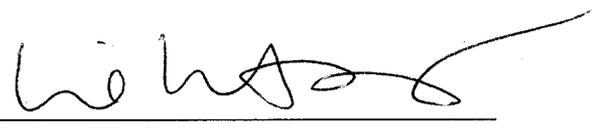
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5. A copy of this Motion to Intervene has been sent via first class mail to the attorneys for Johnson Utilities at the address below.

WHEREFORE, the Petitioners respectfully request that the Commission grant their Motion to Intervene.

DATED this 5th day of January, 2007.

SNELL & WILMER



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Attorneys for LeSueur Investments VIII, L.L.C., Landmark Property Holdings, LLC, Skyview OIO, LLC, Grant and Fern Ellsworth as trustees of the Ellsworth Revocable Living Trust dated May 22, 1984, MDM Farms, L.L.C., and Casa Grande Camp Farm L.L.C.

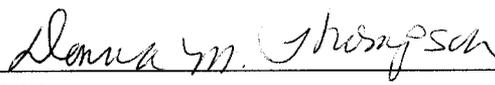
ORIGINAL and thirteen (13) copies filed with Docket Control this 5th day of January, 2007.

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COPY of the foregoing mailed this
5th day of January, 2007, to:

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