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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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Arizona Corporation Commission
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JUL 17 2007

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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-07-0300

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-07-0300

**MOTION TO CONSOLIDATE
PROCEEDINGS**

Arizona Water Company, an Arizona corporation ("AWC") pursuant to Rule 42(a) of the Arizona Rules of Civil Procedure and A.A.C. R14-3-109.H of the Arizona Corporation Commission's Rules of Practice and Procedure, hereby moves the Arizona Corporation Commission (the "Commission") to consolidate the above-captioned dockets with Docket Nos. W-01445A-06-0199, SW-03575A-05-0926, and W-03576A-05-0926 (the "Consolidated Dockets"). This Motion is based upon the following:

AWC already has pending in the Consolidated Dockets an application for a Certificate of Convenience and Necessity ("CC&N") for authority to provide water service to the same area as the CC&N area that Santa Cruz Water Company ("Santa Cruz") is now requesting in Docket No. W-03576A-07-0300 (the "New Docket"). AWC's application to intervene in the New Docket was approved by a procedural order entered on June 26, 2007.

1 The two applications involve common questions of law and fact, are appropriate
2 to consolidate, and should be considered together. These proceedings need to be
3 consolidated to allow the Commission to consider the compelling public policy issues
4 that favor AWC's CC&N Application in the Consolidated Dockets, such as:

5 a. AWC has longstanding plans to extend water service to the expansion area
6 and, as a result of such planning and the existence of its adjacent water
7 systems in Stanfield, Casa Grande and Coolidge, AWC can offer more
8 reliable water service, lower cost of water facilities, and lower water rates
9 than Santa Cruz.

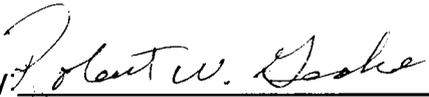
10 b. AWC is already constructing the interconnection of its Casa Grande and
11 Coolidge water systems, and is well underway on planning the
12 engineering and design for construction of a required water treatment
13 plant to treat its combined Casa Grande and Coolidge Central Arizona
14 Project water allocations and thereby supplement its required water
15 supplies. AWC's planned construction of a water treatment plant has
16 been supported by the Mayors and City Councils of Casa Grande and
17 Coolidge.

18 In addition, A.A.C. R14-3-109.H provides that "...the presiding officer may
19 consolidate two or more proceedings in one hearing when it appears that the issues are
20 substantially the same and that the rights of the parties will not be prejudiced by such
21 procedure..." That is precisely the case in the Consolidated Dockets and the New
22 Docket. The rights of Santa Cruz, AWC, the Commission Staff, and the intervenors
23 would not be prejudiced by the requested consolidation. Hearings have been stayed
24 indefinitely in the Consolidated Dockets and no hearings have been scheduled in the
25 New Docket. No party to this proceeding can, with any justification, claim unfair
26 surprise, or that the consolidation of these proceedings and any subsequent hearing(s)
27 would be unduly burdensome. In fact, if these matters are not consolidated and heard
28 together, the Commission will be required to hold multiple hearings to hear much of the

1 same evidence. It would be a needless duplication of effort and an inefficient use of the
2 Commission's and the parties' resources if multiple analyses and hearings were
3 required.

4 Based upon the foregoing, AWC respectfully requests that the above-captioned
5 matters be consolidated and that the hearings on both applications be combined for one
6 hearing.

7 RESPECTFULLY SUBMITTED this 17th day of July, 2007.

8 ARIZONA WATER COMPANY
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1 **ORIGINAL** and 17 **COPIES** of the foregoing filed this 17th day of July, 2007 with:

2 Docket Control Division
3 Arizona Corporation Commission
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6 **COPY** of the foregoing was hand-delivered this 17th day of July, 2007 to:

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