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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
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IN THE MATTER OF THE APPLICATION OF ARIZONA WATER COMPANY, FOR AN EXTENSION OF ITS EXISTING CERTIFICATE OF CONVENIENCE AND NECESSITY. AT CASA GRANDE, 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 CERTIFICATE OF ITS EXISTING CERTIFICATE OF CONVENIENCE AND NECESSITY.

DOCKET NO. W-03576A-05-0926

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 the application that Santa Cruz Water Company ("Santa Cruz") is now pursuing in Docket No. W-03576A-07-0300 (the "New Docket"). This Motion is based upon the following:

AWC already has pending in Docket Nos. W-01445A-06-0199, SW-03575A-05-0926, and W-03576A-05-0926 (the "Consolidated Dockets") an application for a Certificate of Convenience and Necessity ("CC&N") for authority to provide water

1 service to the same area as the CC&N area that Santa Cruz has applied for in the New
2 Docket. AWC's application to intervene in the New Docket was approved by a
3 procedural order entered on June 26, 2007.

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

- 8
- 9 a. AWC has longstanding plans to extend water service to the expansion area
10 and, as a result of such planning and the existence of its adjacent water
11 systems in Stanfield, Casa Grande and Coolidge, AWC can offer more
12 reliable water service, lower cost of water facilities, and lower water rates
13 than Santa Cruz.
- 14 b. AWC is already constructing the interconnection of its Casa Grande and
15 Coolidge water systems, and is well underway on planning the
16 engineering and design for construction of a required water treatment
17 plant to treat its combined Casa Grande and Coolidge Central Arizona
18 Project water allocations and thereby supplement its required water
19 supplies. AWC's planned construction of a water treatment plant has
20 been supported by the Mayors and City Councils of Casa Grande and
21 Coolidge.

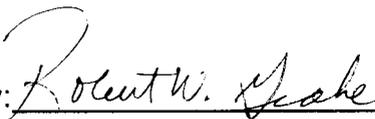
22 In addition, A.A.C. R14-3-109.H provides that "...the presiding officer may
23 consolidate two or more proceedings in one hearing when it appears that the issues are
24 substantially the same and that the rights of the parties will not be prejudiced by such
25 procedure..." That is precisely the case in the Consolidated Dockets and the New
26 Docket. The rights of Santa Cruz, AWC, the Commission Staff, and the intervenors
27 would not be prejudiced by the requested consolidation. Hearings have been stayed
28 indefinitely in the Consolidated Dockets, and no hearings have been scheduled in the

1 New Docket. No party to this proceeding can, with any justification, claim unfair
2 surprise, or that the consolidation of these proceedings and any subsequent hearing(s)
3 would be unduly burdensome. In fact, if these matters are not consolidated and heard
4 together, the Commission will be required to hold multiple hearings to hear much of the
5 same evidence. It would be a needless duplication of effort and an inefficient use of the
6 Commission's and the parties' resources if multiple analyses and hearings were
7 required.

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

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

12 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
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6 COPY of the foregoing was hand-delivered this 17th day of July, 2007 to:

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