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INTERVENTION

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

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

Arizona Corporation Commission

DOCKETED

AUG -1 2007

DOCKETED BY	nr
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IN THE MATTER OF THE APPLICATION
OF WATER UTILITY OF GREATER
TONOPAH, INC., AN ARIZONA
CORPORATION, FOR AN EXTENSION OF
ITS CERTIFICATE OF CONVENIENCE
AND NECESSITY

DOCKET NO. W-02450A-06-0626

MOTION TO INTERVENE

RECEIVED
 2007 AUG -1 10:01 AM
 ARIZONA CORPORATION COMMISSION

In accordance with A.A.C. R14-3-105, Belmont LKY 20K Limited Partnership L.L.P., an Arizona limited liability limited partnership; SMT Investors Limited Partnership, an Arizona limited partnership; Cardon Family, L.L.C., an Arizona limited liability company; Far Marel, L.L.C., an Arizona limited liability company; Mt. Olympus Investments, L.L.C., an Arizona limited liability company; Neal Management, L.L.C., an Arizona limited liability company; Michael T. Cowley, as Trustee of the ANC Irrevocable Trust dated October 18, 2004; Ben Fatto Limited Partnership, an Arizona limited partnership; Boa Sorte Limited Partnership, an Arizona limited partnership; Viel Gluck Limited Partnership, an Arizona limited partnership; and Goodwin Consultants, L.L.C., an Arizona limited liability company (collectively, "Belmont") hereby move for leave to intervene in the above-entitled matter. Belmont asserts that, as a significant property owner in the extension area, it has a direct and substantial interest in this proceeding, and that its intervention will not broaden or unduly delay a decision by the Arizona Corporation Commission in this docket.

Belmont has a direct and material interest in Water Utility of Greater Tonopah's ("WUGT") application to extend its certificate of convenience and necessity ("CC&N") in this docket. Specifically, Belmont represents the interests of the property owners of the Belmont

1 Development, which includes approximately 20,000 acres of land situated in the proposed CC&N
2 extension area ("the Belmont Property") in this docket. WUGT is seeking to extend its CC&N to
3 include the Belmont Property.

4 Belmont has requested utility service from WUGT for the Belmont Property and Belmont
5 seeks intervention based on its property rights in the extension area. Accordingly, Belmont
6 should be allowed to intervene as a party and fully participate in this docket as necessary.
7 Granting intervention to Belmont will not unduly broaden the issues before the Commission or
8 unduly delay this proceeding.

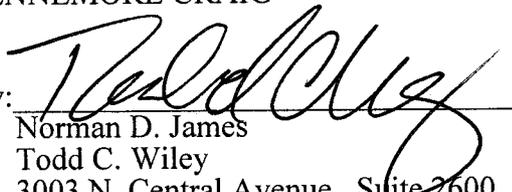
9 The name, address and telephone number of the person upon whom service of all
10 documents is to be made is:

11 Norman D. James
12 Todd C. Wiley
13 FENNEMORE CRAIG, P.C.
14 3003 North Central Avenue, Suite 2600
15 Phoenix, Arizona 85012
16 (602) 916-5337
17 (602) 916-5537 (Facsimile)

18 For the foregoing reasons, Belmont respectfully requests that it be granted leave to
19 intervene as a party in the above-entitled matter.

20 RESPECTFULLY submitted this 1 day of August, 2007.

21 FENNEMORE CRAIG

22 By: 
23 Norman D. James
24 Todd C. Wiley
25 3003 N. Central Avenue, Suite 2600
26 Phoenix, Arizona 85012
Attorneys for Belmont

27 ORIGINAL and thirteen (13) copies
28 Filed with Docket Control this 1st day
29 of August, 2007.

1 A COPY of the foregoing was
hand-delivered this 15th day of August, 2007 to:

2 Yvette B. Kinsey
3 Administrative Law Judge
Hearing Division
4 ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
5 Phoenix, AZ 85007

6 Christopher Kempley, Chief Counsel
Legal Division
7 ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
8 Phoenix, AZ 85007

9 Ernest Johnson, Director
Utilities Division
10 ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
11 Phoenix, AZ 85007

12 A COPY of the foregoing was mailed
this 15th day of August, 2007 to:

13 Timothy J. Sabo
14 ROSHKA, DeWULF & PATTEN, PLC
One Arizona Center
15 400 East Van Buren Street, Suite 800
Phoenix, AZ 85004
16 Attorneys for WUGT

17
18 By: JN House

19 1940555.1

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