

ORIGINAL



BEFORE THE ARIZONA CORPORATION COMMISSION  
**INTERVENTION RECEIVED**

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

2007 AUG 29 P 3:02  
AZ CORP COMMISSION  
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF  
ARIZONA-AMERICAN WATER COMPANY,  
AN ARIZONA CORPORATION, FOR A  
DETERMINATION OF THE CURRENT FAIR  
VALUE OF ITS UTILITY PLANT AND  
PROPERTY AND FOR INCREASES IN ITS  
RATES AND CHARGES BASED THEREON  
FOR UTILITY SERVICE BY ITS SUN CITY  
WATER DISTRICT

DOCKET NO. W-01303A07-0209

**TOWN OF YOUNGTOWN  
MOTION TO INTERVENE**

Arizona Corporation Commission  
**DOCKETED**  
AUG 29 2007

DOCKETED BY	<i>nr</i>
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The Town of Youngtown ("Youngtown") hereby applies to the Arizona Corporation Commission ("Commission") for an Order granting it leave to intervene in the above-captioned proceeding pursuant to A.A.C. R14-3-105 and the Procedural Order entered in this matter dated June 5, 2007. Youngtown's Motion is supported by the following:

1. Youngtown and its residents receive water service from Arizona-American Water Company.
2. Youngtown and its residents will be directly and substantially affected by the Commission's Decision in the above-captioned matter.
3. It is necessary and proper that Youngtown intervene in the proceeding.
4. The participation of Youngtown in the above-captioned matter will not unduly broaden the issues to be presented.
5. The names, mailing addresses, telephone and facsimile numbers and e-mails of the persons upon whom service of all documents are to be made are:

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William P. Sullivan, Esq.  
Susan D. Goodwin, Esq.  
Larry K. Udall, Esq.  
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ludall@cgsuslaw.com

with copies to:

Lloyce Robinson, Town Manager  
12030 Clubhouse Square  
Town of Youngtown, 85363  
Telephone: (623) 933-8286  
Facsimile: (623) 933-5951  
lrobinson@youngtownaz.org

DATED this 27<sup>th</sup> day of August, 2007.

CURTIS, GOODWIN, SULLIVAN,  
UDALL & SCHWAB, P.L.C.

By:   
William P. Sullivan  
Susan D. Goodwin  
Larry K. Udall  
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Attorneys for Town of Youngtown

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**PROOF OF AND CERTIFICATE OF MAILING**

I hereby certify that on this 29<sup>th</sup> day of August 2007, I caused the foregoing document to be served on the Arizona Corporation Commission by delivering the original and thirteen (13) copies of the above to:

Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

COPY of the foregoing mailed  
this 29<sup>th</sup> day of August 2007 to:

Christopher Kempley, Chief Counsel  
Robin Mitchell, Counsel  
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Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

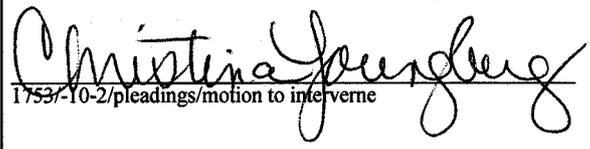
Ernest Johnson, Director  
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Arizona Corporation Commission  
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Arizona-American Water Company  
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17537-10-2/pleadings/motion to intervene