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1 FENNEMORE CRAIG, P.C.  
2 Jay L. Shapiro (No. 014650)  
3 Todd C. Wiley (No. No. 015358)  
4 3003 N. Central Ave.  
5 Suite 2600  
6 Phoenix, Arizona 85012  
7 Attorneys for Litchfield Park Service Company

**BEFORE THE ARIZONA CORPORATION COMMISSION**

W-01427A-09-0104

8 IN THE MATTER OF THE  
9 APPLICATION OF LITCHFIELD PARK  
10 SERVICE COMPANY, AN ARIZONA  
11 CORPORATION, FOR A  
12 DETERMINATION OF THE FAIR  
13 VALUE OF ITS UTILITY PLANTS AND  
14 PROPERTY AND FOR INCREASES IN  
15 ITS WATER AND WASTEWATER  
16 RATES AND CHARGES FOR UTILITY  
17 SERVICE BASED THEREON.

DOCKET NO: W-01427A-09-\_\_\_\_\_

**MOTION TO CONSOLIDATE**

14 Litchfield Park Service Company, an Arizona public service corporation  
15 ("LPSCO" or "the Company"), hereby files this Motion to Consolidate the above-  
16 captioned matter with the Application filed by Litchfield Park Service Company in  
17 Docket No. SW-01428A-09-\_\_\_\_\_.

18 Such relief is appropriate and will conserve judicial resources because both rate  
19 case filings are for the same company. The facts giving rise to these two rate cases and  
20 the legal issues presented therein are identical. The parties to these two rate cases are the  
21 same and no party will be prejudiced by consolidation. The customer bases of the water  
22 and wastewater divisions of LPSCO are largely the same, and LPSCO is operated and  
23 managed as one utility providing water and sewer service. Since these two matters are  
24 inextricably linked, consolidation is consistent with the interests of administrative  
25 efficiency and administrative economy.

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RESPECTFULLY SUBMITTED this 9th day of March, 2009.

FENNEMORE CRAIG, P.C.

By 

Jay L. Shapiro  
Todd C. Wiley  
3003 North Central Avenue  
Suite 2600  
Phoenix, Arizona 85012  
Attorneys for Litchfield Park Service  
Company

ORIGINAL and thirteen (13) copies of the  
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