0000094481

ORIGINAL

Stephen A. Cockrum
5328 Corral Drive
Hereford, AZ 85615

RECEIVED

2009 MAR 12 A 9:52

DOCKET NOS.: **W-20453A-06-0247**
W-20454A-06-0248
W-20453A-06-0251
W-20454A-06-0251
W-01646A-06-0251
W-01868A-06-0251
W-02235A-06-0251
W-02316A-06-0251
W-02230A-06-0251
W-01629A-06-0251
W-02240A-06-0251

February 25, 2009

Arizona Corporation Commission
DOCKETED
MAR 13 2009
DOCKETED BY

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

Re:
IN THE MATTER OF THE INDIVIDUAL AND JOINT APPLICATIONS OF NORTHERN SUNRISE WATER COMPANY AND SOUTHERN SUNRISE WATER COMPANY TO PROVIDE WATER UTILITY SERVICE IN COCHISE COUNTY, ARIZONA AND OTHER MATTERS

INTERVENOR'S RESPONSE TO APPLICANTS REQUEST FOR EXTENSION OF TIME TO FILE RATE CASE

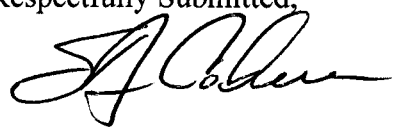
By their motion, Applicants seek to extend the deadline to file general rate cases until and no later than August 31, 2009. The stated purpose of the extension request is to allow for the test years to be used by Northern Sunrise Water Company and Southern Water Company to be matched to an available test year for an "affiliate", namely Bella Vista Water Company ("BVWC"). Applicants further state that they believe that tangible benefits can be derived from a consolidation of the three water companies into a single water service provider. Applicant states further that it intends to show the Commission why such consolidation is in the "public interest".

I have no objection to the granting of the request for an extension of time per se, but I am troubled somewhat by the reason for the request. At this moment, I am not at all convinced that a consolidation of these three water companies into a single entity will meet the criteria of being in the long term public interest, and I am somewhat further concerned that the granting of the extension to Northern and Southern Sunrise Water Companies will open the door for them to incorporate their consolidation request within the application for the general rate case.

The applications for general rates should be, in my opinion, separate and apart from any application to the Commission for consolidation. That is not to say, however, that an application

for consolidation could not be submitted concurrently with an application(s) for a general rate case, but the two matters should and must be considered on their own merits. Presuming that my opinion is consistent with the thinking of the Court and/or the Commission, I would have no problem with the Court and/or the Commission granting the request of the Applicants.

Respectfully Submitted,



Stephen A Cockrum
Hereford, AZ