

ORIGINAL



0000102167

RECEIVED

2009 SEP -1 P 4:44

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

SEP 1 2009

DOCKETED BY
[Signature]

1 FENNEMORE CRAIG
A Professional Corporation
2 Jay L. Shapiro (No. 014650)
Patrick J. Black (No. 017141)
3 3003 N. Central Ave.
Suite 2600
4 Phoenix, Arizona 85012
Attorneys for Bella Vista Water Co., Inc.
5 Northern Sunrise Water Company Inc. and
Southern Sunrise Water Company Inc.
6

7 **BEFORE THE ARIZONA CORPORATION COMMISSION**

8
9 IN THE MATTER OF BELLA VISTA
WATER CO, INC., NORTHERN
10 SUNRISE WATER COMPANY INC.,
AND SOUTHERN SUNRISE WATER
11 COMPANY INC.'S JOINT
APPLICATION FOR APPROVAL OF
12 AUTHORITY TO CONSOLIDATE
OPERATIONS, AND FOR THE
13 TRANSFER OF UTILITY ASSETS TO
BELLA VISTA WATER CO., INC.,
14 PURSUANT TO ARIZONA REVISED
STATUTES 40-285
15

DOCKET NO: W-02465A-09-0414
DOCKET NO. W-20453A-09-0414
DOCKET NO. W-20454A-09-0414

MOTION TO CONSOLIDATE

16
17 Bella Vista Water Co., Inc. ("BVWC"), Northern Sunrise Water Company, Inc.,
18 ("NSWC") and Southern Sunrise Water Company, Inc. ("SSWC") (collectively the "Joint
19 Applicants") hereby file this Motion to Consolidate the above-captioned matter with the
20 rate case applications filed by Bella Vista Water Co., Inc. ("BVWC") in Docket No.
21 W-02465A-09-0411, Northern Sunrise Water Company Inc. ("NSWC") in Docket No.
22 W-20453A-09-0412 and Southern Sunrise Water Company Inc. ("SSWC") in Docket No.
23 W-20454A-09-0413.

24 BVWC, NSWC and SSWC are all affiliated companies owned by Algonquin
25 Water Resources of America, Inc. ("Algonquin"). In addition to filing separate individual
26 rate cases, BVWC, NSWC and SSWC have also filed a Joint Application to request that

1 the Arizona Corporation Commission ("Commission") approve a consolidation of the
2 companies' operations and their rates. By approving this Motion to Consolidate, the
3 Commission can consider the Joint Applicants' request for rate consolidation, and
4 consider the benefits of consolidation on all potentially affected water customers against
5 the rate impact if all three rate structures otherwise remain separate. Notably, however,
6 consolidation will not preclude a decision not to consolidate the three water providers as
7 each rate case application contains all of the required testimony and supporting schedules
8 upon which each individual company's rate can be set. Because consolidating the four
9 applications will promote judicial economy and administrative efficiency, granting the
10 Motion to Consolidate is in the public interest.

11 **RELIEF REQUESTED**

12 WHEREFORE, the Joint Applicants respectfully requests the following:

- 13 1. That the Commission proceed to consider and act upon this Motion as
14 timely as possible by entering an Order approving the Motion, and
15 2. Grant any other such relief as the Commission deems appropriate.

16 RESPECTFULLY SUBMITTED this 1st day of September, 2009.

17 FENNEMORE CRAIG, P.C.

18
19 By 

20 Jay L. Shapiro
21 Patrick J. Black
22 3003 North Central Avenue
23 Suite 2600
24 Phoenix, Arizona 85012
25 Attorneys for Bella Vista Water Co., Inc.
26 Northern Sunrise Water Company Inc. and
Southern Sunrise Water Company Inc.

1 ORIGINAL and thirteen (13) copies
2 of the foregoing were filed
3 this 1st day of September, 2009 to:

4 Docket Control
5 Arizona Corporation Commission
6 1200 W. Washington St.
7 Phoenix, AZ 85007

8 By: *Maria San Jose*
9 2233194.1

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26