



0000102171

ORIGINAL

RECEIVED

2009 SEP -1 P 4:46

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

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

BEFORE THE ARIZONA CORPORATION COMMISSION

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

DOCKET NO: W-20454A-09-0413

Arizona Corporation Commission

DOCKETED

SEP 2 2009

| | |
|-------------|-----------|
| DOCKETED BY | <i>MM</i> |
|-------------|-----------|

14 Southern Sunrise Water Company Inc. ("SSWC") hereby files this Motion to
 15 Consolidate the above-captioned matter with the rate case applications filed by Bella Vista
 16 Water Co., Inc. ("BVWC") in Docket No. W-02465A-09-0411 and Northern Sunrise
 17 Water Company Inc. ("NSWC") in Docket No. W-20453A-09-0412, as well as the Joint
 18 Application filed by BVWC, NSWC and SSWC in Docket No. W-02465A-09-0414 (the
 19 "Joint Application").

20 BVWC, NSWC and SSWC are all affiliated companies owned by Algonquin
 21 Water Resources of America, Inc. ("Algonquin"). In addition to filing separate individual
 22 rate cases, BVWC, NSWC and SSWC have also filed a Joint Application to request that
 23 the Arizona Corporation Commission ("Commission") approve a consolidation of the
 24 companies' operations and their rates. By approving this Motion to Consolidate, the
 25 Commission can consider SSWC's request for rate consolidation, and consider the
 26 benefits of consolidation on all potentially affected water customers against the rate

1 impact if all three rate structures otherwise remain separate. Notably, however,
2 consolidation will not preclude a decision not to consolidate the three water providers as
3 each rate case application contains all of the required testimony and supporting schedules
4 upon which each individual company's rate can be set. Because consolidating the four
5 applications will promote judicial economy and administrative efficiency, granting the
6 Motion to Consolidate is in the public interest.

7 **RELIEF REQUESTED**

8 WHEREFORE, SSWC respectfully requests the following:

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

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

13 FENNEMORE CRAIG, P.C.

14
15 By 

16 Jay L. Shapiro
17 Patrick J. Black
18 3003 North Central Avenue
19 Suite 2600
Phoenix, Arizona 85012
Attorneys for Southern Sunrise Water
Company Inc.

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

22 Docket Control
23 Arizona Corporation Commission
24 1200 W. Washington St.
Phoenix, AZ 85007

25 By: 

26 2233193.1