

ORIGINAL

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

KRISTIN K. MAYES, Chairman
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BOB STUMP

2009 OCT 14 P 2:42

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF LITCHFIELD PARK SERVICE COMPANY, AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE FAIR VALUE OF ITS UTILITY PLANTS AND PROPERTY AND FOR INCREASES IN ITS WASTEWATER RATES AND CHARGES FOR UTILITY SERVICE BASED THEREON.

DOCKET NO. SW-01428A-09-0103

IN THE MATTER OF THE APPLICATION OF LITCHFIELD PARK SERVICE COMPANY, AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE FAIR VALUE OF ITS UTILITY PLANTS AND PROPERTY AND FOR INCREASES IN ITS WATER RATES AND CHARGES FOR UTILITY SERVICE BASED THEREON.

DOCKET NO. W-01427A-09-0104

MOTION TO INTERVENE

1 Pursuant to A.A.C. R14-3-105 and the Procedural Order entered in this matter dated May
2 21, 2009, Westcor/Goodyear LLC ("Westcor") and Globe Land Investors, L.L.C. ("Globe")
3 (together "Westcor/Globe"), hereby move to intervene in the above-captioned proceeding. In
4 support of its motion, Westcor/Globe states as follows:

5 **I Service**

6 Please serve all documents on:

7 Craig A. Marks
8 Craig A. Marks, PLC
9 10645 N. Tatum Blvd., Ste. 200-676
10 Phoenix, Arizona 85028
11 (480) 367-1956 (Direct)
12 (480) 367-1956 (Fax)
13 Craig.Marks@azbar.org
14 Attorney for Westcor/Globe

Arizona Corporation Commission

DOCKETED

OCT 14 2009

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1 **II Interest in Proceeding**

2 Westcor and Globe are Arizona and Delaware limited liability companies which have
3 worked together in the development of Estrella Falls, a mixed-use land development located in
4 the City of Goodyear. Westcor is the master developer of public and private infrastructure for
5 Estrella Falls, and Westcor and Globe each are responsible for a share of the cost of planning and
6 constructing improvements necessary for the provision of water and wastewater service to that
7 project.

8 Estrella Falls is located within the area for which Litchfield Park Service Company
9 (“LPSCO”) is responsible for providing water and wastewater treatment service under a
10 Certificate of Convenience and Necessity (“CC&N”) issued by the Arizona Corporation
11 Commission (“the Commission”).

12 Westcor/Globe has a particular interest in water and sewer hook-up fees that may be
13 charged by LPSCO. Westcor/Globe has already tendered — and LPSCO has accepted —
14 negotiated fees for off-site water and sewer infrastructure associated with the Estrella Falls
15 development. Accordingly, it is Westcor/Globe’s position, which they believe is supported by
16 LPSCO, that no additional hook-up fees should be owed for off-site water and sewer
17 infrastructure for this development.

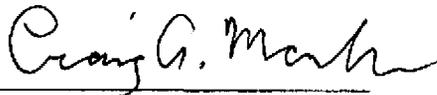
18 Westcor/Globe reserves the right to take positions on any other issues in this case.

19 No other party can adequately represent Westcor/Globe’s interests.

20 **III Requested Relief**

21 Westcor/Globe asks that the Commission grant its Motion to Intervene.

1 RESPECTFULLY SUBMITTED on October 14, 2009.
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15 **Original** and 15 copies filed
16 on October 14, 2009, with:

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18 Docket Control
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23 **Copy** of the foregoing **mailed**
24 on October 14, 2009, to:

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