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CONFIDENTIAL

BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

- 3 KRISTIN K. MAYES - Chairman
- 4 GARY PIERCE
- 5 PAUL NEWMAN
- 6 SANDRA D. KENNEDY
- 7 BOB STUMP

2009 OCT 20 P 3:47
 ARIZONA CORPORATION COMMISSION
 DOCKET CONTROL

7 IN THE MATTER OF THE APPLICATION OF
 8 LITCHFIELD PARK SERVICE COMPANY,
 9 AN ARIZONA CORPORATION, FOR
 10 AUTHORITY (1) TO ISSUE EVIDENCE OF
 11 INDEBTEDNESS IN AN AMOUNT NOT TO
 12 EXCEED \$1,755,000 IN CONNECTION WITH
 (A) THE CONSTRUCTION OF TWO
 RECHARGE WELL INFRASTRUCTURE
 IMPROVEMENTS AND (2) TO ENCUMBER
 REAL PROPERTY AND PLANT AS
 SECURITY FOR SUCH INDEBTEDNESS.

DOCKET NO. W-01427A-09-0116

STAFF'S MOTION TO CONSOLIDATE

14 On March 13, 2009, Litchfield Park Service Company ("LPSCO") filed an application before
 15 the Arizona Corporation Commission ("Commission") requesting authority to issue evidence of
 16 indebtedness in an amount no to exceed \$1,755,000 in Docket No. W-01427A-09-0116.

17 On the same day, LPSCO also filed before the Commission an application before the
 18 Commission requesting authority to incur evidence of indebtedness in an amount not to exceed
 19 \$1,170,000 in Docket No. W-01427A-09-0120.

20 Staff has reviewed the applications and it is Staff's opinion that since the two applications
 21 will of necessity impact one another, it would be appropriate to process them in within a single
 22 docket.

23 Staff also believes that consolidating the two dockets will conserve Commission resources.

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Arizona Corporation Commission

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OCT 20 2009

DOCKETED BY	<i>[Signature]</i>
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1 WHEREFORE, Staff respectfully requests that the Hearing Division consolidate these two
2 matters.

3 RESPECTFULLY SUBMITTED this 20th day of October, 2009.

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6 _____
7 Kevin O. Torrey SBN#022300
8 Attorney, Legal Division
9 Arizona Corporation Commission
10 1200 West Washington Street
11 Phoenix, Arizona 85007
12 (602) 542-3402

11 Original and thirteen (13) copies
12 of the foregoing were filed this
13 20th day of October, 2009 with:

14 Docket Control
15 Arizona Corporation Commission
16 1200 West Washington Street
17 Phoenix, Arizona 85007

18 Copy of the foregoing mailed this
19 20th day of October, 2009 to:

20 Patrick Black
21 Jay L. Shapiro
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