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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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COMMISSIONERS

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AZ CORP COMMISSION
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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 SERVICES BASED THEREON.

DOCKET NO. W-01427A-09-0104

MOTION TO CONSOLIDATE

On March 9, 2009, Litchfield Park Service Company ("LPSCO") filed before the Arizona Corporation Commission ("Commission") applications for rate increases for its water and wastewater service in the above-captioned dockets. LPSCO filed Motions to Consolidate the dockets at the same time.

On May 21, 2009, the Commission Hearing Division granted the consolidation of the dockets.

On March 13, 2009, LPSCO filed an application before the Commission requesting authority to issue evidence of indebtedness in an amount not to exceed \$1,755,000 in Docket No. W-01427A-09-0116.

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

1 On October 20, 2009, Commission Utilities Division Staff ("Staff") filed a motion requesting
2 that the two financing applications be consolidated.

3 On November 6, 2009, the Hearing Division granted consolidation of the financing dockets.

4 It is Staff's position that the Commission would conserve valuable resources if the
5 consolidated rate applications and the consolidated financing applications were further consolidated
6 into a single proceeding. Staff's testimony in the rate proceedings includes an analysis of the merits
7 of the financing proceedings. Although the Company will have limited time to respond to Staff's
8 testimony regarding the financings, the Company will likely have very little to address, given that
9 Staff has recommended approval of the financing dockets. It is therefore unlikely that consolidation
10 will result in a delay in any way.

11 WHEREFORE, Staff respectfully requests that these matters be consolidated.

12 RESPECTFULLY SUBMITTED this 16th day of November, 2009.

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15 _____
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19 Original and thirteen (13) copies
20 of the foregoing were filed this
21 16th day of November, 2009, with:

21 Docket Control
22 Arizona Corporation Commission
23 1200 West Washington Street
24 Phoenix, Arizona 85007

25 Copies of the foregoing were mailed
26 this 16th day of November, 2009 to:

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