

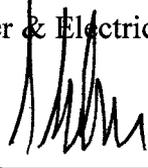
1 adjustments and allocations MWE made relate to both departments. In other words, it would be
2 necessary to describe and discuss the Electric Department when describing allocations and
3 adjustments to the Water Department. In fact, keeping the proceedings separate might result in
4 the same matters and issues being litigated twice, with the potential for inconsistent results.
5 Consolidating the two matters will not result in any improper bias; rather, it will allow the parties
6 and Commission to more efficiently evaluate MWE's requests in one proceeding.

7 In short, consolidating MWE's rate applications would allow its rate requests to be
8 addressed in one action. Therefore, consolidation promotes administrative efficiency, and avoids
9 confusion of the issues, needless presentation of cumulative evidence and waste of time.
10 Further, Staff does not oppose consolidating these two matters.

11 WHEREFORE, MWE respectfully requests that an order be issued consolidating this
12 matter with Docket No. E-01049A-11-0300.

13 RESPECTFULLY SUBMITTED this 9th day of August, 2011.

14 Morenti Water & Electric Company

15 
16 
17 By _____

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24 Original and 13 copies of the foregoing
25 filed this 9th day of August, 2011, with:

26 Docket Control
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1 Copy of the foregoing hand-delivered
2 this 9th day of August, 2011, to:

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By Debbie Amund