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BEFORE THE ARIZONA CORPORATION COMMISSION

8
 9 IN THE MATTER OF THE APPLICATION
 10 OF PIMA UTILITY COMPANY, AN
 11 ARIZONA CORPORATION, FOR A
 12 DETERMINATION OF THE FAIR VALUE
 13 OF ITS UTILITY PLANTS AND
 PROPERTY AND FOR INCREASES IN
 ITS WASTEWATER RATES AND
 CHARGES FOR UTILITY SERVICE
 BASED THEREON.

DOCKET NO: SW-02199A-11-0330

MOTION TO CONSOLIDATE

14 Pima Utility Company, an Arizona public service corporation (“Pima” or the
 15 “Company”), hereby files this Motion to Consolidate the above-captioned matter with the
 16 Application filed in Docket No. SW-02199A-11-0329.

17 Such relief is appropriate and will conserve judicial resources because both rate
 18 case filings are for the same company. Pima’s water and wastewater customer bases are
 19 largely the same, and Pima is operated and managed as one utility. The facts giving rise
 20 to these two rate cases and the legal issues presented therein are identical. In fact, the
 21 Company submitted one version of direct testimony, addressing both the water and
 22 wastewater divisions, for the reasons given and with consolidation in mind. Because
 23 these matters are inextricably linked, consolidation is consistent with the interests of
 24 administrative efficiency and administrative economy.

Arizona Corporation Commission

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RESPECTFULLY SUBMITTED this 19th day of September, 2011.

FENNEMORE CRAIG, P.C.

By  _____
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ORIGINAL and thirteen (13) copies of the
foregoing were delivered
this 19th day of September, 2011, to:

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

COPY of the foregoing was delivered
this 19th day of September, 2011, to:

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