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BEFORE THE ARIZONA CORPORATION COMMISSION

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

DOCKET NO: W-02199A-11-0329

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-11-0330.

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.

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RESPECTFULLY SUBMITTED this 19<sup>th</sup> day of September, 2011.

FENNEMORE CRAIG, P.C.

By  \_\_\_\_\_  
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ORIGINAL and thirteen (13) copies of the foregoing were delivered this 19<sup>th</sup> day of September, 2011, to:

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

COPY of the foregoing was delivered this 19<sup>th</sup> day of September, 2011, to:

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