

ORIGINAL



0000131753

RECEIVED

2011 NOV 16 P 4: 01

FENNEMORE CRAIG
A Professional Corporation
Jay L. Shapiro (No. 014650)
3003 North Central Avenue, Suite 2600
Phoenix, Arizona 85012
Telephone (602) 916-5000

AZ CORP COMMISSION
DOCKET CONTROL

Attorneys for Pima Utility Company

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF PIMA UTILITY COMPANY, AN
ARIZONA CORPORATION, FOR
AUTHORITY TO: (1) ISSUE EVIDENCE OF
INDEBTEDNESS IN AN AMOUNT NOT TO
EXCEED \$8,370,000 IN CONNECTION
WITH (A) INFRASTRUCTURE
IMPROVEMENTS TO THE UTILITY
SYSTEM AND (B) THE PURCHASE OF
EQUITY; AND (2) ENCUMBER REAL
PROPERTY AND PLANT AS SECURITY
FOR SUCH INDEBTEDNESS.

DOCKET NO: W-02199A-11-0403

MOTION TO CONSOLIDATE

Arizona Corporation Commission

DOCKETED

NOV 16 2011

DOCKETED BY

Pima Utility Company, an Arizona public service corporation (“Pima” or the “Company”), hereby files this Motion to Consolidate the above-captioned matter with the Financing Application filed in Docket No. SW-02199A-11-0404.

Such relief is appropriate and will conserve judicial resources because both financing applications are for the same company. Pima’s water and wastewater customer bases are largely the same, and Pima is operated and managed as one utility. The facts giving rise to these two financing applications and the legal issues presented therein are identical. The new debt being sought will be used to replace existing debt and fund infrastructure improvements for both the water and wastewater divisions of the Company. Because these matters are inextricably linked, consolidation is consistent with the interests of administrative efficiency and administrative economy.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

RESPECTFULLY SUBMITTED this 16th day of November, 2011.

FENNEMORE CRAIG, P.C.

By _____


J. A. Shapiro
3003 North Central Avenue
Suite 2600
Phoenix, Arizona 85012
Attorneys for Pima Utility Company

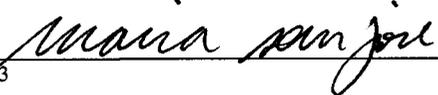
ORIGINAL and thirteen (13) copies of the foregoing were delivered this 16th day of November, 2011, to:

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

COPY of the foregoing delivered this 16th day of November, 2011, to:

Robin Mitchell, Esq.
Nancy Scott, Esq.
Legal Division
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

Steve Olea, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

By: 
2504213