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5 Attorneys for Litchfield Park Service Company

7 **BEFORE THE ARIZONA CORPORATION COMMISSION**

8 IN THE MATTER OF THE APPLICATION  
OF LITCHFIELD PARK SERVICE  
9 COMPANY FOR A WAIVER UNDER  
A.A.C. R14-2-806 OR, IN THE  
10 ALTERNATIVE, NOTICE OF INTENT TO  
11 REORGANIZE UNDER A.A.C. R14-2-803.

DOCKET NO: SW-01428A-11-0420

**MOTION TO CONSOLIDATE**

12 Litchfield Park Service Company ("LPSCO" or the "Company") hereby files this  
13 Motion to Consolidate the above-captioned matter with the Application filed in Docket  
14 No. W-01427A-11-0419.

15 Such relief is appropriate and will conserve judicial resources because both filings  
16 are for the same company. LPSCO's water and wastewater customer bases are largely the  
17 same, and LPSCO is operated and managed as one utility. The facts giving rise to the  
18 applications and the legal issues presented therein are identical. In fact, the Company  
19 submitted one version of the application, for the reasons given and with consolidation in  
20 mind. Because these matters are inextricably linked, consolidation is consistent with the  
21 interests of administrative efficiency and administrative economy.

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Arizona Corporation Commission

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RESPECTFULLY SUBMITTED this 22<sup>nd</sup> day of December, 2011.

FENNEMORE CRAIG, P.C.

By:   
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**ORIGINAL** and fifteen (13) copies  
of the foregoing were filed  
this 22<sup>nd</sup> day of December, 2011, to:

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

**COPY** of the foregoing was emailed/mailed  
this 22<sup>nd</sup> day of December, 2011, to:

Jane Rodda  
Hearing Division  
Arizona Corporation Commission  
400 W. Congress, Ste 218  
Tucson, AZ 85701

**COPY** of the foregoing was hand-delivered  
this 22<sup>nd</sup> day of December, 2011, to:

Robin Mitchell  
Legal Division  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007

By: 