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UDALL | SHUMWAY INTERVENTION



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1138 NORTH ALMA SCHOOL ROAD, SUITE 101
MESA, ARIZONA 85201
Telephone: 480.461.5300 | Fax: 480.833.9392
Roger C. Decker - #005411
rcd@udallshumway.com
Attorneys for Santa Cruz Valley USD #35

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF RIO RICO UTILITIES, INC., AN
ARIZONA CORPORATION, FOR A
DETERMINATION OF THE FAIR VALUE
OF ITS UTILITY PLANTS AND
PROPERTY AND FOR INCREASE IN ITS
WATER AND WASTERWATER RATES
AND CHARGES FOR UTILITY SERVICES
BASED THEREON,

NO. WS-02676A-12-0196

SANTA CRUZ VALLEY UNIFIED
SCHOOL DISTRICT #35'S
APPLICATION TO INTERVENE

The SANTA CRUZ VALLEY UNIFIED SCHOOL DISTRICT #35, a political subdivision of the State of Arizona ("School District"), respectfully applies for leave to intervene in this proceeding pursuant to A.A.C. R-14-3-105.

I. The School District Should Be Granted Intervention.

Pursuant to R-14-3-105(A), persons who are "directly and substantially affected by the proceedings" may apply to intervene. The School District, on information and belief, is one of the larger customers of Rio Rico Utilities, Inc.; the School District operates several campuses with 3,400 students, plus several hundred additional faculty and staff. Therefore, as one of Rio Rico's Utilities' larger customers, it is directly and substantially affected by a Decision or Order of the Commission in this matter. Furthermore, most of the School District's students, faculty and employees are customers of Rio Rico Utilities and those customers will be directly and substantially affected by a Decision or Order of the Commission in this matter.

Arizona Corporation Commission

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JAN 29 2013

DOCKETED BY [Signature]

1 **II. Contact Information**

2 Copies of all documents, pleadings and pre-filed testimony, and all data requests
3 or other requests for information, should be directed to the School District's counsel:

4 Roger C. Decker
5 UDALL SHUMWAY PLC
6 1128 N. Alma School Road, Suite 101
7 Mesa, Arizona 85201
8 red@udallshumway.com

8 **III. Conclusion**

9 It is not anticipated that granting the School District's Motion to Intervene will
10 unduly broaden any issue before the Commission.

11 For the foregoing reasons, the Santa Cruz Valley Unified School District #35
12 respectfully requests that the Commission issue a procedural order granting the District
13 intervention in this case.

14 RESPECTFULLY SUBMITTED this 23rd day of January, 2013.

15 UDALL SHUMWAY PLC

16
17 By Roger C. Decker
18 Roger C. Decker
19 1138 North Alma School Road
20 Suite 101
21 Mesa, AZ 85201
22 Attorneys for Santa Cruz Valley USD #35

22 Original plus 15 copies of the of the
23 foregoing filed this 23 day of January,
24 2013, with:

25 Docket Control
26 Arizona Corporation Commission
27 400 W. Congress, Suite 218
28 Tucson, AZ 85701-1347

1 Copies mailed to this 23 day of
2 January, 2013, to:

3 Lyn Farmer
4 Chief Administrative Law Judge
5 Hearing Division
6 Arizona Corporation Commission
7 1200 West Washington
8 Phoenix, AZ 85007

9 Janice Alward, Chief Counsel
10 Legal Division
11 Arizona Corporation Commission
12 1200 West Washington
13 Phoenix, AZ 85007

14 Steven Olea, Director
15 Utilities Division
16 1200 West Washington
17 Phoenix, AZ 85007

18 Jay L. Shapiro
19 Fennemore Craig, P.C.
20 3003 N. Central Avenue
21 Suite 2600
22 Phoenix, AZ 85012
23 Attorneys for Rio Rico Utilities

24 Greg Sorensen
25 Vice President & General Manager
26 Liberty Utilities
27 12725 W. Indian School Road, Suite D-101
28 Avondale, AZ 85392

Daniel Pozefsky
Chief Counsel
Residential Utility Consumer Office
1110 West Washington, Suite 220
Phoenix, AZ 85007

26 . . .

27 . . .

28

1 George E. Silva
2 Santa Cruz County Attorney
3 Charlene LaPlante, Deputy County Attorney
4 1250 N. Congress Drive, Suite 201
5 Nogales, AZ 85621

6 Arizona Reporting Services, Inc.
7 2200 N. Central Avenue, Suite 502
8 Phoenix, AZ 85004-1481

9 By 

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