

INTERVENTION



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ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

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MAR 19 2014

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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

BOB STUMP, Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

ORIGINAL

THE MATTER OF THE APPLICATION OF
JOHNSON UTILITIES, LLC, DOING
BUSINESS AS JOHNSON UTILITIES
COMPANY, FOR APPROVAL OF SALE AND
TRANSFER OF ASSETS AND
CONDITIONAL CANCELLATION OF ITS
CERTIFICATE OF CONVENIENCE AND
NECESSITY

Docket No. WS-02987A-13-0477

MOTION TO INTERVENE

Pursuant to Arizona Administrative Code section R14-3-105, Pulte Home Corporation (“Pulte”), moves to intervene and participate as a party in the above-titled proceeding.

Identity of Pulte Home Corporation

Pulte is a development and home building company that owns roughly 2000 acres of land in Pulte’s Merrill Ranch master planned community, a portion of which is located within Johnson Utilities, LLC’s (“Johnson’s”) water and sewer Certificates of Convenience and Necessity (“CC&N”) service areas in Pinal County.

Pulte will be Directly Affected by a Commission Decision in this Matter

Pulte will be directly and substantially affected by a proposed sale of Johnson’s assets and by the proposed cancellation of Johnson’s water and sewer CC&Ns. Pulte or its affiliate

1 companies are customers of Johnson for both water and sewer services. The application
2 proposes to sell assets used in Johnson's business to an entity that is not regulated by the
3 Commission. Pulte and Johnson have in place a number of executory line extension and master
4 facilities obligations that relate directly to the assets Johnson intends to sell.

5 Pulte takes no position at this time on whether a hearing ultimately should be held in this
6 matter, but has a significant interest in the matter and wishes to be admitted as a party.

7 **Intervention Will Not Unduly Broaden Issues or Delay Proceeding**

8 Johnson filed its application on December 31, 2013, and this application is submitted
9 before any proceedings, other than interventions and a procedural conference, have occurred in
10 this matter. Pulte's intervention as a party at the inception of this matter will not unduly broaden
11 the issues or delay the proceedings.

12 **Conclusion**

13 Pulte respectfully requests that the Commission issue an order (i) granting Pulte's request
14 for intervention in this case, and (ii) granting Pulte all rights and privileges as a party of record
15 herein.

16 RESPECTFULLY REQUESTED this 19th day of March, 2014.

17 RYLEY CARLOCK & APPLEWHITE

18
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25 ORIGINAL and 13 copies of the foregoing
26 filed this 19th day of March, 2014, with:

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Phoenix, Arizona 85007

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COPY of the foregoing mailed this
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