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Arizona Corporation Commission
DOCKETED
JUN 23 2015

6 Attorneys for Liberty Utilities (Black Mountain Sewer) Corp.
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8 **BEFORE THE ARIZONA CORPORATION COMMISSION**

9
10 IN THE MATTER OF THE APPLICATION
11 OF LIBERTY UTILITIES (BLACK
MOUNTAIN SEWER) CORP., AN
12 ARIZONA CORPORATION, FOR
13 AUTHORITY TO ISSUE EVIDENCE OF
INDEBTEDNESS IN AN AMOUNT NOT TO
EXCEED \$3,400,000.

DOCKET NO: SW-02361A-15-0206

MOTION TO CONSOLIDATE

14
15 Liberty Utilities (Black Mountain Sewer) Corp. ("Liberty Black Mountain" or
16 "Company") hereby moves to consolidate the above-captioned matter with the rate
17 application filed by Liberty Black Mountain in Docket No. SW-02361A-15-0207. Such
18 relief is warranted because the issues in the two dockets are inextricably linked.
19 The Company has used the debt subject to this financing application in its capital structure
20 in the rate application. In addition, consolidation will result in administrative efficiency
21 and economy as only one proceeding will be necessary to decide these interrelated
22 applications.

23 Publication/mailing of the Public Notice regarding the financing application is
24 currently due July 2, 2015. It would be preferable for the Company to send out one notice
25 advising Liberty Black Mountain customers of both proceedings at the same time. Thus,
26 new notice requirements should be addressed if the motion to consolidate is granted.

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Liberty Black Mountain asks that the Commission issue an order granting the request for consolidation.

RESPECTFULLY SUBMITTED this 23rd day of June, 2015.

SHAPIRO LAW FIRM, P.C.

By: _____
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and

LIBERTY UTILITIES

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Attorneys for Liberty Utilities
(Black Mountain Sewer) Corp.

ORIGINAL and thirteen (13) copies of the foregoing were delivered this 23rd day of June, 2015, to:

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

By: *J. Adwe*