



0000161491

1 Steve Wene, State Bar No. 019630  
2 MOYES SELLERS & HENDRICKS LTD.  
3 1850 N. Central Ave., Suite 1100  
4 Phoenix, Arizona 85004  
5 Telephone: 602-604-2141  
6 e-mail: swene@lawms.com

RECEIVED

2015 MAR 20 P 3: 34

AZ CORP COMMISSION  
DOCKET CONTROL

7 ORIGINAL

8 BEFORE THE ARIZONA CORPORATION COMMISSION

9 Arizona Corporation Commission

10 **COMMISSIONERS**

11 SUSAN BITTER SMITH, CHAIRMAN  
12 BOB STUMP  
13 BOB BURNS  
14 TOM FORESE  
15 DOUG LITTLE

DOCKETED

MAR 20 2015

DOCKETED BY 

16 IN THE MATTER OF THE APPLICATION  
17 OF GREENEHAVEN WATER COMPANY,  
18 INC. FOR AN INCREASE IN ITS RATES

DOCKET NO. W-0232<sup>5</sup>A-14-0322

**MOTION FOR EXTENTION OF  
TIME TO FILE RESPONSE TO  
STAFF REPORT**

19 Greenehaven Water Company, Inc. ("Company" or "Greenehaven") hereby moves  
20 for an extension of time to respond to the Staff Report in this matter. For the reasons  
21 explained below, the Company requests that the Court allow comments to be filed on or  
22 before April 7, 2015.

23  
24 The Staff Report was docketed on March 16, 2015. The Company received the  
25 Staff Report on March 19, 2015. Staff's memorandum indicates that the Company's  
26 comments to the Staff Report are due on March 26, 2015. This means Greenehaven's  
27 comments are due only five business days after the Company received the Staff Report,  
28

1 which is simply not enough time for the Company to fully analyze the report and draft a  
2 response.  
3

4 In addition to the brief time allocated to respond, the Company and its counsel  
5 have other work that must be performed during this same time. Grenehaven's  
6 comments to the Staff report in its ongoing sewer rate case will be drafted simultaneously  
7 with the response in this case. Further, on March 24, 2015 Company counsel has a post-  
8 hearing brief due in another contested case before the Commission (Utility Source,  
9 docket WS-042325A-13-0331). Clearly, with the short time allocated and the other work  
10 that must be performed during the same period, extending the due date to April 7, 2015 is  
11 fair and reasonable.  
12  
13

14 Finally, extending the deadline will not create a hardship for either Staff or the  
15 Court. Staff has no further work to be done in this matter unless it chooses to reply to  
16 Grenehaven's comments or the recommended opinion and order. The Company's  
17 counsel has informed Staff's counsel of this motion, and while Staff retains the right to  
18 comment further, the Company is not aware of any Staff concerns with the extension as  
19 requested. Grenehaven also reviewed the docket calendar and notes that the Court's  
20 recommended opinion and order is due on May 27, 2015. Hence, the requested extension  
21 still provides this Court with seven weeks to draft the recommended opinion and order.  
22  
23  
24

25 Therefore, Grenehaven respectfully moves the Court for an order extending the  
26 Company's deadline for filing a response to the Staff Report from March 26, 2015 to  
27 April 7, 2015.  
28

1 DATED this 20<sup>TH</sup> day of March, 2015.

2 **MOYES SELLERS & HENDRICKS**

3  
4   
5 \_\_\_\_\_  
6 Steve Wene

7 Original and 13 copies of the foregoing  
8 filed this 20<sup>th</sup> day of March, 2015, with:

9 Docket Control  
10 Arizona Corporation Commission  
11 1200 West Washington  
12 Phoenix, Arizona 85007

13   
14 \_\_\_\_\_  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28