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INTERVENTION



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Water Conservation District Number One

BEFORE THE ARIZONA CORPORATION COMMISSION

SUSAN BITTER SMITH, CHAIRMAN

BOB STUMP, COMMISSIONER

BOB BURNS, COMMISSIONER

DOUG LITTLE, COMMISSIONER

TOM FORESE, COMMISSIONER

Arizona Corporation Commission

DOCKETED

JUL 28 2015

DOCKETED BY *MLB*

IN THE MATTER OF THE APPLICATION
OF LIBERTY UTILITIES (LITCHFIELD
PARK WATER & SEWER) CORP. FOR A
CERTIFICATE OF CONVENIENCE AND
NECESSITY TO PROVIDE WASTEWATER
UTILITY SERVICE IN MARICOPA
COUNTY, ARIZONA.

Docket No.: SW-01428A-15-0259

**MARICOPA COUNTY MUNICIPAL
WATER CONSERVATION
DISTRICT NUMBER ONE'S
APPLICATION TO INTERVENE**

Pursuant to Rule 14-3-105 of the Rules of Practice and Procedure before the Corporation Commission, Maricopa County Municipal Water Conservation District Number One ("MWD"), respectfully moves to intervene in the above-captioned matter, Docket No. SW-01428A-15-0259.

1 MWD owns all of the land that is included within Liberty Utilities (Litchfield Park Water
2 & Sewer) Corp.'s ("Liberty") Application for Extension of Certificate of Convenience and
3 Necessity to be considered by the Commission in this docket. MWD has requested that Liberty
4 pursue an extension of Liberty's CC&N pursuant to a Master Utility Agreement between MWD
5 and Liberty. MWD will be directly and substantially affected by proposals of parties regarding
6 this application.

7 MWD's participation in this matter will not unduly broaden the issues nor unduly delay
8 this proceeding, which has just started. MWD takes no position at this time whether a hearing is
9 necessary in this matter, but if a hearing is held, then MWD may address through testimony or
10 other evidence and briefing the issues raised by any party.

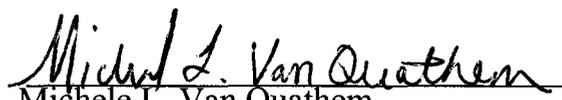
11 Communications to MWD should be directed to:

12 Michele Van Quathem
13 Sheryl A. Sweeney
14 Ryley Carlock & Applewhite
15 One N. Central Ave., Suite 1200
16 Phoenix, Arizona 85004
17 mvq@rcalaw.com
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20 MWD respectfully requests that the Commission issue an order granting MWD
21 intervention as a fully participating party in the above-captioned matter.

22 DATED this 28th day of July, 2015.

23 **RYLEY CARLOCK & APPLEWHITE**

24 
25 Michele L. Van Quathem
26 Sheryl A. Sweeney
27 One North Central Avenue, Suite 1200
28 Phoenix, AZ 85004-4417
Attorneys for Maricopa County Municipal
Water Conservation District Number One

1 **ORIGINAL** of the foregoing
filed this 28th day of July, 2015 with:

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

5 **COPY** of the foregoing hand delivered
6 this 28th day of July, 2015 to:

7 Sasha Paternoster, ALJ
Hearing Division
8 Arizona Corporation Commission
1200 W. Washington Street
9 Phoenix, Arizona 85007

Steve Olea, Director
Utilities Division
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10 Robin Mitchell
11 Wes Van Cleve
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12 Arizona Corporation Commission
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13 Phoenix, Arizona 85007

14 **COPY** of the foregoing mailed
15 this 28th day of July, 2015 to:

16 Todd C. Wiley
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17 12725 W. Indian School Rd., Suite D-101
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