

ORIGINAL INTERVENTION



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RYLEY CARLOCK & APPLEWHITE
One North Central Avenue, Suite 1200
Phoenix, AZ 85004-4417
Telephone 602-440-4800
Fax 602-257-9582

Arizona Corporation Commission

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SEP 30 2015

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Michele L. Van Quathem (Bar No. 19185)
mvq@rcalaw.com
Attorneys for Abbott Laboratories

BEFORE THE ARIZONA CORPORATION COMMISSION

SUSAN BITTER SMITH, CHAIRMAN
BOB STUMP, COMMISSIONER
BOB BURNS, COMMISSIONER
DOUG LITTLE, COMMISSIONER
TOM FORESE, COMMISSIONER

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AZ CORP COMMISSION
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IN THE MATTER OF THE APPLICATION
OF ARIZONA WATER COMPANY, AN
ARIZONA CORPORATION, FOR A
DETERMINATION OF THE FAIR VALUE
OF ITS UTILITY PLANT AND PROPERTY,
AND FOR ADJUSTMENTS TO ITS RATES
AND CHARGES FOR UTILITY SERVICE
FURNISHED BY ITS WESTERN GROUP
AND FOR CERTAIN RELATED
APPROVALS.

Docket No.: W-01445A-15-0277

ABBOTT LABORATORIES'
APPLICATION TO INTERVENE

Abbott Laboratories, an Illinois corporation registered to do business in Arizona (referred to herein as "Abbott"), pursuant to Rule 14-3-105 of the Rules of Practice and Procedure before the Commission, respectfully moves to intervene in the above-captioned matter, Docket No. W-01445A-15-0277. In support of this application, Abbott states:

1. The Abbott Nutrition division of Abbott operates a manufacturing plant located on the west side of Casa Grande, Arizona, within Arizona Water Company's Certificate of Convenience and Necessity in sections 13 and 24, Township 6 South, Range 5 East, GSRB&M. The plant manufactures a variety of adult and infant nutritional products for distribution mainly in the western United States. The plant employs approximately 350

1 employees and operates 24 hours, 7 days per week, 365 days per year. Upon information and
2 belief, the plant is the largest user in Arizona Water Company's Pinal Valley system.

3 2. Abbott is directly and substantially affected by the rate changes to be
4 considered in this matter. The quantity, quality, and cost of water are key factors affecting
5 Abbott's manufacturing operations.

6 3. Abbott's participation in this case as a ratepayer will not unduly broaden the
7 issues considered by the Commission as Arizona Water Company's rates and related tariff
8 conditions are squarely at issue in this case.

9 4. Communications to Abbott should be directed to:

10 Michele Van Quathem
11 Ryley Carlock & Applewhite
12 One N. Central Ave., Suite 1200
13 Phoenix, Arizona 85004
mvq@rcalaw.com
602-440-4800

14 For the reasons stated above, Abbott respectfully requests that the Commission issue
15 an order granting Abbott intervention as a fully participating party in the above-captioned
16 matter.

17 DATED this 30th day of September, 2015.

18 **RYLEY CARLOCK & APPLEWHITE**

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20 _____
21 Michele L. Van Quathem
22 One North Central Avenue, Suite 1200
23 Phoenix, AZ 85004-4417
24 Attorneys for Abbott Laboratories
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1 **ORIGINAL** and 13 copies of the
2 foregoing filed this 30th day of
September, 2015 with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 W. Washington Street
Phoenix, AZ 85007

6 **COPY** of the foregoing hand delivered
7 this 30th day of September, 2015 to:

8 Sarah Harpring, ALJ
9 Hearing Division
10 Arizona Corporation Commission
11 1200 W. Washington Street
12 Phoenix, Arizona 85007

Thomas Broderick, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

13 Wes Van Cleve
14 Brian E. Smith
15 Legal Division
16 Arizona Corporation Commission
17 1200 W. Washington Street
18 Phoenix, Arizona 85007

19 **COPY** of the foregoing mailed
20 this 30th day of September, 2015 to:

21 E. Robert Spear
22 General Counsel
23 Arizona Water Company
24 P.O. Box 29006
25 Phoenix, Arizona 85038-9006

Steven A. Hirsch
Coree E. Neumeyer
Byan Cave LLP
Two North Central Ave., Suite 2200
Phoenix, Arizona 85004

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