

ORIGINAL

INTERVENTION



0000164669

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

SUSAN BITIER SMITH - Chairman  
BOB STUMP  
BOB BURNS  
DOUG LITTLE  
TOM FORESE

Arizona Corporation Commission

DOCKETED

SEP 23 2015

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AZ CORP COMMISSION  
DOCKET CONTROL

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

DOCKET NO. SW-02361A-15-0206

IN THE MATTER OF THE APPLICATION OF LIBERTY UTILITIES (BLACK MOUNTAIN SEWER) CORP., AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE FAIR VALUE OF ITS UTILITY PLANTS AND PROPERTY AND FOR INCREASES IN ITS WASTEWATER RATES AN CHARGES FOR UTILITY SERVICE BASED THEREON.

DOCKET NO. SW-02361A-15-0207

TOWN OF CAREFREE'S APPLICATION FOR LEAVE TO INTERVENE

The Town of Carefree (the "Town"), pursuant to A.A.C. R14-3-105 and the Procedural Order date August 19, 2015 in this matter, hereby petitions the Arizona Corporation Commission ("Commission") for an order allowing the Town to intervene in the above-captioned proceeding. In support of its motion, the Town states as follows:

1. The Town is a customer of Liberty Utilities (Black Mountain Sewer) Corp. ("Liberty") and will be directly and substantially affected by the wastewater rates charged by Liberty to the Town.

2. The Town also has a direct and substantial interest in ensuring that its

1 residents are provided quality utility services for a reasonable price.

2 3. The granting of intervenor status to the Town will not delay this proceeding  
3 or cause the issues to be unduly broadened, nor will it unduly prejudice Liberty or any  
4 other interested parties.

5 4. Service of all correspondence, documents or pleadings should be made to:

6 Scott S. Wakefield, Esq.  
7 Ridenour Hienton, P.L.L.C.  
8 201 North Central Avenue, Suite 3300  
9 Phoenix, Arizona 85004-1052  
10 Phone: 602-254-9900  
11 Fax: 602-254-8670  
12 Email: [swakefield@rhlfirm.com](mailto:swakefield@rhlfirm.com)

13 Michael W. Wright, Esq.  
14 Sherman & Howard, LLC  
15 7033 East Greenway Parkway, Suite 250  
16 Scottsdale, Arizona 85254-8110  
17 Phone: 480-624-2722  
18 Fax: 480-624-2029  
19 Email: [mwright@shermanhoward.com](mailto:mwright@shermanhoward.com)

20 Gary S. Neiss, Town Administrator  
21 Town of Carefree  
22 100 Easy Street  
23 P.O. Box 740  
24 Carefree, Arizona 85377  
25 Email: [gary@carefree.org](mailto:gary@carefree.org)

26 ///

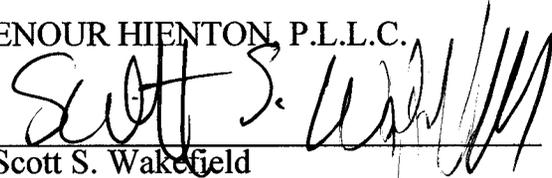
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1           WHEREFORE, based upon the foregoing reasons, the Town respectfully requests  
2 that the presiding Administrative Law Judge issue an order granting the Town  
3 intervention in this matter.

4           Dated this 23rd day of September, 2015.

5           RIDENOUR HIENTON, P.L.L.C.

6  
7 By 

8           Scott S. Wakefield  
9           201 North Central Avenue, Suite 3300  
10           Phoenix, Arizona 85004-1052  
11           Attorneys for Town of Carefree

12 ORIGINAL and 13 copies filed  
13 this 23rd day of September,  
14 2015 with:

15 Docket Control  
16 Arizona Corporation Commission  
17 1200 W. Washington Street  
18 Phoenix, AZ 85007

19 COPY of the foregoing HAND-  
20 DELIVERED this 23rd day of  
21 September, 2015 to:

22 Dwight Nodes  
23 Chief Administrative Law Judge  
24 Hearing Division  
25 Arizona Corporation Commission  
26 1200 West Washington Street  
Phoenix, Arizona 85007

Janice M. Alward, Chief Counsel  
Robin Mitchell  
Wes Van Cleve  
Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

1 Thomas M. Broderick, Director  
2 Utilities Division  
3 Arizona Corporation Commission  
4 1200 West Washington Street  
5 Phoenix, Arizona 85007

6 COPY of the foregoing MAILED  
7 this 23rd day of September, 2015 to:

8 Jay L. Shapiro  
9 Shapiro Law Firm, P.C.  
10 1819 E. Morten Avenue, Suite 280  
11 Phoenix, AZ 85020  
12 Attorney for Liberty Utilities

13 Todd C. Wiley  
14 Liberty Utilities  
15 12725 W. Indian School Road, Suite D-101  
16 Avondale, AZ 85392

17 Daniel W. Pozefsky  
18 Chief Counsel  
19 Residential Utility Consumer Office  
20 1110 W. Washington, Suite 220  
21 Phoenix, AZ 85007

22 Michele L. Van Quathem  
23 Tyley Carlock & Applewhite  
24 One Central Avenue, Suite 1200  
25 Phoenix, AZ 85004-4417  
26 Attorney for CP Boulders, LLC

*Jennette Golder*