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2015 NOV -3 P 2:51

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8 **BEFORE THE ARIZONA CORPORATION COMMISSION**

9
10 IN THE MATTER OF THE APPLICATION
11 OF LIBERTY UTILITIES (BELLA VISTA
12 WATER) CORP., AN ARIZONA
CORPORATION, FOR AUTHORITY TO
13 ISSUE EVIDENCE OF INDEBTEDNESS IN
AN AMOUNT NOT TO EXCEED
14 \$4,700,000.

DOCKET NO: W-02465A-15-0370

MOTION TO CONSOLIDATE

15 Liberty Utilities (Bella Vista Water) Corp. ("Liberty Bella Vista") hereby files this
16 Motion to Consolidate the above-captioned matter with the rate application filed by
17 Liberty Bella Vista, Docket No. W-02465A-15-0367, the rate application filed by Liberty
18 Utilities (Rio Rico Water & Sewer) Corp. ("Liberty Rio Rico"), Docket No. WS-02676A-
19 15-0368, and the financing application filed by Liberty Rio Rico, Docket No. WS-
20 02676A-15-0371.¹

21 Liberty Bella Vista and Liberty Rio Rico (collectively, "Applicants") are both
22 operated by Liberty Utilities. In addition, both of the Applicants are requesting that the
23 Commission approve the Fair Value Arizona Rate Evaluation model or FARE. This is
24 another compelling reason to consolidate the two rate applications and process them in
25

26 ¹ A similar motion has been filed in each of the dockets subject to this request for consolidation.

1 parallel in one proceeding.

2 Moreover, consolidation of the above-referenced rate proceedings with the two
3 financing dockets is also warranted because the issues are inextricably linked. Applicants
4 have used the debt subject to their financing applications in their capital structures in the
5 rate applications, and a capital structure with debt is more balanced than a capital structure
6 without the debt. In addition, consolidation would result in administrative efficiency and
7 administrative economy as only one proceeding will be necessary to decide four separate
8 but interrelated applications.

9 Publication/mailing of the public notices regarding Applicants' financing
10 applications are currently due November 12, 2015. It would be preferable for Applicants
11 to send out one notice, advising all of Applicants' customers of all proceedings at the
12 same time. Thus, Applicants further request that new notice requirements be addressed if
13 this motion to consolidate is granted.

14 Based on the foregoing, Liberty Bella Vista asks that the Commission issue an
15 order granting the request for consolidation of its rate application with its financing
16 application, and granting consolidation of Liberty Bella Vista's rate and financing
17 applications with the rate and financing applications filed concurrently by Liberty Rio
18 Rico.

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RESPECTFULLY SUBMITTED this 3rd day of November, 2015.

SHAPIRO LAW FIRM, P.C.

By: 
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and

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ORIGINAL and thirteen (13) copies
of the foregoing were delivered
this 3rd day of November, 2015, to:

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

By: 