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8 **BEFORE THE ARIZONA CORPORATION COMMISSION**

9  
10 IN THE MATTER OF THE APPLICATION  
11 OF LIBERTY UTILITIES (RIO RICO  
WATER & SEWER) CORP., AN ARIZONA  
12 CORPORATION, FOR A  
13 DETERMINATION OF THE FAIR VALUE  
OF ITS UTILITY PLANTS AND  
14 PROPERTY AND FOR INCREASES IN ITS  
WATER AND WASTEWATER RATES  
AND CHARGES FOR UTILITY SERVICE  
15 BASED THEREON.

DOCKET NO: WS-02676A-15-0368

**MOTION TO CONSOLIDATE**

16 Liberty Utilities (Rio Rico Water & Sewer) Corp. ("Liberty Rio Rico") hereby files  
17 this Motion to Consolidate the above-captioned matter with the financing application filed  
18 by Liberty Rio Rico, Docket No. WS-02676A-15-0371, the rate application filed by  
19 Liberty Utilities (Bella Vista Water) Corp. ("Liberty Bella Vista"), Docket No. W-  
20 02465A-15-0367, and the financing application filed by Liberty Bella Vista, Docket No.  
21 W-02465A-15-0370.<sup>1</sup>

22 Liberty Bella Vista and Liberty Rio Rico (collectively, "Applicants") are both  
23 operated by Liberty Utilities. In addition, both of the Applicants are requesting that the  
24 Commission approve the Fair Value Arizona Rate Evaluation model or FARE. This is

25  
26 <sup>1</sup> A similar motion has been filed in each of the dockets subject to this request for consolidation.

1 another compelling reason to consolidate the two rate applications and process them in  
2 parallel in one proceeding.

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

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

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

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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: Whitney Burk