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Attorneys for Liberty Utilities (Bella Vista Water) Corp.

BEFORE THE ARIZONA CORPORATION COMMISSION

10 IN THE MATTER OF THE APPLICATION  
11 OF LIBERTY UTILITIES (BELLA VISTA  
12 WATER) CORP., AN ARIZONA  
13 CORPORATION, FOR A  
14 DETERMINATION OF THE FAIR VALUE  
15 OF ITS UTILITY PLANTS AND  
16 PROPERTY AND FOR INCREASES IN ITS  
17 WATER RATES AND CHARGES FOR  
18 UTILITY SERVICE BASED THEREON.

DOCKET NO: W-02465A-15-0367

MOTION TO CONSOLIDATE

16 Liberty Utilities (Bella Vista Water) Corp. ("Liberty Bella Vista") hereby files this  
17 Motion to Consolidate the above-captioned matter with the financing application filed by  
18 Liberty Bella Vista, Docket No. W-02465A-15-0370, the rate application filed by Liberty  
19 Utilities (Rio Rico Water & Sewer) Corp. ("Liberty Rio Rico"), Docket No. WS-02676A-  
20 15-0368, and the financing application filed by Liberty Rio Rico, Docket No. WS-  
21 02676A-15-0371.<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

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

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RESPECTFULLY SUBMITTED this 3rd day of November, 2015.

SHAPIRO LAW FIRM, P.C.

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and

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ORIGINAL and thirteen (13) copies  
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