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AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
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4 LIBERTY UTILITIES
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DOCKETED BY *TC*

6 Attorneys for Liberty Utilities (Rio Rico Water & Sewer) Corp.
7

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 AUTHORITY TO
ISSUE EVIDENCE OF INDEBTEDNESS IN
13 AN AMOUNT NOT TO EXCEED
\$8,900,000.

DOCKET NO: WS-02676A-15-0371

MOTION TO CONSOLIDATE

14
15 Liberty Utilities (Rio Rico Water & Sewer) Corp. ("Liberty Rio Rico") hereby files
16 this Motion to Consolidate the above-captioned matter with the rate application filed by
17 Liberty Rio Rico, Docket No. WS-02676A-15-0368, the rate application filed by Liberty
18 Utilities (Bella Vista Water) Corp. ("Liberty Bella Vista"), Docket No. W-02465A-15-
19 0367, and the financing application filed by Liberty Bella Vista, W-02465A-15-0370.¹

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

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

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

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

13 Based on the foregoing, Liberty Rio Rico asks that the Commission issue an order
14 granting the request for consolidation of its rate application with its financing application,
15 and granting consolidation of Liberty Rio Rico's rate and financing applications with the
16 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

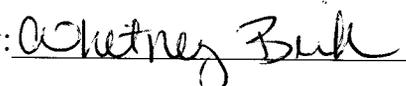
LIBERTY UTILITIES

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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 Bull