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10 Attorneys for Liberty Utilities (Entrada Del Oro Sewer) Corp.

11 **BEFORE THE ARIZONA CORPORATION COMMISSION**

12 IN THE MATTER OF THE APPLICATION
13 OF LIBERTY UTILITIES (ENTRADA DEL
14 ORO SEWER) CORP., AN ARIZONA
15 CORPORATION, FOR A
16 DETERMINATION OF THE FAIR VALUE
17 OF ITS UTILITY PLANTS AND
18 PROPERTY AND FOR INCREASES IN ITS
19 WASTEWATER RATES AND CHARGES
20 FOR UTILITY SERVICE BASED
21 THEREON.

DOCKET NO: SW-04316A-16-0078

MOTION TO CONSOLIDATE

22 Liberty Utilities (Entrada Del Oro Sewer) Corp. ("Liberty EDO" or "Company")
23 hereby files this Motion to Consolidate the above-captioned matter with the Application
24 filed by Liberty EDO in Docket No. SW-04316A-16-0085. Such relief is warranted
25 because the issues in the two dockets are inextricably linked. The Company has used the
26 debt subject to the financing application in its capital structure in the rate application, and
a capital structure with debt is more balanced than a capital structure without the debt.
In addition, consolidation would result in administrative efficiency and administrative
economy as only one proceeding will be necessary to decide two separate but interrelated
applications.

Publication/mailing of the public notice regarding the financing application is
currently due March 17, 2016. It would be preferable for the Company to send out one

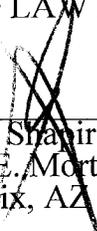
1 notice, advising Liberty EDO customers of both proceedings at the same time. Thus, the
2 Company further requests that new notice requirements be addressed if this motion to
3 consolidate is granted.

4 Based upon the foregoing, Liberty EDO asks that the Commission issue an order
5 granting the request for consolidation of its rate application with its financing application

6 RESPECTFULLY SUBMITTED this 9th day of March, 2016.

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ORIGINAL and thirteen (13) copies
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Docket Control
Arizona Corporation Commission
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COPY of the foregoing was hand-delivered
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Sasha Paternoster, ALJ
Hearing Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

1 Robin Mitchell
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By: Whitney Zink