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BEFORE THE ARIZONA CORPORATION COMMISSION

8 IN THE MATTER OF THE APPLICATION
 9 OF PIMA UTILITY COMPANY, AN
 10 ARIZONA CORPORATION, FOR
 11 AUTHORITY TO (1) ISSUE EVIDENCE OF
 12 INDEBTEDNESS IN AN AMOUNT NOT TO
 EXCEED \$8,370,000; AND (2) ENCUMBER
 REAL PROPERTY AND PLANT AS
 SECURITY FOR SUCH INDEBTEDNESS.

DOCKET NO: W-02199A-16-0381

MOTION TO CONSOLIDATE

13 Pima Utility Company ("Pima" or "Company") hereby files this Motion to
 14 Consolidate the above-captioned matter with the Financing Application filed in Docket
 15 No. SW-02199A-16-0380.

16 Such relief is appropriate and will conserve judicial resources because both
 17 financing applications are for the same company. Pima's water and wastewater customer
 18 bases are largely the same, and Pima is operated and managed as one utility. The facts
 19 giving rise to these two financing applications and the legal issues presented therein are
 20 identical. The new debt being sought will be used to replace existing debt and fund
 21 infrastructure improvements for both the water and wastewater divisions of the Company.
 22 Because these matters are inextricably linked, consolidation is consistent with the interests
 23 of administrative efficiency and administrative economy.

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RESPECTFULLY SUBMITTED this 21st day of October, 2016.

SHAPIRO LAW FIRM, P.C.

By: _____


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ORIGINAL and thirteen (13) copies
of the foregoing were delivered
this 21st day of October, 2016, to:

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

COPY of the foregoing was hand-delivered
this 21st day of October, 2016, to:

Janice Alward, Legal Division Director
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Thomas Broderick, Director
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By: Whitney Burk