

**ORIGINAL INTERVENTION**



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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION  
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Arizona Corporation Commission

**DOCKETED**

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7  
8 IN THE MATTER OF THE APPLICATION OF  
9 LIBERTY UTILITIES (LITCHFIELD PARK  
10 WATER & SEWER) CORP., AN ARIZONA  
11 CORPORATION, FOR A DETERMINATION  
12 OF THE FAIR VALUE OF ITS UTILITY  
13 PLANTS AND PROPERTY AND FOR  
14 INCREASES IN ITS WATER RATES AND  
15 CHARGES FOR UTILITY SERVICE BASED  
16 THEREON.

Docket No. W-01427A-17-0059

**RUCO'S APPLICATION TO INTERVENE**

I.

15 The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the  
16 Arizona Corporation Commission ("Commission") for an Order granting it leave to intervene in  
17 the above-captioned proceeding.

II.

19 RUCO was established by the enactment of Arizona Revised Statutes, Section 40-461,  
20 *et seq.*, for the purpose of representing residential utility consumers in matters before the  
21 Commission concerning regulated public service corporations.

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1 III.

2 Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director of  
3 RUCO may do the following:

4 Prepare and present briefs, arguments, proposed rates or orders  
5 and intervene or appear on behalf of residential utility consumers  
6 before hearing officers and the Corporation Commission as a party  
7 in interest and also participate as a party in interest pursuant to  
8 Section 40-254 in proceedings relating to rate making or rate  
9 design and involving public service corporations.

8 IV.

9 The residential utility consumers will be directly and substantially affected by a Decision  
10 or Order of the Commission in this matter, therefore, it is necessary and proper that RUCO  
11 intervene in the proceeding.

12 V.

13 In order to fulfill its statutory obligation to protect the residential utility consumers of this  
14 State, RUCO must thoroughly examine the materials presented by the Company, and must  
15 cross-examine witnesses appearing on behalf of the Company and any other parties.  
16 Additionally, RUCO may present testimony and exhibits of its own in any hearings conducted  
17 by the Commission in this matter.

18 VI.

19 The name, mailing address, and telephone number of the person upon whom service of  
20 all documents is to be made is,

21 Daniel Pozefsky, Chief Counsel  
22 Residential Utility Consumer Office  
23 1110 W. Washington, Suite 220  
24 Phoenix, Arizona 85007  
(602) 364-4839

1 RESPECTFULLY SUBMITTED this 20th day of March, 2017.

2  
3   
4 Daniel W. Pozefsky  
5 Chief Counsel

6 AN ORIGINAL AND THIRTEEN COPIES  
7 of the foregoing filed this 20th day  
8 of March, 2017 with:

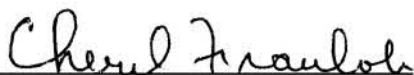
9 Docket Control  
10 Arizona Corporation Commission  
11 1200 West Washington  
12 Phoenix, Arizona 85007

13 COPIES of the foregoing hand delivered/  
14 mailed this 20th day of March, 2017 to:

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By   
Cheryl Fraulob