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8

Arizona Corporation Commission

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9 **BEFORE THE ARIZONA CORPORATION COMMISSION**

10
11 IN THE MATTER OF THE APPLICATION
OF LIBERTY UTILITIES (LITCHFIELD
12 PARK WATER & SEWER) CORP., AN
ARIZONA CORPORATION, FOR
13 AUTHORITY TO (1) ISSUE EVIDENCE OF
INDEBTEDNESS IN AN AMOUNT NOT TO
14 EXCEED \$30,000,000; AND (2)
ENCUMBER ITS REAL PROPERTY AND
15 PLANT AS SECURITY FOR SUCH
INDEBTEDNESS.

DOCKET NO: W-01427A-17-0077

MOTION TO CONSOLIDATE

16
17 Liberty Utilities (Litchfield Park Water & Sewer) Corp. ("Liberty Litchfield Park"
18 or "Company") hereby files this Motion to Consolidate the above-captioned matter with
19 the financing application filed by the Company in Docket No. SW-01428A-17-0078, and
20 the rate applications filed by the Company in Docket Nos. SW-01428A-17-0058 and W-
21 01427A-17-0059.¹

22 Consolidation of the above-referenced rate proceedings and financing dockets is
23 warranted because the issues are inextricably linked. Liberty Litchfield Park has used the
24 debt subject to its financing applications in the capital structures in the rate applications,
25

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

1 and a capital structure with debt is more balanced than a capital structure without the debt.
2 In addition, consolidation would result in administrative efficiency and administrative
3 economy as only one proceeding will be necessary to decide four separate but interrelated
4 applications.

5 Publication/mailing of the public notices regarding the Company's financing
6 applications are currently due March 27, 2017. It would be preferable for the Company to
7 send out one notice, advising the customers of all proceedings at the same time. Thus, the
8 Company further requests that new notice requirements be addressed if this motion to
9 consolidate is granted.

10 Based on the foregoing, Liberty Litchfield Park asks that the Commission issue an
11 order granting the request for consolidation of its rate applications with its financing
12 applications.

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

14 SHAPIRO LAW FIRM, P.C.

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(Litchfield Park Water & Sewer) Corp.

1 ORIGINAL and thirteen (13) copies
2 of the foregoing were delivered
3 this 20th day of March, 2017, to:

3 Docket Control
4 Arizona Corporation Commission
5 1200 W. Washington Street
6 Phoenix, AZ 85007

5 COPY of the foregoing was hand-delivered
6 this 20th day of March, 2017:

7 Timothy La Sota, Acting Director
8 Legal Division
9 Arizona Corporation Commission
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10 Elijah Abinah, Acting Director
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13 By: Whitney Zilk

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