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1 SHAPIRO LAW FIRM, P.C.
Jay L. Shapiro (No. 014650)
2 1819 E. Morten Avenue, Suite 280
Phoenix, Arizona 85020
3 Telephone (602) 559-9575
Jay@shapslawaz.com

Arizona Corporation Commission

DOCKETED

4 LIBERTY UTILITIES
5 Todd C. Wiley (No. 015358)
12725 W. Indian School Road, Suite D-101
6 Avondale, Arizona 85392
Todd.Wiley@LibertyUtilities.com

MAR 20 2017

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GB

7 Attorneys for Liberty Utilities (Litchfield Park Water & Sewer) Corp.
8

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: SW-01428A-17-0078

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. W-01427A-17-0077, 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.

15
16 By: 
17 Jay L. Shapiro
18 1819 E. Morten Avenue, Suite 280
19 Phoenix, AZ 85020
20 Jay@shaplawaz.com

21 and

22 LIBERTY UTILITIES

23 Todd C. Wiley
24 General Counsel (West Region)
25 12725 W. Indian School Road, Suite D-101
26 Avondale, AZ 85392
Todd.Wiley@LibertyUtilities.com

Attorneys for Liberty Utilities
(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
10 1200 W. Washington Street
11 Phoenix, AZ 85007

10 Elijah Abinah, Acting Director
11 Utilities Division
12 Arizona Corporation Commission
13 1200 W. Washington Street
14 Phoenix, AZ 85007

13 By: Whitney Sub

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