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MAR 20 2017

DOCKETED BY
GR

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

DOCKET NO: SW-01428A-17-0058

MOTION TO CONSOLIDATE

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 rate application filed by the Company in Docket No. W-01427A-17-0059, and the
20 financing applications filed by the Company in Docket Nos. W-01427A-17-0077 and SW-
21 01428A-17-0078.¹

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
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19 and

20 LIBERTY UTILITIES

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(Litchfield Park Water & Sewer) Corp.

25
26

1 **ORIGINAL** and thirteen (13) copies
of the foregoing were filed
2 this 20th day of March, 2017, with:

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

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

7 Sasha Paternoster, ALJ
Hearing Division
8 Arizona Corporation Commission
1200 W. Washington Street
9 Phoenix, AZ 85007

10 **COPY** of the foregoing was emailed and hand-delivered
11 this 20th day of March, 2017, to:

12 Robin Mitchell
Brian Smith
13 Legal Division
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1200 W. Washington Street
14 Phoenix, AZ 85007
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16 **COPY** of the foregoing was emailed
17 this 20th day of March, 2017, to:

18 Timothy La Sota, Acting Director
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20 Phoenix, AZ 85007
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22 By: Whitney Bink
23
24
25
26