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

Arizona Corporation Commission

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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: W-01427A-17-0059

**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-17-0058, and the  
20 financing applications filed by the Company in Docket Nos. W-01427A-17-0077 and SW-  
21 01428A-17-0078.<sup>1</sup>

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 <sup>1</sup> 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.

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By: \_\_\_\_\_

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(Litchfield Park Water & Sewer) Corp.

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

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

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

7 Sasha Paternoster, ALJ  
8 Hearing Division  
9 Arizona Corporation Commission  
10 1200 W. Washington Street  
11 Phoenix, AZ 85007

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

12 Robin Mitchell  
13 Brian Smith  
14 Legal Division  
15 Arizona Corporation Commission  
16 1200 W. Washington Street  
17 Phoenix, AZ 85007  
18 rmittell@azcc.gov  
19 besmith@azcc.gov

16 **COPY** of the foregoing was emailed  
17 this 20th day of March, 2017, to:

18 Timothy La Sota, Acting Director  
19 Legal Division  
20 Arizona Corporation Commission  
21 1200 W. Washington Street  
22 Phoenix, AZ 85007  
23 LegalDiv@azcc.gov  
24 EAbinah@azcc.gov

22 By: 

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24  
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