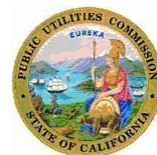


**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

6-25-15
04:59 PM

Joint Application of Liberty Utilities Co., Liberty WWH, Inc., Western Water Holdings, LLC, Park Water Company (U 314 W), and Apple Valley Ranchos Water Company (U-346-W) for Authority for Liberty Utilities Co. to Acquire and Control Park Water Company and Apple Valley Ranchos Water Company.

Application No. 14-11-013
(Filed November 24, 2014)

STATUS UPDATE OF THE TOWN OF APPLE VALLEY

Jason Ackerman, Esq.
Best Best & Krieger LLP
3390 University Avenue, 5th Floor
Riverside, CA 92501
Telephone: (951) 686-1450
Facsimile: (951) 686-3083
E-mail: jason.ackerman@bbklaw.com

Attorneys for TOWN OF APPLE VALLEY

June 24, 2015

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Joint Application of Liberty Utilities Co., Liberty WWH, Inc., Western Water Holdings, LLC, Park Water Company (U 314 W), and Apple Valley Ranchos Water Company (U-346-W) for Authority for Liberty Utilities Co. to Acquire and Control Park Water Company and Apple Valley Ranchos Water Company.

Application No. 14-11-013
(Filed November 24, 2014)

STATUS UPDATE OF THE TOWN OF APPLE VALLEY

In accordance with the Commission's Rules of Practice and Procedure, the Town of Apple Valley (Town) submits this Status Report in compliance with the ruling of Administrative Law Judge (ALJ) Kim that was delivered to the parties in this proceeding via electronic mail on June 22, 2015 (Email Ruling).

I. THE TOWN'S POSITION ON THE QUESTIONS PRESENTED

As directed by the Email Ruling, the Town states its position on each of the questions presented.

A. Did the proposed Settlement Agreement resolve all three issues outlined in Section 2 of the Scoping Memo Ruling dated April 27, 2015 (Scoping Memo Ruling)? If so, explain.

The Town does not concede that all three issues outlined in Section 2 of the Scoping Memo Ruling are resolved by the Settlement Agreement. The Town received limited responses to its data requests and it cannot ascertain whether or not the issues have been resolved by the Settlement Agreement. However, the Town does not have adequate resources to assist in resolving the issues outlined in the Scoping Memo Ruling and, therefore, it requests taking the evidentiary hearings off calendar. The Town reserves the right to comment on the Settlement Agreement pursuant to Rules of Practice and Procedure, Rule 12.2.

B. Are there any remaining contested issues of material facts requiring an evidentiary hearing because they were not resolved by the Settlement Agreement? If so, explain.

The Town received limited responses to its data requests and it cannot ascertain whether or not there remain contested issues of material fact that have not been resolved by the Settlement Agreement. To the extent that contested issues of material fact exist, the Town does not have adequate resources to contest the factual issues and, therefore, it requests taking the evidentiary hearings off calendar. The Town reserves the right to comment on the Settlement Agreement pursuant to Rules of Practice and Procedure, Rule 12.2.

C. Are there any remaining contested legal issues requiring a briefing schedule because those issues were not resolved by the Settlement Agreement? If so, explain.

The Town received limited responses to its data requests and it cannot ascertain whether or not there remain contested legal issues that require a briefing schedule. To the extent that contested legal issues exist, the Town does not have adequate resources to contest the issues and, therefore, no briefing schedule is requested. The Town reserves the right to comment on the Settlement Agreement pursuant to Rules of Practice and Procedure, Rule 12.2.

II. CONCLUSION

Based on this Status Report, the Town respectfully requests that ALJ Kim and the Commission take off calendar the evidentiary hearings currently scheduled for July 1-2, 2015, and consider the Town's comments on the Settlement Agreement.

DATED: June 24, 2015

Respectfully submitted,

/s/ Jason M. Ackerman

JASON M. ACKERMAN
Attorneys for Town of Apple Valley

Best Best & Krieger LLP
3390 University Avenue, 5th Floor
Riverside, CA 92501
Telephone: (951) 686-1450
Facsimile: (951) 686-3083
E-mail: jason.ackerman@bbklaw.com