



Ar

0000011669

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Thomas K. Irvine, Bar No. 006365  
Ellen M. Van Riper, Bar No. 011751  
IRVINE VAN RIPER, P.A.  
1419 North Third Street, Suite 100  
Phoenix, Arizona 85004  
(602) 230-8080

Attorneys for City of Casa Grande

RECEIVED

AUG 23 2000

2000 AUG 23 P 4:43

|             |    |
|-------------|----|
| DOCKETED BY | Jm |
|-------------|----|

AZ CORP COMMISSION  
DOCUMENT CONTROL

**BEFORE THE ARIZONA CORPORATION COMMISSION**

IN THE MATTER OF FILING BY  
ARIZONA WATER COMPANY OF  
PROPOSED TARIFF NO. TE-264,  
TREATED EFFLUENT SERVICE.

DOCKET NO. W-01445A-00-0319  
**RESPONSE TO AUGUST 8, 2000,  
STAFF REPORT**

Pursuant to the Commission's July 11, 2000, Procedural Order, the City of Casa Grande ("City") submits the following Response to the Staff Report dated August 8, 2000 ("Staff Report").

The City generally concurs with the Staff Report. Accordingly, the City urges the Commission to adopt the Staff Report's recommendation that Proposed Tariff TE-264 be denied.

The City specifically agrees with the Staff Report's conclusion that Arizona Water Company's ("AWC") Certificate of Convenience and Necessity ("CCN") does not encompass service of treated effluent. See Staff Report at 2. The City believes this finding supports the relief requested of the Commission by the City's Complaint in Docket No. W-01445A-00-0391. Based on the Staff Report, in addition to denying the Proposed Tariff, the Commission should enter an Order:

1. Declaring that AWC may not serve treated effluent within the Casa Grande Service area; or
2. Declaring that AWC may not serve effluent within the Casa Grande service area unless and until AWC's entire rate design for the Casa Grande service area is presented to the Commission in the context of a rate case where all impacts of effluent service can be thoroughly examined and the impact on potable water customers fully mitigated; and

