

INTERVENTION
Arizona Corporation Com
DOCKETE



0000011680

1 Carl J. Kunasek
Chairman
2 Jim Irvin
Commissioner
3 William A. Mundell
Commissioner
4

JUN 01 2000

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AZ CORP COMMISSION
DOCUMENT CONTROL

ARIZONA CORPORATION COMMISSION

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

W-01445A-00-0319

MOTION TO INTERVENE

12 The City of Casa Grande (Casa Grande) hereby moves to intervene in this matter
13 for the following reasons:

- 14 1. Casa Grande is both the local government speaking for the citizens of the city and
15 a customer of Arizona Water Company (AWC). This motion is filed in both
16 capacities.
- 17 2. AWC's proposed effluent tariff may have a tremendous impact on the community,
18 the city is therefore an appropriate party to this proceeding.
- 19 3. As explained in the Objection to Effluent Tariff filed by Casa Grande, AWC's
20 certificate of convenience and necessity does not apply to effluent.
- 21 4. AWC's "tariff" concerning effluent is nothing other than an end run around the
22 issues that have been presented to the Commission in the context of Reliant
23 Energy. It is not appropriate to hide a major issue as a routine "tariff." Specifically,
24 since AWC will apparently seek effluent from others (it has no sewer business), is
25 there ANY chance that a shortage in effluent supply will result in groundwater or
26 CAP water being substituted for effluent. If so, what is the impact on existing and
27 future potable water customers. Prior to consideration of any "tariff," these issues
28 need to be examined.
5. Any consideration of the proposed tariff, if the Commission were to conclude that

1 the CC & N applies to effluent, would require examination of AWC's entire rate
2 design for Casa Grande in the context of a rate case. Casa Grande requests that
3 this proposed "tariff" be sent to the Hearing Division for the entry of a procedural
4 order followed by proper hearings.

- 5 6. The proposed tariff does not contain guarantees that AWC's potable water
6 customers will never be charged for any expense related to the service of effluent.
7 The Arizona Department of Environmental Quality regulates effluent which requires
8 a completely separate delivery system, inspections, licenses, etc. All such
9 expenses, and the administrative burden, must not impact the users of potable
10 water.

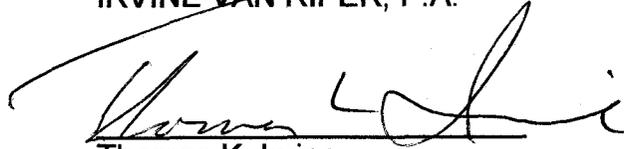
11 The City of Casa Grande is a proper party intervenor as it seeks to protect the
12 public health and economic future of its citizens.

13 Casa Grande moves for a waiver of any time limits that might make this Motion
14 invalid. AWC did not directly serve the City with the proposed tariff.

15 The City of Casa Grande respectfully requests that it be allowed to intervene.

16 RESPECTFULLY SUBMITTED this 1st day of June, 2000.

17 IRVINE VAN RIPER, P.A.

18 

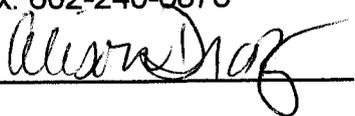
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23 Attorneys for the City of Casa Grande
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1 ORIGINAL and 25 copies filed this 1st day
2 of June, 2000, with the Director of the Utilities
3 Division of the Arizona Corporation Commission
4 by filing the same with Docket Control.

5 COPY faxed and mailed this
6 1st day of June, 2000,
7 to:

8 James R. Livingston
9 President
10 Arizona Water Company
11 P.O. Box 29006
12 Phoenix, Arizona 85038-9006
13 Fax: 602-240-6878

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