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September 29, 2005

Mr. Jim Dorf
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007-2927

Re: **Why Utilities Co., Inc. – Application for a Rate Increase
W-02052A-05-0529 Insufficiency Letter**

Dear Mr. Dorf:

As a follow up to my letter of September 26, 2005, enclosed please find the additional information that Staff had requested regarding the bill counts.

If you have any questions regarding this matter, please call me at (602) 382-6304.

Very truly yours,

Snell & Wilmer

Kimberly A. Grouse

KAG:ch
Enclosures

cc: Docket Control Center (sixteen copies)
Vern Denning, Why Utilities Co., Inc.
Lyn Farmer, Hearing Division
Delbert Smith, Engineering
Consumer Services
Legal Division

Company Name: Why Utility Co., Inc.	Test Year Ended:
Meter Size: 5/8 Residential	

BILL COUNT WORKSHEET

GALLONAGE RANGE	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	TOTAL BILLS
- 0 -	15	14	14	11	54
1 to 1,000	19	15	16	26	76
1,001 to 2,000	25	14	2	22	63
2,001 to 3,000	32	12	10	16	70
3,001 to 4,000	18	12	9	12	51
4,001 to 5,000	9	15	11	15	50
5,001 to 6,000	15	5	12	8	40
6,001 to 7,000	14	6	4	11	35
7,001 to 8,000	3	5	10	13	31
8,001 to 9,000	7	8	5	7	27
9,001 to 10,000	3	7	7	4	21
10,001 to 12,000	12	6	8	11	37
12,001 to 14,000	6	6	8	6	26
14,001 to 16,000	13	3	11	9	36
16,001 to 18,000	7	6	6	2	21
18,001 to 20,000	2	10	4	4	20
20,001 to 25,000	8	15	8	3	34
25,001 to 30,000	5	9	11	8	33
30,001 to 35,000	2	8	6	6	22
35,001 to 40,000	2	11	8	7	28
40,001 to 50,000	1	4	8	1	14
50,001 to 60,000		3	3	1	7
60,001 to 70,000		1	4		5
70,001 to 80,000	1	2		1	4
80,001 to 90,000			1	1	2
90,001 to 100,000		1	1		2
Over 100,000 (List actual gallons, e.g., 120,000)		2 259,990	4 499,920		6
Total Bills	219	200	191	205	1034

Company Name: Why Utility Co., Inc.	Test Year Ended:
Meter Size: 2" Commercial	

BILL COUNT WORKSHEET

GALLONAGE RANGE	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	TOTAL BILLS
- 0 -	1	3	1		5
1 to 1,000			1		1
1,001 to 2,000					
2,001 to 3,000		2			2
3,001 to 4,000	1		1		2
4,001 to 5,000	2		1	1	4
5,001 to 6,000			1	2	3
6,001 to 7,000	2		1		3
7,001 to 8,000	1			1	2
8,001 to 9,000		1			1
9,001 to 10,000	2				2
10,001 to 12,000				1	1
12,001 to 14,000	1	2	1		4
14,001 to 16,000					
16,001 to 18,000		1	2	1	4
18,001 to 20,000	1	2		1	4
20,001 to 25,000			2	1	3
25,001 to 30,000	2			3	5
30,001 to 35,000		1		2	3
35,001 to 40,000	1	1	1		3
40,001 to 50,000	2	2	1	2	7
50,001 to 60,000		1	2	1	4
60,001 to 70,000	4	3	3	1	11
70,001 to 80,000	1	1	2	3	7
80,001 to 90,000		2			2
90,001 to 100,000	3		1		4
Over 100,000 (List actual gallons, e.g., 120,000)		3 357,900	1	1 122,500	5
Total Bills	24	25	22	21	92

Company Name: Why Utility Co., Inc.	Test Year Ended:
Meter Size: 5/8 Commercial	

BILL COUNT WORKSHEET

GALLONAGE RANGE	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	TOTAL BILLS
- 0 -			2	3	5
1 to 1,000	8	2	4	3	17
1,001 to 2,000	4	5	4	3	16
2,001 to 3,000		4	2	1	7
3,001 to 4,000		1	2	1	4
4,001 to 5,000	3	3	4	2	12
5,001 to 6,000		1		1	2
6,001 to 7,000	1	1	1	2	5
7,001 to 8,000		2	1	1	4
8,001 to 9,000	1				1
9,001 to 10,000	1		1	2	4
10,001 to 12,000	2	1	2	2	7
12,001 to 14,000		1		2	3
14,001 to 16,000		2		1	3
16,001 to 18,000	4	1		2	7
18,001 to 20,000	2	2			4
20,001 to 25,000	1		4		5
25,001 to 30,000	2	1			3
30,001 to 35,000	1	1	1	2	5
35,001 to 40,000		1	1	1	3
40,001 to 50,000		1			1
50,001 to 60,000		1		1	2
60,001 to 70,000					
70,001 to 80,000					
80,001 to 90,000					
90,001 to 100,000					
Over 100,000 (List actual gallons, e.g., 120,000)			1 162,190		1 162,190
Total Bills	30	31	30	30	121

Company Name: Why Utility Co., Inc.	Test Year Ended:
Meter Size: 1 1/2" Commercial	

BILL COUNT WORKSHEET

GALLONAGE RANGE	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	TOTAL BILLS
- 0 -					
1 to 1,000					
1,001 to 2,000					
2,001 to 3,000					
3,001 to 4,000					
4,001 to 5,000					
5,001 to 6,000					
6,001 to 7,000					
7,001 to 8,000					
8,001 to 9,000					
9,001 to 10,000					
10,001 to 12,000					
12,001 to 14,000			2		2
14,001 to 16,000					
16,001 to 18,000				1	1
18,001 to 20,000					
20,001 to 25,000			1	2	3
25,001 to 30,000					
30,001 to 35,000					
35,001 to 40,000	3	1			4
40,001 to 50,000		2			2
50,001 to 60,000					
60,001 to 70,000					
70,001 to 80,000					
80,001 to 90,000					
90,001 to 100,000					
Over 100,000 (List actual gallons, e.g., 120,000)					
Total Bills	3	3	3	3	12