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**ARIZONA CORPORATION COMMISSION**

06.D

November 18, 2005

Mr. Gregory G. Horne  
9630 N. 25<sup>th</sup> Avenue, Ste 450  
Phoenix, Arizona 85021

RE: HIGH COUNTRY PINES WATER COMPANY APPLICATION FOR A RATE INCREASE, DOCKET NO. W-02448A-05-0745

LETTER OF DEFICIENCY

Dear Mr. Horne:

In reference to the Company's rate application received on October 21, 2005, this letter is to inform you that your application has not met the sufficiency requirements as outlined in Arizona Administrative Code R14-2-103.

Staff has found deficiencies with your application, which are listed on a separate attachment. The 30-day sufficiency determination period will begin anew when the Company corrects the deficiencies and Docket Control receives an original and sixteen copies of the corrected pages. The test year ending December 31, 2004 is acceptable.

You have until December 7, 2005, to correct the deficiencies or make other arrangements with Staff to remedy your rate application.

The Staff person assigned to process your application is Elena Zestrijan. Mrs. Zestrijan can be reached at (602) 542-0831, or toll free at (800) 222-7000, if you have any questions or concerns.

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DOCUMENT CONTROL

Sincerely,

Jim Dorf  
Chief, Financial & Regulatory Analysis Section  
Utilities Division

CC: Docket Control Center (sixteen copies)  
Lyn Farmer, Hearing Division  
Delbert Smith, Engineering  
Consumer Services  
Legal Division

Snell & Wilmer L.L.P.  
Attn: Kimberly Grouse  
One Arizona Center  
400 E. Van Buren  
Phoenix, Az 85004-2202

HIGH COUNTRY PINES WATER COMPANY  
DOCKET NO. W-02448A-05-0745  
RATE INCREASE APPLICATION  
LIST OF DEFICIENCIES  
November 18, 2005

1. Staff has found that the bill counts submitted by the Company do not generate the revenue reflected in the application.
2. Please provide explanation on page 21, Balance Sheet "Current and Accrued Assets" amount of \$34,388.