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BEFORE THE ARIZONA CORPORATION COMMISSION

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WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

Arizona Corporation Commission
DOCKETED
ARIZONA CORPORATION COMMISSION
DOCUMENT CONTROL

MAY 18 2001

DOCKETED BY

IN THE MATTER OF THE COMPLAINT OF
PETER AND PATRICIA GOSHIA d/b/a BURRO
INN AGAINST CITIZENS COMMUNICATIONS
COMPANYS

Docket No. E-01032A-01-0348

ANSWER

GALLAGHER & KENNEDY, P.A.
2575 E. CAMELBACK ROAD
PHOENIX, ARIZONA 85016-9225
(602) 530-8000

Citizens Communications Company through Citizens Energy Services

("Citizens") answers the formal complaint filed by Peter and Patricia Goshia d/b/a Burro Inn on April 24, 2001 as follows. Under A.A.C. R14-2-212, Mr. Goshia's complaint was investigated as an informal complaint. Commission Staff conducted an informal investigation and an arbitration hearing, and determined the matter in Citizens' favor. Mr. Goshia's formal complaint here is unsupported and should be dismissed by the Arizona Corporation Commission.

Citizens has tried to respond to the formal complaint paragraph-by-paragraph. Citizens denies any and all allegations in the formal complaint not expressly admitted herein.

I.

The allegations contained on page 1 of the formal complaint do not form any valid factual bases for a complaint against Citizens. Complainants have not provided sufficient detail or information to support those allegations. Citizens denies that it has done anything improper or inappropriate in billing the complainants.

II.

Citizens denies the allegations on page 2 of the formal complaint regarding credits

1 and refunds. Further, or about October 29, 1999, Citizens Eddie Jiminez tested complainants'
2 electric meter service. All CTs and wiring were found in good working condition. The
3 multiplier of 40 was checked with CT ratio and the multiplier was correct. Meter No. 14007 was
4 removed and tested at the meter shop and was found to be in proper working condition and
5 registering 100.04% accuracy. Citizens provided a letter to Mr. Goshia on March 30, 2000
6 attesting to the meter inspection and including copies of the October 29, 1999 test results. See
7 March 30, 2000 letter from Eddie Jiminez to Pete Goshia (attached as exhibit A). Citizens sent
8 Mr. Goshia another letter on September 14, 2000 regarding Mr. Goshia's meters and billings.
9 See September 14, 2000 letter from Amanda Rivero to Pete Goshia (exhibit B).

10 *III.*

11 In response to the allegations contained on the last sentence of page 2 and page 3
12 of the formal complaint, Citizens denies the alleged problems with the meters. Both Citizens and
13 Arizona Corporation Commission Staff inspected and reviewed complainants' meters which
14 were found to be in proper working order. Citizens and Staff engineers inspected the meter and
15 verified a properly working multiplier of forty. See October 27, 2000 letter from John Bostwick
16 to Pete Goshia (exhibit C); exhibits A and B. In response to the other allegations contained on
17 these pages of the formal complaint, Citizens' Amanda Rivera had a site visit with Mr. Goshia
18 on October 4, 2000 and provided copies of tariffs and spreadsheet tariff calculations. Citizens
19 was willing to provide copies of its tariffs at all times.

20 *IV.*

21 In response to the allegations contained on page 4 of the formal complaint,
22 Citizens alleges that it provided Mr. Goshia with copies of applicable tariffs on October 4, 2000
23 and was willing to provides copies of the company's tariffs at all times. Also, complainants'
24

1 allegations on this page 4 are vague and confusing and do not support any complaint against
2 Citizens.

3 *V.*

4 The allegations contained on page 5 of the formal complaint are vague,
5 conclusory and argumentative. Both Citizens and Commission Staff conducted a full and proper
6 inspection of complainants' meters and bills. The inspections revealed the meters to be in proper
7 working order with appropriate multipliers; and, demonstrated that Citizens' bills were proper
8 and reasonable. In response to the remaining allegations on page 5, complainants operate a hotel
9 and restaurant business at the site.

10 *VI.*

11 The allegations contained on page 6 are vague and conclusory and Citizens denies
12 the allegations contained on page 6 for the reasons set forth in ¶¶ III and V above.

13 *VII.*

14 In response to the allegations contained on page 7, Citizens alleges that the
15 company repeatedly verified complainants' bills and responded to complainants' charges of
16 overbilling (orally, in person and in writing). See February 23, 2001 letter from Amanda Rivero
17 to Pete Goshia (exhibit D). Citizens denies that it overbilled or improperly charged complainants
18 in any fashion. Citizens further alleges that complainants' meters were in proper working order
19 and that complainants' charges of overbilling are factually and legally unsupported.

20 *VIII.*

21 Citizens denies the allegations on page 8. Citizens is unsure exactly what
22 complainants are alleging on page 8, but alleges that the company's tariff does not require a chart
23 or information listing all multipliers for meters.

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IX - XI.

In response to the allegations on pages 9-11 of the formal complaint, Citizens alleges that following the informal arbitration, Staff resolved the complaint in Citizens' favor. To the extent Mr. Goshia seeks refunds beginning in 1992, those claims are barred by Ariz. Rev. Stat. § 40-248. Citizens' tariff does not require a chart or information listing all multipliers for meters. Citizens denies the remaining allegations on pages 9-11. The allegations contained on pages 9-11 do not warrant any formal complaint against Citizens.

XII.

Complainants' formal complaint is barred by Ariz. Rev. Stat. § 40-248 because it was not "filed with the Commission within two years from the time the cause of action" allegedly occurred. According to the formal complaint, complainants seek a refund for bills since 1992 and the formal complaint is barred on statute of limitations grounds.

XIII.

Citizens repeatedly addressed and answered all of complainants' billing concerns. Complainants' formal complaint is unsubstantiated and unfounded. Complainants have no factual support in the record and this formal complaint should be resolved in Citizens' favor.

XIV.

Citizens further provided complainants with numerous spreadsheets, inspection reports and other testing data verifying the accuracy and amounts of electric and gas billing statements. Complainants' claims to the contrary are unfounded and unsupported. The formal complaint should be barred on grounds of waiver, estoppel and lack of evidence, among others.

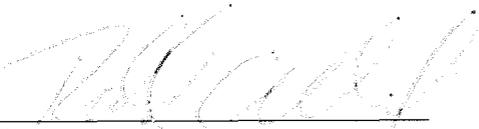
RELIEF REQUESTED

For the reasons set forth above, and based on the evidentiary and factual record

1 underlying this matter, the Arizona Corporation Commission should dismiss this formal
2 complaint and resolve the matter in Citizens' favor. Citizens requests that the Commission
3 summarily dismiss this complaint.

4 DATED this 15 day of May, 2001.

5 GALLAGHER & KENNEDY, P.A.

6
7 By 
8 Michael M. Grant
9 Todd C. Wiley
10 2575 East Camelback Road
11 Phoenix, Arizona 85016-9225
12 Attorneys for Citizens Communications
13 Company

11 **Original** and ten copies filed this
12 15 day of May 2001, with:

13 Docket Control
14 Arizona Corporation Commission
15 1200 West Washington
16 Phoenix, Arizona 85007

15 **Copies** of the foregoing mailed
16 this 15 day of May, 2001, to:

17 Lyn Farmer
18 Chief Hearing Officer
19 Arizona Corporation Commission
20 1200 West Washington
21 Phoenix, Arizona 85007

22 Christopher Kempley, Esq.
23 Legal Division
24 Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

1 Peter Goshia
d/b/a Burro Inn
2 Post Office Box 4188
76 West El Burro Lane
3 Tubac, Arizona 85646

4
By: *Peter Goshia*
5 3099-0005/927002

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A

B

1710 N. Mastick Way
P.O. Box 280
Nogales, Arizona 85628-0280
520.281.1212



March 30, 2000

Mr. Pete Goshia
Burro Inn
P.O. Box 4188
Tubac, AZ 85646

Dear Mr. Goshia,

Enclosed you will find more information regarding your electric meter service, which was inspected on October 29, 1999. All Cts and wiring were found in good working condition, the multiplier of 40 was checked with CT ratio and the multiplier is correct. Meter number 14007 was removed and tested at the meter shop. The meter was found to be working condition and registering 100.04% accuracy, which you will see in test report. A new meter was installed, meter number 21138 with serial number KZG00238201400000. Enclosed you will find a test sheet with your meter serial number highlighted which includes meter test and meter type information. Both your old meter and the new one are required to have Total KWh and Maximum KW display for accurate meter reading billing consumption.

If you have any questions please call Amanda Rivero at 281-1212 ext. 457 or myself at ext. 412.

Thank You,

A handwritten signature in black ink, appearing to read "Eddie Jimenez". The signature is written in a cursive style with a long, sweeping tail that extends to the right.

Eddie Jimenez
Journeyman Meterman

Enclosure

METER TEST CUSTOMER REQUEST

Name Burro Inn Test Date Oct. 29, 1999
 Address 70 W. El Burro Lane
 Address Tubac Az. 85646
 Reason for Test CUSTOMER REQUEST

Co. Meter No	<u>14007</u>	Class	<u>20</u>
Serial No.	<u>34290976</u>	Form	<u>6-s</u>
Reading	<u>13213</u>	Wire	<u>4</u>
Make	<u>Landis & Gyr</u>	Rr.	<u>SS</u>
Type	<u>SSM</u>	Mult.	<u>40</u>
Amps.	<u>2.5</u>	HZ.	<u>60</u>
Volts	<u>120</u>		
Kh	<u>1.8</u>		
Seal and date	<u>OK</u>		

Location SHOP
 Ground GOOD
 Creep NONE
 Remark METER WAS FOUND IN GOOD CONDITION. ALL MACHANICAL AND SS PARTS ARE IN GOOD WORKING CONDITION.

AS FOUND

	Amps	Std. Coil	Kh	Meter Rev	% REG.			
FL	2.5	2.5	1.8	10	100.04			
PF	2.5	2.5	1.8	10	100.02			
LL	2.5	0.25	1.8	1	100.06			
AVERAG					100.04			

AS LEFT

	Amps	Std Coil	Kh	Meter Rev	% Reg.			
FL	2.5	2.5	1.8	10	100.04			
PF	2.5	2.5	1.8	10	100.02			
LL	2.5	0.25	1.8	1	100.06			
AVERAG					100.04			

Remarks METER CHECKS OUT OK . METER REGISTERING AT 100.04 % ACCURATELY

AS YOU REQUESTED, YOUR ELECTRIC METER HAS BEEN TESTED. THE RESULTS INDICATE THAT YOUR METER IS REGISTERING AT 100.04 % ACCURATELY IF YOU HAVE ANY QUESTIONS, PLEASE DO NOT HESITATE TO CALL ME.

AT (520) 281-1212 EXT. 412
 CITIZENS UTILITIES COMPANY

E. Jimenez
 EDDIE JIMENEZ
 METER TECHNICIAN

Cust Name: WESCO DISTRIBUTION INC Box Date: 12/28/1998
 Gen Order# WSC2357 000002 Mfg Order# M610260 Cust Order# C840710

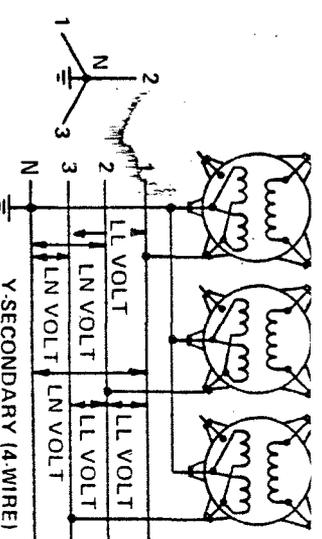
Form: Class: CL20 TA: 2.5 TV: 120 Kh: 1.800 P/R: 24
 Style: P3200000 Type: A1D

Serial Number	LFL	LPF	MFL	MPF	RFL	RPF
KZG00238201000000	100.013	100.007	100.017	100.007	99.987	100.007
KZG00238201100000	99.993	100.027	100.003	100.013	100.000	99.967
KZG00238201200000	99.983	100.030	99.997	100.020	100.003	100.013
KZG00238201300000	99.990	99.960	99.997	100.020	99.990	99.977
KZG00238201400000	100.007	99.977	100.010	100.027	100.003	100.013
KZG00238201500000	99.980	100.007	99.990	100.010	99.987	99.960
KZG00238201600000	100.020	100.037	100.003	99.997	100.017	99.950
KZG00238201700000	100.003	99.983	99.990	100.040	100.013	100.030
Mean	99.999	100.003	100.001	100.017	100.000	99.990
Std Deviation	0.013	0.026	0.009	0.012	0.011	0.028

SECTION 10

HREE-PHASE 4-WIRE WYE CIRCUIT WITH THREE CT'S

entering on a 208Y/120-volt or 480Y/277-volt, 3-phase, wire Wye circuit, using three current transformers, and a stator, transformer-rated meter with a 13-jaw socket.



FOR THIS METERING RANGE:

Equiv. kVA or HP	Amperes	LL/LN Volts
7.2 to 115	20 - 320	208Y/120
14.4 to 230	40 - 640	208Y/120
7.2 to 461	20 - 1280	208Y/120
16.6 to 266	20 - 320	480Y/277
33.2 to 532	40 - 640	480Y/277
16.6 to 1063	20 - 1280	480Y/277

SELECT THIS CURRENT TRANSFORMER (CT):

Ratio	Type	Catalog Number	T.F.*
200:5	JCR-0	750X34G7	40
400:5	JCR-0	750X34G8	80
400:5	JAK-0	750X33G313	80
200:5	JCR-0	750X34G7	40
400:5	JCR-0	750X34G8	80
400:5	JAK-0	750X33G313	80

4 WIRE WYE, THREE-PHASE, TRANSFORMER-RATED, FORM 9S METERS

Type	Meter Class	Volts (ll)	Test Amps	WHR Const. (kWh)	Register Ratio	Register	Full Scale (kw)	Dial Mult.	Catalog Number
V-64-S	20	120Y	2.5	1.8	111 1/9	5 Dial Pointer	-	1 X T.F.* (See Above)	706X14G9
VM-64-S	20	120Y	2.5	1.8	111 1/9	M-60, 5 Dial [2], 15 Min. Interval	8.30	1 X T.F.* (See Above)	706X16G246
VM-64-S	20	120Y	2.5	1.8	111 1/9	M-60, 5 Dial [2], 30 Min. Interval	8.30	1 X T.F.* (See Above)	706X16G18
V-64-S	20	240Y	2.5	3.6	55 5/9	5 Dial Pointer	-	1 X T.F.* (See Above)	706X14G102
VM-64-S	20	240Y	2.5	3.6	55 5/9	M-60, 5 Dial [2], 15 Min. Interval	8.30 [3]	1 X T.F.* (See Above)	706X16G247
VM-64-S	20	240Y	2.5	3.6	55 5/9	M-60, 5 Dial [2], 30 Min. Interval	8.30 [3]	1 X T.F.* (See Above)	706X16G248

NOTES:

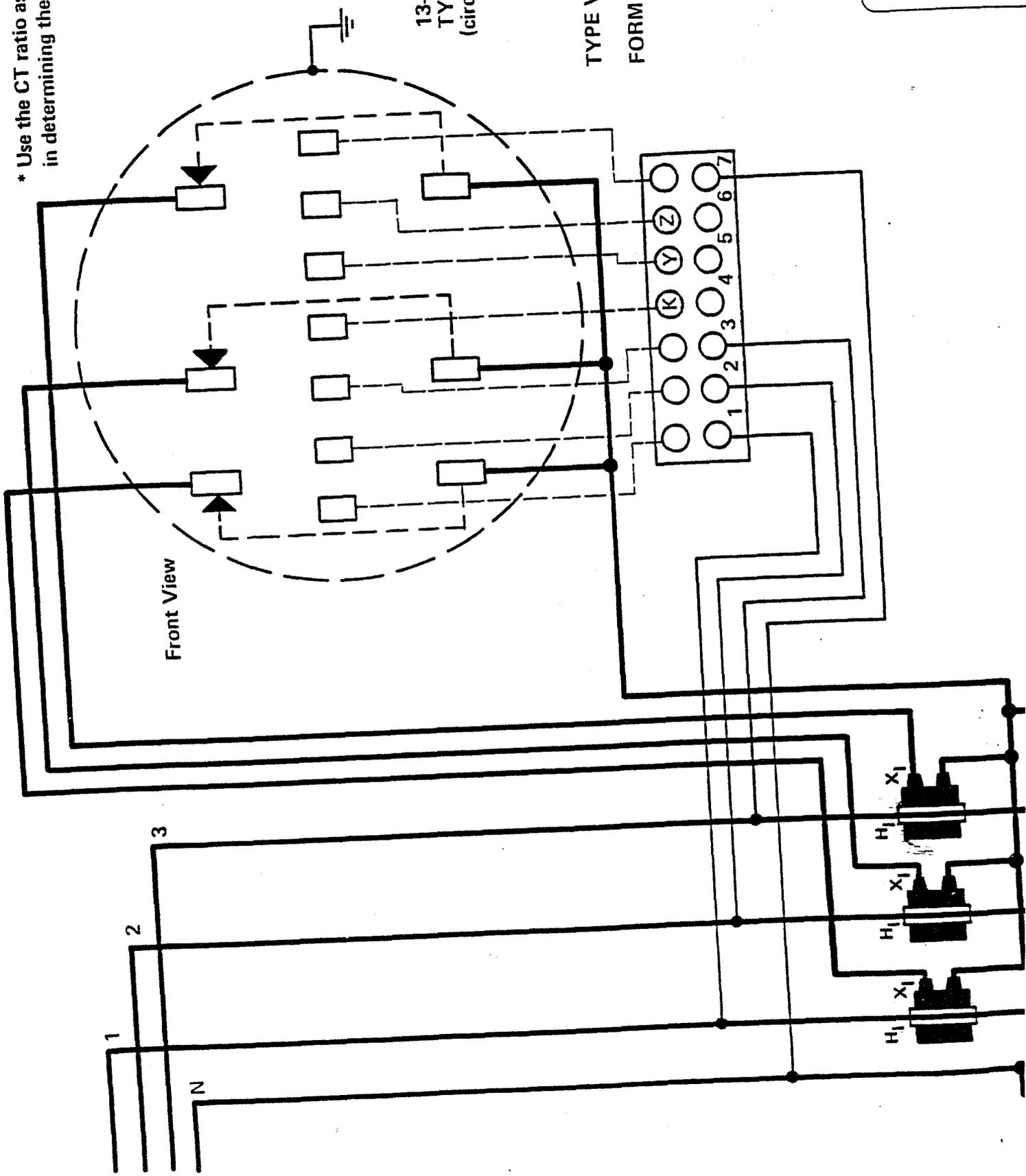
- [1] 240Y Volt (Line to Neutral) Meters for Use on 480Y/277-Volt 4 Wire Y, 3 Phase Circuits. Standard Listed Models Have Nameplate Marked "240 VY." An Optional Nameplate Marked "480Y/277V" is Available upon Request.
- [2] M-30 & M-50 Demand Registers Also Available. Order "Similar to (Cat. # Above) Except With M-30 (or M-50) Register" and Specify Scale Class Desired. See Page 21 for Scale Class Definitions and Recommendations.
- [3] M-60 Registers with Effective Full Scale Capacity of 16.6 kw are Available to Meter Loads in Excess of 8.3 kw by Ordering Meter "Similar to (Cat. # Above) Except With Register Ratio of 111 1/9 and a Multiplier of 2 X T.F."

*T.F. (Transformer Factor) = CT Ratio x VT Ratio

SOCKET

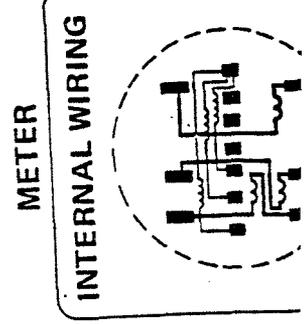
SV-60 Ringless Socket. Interchangeable Hub 1 1/2" Dia. Transformer-Rated. 20 Ampere Capacity. Steel Case. With Automatic Circuit Closers. Cat. # 741X18G144

* Use the CT ratio as transformer factor in determining the meter multiplier.



13-JAW
TYPE SV-60 SOCKET
(circuit closing)

TYPE V-64-S METER
FORM 9S



INSTRUMENT TRANSFORMERS

CURRENT TRANSFORMERS- Are instrument transformers designed with a few turns of heavy wire to carry the full load current of the circuit and secondary of many turns of smaller wire with a maximum current of 5-20 amps, depending on the design.

Current transformer is designed to take a heavy load on the primary and transform it to a smaller current used to drive watt hour meters, ammeters, relays & etc. by the impedance of the burden in the iron core. There are 3 types of C.T's: wound type, window and bar type. We mainly use the window type which are rated from 100:5 to 1200:5.

POTENTIAL TRANSFORMER- Instrument transformer designed with 2 or more windings wrapped around an iron core. The primary is many turns of fine wire and secondary is fewer turns of heavier wire. It transforms a high voltage to a usual standard voltage of 120V. These transformers are used to drive volt meters and protective relay. They are rated by primary voltage of circuit.

SAFETY ALERT: Always ground the secondaries of all P.T's and C.T's when wiring them up. Because there is the possibility of high voltage being induced on secondaries. On C.T's always shunt terminals (short-circuit) on secondary because by induction there will be an extremely high voltage across the terminals and it will be proportional to the windings. All instrument transformers are polarized, wire accordingly.

C

September 14, 2000

Pete Goshia
P.O. Box 4188
Tubac, Arizona 85646

Ref: Burro Inn
197469-123600

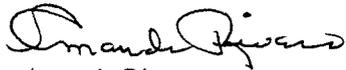
Dear Mr. Goshia:

In reference to your complaint regarding the electric billing for your commercial account referenced above I would like to inform you that we found no discrepancies with our metering equipment nor with our billing procedures. On August 29, 2000 we did a site visit along with Reg Lopez and Asher Emerson of the Arizona Corporation Commission at which time Mr. Emerson checked out the CT's on the electrical service and concluded that the multiplier of 40 on the meter was correct.

Mr. Goshia back on October 29, 1999 you requested that we remove the existing meter at that time #14007 and have it tested which was done and all test results were mailed to you. The meter was found to be in good working condition and registering 100.04% accurate. I have also created spreadsheets to recalculate your bills and I show all bills calculated correctly. In conclusion I see no problems with your account and I hope that we have satisfied your needs by checking our equipment and having gone thru your bills. I would also like to hear from you in regards to payment on your account and will be glad to work with you on a payment plan so that you may bring your bill up to date.

If you have any questions regarding the above please feel free to call me.

Sincerely,



Amanda Rivero

CARL J. KUNASEK
CHAIRMAN
JIM IRVIN
COMMISSIONER
WILLIAM A. MUNDELL
COMMISSIONER



BRIAN C. McNEIL
EXECUTIVE SECRETARY

ARIZONA CORPORATION COMMISSION

October 27, 2000

Mr. Pete Goshia
70 West El Burro Lane
P.O. Box 4188
Tubac, Arizona, 85646-4188

Dear Mr. Goshia:

I am responding to your letters dated September 21, 2000 and September 25, 2000 respectively to Mr. Reg Lopez. In addition, I am responding to your letters dated October 6, 2000 and October 18, 2000 respectively to me.

Please be advised that your initial request for information, in the September 21, 2000 letter, surfaced three days after the Commission representative rendered a written decision of the arbitration meeting. Since you rejected our position in the arbitration meeting, I sent you the necessary letter, instructions, and form(s) to file a formal complaint. I appreciate knowing that you received the formal complaint material.

The Arizona Corporation Commission ("Commission") is unable to provide you written confirmation that it has not received written material from Citizens Utilities Company ("Citizens") addressing your complaint. In the course of conducting an informal investigation and an arbitration meeting, written and oral evidentiary material was obtained by the Commission representative. This material as well as the interviews conducted and cross-examination of parties involved in the dispute forms the basis for the representative to make a decision.

I have written assurance from Citizens that you have the tariffs you requested.

I understand that you want a copy of the program installed in your meter and verification of the three constants that control the digital read out and the sealed multiplier on the meter. The Staff Engineer, Asher Emerson, has no known knowledge of a program installed in your meter. The Commission's Staff Engineer did verify that you have a three-phase meter with a multiplier of forty.

The User Operator Manual you requested is proprietary information. It is not available for public distribution.

Post-it® Fax Note	7671	Date	10-27-00	# of pages	10
To	Amanda Rivero		From	John Bastwick	
Co./Dept.	Citizens		Co.	ACC	
Phone #			Phone #	602-542-0856	
Fax #	520-761-7997		Fax #	602-542-2129	

Mr. Goshia

October 27, 2000

Page 2

The affidavits you requested from Citizens, in your September 25, 2000 letter, were furnished to you. Eddie Jimenez, Journeyman Meterman of Citizens, mailed a letter to you on March 30, 2000. The letter provided the ending reading and information on the meter test. In addition, the letter states that Citizens installed a new meter with a zero reading. This letter is dated and signed and serves as your request for affidavits.

Since the Commission has no jurisdiction over City Tax, I am not able to address the application of the tax applied to your electric bill. Also, the application of Dusk to Dawn and other line item charges are not relevant to your complaint.

In your letter to me dated October 6, 2000, you inquired about the electrical measurement of your meter. Citizens took electrical measurements when the old meter was tested and when a new meter was installed. Both the meter test and installation of the replacement meter were done in compliance with the Arizona Administrative Code rules.

I am returning your spreadsheets. Since there is no gas utility complaint on file, there is no need to have this material. Generally speaking, the Commission representative assigned to handle the complaint is responsible for obtaining material needed to resolve a complaint. You do not need provide unsolicited material.

I hope I have addressed your requests and concerns. If not, you will have opportunity to address your requests and concerns when you proceed with the formal complaint process. Also, I hope you obtain a favorable decision as a result of filing your formal complaint.

Sincerely,



John Bostwick
Consumer Service Unit Supervisor
Utilities Division

JFB:eap

Cc: Amanda Rivero, Citizens Utilities Companies
Enclosures (8)

B.I. Gas Bills

YEAR	1992					
	\$ USAGE	Meter	Delta	X =	OCF	\$PERCCF
JAN		4505			0	unk
FEB	118.81	4560	55	4.909	270	0.44
MAR	157.56	4635	75	4.907	368	0.4282
APR	161.7	4712	77	4.896	377	0.4289
MAY	105.25	4760	48	4.896	235	0.4479
JUNE	99.61	4805	45	5.222	235	0.4239
JULY	99.77	4850	45	4.911	221	0.4514
AUG	56.95	4873	23	9.609	221	0.2577
SEPT	68.2	4902	29	3.897	113	0.6035
OCT	70.17	4932	30	4.733	142	0.4942
NOV	78.08	4966	34	4.324	147	0.5312
DEC	130.05	5027	61	2.885	176	0.7389
Total\$	1146.15					
YEAR	1993					
	\$ USAGE	Meter	Delta	X =	OCF	\$PERCCF
JAN	120.69	5083	56	4.911	275	0.4389
FEB	136.09	5147	64	4.906	314	0.4334
MAR	140.16	5213	66	4.909	324	0.4326
APR	118.71	5268	55	4.909	270	0.4397
MAY	80.19	5303	35	4.914	172	0.4662
JUNE	83.41	5340	37	4.892	181	0.4608
JULY	70.12	5370	30	4.9	147	0.477
AUG	64.09	5397	27	4.889	132	0.4855
SEPT	72.1	5428	31	4.903	152	0.4743
OCT	60.54	5453	25	4.92	123	0.4922
NOV	87.35	5492	39	4.897	191	0.4573
DEC	130.17	5553	61	4.902	299	0.4354
Total\$	1163.62					

B.I. Gas Bills

YEAR	1994					
	\$ USAGE	Meter	Delta	X =	CCF	PERCCF
JAN	79.86	5588	35	4.914	172	0.4643
FEB	131.55	5650	62	4.903	304	0.4327
MAR	131.9	5712	62	4.903	304	0.4339
APR	89.25	5752	40	4.9	196	0.4554
MAY	69.95	5782	30	4.9	147	0.4759
JUNE	62.07	5808	26	4.885	127	0.4887
JULY	52.62	5829	21	4.905	103	0.5109
AUG	52.62	5850	21	4.905	103	0.5109
SEPT	58.53	5874	24	4.917	118	0.496
OCT	66.01	5902	28	4.893	137	0.4818
NOV	73.71	5943	41	3.829	157	0.4695
DEC	114.26	5987	44	5.909	260	0.4395
Total\$	982.33					
YEAR	1995					
	\$ USAGE	Meter	Delta	X =	CCF	PERCCF
JAN	131.45	6049	62	4.903	304	0.4324
FEB	120.06	6105	56	4.911	275	0.4366
MAR	108.74	6155	50	4.9	245	0.4438
APR	100.59	6201	46	4.891	225	0.4471
MAY	67.98	6230	29	4.897	142	0.4787
JUNE	61.97	6256	26	4.885	127	0.488
JULY	54.39	6278	22	4.909	108	0.5055
AUG	22.61	6285	7	4.857	34	0.665
SEPT	43.9	6302	17	4.882	83	0.5289
OCT	68.09	6331	29	4.897	142	0.4795
NOV	67.98	6360	29	4.897	142	0.4787
DEC	78.02	6394	34	4.912	167	0.4672
Total\$	925.98					

B.I. Gas Bills

YEAR	1996					
	\$ USAGE	Meter	Delta	X =	CCF	PER CCF
JAN	130.17	6455	61	4.902	299	0.4354
FEB	69.89	6485	30	4.9	147	0.4754
MAR	108.27	6535	50	4.9	245	0.4419
APR	71.86	6566	31	4.903	152	0.4728
MAY	56.69	6589	23	4.913	113	0.5017
JUNE	54.67	6611	22	4.909	108	0.5062
JULY		6629	18	#####	unk	unk
AUG	33.45	6641	12	4.917	59	0.5669
SEPT	41.7	6657	16	4.875	78	0.5346
OCT	54.38	6679	22	4.909	108	0.5035
NOV	295.17	6829	150	4.9	735	0.4016
DEC	6.6	6829	0	#####	0	#DIV/0!
Total\$	922.85					
YEAR	1997					
	\$ USAGE	Meter	Delta	X =	CCF	PER CCF
JAN	0	6829	0	#####	0	unk
FEB	43.76	6846	17	4.882	83	0.5272
MAR	98.67	6891	45	4.911	221	0.4465
APR	73.47	6923	32	4.906	157	0.468
MAY	45.93	6941	18	4.889	88	0.5219
JUNE	41.6	6957	16	4.875	78	0.5333
JULY	31.15	6968	11	4.909	54	0.5769
AUG	33.37	6980	12	4.917	59	0.5656
SEPT	33.3	6992	12	4.917	59	0.5644
OCT	31.12	7003	11	4.909	54	0.5763
NOV	122.83	7061	58	4.897	284	0.4325
DEC	6.6	7061	0	#####	0	#DIV/0!
Total\$	561.8					

B.I. Gas Bills

YEAR	1998					
	\$ USAGE	Meter	Delta	X =	CCF	PER CCF
JAN	50.13	7081	20	4.9	98	0.5115
FEB	92.4	7123	42	4.905	206	0.4485
MAR	84.53	7161	38	4.895	186	0.4545
APR	86.4	7200	39	4.897	191	0.4524
MAY	31.07	7211	11	4.909	54	0.5754
JUNE	15.45	7215	4	5	20	0.7725
JULY	37.59	7229	14	4.929	69	0.5448
AUG	28.79	7239	10	4.9	49	0.5876
SEPT	29.04	7249	10	4.9	49	0.5927
OCT	26.86	7258	9	4.889	44	0.6105
NOV	30.94	7272	14	1	14	2.21
DEC	43.67	7297	25	0.8	20	2.1835
Total\$	556.87					
YEAR	1999					
	\$ USAGE	Meter	Delta	X =	CCF	PER CCF
JAN	53.43	7317	20	1.25	25	2.1372
FEB	59.36	7345	28	1	28	2.12
MAR	39.55	7363	18	1	18	2.1972
APR	55.51	7389	26	1	26	2.135
MAY	16.11	7396	7	1	7	2.3014
JUNE	22.49	7406	10	1	10	2.249
JULY	11.25	7411	5	1	5	2.25
AUG	33.58	7406	-5	-0.8	4	8.395
SEPT	8.69	7415	9	0.444	4	2.1725
OCT	23.49	7424	9	1	9	2.61
NOV	26.01	7434	10	1	10	2.601
DEC	46.16	7452	18	1	18	2.5644
Total\$	395.63					

B.I. Gas Bills

YEAR	1992					
	\$ USAGE	Meter	Delta	X =	CCF	\$PERCCF
JAN		4505			0	unk
FEB	118.81	4560	55	4.909	270	0.44
MAR	157.56	4635	75	4.907	368	0.4282
APR	161.7	4712	77	4.996	377	0.4289
MAY	105.25	4760	48	4.896	235	0.4479
JUNE	99.61	4805	45	5.222	235	0.4239
JULY	99.77	4850	45	4.911	221	0.4514
AUG	56.95	4873	23	9.609	221	0.2577
SEPT	68.2	4902	29	3.897	113	0.6035
OCT	70.17	4932	30	4.733	142	0.4942
NOV	78.08	4966	34	4.324	147	0.5312
DEC	130.05	5027	61	2.885	176	0.7389
Total\$	1146.15					
YEAR	1993					
	\$ USAGE	Meter	Delta	X =	CCF	\$PERCCF
JAN	120.69	5083	56	4.911	275	0.4389
FEB	136.09	5147	64	4.906	314	0.4334
MAR	140.16	5213	66	4.909	324	0.4326
APR	118.71	5268	55	4.909	270	0.4397
MAY	80.19	5303	35	4.914	172	0.4662
JUNE	83.41	5340	37	4.892	181	0.4608
JULY	70.12	5370	30	4.9	147	0.477
AUG	64.09	5397	27	4.889	132	0.4855
SEPT	72.1	5428	31	4.903	152	0.4743
OCT	60.54	5453	25	4.92	123	0.4922
NOV	87.35	5492	39	4.897	191	0.4573
DEC	130.17	5553	61	4.902	299	0.4354
Total\$	1163.62					

B.I. Gas Bills

YEAR	1994					
	\$ USAGE	Meter	Delta	X =	CCF	PER CCF
JAN	79.86	5588	35	4.914	172	0.4643
FEB	131.55	5650	62	4.903	304	0.4327
MAR	131.9	5712	62	4.903	304	0.4339
APR	89.25	5752	40	4.9	196	0.4554
MAY	69.95	5782	30	4.9	147	0.4759
JUNE	62.07	5808	26	4.885	127	0.4887
JULY	52.62	5829	21	4.905	103	0.5109
AUG	52.62	5850	21	4.905	103	0.5109
SEPT	58.53	5874	24	4.917	118	0.496
OCT	66.01	5902	28	4.893	137	0.4818
NOV	73.71	5943	41	3.829	157	0.4695
DEC	114.26	5987	44	5.909	260	0.4395
Totals\$	982.33					
YEAR	1995					
	\$ USAGE	Meter	Delta	X =	CCF	PER CCF
JAN	131.45	6049	62	4.903	304	0.4324
FEB	120.06	6105	56	4.911	275	0.4366
MAR	108.74	6155	50	4.9	245	0.4438
APR	100.59	6201	46	4.891	225	0.4471
MAY	67.98	6230	29	4.897	142	0.4787
JUNE	61.97	6256	26	4.885	127	0.488
JULY	54.59	6278	22	4.909	108	0.5055
AUG	22.61	6285	7	4.857	34	0.665
SEPT	43.9	6302	17	4.882	83	0.5289
OCT	68.09	6331	29	4.897	142	0.4795
NOV	67.98	6360	29	4.897	142	0.4787
DEC	78.02	6394	34	4.912	167	0.4672
Totals\$	925.98					

B.I. Gas Bills

YEAR	1996					
	\$ USAGE	Meter	Delta	X =	CCF	PERCCF
JAN	130.17	6455	61	4.902	299	0.4354
FEB	69.89	6485	30	4.9	147	0.4754
MAR	108.27	6535	50	4.9	245	0.4419
APR	71.86	6566	31	4.903	152	0.4728
MAY	56.69	6589	23	4.913	113	0.5017
JUNE	54.67	6611	22	4.909	108	0.5062
JULY		6629	18	#####	unk	unk
AUG	33.45	6641	12	4.917	59	0.5669
SEPT	41.7	6657	16	4.875	78	0.5346
OCT	54.38	6679	22	4.909	108	0.5035
NOV	295.17	6829	150	4.9	735	0.4016
DEC	6.6	6829	0	#####	0	#DIV/0!
Total\$	922.85					
YEAR	1997					
	\$ USAGE	Meter	Delta	X =	CCF	PERCCF
JAN	0	6829	0	#####	0	unk
FEB	43.76	6846	17	4.882	83	0.5272
MAR	98.67	6891	45	4.911	221	0.4465
APR	73.47	6923	32	4.906	157	0.468
MAY	45.93	6941	18	4.889	88	0.5219
JUNE	41.6	6957	16	4.875	78	0.5333
JULY	31.15	6968	11	4.909	54	0.5769
AUG	33.37	6980	12	4.917	59	0.5656
SEPT	33.3	6992	12	4.917	59	0.5644
OCT	31.12	7003	11	4.909	54	0.5763
NOV	122.83	7061	58	4.897	284	0.4325
DEC	6.6	7061	0	#####	0	#DIV/0!
Total\$	561.8					

B.I. Gas Bills

YEAR	1998						
	\$ USAGE	Meter	Delta	X =	CCF	PER CCF	
JAN	50.13	7081	20	4.9	98	0.5115	
FEB	92.4	7123	42	4.905	206	0.4485	
MAR	84.53	7161	38	4.895	186	0.4545	
APR	86.4	7200	39	4.897	191	0.4524	
MAY	31.07	7211	11	4.909	54	0.5754	
JUNE	15.45	7215	4	5	20	0.7725	
JULY	37.59	7229	14	4.929	69	0.5448	
AUG	28.79	7239	10	4.9	49	0.5876	
SEPT	29.04	7249	10	4.9	49	0.5927	
OCT	26.86	7258	9	4.889	44	0.6105	
NOV	30.94	7272	14	1	14	2.21	
DEC	43.67	7297	25	0.8	20	2.1835	
Total\$	556.87						
YEAR	1999						
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JAN	53.43	7317	20	1.25	25	2.1372	
FEB	59.36	7345	28	1	28	2.12	
MAR	39.55	7363	18	1	18	2.1972	
APR	55.51	7389	26	1	26	2.135	
MAY	16.11	7396	7	1	7	2.3014	
JUNE	22.49	7406	10	1	10	2.249	
JULY	11.25	7411	5	1	5	2.25	
AUG	33.58	7406	-5	-0.8	4	8.395	
SEPT	8.69	7415	9	0.444	4	2.1725	
OCT	23.49	7424	9	1	9	2.61	
NOV	26.01	7434	10	1	10	2.601	
DEC	46.16	7452	18	1	18	2.5644	
Total\$	395.63						

D

1710 N. Mastick Way
P.O. Box 280
Nogales, Arizona 85628-0280
520.281.1212



February 23, 2001

Pete Goshia
P.O. Box 4188
Tubac, Az 85646-4188

Ref: Burro Inn

Dear Mr. Goshia;

In response to your letter dated November 1, 200, you have made several inquiries regarding your electric account:

- A) Corrected billings for demand charges on 3 months billing June, July and August 1999 all show on one bill thus showing three basic charges, your 3 months energy charges, demand charges, dusk to dawn lights and gas charges. I am enclosing a breakdown for your records that show all 3 months charges and credits. Our system at the time of adjusting any account will go back and credit all charges and then rebill the services to make the necessary credits which in this case was the demand charges.
- B) The corrected bill shows six dusk to dawn lights being charged since we bill you 2 lights a month and we are correcting 3 months equals 6 lights.
- C) You are requesting copies of all tariffs of which have already been provided to you.
- D) You question the gas billing being in error, I am providing a spreadsheet showing the tariff and recalculation of your bills I am unable to go all the way back to 1992 but am doing the ones that I have on the system currently. Your gas meter has a multiplier of 4.9020 to determine consumption in CCF's and the billing is done in therms and the therm conversion changes every month, which is noted on your monthly statement.
- E) Your question of whom programs the meters for Citizens that would be Eddie Jimenez our journeyman meterman. The manufacturer does not provide charts listing the valid multipliers as this is based on the service to which the meter will be used on. This is determined at the time of connecting your service. Your service and the meter was checked by the Arizona Corporation commission and our meterman and it was determined that the multiplier was correct.
- F) Your letter states that the ACC regulations Citizens should have a chart visible to its customers listing all valid multipliers for meters I believe that this is an invalid statement as nothing in the tariff requires such.
- G) You are requesting a signed affidavit from our engineer or the responsible person on how the constants are set in the meter the ACC sent you a letter stating we could not do this. I am enclosing a copy of the letter.

H) I am enclosing a copy of the chart Eddie sent you along with the meter test showing the wiring of the meter.

I hope that all the information I am providing will help you in solving any questions you may still have regarding your account. I am also enclosing all the copies of the letters that I had sent you previously and also the letters that were sent to you by the Arizona Corporation Commission. If you have any questions regarding the enclosed please leave me a message on my telephone as I will be out of the office for two weeks but I will be glad to get back to you as soon as I return the week of March 5th.

Sincerely,



Amanda Rivero
Citizens Energy Service Representative