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ATTORNEYS AT LAW

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TODD C. WILEY
DIRECT DIAL: (602) 530-8514
E-MAIL: TCW@GKNET.COM

AZ CORP COMMISSION
DOCUMENT CONTROL

2575 EAST CAMELBACK ROAD
PHOENIX, ARIZONA 85016-9225
PHONE: (602) 530-8000
FAX: (602) 530-8500
WWW.GKNET.COM

July 24, 2001

VIA HAND DELIVERY

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Re: *Sun City Water Company's and Sun City West Utilities Company's
Notice of Errata
Docket Nos. W-01656A-98-0577 and SW-02334A-98-0577*

Dear Sir/Madam:

Enclosed is Sun City Water Company's and Sun City West Utilities Company's
Notice of Errata regarding page 2 of the Motion to Strike filed July 23, 2001 which was
inadvertently omitted.

Very truly yours,

GALLAGHER & KENNEDY, P.A.

By: 
Todd C. Wiley

3099-0043/943404

Arizona Corporation Commission

DOCKETED

JUL 24 2001

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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

IN THE MATTER OF THE JOINT APPLICATION
OF SUN CITY WATER COMPANY AND SUN
CITY WEST UTILITIES COMPANY FOR
APPROVAL OF CENTRAL ARIZONA PROJECT
WATER UTILIZATION PLAN AND FOR AN
ACCOUNTING ORDER AUTHORIZING A
GROUNDWATER SAVINGS FEE AND
RECOVERY OF DEFERRED CENTRAL ARIZONA
PROJECT EXPENSES.

Docket Nos.: W-01656A-98-0577
SW-02334A-98-0577

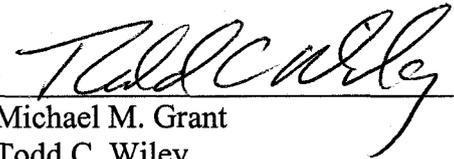
**SUN CITY WATER COMPANY'S
AND SUN CITY WEST
UTILITIES COMPANY'S
NOTICE OF ERRATA**

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

Sun City Water Company and Sun City West Utilities Company hereby gives
notice that page 2 of the Motion to Strike, filed with the Arizona Corporation Commission on
July 23, 2001, was inadvertently omitted. A copy of the missing page 2 is attached hereto.

DATED this 24 day of July, 2001.

GALLAGHER & KENNEDY, P.A.

By 
Michael M. Grant
Todd C. Wiley
2575 East Camelback Road
Phoenix, Arizona 85016-9225
Attorneys for Citizens Communications
Company

Original and ten copies filed this
24th day of July, 2001, with:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

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

1 Copy of the foregoing faxed and
mailed this 8th day of July, 2001 to:

2 Jane Rodda (520/628-6559)
3 Arizona Corporation Commission
400 West Congress Street
4 Tucson, Arizona 85701-1347

5 Scott Wakefield (602/285-0350)
RUCO
Suite 1200
6 2828 North Central Avenue
Phoenix, Arizona 85004

7 Janet Wagner (602/542-4870)
8 Arizona Corporation Commission
1200 West Washington
9 Phoenix, Arizona 85007

10 Deborah Scott (602/542-2129)
Utilities Division
Arizona Corporation Commission
11 1200 West Washington
Phoenix, Arizona 85007

12 Walter W. Meek (602/254-4300)
13 Arizona Utility Investors Association
Suite 210
14 2100 North Central Avenue
Phoenix, Arizona 85004

15 Paul R. Michaud (602/266-8290)
16 Martinez & Curtis
2712 North 7th Street
Phoenix, Arizona 85006-1090
17 Attorneys for Sun City Taxpayers Association

18 Ray Jones (623/815-3141)
General Manager
19 Sun City Water Company
Post Office Box 1687
20 Sun City, Arizona 85372

21

22

1 William G. Beyer (623/434-5834)
5632 West Alameda Road
2 Glendale, Arizona 85310
Attorneys for Recreation Centers of Sun City
3 and Recreation Centers of Sun City West

4 By: Linda Magiera
3099-0043/943390

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

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1 Agua Fria Division including the timeframe for any such joint facility;” (2) “the need for all
2 major elements of [the] proposed plan (e.g., storage and booster stations);” and (3) “binding
3 commitments from golf courses, public and private, and terms and conditions related thereto.”

4 See Decision No. 62293, pp. 20-21. *Those three issues are what the August 15 hearing is about.*

5 Put another way, the only issues presented for review are whether Citizens
6 conducted an adequate engineering analysis to determine the feasibility of a joint project with the
7 Agua Fria Division and the need for major elements of the GSP; and, whether Citizens obtained
8 binding commitments from the golf courses. Nothing more, nothing less. Throughout this case,
9 however, SCTA and RUCO have attempted to debate, reopen and collaterally attack numerous
10 issues definitively decided by the Commission in Decision Nos. 60172 and 62293.

11 Continuing that tactic, SCTA and RUCO have proffered testimony from Dennis
12 Hustead and Marylee Diaz Cortez challenging the Commission’s decision to approve the concept
13 of the Groundwater Savings Project recommended by the CAP Task Force for various reasons.

14 As a matter of law and fact, the Hearing Officer should strike substantial portions of Mr.
15 Hustead’s direct testimony and all of Ms. Cortez’s supplemental testimony because they exceed
16 the proper scope of this docket, raise issues previously decided by final Commission decisions,
17 ignore the bounds of the open meeting remand and have no bearing on the limited PER issues at
18 stake in this proceeding.

19 **II. THE HEARING OFFICER SHOULD PREVENT SCTA AND RUCO FROM**
20 **EXCEEDING THE SCOPE OF CITIZENS’ PRELIMINARY ENGINEERING REPORT**
21 **AND CHALLENGING ISSUES ALREADY DECIDED BY THE COMMISSION.**

22 In Decision No. 62993 (issued February 1, 2000), the ACC approved the concept
of the GSP as a means for Citizens to utilize its CAP water allocations in the Sun Cities. As part
of that decision, the ACC required Citizens to submit a preliminary engineering report (“PER”)
focusing on three issues: (1) the feasibility of a joint facility with Citizens’ Agua Fria division;