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AND
ROCA
LLP
LAWYERS

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RECEIVED

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2006 AUG - 9 P 3:41

Our File Number: 46443-00001

August 7, 2006

AZ CORP COMMISSION
DOCUMENT CONTROL

Via Overnight Courier

Del Smith, Engineering Supervisor
Utilities Division
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007-2927

Arizona Corporation Commission

DOCKETED

AUG - 9 2006

DOCKETED BY
NR

Re: Response to June 9, 2006 Insufficiency Letter
Docket Nos. **W-01898A-06-0326** and **W-20460A-06-0326**

Harold & Mary Frarer dba F & F Water Company
Application for Sale of Assets/Transfer of CC&N to St. David Springs, L.L.C.

Dear Mr. Smith:

On behalf of St. David Springs, LLC, which proposes to purchase the utility assets of the F&F Water Company, I am writing to supplement the response sent to you by Harold Frarer on June 27, 2006, a copy of which I've included with this letter for your convenience.

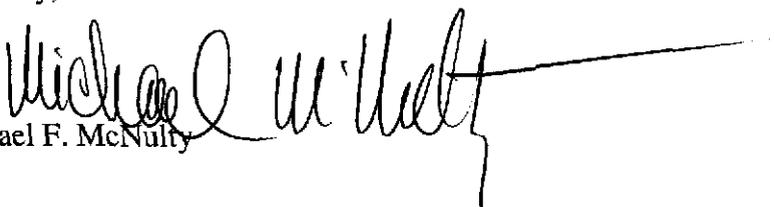
Among other items requested in your letter of June 9, 2006, you requested the name and identity of the Certified Operator of the F & F Water Company. While the existing utility has too few customers to be required, under ADEQ regulations, to engage the services of a Certified Operator, it is the intent of St. David Springs to grow the utility to meet future water demands in the St. David area, as will be discussed at the hearing that the Commission will eventually schedule in this matter. Consequently, St. David Springs fully intends to engage the services of a Certified Operator if the Commission approves its acquisition of the assets of the F & F Water Company.

Additionally, you requested information on the status of the water company's use of public rights of way. On July 6, 2006, St. David Springs sent its application for a franchise to the Cochise County Board of Supervisors. We have been advised that action on our application will be taken within the next two weeks, and that a hearing on which will be scheduled by the Board on a date two or three weeks thereafter. We will forward the final, approved Cochise County Franchise as soon as it is publicly available.

Finally, enclosed, please find the requested Certificate of Good Standing from the Arizona Corporation Commission for St. David Springs, L.L.C.

Please let us know if there is any further information that you would find useful, that may be provided to you by St. David Springs, L.L.C.

Sincerely,


Michael F. McNulty

MFM/hib

cc: Docket Control
Blessing Chukwu
Lyn Farmer
Brian Bozzo
Diana L. Dessy
Harold Frarer

STATE OF ARIZONA



Office of the
CORPORATION COMMISSION

CERTIFICATE OF GOOD STANDING

To all to whom these presents shall come, greeting:

I, Brian C. McNeil, Executive Director of the Arizona Corporation Commission, do hereby certify that

*****ST. DAVID SPRINGS, L.L.C.*****

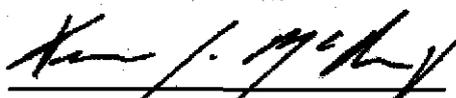
a domestic limited liability company organized under the laws of the State of Arizona, did organize on the 30th day of March 2006.

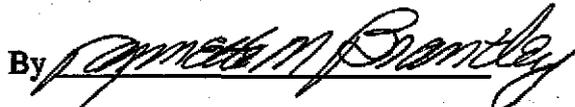
I further certify that according to the records of the Arizona Corporation Commission, as of the date set forth hereunder, the said limited liability company is not administratively dissolved for failure to comply with the provisions of A.R.S. section 29-601 et seq., the Arizona Limited Liability Company Act; and that the said limited liability company has not filed Articles of Termination as of the date of this certificate.

This certificate relates only to the legal existence of the above named entity as of the date issued. This certificate is not to be construed as an endorsement, recommendation, or notice of approval of the entity's condition or business activities and practices.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the Arizona Corporation Commission. Done at Phoenix, the Capital, this 19th Day of June, 2006, A. D.




Executive Director

By 

June 27, 2006

Mr. Del Smith
Arizona Corporation Commission
400 West Congress Street
Tucson, Arizona 85701-1347

Dear Mr. Smith,

This is response to letter dated June 9, 2006 for F & F Water Company. The following information is what you requested:

1. F & F Water Company has 2 customers and as such is not subject to ADEQ requirements.
2. This is not applicable for F & F Water Company.
3. ADEQ does not regulate F & F Water Company.
4. This is not applicable for F & F Water Company.
5. F & F Water Company is on own land and not on public right-of-way.
6. F & F Water Company is a partnership and not a corporation and is not regulated by Corporations Division of the Commission.
7. Have notified Michael F. McNulty attorney for St. David Springs, L.L.C. about Letter of Good Standing.

Please let me know if there are any other questions concerning this matter.

Sincerely, 

Harold W. Frarer

June 9, 2006

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Company Name: dba F & F Water Co.
ADEQ Public Water System Number:

WATER COMPANY PLANT DESCRIPTION

WELLS

ADWR ID Number*	Pump Horsepower	Pump Yield (gpm)	Casing Depth (Feet)	Casing Diameter (inches)	Meter Size (inches)	Year Drilled
				12		1958

* Arizona Department of Water Resources Identification Number

OTHER WATER SOURCES

Name or Description	Capacity (gpm)	Gallons Purchased or Obtained (in thousands)

BOOSTER PUMPS

Horsepower	Quantity

FIRE HYDRANTS

Quantity Standard	Quantity Other

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STORAGE TANKS	
Capacity	Quantity
1	10,000

PRESSURE TANKS	
Capacity	Quantity
1	

June 9, 2006
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Company Name: dba F & F Water Co.
ADEQ Public Water System Number:

WATER COMPANY PLANT DESCRIPTION CONTINUED

MAINS

Size (in inches)	Material	Length (in feet)
2		
3		
4		
5		
6		
8		
10		
12		

CUSTOMER METERS

Size (in inches)	Quantity
5/8 x 3/4	
3/4	
1	
1 1/2	
2	
Comp. 3	
Turbo 3	
Comp. 4	
Turbo 4	
Comp. 6	
Turbo 6	

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For the following three items, please list the utility owned assets in each category.

TREATMENT EQUIPMENT:

STRUCTURES:

ONE WATER STORAGE TANK - APPROXIMATELY 10,000 GALLON
ONE WATER EXPANSION TANK
ONE GAS ENGINE
ONE ELECTRIC EXPANSION TANK MOTOR ATTACHED TO WATER TANK
ONE WATER GEAR HEAD PUMP ATTACHED TO WELL & ENGINE

OTHER:

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WATER USE DATA SHEET

Company Name: dba F & F Water Co.
ADEQ Public Water System Number:

MONTH/YEAR (Most recent 12 Months Available)	NUMBER OF CUSTOMERS	GALLONS SOLD (Thousands)	GALLONS PUMPED* (Thousands)	GALLONS PURCHASED* (Thousands)
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
TOTAL	N/A			

June 9, 2006

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Is the water utility located in an ADWR Active Management Area ("AMA")?

YES NO

Does the Company have an ADWR gallons per capita day ("GPCD") requirement?

YES NO

If Yes, please provide the GPCD amount: _____

Note: If you are filing for more than one system, please provide separate data sheets for each system. For explanation of any of the above, please contact the Engineering Supervisor at 602-542-7277.

** The total of gallons pumped and gallons purchased should not equal or be less than the gallons sold.*