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ARIZONA CORPORATION COMMISSION

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October 12, 2006

AZ CORP COMMISSION
DOCUMENT CONTROL

Mr. Michael F. McNulty
Lewis and Roca, LLP
One South Church Avenue, Suite 700
Tucson, Arizona 85701-1611

RE: Spanish Trail Water Company and Saguaro Water Company – Application to modify their existing Certificate of Convenience and Necessity (CC&N) Docket No. W-01816A-06-0177 and W-01790A-06-0177
SUFFICIENCY LETTER

Dear Mr. McNulty:

In reference to the above mentioned application filed on March 17, 2006, and the supporting documents filed on May 26, 2006, and September 14, 2006, this letter is to inform you that the application has met the sufficiency requirements as outlined in the Arizona Administrative Code (“A.A.C.”).

Pursuant to the A.A.C. R14-2-411(C), the Commission has 150 calendar days for its substantive review. This includes conducting a hearing and preparing a proposed Opinion and Order to present to the Commission at an Open Meeting.

If you have any questions concerning this matter, please do not hesitate to contact me at 602-542-0840 and Jian Liu at 602-542-7272.

Very truly yours,

Blessing N. Chukwu
Executive Consultant III

BNC

cc: Docket Control
Del Smith
Lyn Farmer
Brian Bozzo
Vicki Wallace

Arizona Corporation Commission
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