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March 2, 2007

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**CERTIFIED MAIL**

Mr. Graham Symmonds  
Global Water Management  
22601 North 19<sup>th</sup> Avenue, Suite 210  
Phoenix, Arizona 85027

Arizona Corporation Commission  
**DOCKETED**

**MAR -2 2007**

DOCKETED BY

**THIRD INSUFFICIENCY LETTER**

Dear Mr. Symmonds:

The application of the Water Utility of Greater Tonopah, Inc. ("WUGT" or "the Company"), for an extension of its Certificate of Convenience and Necessity ("CC&N"), Docket No. W-02450A-06-0626 has not met the sufficiency requirements as outlined in the Arizona Administrative Code ("A.A.C.").

Staff is concerned that WUGT has not fully complied with Decision Nos. 68307 and 68452 which address the current systems. Before Staff can recommend approval of an extension of WUGT's service, it needs to have sufficient information to assure the Commission that based upon service in its current service territory to its current customers, the Company is fit and proper to extend its CC&N. To address these concerns, please provide the following information:

- 1) Provide the current arsenic concentration of each well currently serving WUGT existing systems.
- 2) Provide the status of the loan funds for which approval was received in Decision No. 68452, dated February 2, 2006.
- 3) Provide a list of the arsenic-related assets purchased with those funds or other funds.
- 4) Based on the data submitted by WUGT, Staff concludes that three existing water systems (Dixie/PWS#07-030, Garden City/PWS#07-037 and Sunshine PWS#07-071) lack adequate storage capacity to serve the existing customer base. Provide information showing that this does not violate previous Commission decisions and provide the Company's plans to resolve the storage capacity problems.

Mr. Graham Symmonds

Page 2

- 5) Please reconcile the following:
- a) The application states the acreage of the extension area is 22,127 acres. Table 4-1 of the Master Plan indicates there are 22,728 acres.
  - b) The application Exhibits 7 & 8 indicates 88,264 DU in the extension area. Table 4-1 of the Master Plan indicates there will be 105,915 units, assuming that there are 8,219 DU in Silver Spring Ranch referenced in the application for a CC&N extension for Hassayampa Utility CC&N Extension. Please revise the Engineering Memorandum accordingly.
- 6) Please submit Exhibit 4.2 (Typical Site Layout System) referenced in the Master Plan and a map that clearly shows layout of the proposed water infrastructure.

Pursuant to the A.A.C. R14-2-212.E.5., the Commission has 150 calendar days to approve or reject this application after it is deemed sufficient. This time period will encompass a hearing, a Recommended Opinion and Order and a Decision from the Commission.

If you have any questions concerning this matter, please do not hesitate to contact me at 602-542-0859 or Katrin Stukov at 602-542-0941.

Yours truly,



Linda A. Jaress  
Executive Consultant III

LAJ:tdp

cc: Docket Control  
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