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Arizona Corporation Commission
Attn: Mr. Ernest G. Johnson
1200 W. Washington Street
Phoenix, AZ 85007-2927

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Arizona Corporation Commission
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RE: RSW-00000A-07-0051 Sewer Rulemaking

Dear Mr. Johnson,

Pursuant to your letter dated March 6, 2007, please find enclosed our comments to the proposed changes for sewer:

- R14-2-602(A)(2)(h): When we had to estimate our annual operating revenues and expenses for the first five years of operation we were estimating on a plant that had not yet been constructed. We used a rate accountant who gave us our numbers based on the information we supplied to the ACC. What kind of back-up documentation is the ACC looking for?
- R14-2-602(A)(2)(n): Is the intent of the application notice provision to obtain a written notice from every property owner? In our experience, we have received notices for many different things and unless we had some kind of issue, we typically do not respond. I believe this could become very time consuming especially if you are dealing with many property owners. We could send the notice via certified mail to confirm that they did in fact receive our notice. Other than that, I really do not believe that many landowners will respond if they have no issue with the notice even if they are encouraged or even asked to do so.

These were the only two items that really popped out at me and it is quite possible that I am not reading them as they were intended to be interpreted. I appreciate the opportunity to comment on the proposed changes and hope that I was of some assistance. If you need anything further from me, please do not hesitate to contact me.

Sincerely,

Colleen Verville

Entrada Del Oro Sewer Company

Grosvenor Holdings, L.C.