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AZ CORP COMMISSION
DOCKET CONTROL

June 23, 2007

Blessing Chukwu
Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Re: Response to Staff's 3rd Insufficiency Letter dated May 8, 2007
Docket No. W-01212A-06-0666/W-02451A-06-0666

Dear Ms. Chukwu:

Enclosed please find the responses of Valencia Water Company and Water Utility of Greater Buckeye, Inc. to Staff's Insufficiency Letter dated May 8, 2007 in this docket.

Sincerely,

Timothy J. Sabo

TJS:da
Enclosure
cc: Docket Control

Arizona Corporation Commission
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DOCKETED BY

**VALENCIA WATER COMPANY, INC. AND
WATER UTILITY OF GREATER BUCKEYE, INC.'S
RESPONSES TO STAFF'S INSUFFICIENCY LETTER
DATED MAY 8, 2007
DOCKET NOS. W-01212A-06-0666 AND W-02451A-06-0666**

1. According to MCESD Compliance Status Reports, WUGB's two water systems: Sweetwater II/PWS# 07-129 and Bulfer/Primrose/PWS#07-0114 are in **Substantial** Compliance (see attached reports).

Therefore, the company should resolve all deficiencies and submit an updated MCESD Compliance Status Report confirming **full** compliance status.

RESPONSE: As the ACC is aware, Maricopa County Environmental Services Department (MCESD) is delegated by the ADEQ to manage and enforce State Safe Drinking Water Standards per AAC R-18-04. The MCESD Public Water System Compliance Status Report ("Compliance Report") form asks three key questions regarding system deficiencies, as follows:

- (1) Does the system have major treatment plant deficiencies?
- (2) Does the system have major O&M deficiencies?
- (3) Does the system have water quality monitoring/reporting deficiencies?

The referenced Compliance Reports for the Sweetwater 2 and Bulfer Primrose systems, dated 4/19/07 and 3/8/07 respectively, do in fact confirm that there are NO deficiencies in either system, with the answer to the 3 relevant questions being "NO".

The Compliance Report asks one final question of the MCESD reviewer, as follows:

General Public Water System Compliance Status?

For both Sweetwater 2 and Bulfer Primrose, the referenced reports show the answer to this question as "Substantial Compliance". According to our discussions with John Kolman, Manager of the Drinking Water Program, the term "substantial" is applied whenever there are known activities planned or underway to address a temporal issue such as, in the case of Sweetwater 2, the actions initiated by WUGB to address concerns with nitrate concentrations approaching actionable levels. While the PWS is indeed not deficient in meeting water quality or system requirements, the fact that it is in the process of performing additional sampling, implementing a new backflow prevention program or a blending plan, for example, imposes upon the MCESD according to its internal policies to add the term "substantial" to its finding of compliance.

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WUGB has been in frequent contact with Mr. Kolman's office regarding the compliance status of the subject systems. As of this date, we expect an updated Compliance Report for Bulfer Primrose that will show "compliance". Also, given the construction and monitoring activities at Sweetwater 2 to make permanent the connection with the City of Goodyear thus enabling and formalizing our approved blending plan, we anticipate that an MCESD inspection at the end of July 2007 will yield "compliance" as well.

We respectfully submit this information as evidence that there are no deficiencies for either system, and that we are proactively working with MCESD to eliminate the need for the term "substantial" on the Compliance reports for these systems, by virtue of the completion of temporal system improvements and/or activities.

RESPONDENT: Graham Symmonds, SVP Regulatory and Compliance