

ORIGINAL



0000073626

COMMISSIONERS

1
2 **Mike Gleason, Chairman**
3 **William A. Mundell**
4 **Jeff Hatch-Miller**
5 **Kristin K. Mayes**
6 **Gary Pierce**

RECEIVED

2007 JUN -1 P 4:41

AZ CORP COMMISSION
DOCKET CONTROL

57

7 **BEFORE THE ARIZONA CORPORATION COMMISSION**

9 ARIZONA WATER COMPANY, an Arizona
10 corporation,

11 Complainant,

12 vs.

13
14 GLOBAL WATER RESOURCES, LLC, a
15 foreign limited liability company; GLOBAL
16 WATER RESOURCES, INC., a Delaware
17 corporation; GLOBAL WATER
18 MANAGEMENT, LLC, a foreign limited
19 liability company; SANTA CRUZ WATER
20 COMPANY, LLC, an Arizona limited liability
21 corporation; PALO VERDE UTILITIES
22 COMPANY, LLC, an Arizona limited liability
23 corporation; GLOBAL WATER - SANTA
24 CRUZ WATER COMPANY, an Arizona
25 corporation; GLOBAL WATER - PALO
26 VERDE UTILITIES COMPANY, an Arizona
27 corporation; JOHN AND JANE DOES 1-20;
28 ABC ENTITIES I - XX,

Respondents.

DOCKET NOS.

W-01445A-06-0200

SW-20445A-06-0200

W-20446A-06-0200

W-03576A-06-0200

SW-03575A-06-0200

**NOTICE OF RULE 30(b)(6)
DEPOSITION OF THE GLOBAL
ENTITIES**

Arizona Corporation Commission
DOCKETED

JUN -4 2007

DOCKETED BY nr

26 **YOU ARE HEREBY NOTIFIED** that, pursuant to Rules 26 and 30, Arizona
27 Rules of Civil Procedure, the deposition will be taken upon oral examination of the
28 person(s) named below at the time and place stated before an officer authorized by law to

BRYAN CAVE LLP
TWO NORTH CENTRAL AVENUE, SUITE 2200
PHOENIX, ARIZONA 85004-4406
(602) 364-7000

1 administer oaths. A general description of the person(s) from whom testimony is requested,
2 sufficient to identify such person(s), is given below.

3
4 **PERSON TO BE EXAMINED:** GLOBAL WATER RESOURCES, LLC;
5 GLOBAL WATER RESOURCES, INC.;
6 GLOBAL WATER MANAGEMENT,
7 LLC; SANTA CRUZ WATER
8 COMPANY, LLC; PALO VERDE
9 UTILITIES COMPANY, LLC; GLOBAL
10 WATER - SANTA CRUZ WATER
11 COMPANY; GLOBAL WATER - PALO
12 VERDE UTILITIES COMPANY
13 (collectively, the "Global Entities")

14 **DATE OF DEPOSITION:** June 18, 2007

15 **TIME OF DEPOSITION:** 9:30 a.m.

16 **PLACE OF DEPOSITION:** Bryan Cave LLP
17 Two North Central Avenue, Suite 2200
18 Phoenix, Arizona 85004

19 Pursuant to Rule 30(b)(6) of the Arizona Rules of Civil Procedure, the Global
20 Entities are requested to identify the person or persons most knowledgeable to testify and
21 provide information on the following topics:

- 22 1. Identification of all property owners contacted in any way (personal visit, mail,
23 correspondence, email, telephone, advertisement or other communication calculated
24 to elicit a response) by the Global Entities or any company, entity, or person
25 affiliated with, employed by, or acting on their behalf to discuss that property
26 owner's entry into an Infrastructure Coordination and Financing Agreement
27 ("ICFA") or similar agreement, and the details and result of each such contact.
- 28 2. An accounting of all monies or other consideration received or to be received by any
of the Global Entities under or related to any ICFA.
3. Identification of all municipalities, counties or other governmental, quasi-
governmental or non-governmental entities or organizations contacted in any way
(personal visit, mail, correspondence, email, telephone, advertisement or other action
calculated to elicit a response) by any of the Global Entities or their representatives
or agents to discuss that entity's or organization's entry into a so-called Private
Public Partnership ("P3"), Memorandum of Understanding ("MOU") or agreement to
similar effect, and the details and result of each such contact.

- 1
- 2 4. An accounting of all monies or other consideration paid, or to be paid, by any of the
- 3 Global Entities under or related to any P3 or MOU.
- 4 5. An identification of all utilities or public service corporations in Arizona which any
- 5 of the Global Entities have acquired or sought to acquire, including but not limited to
- 6 any stock purchases of any amount in any utility or public service corporation, and an
- 7 accounting of all monies or other consideration paid or offered to be paid for such
- 8 acquisition.
- 9 6. An identification of each "affiliate" and "holding company" of the Global Entities, as
- 10 those terms are defined in A.A.C. R 14-2-801.
- 11 7. An identification and description of all transfers of ownership interests in any of the
- 12 Global Entities made within the last ten (10) years.
- 13 8. For each system owned or operated by any of the Global Entities, over the past five
- 14 years, a description of the (i) quantity and dollar amount of reclaimed water sold, (ii)
- 15 quantity of water recharged, (iii) quantity and dollar amount of surface water sold,
- 16 (iv) the quantity and dollar amount of groundwater pumped and sold per customer,
- 17 and (v) the quantity, dollar amount, and description of all other water sold.
- 18 9. An explanation of financial statements of each of the Global Entities, as well as the
- 19 reports provided by any of the Global Entities under A.A.C. R14-2-805 for each of
- 20 the last five years.
- 21 10. An explanation of the financing available to and used by the Global Entities over the
- 22 past five years.
- 23 11. An identification and detailed description of all common or shared facilities that any
- 24 of the Global Entities use to provide water, wastewater and reclaimed water services
- 25 in their service areas, including common or shared employees or independent
- 26 contractors that any of the Global Entities use to provide such services, and a
- 27 description and calculation of the amounts of the annual savings each of the regulated
- 28 Global Entities has realized by operating as an integrated water and sewer provider
- for each of the last three years.
12. An identification of the CAP allocation of each Global Entity, the date the allocation
- was obtained, and the quantity of treated and untreated CAP water sold to customers
- by any Global entity for the last five years.

- 1 13. An identification of all sources of non-CAP surface water for each of the Global
2 Entities and the quantity of each source available for the years 2007 through 2011, by
3 year.
4 14. A description of all regulated water and wastewater utilities owned in whole or in
5 part by any of the Global Entities, and a detailed description of the current CCN map
6 for each entity, and the circumstances of acquisition of each.
7 15. A description of the background and experience of the managers and operators of the
8 Global Entities' utilities, as well as that of the deponent(s), in managing, directing
9 and developing water and wastewater utilities and facilities.

10 DATED this 1st day of June, 2007.

11 BRYAN CAVE LLP

12 By 

13 Steven A. Hirsch, #006360
14 Rodney W. Ott, #016686
15 Two N. Central Avenue, Suite 2200
16 Phoenix, AZ 85004-4406
17 Attorneys for Arizona Water Company

18 **ORIGINAL and 13 COPIES** of the foregoing
19 filed this 1st day of June, 2007 with:

20 Docket Control Division
21 Arizona Corporation Commission
22 1200 W. Washington
23 Phoenix, AZ 85007

24 **COPY** of the foregoing hand-delivered
25 this 1st day of June, 2007 to:

26 Dwight D. Nodes
27 Administrative Law Judge
28 Hearing Division
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Christopher Kempley, Esq.
Chief Counsel, Legal Division
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

Ernest G. Johnson
Director, Utilities Division
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

COPY of the foregoing mailed and e-mailed
this 15 day of June, 2007 to:

Michael W. Patten, Esq.
Timothy J. Sabo, Esq.
Roshka DeWulf & Patten, PLC
One Arizona Center
400 E. Van Buren St., Suite 800
Phoenix, AZ 85004
Attorneys for Respondents

Melinda M. Erway