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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

Arizona Corporation Commission

DOCKETED

SEP - 3 2008

MIKE GLEASON, Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
KRISTIN K. MAYES
GARY PIERCE

DOCKETED BY *mm*

IN THE MATTER OF THE REQUEST OF THE
DIAMOND VALLEY WATER DISTRICT TO
OBTAIN THE ASSETS OF THE DIAMOND
VALLEY WATER USERS CORPORATION.

DOCKET NO. W-03263A-07-0244

DECISION NO. 70483

OPINION AND ORDER

DATE OF HEARING:

November 16, 2007

PLACE OF HEARING:

Phoenix, Arizona

ADMINISTRATIVE LAW JUDGE:

Dwight D. Nodes

IN ATTENDANCE:

Kristin K. Mayes, Commissioner

APPEARANCES:

Mr. Jim Morgan, Mr. Dean Briggs, Mr. Daniel Chapman and Ms. Susan Echenrode, on behalf of Diamond Valley Water District;

Mr. Kevin Greif, intervenor, in propria persona; and

Mr. Charles Hains, Staff Attorney, Legal Division, on behalf of the Utilities Division of the Arizona Corporation Commission.

BY THE COMMISSION:

On April 13, 2007, the above-captioned docket was opened by the Arizona Corporation Commission ("Commission") as a place holder for the expected request by the Diamond Valley Water District ("District") to obtain the assets of the Diamond Valley Water Users Corporation ("D VWUC" or "Company").

On April 13, 2007, the District filed a Letter of Intent to accept the transfer of the D VWUC assets, including a list of terms that were expected to accompany the proposed transfer.

On April 27, 2007, the Commission's Utilities Division Staff ("Staff") filed a letter that was sent to the District in response to the Letter of Intent.

1 On May 30, 2007, the District filed a letter in response to Staff's April 27, 2007 letter.

2 On June 22, 2007, Staff filed a responsive letter sent to the District.

3 On September 13, 2007, the District filed a letter stating that it is prepared to go forward with
4 the acquisition of the DVWUC assets and requesting that the Commission approve the transfer.

5 On September 17, 2007, Staff filed a Request for Procedural Conference.

6 On September 19, 2007, a Procedural Order was issued scheduling a procedural conference
7 for September 26, 2007.

8 On September 26, 2007, a procedural conference was held, as scheduled.

9 By Procedural Order issued October 1, 2007, an evidentiary hearing was scheduled for
10 November 16, 2007, and the Company was directed to publish notice of the hearing and mail to each
11 of its customers a copy of the required notice.

12 On October 26, 2007, Staff filed its Staff Report recommending approval of the transfer of the
13 Company's assets to the District.

14 On November 1, 2007, Kevin Greif filed a Motion to Intervene and a Data Request to the
15 Commission and to the Company's interim operator. Mr. Greif was granted intervention at the
16 hearing.

17 The evidentiary hearing was held, as scheduled, on November 16, 2007. During the hearing,
18 Staff was directed to prepare a further report regarding the Company's assets and liabilities, as well
19 as an analysis of engineering reconstruction of the system.

20 On November 20, 2007, the District filed various documents in response to requests made at
21 the hearing.

22 On December 19, 2007, Staff filed a Memorandum containing an evaluation of the
23 Company's assets and liabilities, including an assessment of the DVWUC computer and software,
24 and customer deposits.

25 On December 24, 2007, Mr. Greif filed a Second Data Request to the Commission and the
26 Company's interim operator. Mr. Greif also requested an additional hearing.

27 On January 4, 2008, Staff filed a copy of the Affidavit of Publication it received from the
28 DVWUC.

1 On January 7, 2008, Staff filed a Response to Request for Additional Hearings and Notice of
2 Filing Staff's Responses to Kevin Greif's Second Data Request.

3 On January 18, 2008, Mr. Greif filed a Data Request and Request for Admission of Facts
4 from the Arizona Corporation Commission.

5 On January 25, 2008, Staff filed a letter sent to Mr. Greif stating that Staff had previously
6 provided all the information sought by Mr. Greif's most recent discovery request.

7 On February 5, 2008, Mr. Greif filed a letter to the Commission requesting that Staff be
8 directed to answer the questions contained in Mr. Greif's January 18, 2008 filing.

9 On February 15, 2008, Staff filed a Response to Intervenor Kevin Greif's Letter Filed
10 February 1, 2008, objecting to Mr. Greif's requests.

11 On June 20, 2008, a letter was sent to the Administrative Law Judge by the District requesting
12 a current status and anticipated date for transfer of the DVWUC assets. The letter was docketed on
13 July 10, 2008.

14 FINDINGS OF FACT

15 1. As described in the Staff Report (Ex. S-1), Staff requested that a docket be opened on
16 April 13, 2007 to consider the transfer of DVWUC's assets to the District.

17 2. DVWUC has a certificated service area covering approximately a $\frac{3}{4}$ square mile area
18 between Prescott and Prescott Valley, along Highway 69, in Yavapai County. The Company
19 provides water service to approximately 630 customers.

20 3. DVWUC's system is a consecutive water system to the Prescott Valley Water District
21 ("PVWD"), and the DVWUC obtains all of its water from the PVWD. Water is transferred to the
22 DVWUC through a 4-inch master meter, with a 2-inch meter bypass line. The DVWUC system
23 consists of three storage tanks totaling 66,500 gallons, nine booster pumps, two pressure tanks, and a
24 distribution system with approximately 72,200 feet of water mains (*Id.*, at Ex. 2).

25 4. The DVWUC system has been plagued for many years with both operational and
26 ownership issues, which were recounted in the Company's last rate case Order, Decision No. 68389
27 (January 5, 2006). The Staff Report points out that the distribution system was not built to water
28 industry standards by the initial developer, Ned Warren, and most of the water mains are composed

1 of asbestos cement pipe and lack shutoff valves. As a result, when a leak occurs on the system, the
2 operator must drain the entire distribution system to repair the leak (*Id.*).

3 Historical Background of DVWUC

4 5. As described in Decision No. 68389¹, DVWUC is a non-profit corporation originally
5 formed in October 1994 by Mr. and Mrs. Guy Emminger and Mr. and Mrs. Robert Seleman to
6 operate Triangle Development Corporation's ("Triangle") water utility assets after Triangle filed a
7 voluntary Chapter 7 bankruptcy petition in U.S. Bankruptcy Court for the District of Arizona.

8 6. On November 1, 1994, the Bankruptcy Court entered a Stipulated Order of
9 Abandonment which removed Triangle's water utility assets from the bankruptcy estate, and thereby
10 allowed continued operation of the water system without oversight by the court (*Id.* at 14-16).

11 7. On December 30, 1994, counsel for Triangle sent a letter to Mr. Emminger
12 authorizing DVWUC to continue operating the water system on behalf of Triangle, as the system had
13 been operated previously by DVWUC on a *de facto* basis.

14 8. Following almost two years of negotiations, on September 11, 1996, Triangle and
15 DVWUC entered into an asset purchase agreement allowing DVWUC to acquire the utility assets.

16 9. In Decision No. 60125 (March 19, 1997), the Commission issued an Opinion and
17 Order which, among other things: (a) approved the purchase agreement between Triangle and
18 DVWUC and transfer of Triangle's CC&N to DVWUC; (b) approved a service agreement between
19 Shamrock Water Company ("Shamrock")² and DVWUC for provision of bulk water for resale
20 distribution to DVWUC's customers; and required DVWUC to file an application for rate review
21 within 15 months of the Order.

22 10. DVWUC filed an application for an emergency rate increase shortly after issuance of
23 Decision No. 60125, which application was denied by Decision No. 60394 (September 5, 1997).
24 DVWUC did not comply with the requirement to file a permanent rate application within 15 months
25 of Decision No. 60125.

26 ¹ We take administrative notice of Decision No. 68389 and the underlying record therein.

27 ² Shamrock was subsequently acquired by an improvement district, the PVWD, formed by the Prescott Valley Town
28 Council on September 24, 1998. The Commission granted Shamrock's application to cancel its CC&N in Decision No.
61296 (December 16, 1998) due to the district's formation. The PVWD continues to be the sole provider of water to
DVWUC under agreements executed between DVWUC and the PVWD.

1 11. In the intervening period since DVWUC was formed, the Company has had ongoing
2 problems complying with the service agreement with the PVWD. DVWUC failed to file required
3 monthly reports with the PVWD; DVWUC reported a significantly lower number of customers than
4 were actually connected to the system; and DVWUC failed to pay the \$1,200 connection charge for
5 new hook-ups³. As a result of these practices, DVWUC owed the PVWD more than \$123,000 as of
6 October, 2000 (*Id.* at 10).

7 12. Beginning in 1998, a number of DVWUC customers experienced various billing
8 problems such as: not being billed for service or being billed only sporadically; being billed multiple
9 times for service; being billed for excessive amounts during given periods; and making up-front
10 payments for meters and other services that were never received. As noted in Decision No. 63547,
11 by 1998, DVWUC had evolved into a one man operation from the time of incorporation in 1994, with
12 Mr. Emminger as the president and effectively the sole operator of the Company. Alleged computer
13 problems in 1998 and 1999 apparently exacerbated the ongoing billing problems reported by
14 customers (*Id.*).

15 13. In a consolidated proceeding that combined a number of individual complaints filed
16 against DVWUC, the Commission found that Mr. Emminger was not operating DVWUC in
17 accordance with prior Commission Decisions, Commission regulations, and State law. The
18 Commission therefore authorized Staff to take all necessary actions to engage a qualified
19 management entity to operate, manage, and maintain DVWUC (*Id.* at 10-12). Mr. Tim Kylo of
20 Bradshaw Management Corporation was subsequently appointed as the interim manager of DVWUC,
21 and acted in that capacity until his resignation as interim manager in September 2005. Mr. Don
22 Bohlier was appointed as interim manager following Mr. Kylo's resignation.

23 Proposed Transfer to District

24 14. As stated in the Staff Report, the District's request is the first to be considered by the
25 Commission under Arizona Revised Statutes ("A.R.S.") §10-11421, which provides, in relevant part,
26 that if a corporation that has been administratively dissolved:

27
28 ³ See, Decision No. 63547 (April 4, 2001), at 8.

1 ...is a utility providing domestic water services or domestic wastewater
2 services and the corporation has been dissolved for at least three years,
3 after notice to interested parties, opportunity for objection and hearing
4 before the commission, the assets of the corporation may be transferred by
5 the commission to a domestic water improvement district or domestic
6 wastewater improvement district established pursuant to title 48, chapter 6
7 or to a municipality incorporated pursuant to title 9, chapter 1, on receipt
8 by the commission of a written request from the governing body of the
9 district or municipality (footnotes omitted).

10 15. Staff points out that the Commission's Corporations Division issued a Certificate of
11 Dissolution to the Company on April 28, 2002, although the DVWUC has continued to provide water
12 service to customers under the operation of an interim manager appointed by the Commission since
13 2001 (*See*, Decision No. 68389, at 3).

14 16. At a special meeting on December 20, 2006, the Yavapai County Board of Supervisors
15 voted unanimously to establish the Diamond Valley Water District. According to Staff, the DVWUC
16 has been dissolved for more than three years, and the District was formed to accept the assets
17 pursuant to A.R.S. §10-11421 (Ex. S-1).

18 17. Staff indicates that the District began holding public meetings in February 2007, and
19 the Company's February and March 2007 bills contained inserts providing notice to customers of the
20 district's meeting schedule and location. Public notice of monthly meetings and agendas are posted
21 at the Prescott Library and on the Yavapai County website. In addition, in accordance with a
22 Procedural Order issued October 1, 2007, notice was provided to each customer via bill inserts and
23 publication was made in the *Courier*, a daily newspaper published in Prescott, Arizona.

24 18. According to the Staff Report, the District Board is comprised of five individuals with
25 a broad range of experience including engineering, accountancy, real estate and health care. The
26 Board members' terms are 2 years or 4 years to ensure continuity (*Id.* at 2).

27 19. Staff states that the Arizona Small Utilities Association ("ASUA") has volunteered
28 one of its certified operators to assist the District with its operations, on a temporary basis, until the
District retains a permanent management company to operate the system. The District also contacted
the Water Infrastructure Financing Authority ("WIFA") regarding a technical assistance grant of up
to \$35,000 for non-construction, design purposes (*Id.*).

1 20. The Staff Report indicates that the DVWUC is currently serving approximately 11
2 customers that are located outside the Company's certificated service area. The District represented
3 that it will continue to serve those customers after the transfer (*Id.*).

4 21. According to the Staff Engineering Report, an October 23, 2007 report by the Arizona
5 Department of Environmental Quality ("ADEQ") indicated there were no operation or maintenance
6 deficiencies, and the system was delivering water in compliance with applicable water quality
7 standards (Ex. S-1, Eng. Report at 2). However, according to a field inspection report issued by
8 ADEQ on May 11, 2007, a number of system corrective actions should be undertaken by the
9 Company "before the item fails and creates a situation that results in non-compliance of the system."
10 (*Id.*, at Attach. 1)⁴.

11 22. The DVWUC is located in the Prescott Active Management Area ("AMA"), but since
12 the Company uses less than 250 acre-feet of water per year, it is considered by the Arizona
13 Department of Water Resources ("ADWR") to be a small provider and is therefore not subject to the
14 gallons per capita per day limit and conservation rules. Under ADWR rules, the Company is only
15 required to monitor and report water use (*Id.* at 2).

16 23. Staff Engineering indicated that DVWUC's current source and storage capacity is
17 sufficient to serve its current customer base and reasonable growth. The Company is expected to
18 have approximately 700 customers by 2009, and has a current source capacity of 1,600 gallons per
19 minute ("gpm") and storage capacity of 185,000 gallons (Decision No. 68389, at 9).

20 24. At the time of the last rate case, Staff indicated that the PVWD's water arsenic
21 concentrations range from 3 parts per billion ("ppb") to 3.7 ppb and thus are in compliance with the
22 United States Environmental Protection Agency's new arsenic maximum contaminant level of 10
23 ppb, which became effective January 23, 2006 (*Id.*).

24 25. In the Company's last rate case, Staff expressed concern with DVWUC's water loss
25 rate of 22.3 percent during the test year. Staff generally recommends that non-account water should
26 be no higher than 10 percent. As indicated above, the Company's distribution system was not built to

27 ⁴ The corrective actions identified by ADEQ include repairs or equipment modifications to the Ramada Storage Tank site;
28 the Lisa Lane Tank site; the Emerald Pump site; the Rosequartz Pump site; and the Opal Tank site.

1 water industry standards by the initial developer, Ned Warren, and most of the Company's water
2 mains are asbestos cement pipe and are lacking shut-off gate valves (*Id.*).

3 26. In its December 19, 2007 filing, Staff prepared an evaluation of the DVWUC's assets
4 and liabilities, based on the information available to Staff through actual physical records and
5 electronic data recorded on the computer used by the interim operator, Don Bohlier. Staff indicated
6 that it did not find any unrecorded assets or liabilities that were not previously reported in the 2006
7 financial audit of the Company prepared by Darlene Wood (December 19, 2007 Staff Report, at 1).

8 27. Staff stated that it received clarification regarding several issues raised by the District
9 at the hearing. First, with respect to ownership of the computer and software used by Mr. Bohlier,
10 Staff claims that Mr. Bohlier initially purchased the computer and software with funds provided by
11 his management company in December 2006 and January 2007. However, his management company
12 was subsequently reimbursed by the DVWUC for the computer and software in February 2007.
13 According to Staff, Mr. Bohlier's company paid the DVWUC back for the computer and software in
14 November 2007, because he believed only he could be licensed to use the software associated with
15 the computer and the software would not be transferable to the District. Staff indicated that it
16 contacted the software manufacturer, RVS, and was told the District could be licensed to use the
17 software if Mr. Bohlier relinquished his licensure (*Id.* at 2).

18 28. The second item concerns the status of a truck that was apparently recorded on the
19 Company's books and was included in rate base in the last rate case. Staff stated that Mr. Bohlier
20 never received a Company truck when he became the interim operator, and Staff was unable to
21 determine when the truck was removed from the DVWUC's assets, and by whom (*Id.*).

22 29. The third matter for which there was some uncertainty at the hearing relates to the
23 customer deposits account maintained by the Company. Staff contends that there is a possibility that
24 the customer deposit amount recorded by Mr. Bohlier might not be accurate. According to Staff, Mr.
25 Bohlier claims that he has recorded all deposits received during his tenure as interim manager, but he
26 could not be certain that all customer deposits received prior to that time were accurately recorded
27 (*Id.*).

28 30. With respect to the Company's infrastructure assets, Staff prepared an "asset listing"

1 of the plant-in-service at original cost ("OC"), based on prior rate case Staff Reports and Company
2 Annual Reports. Staff conducted a field inspection on December 4, 2007 to verify the plant-in-
3 service. In order to ascertain the reconstruction cost new ("RCN"), Staff used the Handy-Whitman
4 Indexes for Cost Trending applied to the OC valuations. Standard water plant depreciation values
5 were used by Staff to depreciate the assets (*Id.*, Engineering Analysis, at 1).

6 31. Staff stated that it verified which plant asset items were considered used and useful
7 during its field inspection, and attached an exhibit showing all plant assets. Staff's exhibit shows the
8 plant items that would be transferred to the District, including the assets Staff considers not to be
9 used and useful from a ratemaking perspective (the non-used and useful assets are separately
10 identified) (*Id.*).

11 32. Based on its evaluation, Staff determined that the DVWUC system has a depreciated
12 original cost of \$271,511 and a reconstruction cost new, less depreciation, of \$491,901 (*Id.*).

13 33. According to Staff, the circumstances presented by this case fulfill the purpose and
14 requirements of A.R.S. §10-11421. Staff therefore recommends approval of the transfer of the assets
15 of the DVWUC to the District, and cancellation of the Company's CC&N.

16 Discussion and Resolution

17 34. There is no dispute in the record that, although DVWUC has operated as the *de facto*
18 provider of water utility service in the Diamond Valley area for a number of years, the Company's
19 corporate status was revoked by the Commission's Corporations Division in 2002. It is also clear
20 that the duly elected members of the Board of the Diamond Valley Water District unanimously
21 requested, in writing, that the assets of the DVWUC be transferred to the District and that upon
22 transfer of the Company's assets, the District would assume legal and operational responsibility for
23 the provision of water utility service to current DVWUC customers. Finally, the record indicates that
24 notice was properly given to all of the current DVWUC customers, through both bill inserts and
25 newspaper publication, and ample opportunity to be heard was allowed through public comment and
26 intervention, as well as a public evidentiary hearing on the merits of the District's request. We
27 believe that the requirements set forth in A.R.S. §10-11421 have therefore been satisfied.

28 35. Although we understand that the sole intervenor in this proceeding, Mr. Greif, raised

1 certain issues related to the transfer, we do not believe the issues raised by Mr. Greif should negate
2 the unanimous desire by the District's Board for the asset transfer to be approved. During his
3 testimony at the hearing, Mr. Greif primarily expressed concerns regarding the specific assets that
4 would be transferred to the District, potential future liability of the District, and continuation of
5 service by the District to customers located outside the DVWUC CC&N area, but that are currently
6 served by the Company. Despite his ongoing concerns, Mr. Greif testified that "...the only way to
7 get this resolved is ultimately to get it, you know, the utility to the District. So if these things aren't
8 resolved, then the solution is still the District....[and] the bottom line is, in any state the community
9 will be better served by the District than it has been by the current operation or the current
10 regulation..." (Tr. 92). In his concluding remarks, Mr. Greif reiterated his position, stating, "I
11 appreciate the way this hearing has been held today, and I think this thing is moving in the right
12 direction and I want to thank a lot of people that worked hard to do that." (Tr. 188).

13 36. With respect to continuation of service to customers outside the current CC&N, Staff
14 witness Linda Jaress testified that she had been assured by the Yavapai County liaison for the District
15 that the District "can serve wherever they want to serve" (Tr. 169-171). In response to the concerns
16 raised regarding the specific assets and liabilities that would be transferred, Staff was directed at the
17 hearing to undertake a further investigation and provide a report, based on existing records, of the
18 assets and liabilities that currently exist for the DVWUC and that would be transferred to the District
19 upon approval by the Commission (Tr. 147).

20 37. As discussed above, Staff interviewed the interim operator, Mr. Bohler, and reviewed
21 the available records, prior to filing its supplemental report on December 19, 2007. Staff's
22 supplemental report provided an evaluation of the DVWUC assets and liabilities, discussed a
23 resolution of the issues related to the computer and software, whether a company truck existed, and
24 customer deposits. Staff also provided a list of all the assets that Staff believed would be transferred
25 to the District, provided a valuation of the Company's plant-in-service, and calculated both an
26 original cost and reconstruction cost of the plant⁵.

27 _____
28 ⁵ The nomenclature used by Staff for valuing plant for regulatory purposes is not binding on the District in setting rates
once the assets are transferred.

1 38. We commend the members of the Board for undertaking the difficult task of forming
2 the District and following through to assume control of a water utility that has been plagued by a
3 number of difficulties for many years. The Board's commitment was exemplified through testimony
4 provided at the hearing by four of the five Board members⁶. The Board members indicated that,
5 despite gaps in the information available regarding the existing assets and liabilities of the DVWUC,
6 they remained supportive of the acquisition (Tr. 56-58; 62-63; 70). Through the provision of
7 additional information by Staff, we believe that the District has the best available data regarding the
8 assets that currently exist in the DVWUC system. However, given the obvious gaps in record
9 keeping that occurred prior to the Commission's appointment of an interim manager, there is no way
10 to ensure that any list is completely accurate. In a letter filed on July 10, 2008, and signed by all five
11 of the current members, the Board reiterated its support for the transfer of the assets and control of
12 the utility company.

13 39. This case presents the first opportunity for the Commission to interpret and apply a
14 statute (A.R.S. §10-11421) that was created to allow the Commission to approve the transfer of the
15 assets of a troubled water company to a district or municipality, if certain specific criteria exist. The
16 language of the statute states that a water utility company whose corporate status has been dissolved
17 for at least three years may have its assets transferred by the Commission to a domestic water
18 improvement district, upon written request by the district, and following notice and a hearing. The
19 Diamond Valley Water Users Corporation and the Diamond Valley Water District clearly meet the
20 transferor and transferee requirements, respectively, under A.R.S. §10-11421. We therefore find that
21 transfer of the assets of the DVWUC to the District is in the public interest and should be approved.

CONCLUSIONS OF LAW

22
23 1. DVWUC is a public service corporation within the meaning of Article XV of the
24 Arizona Constitution and A.R.S. §§40-281, 40-282 and 40-285.

25 2. The Commission has jurisdiction over DVWUC and the subject matter of the
26 application.

27 ⁶ The members of the Board who testified in support of the application were Jim Morgan, Chairman; Dean Briggs,
28 Treasurer; Dan Chapman, Vice-President; and Susan Echenrode, Clerk and Secretary. The fifth member was unable to attend due to illness.

3. The District's request satisfies the requirements set forth in A.R.S. §10-11421.

4. Notice of the request was provided as required by law.

5. There is a continuing need for water utility service in DVWUC's certificated area.

6. The District is a fit and proper entity that is ready, willing and able to assume the responsibility of providing water utility service within DVWUC's presently certificated area.

7. The transfer of DVWUC's assets to the District, and cancellation of DVWUC's CC&N, is in the public interest.

8. Staff's recommendation is reasonable and should be adopted.

ORDER

IT IS THEREFORE ORDERED that the transfer of assets of the Diamond Valley Water Users Corporation to the Diamond Valley Water District, pursuant to A.R.S. §10-11421, is hereby approved.

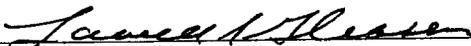
IT IS FURTHER ORDERED that the cancellation of Diamond Valley Water Users Corporation's Certificate of Convenience and Necessity is hereby approved effective upon the closing of the transfer of assets to the Diamond Valley Water District.

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1 IT IS FURTHER ORDERED that Diamond Valley Water Users Corporation shall notify the
2 Commission by a filing in this docket within fifteen days of the closing of the transfer of assets to the
3 Diamond Valley Water District.

4 IT IS FURTHER ORDERED that this Decision shall become effective immediately.

5 BY ORDER OF THE ARIZONA CORPORATION COMMISSION.
6

7 
8 CHAIRMAN COMMISSIONER

9  COMMISSIONER
10  COMMISSIONER
 COMMISSIONER

11
12 IN WITNESS WHEREOF, I, BRIAN C. McNEIL, Executive
13 Director of the Arizona Corporation Commission, have
14 hereunto set my hand and caused the official seal of the
15 Commission to be affixed at the Capitol, in the City of Phoenix,
16 this 3rd day of Sept., 2008.

17 
18 BRIAN C. McNEIL
19 EXECUTIVE DIRECTOR

20 DISSENT _____

21 DISSENT _____
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27
28

1 SERVICE LIST FOR: DIAMOND VALLEY WATER USERS
CORPORATON

2
3 DOCKET NO.: W-03263A-07-0244

4 DIAMOND VALLEY WATER DISTRICT
5 1848 Emerald Drive
6 Prescott, AZ 86301

7 Don Bohler, Interim Operator
8 DIAMOND VALLEY WATER USERS CORPORATION
9 P.O. Box 13070
10 Prescott, AZ 86304-3070

11 Kevin Greif
12 1140 N. Opal Dr.
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