

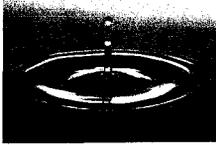
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# Ehrenberg Improvement Association

## WATER DEPARTMENT



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P.O. Box 50 - Ehrenberg, AZ. 85334

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October 26, 2009

Arizona Corporation Commission  
Docket Control  
1200 W. Washington St.  
Phoenix, AZ 85007

Arizona Corporation Commission  
**DOCKETED**

OCT 28 2009

DOCKETED BY	<i>MM</i>
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Ref: Ehrenberg Improvement Association  
Docket # W-02273A-08-0251

Dear Sir or Madam:

As ordered by the Hearing Officer at the hearing concerning Ehrenberg Improvement Association's application for a permanent rate increase, enclosed are thirteen (13) copies of a letter from the Arizona Department of Water Resources attesting to the fact that EIA's revised system water plan meets the objectives set forth in *Arizona Revised Statutes* § 45-342. This is a late filing of exhibit A-2.

Should you have any questions or if I may be of service, please do not hesitate to contact me at (928) 923-9388.

Sincerely,

Dennis Price  
Manager  
Ehrenberg Improvement Association

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AZ CORP COMMISSION  
DOCKET CONTROL

JANICE K. BREWER  
Governor



HERBERT R. GUENTHER  
Director

## ARIZONA DEPARTMENT OF WATER RESOURCES

3550 North Central Avenue, Second Floor  
PHOENIX, ARIZONA 85012-2105

(602) 771-8500

July 2, 2009

EHRENBERG IMPROVEMENT ASSN  
P O BOX 50  
EHRENBERG, AZ 85334

System name      EHRENBERG IMPROVEMENT ASSN

ADWR CWS ID:    91-000755.0000  
                          (AZ0415497)

Re:      System water plan review

Dear Water Provider:

The Arizona Department of Water Resources (ADWR) has completed its review of your revised system water plan and has determined that your plan meets the objectives set forth in *Arizona Revised Statutes* § 45-342.

Please note that ADWR bases its compliance determination on the basic outline of system water plan requirements provided in statute. It is the water provider's responsibility to make sure the plan is realistic, practical, and technically sound for the water system and the community. The goal of the system water plan should be to reduce drought vulnerability through a strong water supply plan and conservation component, as well as ensure that the system is prepared to respond to a drought emergency.

System water plans should be implemented and evaluated prior to the next submittal so that appropriate revisions and improvements can be made. Updates are due to ADWR every five years. **To assist you with future submittals, we have included a list of important points to consider on the back of this page.** Note that these guidelines and recommendations are not specific to your plan, but are general recommendations based on components that were commonly not given sufficient consideration. For further assistance, you can also view several plans chosen as good "models" to consider at [www.azwater.gov/dwr/drought/cws.html](http://www.azwater.gov/dwr/drought/cws.html), as well as a fact sheet on conservation and drought planning.

Your system water plan update will be due to ADWR by January 2, 2012. (Note that if you choose to make changes to your plan before this time, your plan must be submitted within 60 days of the time the revisions are made.) If you have any specific questions about your system water plan or ADWR's review, please contact the Drought Program at (602) 771-8442 or by e-mail at [ecws@azwater.gov](mailto:ecws@azwater.gov).

Sincerely,

A handwritten signature in cursive script that reads "Susan Craig".

Susan Craig, Manager  
ADWR Community Water Planning

cc:      Emily Wunder, ADWR Conservation Program

## **Guidelines and Recommendations for Improvement**

### **Water Supply Plan**

*Demand analysis* (A.R.S. 45-342(H)(5)) - The statute requires “an analysis of present and future water supply demands for the next five, ten and twenty years.” A brief discussion of how the numbers were determined (an analysis) should be included, not just the volume of demand predicted. A discussion of how the system will meet the anticipated demand should also be included, including potential new sources of supply if determined to be necessary.

### **Drought Preparedness Plan**

*Drought stage determination* (A.R.S. 45-342(I)(2)) - Systems should include in their plan an explanation of how they will determine when a drought stage has been triggered, as well as how they will determine when that stage can be ended. ADWR realizes that the process for deciding when and how stages are triggered will involve a potentially complex set of variables. However, the plan should at least include what variables will be considered and how, a process for how the decision will be made, and who will have authority to make it. Systems should also consider how they will enforce any water restrictions that are proposed for each drought stage, if the provider has legal authority to do so.

*Public notification of a water supply shortage and implementation of the drought plan* (A.R.S. 45-342(I)(3)(a)) - It is important that the process of public notification is considered carefully. For example, notice in monthly water bills may be sufficient during normal conditions or earlier drought stages, but may not be timely enough during later stages when immediate water use reductions are needed.

*Development of emergency sources* (A.R.S. 45-342(I)(3)(b)) - Whereas the water supply plan requires a list and description of emergency sources, the drought preparedness plan requires a plan of action for “development” of those supplies. Specific arrangements should be worked out and documented prior to an emergency situation.

*Management measures* (A.R.S. 45-342(I)(3)(c)) - Water management measures proposed for each drought stage should be as specific as possible, recognizing that changes can be made as warranted. For example, if a percentage reduction in water use is proposed, the plan should list ways it can be achieved.

### **Water Conservation Plan**

ADWR provided several examples of basic conservation programs that could be checked off on the system water plan form. However, a description of the program and how it will be implemented should also be provided.

ADWR recognizes that many communities are looking for guidance in developing a conservation plan. ADWR’s Conservation Program was created to address this need and is available to provide education and assistance. If you would like suggestions or assistance with beginning or improving your water conservation programs, please contact Marjie Risk, Water Conservation Supervisor, at (602) 771-8422 or [mlrisk@azwater.gov](mailto:mlrisk@azwater.gov), or Paul Charman, Senior Water Conservation Planner, at (602) 771-8423 or [pwcharman@azwater.gov](mailto:pwcharman@azwater.gov).

