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BEFORE THE ARIZONA CORPORATION COMMISSION

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2010 MAY -4 A 11:42

Arizona Corporation Commission

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AZ CORP COMMISSION
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MAY - 4 2010

DOCKETED BY

APPLICATION OF BIG PARK WATER COMPANY, INC., AN ARIZONA CORPORATION, FOR AUTHORITY TO INCUR LONG-TERM DEBT FROM THE WATER INFRASTRUCTURE FINANCE AUTHORITY OF ARIZONA

DOCKET NO. W-01624A-10-0009

COMMENTS ON STAFF REPORT

1 Big Park Water Company, Inc., ("Big Park") hereby files the following brief comments
2 on the Commission Staff Report filed in this docket on April 30, 2010.

3 **Comment 1 – Thank You.** Big Park understands that Staff is laboring under severe
4 resource constraints, so it must first thank Staff for its timely and thorough review of Big Park's
5 application.

6 **Comment 2 – Big Park is a Class B Water Company.** In the Executive Summary, the
7 Staff Report states that Big Park is a "Class A Public Service Company." In fact, Big Park is a
8 "Class B" company. Big Park recently filed its Annual Report for the calendar year ending
9 December 31, 2009. The report shows that Big Park's annual revenues for 2009 were
10 \$1,386,981, and revenues for \$1,403,207 were 2008. Therefore, per R14-2-103(A)(3)(q), Big
11 Park is classified as a "Class B" water company.

12 **Comment 3 – Big Park Needs Additional Time to File the Approval of Construction.**

13 The final recommendation in the Staff Report states: "Staff further recommends that the
14 Company be required to file the ADEQ Approval of Construction for the arsenic treatment
15 facilities, as a compliance item in this docket, by April 29, 2011." Big Park does not object to
16 being required to file the Approval of Construction ("AOC"). However, for the reason set forth

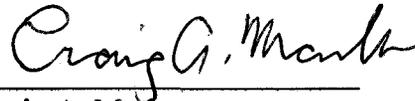
1 below, Big Park would likely be unable to meet an April 29, 2011, deadline. Big Park instead
2 requests that the deadline be June 30, 2011.

3 On April 26, 2010, Big Park copied Staff on an e-mail sent to ADEQ which contained the
4 following construction schedule for the arsenic-remediation facilities that will be funded by the
5 WIFA loan for which Big Park requests approval:

- 6 • March 22, 2010 Received Approval to Construct from ADEQ for EPDS001
- 7 • June 30, 2010 Receive approval for Long Term Financing from Arizona
8 Corporation Commission (Decisions are typically issued about one
9 week after Open Meeting)
- 10 • July 31, 2010 Submit to ADEQ an administratively complete application for an
11 Approval of Construction for EPDS005
- 12 • August 31, 2010 Receive Approval to Construct for EPDS005 treatment facility
13 from ADEQ
- 14 • Nov. 1, 2010 Receive funding from WIFA
- 15 • Nov. 1, 2010 Begin construction on EPDS001 and EPDS005
- 16 • April 30, 2011 Submit to ADEQ for Approval of Construction for EPDS001 and
17 EPDS005
- 18 • May 5, 2011 Big Park will collect an initial sample and then continue to conduct
19 quarterly monitoring for arsenic

20 As this schedule shows, Big Park only anticipates filing an application with ADEQ for approval
21 of the AOCs by April 30, 2011. It should then normally take a few weeks to actually obtain the
22 AOCs from ADEQ. Therefore, to accommodate the additional time needed to obtain the AOCs,
23 Big Park asks that the deadline for filing the AOCs be June 30, 2011.

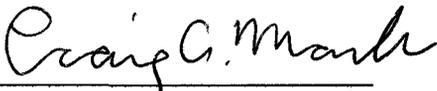
1 Respectfully submitted on May 4, 2010 by:

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4
5 Craig A. Marks
6 Craig A. Marks, PLC
7 10645 N. Tatum Blvd
8 Suite 200-676
9 Phoenix, Arizona 85028
10 (480) 367-1956
11 Craig.Marks@azbar.org
12 Attorney for Big Park Water Company

13
14 **Original and 13 copies filed**
15 on May 4, 2010, with:

16
17 Docket Control
18 Arizona Corporation Commission
19 1200 West Washington
20 Phoenix, Arizona 85007

21
22 By: 
23 Craig A. Marks
24 Craig A. Marks