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ARIZONA CORPORATION COMMISSION
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Arizona Corporation Commission
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OCT 8 2010

DOCKETED BY

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Attorneys for Adaman Mutual Water Company

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION OF
ADAMAN MUTUAL WATER COMPANY FOR
APPROVAL TO ISSUE STOCK

Docket No. W-01997A-09-0297

**ADDITIONAL INFORMATION
RELATING TO PUBLIC
COMMENT**

Adaman Mutual Water Company ("Adaman") hereby offers the following information to the Commissioners regarding a public comment letter submitted by Liberty Water on behalf of Litchfield Park Service Company (both entities referred to herein as "LPSCo") docketed on September 24, 2010.

In its September 23, 2010, public comment letter, LPSCo states a variety of objections (some are quite inflammatory) to Adaman's bulk water sale arrangements with the City of Goodyear. LPSCo explains in the last paragraph of its letter that, although LPSCo understands the issues it raises do not directly impact Adaman's request to issue stock, it still urges the Commission to consider the allegations in making a decision (implying or requesting in different parts of the letter that the Commission should either delay or reject Adaman's request to issue stock).

Although LPSCo's letter is not evidence that can be considered in this matter, Adaman felt it important due to the timing and nature of LPSCo's request to respond. First, there is no justifiable reason for the timing of LPSCo's last-minute attempt to interfere with Adaman's

1 application in this matter. As LPSCo states in its letter, LPSCo has been aware of the bulk
2 water sale arrangement since at least the fall of 2008. LPSCo did not, however, seek to
3 intervene. LPSCo also understood the Goodyear bulk water sale potential as early as 2006. As
4 was explained at the Hearing in this matter, LPSCo originally approached Adaman with a
5 proposal for LPSCo to purchase Adaman to enable LPSCo to withdraw water from Adaman's
6 service area to sell to the City of Goodyear, the same physical arrangement to which LPSCo
7 now objects. See August 17, 2010 Transcript, pp. 44-45. LPSCo's staff and its attorneys
8 regularly appear in Commission matters, and, if LPSCo had any relevant evidence to offer
9 regarding Adaman's application, it could have done so according to the Commission's rules and
10 orders.

11 Second, despite LPSCo's anemic attempt to tie its allegations to a customer rate
12 argument, LPSCo's allegations relate to an approval process that is within the jurisdiction of the
13 Arizona Department of Water Resources ("ADWR"). LPSCo already submitted similar written
14 objections to ADWR on or about April 3, 2009, and it is not appropriate to raise them here.

15
16 RESPECTFULLY SUBMITTED this 8th day of October, 2010.

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18 RYLEY CARLOCK & APPLEWHITE

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20
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1 An original and thirteen copies of the
2 foregoing filed this 8th day of October, 2010
3 with:

4 Docket Control
5 Arizona Corporation Commission
6 1200 W. Washington St.
7 Phoenix, Arizona 85007

8 Copies of the foregoing hand delivered
9 this 8th day of October, 2010 to:

10 Steve Olea
11 Utilities
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25 Copy of the foregoing mailed
26 this 8th day of October, 2010 to:

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By 