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BEFORE THE ARIZONA CORPORATION COMMISSION

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8 IN THE MATTER OF THE APPLICATION OF
 9 CHAPARRAL CITY WATER COMPANY,
 10 INC. FOR A WAIVER UNDER A.A.C. R14-2-
 806 OR, IN THE ALTERNATIVE, NOTICE OF
 11 INTENT TO REORGANIZE UNDER A.A.C.
 R14-2-803.

Docket No. W-02113A-10-0309

**RUCO'S NOTICE OF FILING
DIRECT TESTIMONY**

The Residential Utility Consumer Office ("RUCO") hereby provides notice of filing the Direct Testimony of William A. Rigsby, CRRA in the above-referenced matter.

RESPECTFULLY SUBMITTED this 10th day of November, 2010.

Michelle L. Wood
Counsel

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2 of the foregoing filed this 10th day
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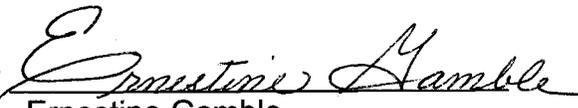
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CHAPARRAL CITY WATER COMPANY, INC.

DOCKET NO. W-02113A-10-0309

**DIRECT TESTIMONY
OF
WILLIAM A. RIGSBY, CRRA**

**ON BEHALF OF
THE
RESIDENTIAL UTILITY CONSUMER OFFICE**

NOVEMBER 10, 2010

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1 **INTRODUCTION**

2 Q. Please state your name, occupation, and business address.

3 A. My Name is William A. Rigsby. I am a Public Utilities Analyst V employed
4 by the Residential Utility Consumer Office ("RUCO") located at 1110 W.
5 Washington, Suite 220, Phoenix, Arizona 85007.

6

7 Q. Please describe your qualifications in the field of utilities regulation and
8 your educational background.

9 A. I have been involved with utilities regulation in Arizona since 1994. During
10 that period of time I have worked as a utilities rate analyst for both the
11 Arizona Corporation Commission ("ACC" or "Commission") and for RUCO.
12 I hold a Bachelor of Science degree in the field of finance from Arizona
13 State University and a Master of Business Administration degree, with an
14 emphasis in accounting, from the University of Phoenix. I have been
15 awarded the professional designation, Certified Rate of Return Analyst
16 ("CRRRA") by the Society of Utility and Regulatory Financial Analysts
17 ("SURFA"). The CRRRA designation is awarded based upon experience
18 and the successful completion of a written examination. Appendix I, which
19 is attached to my direct testimony further describes my educational
20 background and also includes a list of the rate cases and regulatory
21 matters that I have been involved with.

22

23

1 Q. What is the purpose of your testimony?

2 A. The purpose of my testimony is to present recommendations that are
3 based on my analysis of the proposed sale of all of the issued and
4 outstanding shares of common stock of Chaparral City Water Company
5 ("CCWC" or "Company") from American States Water Company
6 ("American States") to EPCOR (USA) Inc. ("EPCOR USA"). CCWC filed
7 an application for a waiver under A.A.C. R14-2-806 or in the alternative,
8 notice of intent to reorganize under A.A.C. R14-2-803 ("Application" or
9 "Proposed Reorganization") with the Arizona Corporation Commission
10 ("ACC" or "Commission") on July 23, 2010.

11

12 Q. Have you filed testimony on CCWC and American States in prior cases
13 before the ACC?

14 A. Yes. I have filed testimony in a number of proceedings involving CCWC
15 both as an analyst with the ACC Staff and as an analyst with RUCO. As
16 an ACC Staff member, I recommended that the Commission approve the
17 sale of CCWC from MCO Properties, Inc. to the Company's current owner,
18 American States.¹ As an analyst for RUCO, I have testified in every
19 CCWC rate case that has been decided on by the ACC since the
20 Commission approved the sale of CCWC to American States in
21 September 2000.² I was also involved in CCWC's appeal of Decision No.

¹ Docket No. W-02113A-00-0233,

² Docket No.'s W-02113A-04-0616 and W-02113A-07-0551

1 68176, which resulted in Decision No. 70441, dated July 28, 2008. In
2 April of 2010, I filed direct testimony and testified in a rehearing of
3 Decision No. 71308, which established CCWC's present rates.

4
5 Q. Have you filed testimony on EPCOR USA in prior cases before the ACC?

6 A. No. This is the first time that I have filed testimony on EPCOR USA.
7

8 Q. Please describe your analysis of the Proposed Reorganization requested
9 by CCWC.

10 A. My analysis relies on information contained in the Company's Application
11 and on information that was obtained from responses to data requests
12 issued by ACC Staff and RUCO. I studied information obtained over the
13 course of discovery in order to ascertain whether or not the Proposed
14 Reorganization is in the public interest and meets the requirements for
15 reorganization pursuant to A.A.C. R14-2-803(C).

16
17 Q. What is CCWC seeking in its Application?

18 A. According to CCWC's Application, the Company is seeking a waiver from
19 the Commission's Public Utility Holding Companies and Affiliated Interest
20 rules as set forth in A.A.C. R14-2-806. Should the Commission deny the
21 waiver being sought by the Company, CCWC gives notice to the
22 Commission of its intent to reorganize pursuant to A.A.C. R14-2-803 by
23 virtue of American States selling all of the outstanding and issued shares
24 of CCWC's common stock to EPCOR USA.

1 Q. What is the standard that you relied on in determining whether or not the
2 ACC should approve CCWC's request to reorganize under A.A.C. R14-2-
3 803?

4 A. The standard that I relied on is found in A.A.C. R14-2-803(C) which states
5 the following:

6 At the conclusion of any hearing on the organization or reorganization of
7 a utility holding company, the Commission may reject the proposal if it
8 determines that it would impair the financial status of the public utility,
9 otherwise prevent it from attracting capital at fair and reasonable terms,
10 or impair the ability of the public utility to provide safe, reasonable and
11 adequate service.
12

13 Q. Briefly summarize the recommendations that you are making in your
14 testimony.

15 A. Based on the results of my analysis, I am recommending that the ACC
16 approve CCWC's request on two conditions. The first condition is that no
17 acquisition costs related to the transfer of ownership between American
18 States and EPCOR (USA) be passed on to Arizona ratepayers. The
19 second condition is that no acquisition premium (i.e. the difference
20 between EPCOR USA's purchase price of CCWC's outstanding and
21 issued shares of common stock and the book value of CCWC at the time
22 the transaction is finalized) be recovered by EPCOR USA in any future
23 rate case decisions.

24
25 My recommendation is based on my belief that EPCOR USA is a fit and
26 proper entity whose ownership of CCWC will not impair the financial status
27 of the Company, or prevent CCWC from attracting capital at fair and

1 reasonable terms, or impair the ability of CCWC to provide safe,
2 reasonable and adequate service. For the reasons stated above, I am
3 recommending that the Commission approve CCWC's requested
4 reorganization subject to the two conditions that I described above and will
5 address later in my testimony.

6

7 **BACKGROUND**

8 Q. Please provide a brief description of CCWC.

9 A. According to the Company's Application, CCWC is a public service
10 corporation that provides water utility service to approximately 13,000
11 customers in a Commission-approved certificated area which includes the
12 Town of Fountain Hills and portions of eastern Maricopa County. CCWC's
13 current rates and charges were authorized in Decision No. 71308, dated
14 Oct. 21, 2009 as amended nunc pro tunc by Decision No. 71724, dated
15 December 8, 2009.

16

17 Q. Does CCWC have any pending matters before the ACC?

18 A. Yes. However, the Company states that none of the CCWC matters
19 pending before the Commission, or otherwise involving the Commission,
20 would be affected by the Proposed Reorganization.

21

22 ...

23

1 Q. Please describe the CCWC matters that are presently before the
2 Commission.

3 A. Presently there are three matters pending before the ACC.

4 The first matter involves a rehearing of two specific issues that were
5 addressed in CCWC's most recent rate case proceeding³. The first issue
6 on rehearing involves the treatment of proceeds obtained from a
7 settlement agreement that was reached between CCWC and the Fountain
8 Hills Sanitary District. The second issue on rehearing deals with the
9 recovery of costs associated with the appeal and remand of Decision No.
10 68176, dated September 30, 2005. The rehearing was concluded on April
11 12, 2010. No Recommended Opinion and Order has been issued to date.

12

13 A second matter pending before the ACC involves a Commission order to
14 leave the docket open on Decision No. 71308 until ACC Staff completes
15 its review of a California Public Utilities Commission investigation of
16 Golden State Water. Golden State Water is a subsidiary of American
17 States, which, as noted earlier, is the current owner of CCWC. The
18 Company states, and RUCO agrees, that if the Proposed Reorganization
19 is approved by the Commission, the matter involving Golden State Water
20 will be moot.

21

22

³ Docket No. W-02113A-07-0551, Rehearing of Dec. No. 71308.

1 The third matter involves CCWC's request for an extension of time to
2 comply with a number of conditions originally set forth in Decision No.
3 68238, dated October 25, 2005, which granted an Order Preliminary for a
4 CC&N extension that would allow the Company to include an additional
5 1,300 acres of state trust land in CCWC's certificated area.⁴ The
6 Commission later issued Decision No. 70608, which amended Decision
7 No. 68238 and extended the amount of time for CCWC to meet the
8 aforementioned compliance by eighteen months. Under Decision No.
9 70608, if the compliance conditions were not met by April 25, 2010, the
10 Order Preliminary would be deemed null and void. On June 3, 2010,
11 CCWC filed a request for an additional extension of the April 25, 2010
12 deadline established in Decision No. 70608. On June 4, 2010, ACC Staff
13 issued a memorandum which concluded that the Order Preliminary was
14 null and void, but that during a Commission Staff Open Meeting, held on
15 May 13, 2010, the Commission directed the Hearing Division to prepare a
16 Recommended Opinion and Order on the issue. The Commission
17 subsequently issued Decision No. 71824, dated August 10, 2010, which
18 reinstated the Order Preliminary granted in Decision No. 68238, as
19 amended by Decision No. 70608, and granted CCWC an extension until
20 February 1, 2011 to comply with the requirements of those prior
21 Decisions.

⁴ Docket No. W-02113A-05-0178

1 Q. What is the status of any Company appeals of ACC Decisions?

2 A. Since the Company filed its Application with the Commission, the Arizona
3 Court of Appeals has granted CCWC's motions to voluntarily dismiss
4 pending appeals of Commission Decision No.'s 70441 and 71308.

5

6 Q. Is the Company in compliance with state and federal drinking water
7 standards and current on its property taxes?

8 A. The Company stated in its Application that it is currently in compliance
9 with state and federal drinking water standards and received a public
10 water system compliance report from the Maricopa County Environmental
11 Services Department ("MCESD") that described CCWC's general public
12 water system as "compliant." The Company also stated that it was current
13 on CCWC's property tax payments. The Company also stated that
14 CCWC's Annual Water Withdrawal and Use Report for calendar year 2009
15 and its Central Arizona Groundwater Replenishment District 2009 report
16 were filed on March 15, 2010.

17

18 Q. Please provide a brief description of CCWC's parent company, American
19 States.

20 A. American States is a California corporation based in San Dimas,
21 California, which is publicly traded on the New York Stock Exchange
22 ("NYSE"). As noted above, in addition to CCWC, American States is also
23 the parent of Golden State Water Company, which provides water service

1 to over 250,000 customers in 75 communities throughout California, and
2 distributes electricity to approximately 23,000 customers in the Big Bear
3 recreational area in California.

4

5 American States also owns American States Utility Services, an
6 unregulated subsidiary which contracts with municipalities, the U. S.
7 government, and other private entities. American States Utility Services
8 provides various services, including billing and meter reading, water
9 marketing as well as the operation and maintenance of water and
10 wastewater systems at a number of military installations throughout the
11 United States.

12

13 Q. Please describe EPCOR USA.

14 A. EPCOR USA is presently a shell corporation that is an indirect, wholly
15 owned subsidiary of EPCOR Utilities Inc. ("EPCOR"). According to the
16 Company's Application, EPCOR is a municipally owned Canadian
17 corporation and holding company that builds, owns and operates water
18 and wastewater treatment facilities. EPCOR also builds, owns and
19 operates infrastructure and electrical transmission and distribution
20 networks in Canada. EPCOR is headquartered in Edmonton, Alberta, and
21 is governed by an independent board of directors. Its sole shareholder is
22 the City of Edmonton, Alberta, Canada.

23

1 According to CCWC's Application, EPCOR's primary operating
2 subsidiaries are EPCOR Water Services Inc. ("EPCOR Water"), EPCOR
3 Distribution & Transmission Inc. ("EPCOR Distribution") and EPCOR
4 Energy Alberta Inc. ("EPCOR Energy"). In July of 2009, EPCOR sold
5 substantially all of its power generation assets and related operations to
6 Capital Power, which was described as "a newly created power generation
7 entity." The Application states that, depending on market conditions,
8 EPCOR has plans to eventually sell all or a substantial portion of its
9 ownership interest in Capital Power and use the proceeds to finance
10 needed capital improvement projects in EPCOR's various utility
11 infrastructure businesses that provide water, wastewater treatment, power
12 transmission and power distribution services.

13
14 CCWC's Application states that EPCOR has extensive technical
15 experience in the operation and maintenance of water and wastewater
16 facilities that provide service to over one million people in more than 70
17 communities and counties located in Western Canada. The Company
18 also stated in its Application that EPCOR's holdings include systems that
19 have operating characteristics that are similar to CCWC's.⁵ According to
20 the Company's application, EPCOR intends to continue to use Central

⁵ On pages 4 and 5 of CCWC's Application, the Company states that "Just like CCWC, the service areas for the cities of Edmonton and Canmore, Alberta both have distribution systems with multiple pressure zones" and that "EPCOR Water's experience operating multiple zone distribution systems will benefit the customers of CCWC."

1 Arizona Project ("CAP") water as the primary source of water for CCWC's
2 customers in order to conserve Arizona's groundwater resources.
3

4 **PROPOSED REORGANIZATION**

5 Q. Why is American States selling CCWC to EPCOR USA?

6 A. According to the Company's Application, American States has decided to
7 divest itself of its ownership and stock interests in CCWC in order to focus
8 on its business activities in California and in states other than Arizona.
9

10 Q. Why is EPCOR USA buying CCWC?

11 A. According to CCWC's Application, EPCOR USA sees this transaction as
12 the beginning of an overall business strategy to invest in, and become a
13 long-term owner of water and wastewater utilities in Arizona and other
14 states. EPCOR USA's business strategy also includes the provision of
15 various utility-related services to municipalities and other governmental
16 entities located in Arizona and other states.
17

18 Q. Briefly describe the Proposed Reorganization.

19 A. CCWC's Application states that on June 7, 2010, EPCOR USA entered
20 into an agreement with American States to purchase all of the outstanding
21 shares of CCWC's common stock for \$29 million ("Stock Purchase
22 Agreement"). At the time of closing, EPCOR USA will pay, in cash, the
23 agreed upon sum to American States in exchange for CCWC's utility

1 plant, revenue and other assets which will not, as with CCWC's stock, be
2 used as security for the financing. At the close of the transaction, CCWC
3 will remain as the same legal entity that it was prior to the transaction,
4 except that it will now be a subsidiary of EPCOR USA as opposed to a
5 subsidiary of American States.

6
7 **ANALYSIS OF PROPOSED REORGANIZATION**

8 Q. Has RUCO had the opportunity to study the Proposed Reorganization of
9 CCWC?

10 A. Yes.

11
12 Q. Does RUCO believe that the Proposed Reorganization is in the public
13 interest?

14 A. Yes.

15
16 Q. Why does RUCO believe that the Proposed Reorganization is in the public
17 interest?

18 A. RUCO believes that the Proposed Reorganization meets the standard
19 found in A.A.C. R14-2-803(C). Based on RUCO's analysis, the Proposed
20 Reorganization will not impair the financial status of CCWC, nor will it
21 prevent the Company from attracting capital at fair and reasonable terms,
22 or impair the ability of CCWC to provide safe, reasonable and adequate
23 service.

1 Q. Why does RUCO believe that the Proposed Reorganization will not impair
2 the financial status of CCWC?

3 A. Under the Proposed Reorganization, CCWC will remain the same entity
4 that it currently is. As explained earlier, none of the Company's shares of
5 stock, utility plant, current or future revenue streams or other assets will be
6 encumbered or pledged as security as a result of the transaction. CCWC
7 will continue to have the ability to earn a return on its existing assets and
8 use all of the Company's operating revenues and cash flows to cover its
9 operating expenses and existing debt obligations.

10

11 Q. Will the Proposed Reorganization prevent CCWC from attracting capital at
12 fair and reasonable terms?

13 A. No. Under the terms of the Stock Purchase Agreement, CCWC will not
14 assume any additional debt or other liabilities in connection with the
15 transaction. Consequently, CCWC's capital structure will not change as a
16 result of the transaction and the Company's ability to attract capital at fair
17 and reasonable terms will be no different than it was prior to the
18 transaction. The Company would still be owned by a larger entity that has
19 the ability to obtain needed capital through the debt and equity markets
20 and make cash infusions to finance infrastructure improvements. RUCO
21 believes that, for all practical purposes, the Proposed Reorganization is
22 essentially no different from the one previously approved by the

1 Commission in which the ownership of CCWC was transferred from MCO
2 Properties, Inc. to the Company's current owner, American States.⁶
3

4 Q. What is the current capital structure of EPCOR USA's ultimate parent
5 EPCOR?

6 A. According to EPCOR's consolidated balance sheet for the period ended
7 December 31, 2009, EPCOR's end-of-year capital structure for 2009 was
8 comprised of approximately 41 percent long-term debt and 59 percent
9 common equity. This reflected an increase in EPCOR's equity position
10 over the previous end-of-year capital structure of 53 percent long-term
11 debt and 47 percent common equity.
12

13 Q. Why does RUCO believe that the Proposed Reorganization will not impair
14 the ability of CCWC to provide safe, reasonable and adequate service?

15 A. As explained above, the absence of any financial harm to CCWC, as a
16 result of the Proposed Reorganization, will not hinder the Company's
17 ability to continue to operate as it has prior to the change of ownership
18 and to continue to meet required water quality standards. RUCO also
19 believes that EPCOR, which will become CCWC's ultimate parent under
20 the terms of the Stock Purchase Agreement, is a fit and proper entity that
21 has both the experience and expertise to operate a regulated water
22 provider such as CCWC.

⁶ Decision No. 62909, dated September 18, 2000.

1 Q. What information did RUCO rely on to determine that EPCOR is a fit and
2 proper entity that has both the experience and expertise to operate a
3 regulated water provider?

4 A. In addition to relying on information contained in the Company's
5 Application and responses to formal data requests, RUCO had the
6 opportunity to meet personally with a representative of EPCOR who
7 answered a number of questions posed by RUCO's staff. EPCOR later
8 provided RUCO with documents⁷ and answers to questions that EPCOR's
9 representative did not have complete responses for during the
10 aforementioned meeting at RUCO's offices.

11
12 Q. Does RUCO believe that EPCOR has the ability to provide safe,
13 reasonable and adequate service to CCWC's ratepayers?

14 A. Yes. According to the Company's Application, EPCOR's water and
15 wastewater operations presently meet or exceed stringent Canadian
16 federal, provincial, and municipal water quality requirements. CCWC
17 further stated in its Application that in 2008, EPCOR's Quality Assurance
18 Laboratory scored the highest among 68 labs across Canada and the
19 United States in tests administered by the U.S. Environmental Protection
20 Agency and that the majority of the labs were in major United States cities.
21 During the meeting noted above, a representative from EPCOR

⁷ EPCOR provided RUCO with the following reports: 2009 Edmonton Water and Wastewater Performance Report, 2009 Performance Based Rates Progress Report, 2009 Canmore Utility Performance Report, 2009 Town of Tabor Performance Highlights, 2009 Town of Chestermere Performance Highlights, 2010 Sooke Contract Performance Report, 2008 EPCOR French Creek Annual Performance Report, 2008 EPCOR White Rock Annual Performance Report.

1 satisfactorily addressed questions posed by RUCO staff members on
2 information in the Company's Application regarding two environmental
3 administrative penalties, both of which were determined to be minor
4 violations by authorities and did not involve legal proceedings. EPCOR
5 later provided RUCO with additional information on its experience related
6 to surface water treatment and arsenic removal. EPCOR also informed
7 RUCO that it had gone for five years with no Environmental Protection and
8 Enhancement Act ("EPEA") or Water Act prosecutions, enforcement
9 orders, environmental protection orders, administrative penalties or
10 warning letters in connection with its Edmonton facilities. EPCOR also
11 stated that it had no outstanding notices of investigations from Alberta
12 Environment under the aforementioned EPEA or Water Act.

13
14 In summary, after a review of all of the information obtained to date, both
15 formally and informally, RUCO has concluded that EPCOR is a fit and
16 proper entity that has both the experience and expertise to own and
17 operate a regulated water provider in Arizona. RUCO also believes that
18 EPCOR will insure that CCWC is staffed with qualified individuals that will
19 continue to provide safe, reasonable and adequate service to ratepayers.

20
21 For all of the reasons cited above, RUCO believes that the Proposed
22 Reorganization meets the standard set forth in A.A.C. R14-2-803(C).

23

1 **RECOMMENDATION**

2 Q. What is RUCO's recommendation regarding the Proposed
3 Reorganization?

4 A. RUCO recommends that the Commission approve the Proposed
5 Reorganization subject to two conditions that relate to the recovery of
6 possible acquisition costs or an acquisition adjustment or premium. First,
7 RUCO recommends that no costs resulting from the sale of CCWC from
8 American States to EPCOR USA be passed on to ratepayers in a future
9 rate case proceeding. Second, RUCO recommends that no acquisition
10 adjustment or premium related to the sale of CCWC from American States
11 to EPCOR USA be allowed recovery in a future rate case proceeding.

12
13 Q. Why is RUCO recommending that no costs resulting from the sale of
14 CCWC from American States to EPCOR USA be passed on to ratepayers
15 in a future rate case proceeding?

16 A. RUCO believes that ratepayers should not have to bear any acquisition
17 related costs that may be incurred in order to integrate CCWC into
18 EPCOR or EPCOR USA's system for accounting, billing or other business
19 related functions. RUCO believes that these types of costs should be
20 borne by the acquiring entity or its ultimate parent. RUCO recommended
21 the same condition in the Qwest/CenturyLink merger case that is now
22 pending before the Commission.

23

1 Q. Why is RUCO recommending that no acquisition adjustment or premium
2 related to the sale of CCWC from American States to EPCOR USA be
3 allowed recovery in a future rate case proceeding?

4 A. RUCO believes that ratepayers should not have to pay for the difference
5 between the price EPCOR pays for CCWC and the book value of the
6 Company at the time of the acquisition. RUCO's recommendation is
7 consistent with the Commission's past practice of not allowing acquisition
8 premiums in rate base.

9

10 Q. Do you believe that the Commission has the authority to approve the
11 Proposed Merger on a conditional basis?

12 A. Yes. While I am not a lawyer and I am not expressing a legal opinion, I
13 believe that the Commission has the constitutional authority to approve a
14 merger or acquisition on certain conditions in order to insure that
15 ratepayers are not harmed as a result of a transaction such as the
16 Proposed Reorganization being sought in this proceeding.

17

18 Q. Can you cite a case in which the Commission approved a request for a
19 merger or acquisition on a conditional basis?

20 A. Yes. The best example is Decision No. 62909, dated September 18,
21 2000, cited earlier in my testimony, in which the Commission approved the
22 sale of CCWC from MCO Properties, Inc. to American States on condition
23 that CCWC's customers be held harmless from any obligation to pay

1 judgments arising out of future lawsuits against California subsidiaries of
2 American States.

3

4 Q. Does your silence on any of the issues or positions addressed in the
5 Company's Application constitute acceptance?

6 A. No, it does not.

7

8 Q. Does this conclude your direct testimony on the Proposed Reorganization
9 of CCWC?

10 A. Yes, it does.

Qualifications of William A. Rigsby, CRRA

EDUCATION:

University of Phoenix
Master of Business Administration, Emphasis in Accounting, 1993

Arizona State University
College of Business
Bachelor of Science, Finance, 1990

Mesa Community College
Associate of Applied Science, Banking and Finance, 1986

Society of Utility and Regulatory Financial Analysts
38th Annual Financial Forum and CRRA Examination
Georgetown University Conference Center, Washington D.C.
Awarded the Certified Rate of Return Analyst designation
after successfully completing SURFA's CRRA examination.

Michigan State University
Institute of Public Utilities
N.A.R.U.C. Annual Regulatory Studies Program, 1997 &1999

Florida State University
Center for Professional Development & Public Service
N.A.R.U.C. Annual Western Utility Rate School, 1996

EXPERIENCE:

Public Utilities Analyst V
Residential Utility Consumer Office
Phoenix, Arizona
April 2001 – Present

Senior Rate Analyst
Accounting & Rates - Financial Analysis Unit
Arizona Corporation Commission, Utilities Division
Phoenix, Arizona
July 1999 – April 2001

Senior Rate Analyst
Residential Utility Consumer Office
Phoenix, Arizona
December 1997 – July 1999

Utilities Auditor II and III
Accounting & Rates – Revenue Requirements Analysis Unit
Arizona Corporation Commission, Utilities Division
Phoenix, Arizona
October 1994 – November 1997

Tax Examiner Technician I / Revenue Auditor II
Arizona Department of Revenue
Transaction Privilege / Corporate Income Tax Audit Units
Phoenix, Arizona
July 1991 – October 1994

RESUME OF RATE CASE AND REGULATORY PARTICIPATION

<u>Utility Company</u>	<u>Docket No.</u>	<u>Type of Proceeding</u>
ICR Water Users Association	U-2824-94-389	Original CC&N
Rincon Water Company	U-1723-95-122	Rate Increase
Ash Fork Development Association, Inc.	E-1004-95-124	Rate Increase
Parker Lakeview Estates Homeowners Association, Inc.	U-1853-95-328	Rate Increase
Mirabell Water Company, Inc.	U-2368-95-449	Rate Increase
Bonita Creek Land and Homeowner's Association	U-2195-95-494	Rate Increase
Pineview Land & Water Company	U-1676-96-161	Rate Increase
Pineview Land & Water Company	U-1676-96-352	Financing
Montezuma Estates Property Owners Association	U-2064-96-465	Rate Increase
Houghland Water Company	U-2338-96-603 et al	Rate Increase
Sunrise Vistas Utilities Company – Water Division	U-2625-97-074	Rate Increase
Sunrise Vistas Utilities Company – Sewer Division	U-2625-97-075	Rate Increase
Holiday Enterprises, Inc. dba Holiday Water Company	U-1896-97-302	Rate Increase
Gardener Water Company	U-2373-97-499	Rate Increase
Cienega Water Company	W-2034-97-473	Rate Increase
Rincon Water Company	W-1723-97-414	Financing/Auth. To Issue Stock
Vail Water Company	W-01651A-97-0539 et al	Rate Increase
Bermuda Water Company, Inc.	W-01812A-98-0390	Rate Increase
Bella Vista Water Company	W-02465A-98-0458	Rate Increase
Pima Utility Company	SW-02199A-98-0578	Rate Increase

RESUME OF RATE CASE AND REGULATORY PARTICIPATION (Cont.)

<u>Utility Company</u>	<u>Docket No.</u>	<u>Type of Proceeding</u>
Pineview Water Company	W-01676A-99-0261	WIFA Financing
I.M. Water Company, Inc.	W-02191A-99-0415	Financing
Marana Water Service, Inc.	W-01493A-99-0398	WIFA Financing
Tonto Hills Utility Company	W-02483A-99-0558	WIFA Financing
New Life Trust, Inc. dba Dateland Utilities	W-03537A-99-0530	Financing
GTE California, Inc.	T-01954B-99-0511	Sale of Assets
Citizens Utilities Rural Company, Inc.	T-01846B-99-0511	Sale of Assets
MCO Properties, Inc.	W-02113A-00-0233	Reorganization
American States Water Company	W-02113A-00-0233	Reorganization
Arizona-American Water Company	W-01303A-00-0327	Financing
Arizona Electric Power Cooperative	E-01773A-00-0227	Financing
360networks (USA) Inc.	T-03777A-00-0575	Financing
Beardsley Water Company, Inc.	W-02074A-00-0482	WIFA Financing
Mirabell Water Company	W-02368A-00-0461	WIFA Financing
Rio Verde Utilities, Inc.	WS-02156A-00-0321 et al	Rate Increase/ Financing
Arizona Water Company	W-01445A-00-0749	Financing
Loma Linda Estates, Inc.	W-02211A-00-0975	Rate Increase
Arizona Water Company	W-01445A-00-0962	Rate Increase
Mountain Pass Utility Company	SW-03841A-01-0166	Financing
Picacho Sewer Company	SW-03709A-01-0165	Financing
Picacho Water Company	W-03528A-01-0169	Financing
Ridgeview Utility Company	W-03861A-01-0167	Financing
Green Valley Water Company	W-02025A-01-0559	Rate Increase
Bella Vista Water Company	W-02465A-01-0776	Rate Increase

RESUME OF RATE CASE AND REGULATORY PARTICIPATION (Cont.)

<u>Utility Company</u>	<u>Docket No.</u>	<u>Type of Proceeding</u>
Arizona Water Company	W-01445A-02-0619	Rate Increase
Arizona-American Water Company	W-01303A-02-0867 et al.	Rate Increase
Arizona Public Service Company	E-01345A-03-0437	Rate Increase
Rio Rico Utilities, Inc.	WS-02676A-03-0434	Rate Increase
Qwest Corporation	T-01051B-03-0454	Renewed Price Cap
Chaparral City Water Company	W-02113A-04-0616	Rate Increase
Arizona Water Company	W-01445A-04-0650	Rate Increase
Tucson Electric Power	E-01933A-04-0408	Rate Review
Southwest Gas Corporation	G-01551A-04-0876	Rate Increase
Arizona-American Water Company	W-01303A-05-0405	Rate Increase
Black Mountain Sewer Corporation	SW-02361A-05-0657	Rate Increase
Far West Water & Sewer Company	WS-03478A-05-0801	Rate Increase
Gold Canyon Sewer Company	SW-02519A-06-0015	Rate Increase
Arizona Public Service Company	E-01345A-05-0816	Rate Increase
Arizona-American Water Company	W-01303A-05-0718	Transaction Approval
Arizona-American Water Company	W-01303A-05-0405	ACRM Filing
Arizona-American Water Company	W-01303A-06-0014	Rate Increase
UNS Gas, Inc.	G-04204A-06-0463	Rate Increase
Arizona-American Water Company	WS-01303A-06-0491	Rate Increase
UNS Electric, Inc.	E-04204A-06-0783	Rate Increase
Arizona-American Water Company	W-01303A-07-0209	Rate Increase
Tucson Electric Power	E-01933A-07-0402	Rate Increase
Southwest Gas Corporation	G-01551A-07-0504	Rate Increase
Chaparral City Water Company	W-02113A-07-0551	Rate Increase
Arizona Public Service Company	E-01345A-08-0172	Rate Increase

RESUME OF RATE CASE AND REGULATORY PARTICIPATION (Cont.)

<u>Utility Company</u>	<u>Docket No.</u>	<u>Type of Proceeding</u>
Johnson Utilities, LLC	WS-02987A-08-0180	Rate Increase
Arizona-American Water Company	W-01303A-08-0227 et al.	Rate Increase
UNS Gas, Inc.	G-04204A-08-0571	Rate Increase
Arizona Water Company	W-01445A-08-0440	Rate Increase
Far West Water & Sewer Company	WS-03478A-08-0608	Interim Rate Increase
Black Mountain Sewer Corporation	SW-02361A-08-0609	Rate Increase
Global Utilities	SW-02445A-09-0077 et al.	Rate Increase
Litchfield Park Service Company	SW-01428A-09-0104 et al.	Rate Increase
UNS Electric, Inc.	E-04204A-09-0206	Rate Increase
Rio Rico Utilities, Inc.	WS-02676A-08-09-0257	Rate Increase
Arizona-American Water Company	W-01303A-09-0343	Rate Increase
Bella Vista Water Company	W-02465A-09-0411 et al.	Rate Increase
Qwest/CenturyLink	T-04190A-10-0194 et al.	Merger