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November 30, 2010

Blessing N. Chukwu
Executive Consultant III
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Re: Rigby Water Company - Application for approval of transfer of assets of Rigby Water Company to the City of Avondale and Cancellation of its Certificate of Convenience and Necessity located in Maricopa County, Arizona; Docket No. W-01808A-10-0390

Dear Ms. Chukwu:

We write to follow up on our November 8, 2010 response to your letter of October 27, 2010 requesting additional information with respect to the above-entitled Application (the "Insufficiency Letter"). Specifically, we write to clarify the water use data that accompanied our prior response as Exhibit D. As noted in conversations with yourself and Del Smith, the data submitted for Rigby Water Company's Holly Acres system (PWS07-608) indicated that Rigby Water Company had sold more water than had been pumped.

To investigate, Rigby Water Company personnel pumped the Holly Acres well for 15 minutes and recorded the amount of water pumped. According to the existing meter readings, the well produced 65.4 gallons per minute. Rigby Water Company then replaced the existing meter with a new meter and ran a second 15 minute pumping test. The new meter recorded that the well was producing 70 gallons per minute, or 4.6 gallons per minute more than the existing meter recorded. Dividing the total reported amount of water pumped by the Holly Acres well by 65.4, the gallons per minute figure obtained by testing the existing well meter, produces the approximate number of minutes the well pumped for 2009 (12,155,000 gal./65.4 gal./min = 185,856 min. run). Multiplying that figure by the 70 gallons per minute recorded by the new meter indicates that the Holly Acres well actually pumped approximately 13,009,939 gallons in 2009 (185,856 min. x 70 gal./min. = 13,009,939), or 426,339 gallons more than were sold in 2009. Rigby Water Company has now replaced the faulty meter.

We trust that this supplemental information addresses the concerns raised in our discussions. If you need any additional information, please let us know. As noted in

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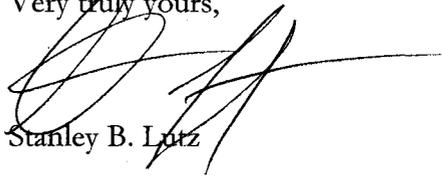
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our original response, this proposed transfer is in settlement of a condemnation suit and receipt of Rigby Water Company's constitutionally mandated just compensation is contingent upon cancellation of Rigby Water Company's Certificate of Convenience and Necessity. Therefore, any assistance you can provide in expediting this matter would be appreciated.

Very truly yours,

A handwritten signature in black ink, appearing to read "SBL", with a long horizontal line extending to the right.

Stanley B. Lutz

SBL