

ORIGINAL



0000122567

BEFORE THE ARIZONA CORPORATION COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

COMMISSIONERS

2004 FEB -6 P 1:01

MARC SPITZER - CHAIRMAN

WILLIAM A. MUNDELL

JEFF HATCH-MILLER

MIKE GLEASON

KRISTIN K. MAYES

AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF ARIZONA-AMERICAN WATER COMPANY, INC., AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE CURRENT FAIR VALUE OF ITS UTILITY PLANT AND PROPERTY AND FOR INCREASES IN ITS RATES AND CHARGES BASED THEREON FOR UTILITY SERVICE BY ITS SUN CITY WEST WATER AND WASTEWATER DISTRICTS.

Docket No. WS-01303A-02-0867

IN THE MATTER OF THE APPLICATION OF ARIZONA-AMERICAN WATER COMPANY, INC., AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE CURRENT FAIR VALUE OF ITS UTILITY PLANT AND PROPERTY AND FOR INCREASES IN ITS RATES AND CHARGES BASED THEREON FOR UTILITY SERVICE BY ITS SUN CITY WATER AND WASTEWATER DISTRICTS.

Docket No. WS-01303A-02-0868

IN THE MATTER OF THE APPLICATION OF ARIZONA-AMERICAN WATER COMPANY, INC., AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE CURRENT FAIR VALUE OF ITS UTILITY PLANT AND PROPERTY AND FOR INCREASES IN ITS RATES AND CHARGES BASED THEREON FOR UTILITY SERVICE BY ITS MOHAVE WATER DISTRICT AND ITS HAVASU WATER DISTRICT.

Docket No. W-01303A-02-0869

RUCO'S RESPONSE TO ARIZONA-AMERICAN WATER COMPANY'S MOTION

Arizona Corporation Commission

DOCKETED

FEB 06 2004

DOCKETED BY

1 IN THE MATTER OF THE APPLICATION OF
2 ARIZONA-AMERICAN WATER COMPANY,
3 INC., AN ARIZONA CORPORATION, FOR A
4 DETERMINATION OF THE CURRENT FAIR
5 VALUE OF ITS UTILITY PLANT AND
6 PROPERTY AND FOR INCREASES IN ITS
7 RATES AND CHARGES BASED THEREON
8 FOR UTILITY SERVICE BY ITS AGUA FRIA
9 WATER DISTRICT AND ITS ANTHEM / AGUA
10 FRIA WASTEWATER DISTRICT.

Docket No. WS-01303A-02-0870

6 IN THE MATTER OF THE APPLICATION OF
7 ARIZONA-AMERICAN WATER COMPANY,
8 INC., AN ARIZONA CORPORATION, FOR A
9 DETERMINATION OF THE CURRENT FAIR
10 VALUE OF ITS UTILITY PLANT AND
11 PROPERTY AND FOR INCREASES IN ITS
12 RATES AND CHARGES BASED THEREON
13 FOR UTILITY SERVICE BY ITS TUBAC
14 WATER DISTRICT.

Docket No. W-01303A-02-0908

11 **RUCO'S RESPONSE TO ARIZONA-AMERICAN WATER COMPANY'S MOTION TO**
12 **SUPPLEMENT THE RECORD TO INCLUDE ILLUSTRATIVE SCHEDULES ON**
13 **INVERTED BLOCK RATE DESIGN**

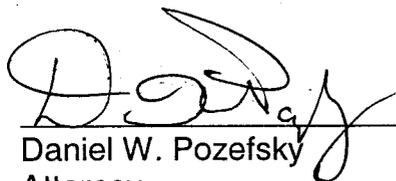
14 The Residential Utility Consumer's Office ("RUCO") hereby responds to Arizona-
15 American Water Company's ("Company") motion to supplement the record to include
16 illustrative schedules on inverted block rate design as follows: While RUCO generally
17 opposes the admission of evidence after the record is closed because other parties lack
18 the opportunity to cross-examine and offer rebuttal evidence, RUCO does not oppose the
19 Company's motion in this instance.

20 RUCO respects the Company's desire to offer an alternative rate design in
21 response to the comments made by Commissioner Mundell on the first day of the hearing.
22 Given the timing of those comments, the late filing of a supplemental rate design appears
23 appropriate in this case. Nonetheless, RUCO, nor any party for that matter, should be
24 required to waive the process to which it is otherwise entitled. RUCO intends to respond

1 to the supplemental rate design in its Reply Brief, and is therefore not requesting additional
2 process.

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

RESPECTFULLY SUBMITTED this 6th day of February, 2004.


Daniel W. Pozefsky
Attorney

1 AN ORIGINAL AND TWENTY-ONE COPIES
of the foregoing filed this 6th day
2 of February, 2004 with:

3 Docket Control
Arizona Corporation Commission
4 1200 West Washington
Phoenix, Arizona 85007

5 COPIES of the foregoing hand-delivered/
6 mailed this 6th day of February, 2004 to:

7 Teena Wolfe
Administrative Law Judge
8 Arizona Corporation Commission
1200 West Washington
9 Phoenix, Arizona 85007

Frank J. Grimmelmann
42441 North Cross Timbers Court
Anthem, Arizona 85068

10 Tim Sabo, Staff Attorney
Legal Division
11 Arizona Corporation Commission
1200 West Washington
12 Phoenix, Arizona 85007

Raymond E. Dare
Sun City Taxpayers Association
12611 North 103rd Avenue, Suite D
Sun City, Arizona 85351

13 Ernest Johnson, Director
Utilities Division
14 Arizona Corporation Commission
1200 West Washington
15 Phoenix, Arizona 85007

Walter W. Meek
AUIA
2100 North Central Avenue
Suite 210
Phoenix, Arizona 85004

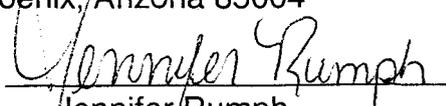
16 Norman D. James
Jay L. Shapiro
17 Fennemore Craig
3003 North Central Avenue, Suite 2600
18 Phoenix, Arizona 85012

John A. Buric
Warner, Angle, Hallam, Jackson &
Formanek, P.L.C.
3550 North Central Avenue
Suite 1550
Phoenix, Arizona 85012

19 William P. Sullivan
Paul R. Michaud
20 Paula A. Williams
Martinez & Curtis
21 2712 North 7th Street
Phoenix, Arizona 85006

Kenneth C. Sundlof, Jr.
Robert Taylor
Jennings, Strouss & Salmon, P.L.C.
The Collier Center, 11th Floor
201 East Washington
Phoenix, Arizona 85004

22 Carlton G. Young
23 3203 West Steinbeck Drive
Anthem, Arizona 85068

By 
Jennifer Rumph

24