

ORIGINAL
OPEN MEETING



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MEMORANDUM

Arizona Corporation Commission

DOCKETED

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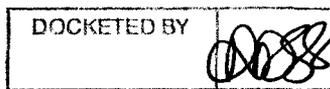
2011 FEB 15 P 3:01

AZ CORP COMMISSION
DOCKET CONTROL

TO: THE COMMISSION

FROM: Utilities Division

DATE: February 15, 2011



RE: ARIZONA-AMERICAN WATER COMPANY - APPROVAL OF LOW INCOME PROGRAM IN THE SUN CITY WATER DISTRICT (DOCKET NOS. SW-01303A-09-0343 AND W-01303A-09-0343)

I. Introduction and Background

In Decision No. 72047, dated January 6, 2011, the Arizona Corporation Commission ("Commission"), ordered that Arizona-American Water Company ("Company") file, within 60 days, or sooner if possible, for review by Utilities Division Staff ("Staff"), an application for approval of changes to the Sun City Low Income Program that generally incorporate the program outlined in Exhibit B to the Decision, in order to extend the benefit of the Sun City Low Income Program to condominium and other multi-housing dwellers. The Commission further ordered Staff to review the Company's Sun City Low Income program filing and prepare and docket, within 60 days of the Company's filing, a Recommended Order regarding the Company's proposed changes to the Sun City Low Income Program.

The issue of extending the low income program to condominium residents was first raised during Phase I of the rate case proceedings in this matter. On April 20, 2010, the Administrative Law Judge noted that, during public comment, it had come to her attention that many of the low income residents in the Sun City area may be condo dwellers and therefore unable to take advantage of the low income program. At that time, the Company was asked to investigate how it might administer such a program to condo dwellers.

During Phase II of the proceeding, on May 19, 2010, the Company reported that it had already begun to explore the possibilities and would focus its efforts on this endeavor as soon as the rate proceedings had concluded. The Company noted its belief that it had the authority to implement this change in the program without an order, but confirmed its willingness to make a compliance filing after the case ended that would align with whatever was eventually ordered in the Decision.¹

In a post-hearing filing docketed on July 30, 2010, the Company stated that it explored three options, two of which were determined to be unworkable. The third and viable alternative involved the Company working collaboratively with the Sun City Taxpayers Association

¹ Decision No. 72047, referenced above, subsequently issued Jan. 6, 2011.

("SCTPA") to administer the low income program for Sun City condominium and other multi-housing customers at a nominal cost.

Under the terms of an agreement with SCTPA, the Company will periodically fund SCTPA to provide financial assistance to qualified condominium residents. The Company states in this application that it already provided SCTPA funding in the amount of \$15,000 on November 8, 2010, and as of the date of its filing over 35 condominium residents were enrolled in the program and will be receiving checks semi-annually for credits earned.²

On December 21, 2010, the Company filed the instant application, describing its formal proposal to expand the Sun City Water District Low Income Program and requesting approval. The above-mentioned Decision in the rate case was issued January 6, 2011, and contained the provision memorializing the Commission's order to the Company to do so.

This memo and recommended order is submitted by Staff, also pursuant to Decision 72047. Staff notes that the recommendations contained in this filing are applicable only to condominium residents and other multi-housing dwellers as defined herein.³

II. Features of the Low Income Program for Condominium and other Multi-Housing Dwellers

The Company's application specifies the following key features of the program:

1. SCTPA will process and provide low income program credits (\$4.50 per month, effective January 1, 2011) for condominium residents only. The Company will continue to provide credits on bills for all other enrolled customers.
2. SCTPA will determine eligibility for the program for the condominium residents based on established program parameters.
3. SCTPA will establish accounting procedures to record information about each qualified condominium resident and the low income credit amounts provided.

² In response to Staff data request 1.2, the Company indicated that a "Check Preparation Authorization Report," will be prepared on a semi-annual basis in May and November of each year. The purpose of this report is to provide a listing of each customer that should receive a rebate check and the amount of the check. The checks will be mailed directly to the participant. However, the date the checks will be mailed has not been established the Company. The Company also stated that program enrollees had increased to 72 condominium residents.

³ Sun City's existing Low Income Program for residential customers will remain unchanged as described in Commission Decision No. 70351.

4. SCTPA will maintain a separate bank account for this program and will, upon request, make records available to the Company or another intervenor for review in future rate cases (*e.g.*, Commission Staff).
5. SCTPA will be reimbursed for direct non-labor costs to administer this program (*e.g.*, banking and record keeping fees) and for SCTPA's actual labor costs to the extent any paid employees support the program, as typically volunteers process applications.
6. SCTPA will periodically inform the Company of the number of low income program enrollees in order for the Company to monitor the 1,000 customer ceiling for this program. If the 1,000-customer threshold is reached, SCTPA will not enroll any further customers and, if necessary, will work with the Company to gradually reduce the number to 1,000.
7. The Company will periodically replenish the low income program account through a lump-sum payment based on the anticipated requirements of the program.
8. SCTPA will maintain a waiting list if the low income program is fully subscribed.

III. Staff's Analysis of the Program

Except for the amount of the monthly low income credit, Staff is in general agreement with each of the eight features specific to the condominium and multi-housing dwellers. Additionally, the Company intends to apply the eligibility requirements of its existing low income tariff which applies to non-multi-unit customers. Those eligibility requirements are presented below. Staff objects to one of the eligibility requirements in the non-multi-unit customer tariff. Staff also recommends that the low income tariff for condominium and multi-housing dwellers include additional requirements and language not included in the existing tariff for non-multi-unit customers.

The amount of the monthly low income credits should be \$4.38, or one-half of the monthly minimum charge for a 5/8 x 3/4-inch meter, instead of \$4.50 as stated in the Company's application. The Sun City low income program is funded by adding to the base high block commodity rate. The high block adder corresponding to the \$4.38 credit and calculated in accordance with Decision No. 72047 is \$0.0251 per 1,000 gallons⁴ instead of the \$0.026 per 1,000 gallons rate stated in the Company's application.

⁴ (1,000 customers x 12 months/year x \$4.38/month) / 2,093,842 gallons in the high block annually = \$0.0251 per 1,000 gallons.

IV. Company's Proposed Multi-unit Low Income Tariff Eligibility Requirements

According to the Company, the eligibility requirements for multi-unit low income credit are as follows:

1. Be a Condominium resident in Sun City or Youngtown, Arizona.
2. Be 65 years old or older.
3. Have annual income that does not exceed \$16,245 for a single household or \$21,855 for a two-person household.

A. Age Requirement

Staff disagrees with the Company's proposal to include an age restriction that requires applicants to be at least 65 years old. The purpose of the Sun City low income program is to assist economically distressed customers in paying for essential water service. Need for economic assistance is not limited to those at least 65 years old. Accordingly, Staff does not recommend including age as a low income tariff eligibility requirement.

B. Income Eligibility Requirement

In response to a Staff data request, the Company stated that it would utilize a self-certification method.⁵ In an effort to establish some sense of uniformity among water and wastewater providers,⁶ Staff recommends that the following requirements and language be included in the Sun City Low Income Program applicable to condominium and other multi-housing dwellers:

1. The applicant must attach a sworn affidavit to the application stating that he/she meets the annual income threshold.
2. The applicant may not be claimed as a dependent on another person's tax return.
3. The applicant must reapply each time he/she moves residences.

⁵ In response to Staff data request 1.7, the Company indicated the following, "Instructions from the Company were that compliance with eligibility standards is by self-certification. However, SCTA intends to examine an applicant's monthly income by source breaks down monthly income with the applicants signing the application indicating that the information is true and correct and that they will provide proof of income if requested. They also agree to notify SCTA if their residence or annual income changes materially."

⁶ Staff used the filed low income program tariffs for Coronado Utilities, Inc., Groom Creek Water Users Association, and Litchfield Park Service Company as sources.

4. The applicant must recertify each year by submitting a declaration attesting to continuing eligibility.
5. The applicant must renew the application every two (2) years, or sooner, if requested.
6. Refusal or failure of a customer to provide documentation of eligibility acceptable to the Company, upon request by the Company, shall result in removal from this rate schedule.
7. Rebilling of customers under the applicable rate schedule may occur for periods of ineligibility previously billed under the low income tariff.
8. For the purposes of the program, "annual income" means the value of all money and non-cash benefits, available for living expenses, from all sources, both taxable and non-taxable, before deductions, for all people who live with the applicant in the condominium or multi-unit dwelling.⁷

Staff concludes that including these requirements and language in the Sun City Low Income Program for condominium and other multi-unit dwellings is appropriate for clarity and to reduce risk of fraud. Staff further concludes that the Company should place all of these additional requirements and language in a revised tariff applicable to condominium and other multi-housing dwellers and docket it within 30 days of a Decision in this case.

V. Reporting requirements and true-up applicable to condominium residents and other multi-housing dwellers

Staff recommends that the Company submit an annual report detailing the number of participants for the year, the discounts given to participants, direct and indirect labor costs associated with the program, collections made from the high block rate used to fund the program, and provide updated gross annual income guidelines as necessary from the federal government. The Company shall report the balance of the low income program (i.e., funding amount from high block usage less checks sent to customers and direct and indirect labor costs associated with the program) and shall include all supporting documentation with its submission.

Staff recommends that the true-up between the program costs and the funding collected, as well as the reset of the high block rate, be completed as part of the Company's next permanent rate case for the Sun City Water district.

VI. Conclusions and Recommendations

Staff recommends approval of the expansion of the Sun City Low Income Program to include condominium residents and other multi-housing dwellers with the following provisions:

⁷ This definition is consistent with that approved by this Commission in other low income programs and is also consistent with the definition of income as used by the U.S. Census Bureau.

Staff recommends \$4.38 as the amount of the monthly low income credit, and \$0.0251 per 1,000 gallons as the high block adder for funding the low income program.

Staff recommends that the eligibility requirements not include an age restriction.

Staff recommends that the Sun City Low Income Program for condominiums and other multi-housing dwellers include the following requirements and language:

1. The applicant must attach a sworn affidavit to the application stating that he/she meets the annual income threshold.
2. The applicant may not be claimed as a dependent on another person's tax return.
3. The applicant must reapply each time he/she moves residences.
4. The applicant must recertify each year by submitting a declaration attesting to continuing eligibility.
5. The applicant must renew the application every two (2) years, or sooner, if requested.
6. Refusal or failure of a customer to provide documentation of eligibility acceptable to the Company, upon request by the Company or its agent, shall result in removal from this rate schedule.
7. Rebilling of customers under the applicable rate schedule may occur for periods of ineligibility previously billed under the low income tariff.
8. For the purposes of the program, "annual income" means the value of all money and non-cash benefits, available for living expenses, from all sources, both taxable and non-taxable, before deductions, for all people who live with the applicant in the condominium or multi-unit dwelling.

Staff recommends that the Company file a Condominium and Other Multi-unit Housing Dwellers Low Income tariff that is consistent with Staff's recommendations, with Docket Control, within 30 days of a Decision in this case.

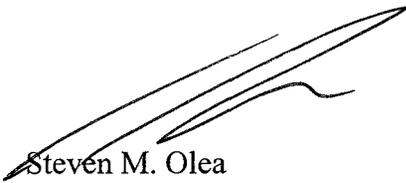
Staff recommends that the Company file with Docket Control, in March each year, beginning with March 2012, an annual report detailing the number of participants for the year, the discounts given to participants, direct and indirect costs associated with the program, collections made from the high block rate used to fund the program, and provide updated gross annual income guidelines as necessary from the federal government. The Company shall report the balance of the low income program (i.e., funding amount from high block usage less checks sent to customers and direct and indirect costs associated with the program) and shall include all supporting documentation with its submission.

THE COMMISSION

February 15, 2011

Page 7

Staff recommends that the true-up between the program costs and the funding collected, as well as the reset of the high block rate, be completed as part of the Company's next permanent rate case for the Sun City Water district.



Steven M. Olea
Director
Utilities Division

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ORIGINATOR: Jeffrey M. Michlik

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BEFORE THE ARIZONA CORPORATION COMMISSION

GARY PIERCE
Chairman
BOB STUMP
Commissioner
SANDRA D. KENNEDY
Commissioner
PAUL NEWMAN
Commissioner
BRENDA BURNS
Commissioner

IN THE MATTER OF THE APPLICATION)
ARIZONA-AMERICAN WATER)
COMPANY , AN ARIZONA PUBLIC)
SERICE CORPORATION, FOR APPROVAL)
OF LOW INCOME PROGRAM IN THE)
SUN CITY WATER DISTRICT)

DOCKET NO. SW-01303A-09-0343
W-01303A-09-0343

DECISION NO. _____
ORDER

Open Meeting
March 1 and 2, 2011
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

I. Introduction and Background

1. In Decision No. 72047, dated January 6, 2011, the Arizona Corporation Commission ("Commission"), ordered that Arizona-American Water Company ("Company") file, within 60 days, or sooner if possible, for review by Utilities Division Staff ("Staff"), an application for approval of changes to the Sun City Low Income Program that generally incorporate the program outlined in Exhibit B to the Decision, in order to extend the benefit of the Sun City Low Income Program to condominium and other multi-housing dwellers. The Commission further ordered Staff to review the Company's Sun City Low Income program filing and prepare and docket, within 60 days of the Company's filing, a Recommended Order regarding the Company's proposed changes to the Sun City Low Income Program.

...

1 2. The issue of extending the low income program to condominium residents was first
2 raised during Phase I of the rate case proceedings in this matter. On April 20, 2010, the
3 Administrative Law Judge noted that, during public comment, it had come to her attention that
4 many of the low income residents in the Sun City area may be condo dwellers and therefore unable
5 to take advantage of the low income program. At that time, the Company was asked to investigate
6 how it might administer such a program to condo dwellers.

7 3. During Phase II of the proceeding, on May 19, 2010, the Company reported that it
8 had already begun to explore the possibilities and would focus its efforts on this endeavor as soon
9 as the rate proceedings had concluded. The Company noted its belief that it had the authority to
10 implement this change in the program without an order, but confirmed its willingness to make a
11 compliance filing after the case ended that would align with whatever was eventually ordered in
12 the Decision.¹

13 4. In a post-hearing filing docketed on July 30, 2010, the Company stated that it
14 explored three options, two of which were determined to be unworkable. The third and viable
15 alternative involved the Company working collaboratively with the Sun City Taxpayers
16 Association (“SCTPA”) to administer the low income program for Sun City condominium and
17 other multi-housing customers at a nominal cost.

18 5. Under the terms of an agreement with SCTPA, the Company will periodically fund
19 SCTPA to provide financial assistance to qualified condominium residents. The Company states
20 in this application that it already provided SCTPA funding in the amount of \$15,000 on November
21 8, 2010, and as of the date of its filing over 35 condominium residents were enrolled in the
22 program and will be receiving checks semi-annually for credits earned.²

23 6. On December 21, 2010, the Company filed the instant application, describing its
24 formal proposal to expand the Sun City Water District Low Income Program and requesting
25 _____

26 ¹ Decision No. 72047, referenced above, subsequently issued Jan. 6, 2011.

27 ² In response to Staff data request 1.2, the Company indicated that a “Check Preparation Authorization Report”, will
28 be prepared on a semi-annual basis in May and November of each year. The purpose of this report is to provide a
listing of each customer that should receive a rebate check and the amount of the check. The checks will be mailed
directly to the participant. However, the date the checks will be mailed has not been established the Company. The
Company also stated that program enrollees had increased to 72 condominium residents.

1 approval. The above-mentioned Decision in the rate case was issued January 6, 2011, and
2 contained the provision memorializing the Commission's order to the Company to do so.

3 7. Staff states that its conclusions and recommendations apply only to condominium
4 residents and other multi-housing dwellers as defined in its memo.³

5 **II. Features of the Low Income Program for Condominium and other Multi-Housing**
6 **Dwellers**

7 8. The Company's application specifies the following key features of the program:

8 a. SCTPA will process and provide low income program credits (\$4.50 per month,
9 effective January 1, 2011) for condominium residents only. The Company will
continue to provide credits on bills for all other enrolled customers.

10 b. SCTPA will determine eligibility for the program for the condominium
11 residents based on established program parameters.

12 c. SCTPA will establish accounting procedures to record information about each
qualified condominium resident and the low income credit amounts provided.

13 d. SCTPA will maintain a separate bank account for this program and will, upon
14 request, make records available to the Company or another intervenor for
review in future rate cases (e.g., Commission Staff).

15 e. SCTPA will be reimbursed for direct non-labor costs to administer this program
16 (e.g., banking and record keeping fees) and for SCTPA's actual labor costs to
17 the extent any paid employees support the program, as typically volunteers
process applications.

18 f. SCTPA will periodically inform the Company of the number of low income
19 program enrollees in order for the Company to monitor the 1,000 customer
20 ceiling for this program. If the 1,000-customer threshold is reached, SCTPA
will not enroll any further customers and, if necessary, will work with the
21 Company to gradually reduce the number to 1,000.

22 g. The Company will periodically replenish the low income program account
23 through a lump-sum payment based on the anticipated requirements of the
program.

24 h. SCTPA will maintain a waiting list if the low income program is fully
25 subscribed.

25 ...

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28 ³ Sun City's Low Income Program applicable to residential customers will remain unchanged as described in
Commission Decision No. 70351.

1 **III. Staff's Analysis of the Program**

2 9. Except for the amount of the monthly low income credit, Staff is in general
3 agreement with each of the eight features specific to the condominium and multi-housing dwellers.
4 Additionally, the Company intends to apply the eligibility requirements of its existing low income
5 tariff which applies to non-multi-unit customers, as presented below. Staff objects to one of the
6 eligibility requirements in the non-multi-unit customer tariff. Staff also recommends that the low
7 income tariff for condominium and multi-housing dwellers include additional requirements and
8 language not included in the existing tariff for non-multi-unit customers.

9 10. Staff states that the amount of the monthly low income credits should be \$4.38, or
10 one-half of the monthly minimum charge for a 5/8 x 3/4-inch meter, instead of \$4.50 as stated in
11 the Company's application.

12 11. The Sun City low income program is funded by adding to the base high block
13 commodity rate. The high block adder corresponding with the \$4.38 credit and
14 calculated in accordance with Decision No. 72047 is \$0.0251 per 1,000 gallons⁴ instead of \$0.026
15 per 1,000 gallons rate stated in the Company's application.

16 **IV. Company's Proposed Multi-unit Low Income Tariff Eligibility Requirements**

17 12. According to the Company, the eligibility requirements for multi-unit low income
18 credit are as follows:

- 19 a. Be a Condominium resident in Sun City or Youngtown Arizona.
20 b. Be 65 years old or older.
21 c. Have annual income that does not exceed \$16,245 for a single household or
22 \$21,855 for a two-person household.

23 **A. Age Requirement**

24 13. Staff disagrees with the Company's proposal to include an age restriction that
25 requires applicants to be at least 65 years old. The purpose of the Sun City low income program is
26 to assist economically distressed customers in paying for essential water service. Need for
27 _____

28 ⁴ (1,000 customers x 12 months/year x \$4.38/month) / 2,093,842 gallons in the high block annually = \$0.0251 per 1,000 gallons.

1 economic assistance is not limited to those at least 65 years old. Accordingly, Staff does not
 2 recommend including age as a low income tariff eligibility requirement.

3 **B. Income Eligibility Requirement**

4 14. In response to a Staff data request, the Company stated that it would utilize a self-
 5 certification method.⁵ In an effort to establish some sense of uniformity among water and
 6 wastewater providers,⁶ Staff recommends that the following requirements and language be
 7 included in the Sun City Low Income Program applicable to condominium and other multi-
 8 housing dwellers:

- 9 a. The applicant must attach a sworn affidavit to the application stating that he/she
 10 meets the annual income threshold.
 11 b. The applicant may not be claimed as a dependent on another person's tax return.
 12 c. The applicant must reapply each time he/she moves residences.
 13 d. The applicant must recertify each year by submitting a declaration attesting to
 14 continuing eligibility.
 15 e. The applicant must renew the application every two (2) years, or sooner, if
 16 requested.
 17 f. Refusal or failure of a customer to provide documentation of eligibility
 18 acceptable to the Company, upon request by the Company, shall result in
 19 removal from this rate schedule.
 20 g. Rebilling of customers under the applicable rate schedule may occur for periods
 21 of ineligibility previously billed under the low income tariff.
 22 h. For the purposes of the program "annual income" means the value of all money
 23 and non-cash benefits, available for living expenses, from all sources, both
 24 taxable and non-taxable, before deductions for all people who live with the
 25 applicant in the condominium or multi-unit dwelling.

26 ⁵ In response to Staff data request 1.7, the Company indicated the following "Instructions from the Company were that
 27 compliance with eligibility standards is by self-certification. However, SCTA intends to examine an applicant's
 28 monthly income by source breaks down monthly income with the applicants signing the application indicating that the
 information is true and correct and that they will provide proof of income if requested. They also agree to notify
 SCTA if their residence or annual income changes materially."

⁶ Staff used the filed low income program tariffs for Coronado Utilities, Inc., Groom Creek Water Users Association,
 and Litchfield Park Service Company as sources.

ORDER

1
2 IT IS THEREFORE ORDERED that the application by Arizona-American Water
3 Company for the implementation of a Sun City Water District Low Income Program for
4 condominium residents and other multi-housing customers, as modified herein, is hereby
5 approved.

6 IT IS FURTHER ORDERED that the refund credit amount shall be \$4.38 per month, and
7 the high block funding amount shall be \$0.0251 per 1,000 gallons, to be consistent with Decision
8 No. 72047.

9 IT IS FURTHER ORDERED that the low income tariff shall not include an age eligibility
10 requirement.

11 IT IS FURTHER ORDERED that the Sun City Low Income Program for condominiums
12 and other multi-housing dwellers include the following requirements and language:

- 13 • The applicant must attach a sworn affidavit to the application stating that he/she meets
14 the annual income threshold.
- 15 • The applicant may not be claimed as a dependent on another person's tax return.
- 16 • The applicant must reapply each time he/she moves residences.
- 17 • The applicant must recertify each year by submitting a declaration attesting to
18 continuing eligibility.
- 19 • The applicant must renew the application every two (2) years, or sooner, if requested.
- 20 • Refusal or failure of a customer to provide documentation of eligibility acceptable to
21 the Company, upon request by the Company or its agent, shall result in removal from
22 this rate schedule.
- 23 • Rebilling of customers under the applicable rate schedule may occur for periods of
24 ineligibility previously billed under the low income tariff.
- 25 • For the purposes of the program, "annual income" means the value of all money and
26 non-cash benefits, available for living expenses, from all sources, both taxable and non-
taxable, before deductions, for all people who live with the applicant in the
condominium or multi-unit dwelling.

27 IT IS FURTHER ORDERED that Arizona-American Water Company file with Docket
28 Control, by March each year, beginning with March 2012, an annual report detailing the number of

1 participants for the previous calendar year, the discounts given to participants, direct and indirect
2 costs associated with the program, collections made from the high block rate used to fund the
3 program, and provide updated gross annual income guidelines as necessary from the federal
4 government. The report shall include the balance of the low income program (i.e., funding amount
5 from high block usage less checks sent to customers and direct and indirect costs associated with
6 the program) and shall include all supporting documentation.

7 IT IS FURTHER ORDERED that the true-up between the program costs and the funding
8 collected, as well as the reset of the high block rate, be completed as part of the Company's next
9 permanent rate case for the Sun City Water district

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1 IT IS FURTHER ORDERED that Arizona-American Water Company shall file a tariff
2 consistent with that ordered herein within 30 days of a Decision in this case.

3 IT IS FURTHER ORDERED that this Decision shall become effective immediately.

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BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

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CHAIRMAN

COMMISSIONER

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COMMISSIONER

COMMISSIONER

COMMISSIONER

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IN WITNESS WHEREOF, I, ERNEST G. JOHNSON,
Executive Director of the Arizona Corporation Commission,
have hereunto, set my hand and caused the official seal of
this Commission to be affixed at the Capitol, in the City of
Phoenix, this _____ day of _____, 2011.

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ERNEST G. JOHNSON
EXECUTIVE DIRECTOR

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DISSENT: _____

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DISSENT: _____

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SMO:JMM:lh\MAS

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1 SERVICE LIST FOR: Arizona-American Water Company
2 DOCKET NOS. SW-01303A-09-0343 and W-01303A-09-0343

3
4 Mr. Thomas M. Broderick
5 Director, Rates & Regulation
6 Arizona-American Water Company
7 2355 West Pinnacle Peak Road, Suite 300
8 Phoenix, Arizona 85027

9 Mr. Steven M. Olea
10 Director, Utilities Division
11 Arizona Corporation Commission
12 1200 West Washington
13 Phoenix, Arizona 85007

14 Ms. Janice Alward
15 Chief, Legal Division
16 Arizona Corporation Commission
17 1200 West Washington
18 Phoenix, Arizona 85007

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