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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

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

2011 APR -7 A 9:10
AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
DOCKETED

APR - 7 2011

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IN THE MATTER OF THE APPLICATION OF) DOCKET NO. W-02500A-10-0382
GOODMAN WATER COMPANY, AN ARIZONA)
CORPORATION, FOR (i) A DETERMINATION) **MOTION FOR LIMITED**
OF THE FAIR VALUE OF ITS UTILITY PLANT) **REVISION OF PROCEDURAL**
AND PROPERTY AND (ii) AN INCREASE IN) **SCHEDULE AND DEADLINES**
ITS WATER RATES AND CHARGES FOR) **FOR FILING TESTIMONY**
UTILITY SERVICE BASED THEREON.)

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Pursuant to A.A.C. R-14-3-106(K), Goodman Water Company ("Company") submits this Motion for Limited Revision of Procedural Schedule and Deadlines for Filing Testimony ("Motion"). In support of its Motion, the Company submits the following information.

At page 7, line 18 – page 11, line 3 of his March 21, 2011 prepared Direct Testimony, Commission Staff witness Gary T. McMurry discusses the reasons why he is recommending a reduction in the Company's land basis from \$494,159 to \$124,659 for ratemaking purposes in the instant proceeding. Among Mr. McMurry's reasons is his belief that the land parcels in question should have been appraised as to their market value during the years in which they were "devoted to public service," rather than the 2008 appraisal which the Company had previously prepared. More specifically, Mr. McMurry believes that two (2) of the parcels in question should have been appraised based on 2003 market values, one should have been appraised based upon 2004 market values and the remaining one should have been appraised based upon 2007 market values.

The Company desires to submit prepared Rebuttal Testimony based upon a new appraisal prepared by a different appraiser that will utilize market values based upon the above-indicated

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1 years. However, after contacting several different qualified appraisers in recent days, the
2 Company has learned that none would be able to provide the necessary appraisal in less than
3 three (3) weeks from today. In addition, several days thereafter would be needed in order to
4 enable the Company to prepare and file prepared Rebuttal Testimony accompanying the new
5 appraisal.

6 In addition, in his prepared Direct Testimony, Mr. McMurry also has criticized the 2008
7 appraisal prepared by Michael Naifeh for the Company. The Company wishes to submit
8 prepared Rebuttal Testimony for Mr. Naifeh which would respond to Mr. McMurry's criticisms
9 of Mr. Naifeh's appraisal. However, Mr. Naifeh's schedule is such that he also will not be in a
10 position to work with the undersigned on such prepared Rebuttal Testimony for at least another
11 week or two.

12 Accordingly, and for the above-indicated reasons, the Company hereby moves to propose
13 a limited revision in the procedural schedule and deadlines for filing testimony previously
14 established in the Commission's November 16, 2010 Procedural Order. More specifically, the
15 Company is proposing that the previously established deadline for filing its prepared Rebuttal
16 Testimony on issues relating to the subject of land value appraisals be extended from April 18,
17 2011 to May 2, 2011. The previously established April 18, 2011 deadline would remain in place
18 as to all other subjects to be addressed in the Company's prepared Rebuttal Testimony. In
19 addition, and as a related matter, the Company proposes that the previously established May 16,
20 2011 deadline for the Commission Staff's and Intervenor's filing their prepared Surrebuttal
21 Testimony be extended to May 30, 2011 for the filing of any such testimony responding to the
22 Company's prepared Rebuttal Testimony on the subject of land value appraisals. The previously
23 established May 16, 2011 deadline would remain in place as to all other subjects to be addressed
24 in the Commission Staff's and Intervenor's prepared Surrebuttal Testimony. Finally, the
25 Company proposes that the date for filing its prepared Rejoinder Testimony be extended from
26 the previously established date of June 3, 2011 to June 10, 2011 as to the subject of land value
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1 appraisals. The date of June 3, 2011 would remain as the filing date for the Company's prepared
2 Rejoinder Testimony on all other subjects.

3 In connection with the foregoing, the undersigned will endeavor to contact each of the
4 parties telephonically to advise them of the instant Motion. In that regard, it is hoped that none
5 of them will have any objections to the limited revision of procedural schedule proposed above.
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7 Dated this 5th day of April 2011.

8 Respectfully submitted,

9 

10 Lawrence V. Robertson, Jr.

11 Attorney for Goodman Water Company

12 The original and thirteen (13) copies of the
13 foregoing Motion will be mailed for filing
14 this 5th day of April 2011 to:

15 Docket Control
16 Arizona Corporation Commission
17 1200 West Washington Street
18 Phoenix, Arizona 85007

19 A copy of the foregoing Motion will
20 be emailed or mailed this same date :

21 Jane L. Rodda, Administrative Law Judge
22 Hearing Division
23 Arizona Corporation Commission
24 400 West Congress, Suite 218
25 Tucson, Arizona 85701

26 Janice Alward, Chief Counsel
27 Legal Division
28 Arizona Corporation Commission
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