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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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COMMISSIONERS

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

IN THE MATTER OF THE APPLICATION OF
JOHNSON UTILITIES L.L.C. FOR AN
EXTENSION OF ITS CERTIFICATE OF
CONVENIENCE AND NECESSITY.

DOCKET NO. WS-02987A-06-0667

**COMPLIANCE FILING, REQUEST
FOR STAFF CONFIRMATION, AND
NOTICE OF SUBSTITUTION OF
COUNSEL**

COMPLIANCE WITH DECISION 70411

In Decision 70411 (July 3, 2008), the Arizona Corporation Commission ("Commission") conditionally approved the application of Johnson Utilities, L.L.C. ("Johnson Utilities" or the "Company") to extend its certificate of convenience and necessity ("CC&N") to provide water and wastewater services for developments known as Monterra, Montessa, Florence Plaza, and portions of Walker Butte located in Pinal County, Arizona. Decision 70411 contained the following ordering paragraph regarding the effective date of the decision:

IT IS FURTHER ORDERED that this Decision shall not become effective until the first day of the month after Johnson Utilities, L.L.C., files in Docket Control documentation from the Arizona Department of Environmental Quality that the Pecan Wastewater System is in full compliance with Arizona Department of Environmental Quality and Staff files confirmation of such compliance with Docket Control, and the current rate case filing is found to be sufficient.

In Docket WS-02987A-07-0487, Johnson Utilities made a filing dated May 6, 2011 which demonstrated that the Company's Pecan Water Reclamation Plant ("Pecan WRP") was in full compliance with Arizona Department of Environmental Quality ("ADEQ") requirements. Attachment 6 to the May 6, 2011 filing was a letter from ADEQ to Johnson Utilities dated March 9, 2011 confirming the Company's full compliance with ADEQ requirements at the Pecan WRP based upon an ADEQ site inspection conducted February 16, 2011. A copy of the March 9, 2011

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1 letter and accompanying inspection report is attached as Attachment 1, and the Company's May 6,
2 2011 filing in Docket WS-02987-07-0487 is incorporated herein by this reference.

3 Upon review of the Company's May 6, 2011 filing, Staff docketed a Staff Report and
4 Proposed Order dated June 28, 2011 concluding that Johnson Utilities "has taken actions to bring
5 the [Pecan WRP] into full compliance with ADEQ."¹ The proposed order was adopted by the
6 Commission at its Open Meeting on July 12, 2011, as Decision 72502 (July 25, 2011) in Docket
7 WS-02987A-07-0487.² Thus, Johnson Utilities has satisfied the requirement of Decision 70411
8 that it file documentation that the Pecan WRP is in full compliance with the requirements of
9 ADEQ.

10 With regard to the condition that Decision 70411 is not effective until the Johnson
11 Utilities rate case filing in Docket WS-02987A-08-0180 is deemed sufficient, the Company
12 achieved sufficiency on August 1, 2008, as evidenced by the letter of sufficiency from Staff
13 attached hereto as Attachment 2. Thus, both conditions required to make Decision 70411
14 effective have now been satisfied.

15 REQUEST FOR STAFF CONFIRMATION

16 Decision 70411 states that after a filing by Johnson Utilities documenting that the
17 Company's Pecan WRP is in full compliance with the requirements of ADEQ, Staff shall confirm
18 compliance in a filing with Docket Control. Given that Johnson Utilities has demonstrated
19 compliance with the requirement, the Company requests that Staff docket confirmation of
20 compliance.

21 NOTICE OF SUBSTITUTION OF COUNSEL

22 Notice is hereby given that Johnson Utilities has changed its legal counsel in this docket,
23

24 ¹ Staff Report dated June 28, 2011, in Docket WS-02987A-07-0487.

25 ² Notwithstanding ADEQ's March 9, 2011 letter finding the Pecan WRP in full compliance, ADEQ
26 erroneously asserts in a July 12, 2011 letter to the Commission's Utilities Division director that the Pecan
27 WRP is not in full compliance because of notices of violation ("NOVs") from several years ago. None of
28 these old NOVs relate to or affect current compliance, and Johnson Utilities fully complied with the
requirements of the NOVs long ago. The Company refuted each of the erroneous assertions in ADEQ's
July 12 letter in a response dated July 26, 2011, a copy of which was provided to the Commission's
Utilities Division Director. In addition, Johnson Utilities previously provided substantial documentation
to the Utilities Division demonstrating that the Company's Pecan WRP is in full compliance with all
ADEQ requirements.

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1 and future communications, pleadings, procedural orders and other filings in this docket should
2 be addressed as follows:

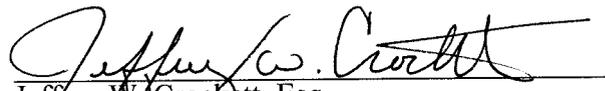
3 Jeffrey W. Crockett, Esq.
4 Brownstein Hyatt Farber Schreck LLP
5 40 North Central Avenue, 14th Floor
6 Phoenix, Arizona 85004
7 Email: jcrockett@bhfs.com
8 Direct: (602) 382-4062
9 Fax: (602) 382-4020

10 With a copy to:

11 George H. Johnson johnsongh@qwest.net
12 cc to Michelle E. Belaski mbelaski@qwest.net
13 5230 E. Shea Boulevard #200
14 Scottsdale, Arizona 85254
15 Phone: (480) 998-3300
16 Fax: (480) 483-7908

17 RESPECTFULLY submitted this 28th day of July, 2011.

18 BROWNSTEIN HYATT FARBER SCHRECK,
19 LLP

20 
21 Jeffrey W. Crockett, Esq.
22 40 N. Central Ave., 14th Floor
23 Phoenix, Arizona 85004
24 Attorneys for Johnson Utilities, L.L.C.

25 ORIGINAL and thirteen (13) copies filed
26 this 28th day of July, 2011, with:

27 Docket Control
28 ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

Copy of the foregoing hand-delivered
this 28th day of July, 2011, to:

Lyn A. Farmer, Chief Administrative Law Judge
Hearing Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

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1 Janice Alward, Chief Counsel
Legal Division
2 ARIZONA CORPORATION COMMISSION
1200 West Washington Street
3 Phoenix, Arizona 85007

4 Steve Olea, Director
Utilities Division
5 ARIZONA CORPORATION COMMISSION
1200 West Washington Street
6 Phoenix, Arizona 85007

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Attachment 1



Janice K. Brewer
Governor

RECEIVED
MAR 16 2011
ARIZONA DEPARTMENT
OF
ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Henry Darwin
Director

9 March 2011

Johnson Utilities
Attn: Gregory Brown, Director of Engineering
5230 E. Shea Blvd., Ste 200
Scottsdale, AZ 85254

Re: Inspection of Pecan WRP; Inventory Number 105324

Dear Mr. Brown:

Enclosed is an inspection report that has been prepared by the Water Quality Field Services Unit (WQFSU) of the Arizona Department of Environmental Quality (ADEQ) regarding the inspection conducted at the above referenced facility on 16 February 2011. This inspection was conducted to determine compliance with Arizona Revised Statute (A.R.S.) Title 49, Chapter 2, Article 3 and Arizona Administrative Code (A.A.C.) Title 18, Chapter 9, in accordance to the authority in A.R.S. §49-203(B)(1) and A.A.C. R18-9-110(A).

No significant new deficiencies were noted during the course of the inspection. No further action is planned as a result of this inspection.

If there are any questions regarding the inspection or attached report, please contact me directly at 602-771-7667, or by e-mail at gf2@azdeq.gov.

Sincerely,

Gregory Frech, R.S.
Water Quality Compliance Field Services Unit

cc: ADEQ, Asif Majeed, APP and Reuse Unit
Facility File- 105324
WQFSU Reading File

Northern Regional Office
1801 W. Route 66 • Suite 117 • Flagstaff, AZ 86001
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

105324 Johnson Utilities Pecan WRP
9 March 2011

**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER QUALITY DIVISION - COMPLIANCE SECTION
FIELD SERVICES UNIT**

INSPECTION REPORT- WASTEWATER

Facility: Pecan WRP
Aquifer Protection Permit (APP) No: 105324
Reuse Permit No: R105324
Inspected by: Gregory Frech

AZPDES Permit No: AZ0025445
Inspection No: 170369; 170371
Inspection Date: 16 February 2011
Accompanied by: Gregory Brown

	<u>YES</u>	<u>NO</u>	<u>N/A</u>	<u>Unknown/ Notes</u>
1. WWTF quality meets the following permit requirements:				
A. Aquifer Protection Permit				
B. Reuse Permit				
C. AZPDES Permit				
2. A certified operator is employed by the owner per ADEQ regulations.				
3. This system meets permit requirements for operation and maintenance.				

Scope and Purpose of the Inspection:

The purpose of this inspection was to determine compliance with certain aspects of the Permit, as well as to verify compliance with Arizona Revised Statutes Title 49, chapter 2, et seq. and applicable rules.

SUMMARY OF FIELD OBSERVATIONS:

Plantsite inspection: This began in the main building of the treatment plant and ended in a tour of the facility. The inspection followed the liquid flow and then the solids handling. The operators escorted on the inspection.

The attached system block diagram outlines both the liquid and the solids processes. All observed plant unit processes are accounted for in the APP permit. The plant is designed for 2 MGD but typically sees about 1.5 MGD. The plant is staffed 24/7. There are 7 operators employed by the owners of this facility.

The plant flow encounters the standard headworks with bar screening equipment. No discrete grit removal is used. Screenings are sent for disposal. The flow then goes through "extended aeration – post anoxic" in support of microbial life processes and removal of nitrogen (the permit requires A+ quality effluent). The plant is designed by "Aero-Mod" and is called a "Split ClaRator." According to the manufacturer, this design eliminates moving parts beneath the aeration tank surfaces. Return Activated Sludge (RAS) is sent back to the beginning of the unit process.

Following this, tertiary treatment (disk filters) are used and the flow is then disinfected using ultraviolet radiation equipment and Sodium hypochlorite. According to the operators there has never been any discharge under the AZPDES permit. Flow has a chlorine residual for APP permit discharge. Some of the water is used in the adjacent pecan grove (see photo log figure 13) which also contains small ponds to buffer the percolation rates.

The solids handling begins with the wasting of the sludge (WAS or waste activated sludge) to the aerobic digesters. From there the sludge is dewatered using the belt press. The sludge is deposited in a dumpster for disposal. The belt press filtrate is sent back to the head of the plant.

The odor control system at the plant included a carbon system which eliminates odors directly as the air stream passes through the media. An odor complaint (ADEQ #C7595) preceded this inspection by a few days but the inspection had already been scheduled. The operators said that they had visited the complaining citizen's residence to talk about her concerns. I could smell very slight odor near the carbon filter system and remarked about it to the operators. I also noted that the headworks building doors did not show negative pressure when I used the door. I asked if they had thought about adding a counter-current Sodium hydroxide system to be put in front of the carbon units to help eliminate odor escapes since the carbon unit might occasionally get overtaxed. The operators said that they were considering it.

The plant did present an appearance which indicates operators provide good housekeeping throughout: The site does appear meticulously maintained in regard to the equipment in every unit process - except for the bar screening equipment in the headworks. Access to the raised bar screen was limited: One access ladder was unstable and the other had limited headroom at the top of the ladder. The area was generally dark and dirty. Redundant hydraulic and other systems throughout the facility were available and in good working order.

Operator log sheets and/or computer logs were present during the inspection.

SCADA (Supervisory Control and Data Acquisition): the software for the system is from Allen-Bradley and is called "Panel View Plus 1000." No keyboard is used, instead the SCADA screen uses touch technology for the operator interface. The system also relies on some PLCs (Programmable Logic Controllers) for input to the SCADA. Typically, PLCs can be used should the SCADA fail. Also available are H/O/A "hand/off/auto" switches for ultimate manual control of the equipment by certified operators.

105324 Johnson Utilities Pecan WRP
9 March 2011

Collection system sample check: We toured a selected lift station in the collection system (figures 9-12). The equipment was in good condition with the site secured behind a locked, gated, enclosure. There is a gap under one corner of the fence. The gap is approximately 12 inches high and would allow a person to slide beneath the fence and gain entry. Operator logs were kept for the site. The internal components of the lift station were in good condition with no or little evidence of deterioration from the normally corrosive atmospheres encountered: The interior walls showed no evidence of corrosion and the motor rails were also in good condition. A small carbon odor control system was also available as needed. The site was clear of debris and easily accessed.

Emergency Plans and Operations & Maintenance (O&M) manual: The emergency plans were available but had outdated phone listings. The O&M manual was supplied by the vendor and was available to operators.

Pretreatment program sample check: the system does not have a flow rate above 5MGD and has no Significant Industrial or Categorical Users. No formal pretreatment program is required based on those two characteristics.

Fats Oil and Grease (FOG) program: The treatment plant did not show much evidence of FOG in the unit processes. The operators report that only 5 or 6 interceptors contribute to the collection system. No FOG program was in force.

MONITORING AND REPORTING REQUIREMENTS:

APP P-105324:

All required monitoring was performed and the Self Monitoring Report Forms were submitted to ADEQ. The data does demonstrate compliance with all discharge monitoring and Aquifer Quality Limits. Some anomalies were noted on the reports generated for the period 1 February 2010 through 1 February 2011:

1. The "4 of 7" data base programming error. The error is being worked on by ADEQ IT staff.
2. For QTR2 CY2010 a Discharge Level Exceedance was reported at 2.001 and 2.158 with a limit of 2.0. Operators mistakenly recorded and reported levels which happened during cleaning cycles.

AZPDES AZ0025445:

All required monitoring was performed and the required Discharge Monitoring Reports (DMR) were submitted to ADEQ. Note that according to operators the facility has never discharged under this permit.

COMPLIANCE SCHEDULE:

The facility Compliance Schedule in the APP permit has multiple items as follows:

Description/activities for	Deadline	Status
Status Reports	Annual	Compliance
Wastewater Reclamation Plant – Phased Construction	Within x days of startup	N/A; construction not started yet.
POC Monitoring Well	After up gradient well	Completed in 2008.
Up gradient Monitoring Well	Various	Data submitted; ADEQ still evaluating the submittal.
POC Locations and Groundwater Flow Direction Evaluation	Annual	N/A; POC well not installed yet.
Direct Aquifer Injection Recharge Wells	Depending on time and/or flows	N/A; not discharging directly to aquifer.
Vadose Zone Recharge Wells	Various	Some completed 5 Dec 2008; The APP and Reuse Unit has requested sufficient technical information to evaluate the disposal capacity of the vadose zone wells.
Subsurface Recharge Facility	Various	Completed 21 October 2008

RECOMMENDATIONS:

1. Consider performing an engineering analysis to discover if installing a Sodium hydroxide scrubber in front of and in series with the carbon scrubber would help reduce the potential for odors travelling beyond the setback distance (as happened with odor complaint #C7595)
2. Survey the headworks building to determine why there is no negative pressure at the personnel door and if needed perform repairs or modifications to provide better building structural and air-tight integrity.
3. Rework the approaches to the headworks bar screening process. The approaches presently can risk operator safety because of an unstable ladder on one side and risk of head injury or fall on the other side. Additional lighting in the building would also decrease operator risks and increase operator maintenance efficiency.
4. Eliminate the large gap at the bottom of the corner of the fence at the lift station to provide site security.
5. Update the phone listings in the Emergency Plans and provide a mechanism to post changes and create periodic reissues of the documents.

105324 Johnson Utilities Pecan WRP
9 March 2011

COMPLIANCE SUMMARY:

Monitoring and Reporting Requirements. The system does provide the required information in a timely manner as stated in the permit.

Rating: Compliance.

Compliance Schedule. The system meets, has met, the requirements listed in the Compliance Schedule. Some items are not yet complete by virtue of timing. The ADEQ "APP and Reuse Unit" has requested sufficient technical information to evaluate the disposal capacity of the vadose zone wells.

Rating: Compliance.

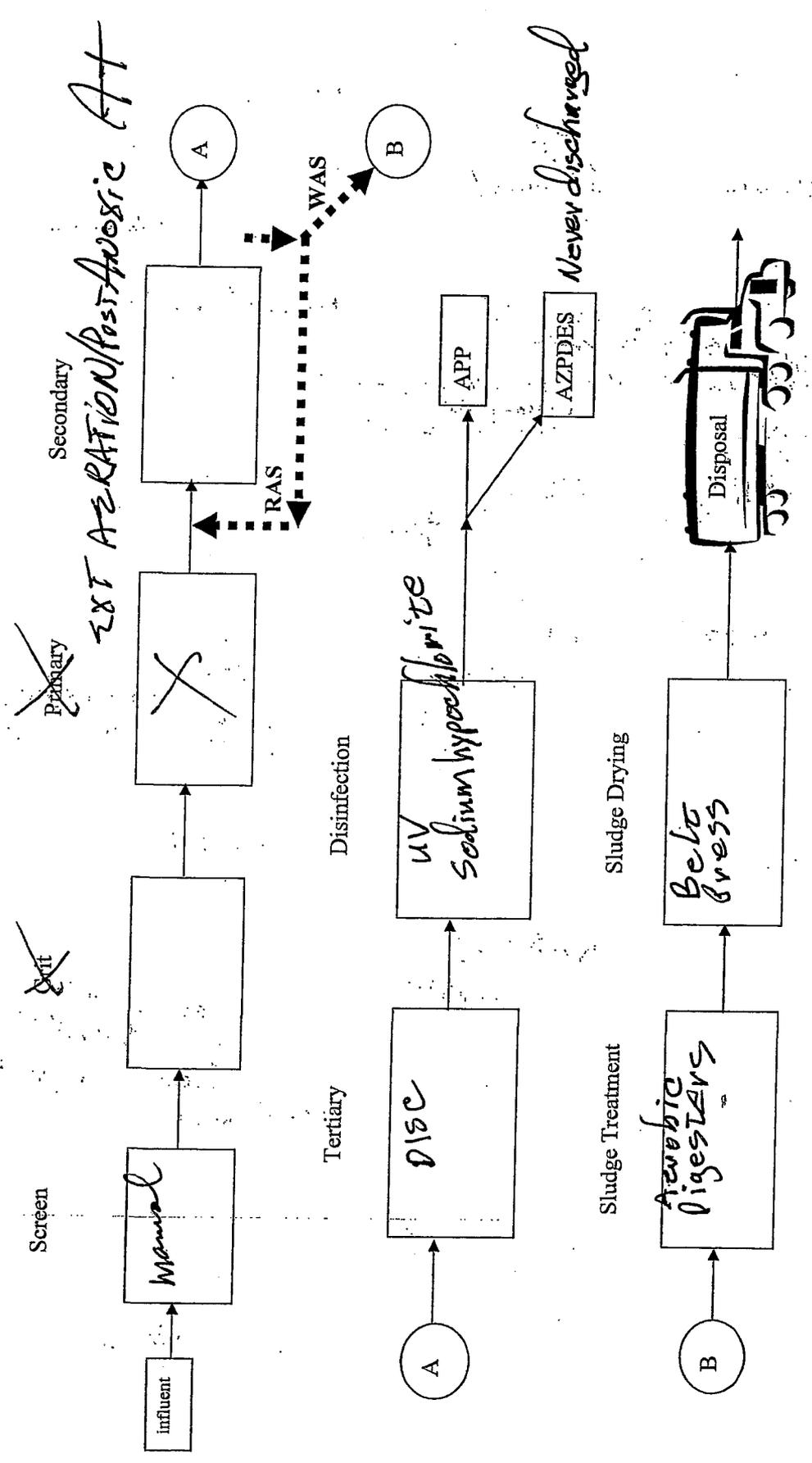
Operator Certification Requirements. According to the ADEQ operator database, Mr. Gregory Brown, Director of Engineering, is a Grade 4 Certified Operator in all 4 areas. His certifications expire on 28 February 2012

Rating: Compliance.

Operation & Maintenance (O&M) Requirements. The facility was in operation at the time of the inspection. All the required documentation was maintained. The plantsite and the collection system all appeared to be in good order with the exception of the headworks bar screen area as noted in the report. The facility was marginally in compliance with its O&M requirements.

Rating: Compliance.

END OF REPORT

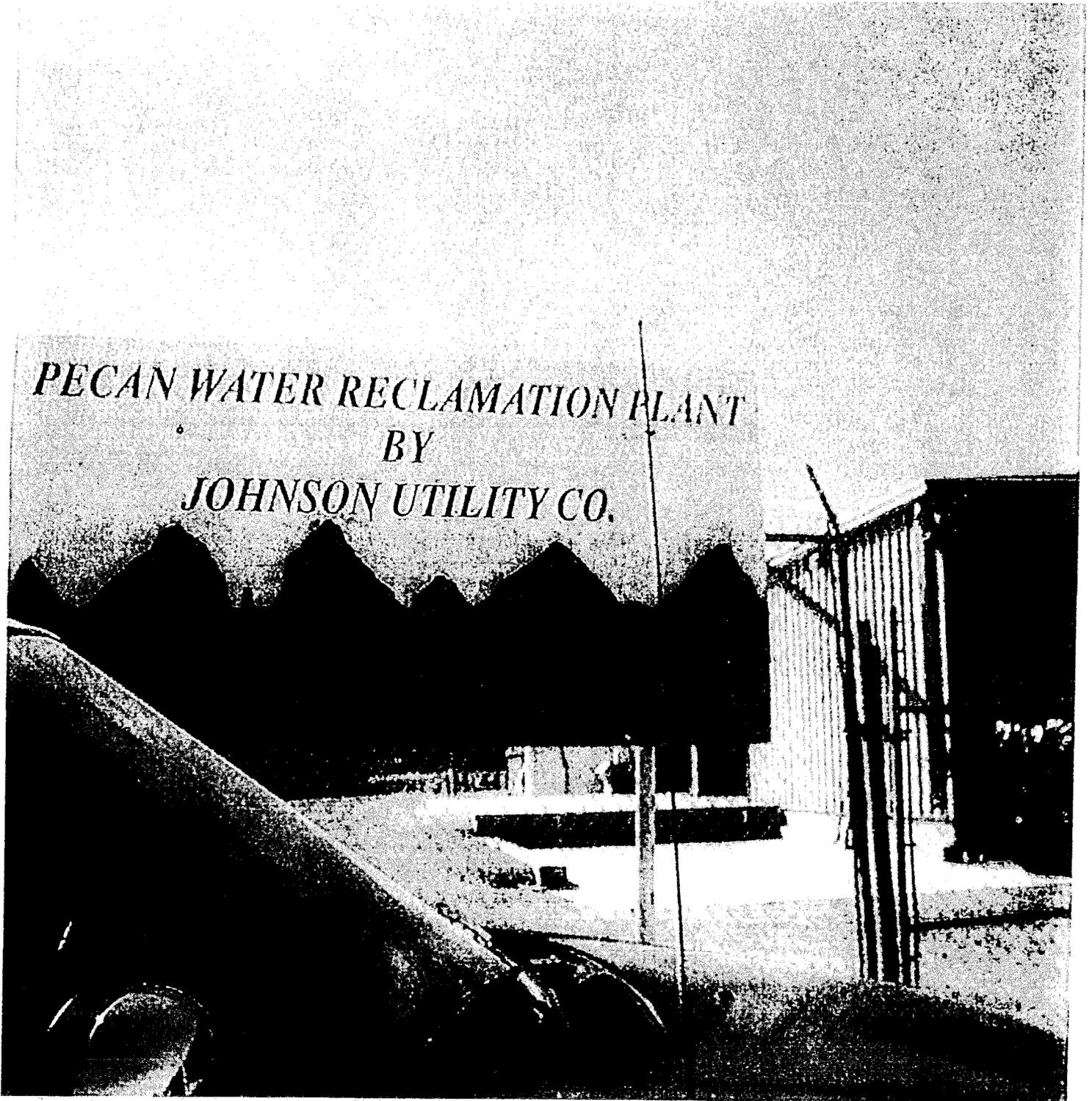


DWG: *ajz*@azdeq.gov

System Block Diagram for Pecan Water Reclamation Plant

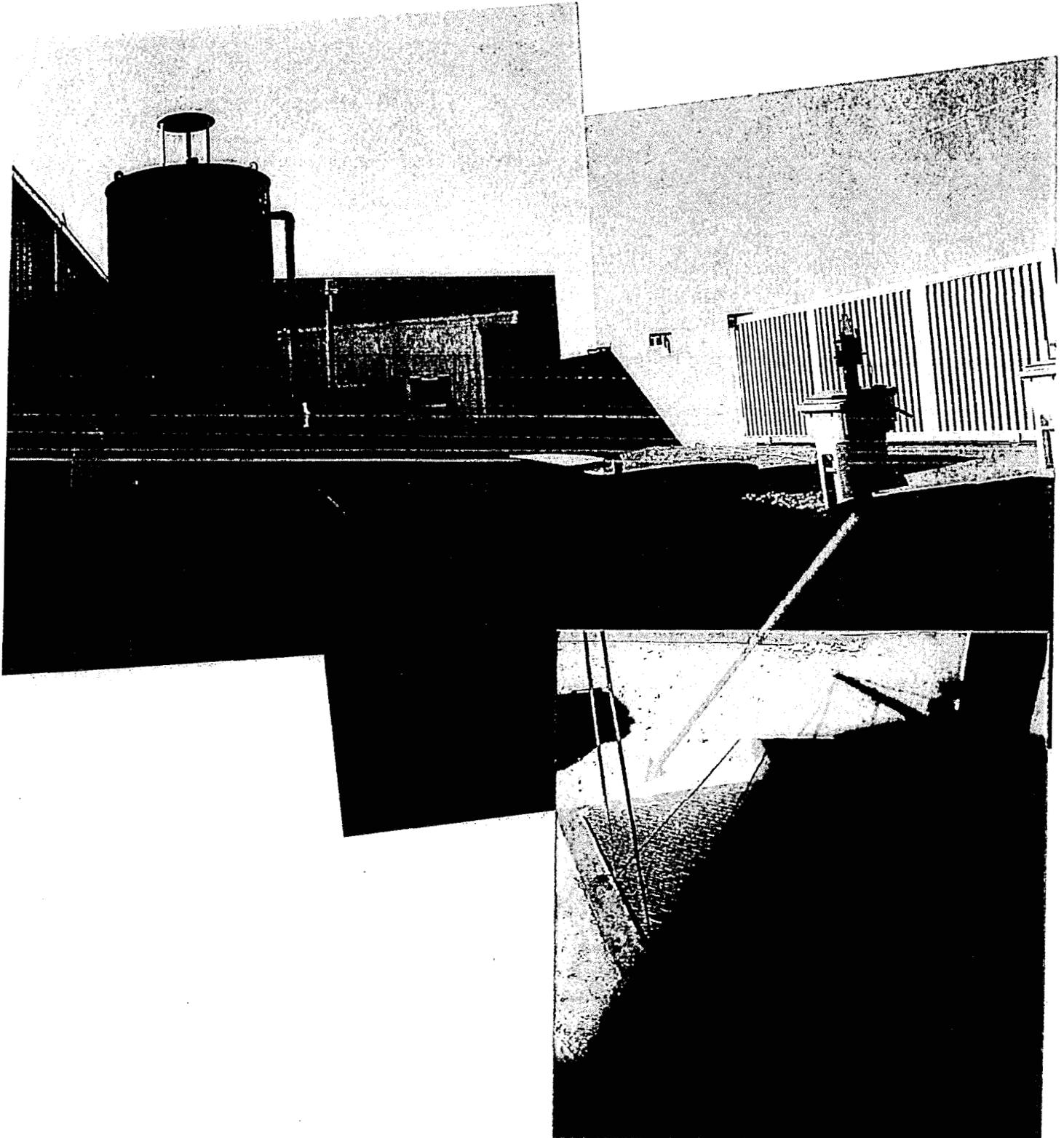
Inspection ID	170369; 170371	Place Name	Pecan WRP		
Date of image <small>Unless indicated otherwise</small>	16Feb11	Photographer <small>Unless indicated otherwise</small>	G. Frech	Place ID	18583
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Figure 1



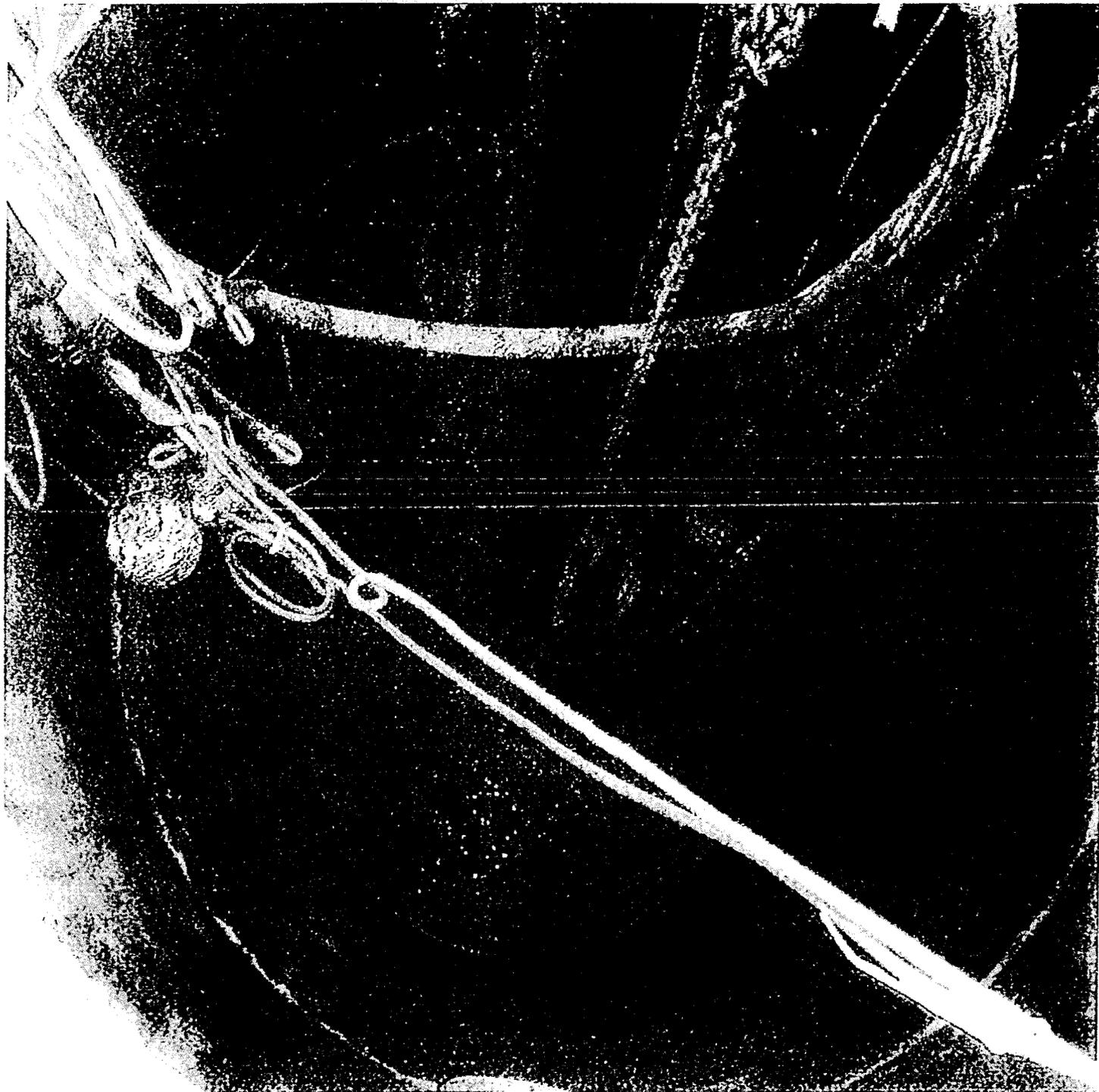
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Date of image <small>Unless indicated otherwise</small>	16Feb11	Photographer <small>Unless indicated otherwise</small>	G. Frech	Place ID	18583
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Figure 2 Composite of the influent lift/pump stations with adjacent carbon filter odor control. Inset shows cables propping open an odor source.



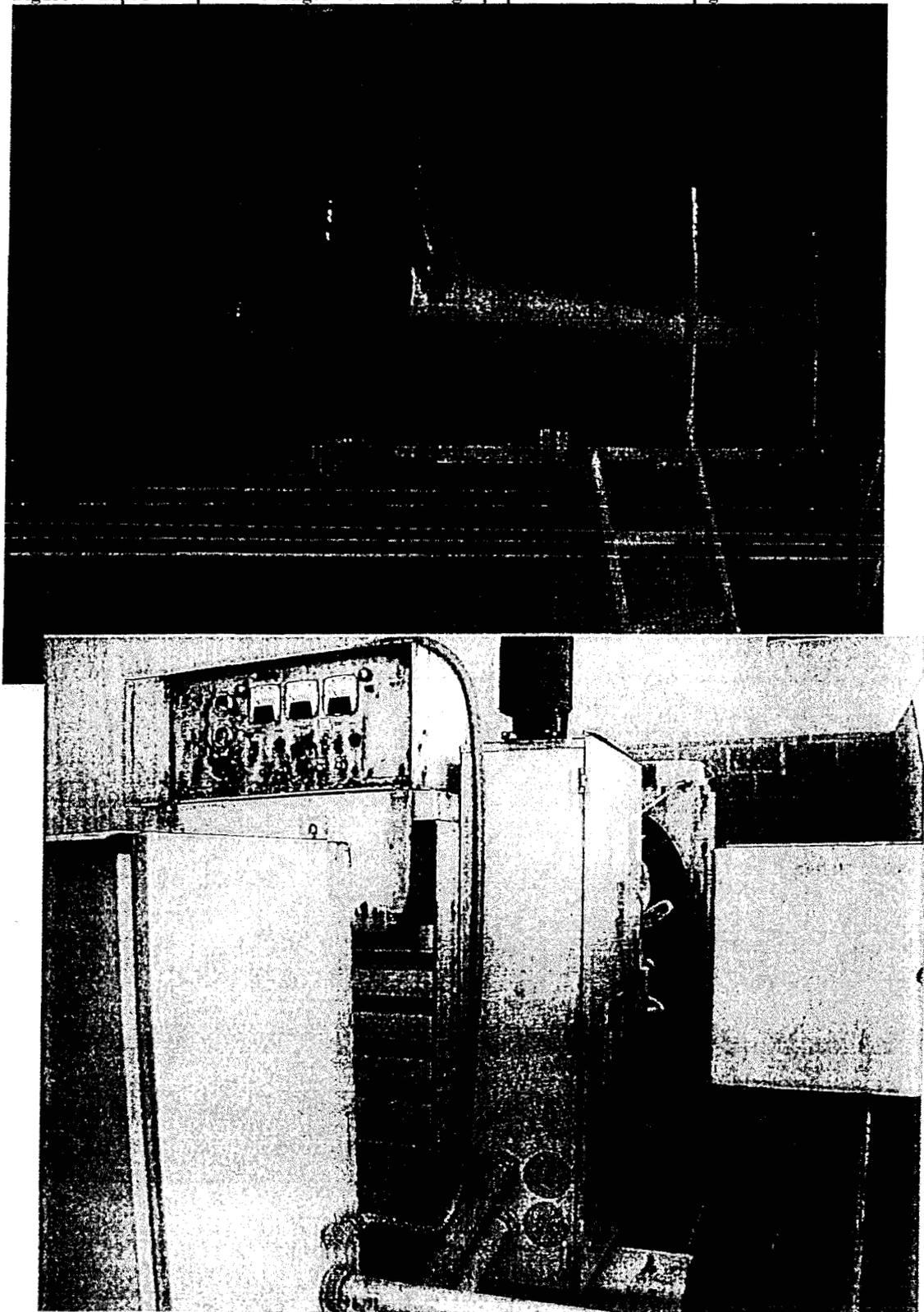
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Date of image <small>Unless indicated otherwise</small>	16Feb11	Photographer <small>Unless indicated otherwise</small>	G. Frech	Place ID	18583
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Figure 3 View inside the main lift station.



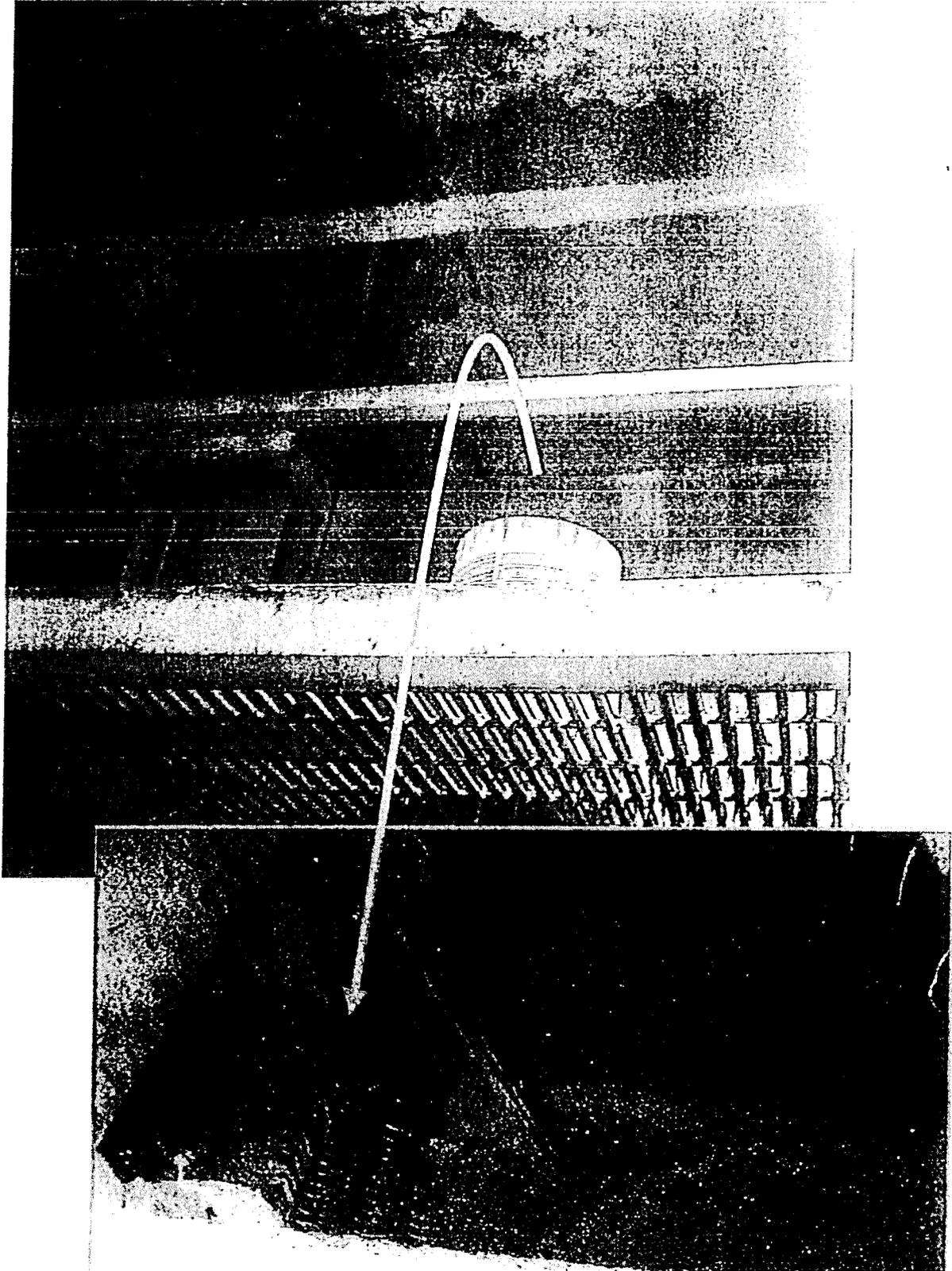
Inspection ID	170369; 170371	Place Name	Pecan WRP		
Date of image <i>Unless indicated otherwise</i>	16Feb11	Photographer <i>Unless indicated otherwise</i>	G. Frech	Place ID	18583
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Figure 4 Top: Non-op and no longer used screening equipment. Below: backup generator.



Inspection ID	170369; 170371	Place Name	Pecan WRP		
Date of image <small>Unless indicated otherwise</small>	16Feb11	Photographer <small>Unless indicated otherwise</small>	G. Frech	Place ID	18583
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Figure 5 Headworks step bar screen.



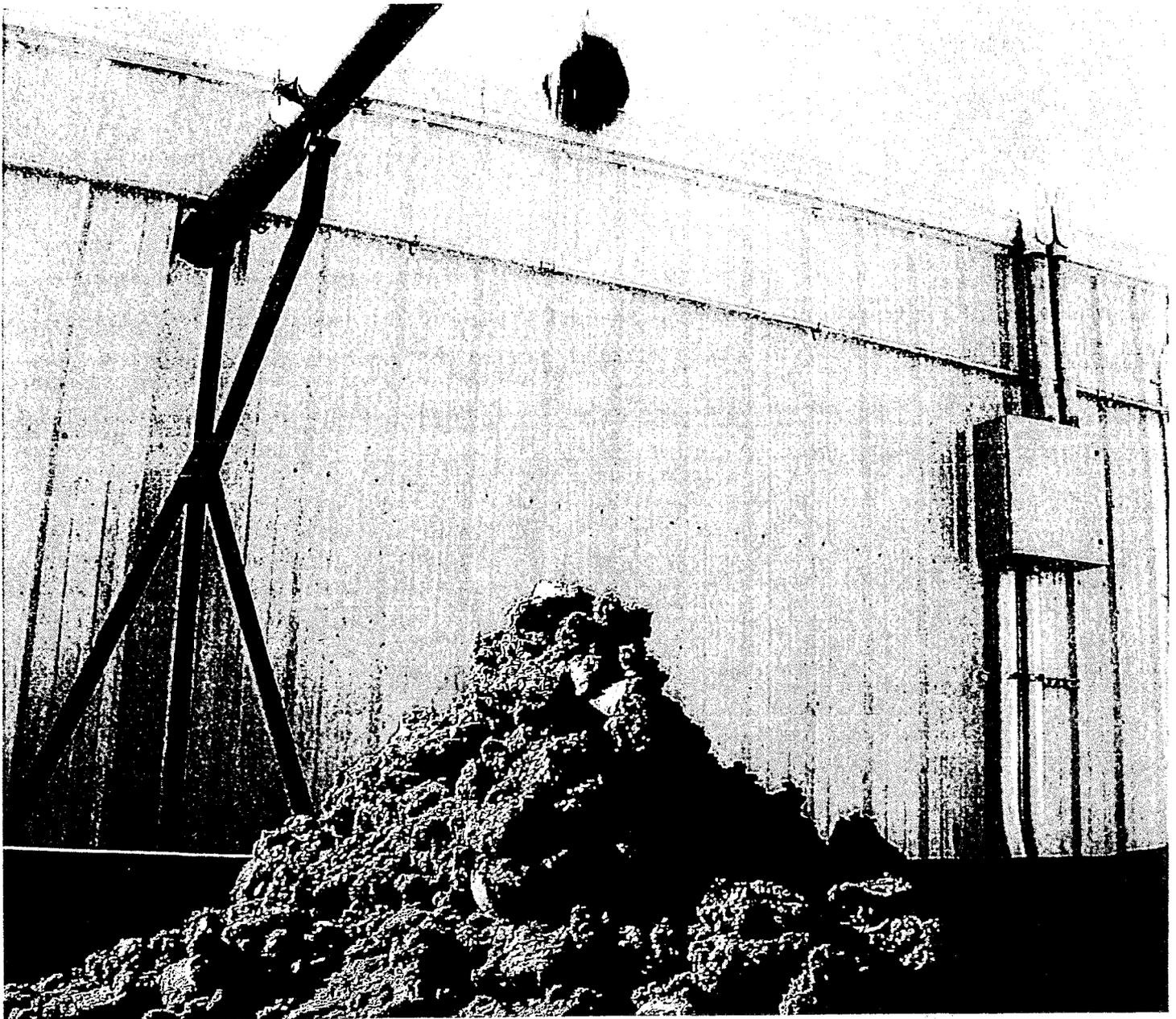
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Date of image <small>Unless indicated otherwise</small>	16Feb11	Photographer <small>Unless indicated otherwise</small>	G. Frech	Place ID	18583
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Figure 6 Disk filter chain drive



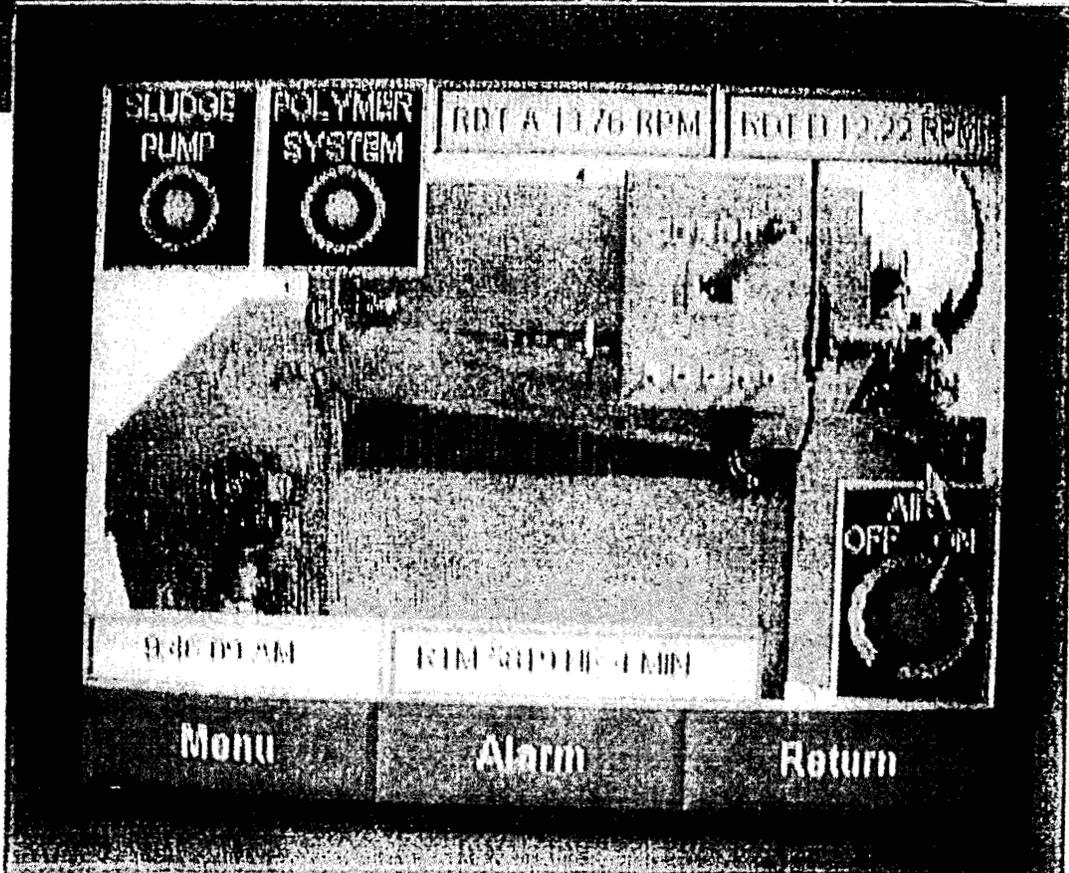
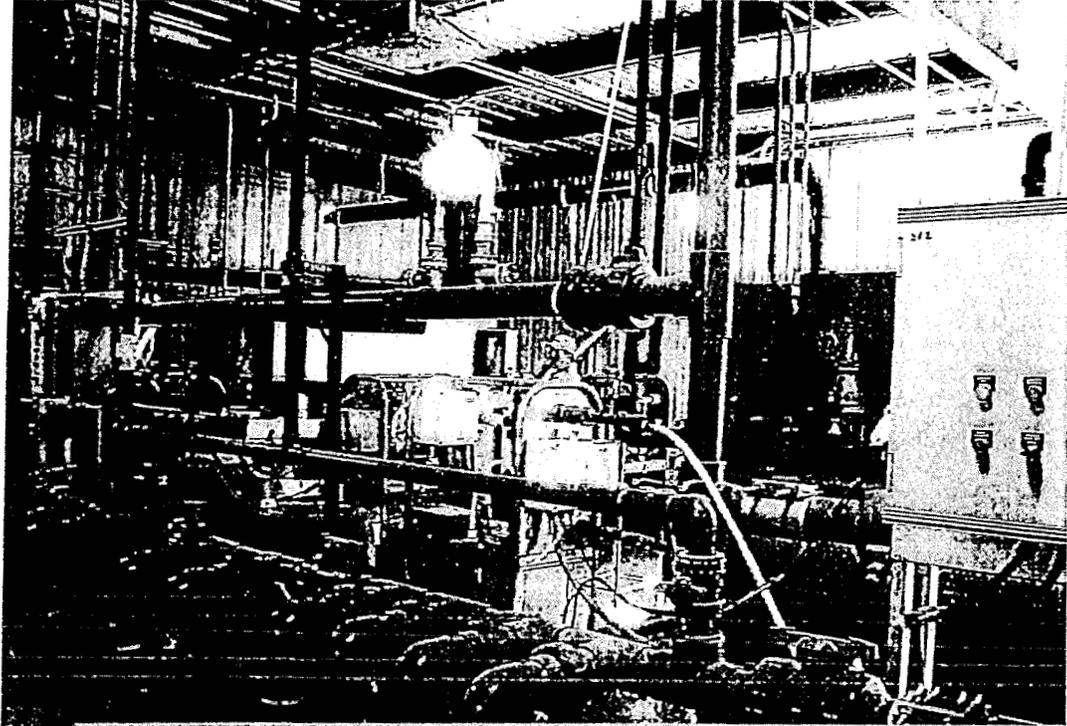
Inspection ID	170369; 170371	Place Name	Pecan WRP		
Date of image <small>Unless indicated otherwise</small>	16Feb11	Photographer <small>Unless indicated otherwise</small>	G. Frech	Place ID	18583
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Figure 7 Dried sludge dropping into disposal roll-off.



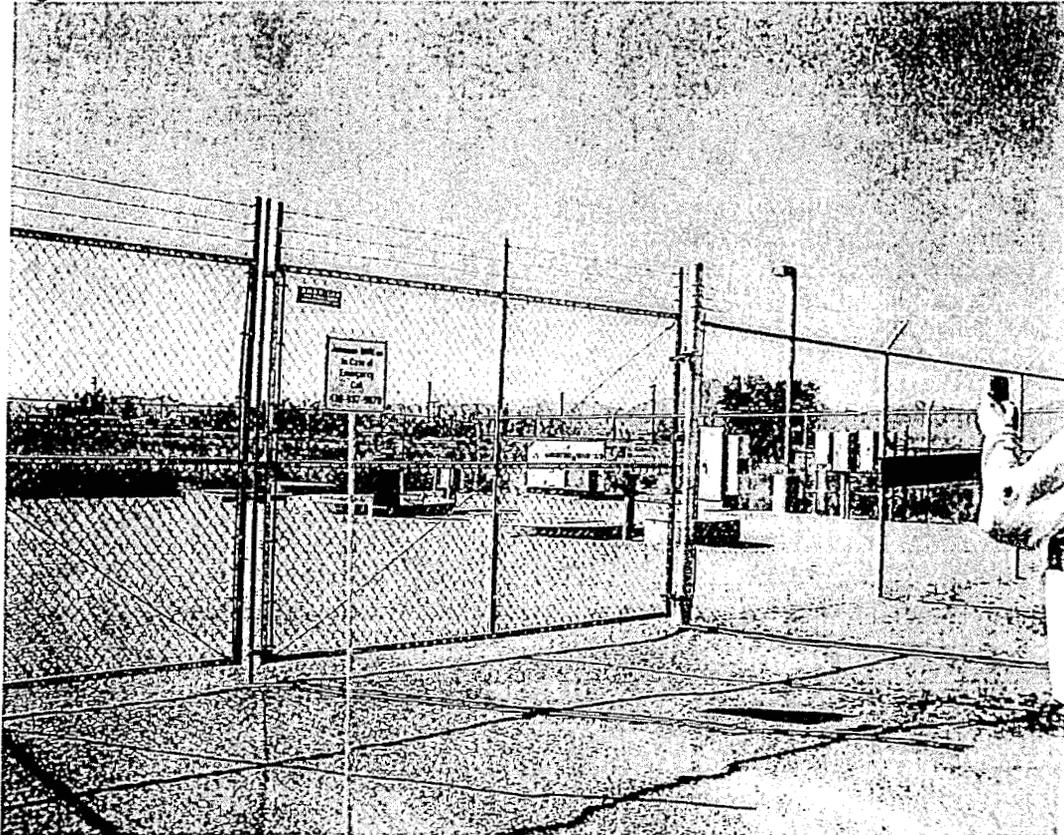
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Date of image <small>Unless indicated otherwise</small>	16Feb11	Photographer <small>Unless indicated otherwise</small>	G. Frech	Place ID	18583
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Figure 8 Belt press equipment with PLC/SCADA inset.



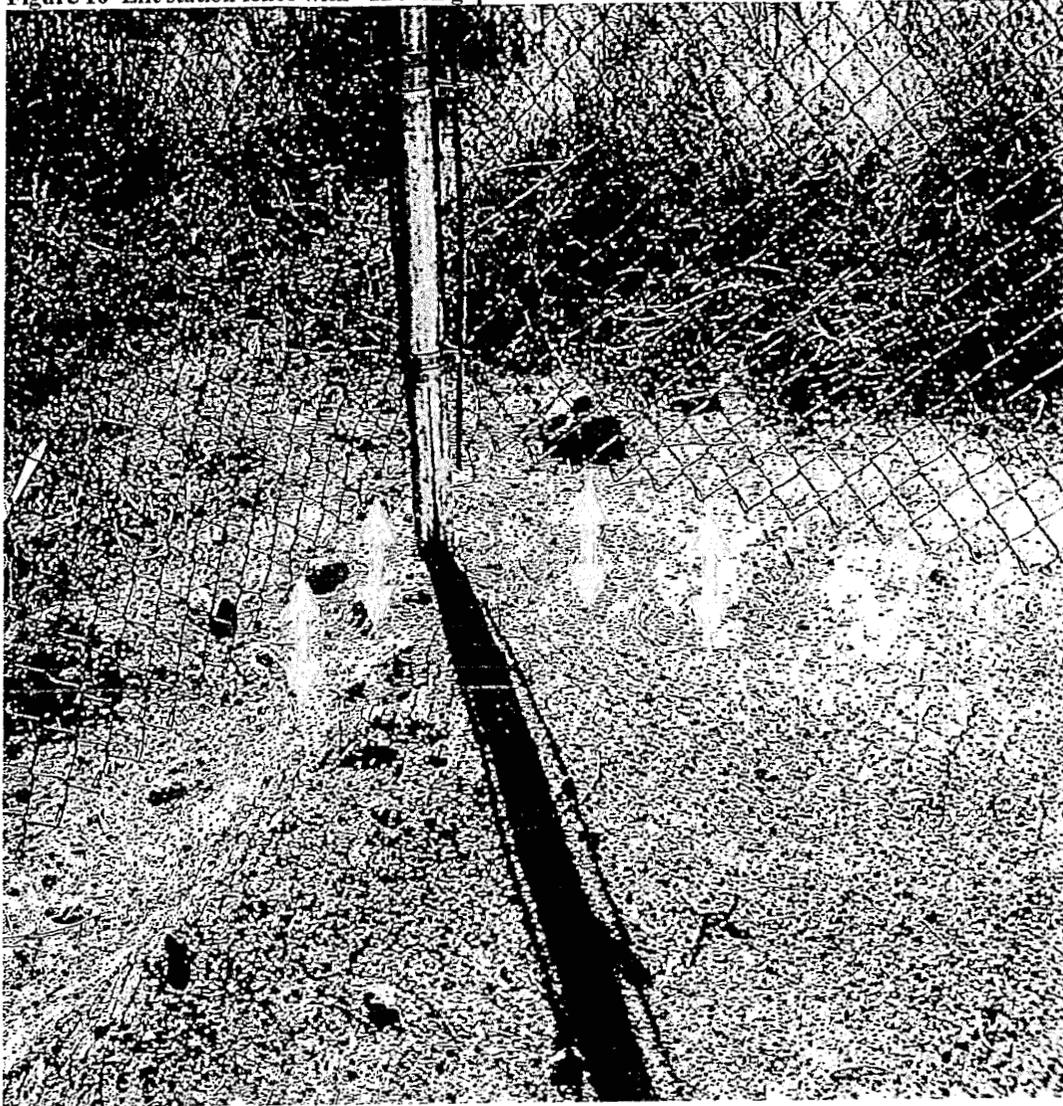
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Figure 9 Lift station



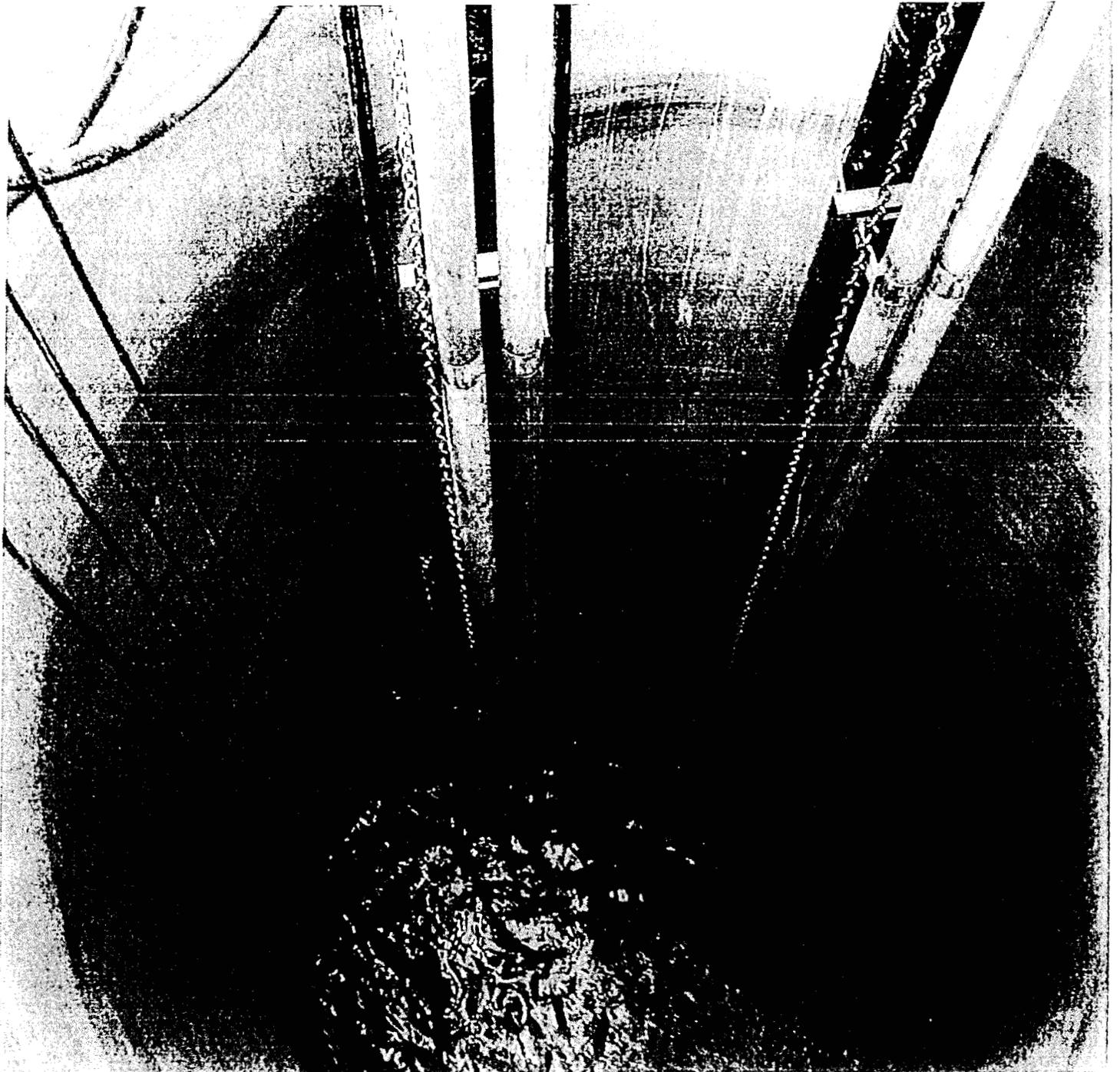
Inspection ID	170369; 170371	Place Name	Pecan WRP		
Date of image <small>Unless indicated otherwise</small>	16Feb11	Photographer <small>Unless indicated otherwise</small>	G. Frech	Place ID	18583
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Figure 10 Lift station fence with ~12 inch gap at bottom in corner.



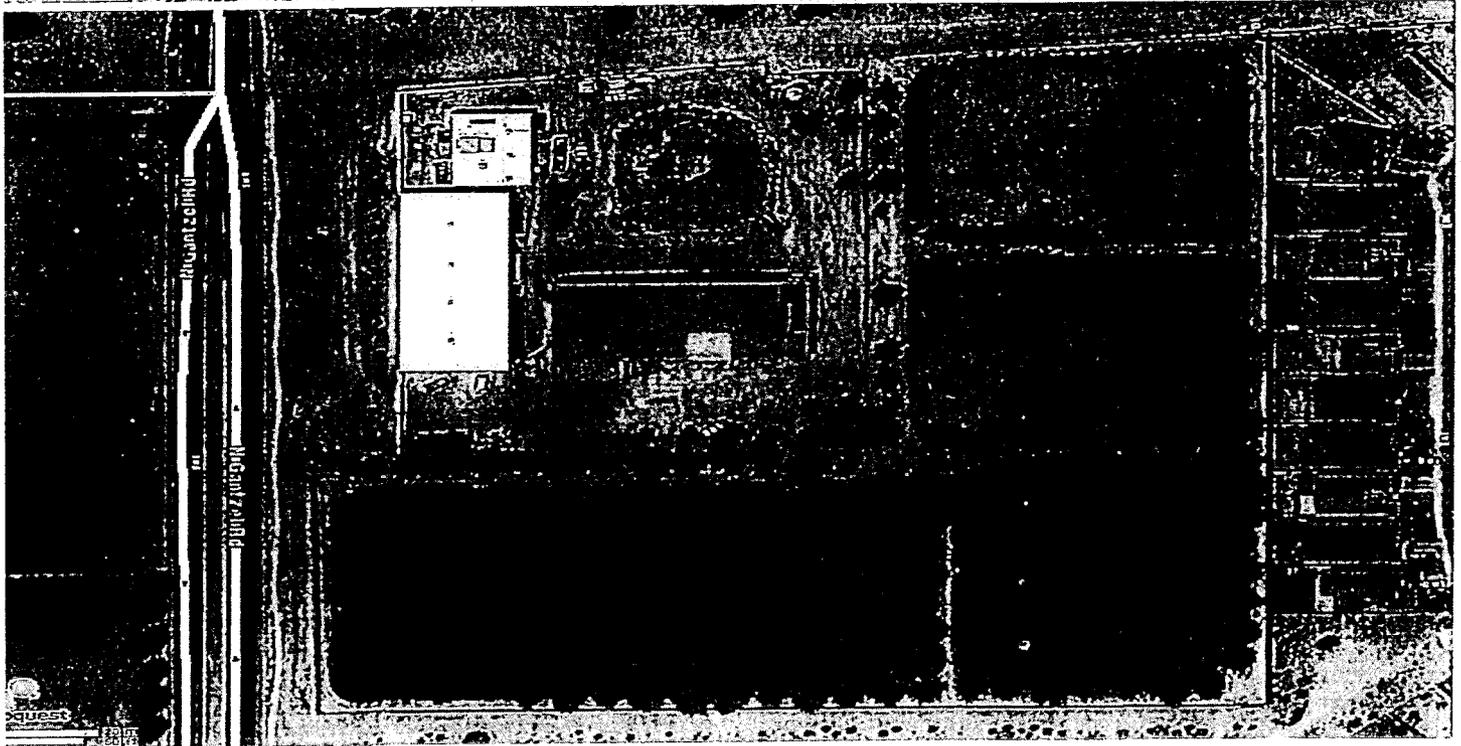
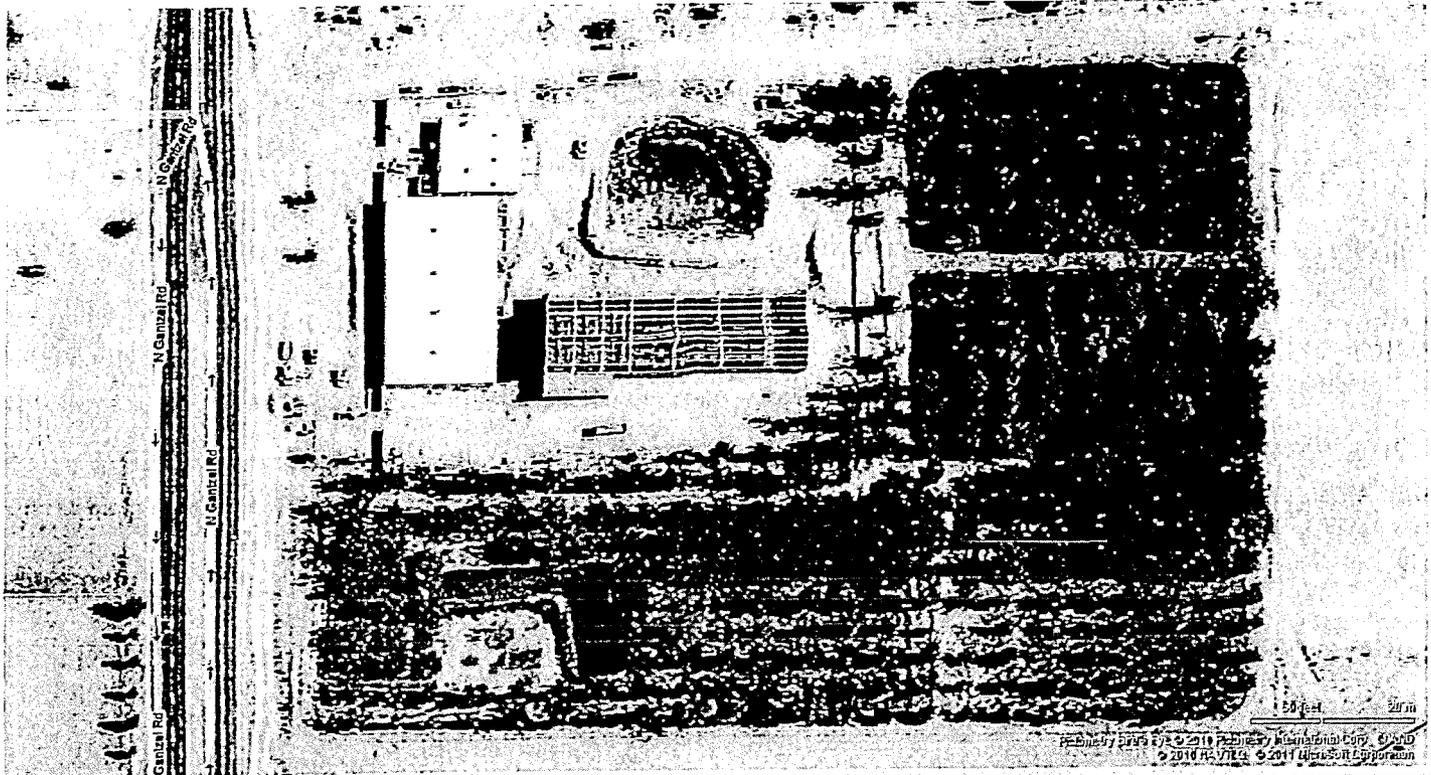
Inspection ID	170369; 170371	Place Name	Pecan WRP		
Date of image <small>Unless indicated otherwise</small>	16Feb11	Photographer <small>Unless indicated otherwise</small>	G. Frech	Place ID	18583
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Figure 12 View inside the lift station.



Inspection ID	170369; 170371	Place Name	Pecan WRP		
Date of image Unless indicated otherwise	16Feb11	Photographer Unless indicated otherwise	G. Frech	Place ID	18583
Page 13	Rev.1; 9Mar11	Inventory #	105324	AZPDES	AZ0025445

Figure 13 Top: Bing view (downloaded 2 March 2011) of the Pecan facility; Bottom: Mapquest view (downloaded 2 March 2011) of the Pecan facility.



Attachment 2

COMMISSIONERS
MIKE GLEASON - Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
KRISTIN K MAYES
GARY PIERCE



ARIZONA CORPORATION COMMISSION

06

August 1, 2008

CERTIFIED MAIL

ORIGINAL

Arizona Corporation Commission
DOCKETED

AUG - 1 2008

Mr. George Johnson
Manager / Authorized Representative
Johnson Utilities, L.L.C.
5230 East Shea Boulevard, Suite 200
Scottsdale, Arizona 85254

DOCKETED BY *mm*

RE: JOHNSON UTILITIES, L.L.C. - APPLICATION FOR A RATE INCREASE DOCKET NO.
WS-02987A-08-0180

LETTER OF SUFFICIENCY

Dear Mr. Johnson:

This letter (per section R14-2-103 B.7 of the Arizona Administrative Code) is to inform you that your application, originally received on March 31, 2008, and supplemented on May 15, 2008, and on July 3, 2008 has met the sufficiency requirements as outlined in Arizona Administrative Code R14-2-103. Your utility has been classified as Class A.

The Staff testimony regarding this application should be docketed on or about January 28, 2009 and a Commission decision should be rendered on or about July 25, 2009, barring any substantial amendments to the filing or extraordinary events. A Procedural Order will be issued by the Commission's Hearing Division shortly, which will more succinctly set the various filing and due dates regarding your application.

The Staff person assigned to your application is Jeffrey M. Michlik. He can be reached at (602) 364-2034, or toll free at (800) 222-7000, if you have any questions or concerns.

Sincerely,

Handwritten signature of Elijah Abinah in black ink.

Elijah Abinah
Assistant Director/Acting Chief Accountant
Regulatory Analysis Section
Utilities Division

EOA:JMM:tdp

CC: Docket Control Center (fifteen copies)
Lyn Farmer, Hearing Division
Vicki Wallace, Consumer Services
Delbert Smith, Engineering
Legal Division
Mr. Jeffrey W. Crockett, Snell & Wilmer, L.L.P.
Mr. Thomas Bourassa, CPA

DOCKET CONTROL
AZ CORP COMMISSION

2008 AUG - 11 A 11:43

RECEIVED