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BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN  
COMMISSIONER - CHAIRMAN  
RENZ D. JENNINGS  
COMMISSIONER  
CARL J. KUNASEK  
COMMISSIONER

IN THE MATTER OF THE APPLICATION OF ST. )  
DAVID WATER ASSOCIATION TO ISSUE )  
LONG TERM DEBT. )

DOCKET NO. W-02084A-97-0571  
DOCKET NO. W-02084A-98-0022

IN THE MATTER OF THE APPLICATION OF ST. )  
DAVID WATER ASSOCIATION FOR A )  
PERMANENT RATE INCREASE. )

DECISION NO. 60973  
**ORDER** Arizona Corporation Commission  
**DOCKETED**

Open Meeting  
June 17 and 18, 1998  
Phoenix, Arizona

JUN 19 1998

**BY THE COMMISSION:**

DOCKETED BY *juel*

On October 10, 1997, St. David Water Association ("SDWA" or "Applicant") filed with the Arizona Corporation Commission ("Commission") an application to issue long term debt. On January 20, 1998, SDWA filed an application for an increase in its permanent rates.

On January 26, 1998, the Commission's Utilities Division Staff ("Staff") filed a Motion to Consolidate the above-captioned proceedings. Our February 6, 1998 Procedural Order consolidated the above matters. On February 12, 1998, SDWA filed an amendment to its financing application. SDWA also amended the rate application on February 26, 1998, to request authorization for an off-site hookup fee. On April 24, 1998, Staff filed a Staff Report, recommending that the financing request and an alternative rate schedule be approved without a hearing.

**DISCUSSION**

SDWA is a water users association organized in 1969 to provide water in the town of St. David, which is located on Highway 80, approximately seven miles southeast of Benson, Cochise County, Arizona. SDWA provides water utility service to approximately 388 customers in the St. David area. SDWA's current rates were authorized in Decision No. 50562 (January 10, 1980).

During the test year ended December 31, 1996 ("TY"), SDWA had an average of 362 customers served by 5/8 x 3/4 inch meters and 3/4 inch meters, 21 served by 1 inch meters, one served by a 1 1/2 inch

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1 meter, and four served by 2 inch meters. For the past five years, SDWA has experience an annual growth  
 2 rate of approximately twenty customers. Mobile home parks and a subdivision are in the planning stages,  
 3 and Staff estimates that growth will continue at an annual rate of six percent or more.

4 Changes in facilities and staffing requirements present a need for Applicant to obtain financing  
 5 and a rate increase. According to Staff, ground subsidence will soon cause the loss of a water tank and  
 6 a well. Engineering studies estimate the cost to correct the situation and provide for known, planned  
 7 community growth to be \$559,930.

#### 8 **Financing Application**

9 SDWA's original financing application requested authorization for \$352,645 of long-term debt  
 10 from the Water Infrastructure Finance Authority of Arizona ("WIFA") to install a 500,000 gallon storage  
 11 tank and supporting infrastructure. The amended financing application requested authorization for  
 12 \$559,930 in long-term debt to provide for an elevated 200,000 gallon storage tank, replacement of  
 13 undersized water mains with 8 inch pipe, and the drilling and development of an additional well. The  
 14 new well will pump directly to the elevated storage tank. The well suffering the subsidence and a 40,000  
 15 gallon storage tank, booster pumps and pressure tank, will be abandoned.

16 Applicant submitted for Commission approval three alternative financing scenarios. The first  
 17 scenario is a \$560,000 loan from the Rural Utility Services ("RUS") at an interest rate between 4.50 and  
 18 5.50 percent for 40 years. The second scenario is a \$280,000 loan from RUS and a \$280,000 Colonia  
 19 grant. The third scenario is a \$140,000 loan from RUS, a \$280,000 Colonia grant and a \$140,000 WIFA  
 20 loan for 20 years at a rate of between 75 and 85 percent of the prevailing Prime Rate. The Prime Rate  
 21 is currently 8.5 percent.

22 Staff determined that the proposed improvements are needed and appropriate, and the estimated  
 23 cost is reasonable. Staff estimated the annual debt service cost of each scenario to be \$34,660; \$17,330;  
 24 and \$22,440, respectively. Staff assumed that SDWA would be able to obtain the third proposed  
 25 financing scenario in its determination of recommended rates. Staff stated that SDWA would not be able  
 26 to afford the first scenario, and the second scenario would be less costly than the third.

27 We will authorize either the second or third long-term debt scenario.  
 28 ...

1 **Rate Application**

2 Applicant proposed an original cost rate base ("OCRB") of \$334,487. Staff recommended  
3 adjustments which resulted in a net reduction of \$4,256, to \$330,231. Staff reduced operating revenues  
4 \$6,198, from Applicant's proposed \$85,131 to Staff's recommended \$78,933, which included the  
5 reclassification of \$4,888 in contributions and \$1,930 in deposits to liability accounts. Staff increased  
6 operating expenses \$9,115, from Applicant's proposed \$91,055 to \$100,170, which included an increase  
7 of \$20,190 in salaries and wages due to a reorganization caused by the departure of personnel; removal  
8 from outside services and capitalization of \$5,320 for backhoe charges associated with new pipeline  
9 work; and removal from office supplies and capitalization of a \$4,570 water billing program.

10 Applicant proposed the continuation of its existing rate design, which provides for separate  
11 residential and commercial usage charges, and varies the amount of commodity included based upon a  
12 meter's size and residential or commercial usage. Staff proposed usage charges based upon meter size,  
13 and include the same commodity amount for all meters. Applicant requested a revenue level of  
14 \$161,406, but according to Staff, Applicant's proposed rate design would yield \$129,085 in operating  
15 revenue, for an 8.76 percent rate of return on original cost rate base ("OCRB"). Staff's rate design would  
16 yield \$140,719 in operating revenue, for a 12.28 percent rate of return on OCRB.

17 We will adopt Staff's rate design. We agree that usage charges should be based upon meter size,  
18 without consideration whether meters are commercial or residential. We also agree that a significant  
19 increase is warranted, especially with the financing approved herein. We adopt Staff's recommendation  
20 to make interim the portion of the rate increase equivalent to the new debt service, subject to refund if  
21 work is not completed within eighteen months of this Decision.

22 \* \* \* \* \*

23 Having considered the entire record herein and being fully advised in the premises, the  
24 Commission finds, concludes, and orders that:

25 **FINDINGS OF FACT**

- 26 1. Applicant is a water users association which is an Arizona corporation engaged in  
27 providing water utility service in the town of St. David, Cochise County, Arizona.  
28 2. On October 10, 1997, Applicant filed a request for approval of financing in the amount

1 of \$352,645.

2 3. On December 17, 1997, Applicant submitted an application to the Commission requesting  
3 authorization to increase its rates and charges for water service.

4 4. The rate application was determined to be sufficient on January 20, 1998.

5 5. On February 12, 1998, SDWA filed an amendment to the financing application, to request  
6 approval of financing in the total amount of \$559,930.

7 6. On February 26, 1998, SDWA filed an amendment to the rate application, to request  
8 authorization for an off-site hookup fee.

9 7. On February 26, 1998, the above matters were consolidated for consideration by the  
10 Commission.

11 8. Notice of the applications was provided in accordance with the law.

12 9. On April 24, 1998, Staff filed a Staff Report regarding the above matters. Staff  
13 recommended, among other items, that the Commission approve rates which were higher than those  
14 proposed by Applicant.

15 10. Applicant provided notice to its customers of Staff's recommended rates on May 6, 1998,  
16 and filed verification of notification on May 12, 1998.

17 11. No response to either notification has been received by the Commission.

18 12. Applicant is in substantial compliance with the requirements of the Arizona Department  
19 of Environmental Quality ("ADEQ"), as ADEQ identified some missing 1996 test results, which have  
20 since been completed. ADEQ indicated that Applicant is providing water which currently has no  
21 maximum contaminant level violations and meets the water quality standards of the Safe Drinking Water  
22 Act.

23 13. Applicant's amended financing application requested approval of \$559,930 in financing.  
24 Applicant presented three scenarios for the long-term debt: a \$560,000 loan from RUS at an interest rate  
25 between 4.50 and 5.50 percent for 40 years; a \$280,000 loan from RUS and a \$280,000 Colonia grant;  
26 or a \$140,000 loan from RUS, a \$280,000 Colonia grant and a \$140,000 WIFA loan for 20 years at a rate  
27 of between 75 and 85 percent of the prevailing prime rate, which currently is 8.5 percent.

28 14. The purpose for the financing is for plant additions, including the installation of an

1 elevated 200,000 gallon storage tank, construction of a new well, and replacement of undersized water  
2 mains with 10,165 feet of 8 inch pipe, and supporting facilities.

3 15. Staff has reviewed the projects to be funded by the proceeds of the financing, as well as  
4 the construction costs, and found the proposed improvements are needed and appropriate, and the  
5 estimated cost is reasonable.

6 16. Staff has determined that Applicant would not be able to afford the first loan scenario, but  
7 would be able to afford the other two scenarios.

8 17. Staff recommended that the Commission approve up to \$280,000 in long-term debt from  
9 either WIFA or RUS, or a combination of the two. According to Staff, the WIFA loan should not be for  
10 a period of less than twenty years, and the interest rate should not exceed 85 percent of the prevailing  
11 Prime Rate at the time of issuance. Staff stated that the RUS loan should not be for a period of less than  
12 40 years, and the interest rate should not exceed 5.50 percent or the prevailing RUS rate at the time of  
13 issuance.

14 18. The effect of the proposed debt scenarios two and three on the Times Interest Earned Ratio  
15 ("TIER") and Debt Service Coverage ("DSC") ratio of Applicant, assuming Staff's recommended  
16 revenue requirement, would result in a TIER of 1.16 for either scenario and a DSC ratio of 1.44 and 1.33,  
17 respectively. The TIER would be below the preferred minimum level of 1.50, while the DSC ratio would  
18 be above the preferred minimum of 1.25. Staff stated that the DSC ratio indicated that Applicant's cash  
19 flow would be adequate to service the additional debt.

20 19. Applicant has separate residential and commercial rates and has proposed a similar rate  
21 structure in this matter. Staff's proposed rates do not discriminate between residential or commercial use,  
22 or vary commodity included in minimum based upon meter size. Staff stated that its proposed monthly  
23 usage charges are based upon demand for each meter size, with 5/8" x 3/4" meters and 3/4" meters at the  
24 same rate, since Applicant does not separately track those meter sizes.

25 20. The rates and charges for Applicant at present, as proposed in its rate application, and as  
26 recommended by Staff are as follows:

27 ...

28 ...

	Present Rates	Proposed Rates	
		Company	Staff
1			
2			
3	<b>MONTHLY USAGE CHARGE - Residential:</b>		
4	5/8" x 3/4" Meter	\$8.00	\$13.60
	3/4" Meter	8.00	13.60
	1" Meter	8.00	17.20
5	1 1/2" Meter	8.00	0.00
	2" Meter	8.00	0.00
6	3" Meter	0.00	0.00
	4" Meter	0.00	0.00
7	6" Meter	0.00	0.00
8	<b>MONTHLY USAGE CHARGE - Commercial:</b>		
9	5/8" x 3/4" Meter	\$18.00	\$13.60
	3/4" Meter	18.00	13.60
10	1" Meter	30.00	17.20
	1 1/2" Meter	40.00	17.20
11	2" Meter	60.00	102.00
	3" Meter	0.00	0.00
12	4" Meter	0.00	0.00
	6" Meter	0.00	0.00
13			
14	<b>Gallons Included in Minimum - Residential:</b>		
	5/8" x 3/4" Meter	5,000	5,000
	3/4" Meter	5,000	5,000
15	1" Meter	5,000	10,000
	1 1/2" or Larger Meter	--	--
16			
17	<b>Gallons Included in Minimum - Commercial:</b>		
	5/8" x 3/4" Meter	10,000	5,000
	3/4" Meter	10,000	5,000
18	1" Meter	15,000	10,000
	1 1/2" Meter	20,000	10,000
19	2" Meter	30,000	20,000
	4" or Larger Meter	--	--
20			
21	<b>Excess of Minimum - Residential and Commercial:</b>		
	Per 1,000 gallons	\$0.80	\$1.36
22	<b>Hydrant Charges (In Lieu of Standpipe):</b>		
	Refundable Meter Deposit	\$0.00	\$575.00
23	Commodity Charge per 1,000 gallons	--	3.00
24	...		
25	...		
26	...		
27	...		
28	...		

**SERVICE LINE AND METER INSTALLATION CHARGES:**  
 (Refundable pursuant to A.A.C. R14-2-405)

5/8" x 3/4" Meter	\$100.00	NONE	\$125.00
3/4" Meter	120.00	150.00	150.00
1" Meter	160.00	200.00	200.00
1 1/2" Meter	300.00	300.00	300.00
2" Meter	400.00	400.00	400.00
4" Meter	0.00	0.00	Cost
6" Meter and Larger	*	*	*

**SERVICE CHARGES:**

Establishment (Membership Fee)	\$0.00	\$0.00	\$15.00
Establishment (After Hours)	0.00	10.00	30.00
Reconnection (Delinquent)	5.00	10.00	15.00
Meter Test (If Correct), plus testing cost	0.00	10.00	10.00
Deposit	**	**	**
Deposit Interest	**	**	**
Reestablishment			
(Within 12 Months)	25.00	***	***
NSF Check	0.00	15.00	15.00
Deferred Payment	0.00%	0.00%	0.00%
Meter Reread (If Correct)	2.50	2.50	5.00
Late Payment Penalty	1.50%	1.50%	1.50%

**Monthly Service Charge for Fire Sprinkler:**

4" or Smaller	\$5.00	\$5.00	****
6"	5.00	5.00	****
8"	5.00	5.00	****
10"	5.00	5.00	****
Larger than 10"	5.00	5.00	****

\* Cost as approved by Commission Engineering Staff  
 \*\* Per Commission Rule A.A.C. R14-2-403.B.  
 \*\*\* Months off system times the monthly minimum per  
 Commission Rule A.A.C. R14-2-403.D.  
 \*\*\*\* 1% of Monthly Minimum for a Comparable Sized Meter  
 Connection, but not less than \$5.00 per month. The Service  
 Charge for Fire Sprinklers is applicable for service lines separate  
 and distinct from the primary water service line.

21. Applicant's Fair Value Rate Base ("FVRB") is determined to be \$330,231, which is the same as its OCRB.

22. The present rates and charges of Applicant produced revenues of \$78,933 and adjusted operating expenses of \$100,170, resulting in an operating income of (\$21,237), for no rate of return on FVRB.

23. The average and median monthly usage during the TY for customers serviced by 5/8" x 3/4" meters and 3/4" meters was 13,606 gallons and 9,035 gallons, respectively.

1           24.     The rates and charges Applicant proposed would produce operating revenues of \$129,085  
2 and adjusted operating expenses of \$100,170, resulting in an operating income of \$28,915, for an 8.76  
3 percent rate of return on FVRB.

4           25.     The rates and charges Staff proposed would produce operating revenues of \$140,719 and  
5 operating expenses of \$100,170, resulting in a net operating income of \$40,549, for a 12.28 percent rate  
6 of return on FVRB.

7           26.     Applicant's proposed rate schedule would increase the average monthly customer bill by  
8 70.0 percent, from \$14.88 to \$25.30, and the median monthly customer bill by 70.0 percent, from \$11.23  
9 to \$19.09.

10          27.     Staff's proposed rate schedule would increase the average monthly customer bill by 89.6  
11 percent, from \$14.88 to \$28.21, and the median monthly customer bill by 96.7 percent, from \$11.23 to  
12 \$22.09.

13          28.     In addition to the above rates and charges, Staff recommended that:

14           (a)     Applicant should collect from its customers their proportionate share of any  
15 Privilege, Sales or Use Tax as provided for in A.A.C. R14-2-409.D;

16           (b)     the proposed financing application consolidated with the rate case be approved  
17 without a hearing, but that \$22,440 per year of Staff's proposed increase be made interim,  
subject to refund if work is not completed and approved by Commission Staff  
Engineering within eighteen months of the effective date of this decision;

18           (c)     Applicant be ordered to place \$1,870 per month in a trust account for the purpose  
19 of funding a potential refund, to be released only when Commission Staff Engineering  
approval is obtained, or to make refunds as directed by the Commission;

20           (d)     the off-site facilities hook-up fee tariff be approved without a hearing;

21           (e)     SDWA be ordered to file a rate review based on a 1999 test year; and

22           (f)     since SDWA has not proposed specific rules and regulations, it be ordered to  
23 operate under Commission Rules and Regulations contained in A.A.C. Title 14, Chapter  
2.

24          29.     Staff recommended that SDWA file copies of all executed financing documents setting  
25 forth the terms of the financing with the Director of the Utilities Division within thirty days of obtaining  
26 such financing.

27     ...

28     ...

30. The following are Applicant's proposed and Staff's recommended hook-up fees:

	Applicant Proposed	Staff Recommended
5/8" x 3/4" Meter	\$ 530	\$ 200
3/4" Meter	620	240
1" Meter	1,000	400
1 1/2" Meter	1,550	800
2" Meter	2,175	1,280
3" Meter	--	2,400
4" Meter	--	4,000
6" or Larger Meter	--	8,000

31. Staff recommended that the hook-up fee should be applied pursuant to a main extension agreement. Staff provided recommended terms and conditions in a sample tariff.

32. Staff recommended that SDWA submit an annual report every July 15th to the Utilities Division Director, with the following information:

- (a) name of each person/entity paying a hook-up fee;
- (b) amount of hook-up fee paid by each person/entity;
- (c) balance in hook-up fee account;
- (d) amount of interest earned on hook-up fee account;
- (e) amount spent from hook-up fee account; and
- (f) list of plant items purchased from hook-up fee account. If, as an alternative, the hook-up fees were used for the repayment of loans obtained for the installation of off-site facilities, then this should be indicated.

#### CONCLUSIONS OF LAW

1. Applicant is a public service corporation within the meaning of Article XV of the Arizona Constitution and A.R.S. §§ 40-251, 40-251, 40-301 and 40-302.

2. The Commission has jurisdiction over Applicant and the subject matter of the applications.

3. Notice of the applications was given in accordance with the law.

4. The rates and charges for water service proposed by Applicant are not just and reasonable.

5. The rates and charges authorized below are just and reasonable.

6. Staff's recommendations in Findings of Fact Nos. 17 and 28 through 32 should be adopted, as modified below.

7. The financing approved herein is for lawful purposes within Applicant's corporate powers, is compatible with the public interest, with sound financial practices, and with the proper performance by Applicant of service as a public service corporation, and will not impair Applicant's ability to perform that service.

8. The financing approved herein is for the purposes stated above, and is reasonably necessary for those purposes, and such purposes are not, wholly, or in part, reasonably chargeable to operating expenses or to income.

**ORDER**

IT IS THEREFORE ORDERED that St. David Water Company is hereby authorized to issue promissory notes in an amount not to exceed \$280,000, from either WIFA or the RUS, or a combination of the two. The interest rate on the WIFA loan should not exceed 85 percent of the prevailing Prime Rate at the time of issuance and should be for a minimum period of 20 years. The interest rate on the RUS loan should not exceed 5.50 percent or the prevailing RUS rate at the time of issuance, and should be for a minimum period of 40 years.

IT IS FURTHER ORDERED that St. David Water Company is hereby authorized to engage in any transactions and to execute any documents necessary to effectuate the authorization granted above.

IT IS FURTHER ORDERED that authority for the long-term debt shall be expressly contingent upon St. David Water Company's use of the proceeds for the purposes set forth in the amended financing application.

IT IS FURTHER ORDERED that approval of the financing set forth above does not constitute or imply approval or disapproval by the Commission of any particular expenditure of the proceeds derived thereby for the purposes of establishing just and reasonable rates.

IT IS FURTHER ORDERED that St. David Water Company shall be, and is hereby, authorized and directed to file on or before June 30, 1998, the following revised rate schedules setting forth the following rates and charges:

MONTHLY USAGE CHARGE - Residential and Commercial:

5/8" x 3/4" Meter	\$14.00
3/4" Meter	14.00
1" Meter	23.00
1 1/2" Meter	47.00
2" Meter	75.00
3" Meter	140.00
4" Meter	233.00
6" Meter	467.00

Gallons Included in Minimum - Residential and Commercial: 3,000

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1	Excess of minimum - Residential and Commercial:	
2	Per 1,000 gallons	\$1.34
3	Hydrant Charges (In Lieu of Standpipe):	
4	Refundable Meter Deposit	\$400.00
	Commodity Charge per 1,000 gallons	2.50

SERVICE LINE AND METER INSTALLATION CHARGES:  
(Refundable pursuant to A.A.C. R14-2-405)

6	5/8" x 3/4" Meter	\$125.00
7	3/4" Meter	150.00
	1" Meter	200.00
8	1 1/2" Meter	300.00
	2" Meter	400.00
9	3" Meter and Larger	*

SERVICE CHARGES:

11	Establishment (Membership Fee)	\$15.00
	Establishment (After Hours)	30.00
12	Reconnection (Delinquent)	15.00
	Meter Test (If Correct), plus testing cost	10.00
13	Deposit	**
	Deposit Interest	**
14	Reestablishment	
	(Within 12 Months)	***
15	NSF Check	15.00
	Meter Reread (If Correct)	5.00
16	Late Payment Penalty (Per Month)	1.50%

Monthly Service Charge for Fire Sprinkler:

17	4" or Smaller	****
18	6"	****
	8"	****
19	10"	****
	Larger than 10"	****

\* Cost as approved by Commission Engineering Staff  
 \*\* Per Commission Rule A.A.C. R14-2-403.B.  
 \*\*\* Months off system times the monthly minimum per  
 Commission Rule A.A.C. R14-2-403.D.  
 \*\*\*\* 1% of Monthly Minimum for a Comparable Sized Meter  
 Connection, but not less than \$5.00 per month. The Service  
 Charge for Fire Sprinklers is applicable for service lines separate  
 and distinct from the primary water service line.

1 IT IS FURTHER ORDERED that the request of St. David Water Company for an off-site services  
2 hook-up fee is hereby approved, with the following charges:

3	5/8" x 3/4" Meter	\$ 200
	3/4" Meter	240
4	1" Meter	400
	1 1/2" Meter	800
5	2" Meter	1,280
	3" Meter	2,400
6	4" Meter	4,000
7	6" or Larger Meter	8,000

8 IT IS FURTHER ORDERED that St. David Water Company shall comply with Staff's  
9 recommendations contained in Findings of Fact Nos. 31 and 32 regarding the hook-up fee.

10 IT IS FURTHER ORDERED that the above rates, charges and hook-up fee will be effective for  
11 all services provided on and after July 1, 1998.

12 IT IS FURTHER ORDERED that \$22,440 of annual revenues of St. David Water Company shall  
13 be considered interim, to be refunded to customers if the plant additions for which the financing approved  
14 above are not completed, as confirmed by Staff Engineering, within eighteen months from the effective  
15 date of the rate increase approved herein. If a refund is necessary, within thirty days from the expiration  
16 of the eighteen month period, Applicant shall submit for Staff approval a method for effectuating the  
17 refund and a revised rate design to reflect the reduced revenue requirement.

18 IT IS FURTHER ORDERED that St. David Water Company shall file copies of all executed  
19 financing documents setting forth the terms of the financing with the Director of the Utilities Division  
20 within thirty days of obtaining such financing.

21 IT IS FURTHER ORDERED that St. David Water Company shall place \$1,870 per month in a  
22 trust account for the purpose of funding a potential refund, to be released only when Commission Staff  
23 Engineering approval is obtained, or to make refunds as directed by the Commission.

24 IT IS FURTHER ORDERED that St. David Water Company shall notify its customers of the  
25 rates and charges authorized above and the effective date of same by means of a notice mailed to its  
26 customers with its next billing statement.

27 ...  
28 ...

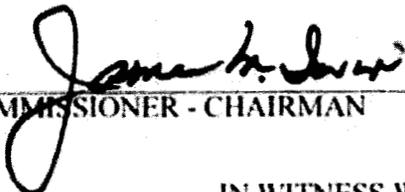
1 IT IS FURTHER ORDERED that in addition to the collection of St. David Water Company's  
2 regular rates and charges, it shall collect from its customers their proportionate share of any Privilege,  
3 Sales or Use Tax as provided for in A.A.C. R14-2-409.D.

4 IT IS FURTHER ORDERED that St. David Water Company shall file a rate review based on a  
5 1999 test year, with the rate review to be submitted to Commission Staff within nine months of the end  
6 of the test year.

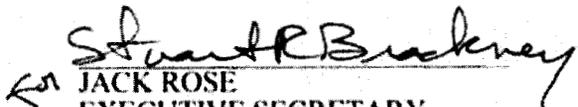
7 IT IS FURTHER ORDERED that St. David Water Company shall operate under Commission  
8 Rules and Regulations contained in A.A.C. Title 14, Chapter 2.

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

10 BY ORDER OF THE ARIZONA CORPORATION COMMISSION.

	
COMMISSIONER - CHAIRMAN	COMMISSIONER
	COMMISSIONER

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12  
13  
14 IN WITNESS WHEREOF, I, JACK ROSE, Executive Secretary of the Arizona  
15 Corporation Commission, have hereunto set my hand and caused the official seal  
16 of the Commission to be affixed at the Capitol, in the City of Phoenix, this  
17 19 day of June, 1998.

18   
19 for JACK ROSE  
20 EXECUTIVE SECRETARY

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DISSENT \_\_\_\_\_  
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SERVICE LIST FOR:

ST. DAVID WATER COMPANY

DOCKET NOS.:

W-02084A-97-0571 and W-02084A-98-0022

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