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**Liberty Utilities**

21 October 2013

Arizona Corporation Commission  
Attn: Steve Olea, Director  
Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007

REC-111  
AZ CORP COMMISSION  
DOCKET CONTROL

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Re: In the matter of the Commission's rulemaking to modify A.A.C. R14-2-103 to update the utility classifications  
Docket No. RU-00000A-13-0294

Dear Mr. Olea,

As you know Liberty Utilities owns eight public service corporations serving approximately 70,000 customers in Arizona that range in size from Class A to Class C based on the current annual operating revenues. We agree that it is a good idea to modify Rule 103 to revise the classifications from the current 1992 standards and provide for an annual inflation adjustment. It is Liberty Utilities perspective that ongoing reviews such as this can decrease rate case filing requirements which ultimately benefits all stakeholders.

Sincerely,

*Christopher D. Krygier 10/21/13*

Christopher D. Krygier  
Utility Rates and Regulatory Manager

Arizona Corporation Commission  
DOCKETED

OCT 21 2013

DOCKETED BY 