

ORIGINAL



Arizona Corporation Commission  
Public Comment Form

1200 W Washington St - Phx, AZ 85007  
(602) 542-4251

Step 1

This form should be used for public comments pertaining to a specific pending case only. Please be sure to reference the appropriate docket number so your comments are filed in the docket promptly. Please use this link for complaints, inquiries or general inquiries. <http://www.azcc.gov/Divisions/Utilities/forms/ComplaintForm2013.pdf>

Step 2

YOUR NAME <i>Francis McLeod</i>	DATE <i>1/30/14</i>
ADDRESS <i>335 W. Mary Patricia Dr.</i>	PHONE (HOME) <i>1-928-468-2106</i>
CITY, STATE, ZIP <i>Payson, AZ 85541</i>	CELL PHONE
DOCKET YOU WISH TO COMMENT ON: <i>Payson Water Co. consolidated dockets:</i>	DOCKET NUMBER <i>W-03514A-13-0111 &amp; W-03514A-13-0142</i>
CASE OR UTILITY NAME <i>Payson Water Company</i>	YOUR POSITION ON THE DOCKET (PRO, CON, OR OTHER)
E-MAIL ADDRESS <i>clappler@bluefrog.com</i>	

Step 3

ENTER YOUR COMMENTS HERE:

See comments on attached page(s).

Step 4

This form may be completed, printed, mailed or faxed to:

Arizona Corporation Commission  
Consumer Services Section  
1200 W. Washington St  
Phoenix, AZ 85007

or

E-mail your comments to:  
[mailmaster@azcc.gov](mailto:mailmaster@azcc.gov)

Fax to: 602-542-2129

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## Water Augmentation and Infrastructure Improvements

There is conflicting evidence to support the need for augmentation. Some records presented as evidence by PWC show water hauled to EVP (i.e. 74,000 gal June 2012) while other data presented more shows more water is pumped than delivered to EVP users. (5,923,000 gal pumped vs. 3,736,000 gal delivered to EVP. This 2,187,000 gal difference conveniently is explained as a "typo" or missing records. On the other hand, residents frequently observe loaded trucks leaving the area.

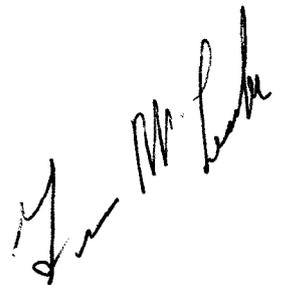
PWC is requesting estimated 2014 hauling surcharges of \$ 17.00 /mo. Under this request total cost to the 140 EVP users over a 5 month curtailment period will be \$ **11,900**. This is in addition to the over **proposed \$35,000** revenue increase from 140 typical 3,000 gal/mo typical EVP users.

Whatever the true total facts are, this issue would become moot by long promised modest infrastructure improvements. Hauling water is an ongoing ever increasing expense. Wells and other infrastructure are a modest investment with immediate return. Brook Utilities (Hardcastle EVP meeting March 2013) reported a 1.6% loss between gallons pumped and gallons delivered..... The delivery system is tight and free of major loss. This leaves us free to focus on increased supply.

Located in the base of a canyon, the EVP water table is stable and easily reached. Twenty (20) private wells are in use with typical depths ranging from 28 to 80 feet., reliably producing adequate year around flow rates . A new well was recently drilled at 723 Detroit Dr..... not all that far from the PWC tank. The cost for a 50 to 100 foot well cost is in the \$4,000 - \$10,000 range. This is a **one time investment** that is similar to or even less than one year of estimated \$11,900 trucking fees and is a small fraction of the \$35,000 to \$50,000 revenue increase PWC is seeking to obtain from EVP. ----

With 20 established private wells in the immediate area, all with stable water levels/supply, and no reports of "dry holes" the probability of a successful well is extremely high. The monthly production of a well producing a modest 5 gal/min is 216,000 gal/mo. which is 2.92 times the maximum 74,000 shortage reported in 2012.

Imposing **recurring** hauling charges **greater** than the **one time cost** adding a well to eliminate the reported shortage is **not reasonable or acceptable**. Authorization of hauling fees leaves no incentive for PWC to solve the problem, they will just continue in the tradition of Brook Utilities and KICK THE CAN DOWN THE ROAD at our expense. At the very least any **hauling fees** imposed on EVP need to be **preceded by long promised improvements**.



## Excessive Reconnection Fees and Procedures

Ideally the purpose of curtailment and reconnection fees is to encourage good stewardship of valued resources and to deter irresponsible excessive use that negatively impacts other users. Unfortunately the PWS proposal with excessive fees and arbitrary enforcement procedures is focused more on "fund raising" than stewardship.

As presented the PWC proposal, fees are excessive to the point of imposing serious hardship on a typical user, many of whom are on fixed incomes. A \$200 first offense is a lot of groceries. Carrying a violation forward to the next year is even more pointed, raising every violation a "second" or higher. — The carry forward clause inflates a first violation to as much as \$ 1,500.

The PWC proposal and examples given determines a violation based solely on the difference on meter readings taken on adjacent days. Meter reading times and reading days are at the sole arbitrary discretion of PWC. Implementing this policy as stated in the PWC filing and by way to their example:

Readings Late Sat PM  
Early Sun AM

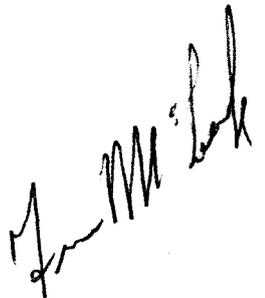
The difference between these two readings will in most cases be very small leading to **no violation**.

Readings Early Sat AM  
Late Sun PM

The difference between these two readings will reflect nearly 2 full days weekend usage that could easily result in a **violation** and disconnection A **false violation** is created simply by arbitrary reading time selection and in no way reflects actual water usage.

Here in lies the problem and for potential abuse and harassment of EPV residents. In both cases the readings are in accordance with the stated PWC policy. In one case "0" usage is reported. This "0" usage becomes 2 days use and a potential violation simply by changing reading times. The difference between adjacent DAY to DAY meter readings is at best a weak indication of actual average use over any extended period of time and therefore cannot be used as the basis for establishing a **VIOLATION**. Average usage rates can only be determined by long term observations that take into account the day to day and week long variations that are a part of normal residential use.

In summary the fees and procedures set forth in the proposed PWC/EVP Curtailment plan are both excessive and flawed. They are primarily focused on revenue enhancement with faulty methods that are subject to arbitrary and capricious abuse. Finally in the interest of long term viability of the EVP infrastructure any reconnection fees that are collected under terms of a final agreement should be 100% escrowed to EVP improvements that will mitigate the need for a curtailment policy and water hauling.

A handwritten signature in black ink, appearing to be 'M. M. Cook', is located in the bottom right corner of the page.