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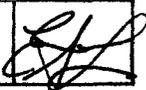
ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF PAYSON WATER CO., INC., AN
ARIZONA CORPORATION, FOR A
DETERMINATION OF THE FAIR VALUE
OF ITS UTILITY PLANTS AND
PROPERTY AND FOR INCREASES IN ITS
WATER RATES AND CHARGES FOR
UTILITY SERVICE BASED THEREON.

DOCKET NO: W-03514A-13-0111
Arizona Corporation Commission
DOCKETED

JAN 06 2014

DOCKETED BY 

IN THE MATTER OF THE APPLICATION
OF PAYSON WATER CO., INC., AN
ARIZONA CORPORATION, FOR
AUTHORITY TO: (1) ISSUE EVIDENCE
OF INDEBTEDNESS IN AN AMOUNT
NOT TO EXCEED \$1,238,000 IN
CONNECTION WITH INFRASTRUCTURE
IMPROVEMENTS TO THE UTILITY
SYSTEM; AND (2) ENCUMBER REAL
PROPERTY AND PLANT AS SECURITY
FOR SUCH INDEBTEDNESS.

DOCKET NO: W-03514A-13-0142

**PAYSON WATER CO., INC.'S
RESPONSE TO KATHLEEN M.
REIDHEAD'S MOTION TO
COMPEL DISCOVERY**

Payson Water Co., Inc. ("PWC" or "Company") hereby responds to Intervenor Kathleen M. Reidhead's Motion to Compel Discovery in the above-captioned consolidated docket. The Company respects the fact that Ms. Reidhead is pro per.¹ However, PWC is the applicant and party seeking relief in this case. Mr. Williamson is not a party to this proceeding and should not be compelled to answer discovery requests, particularly requests about his personal and private business relationships. Additionally, PWC objected to Ms. Reidhead's Data Requests 1, 2, 4, 5, and 6 because these data

¹ As is generally required of parties to a discovery dispute, Mr. Williamson did contact Ms. Reidhead in an effort to resolve her concerns in a less formal manner. Ms. Reidhead was not available and has not yet responded. The Company will continue its efforts to resolve this dispute informally.

1 requests are not calculated to lead to the discovery of admissible evidence in this
2 proceeding. This proceeding is to set rates for utility service. Mr. Williamson's private
3 life is simply not material to the determination of the fair value of PWC's utility plant and
4 property or the setting of rates thereon.

5 RESPECTFULLY SUBMITTED this 6th day of January, 2014.

6 FENNEMORE CRAIG, P.C.

7
8 By 
9 Jay L. Shapiro
10 2394 E. Camelback Road
11 Suite 600
12 Phoenix, Arizona 85016
13 Attorneys for Payson Water Co., Inc.

12 **ORIGINAL** and thirteen (13) copies
13 of the foregoing were filed
14 this 6th day of January, 2014, with:

14 Docket Control
15 Arizona Corporation Commission
16 1200 W. Washington Street
17 Phoenix, AZ 85007

16 **COPY** of the foregoing was hand delivered
17 this 6th day of January, 2014, to:

18 Dwight D. Nodes
19 Assistant Chief Administrative Law Judge
20 Arizona Corporation Commission
21 1200 W. Washington Street
22 Phoenix, AZ 85007

21 Robin Mitchell, Esq.
22 Legal Division
23 Arizona Corporation Commission
24 1200 W. Washington Street
25 Phoenix, AZ 85007
26

1 **COPY** of the foregoing was mailed
2 this 6th day of January, 2014, to:

3 Kathleen M. Reidhead
4 14406 S. Cholla Canyon Dr.
5 Phoenix, AZ 85044

6 Thomas Bremer
7 6717 E. Turquoise Ave.
8 Scottsdale, AZ 85253

9 Bill Sheppard
10 6250 N. Central Ave.
11 Phoenix, AZ 85012

12 J. Stephen Gehring
13 Richard M. Burt
14 8157 W. Deadeye Rd.
15 Payson, AZ 85541

16 Glynn Ross
17 405 S. Ponderosa
18 Payson, AZ 85541

19 By: 
20 8788204.1/073283.0006