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BEFORE THE ARIZONA CORPORATION COMMISSION

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**COMMISSIONERS**  
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Arizona Corporation Commission

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IN THE MATTER OF THE APPLICATION OF  
RANCHO SAHUARITA WATER COMPANY,  
L.L.C., FOR THE TRANSFER OF ITS  
CERTIFICATE OF CONVENIENCE AND  
NECESSITY TO SAHUARITA WATER  
COMPANY, L.L.C., AND EXTENSION OF THE  
CERTIFICATE OF CONVENIENCE AND  
NECESSITY FOR WATER SERVICE

Docket No. W-03718A-07-0687

**REPLY TO STAFF'S RESPONSE TO  
SAHUARITA'S MOTION FOR  
EXTENSION OF COMPLIANCE  
DATE**

Sahuarita Water Company, L.L.C. ("Sahuarita"), submits its reply to the Staff Response dated January 17, 2014. Sahuarita appreciates Staff's recommendation to grant an extension for filing its Approval to Construct ("ATC") to be issued by the Arizona Department of Environmental Quality for the Sahuarita Mission parcel, and does not object to deleting the two parcels now owned by mining companies (Freeport and ASARCO). But Sahuarita does believe that, given the uncertainty with the economy, a five-year extension is appropriate for the Sahuarita Mission parcel. As stated in its Motion filed November 4, 2013, the costs to prepare the system designs to ADEQ for approval are significant, and it is not prudent to do so before the development plans are known. Further, while uncertain about when development will occur, the Sahuarita Mission development has consistently stated its intent to move forward with developing its parcel once the economy improves.

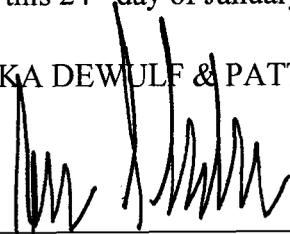
Sahuarita does not believe the time-frame it is requesting is arbitrary or unprecedented as compared to other public service corporations who have deferred capital projects due to the economic downturn. Especially given that Staff is recommending against any further extensions, Sahuarita requests approval of its original request for a five-year extension, until November 19,

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1 2018, to file its ATC. In the alternative, Sahuarita would request that it be allowed the opportunity  
2 to file an additional request for an extension, for up to three years (until November 19, 2018),  
3 should it need additional time to file the ATC to develop the facilities needed to serve Sahuarita  
4 Mission, for the reasons stated previously in this Reply and in its November 4, 2013 Motion.

5 RESPECTFULLY submitted this 24<sup>th</sup> day of January 2014.

6 ROSHKA DEWULF & PATTEN, PLC

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8  
9 By 

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15 Attorney for Sahuarita Water Company, L.L.C.

16 Original and 13 copies of the foregoing  
17 filed this 24<sup>th</sup> day of January, 2014, with:

18 Docket Control  
19 Arizona Corporation Commission  
20 1200 West Washington  
21 Phoenix, Arizona 85007

22 Copy of the foregoing hand-delivered/mailed  
23 this 24<sup>th</sup> day of January, 2014 to:

24 Belinda A. Martin  
25 Administrative Law Judge  
26 Hearing Division  
27 Arizona Corporation Commission  
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By *Alecia Marshall*