

Jeff Daniels
Tonto Village
173 S. Blackf
Payson, AZ 85541



0000151574

ORIGINAL

RECEIVED

Arizona Corporation Commission

Utilities Division

1200 West Washington Street

Phoenix, AZ 85541

2014 MAR -6 1 A 9:57

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

MAR 06 2014

RE: Docket # W-1580A-13-0255, Jake Garrett Intervention Request

February 28, 2014

DOCKETED BY

Commissioners,

I am requesting that you deny the request for intervention made by Jake Garrett. Obviously, he has the right to speak at an open meeting but we see no need for an "Intervention." The majority of reasons he gives in his request are inaccurate and untrue. Additionally, please note that this is the 5th letter in opposition to this rate application from Mr and Mrs Garrett. I will address each item below, paragraph by paragraph, in the order of his request letter. Please refer to his letter while reviewing our response.

Although Mr Garrett has been a long term resident of Tonto Village, he is not "very familiar" with the activities, practices, or methods used to operate this Company. He actually has little to no knowledge of the operations of this Company. He has never been involved in any repairs, maintenance, troubleshooting, regulatory reporting or compliance, office activities, and to my knowledge, has never even set foot on company property (with the exception of possibly walking over, or gardening on a company easement).

Public Health and Safety concerns:

The System does have isolation valves. Most need replacement but some are perfectly functional. We install valves when performing repairs if the location is appropriate. Mr Garrett is aware of this as we installed one in our easement in his back yard. This valve has been removed as it was mysteriously broken in half and we questioned vandalism. This was a 3" valve, less than one year old, over 3 feet below ground.

The system is looped throughout, there are no dead ends. Tonto Village 3 is one large loop and Tonto Village 1 & 2 consist of 3 loops. There are some mainline extensions that run down the cul-de-sacs to service those side streets. These are not considered "dead-ends" they are "Spurs".

We installed a flush point several years ago that is used regularly to flush the system after repairs. In fact, we had one customer complain that we were wasting water while we were flushing the system. It is a 2" line that we normally flush for 20-30 minutes.

There is no part of the system that is serviced with less than 20PSI. The lowest pressure we have found is 35-40 PSI during high usage times.

The Company is fully accountable to ADEQ. We have found no records of grandfathering any part of this system. We are regularly inspected by ADEQ and perform all required testing, monitoring and compliance. We have not found any regulations that vary between old and new systems as far as operations. All current regulations apply to all systems.

We follow all requirements and regulations of the ACC and ADEQ. We follow all proper procedures and practices. We are accountable to the citizens and regulatory agencies through annual reporting, testing results reporting, Consumer Confidence reports and regular inspections. ADEQ has established testing frequency for all harmful contaminants and we satisfy all requirements, there is no need for additional testing. Mr Garrett is aware that he can test the system for whatever he would like at his expense, as he has done in the past. We are presently working with WIFA to acquire funding for many of the distribution system improvements that we feel are appropriate including, but not limited to, more isolation valves.

Again, we do flush the system after all major repairs and the system is regularly chlorinated so all water has appropriate contact time with chlorine. There have been no complaints on record, since we purchased the Company, of anyone having any illness related to the water we supply. We have been to many households for meals and have never seen, nor heard of anyone that uses bottled water for cooking. To our knowledge Bottled water is a large industry and millions of people purchase bottled water for drinking all across the Country. We have also asked around and found that most of the residents do regularly drink the water we supply.

I have no detailed knowledge of Mr Garretts' sampling procedures and therefore cannot confirm or deny his reported "coliform event." We are curious to know how and why there is any "septic waters" near our water lines. Mr Garrett works for the County as a Septic Inspector and if he is aware of a failing septic system that might contaminate the water lines, it is his duty to take appropriate actions.

Mr Garrett is stating his assumption that the main line was tainted as fact, when he has no backing to this claim. ADEQ did not require the Company to sample after Mr Garretts claim, regular Monthly testing was performed. Sediment is inherent in any groundwater system as the water comes from the ground. Sediment is occasionally found in our Christopher Creek system even though all points of entry are filtered down to 10 microns.

Mr Garrett has not contacted us to suggest any flushing agreement. We do regularly mention to customers (including Mr/Mrs Garrett) that are near any major repair, to flush their lines with an outside spigot. We also mention that any infiltration of soil into the lines during a repair, might clog aerators located on most inside spigots.

Mr Garrett has confused some of the well numbers here but I will attempt to explain. Well 1 was made inactive due to it being very shallow and contaminate issues. Well 2b was installed to provide a more reliable water source. Well 2a is located approximately 30 feet from well 2b. Well 2a is inactive due to the fact that it is only 80 feet deep and its close proximity to well 2b. Well 3 is approximately ¼ mile away from well 2a-2b so I sincerely doubt that their cones of depression intersect. Well 2b is 650 feet deep and well 3 is 340 feet deep. Well 1 is almost ¼ mile from well 2b so I also doubt that 2b is pulling tainted water from well 1. Additionally, I have sampled water from well 2b directly from the well, prior to chlorination and it has always tested clean.

Well 2b pumps at approximately 75 gallons per minute (GPM). Well 2a pumped at 35 GPM showing an increase of 40 GPM. Well 3 pumps at 24 GPM providing a total of about 100 GPM to the system. There are 3 wells in this system with well 2a being inactive. Well 2b cost significantly less than \$112,000, I don't know where this figure comes from. We have no control over what the previous owners do with a well located on their private property.

We do not know how Mr Garrett formulated his suggested Rate Structure or what financial basis was used. We are already taking all steps needed to for water system operation and to protect public health. We are also always concerned with performing timely repairs and water losses.

We have already addressed the inconsistencies in Mrs Garretts letter related to this Docket # in a response to a previous complaint.

Thank You
Jeff Daniels