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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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11 IN THE MATTER OF THE APPLICATION OF
 12 EPCOR WATER ARIZONA INC., AN
 13 ARIZONA CORPORATION, FOR A
 14 DETERMINATION OF THE CURRENT FAIR
 15 VALUE OF ITS UTILITY PLANT AND
 16 PROPERTY AND FOR INCREASES IN ITS
 17 RATES AND CHARGES FOR UTILITY
 18 SERVICE BY ITS MOHAVE WATER
 19 DISTRICT, PARADISE VALLEY WATER
 20 DISTRICT, SUN CITY WATER DISTRICT,
 21 TUBAC WATER DISTRICT, AND MOHAVE
 22 WASTEWATER DISTRICT.

Docket No. WS-01303A-14-0010

ORIGINAL

RUCO'S REPLY TO THE COMPANY'S RESPONSE TO MOTION TO COMPEL

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby replies to the Company's Response to RUCO's Motion to Compel Discovery.

RUCO is simply asking the Company to provide it with starting balances and adjustments for its plant in service. On its face it would seem like RUCO's request is normal and what the Company would provide as a matter of course. In its response, the Company notes that RUCO complains because the information is not in the format that RUCO wants and that it is sufficient to provide RUCO with "data files" with the pertinent information. RUCO could then extrapolate the information and come up with the balances that the Company used in its case. The Company feels this is appropriate because RUCO did not "specifically" ask for it in

1 the format RUCO wanted. Apparently, from the Company's view the fault lies with RUCO for its
2 lack of specificity.

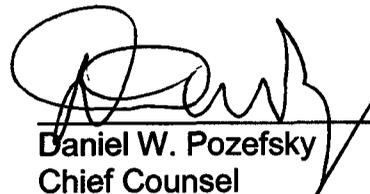
3 Perhaps the Company makes a point. Either the Company wants to change the game or
4 it has simply not put the information together in a format that is normally used. RUCO, of
5 course, will now have to jump through many more hoops to get to the balances that the
6 Company started out with, then of course, RUCO will have to verify with the Company that all
7 the numbers that it used and all of the balances that it came up with are correct and are the
8 numbers and balances that the Company started out with. Obviously this will take a lot more
9 time and use a lot more resources than would otherwise occur had the Company sent the
10 information in the traditional format. Since the filing date for RUCO's direct testimony is not
11 until October, RUCO cannot say for certain it will need an extension of time to file at this point
12 under the Company's view of discovery. However, when it becomes obvious, and it will, that
13 RUCO will need the extra time, RUCO will file its motion to suspend the procedural order.

14 For what it is worth, RUCO would further reply to the Company's response as follows.
15 RUCO briefly addressed the issue of the beginning balances in its Motion. It is not as simple as
16 the Company contends. It is true that RUCO can research and obtain the beginning plant
17 balances and beginning accumulated depreciation balances from the last authorized
18 Commission decisions and compile this information for all five districts into an excel sheet.
19 However, RUCO and the Company may interpret and/or decipher the previous decisions
20 authorized plant and accumulated depreciation balances differently. It is certainly not
21 uncommon for the parties to have different starting points than authorized from a prior decision
22 (For example - this occurred in the most recent LPSCO case regarding the beginning CIAC
23 balances).

1 Again, it is customary for these schedules as described to be included with the rate
2 application when it is originally filed, or produced shortly thereafter when inevitably requested.
3 RUCO's analysts do perform regulatory audits of information contained in these schedules, but
4 as a starter RUCO should not have to recreate these plant schedules from data files when the
5 information should have already been compiled by the Company and made a part of its
6 application. If the Company wants to change the game, it should not come as surprise when
7 parties are unable to meet the filing deadlines due to all the extra time required to assemble
8 information that should be provided as a matter of course.

9 The Company did say that it intends to provide the information to RUCO by June 30,
10 2014. In the end, all RUCO wants is the information in a format that it can use. If the Company
11 is willing to provide it in that format by June 30 and it comes on or before then – the issue goes
12 away. RUCO is willing to wait until June 30, 2014, to get all the information in a complete
13 format.

14 RESPECTFULLY SUBMITTED this 5th day of June, 2014

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16 
17 Daniel W. Pozefsky
Chief Counsel

18 AN ORIGINAL AND THIRTEEN COPIES
19 of the foregoing filed this 5th day
20 of June, 2014 with:

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