



1501 South La Cañada Drive • Green Valley, Ari:

Phone: (520) 625-8409 • Fax: (520) 625-

www.communitywater.com



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Arizona Corporation Commission

DOCKETED
June 18, 2014

JUN 18 2014

Commissioner Brenda Burns
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

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Re: Community Water Company of Green Valley's request to eliminate its BMP tariffs requirement in Docket No. W-02304A-10-0220 under A.R.S. § 40-252.

Dear Commissioner Burns:

You asked that Community Water Company of Green Valley ("CWCGV") provide a short summary of its request to eliminate its Best Management Practices ("BMP") tariffs requirement ordered in Decision No. 71478 (February 3, 2010). This letter summarizes the reasons set forth in CWCGV's filing submitted June 13, 2014:

- CWCGV is an Arizona non-profit corporation with members. Its members take an active role in operation of the water utility through direct election of the board of directors.
- CWCGV's customers' water use in 2010 was estimated to be at about 2,700 acre feet, and is among the lowest per-capita consumption within the Tucson Active Management Area.
- BMP tariffs 7.3 and 7.6 impose additional costs on CWCGV that will likely continue and significantly outweigh any benefits gained.
- BMP tariffs 2.1, 2.3, and 5.2 contain practices that CWCGV has already implemented and impose additional requirements that are unnecessary and could result in additional costs.
- No replacement BMP tariffs are required as CWCGV operates in the Tucson Active Management Area and participates in the ADWR Modified Non-Per Capita Conservation Program. It has a fully functioning water conservation program that includes five BMPs as required by ADWR.

CWCGV believes that the BMP tariffs are either unnecessary or will likely result in additional costs if they remain in effect. As a founder, CWCGV continues as an active member in the Water Conservation Alliance of Southern Arizona, an organization that promotes water conservation through many activities.

Because CWCGV is located within the Tucson AMA, it is subject to state groundwater protection laws as enforced by ADWR. CWCGV's request is also consistent with recent Commission decisions, including for Pima Utility Company in Decision No. 73573 (November 21, 2012) and New River Utility Company in Decision No. 74294 (January 29, 2014). Both utilities were in ADWR's MNPCCP and within the Phoenix AMA; thus the Commission found that additional BMP tariffs were not necessary.

CWCGV BMP Request to Commissioner Burns, June 2014

Our mission ... is to reliably deliver drinking water to our customers, and to maintain a sustainable water supply.

CWCGV appreciates the Commission's consideration of its request. We would be happy to provide any additional information either the Commission or its Utilities Division Staff regarding its request.

Sincerely,

Arturo R Gabaldon
by Pierre Hanhart
CWCGV Controller

Arturo Gabaldón
President

cc: Chairman Bob Stump
Commissioner Gary Pierce
Commissioner Bob Burns
Commissioner Susan Bitter Smith