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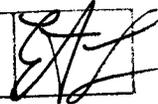
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

AZ CORP COMMISSION
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Arizona Corporation Commission
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JUL 7 2014

In Re: Docket No. RU-00000A-14-0014

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Dear Commissioners and Staff:

Responsible Water looks forward to working with the Commission on the important issue of protecting customer information – it is certainly one of the most important obligations we have to our customers. We look forward to the process, and will be working with Staff and other companies to address the rules in general; and the following items in particular:

1. Rule 2201
 - a. Paragraphs 6 and 7 address the need to prevent wrongful disclosure; we are concerned with the breadth of the definition of “disclose” and “disclosure” as they may be read to cover accidents and theft. Certainly, companies need to safeguard their systems, but will the Commission begin regulating how companies safeguard their data?
2. Rule 2203
 - a. Part C requires extensive use of confidentiality agreements – we see the need for those, of course, but are concerned that the legal costs for small companies could become very difficult. And again, the breadth will need to be clarified: As but one example, if a small company sends out a contractor with a backhoe to work on a customer outage, is a confidentiality agreement required?
3. Rule 2209
 - a. Subparagraphs B and C will require a comprehensive record keeping and maintenance operation. For small companies in particular, this could become very, very challenging.
4. Rule 2212
 - a. Paragraph A seems to require a near-constant upgrading and updating of security protocols. This is quite costly for large companies, and quite complex for small companies.
 - b. Furthermore, the breadth of “wireless transmission” in Paragraph B will need to be clarified. Many water companies use “drive by” meters that feed from the meter to the service truck to gather usage data – password protecting and encrypting those systems would very likely eliminate the efficiency savings of drive by meter reading.

We thank the Commission for raising this important issue and look forward to working with Staff on these and other items.

Sincerely



Paul Walker
Chairman

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