

Sahuarita

Water Company



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ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

October 15, 2014

Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

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Arizona Corporation Commission

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OCT 22 2014

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Re: Sahuarita Water Company's request to eliminate its BMP tariffs requirement in Docket No. W-03718A-07-0687 under A.R.S. § 40-252.

To whom it may concern,

Sahuarita Water Company ("SWC") respectfully requests that the Arizona Corporation Commission ("Commission") eliminate its Best Management Practices tariffs (BMPs) requirement originally ordered in Decision No. 70620 (November 19, 2008).¹ SWC filed 11 proposed BMPs on December 9, 2009 and those BMPs remain in effect. This is five more than what the Arizona Department of Water Resources ("ADWR") would require under its Modified Non-Per Capita Conservation Program. In short, SWC believes that the BMP tariffs impose unnecessary costs and additional work load that outweigh any benefits gained. What follows is a summary of why the Commission BMPs requirement should now be eliminated.

- SWC's service area consists of homes that are 12 years and newer. These homes have been constructed with the latest low-flow fixtures, toilets and appliances. Additionally homes are constructed with drip irrigation and drought tolerant trees and foliage. Further, none of the homes within SWC's service area use evaporative cooling (swamp coolers). According to a recent study conducted by Montgomery and Associates for Pima County, the average useful life for these appliances and fixtures is usually between 11 and 15 years. Because the efficiency standards keep getting better, these new fixtures and appliances will always meet the most current standards. This will consequently have a positive effect on conservation within the SWC service area.
- SWC currently holds a designation of assured water supply (DAWS) from ADWR and is a provider in the Tucson Active Management Area (TAMA). SWC participates in the Gallons-Per-

¹ The Commission indicated that SWC had met its BMPs obligation in Decision No. 72177 (February 11, 2011). SWC further indicated that it had replaced BMP tariff 7.8 with BMP tariff 5.2 in a filing on December 1, 2011 in Docket No. W-03718A-09-0359.

Capita-Per-Day ("GPCD") program and is currently in compliance with the Management Plan for the TAMA. Because SWC is within the TAMA, it is subject to state groundwater protection laws as enforced by ADWR.

- SWC is also a member service area of the Central Arizona Groundwater Replenishment District (CAGRDR). As such, the CAGRDR recharges the required percentage of water pumped by SWC each year. Beginning in 2015 SWC will be required to replenish (through recharge) all groundwater pumped. With the oversight of ADWR, water providers in the TAMA have done an excellent job in managing its water resources and promoting conservation. SWC believes that ADWR oversight is sufficient.

As part of SWC's commitment to conservation, SWC will continue to perform the following activities as part of our Standard operating procedures: SWC will continue to inform the public through its Public Education Program. Conservation tips and literature are available to our customers 24/7 at <http://sahuaritawater.com/water-conservation/> Reminders about the website will be periodically printed on the water bill. Free written conservation literature is available to our customers in the business office and is provided to all new customers when they establish an account. Additionally, SWC currently maintains and will continue to maintain a water-efficient demonstration garden with appropriate signage on the plants and techniques used.

Further, SWC maintains a trained water-conservation-audit specialist on staff, who conducts residential audits and is available for landscape consultations. It is also SWC's standard operating procedure to check abnormally high and low reads. Both low and high reads are then checked against the usage history for those accounts. If there is an anomaly, a water operator is sent out to get a re-read and check for leaks or a stuck meter. If the meter is stuck it will be replaced. If no leaks are found but there is higher than normal usage, the customer is contacted by one of our customer service representatives. If the reason for the high usage is unknown, then we recommend a water audit be conducted at their property free of charge. Encouraging water conservation will always be a standard operating procedure for SWC.

SWC's request is also consistent with recent Commission decisions, including for Pima Utility Company in Decision No. 73573 (November 12, 2012), New River Utility Company in Decision No. 74294 (January 29, 2014), and Community Water Company of Green Valley in Decision Nos. 74586 (July 30, 2014) and 74687 (August 12, 2014). All three utilities are subject to ADWR oversight and are within Active Management Areas. The Commission found in all those cases that additional BMP tariffs were not necessary. Further, SWC is part of ADWR's GPCD program, which means it must meet per-capita-use targets or impose stringent conservation measures under ADWR.² Thus, SWC is subject to the same ADWR authority as the other water companies within an AMA. SWC therefore believes that eliminating its BMP tariffs requirement is appropriate at this time.

² For SWC, which has a DAWs, the GPCD is an alternative program to the MNPCCP. See http://www.azwater.gov/AzDWR/WaterManagement/AMAs/TucsonAMA/TAMAConservation.htm#conservation_regs.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Geoff Caron', with a long horizontal flourish extending to the right.

Geoff Caron

General Manager

Sahuarita Water Company

cc: Chairman Bob Stump
Commissioner Gary Pierce
Commissioner Brenda Burns
Commissioner Bob Burns
Commissioner Susan Bitter Smith.
Steve Olea, Utilities Division Director