



0000168013

ORIGINAL

RECEIVED

BEFORE THE ARIZONA CORPORATION COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

SUSAN BITTER SMITH
Chairman

BOB STUMP
Commissioner

BOB BURNS
Commissioner

DOUG LITTLE
Commissioner

TOM FORESE
Commissioner

NOV 20 2015
AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

DEC 29 2015

DOCKETED BY
KX

IN THE MATTER OF THE APPLICATION OF ARIZONA-AMERICAN WATER COMPANY, AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE CURRENT FAIR VALUE OF ITS UTILITY PLANT AND PROPERTY AND FOR INCREASES IN ITS RATES AND CHARGES BASED THEREON FOR UTILITY SERVICE BY ITS ANTHEM/AGUA FRIA WASTEWATER DISTRICT, SUN CITY WASTEWATER DISTRICT, AND SUN CITY WEST WASTEWATER DISTRICT

DOCKET NOS. SW-01303A-09-0343
W-01303A-09-0343

RESPONSE TO REQUEST OF INTERVENOR FREDERICK G. BOTHA

EPCOR Water Arizona Inc. ("EWAZ" or "Company") hereby files its Response to the request filed by Intervenor Frederick G. Botha on December 14, 2015. EWAZ has on three separate occasions met with Mr. Botha to provide him assistance with his inquiries. EWAZ has provided paper and electronic copies of rate schedules and has met with Mr. Botha to discuss the regulatory process in Arizona. EWAZ has also explained to Mr. Botha the methodology being used to deconsolidate plant assets according to the deconsolidation order.

EWAZ has communicated to Mr. Botha on several occasions, through both in-person discussion and email, that it is premature to provide results of 2015 operations or

201 E. Washington St., Suite 1200
Phoenix, AZ 85004-2595

LEWIS ROCA
ROTHGERBER

1 results of plant asset deconsolidation because 2015 financials are not yet complete, and
2 the schedules themselves are not yet compiled in final form. Mr. Botha has asked for, and
3 EWAZ has explained, that a separate scenario, whereby Corte Bella's stand-alone
4 expenses and rate base are provided has not been ordered at this time. Rather, the
5 Commission has ordered a consolidation scenario of its Northeast Agua Fria area
6 (comprised of Corte Bella, Rancho Cabrillo, Coldwater Ranch, Cross River, Dos Rios,
7 Rancho Silverado, and Rio Sierra) with Sun City West.

8 The Company has also clearly communicated that it is not required to, and has no
9 plans to, make its accounting system available on its website. The Company files the
10 required annual reports with the Commission by April 1 of every year. That financial
11 information is available to all interested parties.

12 At this time, EWAZ believes that Mr. Botha's latest request for information is
13 premature. EWAZ will file the Application in this matter on or before April 29, 2016, at
14 which time, Mr. Botha will have an opportunity to seek intervention and participate in
15 discovery. EWAZ, as it has always done, will answer Mr. Botha's data requests
16 submitted subsequent to Staff's determination of the sufficiency of the Application with
17 the same respect and attention as any other intervenor (e.g. RUCO or ACC Staff). As a
18 result, EWAZ agrees with Commission Staff that there is no need for a further proceeding
19 at this time.

20 Respectfully submitted this 29th day of December, 2015.

21 LEWIS ROCA ROTHGERBER, LLP

22
23
24 By _____



25 Thomas H. Campbell
26 Michael T. Hallam
201 E. Washington, Suite 1200
Phoenix, Arizona 85004
Attorneys for EPCOR Water Arizona Inc.

1 ORIGINAL and thirteen (13) copies
2 of the foregoing filed
3 this 29th day of December, 2015, with:

3 The Arizona Corporation Commission
4 Utilities Division – Docket Control
5 1200 W. Washington Street
6 Phoenix, Arizona 85007

5 Copy of the foregoing hand-delivered
6 this 29th day of December, 2015, to:

7 Thomas Broderick
8 Utilities Division
9 Arizona Corporation Commission
10 1200 W. Washington Street
11 Phoenix, Arizona 85007

10 Dwight Nodes
11 Administrative Law Judge, Hearing Division
12 Arizona Corporation Commission
13 1200 W. Washington Street
14 Phoenix, Arizona 85007

13 Robin Mitchell
14 Bridgett Humphrey
15 Legal Department
16 Arizona Corporation Commission
17 1200 W. Washington Street
18 Phoenix, Arizona 85007

16 Copy of the foregoing mailed and/or emailed
17 this 29th day of December, 2015, to:

18 Lawrence V. Robertson, Jr.
19 P.O. Box 1448
20 Tubac, AZ 85646-1448
21 tubaclawyer@aol.com
22 Attorney for Anthem Community
23 Council

Michele L. Van Quathem
Ryley Carlock & Applewhite
One N. Central Ave, Suite 1200
Phoenix, AZ 85012
mvanquathem@rcalaw.com
lgefroh@rcalaw.com
Attorneys for Verrado Community Assn., Inc.

22 Daniel W. Pozefsky
23 Chief Counsel
24 Residential Utility Consumer Office
25 1110 West Washington Street
26 Suite 220
Phoenix, Arizona 85007
dpozefsky@azruco.gov
cfraulob@azruco.gov

Cynthia S. Campbell
Paul Norman
Assistant City Attorneys
Office of the City Attorney
City of Phoenix
200 W. Washington, Suite 1300
Phoenix, AZ 85003
cynthia.campbell@phoenix.gov
paul.norman@phoenix.gov

1 Jeffrey W. Crockett
Crockett Law Group
2 1702 E. Highland Ave, Suite 204
Phoenix, Arizona 85016
3 jeff@jeffcrockettlaw.com
Attorneys for Russell Ranch
4 Homeowners Association, Inc.

5
6 Andrew M. Miller, Town Attorney
Town of Paradise Valley
6401 E. Lincoln Drive
7 Paradise Valley, AZ 85253
amiller@paradisevalleyaz.gov

8
9
10 Karen D. Proctor
11 11716 W. Villa Chula Court
Sun City, AZ 85373
12 Kdprocto@gmail.com

13 Diane Smith
Government Affairs Committee
14 13234 W. Cabrillo Drive
Sun City West, AZ 85375
15 Skylar_98@q.com

16
17 Regina Shanney-Saborsky
Government Affairs Committee
18 c/o Corte Bella Country Club
22155 North Mission Drive
19 Sun City West, AZ 85375
20 rsaborsky@cox.net

21 Greg Eisert, Director & Chairman
Government Affairs Committee
22 Sun City Homeowners Association
10401 W. Coggins Drive
23 Sun City, AZ 85351
24 gregeisert@gmail.com

Judith M. Dworkin
Roxanne S. Gallagher
SACKS TIERNEY PA
4250 N. Drinkwater Blvd., Fourth Floor
Scottsdale, AZ 85251-3693
Judith.Dworkin@SacksTierney.com
Roxann.Gallagher@SacksTierney.com
Jessica.Chester@SacksTierney.com
Attorneys for Anthem Community Council

Bradley J. Herrema
Robert J. Saperstein
Brownstein Hyatt Farber Schreck, LLP
21 E. Carrillo St
Santa Barbara, CA 83101
BHerrema@bfhs.com
RSaperstein@bfhs.com
Attorneys for Anthem Golf and Country Club

Albert E. Gervenack
14751 W. Buttonwood Drive
Sun City West, AZ 85375
agervenack@bmi.net

Douglas Edwards
Government Affairs Committee
13517 W. Sola Drive
Sun City West, AZ 85375
d.edwards795@yahoo.com

Frances A. Noe
11756 W. Daley Ln.
Sun City, AZ 85373
noeshomes@earthlink.net

Frederick G. Botha
23024 N. Giovota Drive
Sun City West, AZ 85375
Fgbotha45@gmail.com

Robert McKenzie
41633 N. Panther Creek Trail
Anthem, AZ 85086

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

W.R. Hansen
12302 W. Swallow Drive
Sun City West, AZ 85375

Jayne Williams