

ORIGINAL

EXCEPTION



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14 *Attorneys for Maricopa County Municipal
15 Water Conservation District Number One*

16 **BEFORE THE ARIZONA CORPORATION COMMISSION**

17 DOUG LITTLE, CHAIRMAN
18 BOB STUMP, COMMISSIONER
19 BOB BURNS, COMMISSIONER
20 TOM FORESE, COMMISSIONER
21 ANDY TOBIN, COMMISSIONER

22 IN THE MATTER OF THE APPLICATION
23 OF LIBERTY UTILITIES (LITCHFIELD
24 PARK WATER & SEWER) CORP. FOR A
25 CERTIFICATE OF CONVENIENCE AND
26 NECESSITY TO PROVIDE WASTEWATER
27 UTILITY SERVICE IN MARICOPA
28 COUNTY, ARIZONA.

Docket No.: SW-01428A-15-0259

**EXCEPTIONS TO STAFF REPORT
RECOMMENDATIONS**

Maricopa County Municipal Water Conservation District Number One (“MWD”), through its undersigned attorney, hereby objects to portions of the Arizona Corporation Commission Staff Report docketed April 5, 2016 in this matter (“Staff Report”).

In particular, MWD objects to the following items in the Staff Report:

1. The recommendation that an “Order Preliminary” be issued for Zanjero Trails planning Phases III through VI, in lieu of awarding the CC&N with conditions recommended for Phases I and II, is arbitrary and unreasonable. MWD explains below, and will offer evidence

1 through one or two witnesses at the April 26, 2016 hearing in this matter, that MWD needs a
2 CC&N for the entire property now in order to avoid unnecessary delay and uncertainty in its
3 continued development and use of the entire property.

4 2. Even if the Order Preliminary concept is adopted by the Commission over MWD's
5 objection, the Staff recommendation that a CC&N not issue for any part of Phases III through
6 VI until all recommended conditions for all of Phases III through VI are met (see
7 recommendation number 11 on page 6 of the Staff Report) is unreasonable and arbitrary. The
8 way the recommendation is currently written, no facilities could be constructed in any of Phases
9 III, IV, V, and VI until the conditions are met for all of these phases, with the last compliance
10 deadline anticipated in 2036. It is unreasonable to expect MWD to wait until 2036 to get a
11 CC&N when there is a need for a CC&N today.

12 **Background in Support of Exceptions**

13 The Commission grants CC&N extensions upon proof of a public need and necessity for
14 service in the proposed extension area. *See* A.R.S. § 40-282 and A.A.C. R14-2-602, *generally*.
15 A public need and necessity already exists in this case for sewer service such that the
16 Commission should grant a CC&N now for the entire Zanjero Trails expansion area (Phases I-
17 VI), and reject the Staff's recommendation to withhold a CC&N for phases III through VI of the
18 planned development through issuance of an order preliminary.¹ The Commission already
19 granted a water CC&N for all of the area requested in this application. *See* Staff Report, p. 2.

20 **A. The Landowner Has Requested a Sewer Service CC&N for the Whole Property**

21 The Staff Report recognizes that "[a] request for service is fundamental in determining
22 whether a need for a CC&N exists." Staff Report, p. 3. There is no question in this case that a
23 request for service has been made for a CC&N for the entire property, the details of which are
24 summarized below.

25 MWD is a municipal corporation formed under Chapter 19 of Title 48, Arizona Revised
26 Statutes. MWD is the owner of all of the property included within Liberty Utilities (Litchfield
27 Park Water & Sewer) Corp. ("Liberty's") request in this matter. The property is currently being

28 ¹ *See* Exhibit E (Phasing Plan) for phase 1-6 locations.

1 developed in a master plan named Zanjero Trails. MWD has invested significant time and
2 resources in developing Zanjero Trails, including a pursuit of certainty in a sewer service plan
3 for the property that has already spanned 13 years.

4 In 2003, a group of landowners of approximately 3,400 acres that included MWD,
5 Savannah, Jackrabbit Estates, and other properties in the area approached Liberty (previously
6 named Litchfield Park Sewer Company) and requested a sewer service agreement. The
7 landowner/developer group funded and constructed a 6.2-mile long sewer trunk line at a cost of
8 approximately \$6.3 million. *See Exhibits A (original landowner group properties) and B (sewer*
9 *line map showing points of interconnection and route to Liberty's Sarival Lift Station).* The
10 trunk line is sized to collect the sewer from all of the approximately 3,400 acres of land.

11 Liberty filed an application to extend its CC&N in 2005 to include these properties. *See*
12 *Docket No. SW-01428A-05-0022.* The Staff at that time recommended a number of terms to
13 which Liberty objected and the expansion process stalled, resulting in Liberty's ultimate
14 withdrawal of that application in July 2008.

15 Starting again in 2010, MWD asked Liberty to again pursue a CC&N. In 2014, Liberty
16 agreed to pursue the CC&N expansion for Zanjero Trails, and then filed the present application
17 in 2015. MWD has requested sewer service from Liberty since 2003 – a period spanning 13
18 years so far, and MWD already invested a substantial portion of the \$6 million cost of the
19 existing sewer collection pipe that connects to Liberty's facilities. There is no question in this
20 case that the landowner has requested sewer collection and treatment service.

21 **B. Staff Recommendation to Withhold CC&N for Phases III-VI is Not Justified**

22 Despite the landowner's request for a sewer service CC&N for all of Zanjero Trails now,
23 the Staff Report recommends denial of a CC&N for Phases III through VI with issuance of an
24 order preliminary. *See, for example, recommendations on pages 5-6 of the Staff Report.* The
25 Staff characterize the order preliminary on page 4 of the Staff Report as a benefit to MWD, but
26 the opinion fails to recognize that an order preliminary is not a CC&N. Under an order
27 preliminary, Liberty is not authorized to construct facilities or to provide sewer service to the
28 property, which would leave MWD in essentially the same position it is in today. While the

1 remaining Commission process to issue a CC&N once an order preliminary has issued is
2 promised as a more efficient process than starting over with a new application, MWD has no
3 assurance that the Commission process and opinions will not change in the interim, or that
4 additional factors might be introduced that would negate any advantage to having the order
5 preliminary. In other words, an order preliminary provides MWD no sewer service and no
6 certainty, which is the whole point of requesting a CC&N.

7 The Staff have not asserted any remaining insufficiency in Liberty's application as a
8 basis for the order preliminary recommendation, but instead appear to justify the order
9 preliminary recommendation on the following two bases: (1) a desire to retain the
10 Commission's ability to enforce conditions for the requested service and (2) a desire to require
11 Liberty to entitle and construct facilities later in time when they are needed. *See* Staff Report, p.
12 4. However, both of these goals can be met through grant of a CC&N with conditions as has
13 been the Commission's longstanding practice. The Commission will certainly retain its
14 regulatory authority over Liberty after the CC&N is issued, and there is no requirement or
15 expectation that Liberty would construct all facilities at once upon issuance of the CC&N.
16 There are many examples where the Commission has previously issued full CC&Ns with
17 conditions for large developments that anticipate constructing facilities in phases. *See, for*
18 *example, recent Commission Decision No. 74786 (rejecting in paragraph 44 an order*
19 *preliminary recommendation for a portion of requested area) and Decision No. 75293 (no order*
20 *preliminary proposed or required for nearby 4,414-acre Loop 303 Project area).*

21 The Staff recommendation for an order preliminary also fails to recognize that Zanjero
22 Trials Phases I through VI are one contiguous and integrated development plan utilizing the
23 same sewer provider and integrated sewer facilities. The benefits of consistency, efficiency, and
24 certainty earned through master planning the sewer infrastructure for this area (benefits that are
25 clearly recognized in the Commission's CC&N rule and associated review process) are lost if
26 those looking to build homes and businesses in the area cannot count on a sewer provider's
27 commitment to serve the entire master planned area. The plan submitted to the Commission
28

1 assumed that a CC&N would be granted simultaneously for the whole Zanjero Trails master
2 plan area.

3 **C. There is a Present Need for a CC&N for the Entire Property – Development is**
4 **Not Speculative**

5 The Staff Report opines based upon a development estimate submitted for each planning
6 phase, that development within a portion of the Zanjero Trails planned area is speculative. *See,*
7 *for example,* Staff Report at pp. 3-4. The development plans did not contemplate, however, that
8 a CC&N for service would be withheld for a portion of the master plan for many years beyond
9 2016. Although development plans seek to accurately predict the pace and location of
10 development, the plans often change based upon market conditions, and that is already
11 happening in this case. Withholding a CC&N for a portion of the Zanjero Trails development
12 now will hinder the ability to develop those properties without further delay.

13 MWD will present evidence at the hearing that SBH Zanjero Trails LP (“Sunbelt”) is
14 currently moving forward on a portion of Zanjero Trails named Windrose that is located within
15 Phases I, II, and VI. *See Exhibits C, D, and E.* Sunbelt is eagerly awaiting the Commission’s
16 grant of a CC&N extension in this matter to support Sunbelt’s ongoing development process.
17 Sunbelt is nearing completion of final plats for 427 lots and anticipates construction of
18 infrastructure will begin this summer.

19 Further, the map at Exhibit A demonstrates that development has already occurred or is
20 occurring adjacent to every area within Zanjero Trails, including Phase VI. For example, the
21 Cortessa development adjacent to Phase V of Zanjero Trails is almost complete, making Zanjero
22 Trails Phase V the next natural development area. Given present market conditions, the multiple
23 zoning categories available in Zanjero Trails Phases IV and V may now make them more
24 attractive for development than Phases I and II.

25 MWD will offer evidence at the hearing regarding market activity in the Zanjero Trails
26 area, including documentary evidence similar to the attached Exhibits C-E, G-J.

27 Development of the property with a Commission-regulated entity requires the certainty of
28 having an authorized commitment for sewer service as a condition of development investment,

1 and the Commission's withholding of the CC&N would only serve to harm MWD's ability to
2 timely develop the master plan. The Commission should reject the Staff recommendations to
3 issue an order preliminary in lieu of a full CC&N, and instead should issue a full CC&N (with
4 conditions) now.

5 RESPECTFULLY SUBMITTED this 19th day of April, 2016.

6
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1 **ORIGINAL** of the foregoing
2 filed this 19th day of April, 2016 with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 W. Washington Street
6 Phoenix, AZ 85007

7 **COPY** of the foregoing hand delivered
8 this 19th day of April, 2016 to:

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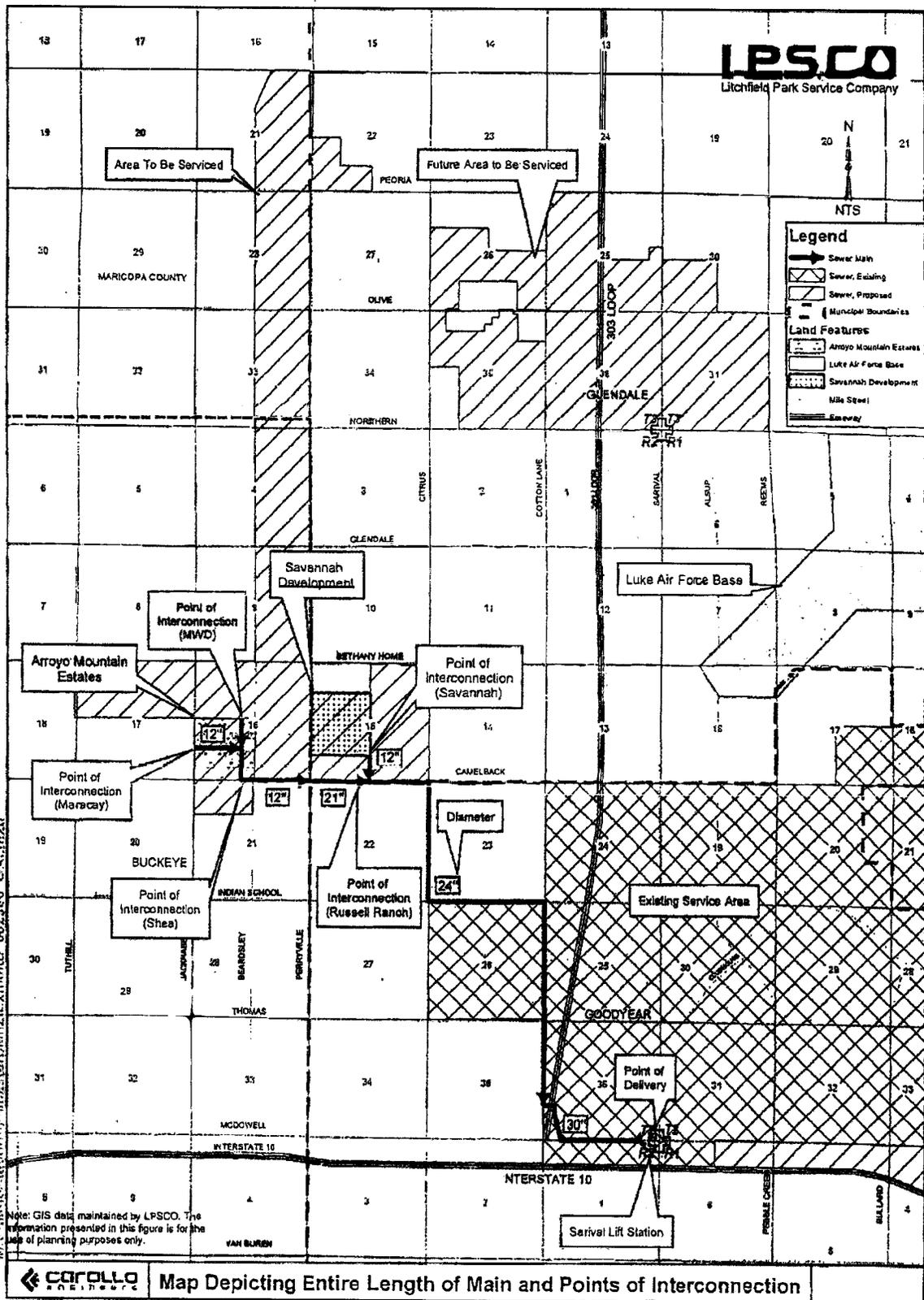
List of Exhibits

- A – Original Landowner Properties
- B – Existing Sewer Line Map
- C – Zoning Map
- D – Windrose Site Plan
- E – Sewer Master Plan Phasing Exhibit
- F – TerraWest Development Plan
- G – North Goodyear Submarket Lot Inventory Map 3-7-2016
- H – North Goodyear Submarket Lot Inventory Table 3-7-2016
- I – South Surprise Submarket Activity Map 4-11-2016
- J – South Surprise Submarket Lot Inventory Table 3-7-2016

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Map and Description of Main





Vicinity Map
N.T.S.

Legend

- Boundary
- Beardsley Canal
- McMillen Dam
- Arterial
- Collector

Surprise Zoning Category

- PAD-R1-18
- PAD-R1-8
- PAD-R1-5
- PAD-R-2
- MU-PD
- PAD-C-1
- PAD-C-2
- PAD-School

Surprise Zoning District

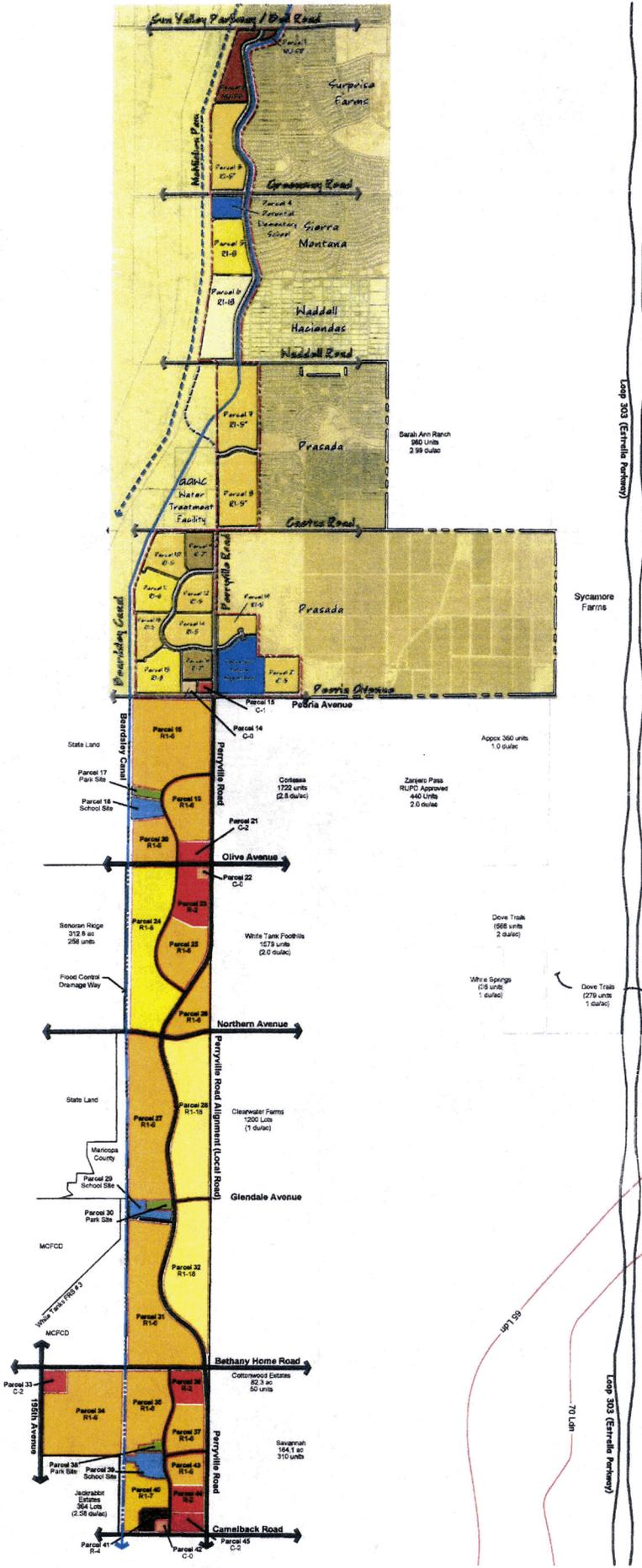
- PAD
- C-2

County Zoning District

- Rural-43

County Zoning Category

- R1-18 (RUPD) with PAD overlay
- R1-8 (RUPD) with PAD overlay
- R1-7 (RUPD) with PAD overlay
- R1-6 (RUPD) with PAD overlay
- R-2 (RUPD) with PAD overlay
- R-4 (RUPD) with PAD overlay
- C-2 (CUPD) with PAD overlay
- C-0 (CUPD) with PAD overlay
- C-1 (CUPD) with PAD overlay
- Rural - 43 (Park Site) with PAD overlay
- R1-8 (RUPD) (School) with PAD overlay
- Potential Church Site with PAD overlay



Location Map



Scale: 1" = 3,000'

Zanero Trails

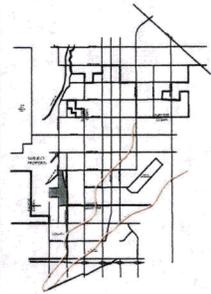
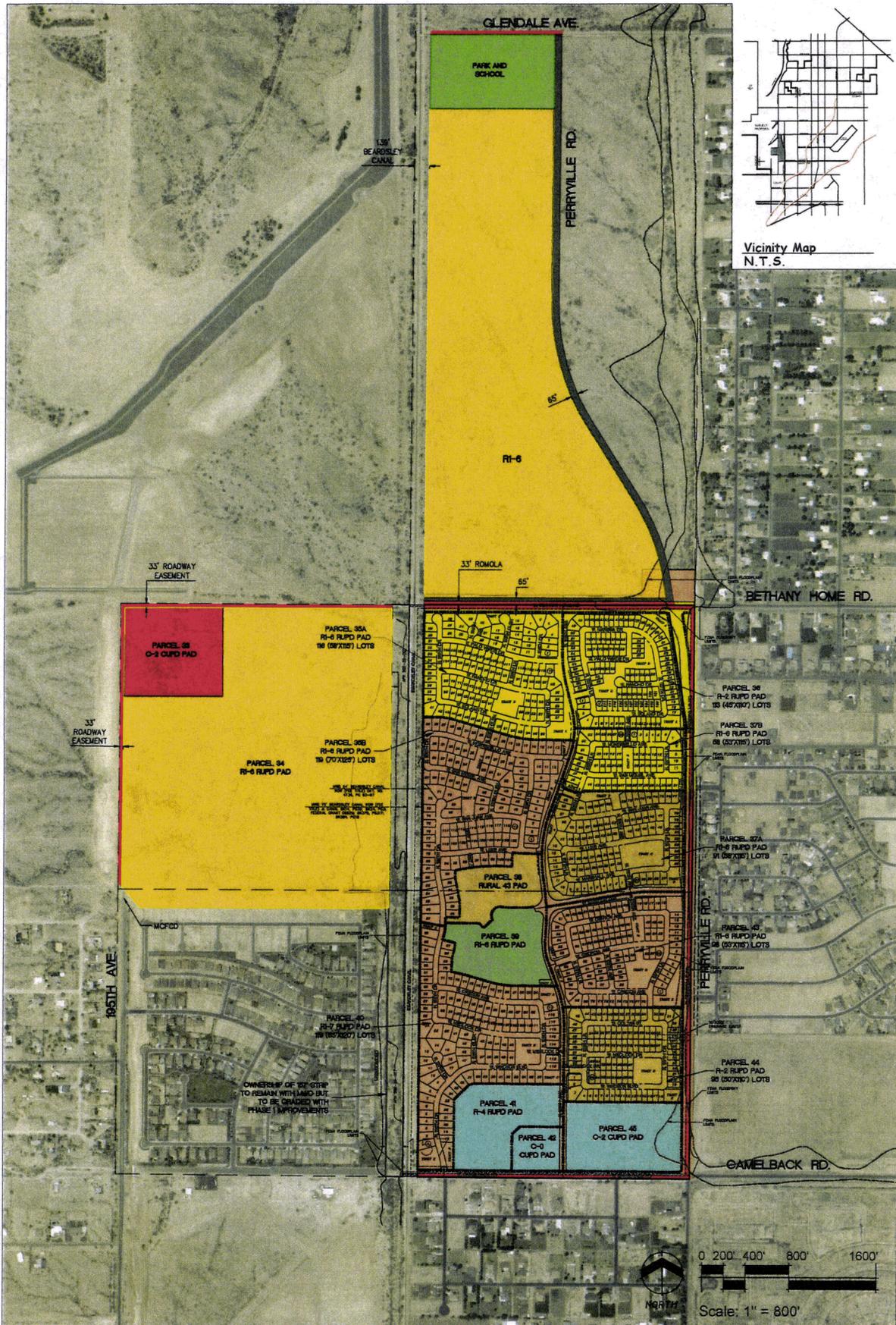


hilgartwilson
ENGINEERS • PLANNERS • SURVEYORS

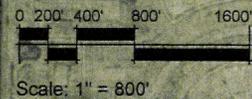
Project Manager: R. HILGART
Designed By: hilgartwilson
Drawn By: hilgartwilson

U:\110001\008\KEMH\SR11003 Map.dwg 02-10-2010 - 2:06pm

FEBRUARY 2010
Revision Date:



Vicinity Map
N.T.S.



Scale: 1" = 800'

Zanjero Trails
Maricopa County, Arizona

PHASE 1 SUB-PHASING			
	PLAT BOUNDARY		PHASE 1A
	PARCEL BOUNDARY		PHASE 1B
	R1-6		PHASE 1E
	C-2*		PHASE 1D

OCTOBER 2015
Project Number: 1003.70
Project Manager: Ron Hilgart, PE
Designed By: T. Bonar, AICP
Graphics By: DR
Drawn By: DR



11/10/2015 10:00 AM Hilgart Wilson 1003.70 PLANS EXHIBIT D.dwg
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PARCEL	LOT SIZE	TOTAL
12A	53'X115'	97
12B	58'X120'	121
12C	75'X120'	116
13A	48'X115'	92
13C	53'X115'	118
TOTAL		544

**ZANJERO TRAILS
SEWER SERVICE AREA**

HILGARTWILSON
ENGINEER | PLANNING | SURVEY | MANAGER

SCALE: 1"=200' (24 X 36)
APRIL 2016

BY: [Name] / DATE: [Date] - [Project Name] - [Location] - [Scale] - [Drawing No.]

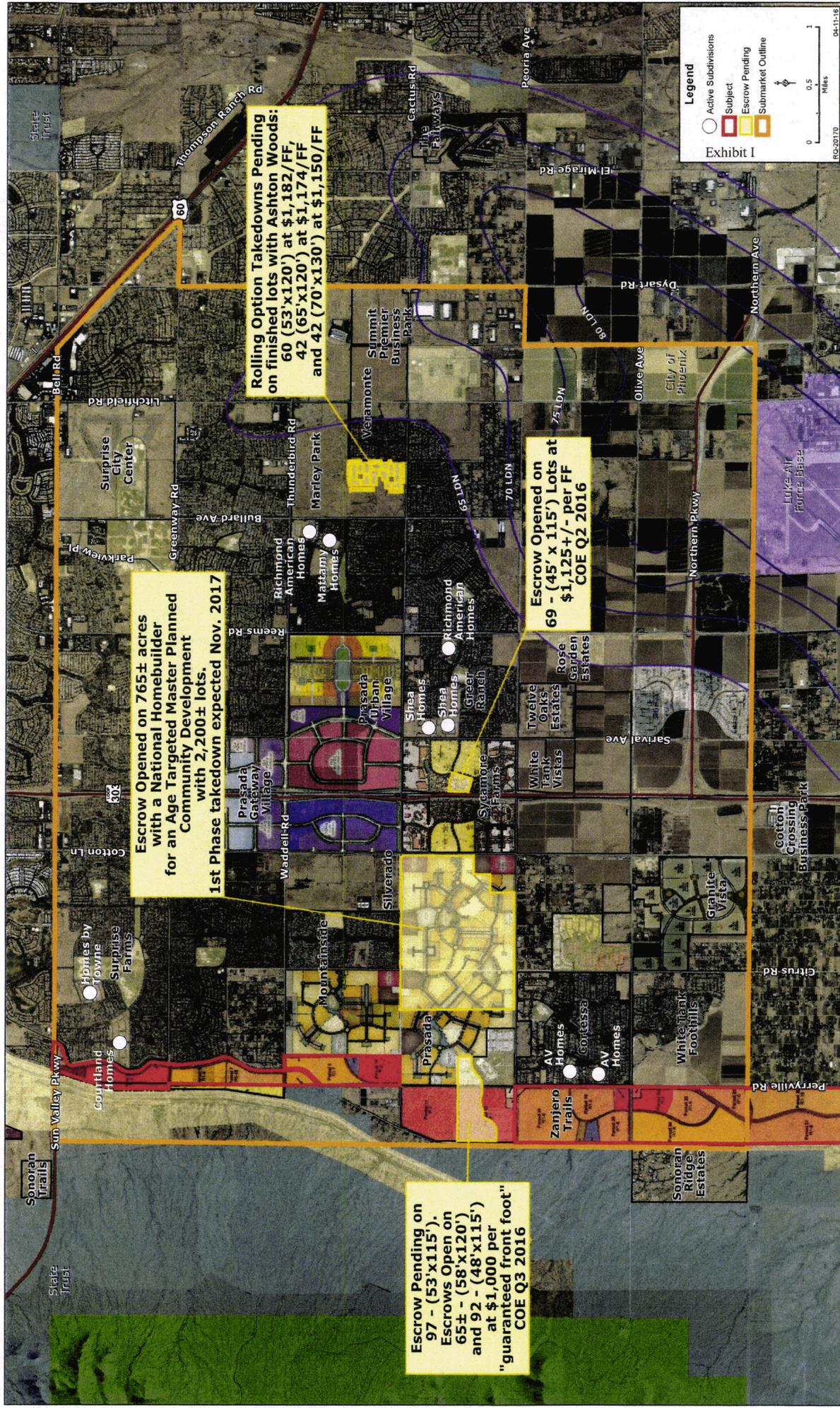
NORTH GOODYEAR SUB-MARKET							
Finished and Partially Improved Production Lot Inventory (45' - 100' Width) Status							
Updated: 3-7-16 (Belfiore Survey Date 2/17/16 - 2/26/16)							
Builder or Owner	Subdivision	Lot		Finished		Partially Improved	Comments
		Width	Depth	Active	Inactive		
Meritage Homes	La Paz/Cadiz at Sedella	75	135	41			4 sales / month YTD 2016
K Hovnanian	Artisan at Palm Valley	60	120	10			
Meritage Homes	Del Mar/Molina at Sedella	65	130	11			
Av Homes	The Villas at Litchfield Park	80	140	37			3.0 sales / month YTD 2016
Mattamy	Canyons at Palm Valley N	60	125	25			
Mattamy	Reserve at Palm Valley N	70	130	31			3.5 sales / month YTD 2016
Meritage Homes	Vino/Almeria at Sedella	100	145	33			
Mattamy	Estates at Palm Valley N	80	135	48			
AV Homes	Reserve at Litchfield Park	110	150		32		
SCC-Canyon II LLC	Village at Litchfield Park	70	135		29		Investor
Meritage Homes	Sedella Phs 2B	65	130			105	Final Plat Recorded
Meritage Homes	Sedella Phs 2C	90	140			75	Final Plat Recorded
8 Active Subdivision Inventory				236	61	180	477
New Inventory Projected to be Selling Homes in 2015				32	Dec-15	Feb-15	Total Active, Inactive and Future Lot Inventory
Total Lot Inventory				268	305	493	
(Average Net Sales per Month)				20.00	22.5	26.67	
Months Supply of Lot Inventory				13.4	13.6	18.5	
Median Base Home Price				\$337,195	\$328,740	\$317,490	
Net New Build Median Home Price				\$328,865	\$324,390	\$307,990	

Notes: None

FUTURE LOT INVENTORY					
	# Lots	Width	Depth	Owner or Parcel	Project
	0				
Final Plat Approved (UC)	0	TOTAL			
	# Lots	Width	Depth	Owner or Parcel	Project
	98	53	115	MWD / Sunbelt	Windrose
	91	58	115	MWD / Sunbelt	Windrose
	119	65	120	MWD / Sunbelt	Windrose
	119	70	125	MWD / Sunbelt	Windrose
	151	65	130	Parcel 3B	Sedella
	119	75	135	Parcel 3C	Sedella
	63	90	140	Parcel 3A	Sedella
Final Plat Approval Pending	760	TOTAL			
	# Lots	Width	Depth	Owner or Parcel	Project
	113	45	110	MWD / Sunbelt	Windrose
	95	50	120	MWD / Sunbelt	Windrose
	58	53	115	MWD / Sunbelt	Windrose
	116	60	120	MWD / Sunbelt	Windrose
	163	65	130	Parcel 2B	Sedella
	70	75	135	Parcel 2A	Sedella
	75	90	145	Parcel 2C	Sedella
	97	65	130	Parcel 1	Russell Ranch
	72	55	125	Parcel 2	Russell Ranch
	95	55	125	Parcel 3	Russell Ranch
	69	100	135	Parcel 4	Russell Ranch
	191	53	120	Parcels 1 & 5	Arroyo Seco
	113	58	120	Parcel 7	Arroyo Seco
	124	63	120	Parcel 2	Arroyo Seco
	225	68	120	Parcels 3 & 6	Arroyo Seco
	115	73	120	Parcels 3 & 8	Arroyo Seco
	48	90	135	Parcels 4 & 9	Arroyo Seco
	36	120	150	Parcels 4 & 9	Arroyo Seco
Preliminary Plats Approved	1,875	TOTAL			
	# Lots	Acres	% of Supply	Owner	Project
	770	443	49.37%	MWD	Zanjero Trails
	804	321		MWD	Windrose
	1,064	318	33.38%	Sarver / Pollack	Canyon Views
	550	162	17.25%	Cowley	Paloma Vista
Zoning Approved & Vested	3,188	1,244	100.00%	TOTAL	

SOUTH SURPRISE SUB-MARKET: 2016 MARKET ACTIVITY

Mike Schwab | Greg Vogel | 480-483-8100 | www.landadvisors.com



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SOUTH SURPRISE SUB-MARKET							
Finished and Partially Improved Production Lot Inventory (45' - 100' Width) Status							
Updated: 3/7/16 (Belfiore Survey Dates 2/16/16 - 2/25/16)							
Builder or Owner	Subdivision	Lot		Finished		Partially Improved	Comments
		Width	Depth	Active	Inactive		
Richmond American	Cascade at Marley Park	65	120	29			
Mattamy Homes	Estate Series at Marley Park	75	120	19			
Av Homes	Manor Series at Cortessa	53	115	8			
Homes by Towne	Mesquite Trails at Surprise Farms	50	120	50			
Richmond American	Parkside at Greer Ranch	53	115	14			
Courtland Homes	Ironwood at Surprise Farms	80	130	50			6.5 sales / month YTD 2016
Shea Homes	Greer Ranch - Intrigue	58	115	11			5.0 sales / month YTD 2016
Shea Homes	Greer Ranch - Inspire	63	115	134			4.0 sales / month YTD 2016
DMB	Marley Park Parcel 6	90	160		15		Investor / Developer
Shea Homes	Greer Ranch	53	115		95		Builder Inventory
8 Active Subdivision Inventory				315	110	0	425
New Inventory Projected to be Active in 2016				95	Dec-15	Feb-15	Total Finished and Partially Improved Lot Inventory
Total Lot Inventory				410	451	792	
(Avg. Net Sales per Month)				24.8	32.7	33.3	
Months Supply of Lot Inventory				16.5	13.8	23.8	
Median Base Home Price				\$264,490	\$264,990	\$243,740	
Net New Build Median Home Price				\$253,570	\$255,440	\$237,553	

Notes: Av Homes (63' x 115') Estate Series at Cortessa built-out

FUTURE LOT INVENTORY						
	# Lots	Width	Depth	Owner or Parcel	Project	
Under Construction	139	50	115	Elliott Homes	Granite Vista	
Under Construction	74	60	120	Elliott Homes	Granite Vista	
Under Construction	26	70	130	Elliott Homes	Granite Vista	
Final Plat Approved (UC)	239	TOTAL				
	# Lots	Width	Depth	Owner or Parcel	Project	
Under Construction	94	48	120	Ashton Woods	Marley Park	
Under Construction	60	53	120	Ashton Woods	Marley Park	
Under Construction	59	58	120	Ashton Woods	Marley Park	
Under Construction	42	65	120	Ashton Woods	Marley Park	
Under Construction	42	70	120	Ashton Woods	Marley Park	
297 Lots	52	48	120	Parcels 16, 17 & 18	Marley Park	
	64	53	120	Parcels 16, 17 & 18	Marley Park	
	52	58	120	Parcels 15, 16, 17 & 18	Marley Park	
	43	65	120	Parcels 15, 16, 17 & 18	Marley Park	
	37	70	130	Parcels 15, 16 & 18	Marley Park	
Escrow Pending	92	48	115	Parcel 13A	Zanjero Trails- Terrawest	
Escrow Pending	97	53	115	Parcel 12A	Zanjero Trails- Terrawest	
Escrow Pending	121	58	120	Parcel 12B	Zanjero Trails- Terrawest	
310 Lots	118	53	115	Parcel 13C	Zanjero Trails- Terrawest	
	116	75	120	Parcel 12C	Zanjero Trails- Terrawest	
Final Plat Approval Pending	1,089	TOTAL				
	# Lots	Width	Depth	Owner or Parcel	Project	
	145	55	120	Parcel 2	Zanjero Pass	
	131	60	120	Parcel 3	Zanjero Pass	
	138	70	125	Parcel 4	Zanjero Pass	
	77	80	130	Parcel 5	Zanjero Pass	
	179	60	125	Parcel C	Woolf Crossing	
	186	65	130	Parcels D & E	Woolf Crossing	
	202	70	125	Parcels H & J	Woolf Crossing	
	89	85	135	Parcel I	Woolf Crossing	
	120	48	115	Parcel 11C	Zanjero Trails- LS Cactus	
	131	58	120	Parcel 11A	Zanjero Trails- LS Cactus	
	110	68	120	Parcel 11B	Zanjero Trails- LS Cactus	
Preliminary Plats Approved	1,508	TOTAL				
	# Lots	Acres	% of Supply	Owner	Project	
	1,943	615	25.24%	MWD	Zanjero Trails (County)	
	1,357	407		MWD	Zanjero Trails (Surprise)	
	1,083	220	8.28%	DMB	Marley Park	
	6,909	1,600	52.84%	SLR	Prasada Lakes Village	
	1,089	368	8.33%	Elliott Homes	Granite Vista	
	695	390	5.32%	Hinton Financial	White Tank Foothills	
Zoning Approved & Vested	13,076	3,600	100.00%	TOTAL		