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NATIONAL GOLF COURSE OWNERS ASSOCIATION

JAY L. KAREN, CAE
CHIEF EXECUTIVE OFFICER

April 25, 2016

Mr. Doug Little, Commissioner
Arizona Corporate Commission
Docket Control
1200 West Washington
Phoenix, AZ 85007-2996

Arizona Corporation Commission

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Re: Docket # WS-02987A-16-0017

Dear Mr. Little,

On behalf of Swing First Golf, LLC, owner and operator of The Golf Club at Johnson Ranch, the National Golf Course Owners Association (NGCOA) is asking for the Commission to direct Johnson Utilities to reconsider their proposed plan to discontinue providing effluent waters for their golf course irrigation program.

Golf courses were one of the first industries in the United States to partner with local utility companies to redirect effluent waters, which had previously been returned to local streams and waterways. Swing First Golf had a long history of receiving effluent from Johnson Utilities, who recently discontinued their agreement. While Johnson Utilities argues that no formal agreement was in place, we feel their offering continued service to Swing First Golf, and acceptance of their payment at the agreed-upon price, represents an agreement.

As you are aware, most of the southwest portion of our country continues to be challenged with drought conditions. Many water districts have developed incentive programs to encourage water conservation. Both Johnson Utilities and Central Arizona Project 2016 Operating Plans identified the need for water conservation. The proposed plan by Johnson Utilities appears to be in direct conflict with that strategy. NGCOA applauds the communities' efforts to maximize the use of effluent waters by using Water Banking storage facilities. The intent of Water Banking was to provide a means of capturing excess effluent waters and storing vice releasing into local waterways. Swing first Golf has been a receiver of the effluent waters and should Johnson Utilities discontinue this service, then these effluent waters would only become excess.

Johnson Utilities has proposed to switch The Golf Club at Johnson Ranch to a groundwater user. As you know this source of water can also become very scarce, thus requiring the course to use potable waters from the utility company. Not only would this drastically increase their utility cost, it would require an increase in potable water usage.

The NGCOA supports all efforts for water conservation. We ask commissions and regulators like yourself, to apply these strategies fairly and not single out a small business like The Golf Club at Johnson Ranch.

Best wishes,

Jay Karen



NGCOA