

ORIGINAL

OPEN MEETING ITEM



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COMMISSIONERS  
DOUG LITTLE - Chairman  
BOB STUMP  
BOB BURNS  
TOM FORESE  
ANDY TOBIN



ARIZONA CORPORATION COMMISSION

RECEIVED  
AZ CORP COMMISSION  
DOCKET CONTROL

2016 JUN 24 AM 11 05

DATE: JUNE 24, 2016  
DOCKET NO.: W-02271A-16-0037  
TO ALL PARTIES:

Enclosed please find the recommendation of Administrative Law Judge Marc Stern. The recommendation has been filed in the form of an Order on:

GREEN ACRES WATER COMPANY  
(RATES)

Pursuant to A.A.C. R14-3-110(B), you may file exceptions to the recommendation of the Administrative Law Judge by filing an original and thirteen (13) copies of the exceptions with the Commission's Docket Control at the address listed below by 4:00 p.m. on or before:

JULY 5, 2016

The enclosed is NOT an order of the Commission, but a recommendation of the Administrative Law Judge to the Commissioners. Consideration of this matter has tentatively been scheduled for the Commission's Open Meeting to be held on:

JULY 12 AND 13, 2016

For more information, you may contact Docket Control at (602) 542-3477 or the Hearing Division at (602) 542-4250. For information about the Open Meeting, contact the Executive Director's Office at (602) 542-3931.

  
JODI A. JERICH  
EXECUTIVE DIRECTOR

Arizona Corporation Commission  
DOCKETED  
JUN 24 2016

DOCKETED BY 

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

COMMISSIONERS

DOUG LITTLE – Chairman  
BOB STUMP  
BOB BURNS  
TOM FORESE  
ANDY TOBIN

IN THE MATTER OF THE APPLICATION OF  
GREEN ACRES WATER COMPANY FOR  
APPROVAL OF A PERMANENT RATE  
INCREASE.

DOCKET NO. W-02271A-16-0037

DECISION NO. \_\_\_\_\_

ORDER

Open Meeting  
July 12 and 13, 2016  
Phoenix, Arizona

**BY THE COMMISSION:**

On February 1, 2016, Green Acres Water Company (“Applicant” or “Company”) filed with the Arizona Corporation Commission (“Commission”) an application for an increase in its permanent rates and charges.

The Company filed certification with its application for a rate increase that it had mailed with its regular customer billing a notice of its proposed rates and charges to customers of record on February 1, 2016. According to the Staff Report, The Commission has received only one customer comment.

On March 15, 2016, the Commission’s Utilities Division (“Staff”) filed a Notice of Sufficiency for the Company’s rate application, pursuant to Arizona Administrative Code (“A.A.C.”) R14-2-103, and classified the Company as a Class E utility.

On May 16, 2016, Staff filed a Staff Report which recommends approval of Staff’s recommended rates and charges.

\* \* \* \* \*

Having considered the entire record herein and being fully advised in the premises, the Commission finds, concludes, and orders that:

FINDINGS OF FACT

1. Pursuant to authority granted by the Commission in Decision No. 46192 (June 3, 1975)

1 the Company is an Arizona Class E utility that provides potable service to approximately 56 customers  
2 in a small community in Yuma County, Arizona.<sup>1</sup>

3 2. Currently, the Company is operated by an interim manager, Ms. Nancy Miller of  
4 Sunstate Environmental Services located in Yuma, Arizona. In Decision No. 73931 (June 27, 2013),  
5 the Commission authorized Staff to obtain and retain an interim manager to operate the Company if  
6 Staff determined that the appointment of an interim manager would be in the public interest.  
7 Subsequently, the Commission, in Decision No. 74234 (December 31, 2013), found that the apparent  
8 owner of the Company, Mr. Todd Brandenberger, was not operating the Applicant in a manner which  
9 would “preserve the health and safety of the customers of Green Acres,” and that he had threatened to  
10 discontinue water service. The Commission ordered the Company to cooperate with the interim  
11 manager whose position was authorized in Decision No. 74234. Further, the Commission enjoined  
12 Mr. Brandenburger from interfering with the operation of the Company’s facilities by the interim  
13 manager.

14 3. On November 13, 2014, the Commission issued Decision No. 74824, which approved  
15 emergency rates so that the Company could continue to operate, and also authorized a repair surcharge  
16 to enable the interim manager to make needed system upgrades and repairs.<sup>2</sup>

17 4. On March 25, 2016, the Commission issued Decision No. 75490 which amended  
18 Decision No. 74824 in order to provide the Company with greater flexibility to expend the funds  
19 collected through the emergency surcharge, in order to restore the provision of adequate water service.

20 5. On February 1, 2016, the Company filed an application requesting authority to increase  
21 its permanent rates and charges for water service.

22 6. On February 26, 2016, Staff issued a Notice of Deficiency to the Company with respect  
23 to its application.

24 7. On March 15, 2016, Staff issued a Notice of Sufficiency and classified the Company as  
25 a Class E Utility.

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26 <sup>1</sup> The Company’s Certificate of Convenience and Necessity (“CC&N”) was awarded to two partners, Melvin and Eugene  
27 Swenson dba Green Acres Water Co. Their CC&N was revoked by Decision No. 72239 (December 13, 2010) for failure  
to file numerous annual reports.

28 <sup>2</sup> Other than the emergency rates, the Company has not had a permanent rate increase since its initial rates and charges were  
authorized in 1975.

1           8.       The Company filed certification with its application that it had provided public notice  
2 to its customers of its proposed rates and charges by mailing the notice with its customers' regular  
3 monthly bills.

4           9.       During the test year ending December 31, 2014 ("TY"), Applicant served approximately  
5 56 customers, all by 5/8-inch by 3/4-inch meters.

6           10.      Average and median usage of water for customers during the TY were 13,200 and 9,360  
7 gallons per month, respectively.

8           11.      On May 16, 2016, Staff filed its Staff Report in response to the Company's rate request  
9 after conducting an analysis of the Applicant's proposed rates and charges for water service. Staff  
10 recommended that the Commission issue a decision which approves Staff's proposed rates and charges.

11          12.      The Company did not file any objections to Staff's recommendations contained in the  
12 Staff Report.

13          13.      Pursuant to the Staff Report, Staff found that Applicant's fair value rate base ("FVRB")  
14 is \$12,137, which is the same as its original cost rate base.<sup>3</sup>

15          14.      Staff made nine adjustments to operating income, increasing the Company's proposed  
16 total TY operating income by \$7,270, from \$3,475 to \$10,745.

17          15.      The water rates and charges for the Company at present, and as recommended by Staff,  
18 are as follows:

<u>MONTHLY USAGE CHARGE:</u>	Present	Proposed Rates	
	Rates	Company	Staff
5/8" x 3/4" Meter	\$17.50	\$34.69 <sup>4</sup>	\$34.69
3/4" Meter	N/T	N/T	34.69
1" Meter	N/T	N/T	86.73
1 1/2" Meter	N/T	N/T	173.45
2" Meter	N/T	N/T	277.52
3" Meter	N/T	N/T	555.04
4" Meter	N/T	N/T	867.25
6" Meter	N/T	N/T	1,734.50

26 <sup>3</sup> Staff made two adjustments to the Company's proposed rate base and these minor adjustments resulted in a cash working  
27 capital allowance of \$2,422, when using the formula method and added to the net plant of \$9,940 recognized by both the  
Company and Staff.

28 <sup>4</sup> The Company proposed combining its minimum monthly charge for a 5/8-inch x 3/4-inch" meter of \$17.50 with the repair  
surcharge of \$17.19 authorized in Decision No. 74824.

1	Construction, per 1,000 gallons	N/T	N/T	2.00
	Bulk Water pipe per 1,000 gallons	N/T	N/T	2.00
2	Gallons included in minimum	0	0	0
3	Repair Surcharge	\$17.19	-	-
4	<b><u>COMMODITY RATE CHARGE:</u></b>			
5	5/8" x 3/4" Meter			
6	0 to 3,000 gallons	\$1.00	\$1.00	\$1.00
7	Over 3,000 gallons	2.00	2.00	2.00
8	3/4" Meter			
9	0 to 3,000 gallons	1.00	1.00	1.00
	Over 3,000 gallons	2.00	2.00	2.00
10	1" Meter			
11	All Gallons	N/T	N/T	2.00
12	1 1/2" Meter			
	All Gallons	N/T	N/T	2.00
13	2" Meter			
14	All Gallons	N/T	N/T	2.00
15	3" Meter			
16	All Gallons	N/T	N/T	2.00
17	4" Meter			
18	All Gallons	N/T	N/T	2.00
19	6" Meter			
	All Gallons	N/T	N/T	2.00
20	Bulk Water per 1,000 Gallons			2.00
21	Construction per 1,000 Gallons			2.00
22	Standpipe per 1,000 Gallons			2.00

**SERVICE LINE AND METER INSTALLATION CHARGES:**

(Refundable pursuant to A.A.C. R14-2-405)

	<u>Present</u>			<u>Company Proposed</u>			<u>Staff Recommended</u>			
	<u>Service Line</u>	<u>Installation Charges</u>	<u>Total</u>	<u>Service Line</u>	<u>Installation Charges</u>	<u>Total</u>	<u>Service Line</u>	<u>Installation Charges</u>	<u>Total</u>	
25	5/8" x 3/4" Meter	N/A	N/A	\$100	N/A	N/A	\$100	\$80	20	100
26	3/4" Meter	N/A	N/A	120	N/A	N/A	120	80	40	120
	1" Meter	N/A	N/A	160	N/A	N/A	160	100	60	160
27	1 1/2" Meter	N/A	N/A	300	N/A	N/A	300	160	140	300
	2" Meter	N/A	N/A	400	N/A	N/A	400	180	220	400
28	3" Meter	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

4" Meter	N/A								
6" Meter	N/A								

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<u>SERVICE CHARGES:</u>	<u>Present Rates</u>	<u>Proposed Charges</u>	
		<u>Company</u>	<u>Staff</u>
Establishment	\$20.00	\$30.00	\$20.00
Establishment (After Hours)	N/T	N/T	N/T
Reconnection (Delinquent)	\$5.00	\$30.00	\$20.00
Meter Test (If Correct)	25.00	25.00	25.00
Deposit	75.00	75.00	75.00
Deposit Interest	*	*	*
Reestablishment (Within 12 Months)	\$25.00	**	**
NSF Check	N/T	\$30.00	\$15.00
Deferred Payment	1.50%	1.50%	1.50%
Meter Reread (If Correct)	\$2.50	\$15.00	\$15.00
Late Fee	1.50%	1.50%	1.50%
After Hours Service Charge	N/T	\$30.00	\$30.00
<u>Monthly Service Charge for Fire Sprinklers:</u>			
4" or Smaller	***		***
6"	***		***
8"	***		***
10"	***		***
Larger than 10"	***		***

\* Per Commission rule A.A.C. R-14-2-403(B).  
 \*\* Months off system times the monthly minimum per Commission Rule A.A.C. R14-2-403(D).  
 \*\*\* 2% of Monthly Minimum for a comparable size meter connection, but no less than \$10.00 per month. The service charge for fire sprinklers is only applicable for service lines separate and distinct from the primary water service line.

16. As a result of Decision No. 74824, the Company's emergency rates went into effect in January 2015. The Company was also ordered to file an application for permanent rates using a test year ending December 31, 2014. However, revenue collected with the emergency rates was not included in the Company's calculations for its TY, and the Company did not provide pro-forma adjustments in its filing. Staff made TY pro-forma adjustments to revenue and expenses, and also included expenditures from the surcharge authorized in Decision No. 74824, and treated them as adjusted TY expenses.

17. According to the Staff Report, Applicant's present water rates and charges produced adjusted operating revenues of \$24,619, which does not include unmetered water revenue of \$380 or \$10,314 collected during 2015 for the Company's surcharge. Adding the unmetered water and

1 surcharge revenues would result in a total of \$35,313 in TY operating revenue.

2 18. With respect to the Company's TY operating expenses, Staff increased Applicant's TY  
3 operating expenses by \$9,960 primarily due to the following adjustments: \$1,200 for purchased power;  
4 \$3,216 for repairs and maintenance; \$2,509 for outside services; \$305 for water testing; \$641 for  
5 property tax; \$2,632 for income tax; and removed \$543 for office supplies and reclassified it as part of  
6 outside services.

7 19. The Company's present water rates and charges produced adjusted expenses of \$24,568,  
8 which resulted in a TY operating income of \$10,745.

9 20. The Company initially proposed operating revenues of \$23,312 over TY operating  
10 revenues of \$18,083, a \$5,229 increase over TY revenue, which would provide \$8,704 in operating  
11 income. However, the Company amended its application on April 4, 2016, and proposed combining  
12 the current emergency monthly minimum bill of \$17.50 with the repair surcharge of \$17.19, authorized  
13 in Decision No. 74824, for a new monthly minimum of \$34.69, which Applicant projected would  
14 generate revenues of \$35,313.

15 21. The water rates and charges Staff recommended are identical to the Applicant's since  
16 Staff also combined the Company's current monthly minimum charge of \$17.50 with the repair  
17 surcharge of \$17.19, resulting in a recommended monthly minimum bill of \$34.69 for residential  
18 customers.

19 22. According to the Staff Report, neither the Company's proposed rates nor Staff's  
20 recommended rates would increase the current average usage (13,200 gallons) monthly customer water  
21 bill, which would remain at \$58.09, and the median monthly customer water bill (9,360 gallons) would  
22 remain at \$50.41.

23 23. According to the Staff Report, while there has been some question of Mr.  
24 Brandenberger's ownership interest, Staff located and attached a joint tenancy deed to its report that  
25 was executed by Mr. Melvin J. Swenson ("grantor"), who was a co-partner in the Company when it  
26 was awarded a CC&N in Decision No. 46192.

27 24. The joint tenancy deed attached to the Staff Report appears to transfer the real property,  
28 and certain improvements thereon, owned by the Company to Todd Brandenberger, Aurora

1 Brandenberger, Manuel Glaze and Olga Glaze (“grantees”).

2 25. There is no evidence that the disposition of the Company’s assets was approved by the  
3 Commission pursuant to A.R.S. § 40-285.

4 26. Staff believes that continuing the management of the Company by the interim manager  
5 will best serve the customers who are working towards a solution for the Company to connect to a  
6 municipal water system.

7 27. According to the Staff Report, through May 2, 2016, six complaints have been filed  
8 against the Company as follows: in 2013, 2 complaints for quality of service; in 2014, no complaints;  
9 in 2015, 4 complaints involving quality of service, defective equipment and service not working; and  
10 2016, zero complaints through May 2. Staff indicates that all complaints have been resolved and closed  
11 and only one opinion was received in opposition to the rate case.

12 28. According to Staff, a check of the compliance section database showed that there are no  
13 delinquent Commission compliance items for the Company. Staff states that there is one area of  
14 concern with respect to the lack of a Letter of Good Standing from the Arizona Department of Revenue  
15 (“ADOR”) which the Company lacks, and Staff is recommending that the Company resolve any  
16 delinquent filings.

17 29. An inspection of the Company’s system was conducted by a Staff Engineer on March  
18 16, 2016, and it was determined that the Applicant has an approved Backflow Prevention Tariff and  
19 also an approved Curtailment Tariff on file with the Commission. However, according to the Staff  
20 Report, ADEQ has reported that the Company’s water system has monitoring, reporting, operation and  
21 maintenance deficiencies, and as a result, ADEQ cannot determine if the Company is currently  
22 delivering water that meets the water quality standards required by 40 C.F.R.141 (National Primary  
23 Drinking Water Regulations) and A.A.C. Title 18, Chapter 4.

24 30. Staff has further determined that the Company’s system has adequate water production  
25 capacity to serve its present customer base at a reasonable level of growth, and that the Company’s  
26 second well should alleviate the need for a new storage tank.

27 31. Staff is also recommending that the Commission order the following:

28 • that the rates and charges recommended by Staff be approved;

- 1 • that the Company file with the Commission's Docket Control, as a compliance
- 2 item in this docket, a Certificate of Compliance Letter of Good Standing issued by
- 3 ADOR;
- 4 • that the Company, in addition to the collection of its regular rates and charges
- 5 be authorized to collect from its customers the proportionate share of any privilege, sales
- 6 or use tax, per A.A.C. R14-2-409(D)(5);
- 7 • that the Company file, with the Commission's Docket Control, a schedule of its
- 8 approved rates of charges within 30 days of the effective date of this Decision;
- 9 • that the Company utilize the depreciation rates shown in Table B of the
- 10 Engineering Report attached to the Staff Report;
- 11 • that the Company, as a compliance item in this proceeding, notify its customers
- 12 of the authorized rates and charges approved in this proceeding, and their effective date,
- 13 in a form acceptable to Staff, by means of an insert in its next regular scheduled billing
- 14 and to file copies with the Commission's Docket Control within 10 days of the date
- 15 notice is sent to its customers;
- 16 • that the Company file, with the Commission's Docket Control, as a compliance
- 17 item in this docket by May 31, 2017, documentation from ADEQ indicating that there
- 18 are no compliance deficiencies and the Company's water system is delivering water that
- 19 meets the water quality standards required by 40 C.F.R.141 (National Primary Drinking
- 20 water Regulations) and A.A.C., Title 18, Chapter 4, or a signed consent agreement with
- 21 ADEQ demonstrating a plan to reach compliance;
- 22 • that the Company coordinate the reading of its well meters and individual
- 23 customer meters on a monthly basis and report this data in its Commission Annual
- 24 Reports going forward (the Company shall collect the data needed to accurately
- 25 complete the water use data sheets contained in the Annual Report form); and
- 26 • that the Company continue to monitor the water system water losses and repair
- 27 all leaks when discovered and located.

28 32. Because an allowance for property tax expense of Applicant is included in the

1 Company's rates and will be collected from its customers, the Commission seeks assurances from the  
2 Company that any taxes from ratepayers have been remitted to the appropriate taxing authority. It has  
3 come to the Commission's attention that a number of water companies have been unwilling or unable  
4 to fulfill their obligations to pay the taxes that were collected from ratepayers, some for as many as  
5 twenty years. It is reasonable, therefore, that as a preventative measure, the Company shall file, as part  
6 of its Annual Report, an affidavit with the Utilities Division attesting that the Company is current in  
7 paying its property taxes in Arizona.

8 33. Following a review of the application and Staff Report, we believe that Staff's proposed  
9 rates and charges are reasonable and should be adopted together with Staff's additional  
10 recommendations. Further, due to the ownership issues which involve the Company, Staff should file  
11 in this docket, within 90 days of the effective date of this Decision, any possible recommendations  
12 which resolve these issues to insure continued service to the customers until a final resolution is reached  
13 including the disposition of the Company's assets pursuant to A.R.S. § 40-285.

#### 14 CONCLUSIONS OF LAW

15 1. The Company is a public service corporation within the meaning of Article XV of the  
16 Arizona Constitution and A.R.S. §§ 40-250 and 40-251.

17 2. The Commission has jurisdiction over Applicant and of the subject matter of the  
18 application.

19 3. Notice of the application was provided in the manner prescribed by law.

20 4. Under the circumstances discussed herein, the rates and charges for the Company as  
21 authorized hereinafter are just and reasonable and should be approved.

22 5. Staff's recommendations, in Findings of Fact No. 31 are reasonable and should be  
23 adopted.

24 6. Staff should file in this docket, within 90 days of the effective date of this Decision, any  
25 possible recommendations which resolve the ownership issues to insure continued service to the  
26 customers until a final resolution is reached including the disposition of the Company's assets pursuant  
27 to A.R.S. § 40-285.

28 ...

**ORDER**

IT IS THEREFORE ORDERED that Green Acres Water Company is hereby directed to file with the Commission's Docket Control, as a compliance item in this docket, on or before August 1, 2016, revised rate schedules setting forth the following rates and charges:

**MONTHLY USAGE CHARGE:**

5/8" x 3/4" Meter	\$34.69
3/4" Meter	34.69
1" Meter	86.73
1 1/2" Meter	173.45
2" Meter	277.52
3" Meter	555.04
4" Meter	867.25
6" Meter	1,734.50
Construction, per 1,000 gallons	2.00
Bulk Water pipe per 1,000 gallons	2.00
Gallons included in minimum	0

**COMMODITY RATE CHARGE:**

5/8" x 3/4" Meter	
Tier 1 – 0 to 3,000 gallons	\$1.00
Tier 2 – Over 3,000 gallons	2.00
3/4" Meter	
Tier 1 – 0 to 3,000 gallons	1.00
Tier 2 – Over 3,000 gallons	2.00
1" Meter	
All Gallons	2.00
1 1/2" Meter	
All Gallons	2.00
2" Meter	
All Gallons	2.00
3" Meter	
All Gallons	2.00
4" Meter	
All Gallons	2.00
6" Meter	
All Gallons	2.00

1	Bulk Water All Gallons	2.00
	Construction All Gallons	2.00
2	Standpipe All Gallons	2.00

3 **SERVICE LINE AND METER INSTALLATION CHARGES:**  
4 **(Refundable pursuant to A.A.C. R14-2-40-5)**

	Service Line	Installation	
	<u>Charges</u>	<u>Charges</u>	<u>Total</u>
5			
6	5/8" x 3/4" Meter	\$80	\$20
	3/4" Meter	80	40
7	1" Meter	100	60
	1 1/2" Meter	160	140
8	2" Meter	180	220
	3" Meter	N/A	N/A
9	4" Meter	N/A	N/A
10	6" Meter	N/A	N/A

11 **SERVICE CHARGES:**

12	Establishment	\$20.00
13	Establishment (After Hours)	N/T
	Reconnection (Delinquent)	\$20.00
14	Meter Test (If Correct)	25.00
	Deposit	75.00
15	Deposit Interest	*
	Reestablishment (Within 12 Months)	**
16	NSF Check	\$15.00
17	Deferred Payment	1.50%
	Meter Reread (If Correct)	\$15.00
18	Late Fee	1.50%
19	After Hours Service Charge	\$30.00

20 **Monthly Service Charge for Fire Sprinklers:**

20	4" or Smaller	***
21	6"	***
	8"	***
22	10"	***
23	Larger than 10"	***

24 \* Per Commission rule A.A.C. R-14-2-403(B).

25 \*\* Months off system times the monthly minimum per Commission Rule A.A.C. R14-2-403(D).

26 \*\*\* 2% of Monthly Minimum for a comparable size meter connection, but no less than \$10.00 per month.  
The service charge for fire sprinklers is only applicable for service lines separate and distinct from the primary water service line.

27 IT IS FURTHER ORDERED that Green Acres Water Company shall notify its customers of

28

1 the water rates and charges authorized hereinafter, and the effective date of same, by means of an insert,  
2 in a form acceptable to Staff, in the regular monthly billing which precedes the month in which the  
3 rates are to become effective and file copies of the notice when sent to its customers with the  
4 Commission's Docket Control, as a compliance item in this docket.

5 IT IS FURTHER ORDERED that Green Acres Water Company shall comply with each of the  
6 recommendations which appear in Findings of Fact No. 31.

7 IT IS FURTHER ORDERED that Green Acres Water Company, in addition to the collection  
8 of its regular rates and charges, shall collect from its customers their proportionate share of any  
9 privilege, sales or use tax, as provided in A.A.C. R14-2-409(D)(5).

10 IT IS FURTHER ORDERED that Staff shall file in this docket, within 90 days of the effective  
11 date of this Decision, any possible recommendations which resolve the ownership issues to insure  
12 continued service to the customers until a final resolution is reached including the disposition of the  
13 Company's assets pursuant to A.R.S. § 40-285.

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1 IT IS FURTHER ORDERED that Green Acres Water Company shall annually file, as part of  
2 its Annual Report, an affidavit with the Utilities Division attesting that the Company is current in  
3 paying its property taxes in Arizona.

4 IT IS FURTHER ORDERED that this Decision shall become effective immediately.

5 BY ORDER OF THE ARIZONA CORPORATION COMMISSION.  
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8 CHAIRMAN \_\_\_\_\_ COMMISSIONER

9  
10 COMMISSIONER \_\_\_\_\_ COMMISSIONER \_\_\_\_\_ COMMISSIONER

11  
12 IN WITNESS WHEREOF, I, JODI JERICH, Executive Director  
13 of the Arizona Corporation Commission, have hereunto set my  
14 hand and caused the official seal of the Commission to be affixed  
15 at the Capitol, in the City of Phoenix, this \_\_\_\_\_ day  
16 of \_\_\_\_\_ 2016.

17 \_\_\_\_\_  
18 JODI JERICH  
19 EXECUTIVE DIRECTOR

20 DISSENT \_\_\_\_\_

21 DISSENT \_\_\_\_\_  
22 MS:rt

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1 SERVICE LIST FOR:

GREEN ACRES WATER COMPANY

2 DOCKET NO.:

W-02271A-16-0037

3 Nancy Miller, Interim Manager  
4 For Green Acres Water Company  
5 Sun State Environmental Services  
6 4743 E. 30<sup>th</sup> Place  
7 Yuma, AZ 85365

8 Janice Alward Chief Counsel  
9 Legal Division  
10 ARIZONA CORPORATION COMMISSION  
11 1200 West Washington Street  
12 Phoenix, Arizona 85007

13 Thomas Broderick, Director  
14 Utilities Division  
15 ARIZONA CORPORATION COMMISSION  
16 1200 West Washington Street  
17 Phoenix, Arizona 85007

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