

COMMISSIONERS
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0000171294

ORIGINAL

ARIZONA CORPORATION COMMISSION

RECEIVED

2016 JUN 27 P 1:03

AZ CORP COMMISSION
DOCKET CONTROL

June 24, 2016

To: Docket Control

RE: EPCOR Water (Wastewater) – Customer Comments

Docket No. WS-01303A-16-0145

Please docket the attached 17 customer comments IN FAVOR of the above filed case.

Customer comments can be reviewed in E-docket under the above docket number.

Filed by: Utilities Division – Consumer Services

Arizona Corporation Commission
DOCKETED

JUN 27 2016

DOCKETED BY *YKC*

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132509 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 11:22 AM

First Name: John **Last Name:** Shields **Account Name:** John Shields
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

To Whom it may concern, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

Investigation			
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Web Submission	Investigation

Comments noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132531 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 4:41 PM

First Name: Mary **Last Name:** Keyes **Account Name:** Mary Keyes
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Home: <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145 **Docket Position:** For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

Investigation			
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Telephone	Investigation

Comments noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132532 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 4:42 PM

First Name: Timothy **Last Name:** Crump **Account Name:** Timothy Crump
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

Investigation			
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Telephone	Investigation

Comments noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132518 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 1:10 PM

First Name: James **Last Name:** Alsup Jr **Account Name:** James Alsup Jr
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145 **Docket Position:** For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

Investigation			
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Telephone	Investigation

Comment noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132520 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 1:14 PM

First Name: Lyndsey **Last Name:** Bacon **Account Name:** Lyndsey Bacon
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145 **Docket Position:** For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

Investigation			
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Telephone	Investigation

Comment noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132521 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 1:14 PM

First Name: Amy **Last Name:** Barko **Account Name:** Amy Barko
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months

		Investigation	
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Telephone	Investigation

Comment noted for the record and docketed. CLOSED

WS-01303A-16-0145

Arizona Corporation Commission Utilities Complaint Form

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132525 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 1:24 PM

First Name: Kevin **Last Name:** Barko **Account Name:** Kevin Barko
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months

Investigation

Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Telephone	Investigation

Comments noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132516 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 1:09 PM

First Name: Thomas **Last Name:** Brown **Account Name:** Thomas Brown
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Home: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

Investigation

Date: 6/23/2016 **Analyst:** Mary Mee **Submitted By:** Web Submission **Type:** Investigation

Comment noted for the record and docketed. CLOSED

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132524 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 1:23 PM

First Name: Nick **Last Name:** Gehrts **Account Name:** Nick Gehrts
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145 **Docket Position:** For

The EPCOR Wastewater Case is beginning to heat up. Public sentiment is an important factor in influencing the Commission. Please take a few minutes to share your voice. Just follow these steps. Copy the text below (or, if you prefer, write your own) Open the Public Comment Form page for the ACC Put in your details Put in the case number: WS-01303A-16-0145 Make sure you select "FOR" - meaning you support the company's position Paste the text in the comment section Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

Date:	Analyst:	Investigation	Submitted By:	Type:
6/23/2016	Mary Mee	Telephone		Investigation

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Comments noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee Phone: <<< REDACTED >>> Opinion Date: 6/23/2016
Opinion Number: 2016 - 132514 Priority: Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor Closed Date: 6/23/2016 1:08 PM

First Name: Jeremy Last Name: Hedges Account Name: Jeremy Hedges
Address: <<< REDACTED >>>
City: Buckeye State: AZ Zip Code: 85396
Cell: <<< REDACTED >>> Email: <<< REDACTED >>>

Company: EPCOR Sewer *AAWC Division: Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months. Sincerely Jeremy Hedges

Investigation			
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Web Submission	Investigation

Comment noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132513 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 1:32 PM

First Name: Mary Ann **Last Name:** Hughes **Account Name:** Mary Ann Hughes
Address: <<< REDACTED >>>
City: SUN CITY **State:** AZ **Zip Code:** 85373
Home: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145 **Docket Position:** For

Dear Commissioners, As a resident of a community in the Agua Fria wastewater district, we want the record to show our unconditional support for full consolidation of the EPCOR waste water districts. It is a fair and equitable solution to a major discriminatory and economic problem which has been plaguing our communities for many, many years. Full consolidation treats all consumers on an equal basis, is economically viable to all parties and is acceptable to the utility company, EPCOR. We regret that some consumers may see an increase but all consumers will be treated the same and uniformity and fairness is paramount. Please support full consolidation as requested by EPCOR. Thank you in advance.

Investigation			
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Telephone	Investigation

Comments noted for the record and docketed. CLOSED

WS-01303A-16-0145

Arizona Corporation Commission Utilities Complaint Form

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132512 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 1:05 PM

First Name: Michael **Last Name:** Neu **Account Name:** Michael Neu
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

		Investigation	
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Web Submission	Investigation

Comment noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee Phone: <<< REDACTED >>> Opinion Date: 6/23/2016
Opinion Number: 2016 - 132503 Priority: Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor Closed Date: 6/23/2016 11:07 AM

First Name: Robert Last Name: Pollard Account Name: Robert Pollard
Address: <<< REDACTED >>>
City: Buckeye State: AZ Zip Code: 85396
Cell: <<< REDACTED >>>

Company: EPCOR Sewer *AAWC Division: Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145 Docket Position: For

To whom it may concern, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

Investigation			
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Web Submission	Investigation

Comments noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132526 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 1:50 PM

First Name: Chris **Last Name:** Rankin **Account Name:** Chris Rankin
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>> **Cell:** <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

		Investigation	
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Telephone	Investigation

Comments noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132502 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 11:05 AM

First Name: Michelle **Last Name:** Sympson **Account Name:** Michelle Sympson
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months. Michelle Sympson

Investigation			
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Web Submission	Investigation

Comments noted for the record and docketed. CLOSED

WS-01303A-16-0145

Arizona Corporation Commission Utilities Complaint Form

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132506 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 11:11 AM

First Name: Doug **Last Name:** Swoveland **Account Name:** Doug Swoveland
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

		Investigation	
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Web Submission	Investigation

Comments noted for the record and docketed. CLOSED

WS-01303A-16-0145

**Arizona Corporation Commission
Utilities Complaint Form**

Investigator: Mary Mee **Phone:** <<< REDACTED >>> **Opinion Date:** 6/23/2016
Opinion Number: 2016 - 132504 **Priority:** Respond within 5 business days
Opinion Codes: Rate Case Items - Consolidation In Favor **Closed Date:** 6/23/2016 11:08 AM

First Name: Suzan **Last Name:** Swoveland **Account Name:** Suzan Swoveland
Address: <<< REDACTED >>>
City: Buckeye **State:** AZ **Zip Code:** 85396
Cell: <<< REDACTED >>> **Email:** <<< REDACTED >>>

Company: EPCOR Sewer *AAWC **Division:** Sewer

Nature Of Opinion

Docket Number: WS-01303A-16-0145

Docket Position: For

Dear Sirs, I am a resident of Verrado in Buckeye and a customer of EPCOR. I am writing to strongly encourage you to decide in FAVOR of FULL CONSOLIDATION in the rate case referenced above. Opponents of consolidation say their infrastructure is already paid for. But no infrastructure is ever paid in full. It has continuing value and requires continuing capital to maintain essential service. Opponents also say they shouldn't be forced to subsidize new communities. They would not. In fact, across many categories, EPCOR's expenses are allocated to Sun City customers at a significantly reduced rate, per capita. It is the unused capacity of certain facilities, intended for future growth, that makes these districts over-priced. That's not customers causing the cost, it's the company's investment in the future. Those burdens should have always been shouldered equally by all customers as a cost of doing business. Opponents say that consolidation has been rejected. But consolidated pricing is the standard practice in Agua Fria and has been through multiple expansions for almost 15 years, all without objection by the Commission or any other party. The truth is, those opposed to consolidation have not made their case based on the facts, but rather this simple universal truth: nobody wants their bill to go up. This is understandable, but not, in itself, justification for a policy decision by state regulators. Sun City objects to a potential increase of \$20, but Agua Fria customers have been made to absorb \$50 fluctuations in previous decisions, and are currently paying at 180% of the market rate for wastewater service. We are all on fixed incomes, when it comes down to it. Previous Commissions failed to address this issue in 2001, when Arizona American first acquired Citizens Water companies. The moment those different subsidiary companies were consolidated under one corporate umbrella, they ceased to be separate rate bases and became customer classes. The Arizona Constitution forbids customer classes (rates) being based solely on location. This oversight, along with subsequent decisions, have created friction, frustration, and hardship for more than 10 years. It must be resolved. We are sensitive to the needs of those whose bills would increase, and are open to gradually implementing the change. But schedules, rating factors, and discounts should begin with a consolidated, universal rate. That means FULL CONSOLIDATION for all EPCOR wastewater customers. Thank you for your kind attention to this matter. We look forward to seeing all parties progress toward a solution in the coming months.

Investigation			
Date:	Analyst:	Submitted By:	Type:
6/23/2016	Mary Mee	Web Submission	Investigation

Comments noted for the record and docketed. CLOSED
