

ORIGINAL



Before the Arizona Corporation Commission

Commissioners

Doug Little, Chairman  
Bob Stump  
Bob Burns  
Tom Forese  
Andy Tobin

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AZ CORP COMMISSION  
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2016 SEP 8 PM 3 00

In the matter of the application of Epcor Water Arizona Inc. ) Docket No. WS-01303A-16-0145  
for a determination of the current fair value of its utility )  
plant and property and for increases/decreases in its rates )  
and charges based thereon for utility services by its )  
Agua Fria, Anthem, Mohave, Sun City, and Sun City West )  
wastewater districts and for consideration of consolidation )  
and deconsolidation proposals. )

This filing is in response to Epcor's submission on September 2, 2016.

To make it easier for Epcor to respond to my concerns, please will the judge appointed to this case, Sarah N. Harpring, instruct Epcor to answer each of my questions below.

Respectfully submitted on September 6, 2016.

Frederick G. Botha

Arizona Corporation Commission

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Question 1

Since December, 2015, on how many occasions have Epcor met with me to discuss the information provided by Epcor for this case?

Question 2

How many of these occasions have been spent discussing Epcor's approach to the information provided?

Question 3

How many occasions have been spent discussing the information I require as a consumer and an intervenor in this case?

Question 4

As a consumer and intervenor in this case, am I entitled to specify to Epcor and RUCO the information I require for the case?

If not, why not?

Question 5

If so, when will I be given such an opportunity to ensure that the information I require can be provided in time for this case by Epcor?

Question 6

On three previous occasions in December, 2015, and January, 2016, why did Epcor refuse to meet to discuss the information I require and instead recommend postponing any such discussions - instead of taking advantage of these opportunities to check my requirements and, if necessary, to resolve any potential issues?

Question 7

In my data request of August 25, 2016, I did not ask for the brochure, after it was carefully pointed out to me by Epcor that such a brochure was not required by the Commission.

Why is this relevant in Epcor's response to my data request of August 25, 2016, when it was no longer included as a requirement, even though it would have been so helpful to consumers?

Question 8

Since the determining factor in the protest and petition initiating this case by Diane Smith and Agua Fria consumers was the high combined total costs of both water and wastewater, how will the 2015 test year figures provided by Epcor assist consumers in evaluating the proposed consolidation/deconsolidation options in terms of their future estimated total costs through 2026 including the proposed capital equipment upgrades?

Question 9

What estimates can be made from the costs of wastewater in the 2015 test year about future total costs of both water and wastewater for the years through to 2026 after capital equipment upgrades are installed?

Question 10

Are Epcor suggesting that consumers use their own minimal data and computing resources to provide future cost estimates solely because the variables are too difficult to estimate?

Or are there other reasons? If so, what are these reasons?

Question 11

Since no estimates of future variables in any forecast are expected to be accurate, if consumers are willing to accept Epcor's best estimates, are Epcor prepared to provide the required figures through 2026?

If not, why not?

Question 12

If Epcor are prepared to forecast the variables associated with their own capital plant upgrades through 2026, why are they not prepared to accept similar variables in forecasting total water and wastewater costs?

Question 13

At a recent meeting held at Corte Bella to discuss the results of the test year 2015 and to update residents on their options, I asked Shawn Bradford, a senior executive at Epcor, if Epcor would provide the far more valuable total future water and wastewater costs and he said that Epcor would see what they could do.

Does this offer still hold?

If not, why not?

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