

ORIGINAL

OPEN MEETING



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TO: THE COMMISSION

Arizona Corporation Commission

FROM: Utilities Division

DOCKETED

DATE: March 8, 2018

MAR 8 2018

RE: IN THE MATTER OF THE COMMISSION'S INVESTIGATION OF THE BILLING AND WATER QUALITY ISSUES OF JOHNSON UTILITIES, LLC. (DOCKET NO. WS-02987A-18-0050)

DOCKETED BY

**INTRODUCTION**

Enclosed are the Commission Staff's memorandum and proposed order for In the matter of the Commission's investigation of the billing and water quality issues of Johnson Utilities, LLC. This is only a Staff recommendation to the Commission; it has not yet become an order of the Commission. The Commission can decide to accept, amend or reject Staff's proposed order.

You may file comments to the recommendation(s) of the proposed order by filing an original and thirteen (13) copies of the comments with the Commission's Docket Control Center at 1200 W. Washington St., Phoenix, AZ 85007 by 4:00 p.m. on or before March 12, 2018.

This matter may be scheduled for Commission deliberation at its Open Meetings scheduled **March 13, 2018**, at 10:00 a.m. and **March 14, 2018**, at 10:00 a.m.

If you have any questions about this matter, please contact Andrew Smith of our Staff at (602) 542-0763, or Elijah Abinah, Director, at (602) 542-6935.

**BACKGROUND**

On February 20<sup>th</sup> and 21<sup>st</sup>, 2018, the Arizona Corporation Commission held public comment meetings in San Tan Valley regarding the Johnson Utilities Request for Rate Increase to Water and Wastewater Services (Docket No. WS-08987A-17-0392). As a result of the public comments, Chairman Forese directed Staff to open a docket to address the water quality and bill complaints associated with Johnson Utilities. At the Commission's February 22, 2018 Staff Open Meeting, the Commission directed Staff to conduct a site inspection and water/wastewater sampling of Johnson Utilities and prepare a report to bring before the Commission at its March Open Meeting.

## **DESCRIPTION OF THE WATER & WASTEWATER SYSTEM**

### Johnson Wastewater System

Johnson Utilities operates four active wastewater systems, namely: Section 11, San Tan, Pecan and Anthem. The Section 11 Wastewater Treatment Plant is permitted to treat a maximum monthly average of 1.6 Million Gallons per Day ("MGD") under Arizona Department of Environmental Quality ("ADEQ") Aquifer Protection Permit ("APP") 103081. The San Tan Water Reclamation Plant is permitted to treat a maximum monthly average of 2.0 MGD under ADEQ APP 105325. The Pecan Water Reclamation Plant is permitted to treat a maximum monthly average of 2.0 MGD under ADEQ APP 105324. The Anthem Water Reclamation Plant is permitted to treat a maximum monthly average of 1.5 MGD under ADEQ APP 105646. Johnson Utilities operates two water systems within its CC&N area, namely: Johnson Ranch (Public Water System #11-128) and Anthem at Merrill Ranch (Public Water System #11-136).

### Johnson Ranch Water System

The Johnson Ranch water system consists of 14 wells producing approximately 8,355 gallons per minute, 28 storage tanks totaling 7.25 million gallons and a distribution system serving approximately 22,200 service connections.

### Anthem at Merrill Ranch Water System

The Anthem at Merrill Ranch water system consists of 2 wells producing 900 gallons per minute, 2 storage tanks totaling 1.5 million gallons and a distribution system serving approximately 2,510 service connections.

## **ARIZONA DEPARTMENT OF WATER RESOURCES COMPLIANCE**

According to a Water Provider Compliance Report dated March 1, 2018, Johnson Utilities is currently non-compliant with the Arizona Department of Water Resources ("ADWR") for failing to submit the second update to its System Water Plan. The update submission was due to ADWR by January 1, 2018. Staff recommends the Company submit its System Water Plan update and come into compliance with ADWR by April 16, 2018. Staff further recommends the Company ensure it submits the required documentation to ADWR for both the Johnson Ranch water system and Anthem at Merrill Ranch water system.

## **ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY COMPLIANCE**

ADEQ conducted a site inspection of the Section 11 Wastewater Treatment Plant ("WWTP") on January 25, 2018. According to the inspection report, potential deficiencies were noted during the course of the inspection and additional correspondence regarding the inspection may be forthcoming. ADEQ noted the following deficiencies in its report:

- 1) Recharge Basin No. 4 was overflowing at the northwest corner and effluent was flowing west towards the dirt road.
- 2) Recharge Basin No. 4 and 5 were observed with no freeboard<sup>1</sup> as required in Johnson's Aquifer Protection Permit<sup>2</sup>.
- 3) Effluent was observed overflowing at the southeast corner of Recharge Basin No. 7. The drainage pattern and soil erosion indicated the effluent is flowing towards a wash identified as a stormwater detention basin.
  - a. ADEQ observed the same conditions on March 6, 2015 resulting in a Notice of Violation ("NOV") dated May 11, 2015.
  - b. The NOV was closed after Johnson Utilities responded on July 21, 2015. The response included employee training assuring operators were aware of the effluent disposal rules. Additionally, modification was made to the Operator's Standing Operating Procedures to avoid future unauthorized discharges.
- 4) Recharge Basin No. 5 was observed with saturated soil outside the basin which indicated previous overflowing.
- 5) According to Johnson Utilities, the Section 11 WWTP is not disposing enough effluent which causes overflowing of the recharge basins. This condition is due to lower demand by reclaim end users during the winter season.
- 6) The Section 11 WWTP failed to notify ADEQ of freeboard exceedances performance levels that were specifically set for the recharge basins. No five-day notification was reported nor a 30-day investigation report. According to the plant's operator, he did not know these reports were needed.
- 7) At the time of the inspection, a WWTP operator commented the solar panel area could be used as a recharge basin. ADEQ clarified that this area is not included on Johnson's APP and shall not be used unless an amendment is approved by ADEQ.
- 8) At the time of the inspection, the operators did not have an Operations and Maintenance Manual and current APP on-site, as required by Johnson's APP.
- 9) Offensive odors were not perceived at any time during the ADEQ inspection of the aeration lagoons and recharge basins.
- 10) Strong sewage odor was identified outside and within the property limits of the Oasis Sunrise Lift Station.

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<sup>1</sup> The vertical distance from the effluent surface to the top of the confining wall of the basin.

<sup>2</sup> The APP prescribes a two-foot freeboard limit

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- 11) An oil stain was observed on the soil, adjacent to the wet well at the Oasis Sunrise Lift Station.

On February 27, 2018, ADEQ issued a NOV to Johnson Utilities regarding the findings from the January site inspection. The NOV lays out numerous deadlines for documenting remediation and compliance, one of which requires the Company resolve the NOV by June 30, 2018. Staff recommends the Company make the necessary corrections to resolve the NOV with ADEQ no later than June 30, 2018.

On November 3, 2017, ADEQ issued a NOV to Johnson Utilities for operating discharging facilities that do not meet the requirements established in A.R.S 49-243 (B)(1) to operate the best available demonstrated control technologies for recharge basins identified at Pecan Water Reclamation Plant ("WRP"). The Company failed to meet the NOV deadline on February 7, 2018 due to submitting an administrative deficient application. ADEQ has mandated that the Company address the deficiencies in the application and submit a complete APP application by March 22, 2018. The Company is in process of addressing the deficiencies to submit a complete APP application by March 22, 2018. Staff recommends the Company submit a complete APP application to ADEQ no later than March 22, 2018.

### SITE VISIT

On February 23, 2018, Staff Engineers Andrew Smith and Jian Liu conducted a joint visit to inspect the water and wastewater systems in conjunction with ADEQ personnel. Mr. Liu inspected the water systems and Mr. Smith inspected the wastewater systems. Findings from the site inspections are detailed below.

#### *Water System*

Staff noted the following minor operation and maintenance issues during its site inspection:

- 1) A ladder and hatch were not properly secured/locked at the storage tank located at ADEQ Entry Point to the Distribution System No. 007. The hatch was also lacking a proper gasket.
- 2) The well casing at Well No. 55-209384 was not properly sealed around the electrical conduit.
- 3) The well slab at Well No. 55-201429 was cracked.
- 4) There was an opening on the well slab located at the point where the well casing and slab meet at Well No. 55-212850.
- 5) There is a square cover on a round well casing at Well No. 55-598836.

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Staff would note that these are minor operation and maintenance issues and are typically classified as Notice of Opportunity to Correct at ADEQ. Staff recommends the Company make the necessary repairs to resolve the water system operation and maintenance issues listed herein no later than April 16, 2018. During the site visit, the issues were brought to the attention of the Company and it agreed to correct the issues promptly.

*Wastewater System*

Staff noted the following issues during its site inspection:

- 1) Multiple recharge basins located at the Section 11 WWTP did not meet the minimum two-foot freeboard requirement as prescribed in Johnson's APP and were at risk of overflowing.
- 2) The colorization of one of the aeration lagoons located at the Section 11 WWTP was atypical indicating a possible anomaly in the treatment process.
- 3) Johnson Utilities is utilizing recharge basins at its Pecan WWTP that are not included on its APP. The Company is currently in process of modifying its permit.
- 4) A strong sewage odor was identified at the Main Yard Lift Station. This lift station is located on the Johnson Utilities premises where customers are able to pay their bills.

According to Company estimates, it believes there have been approximately six unauthorized discharges at the Section 11 WWTP dating back to 2016. The Section 11 WWTP is the only wastewater plant the Company runs that lacks any monitoring or automated control system. Staff is concerned with the amount of unauthorized discharges at the site and believes immediate implementation of a monitoring and control system is warranted. Staff estimates the cost of the system to be approximately \$25,000. Staff recommends the Company install a monitoring and control system at the Section 11 WWTP no later than April 16, 2018.

Staff believes the repeated odor complaints necessitate further investigation. To that end, Staff understands that ADEQ has contracted with Westland Resources to conduct an air quality investigation of the Company.

Staff also investigated the history of Sanitary Sewer Overflows ("SSO") that are reported to ADEQ either by customers or by the utility. The following table provides the history of SSO from January 2015 to March 2018.

<b>Date Reported</b>	<b>Date of Incident</b>	<b>Description</b>
2/11/2015	2/9/2015	At approximately 11 AM, there was leak on Empire Rd near Gary Rd. The leak came from a force main due to a small crack in the pipe. Approximately 50 gallons were spilled.

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2/11/2015	2/9/2015	At approximately 8 AM, there was a spill near Judd Rd and Felix Rd. The spill came from a three-foot crack in the force main. Approximately 24,000 gallons were spilled and resulted in standing wastewater that measured approximately 100 feet long, 10 feet wide and eight inches deep. The wastewater was located in a farm field with minimum exposure to the public.
2/25/2015	2/22/2015	At approximately 8 AM, 6000 gallons spilled near Village Ln and Morning Sun Circle. The cause was determined to be a piece of manhole ladder rung stuck in a pump at the San Tan Water Reclamation Plant Lift Station.
3/1/2015	3/1/2015	At approximately 5 PM, there was a 40-50-gallon spill near Hunt Hwy and Copper Mine Rd. A manhole was overflowing and the wastewater traveled to a retention basin that is five yards from the site. The Johnson Utilities crew unclogged a manhole filled with grease which caused the overflow to cease.
4/6/2015	3/31/2015	10,000 gallons overflowed at Section 11 WWTP. The cause was undetermined.
4/11/2015	4/11/2015	At approximately 9 AM, 16,000 gallons spilled from a leak in a force main located near Arizona Farms Road and Felix Road.
4/24/2015	4/23/2015	19,000 gallons spilled near Hunt Hwy due to a 90-degree pipe breaking in the manhole.
5/3/2015	5/3/2015	At approximately 6:30 PM, 8,000 gallons spilled in a retention area near Village Lane and Morning Sun Circle. The cause was determined to be a failed influent pump at the San Tan Water Reclamation Plant lift station.
5/8/2015	5/7/2015	At approximately 3:30 PM, 12,000 gallons spilled at a gravity trench line near the Johnson Farms Lift Station. The cause was determined to be a broken force main due to over excavation.
6/14/2015	6/14/2015	At approximately 2:30 PM, 1,500 gallons spilled due to submersible pumps overheating at the Morning Sun Farms Lift Station. Wastewater spilled from the grit chamber and flowed to a retention area next to the lift station.
7/8/2015	7/7/2015	At approximately 6:30 PM, 2,000 gallons spilled in a ditch within a farm field located near Arizona Farms Road and Felix Rd. The cause was determined to be a cracked force main.
8/8/2015	8/7/2015	At approximately, 3:30 PM, 10,000 gallons spilled near Hunt Hwy and Magma Road. The wastewater spilled into a retention area adjacent to the highway. The cause was determined to be a construction company that was boring and hit the pipe.
8/13/2015	8/12/2015	13,500 gallons spilled near the San Tan Wastewater Reclamation Plant Lift Station. The cause was determined to be an unknown liquid in in the lift station causing a pump failure.
8/17/2015	8/12/2015	At approximately 3:30 PM, 13,500 gallons spilled near Morning Sun Circle and Village Lane. The cause was determined to be a lift station backing up at the San Tan Water Reclamation Plant. A

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		second pump failed to turn on due to a layer of sewage caked on the influent vault. The cake prevented a float switch from turning on the pump.
9/10/2015	9/9/2015	At approximately 8 PM, 4,000 gallons spilled near Morning Sun Circle and Village Lane. The cause was determined to be a cracked force main near the Main Yard Lift Station. The wastewater formed a pool that was 250 feet long, 4 feet wide and ½ inch deep.
10/25/2015	10/24/2015	At approximately 2 AM, 117,000 gallons spilled near Tourmaline and Copper Mine Road. The cause was determined to be a cracked force main. The wastewater formed a pool that was 1,300 feet long, eight feet wide and one and half feet deep.
1/7/2016	1/7/2016	A sewer line break on Hunt Hwy near Johnson Ranch Blvd resulted in the release of an undetermined amount of wastewater being spilled.
2/12/2016	2/8/2016	At approximately 2:30 PM, 9,000 gallons spilled near Rittenhouse and Combs Road. The cause was determined to be a broken air relief damaged by a construction company performing grading work. The wastewater formed a pool that was 1,200 feet long, four feet wide and ¾ inch deep.
3/31/2016	3/31/2016	At approximately 3 AM, 8,000 gallons spilled into a retention basin near Rousay Drive and Schnepf Road. The cause was determined to be grease and debris build-up in the gravity sewer line.
5/20/2016	5/20/2016	At approximately 6:35 AM, 9,000 gallons spilled near Rousay Drive and Schnepf Road. The cause was determined to be a grease blockage.
6/6/2016	6/5/2016	At approximately, 6 PM, 1,500 gallons spilled near the Pecan Water Reclamation Plant. The cause was determined to be submersible pump failure due to a blown 200-amp fuse and failed motor savor. An alternator bolt broke on the trash pump and the belt came off.
7/10/2016	7/9/2016	At approximately 5:20 PM, 500 gallons spilled near Muscovite and Silverbell. The cause was determined be grease and wipes caught on manhole ladder rungs. The wastewater formed a pool that was 70 feet long, two feet wide and ½ inch deep.
7/28/2016	7/24/2016	At approximately 3:45 PM, 300 to 500 gallons of wastewater were discharged from the Morning Sun Farms Lift Station. The wastewater traveled approximately 100 feet to an open dirt field where it evaporated and percolated into the ground.
8/8/2016	8/4/2016	At approximately 4:40 PM. 3,000 gallons spilled due to an alternator starter failing to send a signal resulting in high water levels that overflowed.
8/22/2016	8/18/2016	At approximately 10 AM, 3,000 gallons overflowed near Rittenhouse and Combs Road. The cause was determined to be a contractor performing grading activities and damaging a sewer air relief valve.

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10/3/2016	9/30/2016	At approximately 7:15 AM, 100 gallons spilled near High Dunes Road and Escape Ave. The cause was determined to be a build-up of grease and baby wipes at the lift station which blocked floats from sending a signal to activate pumps.
11/4/2016	11/1/2016	At approximately 6:45 AM, 6,000 gallons spilled near Ocotillo Road and Coyote Road.
11/22/2016	11/18/2016	At approximately 11:30 AM, a Johnson Utilities employee noticed discolored dirt along Hunt Hwy near Johnson Ranch Blvd. 400 gallons spilled due to a crack in a force main.
12/7/2016	12/2/2016	At approximately 8 AM, 8,000 gallons spilled and traveled to Queen Creek Wash which is classified as "Waters of the United States" and the Environmental Protection Agency was notified.
1/17/2017	1/13/2017	At approximately 11:30 AM, 1,500 gallons spilled near Hunt Hwy and Oasis Blvd. The cause was determined to be asphalt, branches and construction debris blocking a gravity sewer line.
2/7/2017	2/1/2017	At approximately 11:30 AM, 5,000 gallons spilled near the Ironwood Crossing Lift Station. The cause was determined to be a grit chamber clogging due to mechanical plugs and debris.
2/9/2017	2/4/2017	At approximately 5:45 PM, 11,000 gallons spilled near Charbray Drive and Matthews Drive. The cause was determined to be a crack in the force main.
2/10/2017	2/7/2017	At approximately 8:45 PM. 100 gallons spilled near Stonecreek and Desert Basin in a green belt area. The cause was determined to be a build-up of grease in a gravity sewer line.
6/14/2017	6/14/2017	An unknown amount of wastewater spilled near Hunt Hwy and Johnson Ranch Blvd.
8/19/2017	8/19/2017	An unknown amount of wastewater spilled near Valley Drive.
11/15/2017	11/15/2017	An unknown amount of wastewater spilled near Kenworthy and Ocotillo St.

Because of the number of sanitary sewer overflows in the wastewater system, Staff is concerned that the Company may lack the necessary managerial and technical capabilities to appropriately run the utility.

According to A.R.S. 40-361 (B) "every public service corporation shall furnish and maintain such service, equipment and facilities as will promote the safety, health, comfort and convenience of its patrons, employees, and the public, and as will be in all respects adequate, efficient and reasonable." Additionally, A.A.C. R14-2-607 (A) (C) requires "each utility shall be responsible for the safe conduct and handling of the sewage from the customer's point of collection" and "each utility shall make reasonable efforts to supply a satisfactory and continuous level of service." The quantity of overflows of wastewater demonstrates that the Company is failing to provide adequate service that promotes the safety and health of the public.

The Company has two active NOV's and a history of non-compliance with ADEQ requirements which demonstrates that the Company is failing to provide adequate service.



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Based upon this information, if the Company fails to make the necessary water and wastewater system repairs and installations described herein by April 16, 2018, Staff recommends that the Commission direct Staff to initiate an Order to Show Cause no later than April 20, 2018, in order to appoint an interim manager after due process for the Commission's consideration at a future Open Meeting.

*Sampling*

On February 23, 2018, during the site visit, samples at all entry points and wells in the Johnson Ranch Water System were taken. All samples were pulled in a split sample method. In other words, samples were taken both by ADEQ and Johnson Utilities which are analyzed at separate labs to produce verifiable results. ADEQ is in the process of taking additional tests in the Johnson Ranch Water System and Anthem at Merrill Ranch. Samples were taken at one of the recharge basins located at the Section 11 WWTP and an effluent pond located at Oasis Golf Course. ADEQ is in the process of taking subsequent samples of the wastewater system.

The preliminary results of the drinking water sampling indicate the Company is providing water that meets water quality standards required by 40 CFR 141 and A.A.C Title 18 Chapter 4. Staff is currently awaiting the final laboratory results of the samples from the water and wastewater systems and will supplement its report when the test result is made available by ADEQ.

**ARIZONA CORPORATION COMMISSION CONSUMER SERVICES**

A review of Consumer Service records revealed the following complaints have been filed from January 1, 2015 through March 2, 2018:

<b>Year</b>	<b>Complaints</b>
2018	<b>18 Complaints</b> 10 Billing (High/Disputed) 6 Quality of Service (Can't Reach Company/Customer Service Contact) 2 Disconnect/Terminations
2017	<b>362 Complaints</b> 280 Billing (High/Disputed/CAGR) 42 Quality of Service (Outage or Low Pressure) 21 Quality of Service (Customer Service Contact) 16 Disconnect/Terminations 3 Deposit Note: 107 ADEQ inquiries regarding high nitrate issues
2016	<b>56 Complaints</b> 24 Billing (High or Disputed) 21 Quality of Service (Customer Service Contact) 11 Disconnection/Terminations Note: 22 ADEQ inquiries regarding high nitrate issues
2015	<b>94 Complaints</b> 16 Billing (High or Disputed)

12 Disconnect/Terminations
64 Quality of Service (Removal of Standpipe)
2 Deposit

At the public comment sessions, Johnson Utilities customers raised numerous issues. Among these were bills that fluctuated between high usage. According to the customer, when they contacted Johnson Utilities, they were informed that the fluctuation in their bill, could be a result of possible leaks and possible theft of water by their neighbors.

On March 6, 2018, Staff issued a Data Request to Johnson Utilities requesting any and all complaint data as it relates to Johnson's claim on possible leaks and possible theft of water by customer's neighbor. Staff intendeds to supplement its report based on the result of the billing investigation.

### CONCLUSIONS

1. According to a Water Provider Compliance Report dated March 1, 2018, Johnson Utilities is currently non-compliant with the Arizona Department of Water Resources for failing to submit the second update to its System Water Plan.
2. On February 27, 2018, ADEQ issued a Notice of Violation to Johnson Utilities regarding the findings from the January 25, 2018 site inspection.
3. On November 3, 2017, ADEQ issued a NOV to Johnson Utilities for operating discharging facilities that do not meet the requirements established in A.R.S 49-243 (B)(1) to operate the best available demonstrated control technologies for recharge basins identified at Pecan Water Reclamation Plant.
4. On February 23, 2018, Staff conducted a joint visit to inspect and sample the water and wastewater systems in conjunction with ADEQ
5. Staff noted multiple minor operation and maintenance issues during its site inspection of the water system.
6. Staff noted multiple issues during its site inspection of the wastewater system.
7. Staff is currently awaiting the final results of the samples from the water and wastewater systems.

### STAFF ANALYSIS AND RECOMMENDATIONS

1. Staff recommends the Company submit its System Water Plan update and come into compliance with ADWR by April 16, 2018.

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2. Staff further recommends the Company ensure its submitting the required documentation to ADWR for both the Johnson Ranch water system and Anthem at Merrill Ranch water system.
3. On February 27, 2018, ADEQ issued a NOV to Johnson Utilities regarding the findings from the January site inspection. The NOV lays out numerous deadlines for documenting remediation and compliance, one of which requires the Company resolve the NOV by June 30, 2018. Staff recommends the Company make the necessary corrections to resolve the NOV with ADEQ no later than June 30, 2018.
4. On November 3, 2017, ADEQ issued a NOV to Johnson Utilities for operating discharging facilities that do not meet the requirements established in A.R.S 49-243 (B)(1) to operate the best available demonstrated control technologies for recharge basins identified at Pecan Water Reclamation Plant ("WRP"). The Company failed to meet the NOV deadline on February 7, 2018 due to submitting an administrative deficient application. ADEQ has mandated that the Company address the deficiencies in the application and submit a complete APP application by March 22, 2018. Staff recommends the Company submit a complete APP application to ADEQ no later than March 22, 2018.
5. Staff recommends the Company make the necessary repairs to resolve the water system operation and maintenance issues listed herein no later than April 16, 2018.
6. Staff recommends the Company install a monitoring and control system at the Section 11 WWTP no later than April 16, 2018.
7. Based upon the information, if the Company fails to make the necessary water and wastewater system repairs and installations described herein by April 16, 2018, Staff recommends that the Commission direct Staff to initiate an Order to Show Cause no later than April 20, 2018 in order appoint an interim manager for the Commission's consideration at a future Open Meeting.



Elijah O. Abimah  
Director  
Utilities Division

EOA:AS:nr/NED

ORIGINATOR: Originators: Andrew Smith and Jian Liu


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On this 8th day of March, 2018, the foregoing document was filed with Docket Control as a Utilities Division Memorandum & Proposed Order, and copies of the foregoing were mailed on behalf of the Utilities Division to the following who have not consented to email service. On this date or as soon as possible thereafter, the Commission's eDocket program will automatically email a link to the foregoing to the following who have consented to email service.

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By:   
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Administrative Support Specialist