BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS
ROBERT "BOB" BURNS, Chairman
ANDY TOBIN
BOYD DUNN
SANDRA K. KENNEDY
JUSTIN OLSON

In the matter of the application of EPCOR Water Arizona Inc. for Interim Water Rates Pursuant to A.A.C. R14-2-103(B)(11)(h).

Docket No. WS-01303A-19-0011
15 February 2019

MAGRUDER REPLY TO RESPONSES TO EPCOR APPLICATION FOR INTERIM RATES

MAGRUDER REPLY to Responses of 11 February 2019:

In accordance with the Procedural Order of 31 January 2019, Marshall Magruder, submits this reply to various responses to the EPCOR Application for Interim Rates of 31 January 2019.

1. The Commission Staff Response for a billing adjustment to account for interim rates has no basis and clearly continues to demonstrate significant rate discrimination in violation of various legal requirements cited by this party. The Staff response should be rejected, especially, since the original Staff's position complied with all the cited legal requirements.

2. Most of the other Responses were district-oriented, especially those whose lower rates are subsidized by those being overcharged for the same service. Obviously, the combined rate structures proposed by EPCOR, original Staff and other parties eliminated non-Public Service Corporation (PSC) level rate designs, called for in the original and present Arizona Constitution, to be "fair and reasonable." The locational issues vanish with combined rates.

3. The Response by the Resorts, as I recommended two rate cases ago, should be a new and separate unique Rate Class whereby for water conservation measure incentive exists.

4. Other responses involved determination of the PSC's required revenue that is independent of the rate design for this PSC and some are approved, the required revenue maybe less.

ERRATUM TO MAGRUDER RESPONSE of 11 February 2019:

On page 3, line 12, after "Legal Counsel" add ", during the prior EPCOR rate case,"

This filing is provided to all parties in the Service List as shown below.

RESPECTFULLY SUBMITTED on this 15th day of February 2019.

BY MARSHALL MAGRUDER

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Magruder Reply to Responses to EPCOR Interim Rate Application
Docket No. WS-01303A-19-0011
SERVICE LIST

Original and 13 copies of the foregoing will be mailed (Priority Mail) on 15 February 2019 to:

Docket Control (13 copies)
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15 February 2019