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WASH. UT. & TP. COMM

Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW P.O. Box 47250, Olympia, WA 98504-7250 2009 JUL 26 AM 8:31.

We write to profess our strong disapproval of the filing issue by Suncadia Water LLC on the following grounds:

- 1. Residential properties' fees are unfairly being asked to pay and subsidize a disproportionate amount of the irrigation and golf course facilities (which uses 80% of the pumping capacity of Suncadia).
- 2. Current residential properties' fees are being asked to pay disproportionately for the capital investment of the overall system, which subsidizes the fees paid by owners who have not yet built houses and begun using water. The "ready-to-serve" fees for owners without houses should be raised proportionately instead, to achieve fairness based on where costs come from.
- 3. Water usage estimates upon which fees are being asked to pay are based on grossly flawed assumptions:
  - a) turf planting in Suncadia is discouraged (and in some cases prohibited), and yet an assumption based on statewide average for exterior irrigation of 18,000 gallons per summer is unfairly presumed.
  - b) assuming 100 gallons per person per day in each residential property is a grossly inflated estimate that has not been updated based on the current plumbing industry practices for low-flow fixtures and appliances.
  - c) testing of water usage last summer has been inflated to a staggeringly unfair degree: Their published estimate of 100,000 gallons of water used per residence per summer equates to nearly 2.5 gallons per minute running continuously for 3 months!

We hope you have no doubts whatsoever that Suncadia Water LLC has not been fair in its treatment of its own residents in filing for these fees. We urgently request relief from their unfair approaches and practices.

Norm & Devon Thomas

21 Dogwood Court, Cle Elum, WA