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## **VIA E-FILING**

Mr. Steven V. King, Executive Director and Secretary Washington Utilities and Transportation Commission 1300 South Evergreen Park Drive SW Olympia, WA 98504-7250

Re:

Rainer View Water Company - Sixteenth Revised Sheet No. 21 Canceling Fifteenth Revised Sheet No. 21; Third Revised Sheet No. 21.2 Canceling Second Revised Sheet No. 21.2

Dear Mr. King:

Attached you will find the above-reference tariff sheets. The purpose of this filing is to put into place a conservation rate for the Shaw Cove Water System. Based upon usage in 2015, if customers use the same quantities of water, the filing will generate an additional \$7,118 in revenue. This amount of money represents approximately one-tenth of one percent of the company's revenue in 2015. However, the conservation effort is expected to actually encourage use of less water and the projected amount of revenue that will be raised is in the neighborhood of \$3,500 per year which is less than one-tenth of one percent of the company's 2015 revenue.

The primary reason for this filing is that the Shaw Cove Water System is using water at such a high rate that it exceeds the engineering capacity for the system. Frequently during the summer months, the water level in the storage tank falls below the level needed to be maintained for fire flow purposes. The heavy usage periods are at night. Thus, the customer's use of water appears to be primarily for irrigation. This means that water is being used for irrigation which is needed for fire flow.

In addition, the level of customer use means that the well pumps are running on a twenty-four hour per day seven days a week basis during the summer months. This constant pumping places undue stress on the equipment used to serve this system. Often the storage tank alarms are tripped because the levels fall below what is needed for fire flow. This requires dispatch of company personnel to monitor the well and storage tank.

Attached are three tables to illustrate the problem. The first is for total system usage. This table show increasing usage the last two years. The second is average usage per customer,

which is trending upwards. The third table shows the tank water levels for July, 2015. This table demonstrates the frequent dips into fire flow levels.

The Company has been working with residents on the Shaw Cove water system to try to get them to reduce their usage. The Company will continue those efforts, including establishing voluntary water restrictions and developing new irrigation patterns to ease the stress on the well and storage tank.

The Company will use any revenue generated by this conservation rate to engage in conservation efforts on the Shaw Cove system, do additional leak detection and analysis for the Shaw Cove system and take other steps to try to preserve sufficient fire flow capabilities for the water system.

The Company is not taking this step lightly. In the past, the Company increased the tank size for the system, but does not have the option to further increase the size of the tank. The Company has done a preliminary investigation of intertying the system with other Company water systems. However, early indications indicate that the cost to do so would likely exceed \$750,000. That is a very significant expense for a system that serves approximately eighty customers.

Thank you for your consideration of this filing. A copy of the customer notice is attached. The customer notice compares the new rates with existing rates and provides other information.

RICHARD A. FINNIGAN

RAF/cs Enclosure

cc: Client (via e-mail)