

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

SARAH HAND,

Complainant,

v.

RAINIER VIEW WATER COMPANY, INC.,

Respondent.

NO. UTC Docket No. UW-170924

RAINIER VIEW WATER COMPANY'S
OPPOSITION TO COMPLAINANT'S
MOTION TO COMPEL RAINIER VIEW TO
PRODUCE DOCUMENTS

INTRODUCTION

1. Respondent Rainier View Water Company, Inc. ("Rainier View") requests this Court deny Complainant Sarah Hand's ("Hand") Motion to Compel Rainier View to Produce Documents (the "Motion"). Rainier View's response is neither frivolous nor evasive and Complainant's Motion ignores the fact that Rainier View has already produced all documents Complainant seeks.

ARGUMENT

2. Complainant propounded, and Rainier View responded to two parallel Requests for Production:

- Request for Production No. 2: Produce copies of all complaints from customers on the Southwood System relating to water quality which you received in 2014, 2015, 2016, 2017, and 2018.

1 ○ **Response: Objection. Request for Production No. 2 is vague and**
2 **susceptible to multiple interpretations in the use of the word**
3 **“complaints”. Aside from Complainant’s complaint, previously**
4 **produced, RVWC received no escalated water quality complaints**
5 **from customers during this time period. Accordingly, no such**
6 **documents exist.**

7 • Request for Production No. 3: Produce all work orders relating to water quality
8 complaint from customer on the Southwood System from 2014 to present.

9 ○ **Response: Please see objection and response to Request for**
10 **Production No. 2. Notwithstanding the foregoing, please reference**
11 **documents marked RVWC.UTC000282-291 listing all customer-**
12 **initiated work orders from 1-29-2015 through the present. No**
13 **documents exist for the timeframe prior to 1-29-2015.**

14 3. Rainier View’s objection simply declines to adopt Complainant’s ambiguous
15 nomenclature where it is inconsistent with Rainier View’s terminology:

- 16 • When a customer calls to report a problem with the water, Rainier View creates
17 a work order and logs each such call accordingly.
- 18 • When a customer calls regarding a water problem that requires something
19 other than creating a work order, these customer calls are escalated to a
20 supervisor at Rainier View. Rainier View considers these escalated customer
21 calls to be complaints. Such complaints are noted in the customer’s account.

22 4. The combined effect of Request for Production Nos. 2 and 3 is for Rainier View to
23 produce all work order requests and complaints from 2014 to the present.

24 5. Rainier View produced all work order requests relating to water quality from
25 January 29, 2015 to the present.¹ Records prior to January 29, 2015 no longer exist.

¹ Rainier View also previously produced the After-Hours Call Logs to the extent they pertained to water quality work orders; however, the information contained in the After-Hours Call Logs is duplicative, because the after-hours calls relating to water quality are entered into the work order system.

