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March 16, 2011

VIA E-FILING

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

Re: Summit View Water Works, LLC - Docket No. UW-110220 -
Request for Waiver of WAC 480-110-375(1)(a)

Dear Mr. Danner:

As part of its filing in this case, Summit View Water Works LLC (SVWW) has filed to change its billing interval for irrigation service to an annual basis. Under WAC 480-110-375(1)(a), bills are to be issued at intervals not to exceed three months. Commission Staff has asked SVWW to change its proposal to bill at least every three months. SVWW is willing to bill twice during the irrigation season, which it believes comports with the spirit if not the letter of the rule. SVWW is requesting a waiver of that portion of WAC 480-110-375(1)(a) that requires bills to be issued at intervals not to exceed three months. The basis for the request is set out below.

First, the Company is proposing a flat rated billing system for irrigation water based upon the size of the customer's lot that is being irrigated. This is a per acre (including fractional calculations) charge. This is the same approach that other entities that provide irrigation service in the Tri-cities area of eastern Washington bill for irrigation service.

Second, the irrigation service runs from April 1 to October 1. This is a period of six months. Thus, billing twice during the irrigation season meets the intent of WAC 480-110-375(1)(a) to bill at least every three months.

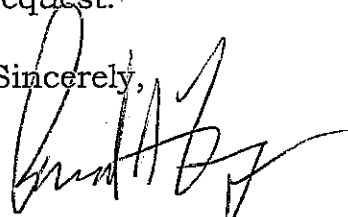
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The Company proposes to bill one-half of the amount due for irrigation service on April 1 and the second half that is due on July 1. To bill an additional two times at a zero rate would only add to the costs of the Company. In the alternative, to split the bill into four parts means customers will be billed when they are not using the irrigation service. SVWW's experience in the past has been that many customers will not pay in these circumstances, creating collection costs. Most irrigation services in the Tri-cities area of eastern Washington bill on an annual basis for irrigation service. It is the usual and customary method of doing business for irrigation service.

The Company's proposal bills irrigation customers during the time they are receiving the irrigation service. Billing two times a year rather than four times a year saves costs that would otherwise be passed on to the customers.

Thank you for your attention to this request.

Sincerely,



RICHARD A. FINNIGAN

RAF/km

cc: Amy White (via e-mail)
John Cupp (via e-mail)
Client (via e-mail)