



**Bob Ferguson**  
**ATTORNEY GENERAL OF WASHINGTON**

Public Counsel

800 Fifth Ave • Suite 2000 • MS TB-14 • Seattle, WA 98104-3188 • (206) 464-7744

April 20, 2020

Mark Johnson  
Executive Secretary and Director  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

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State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Re: Wildwood Water Company, LLC (General Rate Increase)  
Docket UW-200277

The Wildwood Water Company initially sought a rate increase of approximately \$19,000, or 20 percent. Based on the revised tariff sheets filed on April 15, 2020, the company revised its request downward to \$9,967, or approximately 10.5 percent. Commission Staff supports the rate increase. The large increase concerns Public Counsel given its timing in relation to current events.

Wildwood serves 222 customers on Whidbey Island. The public health crisis poses a significant challenge for Washingtonians, including those on Whidbey Island. A steep rate increase, such as this one, will certainly have a negative impact on customers. Customer impact must be weighed against the company's need for increased rates.

Water, in particular, plays a critical role in battling the public health crisis. Water is needed to effectively wash hands to prevent the spread of the novel coronavirus, which causes the disease COVID-19. Because water is critical, Wildwood must not disconnect customers for nonpayment during the global pandemic. Indeed, the energy utilities regulated by the Utilities and Transportation Commission have committed to not disconnecting customers during these difficult times. Moreover, Governor Inslee, in his Proclamation 20-23.2, "prohibits all energy, telecommunication, and water utilities in Washington State from disconnecting certain residential utilities and from charging related late payment and reconnection fees until May 4, 2020." Importantly, the Governor's proclamation prohibits disconnections from March 23, 2020, through May 4, 2020, and further prohibits utilities from refusing to reconnect any residential

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customer who has been disconnected due to nonpayment. These protections are paramount in protecting customers and fighting the pandemic.<sup>1</sup>

The Governor's Proclamation 20-23.2 states, "Preserving and maintaining essential utility services to vulnerable populations during this crisis supports the fundamental public purpose of protecting public health and welfare."

Public Counsel has reviewed Wildwood's filing. Public Counsel agrees with Staff's downward adjustments to the filing. However, the timing of this rate increase makes the rates unfair to customers. To increase rates as hundreds of thousands of Washingtonians are losing their jobs or experiencing hour reductions at work places the health and welfare of Wildwood's customers at risk. Undoubtedly, the economic impacts of the COVID-19 pandemic will carry forward longer than the immediate viral impact.

As a result, Public Counsel cannot support the rate requested by Wildwood. Therefore, we ask that the Commission deny the rate increase or delay the effective date until the public health crisis is resolved in Washington. Additionally, Public Counsel asks the Commission to emphasize the Governor's Proclamation 20-23.2 prohibiting disconnections for nonpayment.

Public Counsel will be present at the open meeting on April 23, 2020, and will be available to discuss this matter further. In the meantime, questions can be directed to Lisa Gafken at [Lisa.Gafken@atg.wa.gov](mailto:Lisa.Gafken@atg.wa.gov), Sarah Laycock at [Sarah.Laycock@atg.wa.gov](mailto:Sarah.Laycock@atg.wa.gov), or Thomas Johnson at [Thomas.Johnson@atg.wa.gov](mailto:Thomas.Johnson@atg.wa.gov).

Sincerely,

/s/ *Lisa W. Gafken*

LISA W. GAFKEN  
Assistant Attorney General  
Public Counsel Unit Chief  
(206) 464-6595

LWG/CM

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<sup>1</sup> Customers are not relieved of the obligation to pay for the services they receive, as also recognized by both Public Counsel and the Governor's Proclamation 20-23.2.