

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: September 4, 2024 DOCKETS: UW-230598/UW-230079 REQUESTER: Washington Water		WITNESS: Mike Young RESPONDER: Mike Young TELEPHONE: (360) 664-1155
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DATA REQUEST NO. 1:

Please provide all written communications and documentation of verbal communications from Echo Glen Water System customers to UTC Staff from 2020 to present as referenced in the Complaint, paragraphs 4 and 5.

RESPONSE:

Some of the communications referred to in Complaint paragraphs 4 and 5 were communications that Staff reviewed rather than communications directly from customers to UTC Staff. Written communication and documentation of the communications from Echo Glen Water System customers, as referenced in paragraphs 4 and 5 of the Complaint, are detailed in the following documents:

1. Direct Testimony of Mike Young (Exh. MY-1T) at page 4, line 13 through page 5, line 3; page 13, line 18 through page 16, line 9.
2. Declaration of Mike Young (Exh. MY-2), paragraphs 3 through 9 and 13-14, and Attachments 1, 2, 3, and 4.
3. UTC's response to WWSI's Public Records Request - RFPR response #R001030, copies of which are provided in response to this request. See attached. "Installment 02" includes customer complaints received by the UTC Consumer Protection division.
4. See also UTC Open Meeting August 10, 2023 Recording at 39:11 through 1:36:55. <https://wutc.app.box.com/v/OpenMeetings/file/1288044702722>

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DATA REQUEST NO. 2:

If the documents requested in WWS Data Request No. 1 are not in your possession, please provide all documents and/or other evidence that supports your allegations regarding Echo Glen Water System customer complaint to the UTC in paragraphs 4 and 5 of the Complaint.

RESPONSE:

Staff is unaware of additional documents other than what is provided in response to Data Request No. 1.

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DATA REQUEST NO. 3:

Please provide all written communications and documentation of verbal communications from Echo Glen Water System customers to the Department of Health from 2020 to present as referenced in the Complaint, paragraph 5.

RESPONSE:

Staff's knowledge of the communications between Echo Glen customers with Department of Health is limited to what it has received. There may be other communications between those entities that Staff is unaware of.

To Staff's knowledge, written communication and documentation of the communications from Echo Glen Water System customers, as referenced in paragraph 5 of the Complaint, are detailed in the following documents:

1. Direct Testimony of Mike Young (Exh. MY-1T) at page 4, line 18 through page 5, line 3.
2. Declaration of Mike Young (Exh. MY-2), paragraph 3 through 4, and Attachments 3, 5, 6, 7.
3. UTC's response to WWSI's Public Records Request - RFPR response #R001030, copies of which are provided in response to Data Request 1. "Installment 01" includes communications with Department of Health.

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DATA REQUEST NO. 4:

If the documents requested in WWS Data Request No. 4 are not in your possession, please provide all documents and/or other evidence that supports your allegations regarding Echo Glen Water System customer complaints to the Department of Health in paragraph 5 of the Complaint.

RESPONSE:

As stated in response to Data Request 3, there may be other communications between customers and Department of Health. Staff is unaware of communications and documentation outside of those identified in response to Data Request No. 3.

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DATA REQUEST NO. 5:

Please provide the written communications between the Department of Health and the UTC Staff as referenced in the Complaint, paragraphs 8, 9, and 10.

RESPONSE:

Written communication and documentation of the communications between the Department of Health and the UTC, as referenced in paragraphs 8, 9, and 10 of the Complaint, are detailed in the following documents:

1. Direct Testimony of Mike Young (Exh. MY-1T) at page 6, line 1-2; page 8, line 1 through page 13, line 13.
2. Declaration of Mike Young (Exh. MY-2), paragraph 9 through 11, and Attachments 3, 5, 6, and 7.
3. UTC's response to WWSI's Public Records Request - RFPR response #R001030, copies of which are provided in response to Data Request 1. "Installment 01" includes communications with Department of Health.

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DATA REQUEST NO. 6:

Please provide a copy of all written communications and documentation of verbal communications between UTC Staff and Washington Water Supply, Inc. and/or John Poppe from January 1, 2020 to present.

RESPONSE:

In addition to documents attached to the Direct Testimony of Mike Young (Exh. MY-1T) and the Declaration of Mike Young (Exh. MY-2), please see the communications attached to the response to this request. The communications are organized into folders as followed:

1. UW230598-240079 Staff Response to DR 6 CP
 - a. CP – AR
 - b. CP – MCK
 - i. 1
 - ii. 2
 - iii. 3
 - iv. 4
 - v. 5
 - vi. 6
 - vii. 7
 - viii. 8
 - ix. 9
 - x. 10
2. UW230598-240079 Staff Response to DR 6 JL
3. UW230598-240079 Staff Response to DR 6 MY
4. UW230598-240079 Staff Response to DR 6 TV

CP = Consumer Protection
AR = Andrew Roberts
MCK = Melissa Castaneda-Kerson
JL = Jeanine Leggett
MY = Mike Young
TV = Tiffany Van Meter

The 10 subfolders in folder CP – MCK have no special meaning. The messages saved in those subfolders would have been saved into one single folder (with no subfolders); however, it became unwieldy due to similar file names. Breaking the emails into batches and saving them into subfolders resolved the file name issue.

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DATA REQUEST NO. 7:

Please provide a copy of the transcript for the August 10, 2023 open meeting if already in your possession.

RESPONSE:

The Commission does not have its open meetings transcribed but does maintain the video recordings on its website ([Open Meetings | Powered by Box](#)). The link to the August 10, 2023, open meeting recording is provided here:
<https://wutc.app.box.com/v/OpenMeetings/file/1288044702722>.