

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
 STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: March 6, 2025 DOCKETS: UW-230598/UW-230079 REQUESTER: Washington Water	WITNESS: Jeanine Leggett RESPONDER: Jeanine Leggett TELEPHONE: (360) 664-1230
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WWS DATA REQUEST NO. 8:

Please provide Jeanine Leggett’s official job title and job description.

RESPONSE:

Please see Testimony of Jeanine Leggett, Exh. JL-1T at 1:9-11, where she testifies that she is employed as a Regulatory Analyst with the Commission.

Job Description:

This expert-level and advanced position directly supports the agency's mission by providing technical analysis and recommendations necessary for the Commission's decision-making processes with respect to utility and transportation services and the rates charged for those services. This expert-level position works on more complex issues with significant and broad impact on private solid waste collection, transportation, water companies, customers, and other stakeholders. This advanced position plays a critical role in helping the Commission navigate the most complex technical issues by conducting reliable analysis, summarizing and packaging information clearly, accurately, and in easy-to-understand terms, identifying the critical decision points of complex filings, and balancing stakeholder interests. Tasks are unstructured and require the incumbent to understand the private water and transportation industries and operating environment; apply appropriate administrative codes, statutes, regulatory policies and procedures, legal and regulatory precedents, and other information to complete assignments. The recommendations made by this position are essential to the Commission as it attempts to regulate fairly and in the public interest.

This position supports the Commission's values including antiracism, equity, diversity, and inclusion.

This expert-level and advanced position further supports the agency's mission through project management and leadership responsibilities, training and mentoring other staff. This position demonstrates the Position Specific and Agency-Wide Core Competencies as applicable to each individual key result.

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WWS DATA REQUEST NO. 9:

Please provide the UTC's organizational chart containing Ms. Leggett's reporting structure.

RESPONSE:

Jeanine Leggett- Regulatory Analyst  Mike Young- Senior Regulatory Advisor



Jaclynn Simmons- Section Manager



Jing Roth- Deputy Director of Telecom, Water and Transportation



Neiri C- Director of Regulatory Services



Jeff Killip- Executive Director/Secretary

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WWS DATA REQUEST NO. 10:

Please provide a list of all water rate cases that Ms. Leggett has been designated as a “lead” since her 2023 UTC employment. Additionally, provide a list of all water rate cases she has been involved with in any capacity since her 2023 UTC employment. Make sure to include the docket number and date range for each case.

RESPONSE:

Assigned as Lead:
UW-230670 filed 8/15/2023 closed 11/01/2023.
UW-230502 filed 6/22/2023 closed 9/11/2023.
UW-240428 filed 5/22/2024 closed 7/25/2024.
UW-240585 filed 7/29/2024 closed 10/25/2024.
UW-240290 filed 4/30/2024 closed 6/13/2024.
UW-230598 filed 7/13/2023 closed ongoing.

This list of cases represents Ms. Leggett’s complete water caseload since she joined the Commission.

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WWS DATA REQUEST NO. 11:

Please provide all dates, times, relevant presentation materials, and relevant documentation of Ms. Leggett's presentations to the Commission related to WWS.

RESPONSE:

Staff assumes that this request is asking for presentations and relevant documents within this docket.

On August 10, 2023, Ms. Leggett presented to the Commission to implement a surcharge and allow tariff revisions to take effect August 15, 2023, and expire on November 15, 2023, subject to the Company filing a general rate case with an effective date no later than February 15, 2024.

The memo can be found with in this docket: [Open Meeting 2023-08-10T09:30:00-07:00](#) and the open meeting recording can be found here: <https://wutc.app.box.com/v/OpenMeetings/file/1288044702722>.

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WWS DATA REQUEST NO. 12:

Please provide copies of all of Ms. Leggett’s performance evaluations. Please include any verbal or written recommendations and/or actions taken as a result of each evaluation.

RESPONSE:

Objection. Overly broad and burdensome; unnecessarily duplicative as Ms. Leggett’s qualifications and experience has been provided; irrelevant because the request is not reasonably calculated to lead to the discovery of admissible evidence; seeks to invade Ms. Leggett’s privacy.

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WWS DATA REQUEST NO. 13:

Please list all of the training courses and seminars that Ms. Leggett has attended since January 2023.

RESPONSE:

Anti-Discrimination-Harassment-Sexual Harassment- 4/6/23
Reasonable Accommodation- 4/6/23
Respectful Environment- 4/6/23
WA State Ethics in State Government 4/20/23
WA State Sexual Harassment Prevention for all employees- 4/24/23
A path toward equity assessment- 4/24/23
Who We Are- A Chronicle of Racism in America- 4/24/23
OFM Travel and Expense Management system- 9/19/23
NARUC Fall 2023 Rate School – 10/15/23 - 10/20/23
Module 1- A Path Toward Equity- 11/8/23
Module 2- A Path Toward Equity- 12/7/23
Module 3- Apath Toward Equity- 12/13/23
Module 4- A Path Toward Equity- 1/18/24
WA State IT Security Awareness- 4/18/24
WA State IT security training- 7/5/24
WA State First Amendment Video Auditor Awareness- 10/28/24
WA State Privacy Basics for all employees- 2/25/25

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WWS DATA REQUEST NO. 14:

Please list all of the “accounting services to various organizations” Ms. Leggett references in her January 22, 2025 testimony on page 1, line 20. Please include the organization’s name, Ms. Leggett’s immediate supervisor, the length of time she spent at the organization, and her reason for leaving.

RESPONSE:

Objection. With respect to immediate supervisor and reason for leaving, this request is overly broad and burdensome; unnecessarily duplicative as Ms. Leggett’s qualifications and experience has been provided; irrelevant because the request is not reasonably calculated to lead to the discovery of admissible evidence; seeks to invade Ms. Leggett’s privacy.

Without waiving and subject to the stated objections, Staff responds as follows:

Robert Half International Inc – Accounting/Payroll Consultant - 3 years 2 months
Stanford Youth Solutions – Payroll Analyst - 5 months
Inspiration Catering & Baking – Owner/Operator - 10 years 9 months
The Maven Inc. – Staff Accountant – 8 months
Crisis Connections – Interim Business Manager – 10 months
Dioceses of Olympia – Staff Accountant – 10 months
AHBL – Accounting Assistant – 2 years 3 months
Rylem, LLC – Payroll Accountant – 1 year 2 months
Grakon, LLC – Accounting Assistant – 2 years 5 months

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WWS DATA REQUEST NO. 15:

Please confirm whether or not Ms. Leggett has ever testified before the Commission. If she has, please provide the docket number, date, time, and all relevant documents detailing the presentation.

RESPONSE:

Please see Testimony of Jeanine Leggett, Exh. JL-1T at 1:22-23, where she testifies that she has not previously testified before the Commission.

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WWS DATA REQUEST NO. 16:

Please provide the written policy and/or procedure for filing a general rate case. Please include the policy and/or procedure that details what should be included in a general rate case, where it should be filed, and any sample formats.

RESPONSE:

Objection. Asks for publicly available information; overly broad and burdensome.

Water companies are expected to understand and comply with regulatory requirements, including how to file rate cases. For a non-exhaustive list of rate case requirements, please see the following:

Chapter 80.28 RCW (Gas, Electrical, and Water Companies)

<https://app.leg.wa.gov/RCW/default.aspx?cite=80.28>

Chapter 80.04 RCW (Regulations - General)

<https://app.leg.wa.gov/RCW/default.aspx?cite=80.04>

Chapter 480-07 WAC (Procedural Rules)

<https://app.leg.wa.gov/WAC/default.aspx?cite=480-07>

Chapter 480-80 WAC (Utilities General – Tariffs and Contracts)

<https://app.leg.wa.gov/WAC/default.aspx?cite=480-80> WAC 480-07-530 General rate proceeding filings—Water companies and Class B telecommunications companies.

The company must file all required documents in electronic form consistent with the requirements in WAC [480-07-140](#).

UTC website: <https://www.utc.wa.gov/regulated-industries/utilities/water>

Attached to this response is the GRC workbook that water utilities use to present their general rate case calculation.

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WWS DATA REQUEST NO. 17:

Please provide all documentation, including but not limited to notes and meeting minutes, demonstrating that WWS did not file for a general rate case.

RESPONSE:

Objection. Asks for publicly available information; overly broad and burdensome; calls for attorney client privileged information and work product.

Commission records show that the last rate case for WWS was filed in Docket UW-961255. Rates from that docket which became effective on November 7, 1996.

In Docket UW-230589, the Commission ordered WWS to file a general rate case. See Order 01, available here:

<https://apiproxy.utc.wa.gov/cases/GetDocument?docID=15&year=2023&docketNumber=230598>

In Docket UW-240079, WWS filed a tariff revision in Docket UW-230598 to include a surcharge of \$60 per month for the recovery of purchased water expenses due to well issues and high summer usage on the Echo Glenn water system located in Maple Valley. Filing for a surcharge, and not for general rates, is on its face not a general rate case.

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WWS DATA REQUEST NO. 18:

Please provide all policies and procedures that define “normal and recurring” as stated in Ms. Leggett’s January 22, 2025 testimony on page 3, line 19.

RESPONSE:

Objection. Overly broad and burdensome. Requests publicly available information.

There is no discrete written policy defining “normal and recurring.” The idea of normal and recurring expenses is a long-standing regulatory principle. Utility expenses are “normalized” during the ratemaking process to represent the usual level of expenses. Abnormal or one-time expenses can be removed from the rate calculation. Normal and recurring expenses are considered non-GAAP adjustments. These ongoing expenses are necessary for a company’s operations and revenue-generating activities.

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WWS DATA REQUEST NO. 19:

Please provide all policies, procedures, notes, and meeting minutes, and describe all verbal conversations, supporting Ms. Leggett’s January 22, 2025 testimony stating, “Staff looks to determine if the Company prudently decided to acquire an asset and whether the asset is in service and used and useful” beginning on page 3, line 22.

RESPONSE:

Objection. Overly broad and burdensome. Requests publicly available information. Additionally, this request may request work product or attorney-client privileged material. Without waiving and subject to the stated objection, Staff responds as follows:

The assets referred to in Jeanine Leggett’s testimony is rate base. There is no discrete written policy regarding rate base. Rather, rate base is evaluated using long-standing regulatory principles of used and useful and prudence. Rate base is one component in the ratemaking calculation. The referenced testimony describes how Staff evaluates rate base in a rate filing. Utilities must prove that rate base assets are used and useful and in-service, in addition to being prudent, to be included in rates. See RCW 80.04.250; Wash. Utils. & Transp. Comm’n v. Puget Sound Energy, Inc., Dockets UE-111048/UG-111049 (consol.), Order 08, ¶ 409 (May 7, 2012).

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WWS DATA REQUEST NO. 20:

Please describe and provide all “established regulatory principles” followed by Staff as stated by Ms. Leggett in her January 22, 2025 testimony on page 4, line 7. Please include when those principles were adopted and/or approved by the Commission and how often the principles are updated.

RESPONSE:

Objection. Overly broad and burdensome. Requests publicly available information. Without waiving and subject to the stated objection, Staff responds as follows:

The cited testimony includes Ms. Leggett’s testimony regarding prudence review. Her testimony is consistent with Wash. Utils. & Transp. Comm’n v. Puget Sound Energy, Inc., Dockets UE-111048/UG-111049 (consol.), Order 08, ¶ 409 (May 7, 2012), which sets forth the following factors considered by the Commission when evaluating prudence. Those factors are set forth in Puget Sound Energy as follows:

- 1) **The Need for the Resource:** The utility must first determine whether new resources are necessary. Once a need has been identified, the utility must determine how to fill that need in a cost-effective manner. When a utility is considering the purchase of a resource, it must evaluate that resource against the standards of what other purchases are available, and against the standard of what it would cost to build the resource itself.
- 2) **Evaluation of Alternatives:** The utility must analyze the resource alternatives using current information that adjusts for such factors as end effects, capital costs, dispatchability, transmission costs, and whatever other factors need specific analysis at the time of a purchase decision. The acquisition process should be appropriate.
- 3) **Communication With and Involvement of the Company’s Board of Directors:** The utility should inform its board of directors about the purchase decision and its costs. The utility should also involve the board in the decision process.
- 4) **Adequate Documentation:** The utility must keep adequate contemporaneous records that will allow the Commission to evaluate the Company’s decision-making process. The Commission should be able to follow the utility’s decision process; understand the elements that the utility used; and determine the manner in which the utility valued these elements.

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For additional information about regulatory principles, see the following non-exhaustive list of resources:

Bluefield Waterworks & Improvement v. Pub. Serv. Comm'n. of W. Va., 262 U.S. 679, 43 S. Ct. 675 (1923)

Fed. Power Comm'n. v. Hope Nat. Gas Co., 320 U.S. 591, 64 S. Ct. 281 (1944)

Wash. Utils. & Transp. Comm'n v. Puget Sound Energy, Inc., Dockets UE-090704 and UG-090705 (*consol.*), Order 11 (Apr. 2, 2010)

Wash. Utils. & Transp. Comm'n v. The Wash. Water Power Co., Docket U-83-26, Fifth Supplemental Order at 13 (Jan. 19, 1984)

POWER v. WUTC, 104 Wash.2d 798 (1985)

Regulated Industries in a Nutshell, Pierce, David and Gellhorn, Ernest, 4th Edition (Jan. 1, 1999)

Principles of Public Utility Rates, Bonbright, James (1961)

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WWS DATA REQUEST NO. 21:

Please explain whether UTC Staff uses the same “established regulatory principles” in every water case. If the answer is no, please explain.

RESPONSE:

Yes, the same regulatory principles are used in each water case.

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WWS DATA REQUEST NO. 22:

Regarding Ms. Leggett’s statement in her January 22, 2025 testimony where she states that “Staff largely looks to whether the Company prudently incurred [test-year expenses],” please list which expenses were prudently incurred and which expenses were not prudently incurred.

RESPONSE:

Please see Testimony of Jeanine Leggett at 5:21 - 12:6, where Ms. Leggett testifies about the adjustments she made to calculate an appropriate rate. Where Ms. Leggett did not include an adjustment to an expense, she reviewed the expense and found it to be reasonable and prudent. Ms. Leggett made the following adjustments:

- Ready to serve revenue \$519 (revenue not accounted for by company)
- Contractual accounting \$7,627 (no contracts exist)
- Cost of trucked in water \$19,290 (being recovered through surcharges)
- Tree removal fees (amortized over 5 years instead of 1 year)
- Depreciation expenses adjustments to come into compliance with straight-line depreciation methods; reduces depreciation expense by \$509.91. This impact other revenue sensitive items as described in Ms. Leggett’s testimony at Exh. JL-1T at 11:9 – 12:6

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WWS DATA REQUEST NO. 23:

Please list what “post-test-year expenses” (as referenced on page 4, line 15 of Ms. Leggett’s January 22, 2025 testimony) were included in the rate analysis.

RESPONSE:

There were no post-test-year expenses.

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WWS DATA REQUEST NO. 24:

Please provide the statute or regulation that requires WWS to have a contract for outside accounting.

RESPONSE:

There is not a statute or regulation that requires a contract for outside accounting; however, if a total amount is entered into a line stating “contractual accounting” there should be a contract to review for prudence.

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WWS DATA REQUEST NO. 25:

Please provide all of the reasons why Ms. Leggett determined that accounting services were not accurate or necessary.

RESPONSE:

See Staff's Response to WWSI Data Request No. 5. WWS could not establish why they paid the amount listed or the amount that was necessary to the provision of water service.

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WWS DATA REQUEST NO. 26:

Please provide all documentation demonstrating that WWS requested \$19,290 for purchased water be included in the general rate case.

RESPONSE:

Please see Jeanine Leggett’s testimony and exhibits, Exh. JL-1T and Exh. JL-2 through JL-7. The Company did not file a general rate case. Purchased water was included as an expense in the Company’s General Ledger. Staff entered all expenses identified in the Company’s records into the ratemaking model as the baseline. Staff then made adjustments to calculate rates for the Company.

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WWS DATA REQUEST NO. 27:

Please provide all documentation demonstrating that WWS requested \$5,500 for tree removal expenses be included in the general rate case.

RESPONSE:

Please see Jeanine Leggett’s testimony and exhibits, Exh. JL-1T and Exh. JL-2 through JL-7. The Company did not file a general rate case. Tree removal was included as an expense in the Company’s General Ledger and included in the total expenses listed on the Company’s Income Statement for the test year. Staff entered all expenses identified in the Company’s records into the ratemaking model as the baseline. Staff then made adjustments to calculate rates for the Company.

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WWS DATA REQUEST NO. 28:

Please explain why Ms. Leggett chose to amortize tree removal costs over five years rather than three or four years.

RESPONSE:

Ms. Leggett considered how long the Company has been operating without a general rate case and how often tree trimming likely occurs. Staff chose the longer duration, so over collection would be least likely to occur. Staff normally use 3 or 5 years for amortization periods, so this adjustment falls into Staff's standard practice.

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WWS DATA REQUEST NO. 29:

Please provide the “Excel model for water Company rate calculations” referenced by Ms. Legget in her January 22, 2025 testimony on page 10, line 16.

RESPONSE:

The Excel model is contained in Jeanine Leggett’s Exh. JL-5.

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WWS DATA REQUEST NO. 30:

Please provide all items that constitute “Bad Debt” totaling \$453.19. Please include all supporting documentation.

RESPONSE:

Bad debt calculated through a formula in the water model spreadsheet based on a percentage of revenue. The calculation is:

Operating Revenue * Bad Debt Percent (0.005) - Other Licenses = Bad Debt

Please see Jeanine Leggett’s Exh. JL-5.

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WWS DATA REQUEST NO. 31:

Please provide all documentation demonstrating that WWS requested a “hypothetical capital structure of 60 percent equity and 40 percent debt, with a 12 percent return on equity” as stated in Ms. Leggett’s January 22, 2015 testimony on page 13, lines 14-15.

RESPONSE:

Staff determined a hypothetical capital structure of 60 percent equity and 40 percent debt, with a 12 percent return on equity should be applied in this case. The Company made no changes to those assumptions within the model. A hypothetical capital structure is used when equity exceeds 60 percent (to limit risk and lower the cost of capital to customers) or when an actual capital structure cannot be determined from the balance sheet provided by the Company. There are no additional documents to provide that have not been filed in the docket or submitted in discovery.

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WWS DATA REQUEST NO. 32:

Please provide all policies and procedures demonstrating UTC Staff’s tradition of allowing a 12 percent return on equity as an incentive for smaller companies...” as stated in Ms. Leggett’s January 22, 2025 testimony on page 13, line 22 through page 14, line 1. Please include a list of all water companies where this principle was applied between 2023 to present.

RESPONSE:

The Commission approved 12 percent return on equity in Docket UW-010877, and that determination was used when creating the baseline assumptions in the water ratemaking model. See also Docket UW-980072. The following dockets are examples of where water companies and the Commission have applied 12 percent return on equity:

- UW-250066
- UW-240798
- UW-240585
- UW-240428
- UW-240290
- UW-240203
- UW-240163
- UW-230236
- UW-230132