

Dockets UW-240079 and UW-230598
WWS Responses to
UTC Staff Data Request Nos. 1-6
July 23, 2024
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GENERAL INSTRUCTION FOR DISCOVERY

Please review all Excel documents and workpapers for hidden cells. Hidden cells include hidden worksheets, columns, rows and ranges. Please ensure that all items provided pursuant to these requests do not contain any hidden cells or formulas.

DATA REQUESTS DIRECTED TO: Washington Water
REQUESTED BY: Michael Young

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UTC STAFF DATA REQUEST NO. 1:

Please identify each water system by its Department of Health number, and provide the following information for each system:

- a. Number of metered connections
- b. Number of flat rate connections
- c. Number of ready to serve (RTS) connections

WWS Response to Request No. 1:

- a. **82 metered connections**
- b. **74 flat rate connections**
- c. **1 ready to serve**

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced July 23, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 2:

Please provide for each system identified by its Department of Health number the amount of water pumped from each well for calendar year 2023 in 100 cubic feet (or gallons if reported to Department of Ecology in gallons).

WWS Response to Request No. 2:

- **Echo Glen – 2,452,800 gallons**
- **Crystal Creek – 2,464,115 gallons**
- **Maple Haven – 901,550 gallons**
- **The Class B water systems have master meters at the well head. No annual readings are recorded.**

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced July 23, 2024.**
- **Response prepared by Alysia M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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UTC STAFF DATA REQUEST NO. 3:

Please provide by year, the number and amount of facilities charges collected since January 2002, broken down by system if possible.

WWS Response to Request No. 3:

No facilities charges have been collected since January 2002.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced July 23, 2024.**
- **Response prepared by Alysia M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 4:

Please provide the general ledger detail for calendar year 2023 for the following accounts:

- a. 7020-Officers' Salaries
- b. 7130-Shop Supplies
- c. 7135-Grounds Repairs
- d. 7160-Purchased Power
- e. 7162-Purchased Water
- f. 7280-Telephone
- g. 7285-Internet
- h. 7320-Customer Relations
- i. 7400-Transportation Expense
- j. 9100-Depreciation and Amortization

WWS Response to Request No. 4:

Please see the general ledger and depreciation documents included with these responses.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced July 23, 2024.**
- **Response prepared by Alys M. Grimes, John Poppe, and Lloyd Gibbons for**

WWS.

- **John Poppe can testify on behalf of WWS regarding this information.**

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UTC STAFF DATA REQUEST NO. 5:

Please provide all contracts and agreements for 7422-Outside Accounting.

WWS Response to Request No. 5:

There are no contracts for outside accounting.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced July 23, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 6:

For each water system identified by its Department of Health number, please provide the annual revenues for 2023 from:

- a. Metered connections
- b. Flat rate connections
- c. Ready to serve (RTS) connections

WWS Response to Request No. 6:

- a. **\$0**
- b. **\$80,964**
- c. **\$0**

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced July 23, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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GENERAL INSTRUCTION FOR DISCOVERY

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DATA REQUESTS DIRECTED TO: Washington Water
REQUESTED BY: Michael Young

UTC STAFF DATA REQUEST NO. 1:

Please identify each water system by its Department of Health number, and provide the following information for each system:

- a. Number of metered connections
- b. Number of flat rate connections
- c. Number of ready to serve (RTS) connections

WWS Supplemental Response to Request No. 1:

1. **Echo Glen, DOH #27510D**
 - a. **0 metered connections**
 - b. **42 flat rate connections**
 - c. **1 ready to serve**
2. **Wolf, DOH #304014**
 - a. **0 metered connections**
 - b. **3 flat rate connections**
 - c. **0 ready to serve**
3. **Hinkley Hills, DOH #30406P**
 - a. **0 metered connections**
 - b. **8 flat rate connections**
 - c. **0 ready to serve**
4. **MPVK, DOH #473128**
 - a. **0 metered connections**
 - b. **9 flat rate connections**
 - c. **0 ready to serve**
5. **Crystal Creek, DOH #474214**
 - a. **0 metered connections**
 - b. **41 flat rate connections**
 - c. **0 ready to serve**
6. **Noll Road, DOH #637730**
 - a. **0 metered connections**
 - b. **4 flat rate connections**
 - c. **0 ready to serve**
7. **Deer Trail, DOH #314649**
 - a. **0 metered connections**
 - b. **6 flat rate connections**

c. 0 ready to serve

8. Maple Haven, DOH #51150M

- a. 0 metered connections**
- b. 17 flat rate connections**
- c. 0 ready to serve**

9. Salmon Drive, DOH #028340

- a. 0 metered connections**
- b. 9 flat rate connections**
- c. 0 ready to serve**

WAC 480-07-405(7)(a)(iii) Requirements:

- Response produced July 24, 2024.**
- Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 6:

For each water system identified by its Department of Health number, please provide the annual revenues for 2023 from:

- a. Metered connections
- b. Flat rate connections
- c. Ready to serve (RTS) connections

WWS Supplemental Response to Request No. 6:

1. Echo Glen, DOH #27510D

- a. \$0
- b. \$21,798.00
- c. \$0

2. Wolf, DOH #304014

- a. \$0
- b. \$1,557.00
- c. \$0

10. Hinkley Hills, DOH #30406P

- a. \$0
- b. \$4,152.00
- c. \$0

11. MPVK, DOH #473128

- a. \$0
- b. \$4,671.00
- c. \$0

12. Crystal Creek, DOH #474214

- a. \$0
- b. \$21,279.00
- c. \$0

13. Noll Road, DOH #637730

- a. \$0
- b. \$2,076.00
- c. \$0

14. Deer Trail, DOH #314649

- a. \$0
- b. \$3,114.00
- c. \$0

15. Maple Haven, DOH #51150M

- a. \$0
- b. \$8,823.00
- c. \$0

16. Salmon Drive, DOH #028340

- a. \$0
- b. \$4,671.00
- c. \$0

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced July 24, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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GENERAL INSTRUCTION FOR DISCOVERY

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REQUESTED BY: Michael Young

WWS Note: All available documents have been produced. There may be further production after documents from John Poppe's public records request have been received and reviewed.

UTC STAFF DATA REQUEST NO. 7:

Please provide a description of the duties performed by Mr. Poppe related to the approximately \$12,000 of salary expense. Please include time sheets, hourly rates, or other calculations that support that specific amount.

WWS Response to Request No. 7:

Mr. Poppe is paid \$12,000 per year to be on call for emergencies, customer response, escrow response, accounting, water samples and transportation, coordination of subcontractors, regulatory interface, travel to water system sites, and acquiring parts and materials. Mr. Poppe is on call 24 hours per day, 365 days per year. This equates to 8760 hours per year at \$1.37 per hour.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced August 16, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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UTC STAFF DATA REQUEST NO. 8:

Please provide a copy of the final report from the contractor that repaired the well at Echo Glenn showing the well is producing the proper capacity and or maintaining proper levels in the system's reservoir.

WWS Response to Data Request No. 8:

WWS does not possess the final report. Valley Pump and WWS disagree on the final price of the well rehabilitation effort. Valley Pump contends that WWS owes approximately \$14,000. WWS disagrees and refuses to pay that amount. Valley Pump will not complete or provide the final paperwork based on this dispute. It is important to note that since the well rehabilitation, and verbal report of 60 gpm well production rate, the reservoir has remained full with no importation of water.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced August 16, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 9:

For the period of January 1, 2022, through present, please provide all company communications (verbal, email, written, etc.) notifying of, responding to, or discussing boiled water advisories. For each boil water advisory, identify the water system by Department of Health number and include the start and end dates of such advisory. For each communication, please specify the water system by Department of Health number, the date, and the participants.

WWS Response to Data Request No. 9:

Echo Glen Water System, 27510D.

Date	Type	Participants	Subject
July 5, 2023	Verbal	John Poppe & Derek Pell	Need Boil Water Advisory
July 5, 2023	Email	John Poppe & Shelly Cline	Communicating Boil Water Advisory
July 7, 2023	Public Notice	DOH	Health Advisory Summary
July 10, 2023	Email	Derek Pell to Lynn Schneider, Carina Elsenboss, John Poppe	Summary of Pell/Poppe Phone Call & Health Advisory Summary
August 7, 2023	Letter	DOH to John Poppe	Address Outages & Mitigate Health Risks
September 20, 2023	Email	John Poppe to Shelly Cline	Boil Water Advisory Still in Effect
September 21, 2023	Email	John Poppe to Shelly Cline	Well Rehab Update
September 26, 2023	Email	John Poppe to Jon Clements, et. al	Well Update
September 27, 2023	Emails	John Poppe to Dave Sutfin, John Earl, et. al	Boil water advisory still in effect; should be lifted after testing; well production.
September 28, 2023	Email	John Poppe to Shelly Cline	Summary of Trucking Water Expenses

September 30, 2023	Email	John Poppe to Shelly Cline	Boil Advisory Lifted
November 1, 2023	Email	Derek Pell to John Poppe et. al	Inquiry on Well Status and Boil Advisory Efforts
November 2, 2023	Email	John Poppe to Derek Pell et. al	Response to Derek Pell Inquiry
November 3, 2023	Email	John Poppe to Derek Pell et. al	Will Provide Response to August 7, 2023 Letter
November 8, 2023	Letter	John Poppe to DOH	Answer to August 7, 2023 Letter
November 8, 2023	Email	John Poppe to Derek Pell et. al	Answer to August 7, 2023 Letter
July 19, 2024	Email	Derek Pell to David Sutfin, John Poppe, et. al	Response to David Questions

See communications attached as Response to DR 9.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced August 16, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 10:

For the period of January 1, 2022, through present, please provide all company communications (verbal, email, written, etc.) to and from customers regarding the following:

1. Questions about system pressure
2. Complaints about system pressure
3. Notices related to system pressure
4. Tests or assessments done by the company related to system pressure
5. For each of the above, identify the water system by Department of Health number, the date of the communication, and the participants.

WWS Response to Data Request No. 10:

Echo Glen 27510D

- **Since October 2023, Echo Glen has had pressure issues due to equipment or well production problems. Three pressure issues were the result of Puget Sound Energy power failures. WWS has requested that information from PSE.**
- **Please see all available communications attached as Response to DR 9.**

Maple Haven 51150M

- **The pressure issue was because of a leak on the customer's side of the meter. The customer filed a complaint with the UTC, and the UTC found in favor of WWS.**
- **All communications in this matter were verbal.**

MPVK 473128

- **The pressure issue was caused by a leak from a piping failure on the customer's service line as well as tree roots on the water main that was supplying water to the customer.**
- **All communications in this matter were verbal.**

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced August 16, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 11:

For the period January 2, 2022, through present, please provide all company communications (verbal, email, written, etc.) to and from Department of Health regarding the following:

- a. Questions about system pressure
- b. Complaints about system pressure
- c. Notices related to system pressure
- d. Tests or assessments done by the company related to system pressure
- e. For each of the above, identify the water system by Department of Health number, the date of the communication, and the participants.

WWS Response to Data Request No. 11:

See WWS Response to DR 9.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced August 16, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 12:

For each water system identified by its Department of Health number, please provide the number of meters installed on each system.

WWS Response to Data Request No. 12:

Echo Glen – 26
Crystal Creek – 41
Wolf – 0
Hinley Hills – 0
MPVK – 0
Deer Trail – 0
Noll Road – 0
Salmon Drive – 4
Maple Haven - 6

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced August 16, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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GENERAL INSTRUCTION FOR DISCOVERY

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DATA REQUESTS DIRECTED TO: Washington Water
REQUESTED BY: Michael Young

UTC STAFF DATA REQUEST NO. 10:

For the period of January 1, 2022, through present, please provide all company communications (verbal, email, written, etc.) to and from customers regarding the following:

1. Questions about system pressure
2. Complaints about system pressure
3. Notices related to system pressure
4. Tests or assessments done by the company related to system pressure
5. For each of the above, identify the water system by Department of Health number, the date of the communication, and the participants.

WWS Supplemental Response to Request No. 10:

See attached for WWS Supplemental Response to DR 10.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced August 21, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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GENERAL INSTRUCTION FOR DISCOVERY

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DATA REQUESTS DIRECTED TO: Washington Water
REQUESTED BY: Michael Young

UTC STAFF DATA REQUEST NO. 13:

Please describe the Company's process for communicating with customers regarding Boil Water Advisories, outages, water pressure issues, and other problems with water supply.

WWS Response to Data Request No. 13:

Boil water advisories – WWS communicates with customers via email.

Outages – WWS communicates with customers verbally.

Water pressure issues – WWS communicates with customers verbally or by email.

Other problems – WWS communicates with customers verbally or by email.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced August 23, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 14:

Please describe the process the company followed, and specific actions taken, to distribute communications to customers related to the Boil Water Advisory issued on or about August 7, 2023, and any Boil Water Advisory issued between June 1, 2023 and September 1, 2023.

WWS Response to Data Request No. 14:

- **July 5, 2023 - WWS had a telephone conversation with DOH about the need for a boil water advisory.**
- **July 5, 2023 – WWS emailed Echo Glen customers about the boil water advisory and instructed them to boil drinking water.**
- **September 20, 2023 – WWS emailed Echo Glen customers that the boil water advisory was still in effect.**
- **September 27, 2023 – WWS emailed responses to various Echo Glen customers’ questions about the boil water advisory.**
- **September 30, 2023 – WWS emailed Echo Glen customers that the water quality testing came back negative, so the boil water advisory was lifted.**

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced August 23, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 15:

For the Boil Water Advisory issued on or about August 7, 2023, please state when that Advisory was lifted. Please provide all documents showing when the Advisory was lifted.

WWS Response to Data Request No. 15:

The boil water advisory was lifted on September 30, 2024. Please see responsive documents attached to WWS's response to Request No. 9.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced August 23, 2024.**
- **Response prepared by Alysa M. Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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GENERAL INSTRUCTION FOR DISCOVERY

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DATA REQUESTS DIRECTED TO: Washington Water
REQUESTED BY: Mike Young and Jeanine Leggett

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UTC STAFF DATA REQUEST NO. 16:

Please provide the general ledger detail that was provided in the Company's response to Staff Data Request No. 1 in an Excel format. Please refer to WAC 480-07-140(6)(a).

WWS Response to Data Request No. 16:

Please see the general ledger in Excel, attached as Request No. 16.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced October 15, 2024.**
- **Response prepared by Alysa Grimes, John Poppe, and Lloyd Gibbons for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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UTC STAFF DATA REQUEST NO. 17:

Please provide, broken down by DOH System ID number, the number of meters installed in each calendar year starting with 2018 through August 2024.

WWS Response to Data Request No. 17:

Please see the Response, attached as Request No. 17.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced October 15, 2024.**
- **Response prepared by Alysa Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 18:

Please provide a detailed aging of the \$61,264 Account Receivable reported in the company model. Please identify by DOH system ID number the number of customers and dollar amount outstanding as of the end of the test period. Please also indicate whether any of the outstanding amounts have been collected since the end of the test period. ← email that one outstanding amount came later.

WWS Response to Data Request No. 18:

Please see the detailed aging of the \$61,264 account receivable, attached as Request No. 18.

One outstanding amount was collected since the end of the test period. That account was a Maple Haven account, MH5016, in the amount of \$5,357.75, which was collected on July 24, 2024.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced October 15, 2024.**
- **Response prepared by Alysa Grimes, John Poppe, Lloyd Gibbons, and Lindsay Weaber for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 19:

Please reconcile the revenue total \$72,000 provided in the Company's response to Staff Data Request No. 1 and the \$80,976 revenue figure provided in the company's GRC model.

WWS Response to Data Request No. 19:

Please see the revenue reconciliation, attached as Request No. 19.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced October 15, 2024.**
- **Response prepared by Alysa Grimes, John Poppe, Lloyd Gibbons, and Lindsay Weaber for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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UTC STAFF DATA REQUEST NO. 20:

Please provide all rental contracts and agreements for the \$6,720 listed in the GRC model and any supporting calculations.

WWS Response to Data Request No. 20:

There are no rental contracts or agreements. However, please see the data supporting the \$6,720, including rent checks, attached as Request Nos. 20 & 21.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced October 15, 2024.**
- **Response prepared by Alysa Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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UTC STAFF DATA REQUEST NO. 21:

Please provide invoices for the \$13,482 for Repairs listed in the GRC model. Please identify to which DOH system ID Number each invoice applies.

WWS Response to Data Request No. 21:

Please see the supporting documents, attached as Request Nos. 20 & 21.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced October 15, 2024.**
- **Response prepared by Alysa Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

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GENERAL INSTRUCTION FOR DISCOVERY

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**DATA REQUESTS DIRECTED TO: Washington Water
REQUESTED BY: Commission Staff**

**UTC STAFF DATA REQUEST NO. 22:
Re: Poppe, Exh. WWS-13, Legal Invoice Summary**

Please answer the following questions:

- a. Please explain for each transaction listed in the summary the services that were rendered and the benefit to customers.
- b. Please provide invoices for the services listed in this summary. For each service, please specify the following:
 - i. The UTC Docket Number,
 - ii. Whether the services were rate-case related,
 - iii. Whether the services were complaint-case related,
 - iv. Whether the services were related to the complaint filed by the Commission in Docket UW-230598,
 - v. Whether the services were related to surcharge filings, and if so, which surcharge request identified by Docket Number (UW-230598, UW-230997, and UW-240079),
 - vi. Whether the services were general legal fees,
 - vii. How the fees were related to regulated services by broad category (e.g., litigation, client advice, etc.).

WWS Response to Data Request No. 22:

- a. **Please see the invoices that support the summary of services, attached as Request No. 22, which list the services that were rendered for the customers. The benefits to the customers include:**
(230997): Ensuring that the Company was reimbursed for trucked water expenses, which ensures that the Company is funded and able to provide those, or other, services, if necessary.
(240079): Ensuring that the general rate is fair and applicable to all customers, as well as protecting customers from unrealistic and exorbitant rates.
(230598): Ensuring the State proves its claims before instituting large penalties.
- b. **Please see attached for the invoices. Each invoice has been color-coded, with each invoice entry highlighted with a color. Each color corresponds to a different docket number, or combination of docket numbers. The color key is as follows:**
Blue: UW-240079
Yellow: UW-230598
Green: UW-240079 and UW-230598
Pink: UW-230997
Sometimes the invoice entry applies to a combination of different dockets, which is indicated by multiple colors on one invoice entry. In that scenario, because the firm uses block billing, counsel has reviewed emails, notes, and applicable documents to

estimate a fair division of time. This is also noted on the invoices. We believe this addresses subsections (b)(i)-(v).

Regarding (b)(vi): Counsel does not know what “general legal fees” are. If “general legal fees” are those that are not applicable to any particular UTC docket number, then there are none. Each invoice entry applies to one or more specific UTC docket numbers.

Regarding (b)(vii): All fees are related to litigation because each docket number at issue was/is in adjudication.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced February 12, 2025.**
- **Response prepared by Alysa Grimes and John Poppe for WWS.**
- **Alysa Grimes can testify on behalf of WWS regarding this information.**

**UTC STAFF DATA REQUEST NO. 23:
Re: Poppe, Exh. WWS-6T at 7:14-17**

Mr. Poppe states that Washington Water and Department of Health “discussed and agreed” to a Boil Water Advisory related to Echo Glen’s water pressure issues. Please provide a description of the discussion between Department of Health and Washington Water, and provide any documentation confirming or memorializing such discussion.

WWS Response to Data Request No. 23:

Derek Pell said, “John, I think we ought to have a boil water advisory.” John Poppe agreed and emailed customers regarding the boil water advisory the same day. This was a verbal conversation, but one that has been recounted to UTC Staff in prior documents which are already in Staff’s possession.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced February 12, 2025.**
- **Response prepared by Alysa Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

**UTC STAFF DATA REQUEST NO. 24:
Re: Poppe, Exh. WWS-6T at 13:16-20**

Mr. Poppe states that he sought multiple bids to rehabilitate the Echo Glen well. Please state how many bids Mr. Poppe sought, what contractors he contacted, and whether he received any bids other than from Valley Pump. Please provide any documents that provide responses from drillers other than Valley Pump to Mr. Poppe's requests for bids.

WWS Response to Data Request No. 24:

In addition to Valley Pump, Mr. Poppe sought bids from Tacoma Pump & Drilling and an outfit in Shelton. Tacoma Pump & Drilling would not agree to do a well rehabilitation and estimated a new well at \$60,000. UTC Staff is already in possession of this estimate. The Shelton company would not agree to rehabilitate the well because it was outside of its service area. WWS did not receive a written estimate from the Shelton company because of the service area issue.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced February 12, 2025.**
- **Response prepared by Alysa Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 25:

Re: Poppe, Exh. WWS-6T at 8:9-13

Mr. Poppe states that all other well drilling companies were already booked or not available to step in when the Valley Pump driller was injured. Please state how many bids Mr. Poppe sought, other than the one obtained by Derek Pell of Department of Health; what contractors he contacted; and whether he received any bids. Please provide any documents that provide responses from drillers other than Valley Pump to Mr. Poppe's requests for bids.

WWS Response to Data Request No. 25:

Derek Pell did not request any bids. He merely confirmed what Mr. Poppe had already told UTC Staff. Mr. Poppe asked the Shelton company if it would reconsider, but it said no. Mr. Poppe also spoke to Red's Electric Motors Inc. in Bremerton to see if it would clean the well screen, but it said no. These were verbal conversations.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced February 12, 2025.**
- **Response prepared by Alysa Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

**UTC STAFF DATA REQUEST NO. 26:
Re: Poppe, Exh. WWS-6T at 16:7-10**

Please answer the following questions:

- a. Mr. Poppe refers to a sanitary survey. Please provide a copy of the sanitary survey along with the letter from Department of Health responding to the sanitary survey.
- b. Mr. Poppe states that he provided the Department of Health with a meter installation schedule. Please provide a copy of the meter installation schedule Washington Water Supply, Inc., provided to the Department of Health.
- c. Please specifically state whether Department of Health agreed to the meter installation schedule referred to in Mr. Poppe's testimony.
- d. Please state with particularity why Mr. Poppe believes that Department of Health and Washington Water Supply, Inc., have a verbal agreement regarding meter installation.
- e. Please provide the number of meters installed, by system, for calendar years 2023, 2024, and any installations scheduled for 2025 including the approximate month of the proposed installation.

WWS Response to Data Request No. 26:

- a. **Please see a portion of the sanitary survey compliance report, attached as Request No. 26(a). Mr. Poppe has requested a copy of the full sanitary survey from DOH. This will be provided as soon as it is in Mr. Poppe's possession.**
- b. **Mr. Poppe verbally discussed a meter installation schedule with DOH, which is reflected in the document provided above pursuant to 26(a).**
- c. **Yes. The DOH agreed to Mr. Poppe's meter installation schedule.**
- d. **Please see the document produced above pursuant to 26(a).**
- e. **Mr. Poppe has already provided meter installation information for 2023 to UTC Staff. No meters were installed in 2024 due to Mr. Poppe's legal fees resulting from the UTC's complaint against him.**

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced February 12, 2025.**
- **Response prepared by Alys Grimes and John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

**UTC STAFF DATA REQUEST NO. 27:
Re: Poppe, Exh. WWS-6T at 17:10-13**

Mr. Poppe testifies, “Also, I believed that the Commission had given WWS permission to renew the approved surcharge without a new filing because the final trucking costs were unknown.” Please answer the following questions:

- a. Please confirm that Mr. Poppe is referring to the surcharge related to the trucked-in water expense. If your answer is something other than confirmation, please explain.
- b. Please confirm that Washington Water Supply, Inc., implemented a Commission-approved surcharge for trucked-in water in Docket UW-230589 and recovered \$7,560.00 in surcharges. Please confirm that this left \$13,709.90 of the trucked-in water expense to be collected. If your answer is something other than confirmation, please explain.
- c. Please confirm that the Commission approved recovery of the remaining \$13,709.90 through a surcharge in Docket UW-230997. If your answer is something other than confirmation, please explain.

WWS Response to Data Request No. 27:

- a. Yes.
- b. Yes.
- c. Yes.
- d. Yes.

WAC 480-07-405(7)(a)(iii) Requirements:

- Response produced February 12, 2025.
- Response prepared by Alysa Grimes and John Poppe for WWS.
- John Poppe can testify on behalf of WWS regarding this information.

/s/ Alysa Grimes, WSBA No. 54358
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Dockets UW-240079 and UW-230598
WWS Responses to
UTC Staff Data Request Nos. 28 - 35 to Washington Water
March 4, 2025
Page 1

GENERAL INSTRUCTION FOR DISCOVERY

Please review all Excel documents and workpapers for hidden cells. Hidden cells include hidden worksheets, columns, rows and ranges. Please ensure that all items provided pursuant to these requests do not contain any hidden cells or formulas.

DATA REQUESTS DIRECTED TO: Washington Water
REQUESTED BY: Michael Young

Dockets UW-240079 and UW-230598
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UTC STAFF DATA REQUEST NO. 28:

Please provide the name and address for the ready-to-serve connection listed in the company's data response to Staff Data Request No. 1 and any written or oral agreement as to the provision of water at this location.

WWS Response to Data Request No. 28:

Richard Fout, 20807 229th Ave SE, Maple Valley, WA 98038

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced March 4, 2015.**
- **Response prepared by John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 29:

Please provide the written agreement between John Poppe and/or Washington Water Supply and Kitsap Industrial Group for rent.

WWS Response to Data Request No. 29:

There is no written agreement.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced March 4, 2015.**
- **Response prepared by John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 30:

Please provide invoices, billing statements, and receipts for payments made to Kitsap Industrial Group by Washington Water Supply during the test year as listed in the company's general ledger account 7180-Rent. In the absence of any of this documentation, please provide copies of cancelled checks with the bank account and routing numbers redacted.

WWS Response to Data Request No. 30:

WWS has already provided rent checks to Staff in its responses to previous Data Requests.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced March 4, 2015.**
- **Response prepared by John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 31:

Please provide invoices, billing statements, and receipts for payments made to Ryan Poppe by Washington Water Supply during the test year as listed in the company's general ledger account 7280-Telephone. In the absence of any of this documentation, please provide copies of cancelled checks with the bank account and routing numbers redacted.

WWS Response to Data Request No. 31:

WWS has already provided checks to Ryan Poppe for the cell phone to Staff in its responses to previous Data Requests.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced March 4, 2015.**
- **Response prepared by John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 32:

Please provide invoices, billing statements, and receipts for payments made by Washington Water Supply during the test year as listed in the company's general ledger account 7400-Transportation Expense, totaling \$8,680.75. In the absence of any of this documentation, please provide copies of cancelled checks with the bank account and routing numbers redacted.

WWS Response to Data Request No. 32:

WWS has already provided transportation documents to Staff in its responses to previous Data Requests.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced March 4, 2015.**
- **Response prepared by John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 33:

Please provide invoices, billing statements, and receipts for payments made by Washington Water Supply during the test year as listed in the company's general ledger account 7422-Outside Accounting, totaling \$7,627.00. In the absence of any of this documentation, please provide copies of cancelled checks with the bank account and routing numbers redacted.

WWS Response to Data Request No. 33:

WWS has already provided the checks for outside accounting to Staff in its responses to previous Data Requests. See attached for Lloyd Gibbons' 2024 invoices. Lindsay Weaber has no contract and her tasks include PO Box mail pickup, customer payment entry, account inquiry response, data summary and email to Lloyd Gibbons for final monthly and annual reports.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced March 4, 2015.**
- **Response prepared by John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 34:

Please provide the company's income statement and balance sheet included in the filing for the company's last general rate increase request to the Commission.

WWS Response to Data Request No. 34:

WWS has already provided the income and balance sheet to Staff in its responses to previous Data Requests.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced March 4, 2015.**
- **Response prepared by John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

UTC STAFF DATA REQUEST NO. 35:

Mr. Poppe testifies in Exhibit WWS-14T at page 5, line 3 that additional testimony will be elicited at the evidentiary hearing. Please state whether Mr. Poppe intends to offer additional direct testimony at the hearing, and if so, please state what that testimony will be. Conversely, please state whether Mr. Poppe is referring to testimony he may provide under cross examination at the hearing.

WWS Response to Data Request No. 35:

Mr. Poppe will offer additional direct testimony at the hearing regarding UTC Commissioners, Echo Glen Water System users, all contractors and/or persons used by WWS, DOH staff, UTC Staff, DOE staff, all electronic data and metadata, public records requests, WAC's, RCW's, Staff policies and procedures for general rate cases, and Staff choices in calculating the suggested general rate in this case.

WAC 480-07-405(7)(a)(iii) Requirements:

- **Response produced March 4, 2015.**
- **Response prepared by John Poppe for WWS.**
- **John Poppe can testify on behalf of WWS regarding this information.**

/s/ Alysa M. Grimes, WSBA No. 54658
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