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June 17, 2020

Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
P. O. Box 47250  
Olympia, WA 98504-7250

RE: *Blue Rock Water Company, LLC*  
Docket UW-200378

Dear Mr. Johnson:

This is Commission Staff's response to the June 12, 2020, letter filed by counsel Rick Finnigan, on behalf of Blue Rock Water Company, LLC (currently Iliad Water Company, LLC, pending a name change). In that letter, citing a good faith dispute with Commission Staff, Mr. Finnigan requests an informal ruling from the Commission that the transfer of ownership interest in Iliad Water Company, LLC from Iliad, Inc. to Blue Rock Management, LLC is not subject to RCW 80.12, the transfer of property statute. In this response, although it is of the view that the transfer of property statute applies to the transaction, Commission Staff addresses only the procedural questions raised by Mr. Finnigan's letter.

If time were not of the essence, Mr. Finnigan likely would have filed a petition for a declaratory order under RCW 34.05.240 of the Administrative Procedure Act and WAC 480-07-930, a Commission rule. In his letter he indicates a willingness to file an application for Commission approval of the transfer of property if the Commission determines that it is necessary.

Commission Staff is not opposed to placing this matter on the June 25, 2020, open meeting agenda, at which time the Commission could entertain both the proposed name change from Iliad Water Company, LLC to Blue Rock Water Company, LLC, and the legal question as to whether the proposed transaction is subject to the Commission's jurisdiction under the transfer of

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property statute. Commission Staff encourages Iliad/Blue Rock to file an application for property transfer with the Commission for consideration at the June 25, 2020 open meeting.

Thank you for your consideration.

Sincerely,

/s/ Harry Fukano, WSBA No. 52458  
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