

Docket # UW070944

Domestic water rights of 183 AFY. What does that mean?

The RU water treatment plant may process 183 AFY, BUT only 149 AFY are available for consumption by the customers of RU. 34 AFY are used to backwash the filters and are just lost through leaks and the likes.

In 1997 the 183 AFY were approved for RU's usage. In 2002 an additional 100 AFY were approved, bringing the total approved for the RU service area to 293 AFY. What for? The domestic drinking water was designated for the build out of the RU service area and the resort – 465 residences and 109 equivalent connections for the resort, a total of 574. The equivalent resort connections increased from 109 to 132 as authorized by the DOH in 2004: thus, now totaling 597 connections, to which an additional but not determined number of connections would be included. In other words, this original description was expanded to include further development within the resort area. An aggressive leak detection program and conservation would reduce the then current usage to 285 gallons/connection/day.

If the estimated count of 597 connections is used as the basis (keeping in mind that this count is not complete) :-

285 gallons/year/connection for 597 connections is 191 AFY of drinking water or 227 AFY of water to be processed. 227 AFY to be processed is low because the expansion count was not included. Use the 293 AFY of water rights, with 10 AFY prudently maintained as spare as it was assumed that leakage would not increase with throughput (not realistic), yields 244 AFY of domestic drinking water. The table below shows water to be processed, expected drinking water, connections and loss or wastage.

Water to be processed, AFY	average consumption per connection per day	connections	drinking water AFY	loss AFY
227	285	597	191	36
219	285	573	183	36
183	285	467	149	34
283 +10 spare	285	764	244	39

With a little study it is clear that 183 AFY of water to be processed will not yield enough drinking water for build out with the current water loss and backwash requirements. The 1997 permit build out requires about 40+ additional AFY or 223+ AFY to be transferred back to RULLC free of charge. To achieve 508 connections that are connected or have paid connection fees, more than 10 AFY are required. Additional AF is not prudent it is mandatory. Until this change has been negotiated or until the WUTC can resolve these

issues, both the proposed rate increase and the proposed sale should be delayed. It also raises the question why 293 AFY was not transferred back to RULLC free of charge since the intent in issuing the permits was for RULLC to have and hold said water rights for build out of their service area.

We request the WUTC to resolve these issues. Thank you

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