

BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

SARAH HAND AND GRETCHEN HAND,  
a married couple

Complainant,

v.

RAINIER VIEW WATER COMPANY, INC.,

Respondent.

DOCKET UW 170924

**SARAH HAND'S EXHIBIT 59 TO  
CROSS EXAMINATION**

**EXHIBIT 59**

**TO CROSS EXAMINATION OF BOB BLACKMAN AND RACHEL STARK**

**July 25, 2018**

Sarah Hand's First Request For Production Of  
Documents to RVWC with Response dated April 19, 2018

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BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

SARAH HAND

Complainant,

v.

RAINIER VIEW WATER COMPANY, INC.,

Respondent.

DOCKET UW 170924

SARAH HAND'S FIRST SET OF  
REQUEST FOR DOCUMENTS TO  
RAINIER VIEW WATER COMPANY  
**AND OBJECTIONS AND RESPONSES  
THERETO**

WAC 480-07-405 (7)

SET #1

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You are hereby served with Complainant's First Set of Request for Documents to Rainier  
View Water Company, Inc.

**INSTRUCTIONS**

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1. You are required to produce verified responses to these discovery requests  
within ten days.

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2. In responding to these discovery requests, please answer based on all  
information, documents and things available to it, including information and documents in the  
possession or control of its investigators, agents, representatives, attorneys, investigators for its  
attorneys, and any other persons acting on its behalf.

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**DEFINITIONS**

The following definitions shall apply when used in these discovery requests:

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1. ***You, your, or Respondent*** refers to the Rainier View Water Company, Inc.; its  
past and present employees, agents, governing persons, attorneys, investigators, consultants,  
accountants, and anyone else acting on its behalf.

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SARAH HAND'S FIRST SET OF  
INTERROGATORIES TO RAINIER VIEW WATER  
COMPANY INC. **AND OBJECTIONS AND  
RESPONSES THERETO** - 1  
00567-4500 5483482.docx

**PREG O'DONNELL & GILLET** PLLC  
901 FIFTH AVE., SUITE 3400  
SEATTLE, WASHINGTON 98164-2026  
TELEPHONE: (206) 287-1775 • FACSIMILE: (206) 287-9113



1 **REQUEST FOR DOCUMENTS NO. 2:** Produce your annual consumer confidence water  
2 quality report for Southwood System for 2017.

3 **ANSWER:**

4 **The Southwood Consumer Confidence Report is not ready to be delivered to customers at this**  
5 **time.**

6 **Discovery is ongoing and this discovery response may be supplemented. Defendant reserves the**  
7 **right to supplement this response as additional information becomes available.**

8 **REQUEST FOR DOCUMENTS NO. 3:** Produce all service orders or water quality  
9 complaints from any customers supplied with water from the Fir Meadows wells between  
10 October 1, 2017 and the present.

11 **ANSWER:**

12 **See attached Report BATES: RVWC-UTC 000002.**

13  
14 **REQUEST FOR DOCUMENTS NO. 4:** Produce all written or electronic communications  
15 between Robert Blackman and any Rainier View Water Company employee or agent regarding  
16 responding to any complaint or request for service from Sarah Hand.  
17

18 **ANSWER:**

19 **Respondent RAINIER VIEW WATER COMPANY, INC answers as follows:**

20  
21 **No such documents exist.**

22 **REQUEST FOR DOCUMENTS NO. 5:** Produce all written or electronic communication  
23 between Rainier View Water Company and the Department of Health since January 1, 2018  
24 regarding:  
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- 1 • brown water complaints from customers residing in Springwood Estate or supplied with  
2 water from the Fir Meadows wells  
3 • testing the quality of water supplied to any customer from the Fir Meadows wells  
4 performance of the filtration system installed on any Fir Meadows well.

5 **ANSWER:**

6 See Fir Meadows Manganese Treatment Results BATES: RVWC-UTC 000001.  
7

8 **REQUEST FOR DOCUMENTS NO. 6:** Produce all written or electronic communications  
9 between you and any customer in Pierce County regarding water quality since January 1, 2018.  
10

11 **ANSWER:**

12 **Objection. This REQUEST is vague and ambiguous as to scope and unduly burdensome.**

13 **In order to obtain this information Respondent would have to manually review the**  
14 **account files of each of its 18,000 accounts. Further, such a review would be duplicative**  
15 **because the record of any work orders from customers regarding water quality would be**  
16 **evident in the document produced in response to Request Number 3.**

17 DATED this 19 day of April, 2018.

18 PREG O'DONNELL & GILLETT PLLC

19 By 

20 Eric P. Gillett, WSBA #23691

21 Daniel W. Rankin, WSBA #49673

22 Attorneys for Respondent Rainier View Water  
23 Company, Inc.  
24  
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26  
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1 **DECLARATION OF SERVICE**

2 The undersigned declares under penalty of perjury under the laws of the State of  
3 Washington that on this day the undersigned caused to be served in the manner indicated below  
4 a copy of the foregoing document directed to the following individuals:  
5

6 **Counsel for Complainant Sarah Hand:**

7 Nigel S. Malden, Esq.  
8 Nigel S. Malden Law, PLLC  
9 711 Court A, Suite 200  
10 Tacoma, WA 98402

6 **Commission Staff**

7 Jeff Roberson  
8 Office of the Attorney General  
9 Utilities and Transportation Division  
10 1400 S. Evergreen Park Drive SW  
11 P.O. Box 40128  
12 Olympia, WA 98504-0128

- 13  Via Messenger
- 14  Via Facsimile – (844) 273-6067
- 15  Via U.S. Mail, postage prepaid
- 16  Via Overnight Mail, postage prepaid
- 17  Via Court E-Service or email to:  
18 *nm@nigelmaldenlaw.com*

- 13  Via Messenger
- 14  Via Facsimile – (844) 273-6067
- 15  Via U.S. Mail, postage prepaid
- 16  Via Overnight Mail, postage prepaid
- 17  Via Court E-Service or email to:  
18 *jrobertson@utc.wa.gov*  
19 *sbrown@utc.wa.gov*  
20 *bdemarco@utc.wa.gov*

21 DATED in Seattle, Washington, this 17th day of April, 2018.

22   
23 \_\_\_\_\_  
24 Ana I. Todakonzie

## Fir Meadows 4 Iron & Manganese Treatment Results

Title	Date and Time	Site	Iron MG/L		Iron MG/L After Treatment		Iron Test Method		Manganese Before Treatment		Manganese After Treatment		Manganese Test Method		GPM	CIZ residual	Test Taken By
			Before Treatment	0.02	0.03	Colorimeter	0.13	0.00	Colorimeter	0.58	0.42						
	3/16/2018 10:45	Fir Meadows 4	0.02	0.03	Colorimeter	0.13	0.00	Colorimeter	315	0.58	Candi Shelton						
	3/1/2018 13:05	Fir Meadows 4	0.04	0.00	Colorimeter	0.13	0.00	Colorimeter	325	0.42	Candi Shelton						
	2/16/2018 8:10	Fir Meadows 4	0.00	0.00	Colorimeter	0.13	0.00	Colorimeter	315	0.50	Candi Shelton						
	2/8/2018 14:15	Fir Meadows 4	0.00	0.00	Colorimeter	0.12	0.01	Colorimeter	297	0.44	Paul Tatum						
	1/11/2018 14:20	Fir Meadows 4	0.02	0.00	Colorimeter	0.13	0.00	Colorimeter	295	0.59	Candi Shelton						
	12/14/2017 8:05	Fir Meadows 4	0.02	0.00	Colorimeter	0.14	0.01	Colorimeter	305	0.75	Candi Shelton						
	11/28/2017 12:35	Fir Meadows 4	0.01	0.01	Colorimeter	0.13	0.00	Colorimeter	305	0.63	Candi Shelton						
	11/9/2017 13:05	Fir Meadows 4	0.02	0.00	Colorimeter	0.12	0.01	Colorimeter	305	0.79	Candi Shelton						
	10/23/2017 11:35	Fir Meadows 4	0.00	0.01	Colorimeter	0.14	0.01	Colorimeter	295	0.75	Candi Shelton						
	10/5/2017 10:15	Fir Meadows 4	0.02	0.02	Colorimeter	0.13	0.01	Colorimeter	305	0.73	Candi Shelton						
	9/21/2017 13:55	Fir Meadows 4	0.03	0.01	Colorimeter	0.13	0.01	Colorimeter	300	0.44	Candi Shelton						
	9/7/2017 14:50	Fir Meadows 4	0.04	0.01	Colorimeter	0.14	0.01	Colorimeter	315	0.54	Candi Shelton						
	8/30/2017 9:35	Fir Meadows 4	0.04	0.06	Colorimeter	0.14	0.02	Colorimeter	320	0.55	Candi Shelton						
	8/17/2017 8:25	Fir Meadows 4	0.03	0.00	Colorimeter	0.14	0.01	Colorimeter	325	0.49	Candi Shelton						
	7/26/2017 8:05	Fir Meadows 4	0.05	0.02	Colorimeter	0.12	0.01	Colorimeter	345	0.65	Candi Shelton						
	7/6/2017 15:00	Fir Meadows 4	0.02	0.02	Colorimeter	0.11	0.00	Colorimeter	360	0.64	Candi Shelton						

Sound Zone Customer Service Orders by Quality - October 1, 2017 - April 12, 2018

	ZONE	Account #	Service #	Created Comments	DATE
1	MAINTENANCE	Sound 12300040000	9104574	Customer located @ 9320 220th St Ct E is having problems with strong chemical Odor/Taste. Flush + Door hanger	10/11/2017
2	MAINTENANCE	Sound 11022680000	9104583	Customer called and asked us to flush their line because of dirty water.	10/11/2017
3	MAINTENANCE MISC	Sound 11017880001	9105078	BROWN WATER FLUSH SERVICE	10/23/2017
4	MAINTENANCE MISC	Sound 13920116304	9105468	BLACK WATER FLUSH SERVICE	11/1/2017
5	MAINTENANCE MISC	Sound 12300582102	9105658	Customer requests that we flush his service.	11/13/2017
6	MAINTENANCE MISC	Sound 12300582102	9106151	Customer reported "white flakes" in their water. Wanted to know if it was safe to drink. Please speak with customer and determine the issue if possible.	11/22/2017
7	MAINTENANCE MISC	Sound 13920117504	9106823	BLACK WATER FLUSH SERVICE	12/20/2017
8	WATER Flush Meter	Sound 13701200002	9107012	Customer says his water tastes horrible and requests that we flush his line to try and clean it up a little bit.	1/5/2018
9	MAINTENANCE MISC	Sound 11018200009	9107016	BRONW WATER FLUSH SERVICE	1/5/2018
10	WATER Flush Meter	Sound 15518700000	9107071	Cusatomer reports water is turning dark grey and wont go away. Flush + Door hanger.	1/10/2018
11	MAINTENANCE MISC	Sound 11016340001	9107788	BLACK WATER FLUSH SERVICE LEAVE HANGER	1/25/2018
12	MAINTENANCE MISC	Sound 14440380006	9107883	FLUSH SERVICE LEAVE HANGER	1/29/2018
13	MAINTENANCE MISC	Sound 13950717006	9107901	BROWN WATER FLUSH SERVICE LEAVE HANGER	1/31/2018
14	WATER Flush Meter	Sound 11022680000	9107907	Customer reports water is now "Pure" mud. Flush + Door hanger.	1/31/2018
15	MAINTENANCE MISC	Sound 13920121103	9107953	Customer Emailed the info box @ 12:55am. "We flushed a toilet and noticed brown water, we tried the other toilets to make sure it wasn't the toilet and the water got darker. Same with the water in the tub" Please flush service and leave hanger.	2/5/2018
16	WATER Flush Meter	Sound 14487511204	9107980	Customer reports very dark water and is Scared. Flush + Door hanger	2/6/2018
17	MAINTENANCE MISC	Sound 11030500001	9108577	BROWN WATER FLUSH SERVICE	3/1/2018
18		Sound 13904006010	9108993	Customer called and reported a sulfur smell in her water. Please get a chlorine residual and flush the meter.	3/19/2018