

UW-040375

# HALL ENGINEERING ASSOCIATES

10 SOUTH AUBURN ST • KENNEWICK, WA 99336 • (509) 582-2200 • FAX: (509) 586-2897

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94 JUL 22 AM 7:31  
STATE OF WASH  
UTIL AND TRANS  
COMMISSION

Carole J Washburn, Secretary  
Washington Utilities and Trade Commission  
P O Box 47250  
Olympia WA 98504-7250

RE: Threshold Rule Change

Dear Secretary Washburn;

I am a consulting engineer for several water purveyors, one of whom is subject of your commission's regulations.

My suggestion for changing the threshold for regulation is to tie the new threshold to some percentage of the average of the public water systems' annual revenue per customer. Furthermore, I suggest the threshold be regionalized, to account for the difference in climates. Most of the water consumed on the east side is for irrigation, whereas irrigation is mostly unnecessary on the west side.

Making the threshold relative to the local public rates, seems reasonable since the public rates must be justified to local representatives of the consumers, i.e. city councils. So that when a private purveyor wants to exceed some percentage of that average, a flag goes up and that purveyor must come to the commission to justify its rates.

Please add me to the mailing list for notices pertaining to this issue.

Thank you for your consideration.

Sincerely,  
HALL ENGINEERING ASSOCIATES



Gary Hall, PE