## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of

DOCKET NO. UW-040651

REQUEST OF CANTERWOOD WATER COMPANY, INC.

PETITION FOR RELIEF FROM FILING DATE AND FILING METHODOLOGY

For a Revision of its Inverted Rate Structure

In Order No. 1 in this docket, the Commission accepted a petition for accounting treatment filed by Canterwood Water Company, Inc. (Canterwood). As part of that Order, the Commission directed that the Company file revised rates on a revenue-neutral basis. See, paragraph (5) at page 4 of Order No. 1.

In Order No. 2 in this matter, the Commission clarified that the filing date for this revenueneutral filing would be December 31, 2005.

In the course of undertaking its analysis of the revenues received and expenses incurred, Canterwood has come to the conclusion that it must seek a revenue increase in order for rates to be adopted that are fair, just, reasonable and sufficient. It appears to be a waste of resources to make a revenue-neutral filing on December 31, 2005, to be followed by a revenue increase filing shortly thereafter.

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On this basis, Canterwood respectfully requests that the Commission modify Order Nos. 1 and 2 to allow the Company to file for increased rates, rather than simply on a revenue-neutral basis. Such a filing would still meet the purpose of allowing the Commission Staff and other interested parties to review the efficacy of the inverted rate structure filed by Canterwood. However, it would have the advantage of economizing on the expenditure of resources by both Commission Staff and Canterwood in considering not just the rate structure filing, but also whether a rate increase is warranted.

Canterwood further respectfully requests that the filing date for the rate filing be extended to January 31, 2006. Even if the Commission declines to grant the request to modify the basis of the filing, i.e., revenue-neutral, Canterwood respectfully requests that additional time be granted for the filing.

Respectfully submitted this 29th day of November, 2005.

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