

December 20, 2007

Carole J. Washburn, Executive Secretary Washington Utilities and Transportation Commission PO Box 47250 Olympia, WA 98504-7250

RE: Accounting Petition to defer costs associated with Hanukkah Eve Windstorm of 2006

Dear Ms. Washburn;

Washington Water Service Company is asking the UTC permission to file an accounting petition for excess costs incurred as a result of the Hanukkah Eve Windstorm of 2006. Labor and material to maintain water service to approximately 250 systems using portable generators was in excess of \$60,000. While WWSC does recognize the potential for overtime due to unexpected weather events, this far exceeded anything we had experienced in the past.

We admit we have not been timely in filing this petition. Early in 2007 we approached the commission to determine if there were any means to recover a portion of the costs in a future rate filing. All expenditures that we are submitting have been recognized as operating expenses. Due to the timing, part of the expense was reported in December 2006 and the remainder in January 2007. At this time, Washington Water Service Co. does not anticipate filing for rates in 2008.

In addition to losing our previously assigned auditor (Danny Kermode) we were working closely with Rosario Utilities in the preparation of their general rate filing and the Sale and Transfer to WWSC. The filing was submitted on May 10, 2007 and after numerous public meetings, additional data requests and conferencing with UTC staff both were approved on October 1, 2007.

Two worksheets are enclosed that itemize our costs. The first is an itemization of the hours logged by employee. The second lists fuel costs for the generators and system repair costs.

Please do not hesitate to call me at 253-851-3422 ext 1105, if you have any questions.

Sincerely,

Charlene E. Pratt Accounting Manager