

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

SUNCADIA WATER COMPANY, LLC

Petition for an Accounting Order  
Associated with COVID-19 Public Health  
Emergency

DOCKET NO. UW-\_\_\_\_\_

PETITION

**I. INTRODUCTION**

1 Pursuant to WAC 480-07-370(3)(b) and 480-110-505, Suncadia Water Company, LLC (“Suncadia Water” or the “Company”) files this petition (“Petition”) with the Washington Utilities and Transportation Commission (the “Commission”) seeking an accounting order to allow the use of deferred accounting, from the date of this Petition forward, for costs associated with the recent COVID-19 public health emergency. As described more fully below, Suncadia Water anticipates that the emergency, overall, will result in costs to customers that the Company seeks to defer for later rate-making treatment.

**II. BACKGROUND**

2 Suncadia Water is a water company and public service company doing business in the State of Washington and is subject to the jurisdiction of the Commission regarding rates, service, and accounting practices. The Company’s principal place of business is 531 Rope Rider Drive, Cle Elum, Washington 98922.

**III. COMMUNICATIONS**

3 Communications regarding this Petition should be addressed to:

NW Natural  
e-Filing for Regulatory Affairs  
250 SW Taylor Street  
Portland, Oregon 97204  
Telephone: (503) 610-7330  
Fax: (503) 220-2579  
Email: eFiling@nwnatural.com

Natasha Siores  
Manager, Regulatory Compliance  
NW Natural  
250 SW Taylor Street  
Portland, Oregon 97204  
Telephone: (503) 610-7074  
Email: natasha.siores@nwnatural.com

4 In addition, Suncadia Water respectfully request that all data requests be addressed to:

e-Filing for Regulatory Affairs  
eFiling@nwnatural.com

#### **IV. REASONS FOR REQUEST FOR DEFERRED ACCOUNTING**

5 On February 29, 2020, Washington Governor Inslee declared a state of emergency over the  
COVID-19 pandemic. Suncadia Water has suspended all service disconnections and late  
payment fees in order to help limit the impact on customers as they navigate these difficult  
economic times. The public health emergency is expected to drive significant accounts  
receivable write-off expense. Suncadia Water also may experience other costs related to the  
emergency that the Company is currently unable to predict and that are not otherwise  
included in rates. Suncadia Water will document all costs known to be incurred by the  
COVID-19 public health emergency.

6 Due to the unpredictable and unprecedented nature of the emergency, these costs are not  
currently recovered in rates, outside normal business risk, and, accordingly, Suncadia Water  
requests to recover these expenses through deferred accounting.

#### **V. PROPOSED ACCOUNTING TREATMENT**

7 Beginning on March 27, 2020, Suncadia Water proposes to account for the expenses incurred  
as a result of COVID-19 by recording a deferral, in Account 186. In the absence of approval  
of deferred accounting, Suncadia Water would record costs associated with the COVID-19  
public health emergency to various expense accounts.

8 Suncadia Water may determine, as it works through the accounting specifics, that other  
accounts will be used also.

**VI. ESTIMATED AMOUNTS SUBJECT TO DEFERRAL**

9 Suncadia Water is unable to predict an estimate of incurred expense related to COVID-19  
while the emergency is still fluid and changing rapidly.

**VII. CONCLUSION**

10 Suncadia Water respectfully requests that the Commission issue an accounting order  
authorizing the Company to defer the costs described in this Petition.

Dated this 27<sup>th</sup> day of March 2020.

Respectfully Submitted,

SUNCADIA WATER COMPANY, LLC

/s/ Eric W. Nelsen

NW NATURAL

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