

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

OLYMPIC WATER AND SEWER, INC.

DOCKET UW-110436

PETITION FOR WAIVER OF PORTION
OF WAC 480-07-530 WORK PAPER
FILING REQUIREMENTS

1. Olympic Water and Sewer, Inc. (“OWSI” or the “Company”), hereby respectfully petitions for waiver of and an exemption to the work paper filing requirements outlined in WAC 480-07-530(4)(c) – (f) and -530(4)(h) – (i). The Company seeks imposition of a surcharge for a specific purpose and recovery of specific costs, and the work paper requirements sought to be waived are not necessary or relevant to this filing. The Company makes this request pursuant to WAC 480-80-015 and chapter 480-07 WAC.

FACTS

2. In 2009, in the course of drilling Well No. 17, the Company discovered contamination at the well site property. On March 7, 2011, the Company filed with the Washington Utilities and Transportation Commission (Commission) a petition seeking an accounting order under WAC 480-07—370(1)(b), seeking authority to defer costs associated with this well drilling and site investigation work. The Commission granted the petition in Order

No. 01. The Company's present filing focuses only on request for imposition now of a temporary surcharge for the recovery of well drilling and a share of prior site investigation costs associated therewith.

3. Related and supporting documents were previously submitted by the Company in Docket No. UW-110436 and UW-101543, which documents are already on file with the Commission herein. The Commission permitted deferral of these costs in Order No. 01, Order Granting Accounting Petition in UW-110436.

ARGUMENT: PETITION FOR WAIVER

4. While fashioned as a general rate increase filing, this filing is narrowly focused in support of a surcharge for the recovery of known and measurable past costs as authorized under Oder No. 01 in UW-110436. The work paper filing requirements of WAC 480-07-530(4) are largely inapplicable.

5. The Company has included those work papers relevant and necessary to support this surcharge filing, including a calculation of the revenue impact of proposed rates by each class affected, a balance sheet and statement of revenues and expenses relevant to the surcharge, calculations of amount to be recovered including pro-forma charges, interest, state excise tax, and recovery period, where relevant, the Company's customer roll, identifying customers by account and meter numbers, and statement of the Company's Department of Health public water system identification number.¹ Additional information, not specifically set forth in WAC 480-07-530(4), is also included in the supporting work papers in support of the costs incurred in the drilling of Well No. 17 and the associated environmental contamination investigation costs.

¹ WAC 480-07-530(4)(a), (b), and (g).

6. In addition to the above, and pursuant to Order No. 01 in Docket No. UW-110436, the Company has also filed a status report with the Commission every six months since entry of Order No. 1, which reports summarize the deferred amounts and related issues. Those status reports are already on file with the Commission herein. The surcharge requested is intended to seek recovery of those deferred amounts now.

7. Strict compliance with WAC 480-07-530(4) is not necessary to support this filing, includes information not relevant to this specific purpose, and would cause undue hardship on the Company and force the expenditure of unnecessary time and expense, expense that would be needlessly passed on to its customers in the future. Application of WAC 480-07-530(4) here would be contrary to the purposes of the rule.

8. The revenue impact is described in the tariff filing and the notice to customers.

CONCLUSION

9. Based on the foregoing, the Company has submitted all work papers relevant to this surcharge filing, and respectfully requests waiver of and an exemption to the additional work paper filing requirements outlined in WAC 480-07-530(4)(c) – (f) and -530(4)(h) – (i), as not relevant to the present filing.

DATED this 7th day of March 2014.

OLYMPIC WATER AND SEWER, INC.



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