



# ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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June 24, 2022

**SENT VIA WEB PORTAL**

Amanda Maxwell  
 Executive Director and Secretary  
 Washington Utilities and Transportation Commission  
 P. O. Box 47250  
 Olympia, WA 98504-7250

Re: *Great Basin Water Company LLC General Rate Case,*  
 Docket UW-220218

Dear Director Maxwell:

The Public Counsel Unit of the Washington State Attorney General's Office (Public Counsel) respectfully submits these comments in regard to Great Basin Water Company's (Great Basin or the Company) request to raise customer rates, effective July 1, 2022. Public Counsel appreciates the opportunity to comment on the re-filed rate proposal. We also appreciate the Company's willingness to respond to informal data requests and Washington Utilities and Transportation Commission Commission Staff's (Staff) time to answer questions.

The Company originally requested an increase to its revenue requirement by \$108,000, or a 32 percent increase in overall billed revenue, which would have been a significant one-time increase. Public Counsel understands that Staff has worked with the Company to adjust their original request. The adjustments resulted in a lower overall revenue requirement and two phase rate changes over one year. New rates would be effective on July 1, 2022, and July 1, 2023, if the new proposal is approved.

Based on the new proposal, as it was communicated by Staff, Public Counsel continues to recommend the Washington Utilities and Transportation Commission (Commission) take action to reduce the impact on customers, particularly those who are struggling to stay current on their water bills. Public Counsel may offer additional or amended comments at the June 30, 2022, Open Meeting.

***Public Counsel's Recommendation***

Spread the rate increase over a three-year period. The Commission should require the Company to address affordability and reduce arrearages.

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Public Counsel appreciates the work Staff has conducted with the Company to reduce rates significantly from the original March 28, 2022, filing. However, the rate impact on customers of the legacy Harrison Ray (Kiona) system will still face a significant rate increase over the two periods. According to communication with Staff, the average Kiona customer will pay \$15.19 or 32.5 percent more than current rates by July 2023. Customers who have budgeted for a consistent water bill for several years will experience rate shock, even under the new proposal. Public Counsel recommends spreading the increase over an additional period to reduce shock. This could be accomplished without resulting in a deferred balance by adjusting the rate changes to the other two legacy systems over the three-year period. New rates under Public Counsel's recommendation would be effective in 2022, 2023, and 2024 on July 1st of each year.

Furthermore, Public Counsel reiterates the concern about the significant number of customers experiencing arrearages on Great Basin's system. As indicated in Public Counsel's May 20, 2022, Comments, 54 percent of Great Basin's residential customers are having difficulty staying current on their bills. Any bill increase will make it harder for these customers to get caught up and potentially push more customers into arrears. The number of residential customer accounts in arrears has increased more than 101 percent since 2019. Increasing bills according to the Company's request will undoubtedly make it more difficult for customers to cover their debt and stay current and will likely push more customers into arrears. This will significantly harm customers and may cause an even larger revenue shortfall. Public Counsel again recommends that the Commission direct the Company to address affordability and reduce arrearages.

***Public Counsel's Recommendation***

The Commission should clarify the Company's Disconnection and Reconnection fee charges and ensure they are cost-based and in line with the Company's Tariff.

Public Counsel reiterates a concern detailed in our May 20, 2022, Comments. The Company requests doubling Reconnection Visit Charges from \$25 to \$50. It is Public Counsel's understanding that this requested increase is cost based and was developed on the assumption that a Reconnection Visit Charge recovers the cost of two visits to the customers' premises—the first visit to disconnect the customer and the second visit to reconnect the customer if they are unable to produce payment at the time of the first visit. This assumption and definition of "Reconnection Visit Charge" is confusing and conflicts with the Company's Service Tariff WN U-3. The Company's Tariff at Sheet No. 5 describes both a Disconnection Visit Charge and Reconnection Charge as a "single visit." Therefore, the charge should reflect the actual cost of a single visit, resulting in a \$25 charge for each.

Public Counsel is concerned that this confusion and conflict with the Company's tariff could result in customers being overcharged. For example, a customer facing disconnection for non-

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payment could be charged for a disconnection visit and a reconnection visit, which would result in \$75 worth of fees, as opposed to the cost-based \$50 total charge. Public Counsel urges clarification and correction of this issue, since it is unclear if the issues is addressed by the revised proposal.

Public Counsel appreciates the opportunity to submit these comments. Furthermore, Public Counsel understands that the Company's original filing is still subject to adjustments in collaboration with Commission Staff. We reserve the right to amend, supplement, or otherwise update our comments ahead of or during the May 26, 2022, Open Meeting. If you have any questions about this filing, please contact Nina Suetake, (206) 389-2055 or [Nina.Suetake@ATG.WA.GOV](mailto:Nina.Suetake@ATG.WA.GOV), or Corey Dahl, (206) 464-6380 or [Corey.Dahl@ATG.WA.GOV](mailto:Corey.Dahl@ATG.WA.GOV).

Sincerely,

/s/ 

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