



September 26, 2022

**VIA ELECTRONIC SUBMISSION**

Utility And Transportation Commission  
PO Box 47250  
Olympia, WA 98502

**Re: Docket UE-220066 - PSE Rate Case**

The Washington State Water Resources Association (WSWRA) appreciates the opportunity to comment on the rate increase proposed by Puget Sound Energy (PSE). WSWRA is a trade association representing Washington irrigation districts and irrigation companies, and other agricultural and municipal water providers throughout Washington. WSWRA's members deliver water to enable billions of dollars of food production annually. Water is the lifeblood of food and fiber production in Washington, and our members strive to ensure adequate water is delivered.

On behalf of our members, including Cascade Irrigation District, we wish to express our concerns related to the dramatic rate increases proposed by PSE. While we appreciate that costs have increased and new liabilities have been placed on utilities, this is not singular to electric utilities. Our members have struggled to continue to provide water at reasonable prices to their customers, the farmers who feed us and provide a significant share of Washington's economy.

We have watched costs increase across the board, and irrigation districts continue to feel these pressures while impacted by the fact they are non-profit entities constrained by the reality that their rate base (farmers) are unable to raise the prices. Farmers are price takers not setters. So as costs rise on inputs (including electricity) their profitability is compromised.

As you consider this rate case, we hope you will keep these facts in mind. Especially the dramatic jump in schedule #35 rates (which includes irrigation water). If rates must be increased, the increase should come more gradually to allow districts to adjust their budgets and farmers can seek ways to address the additional costs.

Thank you for providing this opportunity to comment on this matter. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Stuhmiller", with a long horizontal flourish extending to the right.

John Stuhmiller  
Executive Director  
Washington State Water Resources Association