

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

Submetering Rulemaking

Docket No. UW-991634

DATED JUNE 14, 2000

**COMMENTS TO PROPOSED RULES OF NATIONAL WATER & POWER INC.,  
THE NATIONAL SUBMETERING AND UTILITY ALLOCATION  
ASSOCIATION, AND VITERRA ENERGY SERVICES INCORPORATED.**

Pursuant to the Washington Utilities and Transportation Commission's (the "Commission") Notice of Opportunity to Comment dated May 12, 2000, National Water & Power Inc., the National Submetering and Utility Allocation Association ("NSUAA") and Viterra Energy Services Incorporated, hereinafter collectively referred to as the "Commenting Parties", submit this comment in the above-referenced matter. Pursuant to the Commission's Notice of Opportunity to Comment, comments were set to be filed on or before June 14, 2000. Thus, this comment is timely filed.

The Commenting Parties are uniquely qualified to provide the Commission with input relating to submetering. NSUAA members include billing companies, manufacturers of submetering equipment and software, and property owners. Nationwide, NSUAA members work in at least three dozen states. Some of NSUAA's members are international firms, with utility billing operations in over two dozen countries. In addition, NSUAA members have been in the business for over 20 years and have been instrumental in bringing about the significant conservation benefits of submetered and allocation billing systems.

The Commenting Parties support the Commission's interpretation of Chapter 480-110 WAS as it relates to property owners that use submetering or allocation services to fairly distribute water costs to their occupants. The Commission is properly adhering to a literal and plain meaning reading of the applicable statute.

Moreover, the Commission is using good judgement in not attempting to regulate the submetering and allocation industry. Any form of regulation is currently unnecessary and

could serve to discourage submetering and allocation, thereby limiting the conservation benefits that such practices produce. It is important to encourage such practices in order to reap the benefits of submetering and allocation. A recent study compiled by the National Apartment Association concluded that properties that submeter use between 18-39 percent less water than properties that do not submeter.

In addition, submetering and/or allocation also benefits the wastewater treatment side of this process. When a person draws less water from the tap, less water is necessarily sent down the drain. Thus, for every gallon of water that is saved as a result of water conservation, approximately one less gallon of wastewater is created. This often means that the local sewage treatment plant has less stress on it, and the plant's operating costs may be lower. More importantly, the treatment plant will not need to expand as often, which may result in significant taxpayer savings.

Thus, the Commenting Parties fully support the Commission's interpretation of the relevant laws. The proposed rule is well written, but the Commenting Parties believe that the term "tenant" should be replaced with a more encompassing term such as "occupant". It is often the case that submetering or allocation practices are done in condominiums or mobile home parks, where the end users are owners, not tenants. Thus, the Commenting Parties suggest that the term "tenants" is replaced with "occupants" in the first sentence of the proposed rule.

Thank you for the opportunity to comment on the proposed rules.

Respectfully submitted this June 14, 2000.

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