

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

SARAH HAND,

Complainant,

v.

RAINIER VIEW WATER COMPANY,
INC.,

Respondent.

DOCKET UW-170924

ORDER 03

FINAL ORDER DENYING IN PART
AND GRANTING IN PART
PETITION FOR ADMINISTRATIVE
REVIEW OF INITIAL ORDER

BACKGROUND

- 1 On November 8, 2016, Sarah Hand filed at the Washington Utilities and Transportation Commission (Commission) an informal complaint raising issues about the quality of the water she receives from Rainier View Water Company, Inc. (Rainier View or Company). The Commission served its Notice Converting Informal Complaint to Formal Complaint on August 31, 2017.
- 2 The Commission conducted a prehearing conference on December 18, 2017, and entered Order 01, Prehearing Conference Order, on December 20, 2017 (Order 01).
- 3 As agreed by the parties, Ms. Hand filed a revised complaint (Complaint) with the Commission on January 8, 2018, identifying the issues as to which she sought a Commission determination. Ms. Hand's Complaint states that Rainier View:
 - Delivers water that is "impure" as a matter of law and unfit for normal residential use;
 - Misrepresents the quality of its water to the public;
 - Failed to report excess manganese levels in its water to the DOH in violation of WAC 246-290-320(i)(c) and failed to conduct water testing as frequently as DOH required;

- Misdirects the public on where and how to submit water quality complaints and fails to process complaints and maintain complaint records, in violation of WAC 480-110-385; and
- Passed on the costs of its new filtration system to the public without obtaining public input or approval, in violation of WAC 246-20-320(3)(d) and the DOH Water System Design Manual.

The complaint sought the following relief:

- Monetary damages, including reimbursement of Ms. Hand's expenses, decreased property value, and refunds of amounts she has paid the Company for water service;
- An order requiring Rainier View to improve the quality and purity of its water so that it meets state safe drinking water standards within 30 days; and
- An order requiring the Company to improve its customer service and to change specified unjust or unreasonable acts and practices.

4 On January 29, 2018, the Company filed its Answer and Affirmative Defenses, denying the claims in the Complaint and arguing that Ms. Hand is not entitled to any of the remedies that she requests.

5 The parties filed testimony and exhibits. The Commission conducted an evidentiary hearing on July 25, 2018, before Administrative Law Judge (ALJ) Greg Kopta. Staff, Rainier View, and Ms. Hand filed post-hearing briefs on August 27, August 28, and August 29, 2018, respectively.

6 On October 2, 2018, the presiding ALJ entered Order 02, Initial Order (Initial Order).¹ The Initial Order found that "Rainier View has supplied and continues to supply Ms. Hand with water that is impure within the meaning of RCW 80.28.030(1) and fails to meet DOH drinking water quality standards."² The Initial Order thus directs Rainier View to "ensure that the water it supplies to [Ms. Hand's] home consistently meets or

¹ Docket UW-170924, *Hand v. Rainier View Water Co., Inc.*, Order 02, Initial Order (Oct. 2, 2018) (hereinafter Initial Order).

² Initial Order at ¶ 27.

exceeds DOH drinking water quality standards within 60 days from the effective date of this order.”³ The Initial Order directed Rainier View, in consultation with Staff and DOH, to test the water entering Ms. Hand’s home no less than bi-weekly, and to continue these tests and remediation efforts until the results are consistently comparable to the results from the tests at the filtration point that the Company had provided to the Commission—*i.e.*, to ensure that the quality of the water is not impaired by contaminants within Rainier View’s water distribution system.⁴

7 The Initial Order required the Company to inspect the pipes in Ms. Hand’s home and to remove “any manganese” from the pipes once the test results of the water supplied to her home show that the water meets DOH standards.⁵ Rainier View is responsible for the costs that it incurs to comply with the requirements of the Initial Order,⁶ and was directed to reimburse Ms. Hand for the costs that she incurred to test the water in her home in the amount of \$2,275.⁷ Finally, the Commission on its own initiative waived WAC 480-110-395, on a prospective basis, and prohibited Rainier View from charging or collecting any moneys from Ms. Hand until the Company fully complies with the Initial Order.⁸

8 On October 22, 2018, the Company filed its Petition for Administrative Review.⁹ Rainier View challenges the finding that it had supplied and continued to supply Ms. Hand with impure water. Rainier View also challenged three of the remedies directed in the order: (1) that the Company ensure that the water it supplies to Ms. Hand’s home consistently meets or exceeds DOH drinking water quality standards; (2) that the Company inspect the pipes in Ms. Hand’s home and remove any manganese; and (3) that the Company desist from charging Ms. Hand until it complies with the Initial Order.

9 In her November 1, 2018, response to the Petition, Ms. Hand supported the Initial Order’s remedies and the administrative law judge’s finding that the water Rainier View supplies

³ *Id.* at ¶¶ 29, 63.

⁴ *Id.* at ¶ 64. Because Rainier View’s processing of complaints is not a subject of its Petition for Administrative Review, the Initial Order’s findings and rulings on that issue are not discussed herein.

⁵ *Id.* at ¶ 65.

⁶ *Id.* at ¶ 66.

⁷ *Id.* at ¶ 67.

⁸ *Id.* at ¶ 68.

⁹ Docket UW-170924, *Hand v. Rainier View Water Co., Inc.*, Respondent’s Petition for Administrative Review (Oct. 22, 2018) (hereinafter Petition).

to her is impure. Staff's November 1, 2018, response to the Petition likewise asked the Commission to affirm the Initial Order's findings and remedies.

Factual Background

- 10 Excess manganese in groundwater is a longstanding issue in Rainier View's service area. In approving a 1998 surcharge for Rainier View, the Commission noted, based on the Company's statements, that "iron and manganese, in most cases, is the biggest nuisance encountered with the ground water in this area."¹⁰ In 2014, the Commission approved a surcharge for Rainier View to service a \$685,884 capital improvement loan;¹¹ the Company requested the surcharge "for the construction of six water treatment plants to reduce manganese and iron content, a source of frequent customer complaints."¹² The Commission approved the extension of that surcharge in 2016, once again citing high manganese content as the impetus.¹³
- 11 Ms. Hand's home, in Spanaway, Washington, was built in 1997.¹⁴ Ms. Hand and her family bought and moved into the home on May 27, 2015.¹⁵
- 12 Ms. Hand asserts that, since the time she moved into her home, the water that runs through her faucets is regularly light to dark brown in color, has floating sediment, and has an unpleasant odor.¹⁶ Ms. Hand would temporarily remedy these problems by draining her hot water heater and running her faucets.¹⁷ Ms. Hand then learned at a

¹⁰ *In re Rainier View Water Co. for an Order Granting Tariff Revision*, Docket UW-981128, Order Granting Tariff Revision (Sept. 23, 1998) (hereinafter 1998 Surcharge Order).

¹¹ *Washington Utilities Transportation Commission v. Rainier View Water Co.*, Docket UW-141365, Order Approving Surcharge Tariff at ¶ 1 (Jul. 24, 2014) (hereinafter 2014 Surcharge Order).

¹² *Id.* at ¶ 2.

¹³ *Washington Utilities Transportation Commission v. Rainier View Water Co.*, Docket UW-161232, Order Approving Surcharge Extension Tariff at ¶ 2 (Dec. 22, 2016) (hereinafter 2016 Surcharge Order).

¹⁴ Hand, TR 178:13-15.

¹⁵ Exh. BB-3. Ms. Hand's home is located in a community of 179 homes called "Springwood Estates." Hand, Exh. SH-1T at 2:7-8.

¹⁶ Docket UW-170924, *Hand v. Rainier View Water Co., Inc.*, Brief of Complainant Sarah Hand at 1-2 (Aug. 28, 2018).

¹⁷ Hand, TR 182:20-24, 217:16-218:15.

homeowners' association meeting that manganese-contaminated water was the likely source of her brown water issues.¹⁸

- 13 Rainier Water experienced an increase in work order requests due to brown or black water in the early part of 2016.¹⁹ Rainier View identified the source of the brown water as excess manganese in a wellhead known as Fir Meadows 3, a well that serves Ms. Hand's water system.²⁰ Ms. Hand's subdivision of Springwood is closest to the Fir Meadows wells.²¹ The manganese content in Fir Meadows 3 exceeded the DOH's Secondary Maximum Contaminant Level (SMCL) of 0.05mg/L.²²
- 14 Ms. Hand replaced a pressure release valve in her home on November 3, 2016, and contacted Rainier View regarding excess manganese deposits in her water on November 9, 2016.²³
- 15 The surcharge extension that the Commission approved for Rainier View in 2016 was used in part to fund a filtration system for manganese at Fir Meadows that was put online in June 2017.²⁴ According to tests submitted by Rainier View, manganese levels at Fir Meadows 4 prior to installation of the filtration system were double or nearly triple the SMCL.²⁵
- 16 Manganese build up may remain in a water distribution system even after a well is treated.²⁶
- 17 Ms. Hand's home is located at the end of a water line.²⁷ According to Rainier View's General Manager Bob Blackman, manganese contamination tends to have the greatest

¹⁸ Hand, TR 183:7-11.

¹⁹ Blackman, Exh. BB-1T at 7:5-6.

²⁰ *See id.* at 7:6-9.

²¹ Exh. SH-14 at 9.

²² Blackman, Exh. BB-1T at 7:10-15. *See* WAC 246-290-310.

²³ Exh. BB-3.

²⁴ Blackman, BB-1T at 13:9-15:3.

²⁵ Exh. BB-4.

²⁶ Blackman, TR at 134:4-135:3.

²⁷ Hand, Exh. SH-15 at 14; *see* Blackman, TR at 117:4-6.

impact on homes located at ends of water lines, as the sediment has a tendency to settle out at the ends of lines.²⁸

DISCUSSION AND DECISION

18 We deny Rainier View’s Petition for the most part. The Initial Order’s findings and remedies are appropriate and supported by the facts and the law, and we adopt the Initial Order as our own, with one exception. We grant Rainier View’s Petition to the extent of rejecting the requirement in the Initial Order requiring the Company to remove any manganese sediment from inside the pipes in Ms. Hand’s home.

19 Rainier View’s Petition challenges 11 findings and remedies in the Initial Order, in the following four categories:

- That Rainier View has supplied Ms. Hand with impure water that fails to meet DOH drinking water standards;
- That Rainier View must ensure that the water that it supplies to Ms. Hand’s home consistently meets or exceeds DOH drinking water quality standards;
- That Rainier View must inspect the pipes in Ms. Hand’s home and remove “any manganese” from the pipes in her home;
- The prospective water quality refund that is effective until Rainier View supplies Ms. Hand with pure water.

20 We address each of Rainier View’s claims, in turn, following a brief overview of the statutes, regulations, and other authority relevant to this proceeding.

Relevant Authority

21 WAC 480-07-825(2) provides: “A party may challenge any finding of fact, conclusion of law, remedy, or result in an initial order by petitioning for administrative review.” The Commission’s rules do not set forth a standard for administrative review.

²⁸ Exh. RS-2 at 13 (email from Mr. Blackman, “the customer that filed this complaint lives on a dead end line, which could experience discoloration more frequently”).

22 There is no question that the Commission has statutory authority to examine water quality. Under RCW 80.04.110(5), any customer of a regulated water company may file a complaint with the Commission if he or she has reason to believe that the water delivered by the system to the customer does not meet state drinking water standards. Under RCW 80.28.030(1), if the Commission finds, after a hearing, that the

purity, quality, volume, and pressure of water, supplied by any . . . water company . . . is insufficient, impure, inadequate or inefficient, it shall order such improvement in the . . . storage, distribution or supply of water, or in the methods employed by such . . . water company, as will in its judgment be efficient, adequate, just and reasonable.

23 This provision also sets forth the burden of proof in such proceedings: “[f]ailure of a water company to comply with state board of health standards . . . or department standards . . . for purity, volume, and pressure is prima facie evidence that the water supplied is insufficient, impure, inadequate, or inefficient.”²⁹

24 The DOH Office of Drinking Water (ODW) regulations governing the purity of drinking water set the SMCL for manganese at 0.05 mg/L.³⁰

25 RCW 80.04.110(5) also provides a remedy if the Commission determines that the water subject to a complaint does not meet state drinking water standards, allowing the Commission to order a refund to the customer for the substandard water delivered to the customer, and requiring that the Commission order reimbursement to the customer for the cost incurred by the customer in obtaining a water quality test.

26 The Commission’s regulations include a rule governing the issuance of water quality refunds. Under WAC 480-110-395, the Commission may require a water company to refund water charges due to poor water quality only upon a Commission order resulting from a formal proceeding in which there is a finding of a violation of a DOH water quality standard, including SMCLs, and the company does not take follow-up steps directed by the DOH under WAC 246-290-320.

²⁹ RCW 80.28.030(1).

³⁰ WAC 246-290-310.

27 Under a 2008 Memorandum of Understanding with the DOH, Staff consults with the
ODW when assessing formal complaints regarding the purity, quality, volume and
pressure of water.³¹

1. Impure Water Findings

28 We affirm the ALJ's finding under RCW 80.28.030 that Rainier View has supplied and
continues to supply impure water to Ms. Hand, as well as the finding under RCW
80.04.110 that Rainier View has failed to meet DOH drinking water standards.

29 These findings are supported by substantial evidence, as follows:³²

- Ms. Hand's testimony that the water she has received since she moved into her home is brown, has an unpleasant odor, should not be consumed, and is only marginally useful for bathing and washing.³³
- Results of an April 2017 laboratory test submitted by Ms. Hand showing that in one part of her house, the level of manganese exceeds DOH water quality standards.³⁴
- Rainier View's acknowledgment in its testimony that prior to installation of a filtration system in June 2017, the manganese level was higher than legal limits in the water coming from one of its wells used to supply water to Ms. Hand's neighborhood.³⁵
- Rainier View's acknowledgment that manganese continues to be present in the Company's distribution system and may not be cleared out for two to three years following installation of the well filtration system.³⁶

³¹ Exh. BRR-1 at 11.

³² Initial Order at ¶ 23.

³³ Hand, Exh. SH-1T at 3-6; Hand, TR 217:16-219:7.

³⁴ Exh. SH-29 at 18-19.

³⁵ Blackman, Exh. BB-1T at 12-16.

³⁶ Blackman, TR 134:15 – 135:3 & 144:11-19; Blackman, Exh. BB-1T at 15:12-14 (“Since the filtration system has gone online, only minimal amounts of manganese is entering the water systems. However, manganese still exists in the water system pipes past the point of filtration”).

30 Rainier View takes issue with the reliability of Ms. Hand’s testimony and the results of the water quality test that she submitted.

31 Regarding the reliability of Ms. Hand’s testimony, the ALJ found that Ms. Hand testified credibly about experiencing brown running water in her home. As noted in Staff’s Answer to the Petition, the Commission gives “substantial weight” to an ALJ’s credibility findings.³⁷ Ms. Hand’s statements about her water are also consistent with the statements of Rainier View’s General Manager Bob Blackman.³⁸ While Rainier View claims that “[n]o rational or scientific explanation exists why Ms. Hand’s home—and only her home—experienced brown water as severe and often as she claims,”³⁹ Rainier View had explained to Staff that “the customer that filed this complaint lives on a dead end line, which could experience discoloration more frequently.”⁴⁰ Rainier View has also “investigated the water quality in the wells closest to Springwood Estates, the development where Ms. Hand lives, and determined that manganese levels had been rising over the past several years.”⁴¹ And while Ms. Hand has testified that installation of the Fir Meadows filtration system had not completely cleared up the brown running water in her home,⁴² her testimony is consistent with Rainier View’s testimony that manganese buildup in its water system will continue to work its way out of the system over the next few years.⁴³

32 Regarding the results of April 2017 water quality test results received into the record, the ALJ gave it proper weight in making the impure water finding, examining it alongside the other cited evidence. In addition, Rainier View did not provide any alternative test data on manganese content in its distribution system.

³⁷ Docket UW-170924, *Hand v. Rainier View Water Co., Inc.*, Staff’s Answer to Rainier View Water Company’s Petition for Administrative Review at 6 (Nov. 1, 2018) (citing *Washington Utilities Transportation Commission v. Best Moving & Delivery, LLC*, Docket TV-132030, Order 03, at 3 ¶ 11 (May 8, 2015)).

³⁸ See, e.g., Blackman, TR 102:14-18 (“All of Sarah Hand’s complaints are actually consistent with what your expert, Apex, told you would happen with excessive levels of manganese in the water, right? Right.”).

³⁹ Petition at ¶ 4.

⁴⁰ Exh. RS-2 at 13.

⁴¹ Stark, RS-1T at 4:20-22.

⁴² Hand, TR 193:4-22, 217:16-219:7.

⁴³ Blackman, TR 134:21-135:3, 144:11-19.

2. Water Quality Assurance Requirement

- 33 The Initial Order directs Rainier View to ensure that the water it supplies to Ms. Hand’s home consistently meets or exceeds DOH drinking water quality standards within 60 days from the effective date of the Initial Order. Contrary to Rainier View’s representation, this does not require that Rainier View remove all manganese from its distribution system.⁴⁴ The Initial Order requires that water entering Ms. Hand’s home—which has passed through Rainier View’s distribution system up to Ms. Hand’s meter—must have a manganese content that does not exceed the SMCL set forth in WAC 246-290-310.
- 34 Contrary to Rainier View’s arguments,⁴⁵ this remedy provided in the Initial Order does not impose standards beyond those contained in the law or detract from Rainier View’s tariff protections. While the Commission primarily is an economic regulator, it is also charged with ensuring the quality of the commodities that it regulates. Even if the Commission’s role were strictly limited to economic regulation, economic regulation requires ensuring that ratepayers’ service benefits from surcharges that the Commission allows. The Commission has repeatedly allowed Rainier View to collect surcharges in the past 20 years in order to treat, at least in part, manganese contamination.⁴⁶ The Commission cannot approve all of Rainier View’s requested manganese-contamination treatment costs for decades without expecting and ensuring appropriate results are achieved from the surcharges allowed. To do so would be imprudent and a failure of economic regulation.⁴⁷
- 35 Nor would it be wise to disallow cost recovery for treatments and systems that are necessary to address an issue that, according to both the Company and its ratepayers, needs to be addressed. As noted by the Environmental Protection Agency, secondary contaminants like manganese may cause water to “appear cloudy or colored, or to taste or

⁴⁴ Cf. Petition at ¶ 16.

⁴⁵ Petition at ¶ 19.

⁴⁶ See 1998 Surcharge Order; 2014 Surcharge Order; 2016 Surcharge Order.

⁴⁷ As noted in Mr. Blackman’s testimony, financial regulation is intrinsically tied to product quality. See Blackman, Exh. BB-1T 4:5-8 (“The Commission focuses largely on matters involving customer service, billing and rates, and financial records and reporting, although **this necessarily also involves some aspects of water quality**” (emphasis added)).

smell bad.”⁴⁸ Accumulation of the mineral in Rainier View’s distribution system that results in delivered water being in excess of the DOH’s SMCL must be addressed by Rainier View.⁴⁹

36 Finally, Ms. Hand has noted that the quality of water improved when Rainier View increased its line flushing.⁵⁰ Whether by line flushing or pigging,⁵¹ Rainier View has the means to clear its water distribution system of excess manganese.

3. Household Pipe Manganese Removal Requirement

37 The Initial Order directs Rainier View to inspect the water pipes in Ms. Hand’s home and “remove any manganese” once the results of the tests of the water coming into her home show that water entering her home complies with DOH drinking water standards. We reject this remedy, for three reasons.

38 First, the Initial Order does not state why this requirement is necessary, or cite record support demonstrating damage caused to the pipes in Ms. Hand’s home by excess manganese levels. While Ms. Hand states that a pressure release valve in her home was replaced in November 2016, nothing in the record establishes that this replacement was made necessary by anything other than routine maintenance in a 20-year-old home.

39 Second, as a practical matter, it is not clear that a water distribution utility would have the necessary experience or equipment to address household plumbing issues.

40 Third, the Initial Order’s direction to remove “any manganese” from household pipes also suggests that the water that flows through those pipes would need to be entirely free of the mineral, which is not necessary to meet DOH drinking water standards. While there may be a manganese build-up in Ms. Hand’s home that resulted from Rainier

⁴⁸ Environmental Protection Agency, “Secondary Drinking Water Standards: Guidance for Nuisance Chemicals,” <https://www.epa.gov/dwstandardsregulations/secondary-drinking-water-standards-guidance-nuisance-chemicals> (last visited Dec. 12, 2018).

⁴⁹ Mr. Blackman of Rainier View demonstrated his understanding of the Commission’s role in ensuring water quality on the record. Blackman, TR 94:6-11 (“Do you understand why stringent regulation of Rainier View Water is necessary? Yes, I do. Why is it necessary? Lack of competition, they want to assure the consumer to have a reliable product”).

⁵⁰ Hand, SH-1T at 3:11-12.

⁵¹ Mr. Blackman presented pigging as a possible solution for removing manganese sediment in the Springwood water system at the December 22, 2016 Commission open meeting. Exh. SH-14 at 17.

View's delivery of impure water, the Commission's jurisdiction under RCW 80.28.030 is limited to the storage, distribution, or supply of water by a water company. As Rainier View argues, imposing requirements on a utility outside of its system contradicts longstanding doctrine limiting utilities' liability for consequential damages.

4. Prospective Water Quality Refund

41 We uphold the Initial Order's remedy requiring a prospective water quality refund. This remedy is permitted by statute and the Commission's rules.⁵² It is appropriate when the Commission finds that a company supplied impure water to a customer for several years and where the customer's only recourse during that time was to flush additional water through her home, incurring the cost of the additional water usage.

42 Rainier View's assertion that this remedy violates due process is unpersuasive. Rainier View was on notice that the Commission's refund rule was at issue in the proceeding because the Complaint requested water quality refunds under WAC 480-110-395.⁵³ While WAC 480-110-395 requires that the Company fail to take follow-up steps directed by the DOH, the Initial Order waived that requirement of the rule, as allowed under WAC 480-07-110. The waiver applies only to prospective refunds, as of the date of the Initial Order; thus, Rainier View had the opportunity to contest the refund request.

43 Finally, Rainier View was prepared to offer a partial prospective refund on its own prior to the date of the Initial Order, conveying to Staff that it had suggested to Ms. Hand installing an electronic meter that would help the Company determine the amount of water used to flush Ms. Hand's lines and credit her account by that amount.⁵⁴ Rainier View's due process argument lacks credibility in light of its previous suggestion to the complainant.

FINDINGS AND CONCLUSIONS

44 (1) The Commission adopts Findings and Conclusions (1)-(11) and (13)-(21) of the Initial Order.

⁵² RCW 80.04.220, .230; WAC 480-110-395.

⁵³ Complaint at ¶ 5.1.

⁵⁴ Exh. RS-2 at 13 (email from Mr. Blackman, "Last week I spoke with [Ms. Hand] and suggested that we would install an electronic meter which would help us determine the amount of water used to flush their lines and credit their account by that amount").

- 45 (2) The Initial Order does not violate Rainier View's due process rights.
- 46 (3) The Company is not responsible for manganese removal beyond the meter in Ms. Hand's home.

ORDER

THE COMMISSION ORDERS:

- 47 (1) The Commission denies Rainier View Water Company, Inc.'s Petition for Administrative Review except to the extent it challenges paragraphs 30 and 53 and ordering paragraph 3 of the Initial Order. The Commission does not require Rainier View to work with Sarah Hand, Commission Staff, and the Washington Department of Health to inspect the pipes in Sarah Hand's home and remove any manganese once the results of the tests of the water the Company supplies to her show that the Company is in compliance with this order.
- 48 (2) Rainier View Water Company, Inc. must take all reasonable steps necessary to ensure that the water it supplies to Ms. Hand consistently meets or exceeds Washington Department of Health drinking water quality standards within 60 days from the effective date of the Initial Order.
- 49 (3) Rainier View Water Company, Inc., in consultation with Commission Staff and the Washington Department of Health, must test the water entering Sarah Hand's home no less than bi-weekly and continue those tests and remediation efforts until the results are consistently comparable to the results from the tests at the filtration point that the Company has provided to the Commission.
- 50 (4) Rainier View Water Company, Inc., is responsible for all testing, inspection, and remediation costs it incurs to comply with the requirements in this order.
- 51 (5) Within 10 days from the effective date of the Initial Order, Rainier View Water Company, Inc., must reimburse Sarah Hand for the costs she incurred to test the water in her home in the amount of \$2,275.
- 52 (6) The Commission on its own initiative waives WAC 480-110-395 and prohibits Rainier View Water Company, Inc., from charging or collecting any moneys from Sarah Hand for the water it supplies to her from the date of the Initial Order until the Company has fully complied with the terms of this order.

- 53 (7) Rainier View Water Company, Inc., must work with Commission Staff to inform customers that they should submit to the Washington Department of Health all complaints about the quality of the water the Company supplies.

DATED at Olympia, Washington, and effective December 18, 2018.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chairman

ANN E. RENDAHL, Commissioner

JAY M. BALASBAS, Commissioner

NOTICE TO PARTIES: This is a Commission final order. In addition to judicial review, administrative relief may be available through a petition for reconsideration, filed within 10 days of the service of this order pursuant to RCW 34.05.470 and WAC 480-07-850, or a petition for rehearing pursuant to RCW 81.04.200 and WAC 480-07-870.