

The Newaukum Water System is opposed to the proposed rule putting non-profit water-user managed water systems under UTC jurisdiction. The Newaukum Water System is a not for profit corporation formed to operate and maintain the water system in the water right area of a residential subdivision for the benefit of the water users within the subdivision, the entirety of which includes 23 water users. Every water users/property owner in the subdivision is a voting member of the board of directors, electing officers, setting rates and managing the system. The Newaukum Water System Inc. owns the Newaukum Water System. Nobody has a financial interest in the Newaukum Water System, Inc. It is an organization of the users for the users.

We see no benefit to the UTC interfering with how we want to manage our system. The only function of the UTC is to delay the implementation and funding for emergency repairs, costs of which have to be paid out of rates and assessments. What function does the UTC serve over the desires and needs of our community other than to say no? AND how can they say no to funding a repair? The costs have to be paid and they can only be paid by the users. A recent emergency line blockage cost over \$3000 to repair and we paid the cost on a corporate credit card and then assessed the users \$35 for three months to pay the cost. In that case what is the UTC going to tell us? NO?? The repair had to be made in order to have water, and the cost had to be paid. Why do we need the UTC to eventually decide to say yes when the repair had to be made immediately and it had to be paid for? Putting non-profit water associations under UTC jurisdiction for reporting makes no sense and serves no benefit or purpose to the users who as a group want to do this.

We are currently fighting a legal challenge by a surrounding property owner over access rights to the community well. The property owner has said that he will cut off our access on January 1st 2014. He hired an attorney to serve notice on us. We have had to do title company research and hire an attorney and with letters going back and forth the attorney fee is now \$3500. If we do not defend our rights then we can not operate and maintain the well for the water users. It looks like we will have to file for an injunction in order to continue to operate. These legal fees are going to have to be paid. If we do not fight this now, then we can not provide water. Is the UTC going to tell us no? No we can not assess ourselves to pay the cost to defend our rights to continue to get water? Is the UTC going to tell us no, we must shut down? Putting non-profit water associations under UTC jurisdiction for reporting makes no sense and serves no benefit or purpose to the users who as a group want to do this.

We as a group some time ago decided to work toward establishing an automatic switch and generator so that when the power goes out the well has power and will continue to operate in times of commercial power outages. Right now when the power goes out we manually start and fuel a generator and then assess the water users a surcharge to cover the cost of the generator operation. Is the UTC going to tell us we can not fund this type of operation? What benefit would the UTC's involvement be to us, the 23 water users? What benefit would the UTC be to the people of the state by telling us no, or what benefit to the people of the state to even being involved telling a group of 23 people they can not do what they voted as a community to do?

In the operation of small systems we do not have the luxury of putting costs of operation onto thousands of users. When major issues come up they have to be dealt with quickly. Small systems do not have big contingency slush funds. The UTC only offers delays in saying yes or delays in saying no to 23 water users that the UTC will not approve what the 23 water users want to do. Any no or disapproval that the UTC would give would go against the non-profit organization of 23 member board of directors, because any no response means that we as the effected water users can not fund the operation of the system and we will have to shut down.

We strongly object to the proposed rule change that would put small non-profit water associations--community managed water systems into the UTCs funding and tariff jurisdiction.