

August 13, 2001

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Docket No. U-991301 - Revisions to Chapter 480-80 WAC

Dear Ms. Washburn:

This letter is filed on behalf of Rainier View Water Company, Inc. In reviewing the Commission's proposed rules, Rainier View suggests that a change be made to draft 480-80-3X3. This is a rule covering special contract for electric, water and natural gas companies. Subsection (6) of this draft rule states that "all contracts must be for a stated time period."

However, the Commission requires water companies to file developer line extension contracts. These are different than service contracts in that ongoing service is not provided under the terms of this contract. Instead, the contract establishes the conditions under which a developer brings a particular plat, subdivision or short plat onto the water company's service. Because these are construction projects, a stated period of time is not possible.

Therefore, Rainier View suggests that subsection (6) be rewritten to read as follows:

- (6) All contracts must be for a stated time period, except for contracts for water line extensions. The commission may approve terms and conditions that proscribe the charge(s) to

be applied during the time period, if such charge(s) are found to be appropriate. Unless otherwise provided by the commission, such approval will not be determinative with respect to the expenses and revenues of the utility for subsequent ratemaking considerations.

Thank you for your consideration of this request.

Sincerely,

RICHARD A. FINNIGAN

RAF/ej

cc: Bob Blackman
Fred Ottavelli