LAW OFFICES

ηf

RAINIER LEGAL CENTER, INC. P.S.

31615 MAPLE VALLEY HIGHWAY POST OFFICE BOX 100

BLACK DIAMOND, WASHINGTON 98010

(360) 886-2868 (425) 432-3380

FAX (360) 886-2124

BARRY C. KOMBOL
Attorney at Law
tainierlegal@yahoo.com

March 26, 2014

Via Facsimile: 360-586-1150

The Washington Utilities and Transportation Commission 1300 South Evergreen Park Dr SW Olympia, WA. 98504

Attn: Clerk

Re: In Re the Complaint of Mike and Glenda Beck Against Cristalina Water Company Case Nos. 117759 and 132268 "Complainants' Witness List and Exhibit List"

Dear Clerk:

Enclosed herein please find Mike and Glenda Beck's "Complainants' Witness List and Exhibit List."

Please file today this Complainants' Witness List and Exhibit List on behalf of Mike and Glenda Beck which is due by March 28th.

Should you have any questions, please do not hesitate to call. Thank you for your assistance in this matter. I remain,

Barry C. Kombol

Rainier Legal Center, Inc. P.S.

BCK:sjb
Attachment (Complainants' Witness List and Exhibit List)
cc: Mike and Glenda Beck (Enclosure)

1 2 3 - 5 6 BEFORE THE WASHINGTON UTILITIES 7 AND TRANSPORTATION COMMISSION 8 In Re the Complaint of: No. **117759** and 9 10 MIKE and GLENDA BECK, No. 132268 11 against COMPLAINANTS' WITNESS LIST AND EXHIBIT LIST 12 CRISTALINA WATER COMPANY. 13 Regulated Utility. 14 To: The Washington Utilities 15 and Transportation Commission 1300 South Evergreen Fark Dr. SW 16 Olympia, WA. 98504 Via Facsimile 360.586.1150 Via Email: atorem@utc.wa.gov Via Email: rpearson@utc.wa.gov 18 Cristalina Water Company, LLC And to: 19 Post Office Box 4055 Bellingham, WA. 98227 20 Via Email: maria@bellinghamhomes.net 21 And to: Eric P. Gillett, Esq. Attorney at Law 22 901 Fifth Avenue, Suite 3400 Seattle, WA. 98164 23 Via Email: egillet@pregodonnell.com 24 YOU, EACH OF YOU, are advised that the undersigned hereby 25 gives notice that pursuant to Washington State Administrative 26 Rules relating to proceedings of this sort and on behalf of the 27 Complainants, he discloses names, addresses and nature of 28

COMPLAINANTS' WITNESS LIST AND EXHIBIT LIST - Page 1 BARRY C. KOMBOL #8145 RAINIER LEGAL CENTER, INC. P.O. BOX 100 BLACK DIAMOND, WA 98010 (425) 452-3880 PAX (360) 886-2124

٠ 3

. 4

· 5

7

8

10

11

13

14 15

16

17

19 20

21 22

23

24 25

26

27

28

expected testimony of Complainants' MIKE and GLENDA BECK's
Witnesses.

Lay Witnesses

 Glenda Beck, Complainant 27107-314th Avenue S.E. Ravensdaie, WA. 98051 (253) 335-0293

complainant Glenda Beck may testify regarding facts relating to the tailure of the regulated utility to furnish her with proper, adequate or statutory notice prior to the disconnection of water service to their residence in November of 2013.

Mrs. Beck may further testify that she has maintained her household's water utility account with Respondent totally current since 2010. Mrs. Beck may also testify that the regulatory utility lost or failed to negotiate some of her utility payment checks; that there have been billing and crediting errors in their account with Cristalina and its predecessors for several decades.

Mrs. Beck may testify about the failures of Cristalina Water System and its predecessors, dating back for more than thirty years for failure to furnish her household with sufficient qualities and quantities of potable water for extended weeks on end.

Mrs. Beck may testify about the need she has for potable water for herself as regards her medical difficulties as well as for the sanitary needs of members of her household.

2. Mike Beck, Complainant 27107-314th Avenue S.E. Ravensdale, WA. 98051 (253) 335-0293

. 5

Complainant Mike Beck may testify regarding facts relating to the failure of the regulated utility to furnish him with proper, adequate or statutory notice prior to the disconnection of water service to their residence in November of 2013.

Michael Beck may further testify that he has maintained his household's water utility account with Respondent totally current since 2010. Mr. Beck may also testify that the regulatory utility lost or failed to negotiate some of his utility payment checks; that there have been billing and crediting errors in their account with Cristalina and its predecessors for several decades.

Michael Beck may testify about the failures of Cristalina Water System and its predecessors, dating back for more than thirty years for failure to furnish his household with sufficient qualities and quantities of potable water for extended weeks on end.

Mr. Beck may testify about the need his family has for potable water for the medical and sanitary needs of his household.

Expert Witnesses: None.

FURTHER, EACH OF YOU, are advised that the undersigned hereby gives notice that the Complainants will submit at Evidentiary Hearing in this matter the following Exhibits and Documents:

Copies of Checks from 1/1/2012 to 12/5/2013 for current water service payments

Exhibit B:

Cristalina, LLC's First Notice of Disconnection

BARRY C. KOMBOL #8145
RAINIER LEGAL CENTER, INC.
P.O. BOX 100
BLACK DIAMOND, WA 98010
(428) 432-3380 FAX (360) 886-2124

Complaintants reserve the right to amend or supplement 1 2 this Primary Witness and Exhibit List. 3 DATED this 26th day of March//201 . 4 Washington. . 5 6 ARRY C. KOMBOL, WEBA #8145 Attorney for Complainants 7 MIKE and GLENDA BECK 8 CERTIFICATE OF SERVICE I, Susan Burnett, declare under penalty of perjury under the laws of the State of Washington that the following is true and 10 correct: I am employed by Rainier Legal Center. At all times hereinafter mentioned, I was and am a citizen of the United 11 States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled 12 action, and competent to be a witness herein. 13 A true and correct copy of the document of which this is attached to [COMPLAINANTS' WITNESS LIST AND EXHIBIT LIST] was 14 delivered on this day in the manner so stated below: 15 Via U.S. First Class Mail, Facsimile, and Email to: The Washington Utilities 16 and Transportation Commission 1300 South Evergreen Park Dr. SW 17 Olympia, WA. 98504 Via Facsimile 360.586.1150 18 Via Email: atorem@utc.wa.gov 19 Via Email: rpearsonGutc.wa.gov Via U.S. First Class Mail and Email to: 20 Cristalina Water Company, LLC 21 Post Office Box 4055 Bellingham, WA. 98227 22 Via Email: maria@bellinghamhomes.net 23 Via U.S. First Class Mail and Email to: Eric P. Gillett, Esq. 24 Attorney at Law 901 Fifth Avenue, Suite 3400 25 Seattle, WA. 98164 Via Email: egillet@pregodonnell.com 26 DATED: 3/26/2014 27 Susan Burnett, Paralegal

COMPLAINANTS' WITNESS LIST AND EXHIBIT LIST - Page 4

28

BARRY C. KOMBOL #8145
RAINIER LEGAL CENTER, INC.
P.O. BOX 100
BLACK DIAMOND, WA 98010
(425) 432-8380 FAX (350) 866-2124

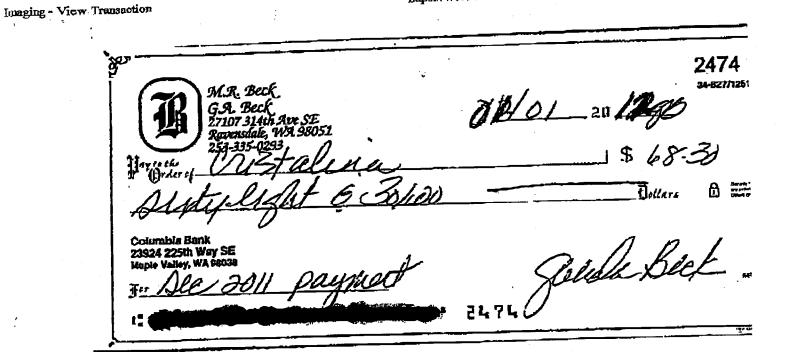
Rainier Legal Center, Inc.

EXHIBIT "A"

03/20/2014 13:12

https://web9.securei:

etbank.com/IMG_IMG1151/IMG1151.ashx?A



None

w363105a

02232012 010501001723676 >125104425 <

PEOPLES BANK FOR DEPOSIT ONLY CRISTALINA LLC 5067614080

PAGE 08/31

https://web9.securei/

netbank.com/IMG_IMG1151/IMG1151.aslix?A

Imaging - View Transaction

None

w363105a

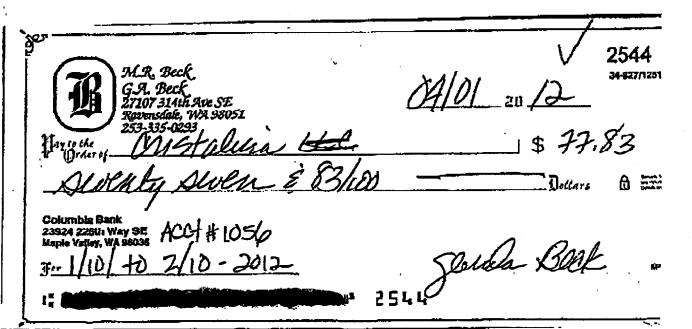
03152812 010581801837210 >125184425<

The Within Named Payse PEOPLES BANK

Imaging - View Transaction

https://web9.secureir

netbank.com/IMG_IMG1151/IMG1151.ashx?A



None

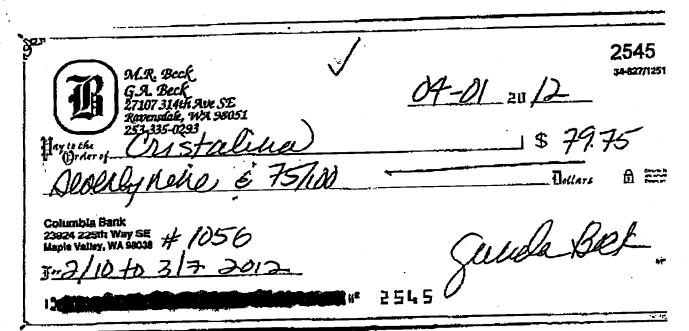
w363105a

94252612 616581882848268 >125184425

PAY THE CHOER OF PEOPLES BANK
FOR DEPOSIT ONLY
CRISTALINA LLC
5067614080

https://web9.securei

netbank.com/IMG_IMG1151/IMG1151.ashx?/



None

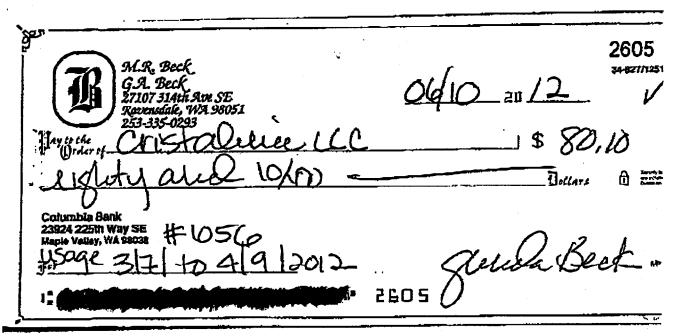
w363105a

18581882848278 >125184425<

EXHIBITE

https://web9.securei

netbank.com/IMG_IMG1151/IMG1151.ashx?



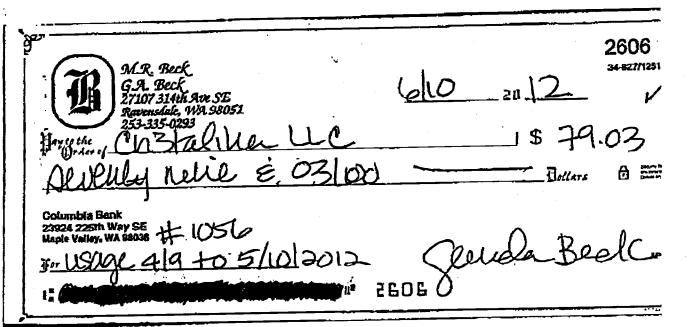
None

w363105a

98192012 | 010501002337858 > 125104425 <

https://web9.secureii

netbank.com/IMG_IMG1151/IMG1151.asbx?A



None

w363105a

92012 010501002337840 >125104425<

EXKIBITC

iew. Transaction

īma,

petbank.com/IMG_IMG1151/IMG1151.ashx?

https://web9.securei-

2643 34-627/1251 Rolling Beck Columbia Bank 23924 225th Way SE # 105 Maple Valley, WA 98038

None

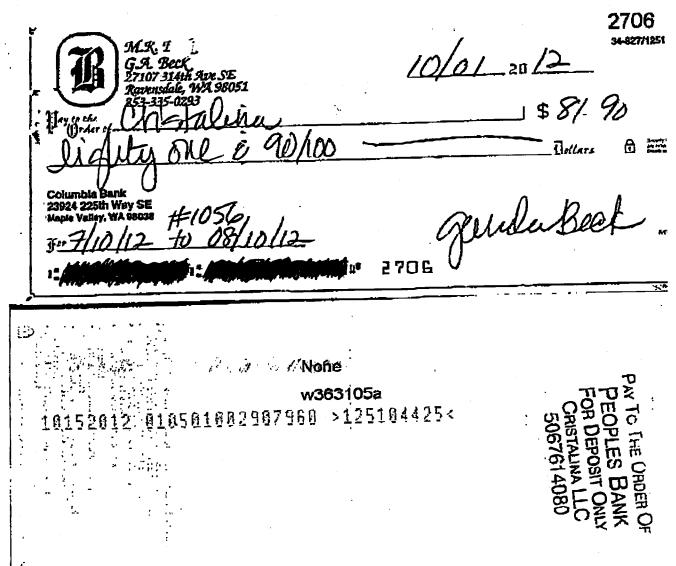
w363105a

010501002467020 >125104425<

- View Transaction

https://web9.securei/ netbank.com/IMG_IMG1151/IMG1151.ashx?A

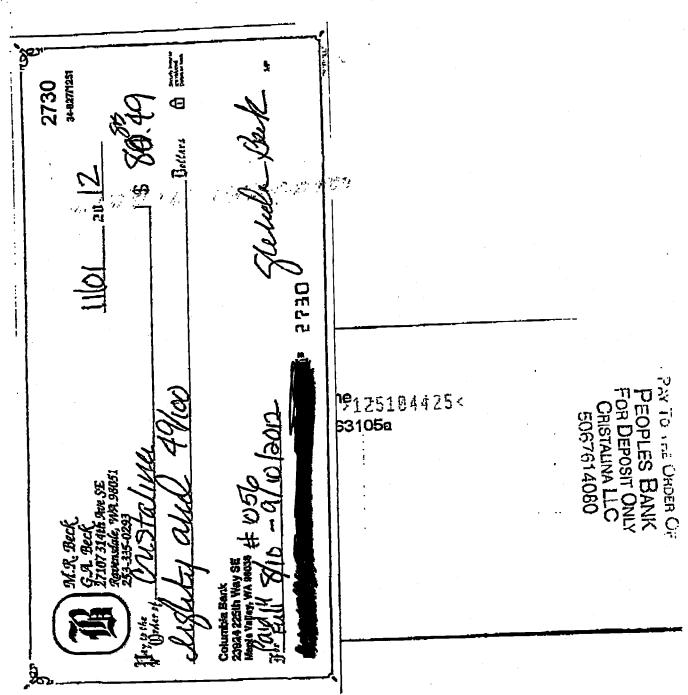
| SAR Beck | GA Beck | GA



EXKIBITC

Tow Transaction

https://web9.securei - petbank.com/IMG_IMG1151/IMG1151.ashx?A



https://web9.securei

petbank.com/IMG_IMG1151/IMG1151.ashxfe

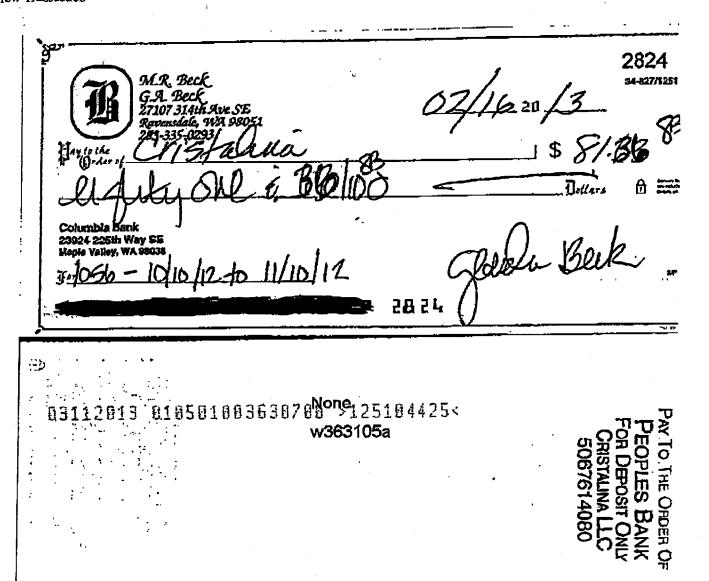
Mischie E MSM Debasorion

2823 Rovenstale, WA 98051 Gludabak Columbia Bank 23924 225th Way SE 28 23 501003630710^N9<mark>19</mark>25164425< _{0.}w363105a

DDA 1101144374 -

https://web9.securei

petbank.com/IMG_IMG1151/IMG1151.asbx?A



Cristalina LLC PO Box 2626 1200 Old Fairhaven Pkwy #106 Bellingham, WA 98227

Office Hours:

Telephone: 360-296-7318

VCCORN1 4	CUSTOMER NAME		RATE	TELEPHONE			977107 314th Ave SE	
1056	Beck, Michael & Gle		1	1 253-335-0293				
	Service	Number Days		Meter R	eadings Current	Usage in Cubic Feet	CHARGES	
From	То			revious 	35015	392		
12/10/20 Water Water	λ	31 Ilbi l Deed		12/10/13,	F19.2	3	40.00 7.25 32.00	
Capita	improve.	XIVIL	XUR	2e/ \$	179.2	5		
PREVI	OUS BALANCE/CRE			Ú			8724.32	
	ayment received wa		n 10/12	/2012	and the state of t		70.00	

·	
COMPARISONS	Days of Sen
Current Billing Period	31
Previous Billing Period	30
Same Period Last Year	391
RATE CODE DESCRIPTIONS 01: 8/4" service base (alle	Stepha
	Dicl

Cristalina LL PO Box 2626, 1200 Old Fairha Beilingham, WA 9

Water Bi

Beck, Michael & Glend€ 27107 - 314th Ave, SE

Ravensdale, WA 9805



https://web9.securei netbank.com/IMG_IMG1151/IMG1151.ashx?A

Imaging - V > Transaction

2902 34-427/1251 Columbia Bank 23924 225th Way SE Abbla Bei زع 06052013 010501004048890 >125104425< w363105a

Cristalina LLC PO Box 4545 1200 Old Fairhaven Pkwy #106 Bellingham, WA 98227

Telephone: 360-296-7318

Office Hours:

		٦	Telephor	e: 360-296	5-7318		
			507E	TELEPHON	NUMBER		ADDRESS
ACCOUNT #	GUSTOMER NAME. Beck, Michael & Gler	nda	1	253-335		27107 314th Ave SE	
1056				Meter	Readings	Usage in	CHARGES
	Service Number Days				Cubic Fest	CHARGES	
From	From To		Pr		Current	640.00	
4/10/201	4/10/2013 05/20/2013 40		30	36320 36730		410.00	40.00
Capita PREVI	BASE USAGE I improve. OUS BALANCE/CREI		o5/30/2		179.68 179.68		7,58 32,00 872,3,44
	Beck Beck 314M Ave SL	C	Xofile	_ 2n 13	2937 3-1271251	6/2013 /2013	8803.02 8879.08 3 Month 4+ M840
253 33	5-0233 15-0233			*	11100	79.22	8564.45
Brain of - LA	Marine	<u>January (n. 1888).</u> January (n. 1888).	<u> </u>	ح لين	19.08	DULES ARE AVA	RABLE LIPON REGUEST
Sumble Benk 924-2259 Wey SE ph Vekin WASSES H 10 3 17	y Nune 38/10	EPS	, N	rlibe	beek	te Fees; 2% Monthly bill is not paid by 08/30/2013 payment penalty of \$176.08 will be added to your bill sen & return with your payment payable to crediting to	

Cristalina LLC

PO Box 4545, 1200 Old Fairhaven Pkwy #106 Bellingham, WA 98227

Water Bill

Beck, Michael & Glenda 27107 - 314th Ave. SE

Ravensdale, WA 98051

ACCOUNT NUMBE	R DUE DATE	AMOUNT DUE.
1056	06/16/2013	8803.02
Billing Date	Rate Code	Meter#
05/21/2013	1	1056

https://web9.secure __netbank.com/IMG_IMG1151/IMG1151.ashx?A

M.R. BECK
G. A BECK
PRIVENSCALE, WASHOOSI
PRIPENSCALE, WASHOOSI
PR

None
w363105a

https://web9.secure

netbank.com/IMG_IMG1151/IMG1151.ashx?

Imaging - View Transaction

HOPE . LOVE . LIFE \$80.10 Dollars Lande Beck None w363105a

https://web9.secure

metbank.com/IMG_IMG1151/IMG1151.ashx?A

HOPE * LOVE * LIFE 3091

ALR. BECK
G. A BECK
STIOT 314TH AVE SE
RAVENSDALE, WA 88051
203-500-0000

STORY

ORIGINAL AND SOLUTION

COLUMNERS BANK
PROBA 205TH WAY BE
HAPLE VINLEY, WA 900HUS Bell VOICE
THE SIGNAL AND SOLUTION

TO SIGNAL BENEFIT SOLUTION

AND SIGNAL BENEFIT SOLUTION

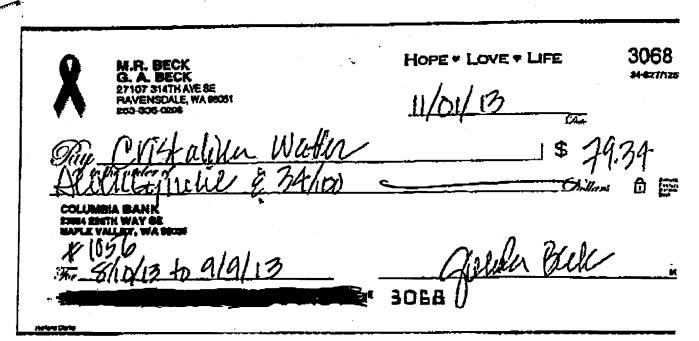
AND SIGNAL BENEFIT SOLUTION

TO SIGNAL BENEFIT SOLUTION

THE SIGNAL BENEFIT SOLUTION

None w363105a

https://web9.secure inetbank.com/IMG_IMG1151/IMG1151.ashx?



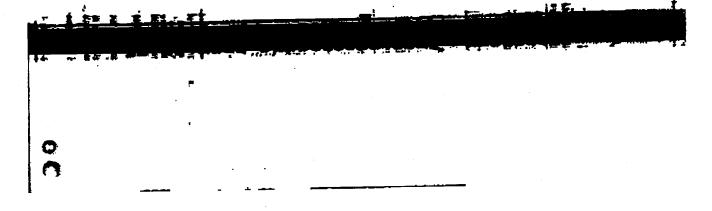
None

w363105a

https://web9.secure/ netbank.com/IMG_IMG1151/IMG1151.aslx?A.

None

w363105a



https://web9.secure

metbank.com/IMG_IMG1151/IMG1151.ashx?/

Imaging - View Transaction

HOPE * LOVE * LIFE 11/28/1 Telda Beck. None w363105a

M.R. BECK G. A. BECK 27107 314TH AVE S≜ RAYENSDALE, WA 98051 203-303-0283	12/05/13
On Cristalya	Lew Yout - Gotton a min
COLUMBIA BANK 23924 225TH WAY SE MAPLE VALLET, WA 98038	
37 Deposit and spated Acet to	***

EXHIBIT "B"

CRISTALINA, LLC (360) 296-7318

P.O. Box 4035, Bellingham WA 98227 1200 Old Fairhaven Parkway, Suite 106, Bellingham WA 98225

[X] FIRST NOTICE OF DISCONNECTION
[] SECOND NOTICE OF DISCONNECTION

TO:

Michael & Glenda Beck

SERVICE ADDRESS: 27107 314th Ave SE, Ravensdale, WA 98051

AND TO:

MAILING ADDRESS

PLEASE TAKE NOTICE your service is scheduled for DISCONNECTION.

Cristalina, LLC., a limited liability company, intends to disconnect water service at the first address listed above for non-payment of delinquent charges on or before 5:00 o'clock, p.m. on (11/20/2013). Your account balance is \$3,423.78, of which \$0 is current charges, not yet delinquent. In order to avoid disconnection, you must pay \$3,423.78 in full unless munally agreed upon payment arrangements are made with Cristalina, LLC.

Please send your payments to: Cristalina, LLC, P.O. Box 4055, Bellingham WA 98227.

To make mutually agreed upon payment arrangements, please call Cristalina, LLC's bookkeeper at (360) 296-7318 or (360) 483-9322. If mutually accepted arrangements are not kept, the company may disconnect service without further notice.

This notice shall expire after ten business days from the first day that the company may disconnect service, unless other mutually agreed upon arrangements have been made and confirmed in writing by the company.

If your service is disconnected for non-payment, a \$50.00 disconnect fee will be added to your account.

You will be liable for a \$50.00 reconnection charge. You may also be charged a security deposit on your account.

If you have any questions concerning this notice or would like to discuss the proposed disconnection of service you may call Cristalina, Lisc's manager, Maria Lindberg, at (360) 296-7321 or (360) 483-9322.

Cristalina, LLC

Authorized Signature

Date of Mailing/Delivery of this notice: (1-5-2013

EXHIBITA

[] Maria:

I have completed my investigation into the customer's account history, based upon the information provided by the company during the course of the complaint. The customer's account must be adjusted by issuing a credit of \$5,526.48. I will explain below why the customer's account belance is incorrect, and I expect it to be changed. I will assume that you have made the required corrections, regardloss of whether you respond to this email or not. I will be providing the customer my findings as well, and telling her to expect this credit to appear on her next bill. She will be instructed to call us back if her next bill is not credited.

I recalculated the customer's account history, using a starting balance of \$0 as of Oct. 1, 2007. I added the customer's bills, plus the tariffed 2% late fees, and all of the corrected bills, missing late fees, and missing bills up to June 15, 2013. I did not include either of the 2011 bad debt write offs, or any charges or payments that may have occurred since the account history was provided on July 3, 2013. Based upon my findings, the customer's total balance as of June 15 (prior to whenever the June bill was issued) should be \$3,423.78.

There are several reasons for the large difference (\$5,526.48) between the figure you provided (\$8,950.26), and the figure I came to (\$3,423.78). Most notably, the 6-year statute of limitations applies to this customer. Going back six years from today, we find that on Oct. 1, 2007, the customer's account balance was \$20,928.14. Because this balance was accumulated before the statute period, it should be written off. The company may still attempt to collect the money from the customer, or send the customer to collections, but this balance cannot affect the customer's account. Indeed, of the \$20,928.14 balance, \$20,919.19 was written off in 2011.

Of the 49 late fees (or "finance charges") charged since Oct. 1, 2007, I could not find a single instance where the company charged a 2% late fee (the rate in the tariff). The actual interest charged fluctuated between 0.4% and 4.76%. In addition to the incorrect late fees, there were 20 instances where no late fees were charged. There were 10 months in a row where the customer was not charged for water service at all. An additional 8 bills were charged an incorrect rate.

I recalculated the customer's account history, using a starting balance of \$0 as of Oct. 1, 2007. I added the customer's bills, plus the tariffed 2% late fees, and all of the corrected bills, missing late fees, and missing bills up to June 15, 2013. I did not include either of the 2011 bad debt write offs, or any charges or payments that may have occurred since the account history was provided on July 3, 2013. Based upon my findings, the customer's total balance as of June 15 (prior to whenever the June bill was issued) should be \$3,423.78.

I previously recorded violation of WAC 480-110-385(3)(a) - (1 count on July 25, and 9 counts on Sept. 20). I am updating the violation count and description as follows:

Violation of WAC 480-110-385(3)(a) - (76 counts) - because after the company investigated the informal complaint, it failed to provide a complete response to the commission staff within two business days. On June 13, I requested a copy of the customer's statement for March 2013, an account history, the letter that was sent to the customer in March 2013, and clarification of which bills were sent late, not sent at all, or returned for insufficient postage for the period of December 2012, to March 2013. The response was due June 17, by 5:00

EXHIBITA

3/26/2014

LAW OFFICES

of

RAINIER LEGAL CENTER, INC. P.S.

31615 MAPLE VALLEY HIGHWAY

BARRY C. KOMBOL Artorney at Law

Date:

POST OFFICE BOX 100 BLACK DIAMOND, WASHINGTON 98010

(360) 886-2868 (425) 432-3380 FAX (360) 886-2124

FAX COVER SHEET

• • • • • • • • • • • • • • • • • • • •
Please deliver the following pages to:
NAME: The WUTC, Attn: Clerk
FIRM: Clerk of WUTC
FAX #:_360-586-1150
FROM: Barry C. Kombol
We are transmitting 33 pages including this cover page.
If you do not receive all pages, please call us immediately at:
(425) 432-3380
Operator: sjb
ORIGINAL: [] WILL BE FORWARDED [X] WILL NOT BE FORWARDED NOTES: In Re the Complaint of Mike and Glenda Beck
Against Cristalina Water Co., Case Nos. 117759 & 132268
Attached please find cover letter to WUTC and
Complainants' Witness List and Exhibit List

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS ATTORNEY PRIVILEGED AND CONFIDENTIAL AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPY OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE (POSTAGE PAID BY BARRY C. KOMBOL, ATTORNEY AT LAW). THANK YOU.

LAW OFFICES

of

RAINIER LEGAL CENTER, INC. P.S.

31615 MAPLE VALLEY HIGHWAY
POST OFFICE BOX 100

BLACK DIAMOND, WASHINGTON 98010

(360) 886-2868 (425) 432-3380

FAX (360) 886-2124

BARRY C. KOMBOL
Attorney at Law
rainicales al@yahoo.com

March 26, 2014

Via Facsimile: 360-586-1150

The Washington Utilities and Transportation Commission 1300 South Evergreen Park Dr SW Olympia, WA. 98504

Attn: Clerk

Re: In Re the Complaint of Mike and Glenda Beck Against Cristalina Water Company Case Nos. 117759 and 132268 "Complainants' Witness List and Exhibit List"

Dear Clerk:

Enclosed herein please find Mike and Glenda Beck's "Complainants' Witness List and Exhibit List."

Please file today this Complainants' Witness List and Exhibit List on behalf of Mike and Glenda Beck which is due by March 28th.

Should you have any questions, please do not hesitate to call. Thank you for your assistance in this matter. I remain,

Very truly yours,

Barry C. Kombol

Rainier Legal Center, Inc. P.S.

BCK:sjb

Attachment (Complainants' Witness List and Exhibit List)

cc: Mike and Glenda Beck (Enclosure)

```
Æ –
```

```
1
2
3
4
5
ĸ
                   BEFORE THE WASHINGTON UTILITIES
                    AND TRANSPORTATION COMMISSION
7
8
   In Re the Complaint of:
                                         No. 117759 and
9
                                         No. 132268
   MIKE and GLENDA BECK,
10
                                    COMPLAINANTS' WITNESS LIST AND
        against
11
                                    EXHIBIT LIST
   CRISTALINA WATER COMPANY.
12
              Regulated Utility.
13
14
              The Washington Utilities
    To:
              and Transportation Commission
15
              1300 South Evergreen Park Dr. SW
              Olympia, WA. 98504
16
              Via Facsimile 360.586.1150
              Via Email: atorem@utc.wa.gov
17
              Via Email: rpearson@utc.wa.gov
18
              Cristalina Water Company, LLC
    And to:
              Post Office Box 4055
19
              Bellingham, WA.
                               98227
              Via Email: maria@bellinghamhomes.net
20
              Eric P. Gillett, Esq.
21
    And to:
              Attorney at Law
              901 Fifth Avenue, Suite 3400
22
              Seattle, WA.
                             98164
              Via Email: egillet@pregodonnell.com
23
          YOU, EACH OF YOU, are advised that the undersigned hereby
24
    gives notice that pursuant to Washington State Administrative
25
    Rules relating to proceedings of this sort and on behalf of the
26
    Complainants, he discloses names, addresses and nature of
27
```

COMPLAINANTS' WITNESS LIST AND EXHIBIT LIST - Page 1

28

BARRY C. KOMBOL #8145

RAIN(ER LEGAL CENTER, INC.

P.O. BOX 100

BLACK DIAMOND, WA 98010

(425) 432-3380 FAX (950) 886-2124

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

expected testimony of Complainants' MIKE and GLENDA BECK's Witnesses.

Lay Witnesses

1. Glenda Beck, Complainant 27107-314th Avenue S.E. Ravensdale, WA. 98051 (253) 335-0293

Complainant Glenda Beck may testify regarding facts relating to the failure of the regulated utility to furnish her with proper, adequate or statutory notice prior to the disconnection of water service to their residence in November of 2013.

Mrs. Beck may further testify that she has maintained her household's water utility account with Respondent totally current since 2010. Mrs. Beck may also testify that the regulatory utility lost or failed to negotiate some of her utility payment checks; that there have been billing and crediting errors in their account with Cristalina and its predecessors for several decades.

Mrs. Beck may testify about the failures of Cristalina Water System and its predecessors, dating back for more than thirty years for failure to furnish her household with sufficient qualities and quantities of potable water for extended weeks on end.

Mrs. Beck may testify about the need she has for potable water for herself as regards her medical difficulties as well as for the sanitary needs of members of her household.

Mike Beck, Complainant 27107-314th Avenue S.E. Ravensdale, WA. 98051 (253) 335-0293

27 28

> BARRY C. KOMBOL #8145 RAINIER LEGAL CENTER, INC. P.O. BOX 100 BLACK DIAMOND, WA 98010 (425) 432-3880 PAX (350) 886-2124

3 4

б

. 5

7

9

10 11

12 13

14

15 16

17 18

19

20

21 22

23

24 25

26

27

28

Complainant Mike Beck may testify regarding facts relating to the failure of the regulated utility to furnish him with proper, adequate or statutory notice prior to the disconnection of water service to their residence in November of 2013.

Michael Beck may further testify that he has maintained his household's water utility account with Respondent totally current since 2010. Mr. Beck may also testify that the regulatory utility lost or failed to negotiate some of his utility payment checks; that there have been billing and crediting errors in their account with Cristalina and its predecessors for several decades.

Michael Beck may testify about the failures of Cristalina Water System and its predecessors, dating back for more than thirty years for failure to furnish his household with sufficient qualities and quantities of potable water for extended weeks on end.

Mr. Beck may testify about the need his family has for potable water for the medical and sanitary needs of his household.

Expert Witnesses: None.

FURTHER, EACH OF YOU, are advised that the undersigned hereby gives notice that the Complainants will submit at Evidentiary Hearing in this matter the following Exhibits and Documents:

Exhibit A: Copies of Checks from 1/1/2012 to 12/5/2013 for current water service

payments

Exhibit B: Cristalina, LLC's First Notice of Disconnection

BARRY C. KOMBOL #8145

RAINIER LEGAL CENTER, INC.
P.O. BOX 100

BLACK DIAMOND, WA 98010

(425) 432-3880 FAX (560) 886-2124

Complaintants reserve the right to amend or supplement 2 this Primary Witness and Exhibit List. 3 DATED this 26th day of March/,/201 4 Washington. 5 6 MARRY C. KOMBOL, WEDA #8145 Attorney for Complainants 7 MIKE and GLENDA BECK 8 CERTIFICATE OF SERVICE 9 I, Susan Burnett, declare under penalty of perjury under the laws of the State of Washington that the following is true and correct: I am employed by Rainier Legal Center. At all times hereinafter mentioned, I was and am a citizen of the United 10 States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled 12 action, and competent to be a witness herein. 13 A true and correct copy of the document of which this is attached to [COMPLAINANTS, WITNESS LIST AND EXHIBIT LIST] was 14 delivered on this day in the manner so stated below: 15 Via U.S. First Class Mail, Facsimile, and Email to: The Washington Utilities 16 and Transportation Commission 1300 South Evergreen Park Dr. SW 17 98504 Olympia, WA. Via Facsimile 360.586.1150 18 Via Email: atorem@utc.wa.gov Via Email: rpearson@utc.wa.gov 19 Via U.S. First Class Mail and Email to: 20 Cristalina Water Company, LLC Post Office Box 4055 21 98227 Bellingham, WA. Via Email: maria@bellinghamhomes.net 22 Via U.S. First Class Mail and Email to: 23 Eric P. Gillett, Esq. 24 Attorney at Law 901 Fifth Avenue, Suite 3400 Seattle, WA. 98164 Via Email: egillet@pregodonnell.com

ЕУ

Susan Burnett, Paralegal

Rainier Legal Center, Inc.

COMPLAINANTS' WITNESS LIST AND EXHIBIT LIST - Page 4

DATED: 3/26/2014

26

27

28

BARRY C. KOMBOL #8145 RAINIER LEGAL CENTER, INC. P.O. BOX 100 BLACK DIAMOND, WA 98010 (425) 432-3350 PAX (360) 886-2124

EXHIBIT "A"

https://web9.securei:

stbank.com/IMG_IMG1151/IMG1151.ashx?A

Imaging - View Transaction

2474

34-827/1281

31. Beck

G.R. Beck

27107 314th Ave SE

Raprisole, WA 98051

259-335-0293

Autifly of Columbia Bank

23924 225th Way SE

Maple Valley, WA 68038

For Della 2011 payment

Selections

All Della Selection

None

w363105a

02202012 010501001720670 +125104425

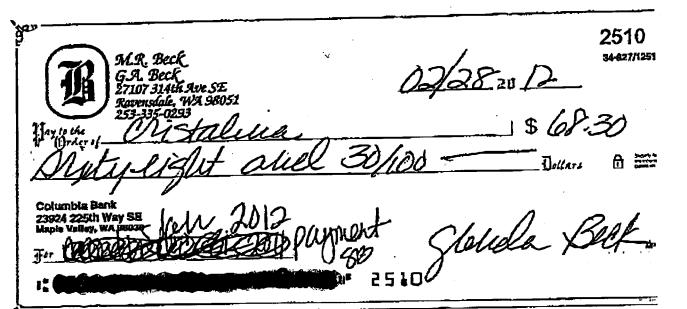
PEOPLES BANK
FOR DEPOSIT ONLY
CRISTALINA LLC
5067614080

PAGE 09/32

https://web9.secureir

hbank.com/IMG_IMG1151/IMG1151.ashx?A

Imaging - View Transaction



None

w363105a

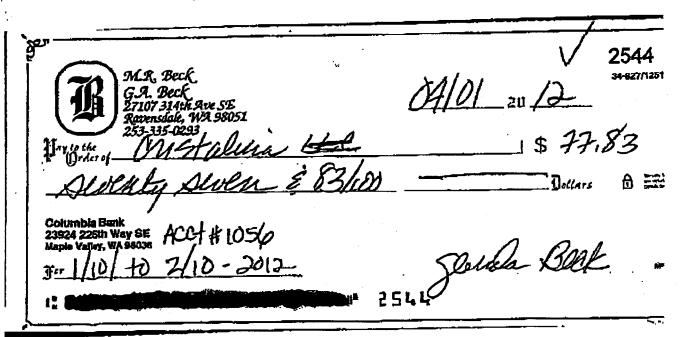
03152012 010501001037210 >125104425<

DEFUSITED TO THE CREDIT OF THE WITHIN Named Paysa PEOPLES BANK

Imaging - View Transaction

https://web9.secureir

atbank.com/IMG_IMG1151/IMG1151.ashx?A



None

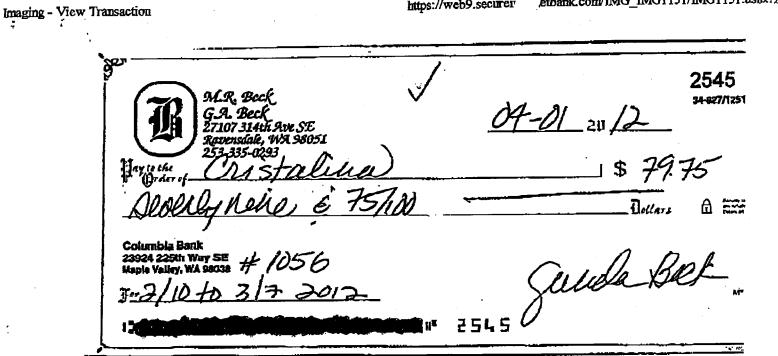
w363105a

84252612 818581882848268 >1251844254

PAY TO THE OHDER OF PEOPLES BANK
FOR DEPOSIT ONLY
CRISTALINA LLC
5067614080

https://web9.secureiv

etbank.com/IMG_IMG1151/IMG1151.ashx?



None

w363105a

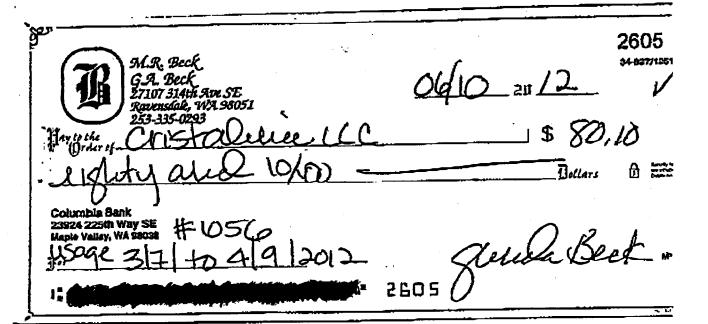
010501002040278 >125104425

EXHIBITE

Ingaging - View Transaction

https://web9.securei

etbank.com/IMG_IMG1151/IMG1151.ashx?



None

w363105a

08192812 910591002337850 >125104425<

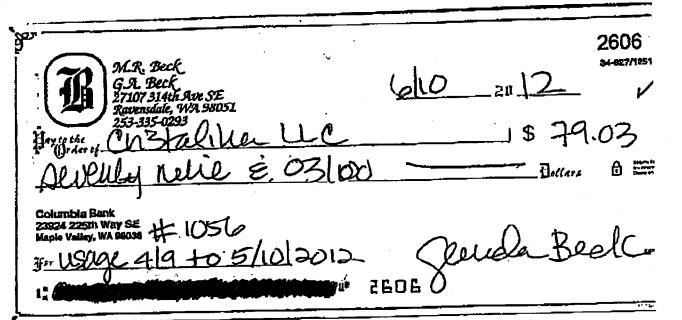
PAY TO THE CHIDEN OF PEOPLES BANK FOR DEPOSIT ONLY CRISTALINA LLC 5087614080

EXMIBITC

boaging - View Transaction

https://web9.securei;

bank.com/IMG_IMG[151/IMG][151.ashx?A



None

w363105a

08192012 010581002337840 >125104425<

PEOPLES BANK
FOR DEPOSIT ONLY
CRISTALINA LLC
5067614080

EXKIBITC

https://web9.secureir etbank.com/IMG_IMG1151/IMG1151.ashx?/

Ima,

new Transaction

2643 34-827/1251 Columbia Bank 23924 225th Way SE Manda Valley, WA 98038 rolled Beck

None

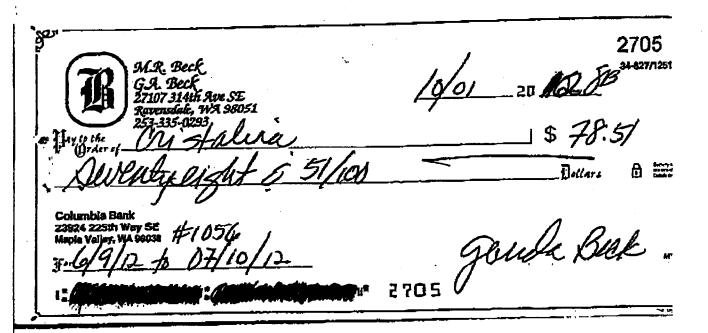
w363105a

016581882467828 >125184425<

- View Transaction https://web

https://web9.secureir

Mount com/IMG_IMG1151/IMG1151.ashx?A

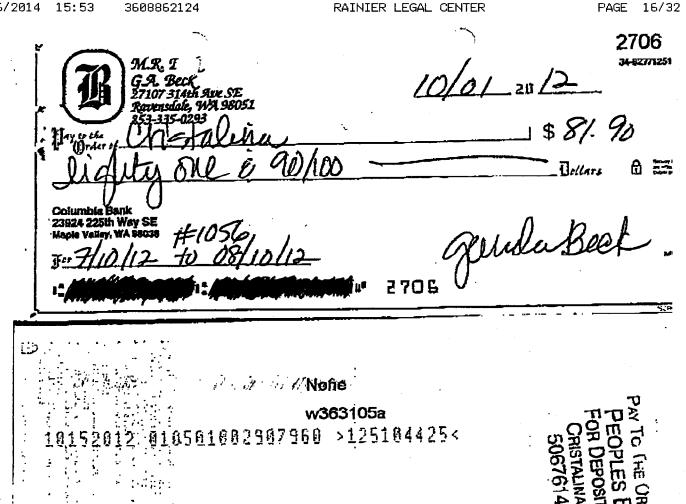


None

w363105a

16152612 018581882987988 >125184425<

PAY TO THE ORDER OF PEOPLES BANK FOR DEPOSIT ONLY CRISTALINA LLC 50676140R0



EXMIBITC

'Yew Transaction

tbank_com/IMG_IMG1151/IMG1151.ashx?A https://web9.securein9125104425< **53105**a

https://web9.securei

etbank.com/IMG_IMG1151/IMG1151.ashxfc

threing E View ileunsaction

2823
3A.R. Beck
G.A. Beck
27107 314th Ave SE
Revensulate, WA 98051
35-335-029

Sold A M. C. SE
Revensulate, WA 98051

Columniate Bank
23924 225th Way SE
Maple Valley, WA 98038

Ter # 1056 - 9/10/12 to 10/10/12

Galletian

Revensulate

Revensulate

A M. C. Se
Revensul

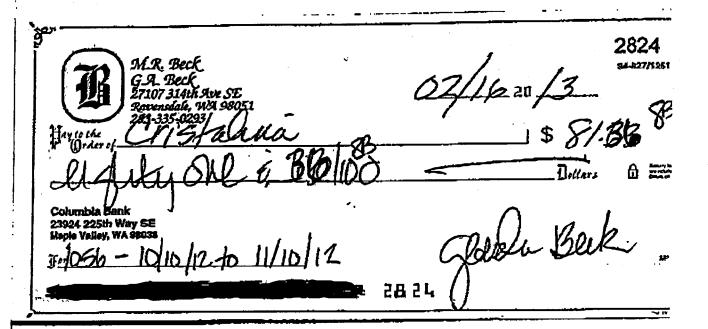
PEOPLES BANK FOR DEPOSIT ONLY CRISTALINA LLC 5067514080

Account: DDA 1101144874 - /

Imaging - View Transaction

https://web9.securei

htbank.com/IMG_IMG1151/IMG1151.ashx?/



B1850108363876Hone125104425< w363105a

EXMISIT C

Cristalina LLC PO Box 2626 1200 Old Fairhaven Pkwy #106 Bellingham, WA 98227

Telephone: 360-296-7318

lingham, WA 9822/

Office Hours:

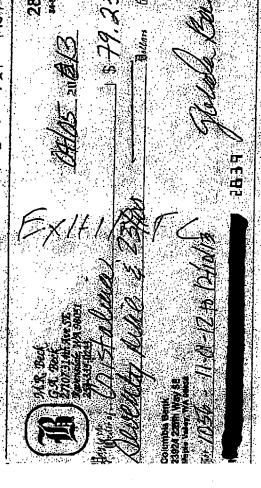
RATE TELEPHIONE NUMBER **CUSTOMER NAME** ACCOUNT# 27107 314th Ave SE 253-335-0293 Beck, Michael & Glenda 1056 Meter Readings Usage in Service Number CHARGES Cubic Feet Days Current **Previous** To From 392 35015 11/01 liz to 12/10/13 1179.23 Ecen Ber 179.23 34623 01/10/2013 12/10/2012 40.00 Water BASE Water USAGE **32.00** Capital Improve. anuerey \$ 79.25 PREVIOUS BALANCE/CREDIT Last Payment received was \$81_90 on 10/12/2012

COMPARISONS	Days of Sen
Current Billing Period	31
Previous Billing Period	30
Same Period Last Year	391
RATE CÔDÉ DESCRIPTIONS 01: 3/4" service base rate	Stepha
	Dicl

Cristalina LL: PO Box 2826, 1200 Old Fairh: Beilingham, WA 9

Water Bi

Beck, Michael & Glenda 27107 - 314th Ave. SE Ravensdale, WA 98054 Committee of the control of the cont



NI,

Date

201

Imaging - V. Transaction

https://web9.securei

hbank.com/IMG_IMG1151/IMG1151.ashx?

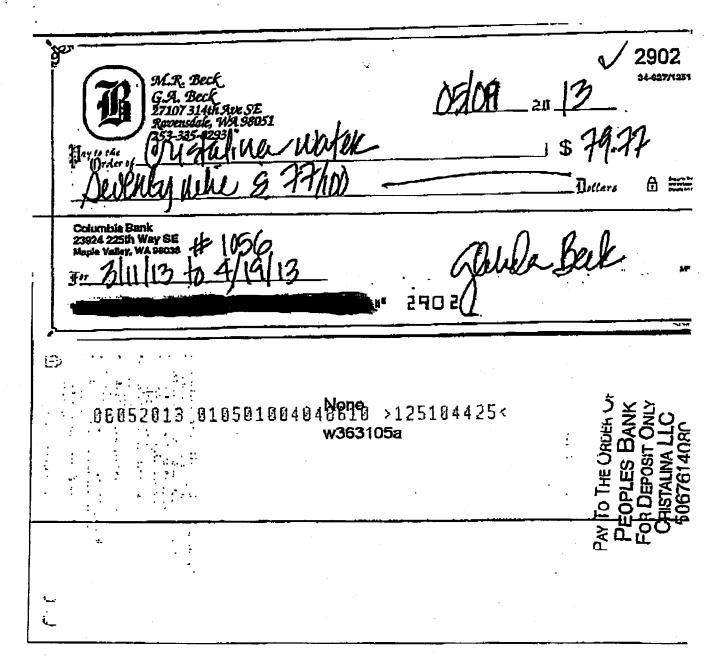


EXHIBIT -

Cristalina LLC PO Box 4545 1200 Old Fairhaven Pkwy #106 Bellingham, WA 98227

Office Hours:

Telephone: 360-296-7318

ACCOUNT# CUSTOMER NAME			REGMEN PROPERTY TAR			SERVICE ADDRESS	
1056	Beck, Michael & Gle	nda	1	253-33	5-0293	27107	314th Ave SE
From	. Service	Number Days	Pı	Meter evîous	Readings Current	Usage in Cubic Fest	CHARGES
4/10/2013		40	3	5320	36730	410.00	
PREVIC			05/30/2		79.68		40,00 7:58 32:00 6725:44
-	in a second seco	The second se		r yaki .	2937	6/2013	8803.02
G.A. B.	DECK ELC THE THE STE	\wedge	Lalita	20 13	34-02 7/1201	/2013	89.6.68
Resterned	ik, 1914 98051 1925 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1927 1	<u> </u>	W. C. S. C.	<u> </u>	1250	2 Month 79.22	3 Month 44 Month 8564.4
70 of - CA 1	naure	en e		<u> </u>	41.178	DULES ARE AVAI	LABLE UPON REQUEST
NONE Samk 225th Way St Why, VANGERS 10012 11013		Q	, Se	ide <u>l</u>	ies de	te Fees: 2% Monthly bill is not paid by 06/30/2013 s payment penalty of \$176.06 will be added to your bill ech & fetom with your payment payable to Chisalina I	

Cristalina LLC PO Box 4545, 1200 Old Fairhaven Pkwy #106 Bellingham, WA 98227

Water Bill

Beck, Michael & Glenda 27107 - 314th Ave. SE

Ravensdale, WA 98051

ACCOUNT NUMBE	R. DUL DATE	AMOUNT DUE
1056	06/16/2013	8803.02
Billing Date	Rate Code	Meter#
05/21/2013	1	1056

https://web9.secure

netbank_com/IMG_IMG1151/IMG1151.ashx?A

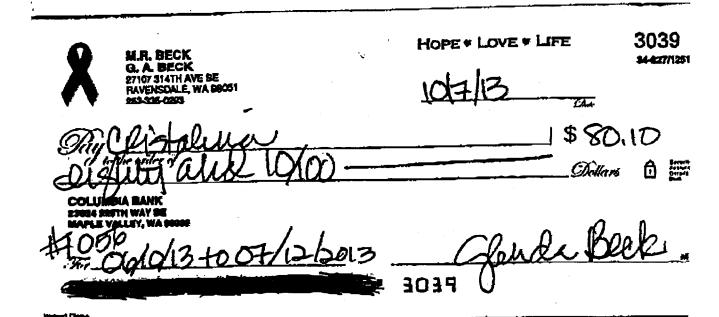
Imaging - View Transaction

3038 HOPE + LOVE - LIFE \$81.56 Dollars a zeula Beck 2013 40 08/15/2013

None w363105a

Imaging - View Transaction

https://web9.secure ____nerbank.com/IMG_IMG1151/IMG1151.ashx?.



None w363105a

(maging View Transaction

https://web9.secure

metbank.com/IMG_IMG1151/IMG1151.ashx?/

M.R. BECK G. A. BECK 27:07 314TH AVE 8E RAVENSOALE WA SECS1 2514336-0293	HOPE + LOVE + LIFE 3091
Dij Orthuna	40/100 - Dillars 10 1000
HIDSO HOLD CONTO	Genela Beek
Martin Co-fe	# 3091 <i>0</i>

None w363105a



netbank.com/IMG_IMG1151/IMG1151.asbx?/

Imaging - View Transaction

https://web9.secure

M.A. BECK
G. A. BECK
G

None w363105a

https://web9.secure/ betbank.com/IMG_IMG1151/IMG1151.ashx?A

(maging - View Transaction

HOPE + LOVE + LIFE 11/26/13 Teleba Beek

> None w363105a

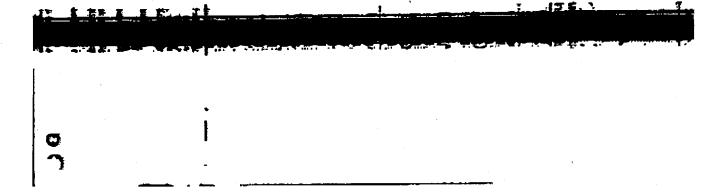
.

Imaging - View Transaction

https://wcb9.secure netbank.com/IMG_IMG1151/IMG1151.ashx?A

M.R. BECK G. A. BECK 27 107 314TH AVE SE PLAVENSDALE, WA 95081	HOPE * LOVE * LIFE	3092 34437/1281
Stotaly whe 86/100		79,8%
COLUMBIA BANK SUBJECTH WAY BE MAPLE VALLEY, WASHINGT # 1056 TO 15/13 to 11/10/13	Qelda_	Beck.
Hartie Dane	1092/	

None w363105a



M.R. BECK
G. A. BECK
27107 SIATH AVE SE
PAVENSDALE, WAS SOUTH
12/05/13

SAME STATES

EXHIBIT "B"

STALINA, LLC (360) 296-7318

P.O. Box 4055, Beilingham WA 98227 1200 Old Fairhaven Parkway, Suite 106, Bellingham WA 98225

[X] FIRST NOTICE OF DISCONNECTION SEGOND NOTICE OF DISCONNECTION

3608862124

TO:

Michael & Glenda Beck

SERVICE ADDRESS: 27107 314th Ave SE, Ravensdale, WA 9885

AND TO:

MAILING ADDRES

PLEASE TAKE NOTICE your service is scheduled for DISCONNECTION.

Cristalina, LLC, a limited liability company intends to disconnect water service at the first address listed above for non-payment of delinquent charges on or before 5:00 o'clock, p.m. on (11/20/2013). Your account balance is \$3,423.78 of which \$0 is current charges, not yet delinquent. In order to avoid disconnection, you must pay \$3,423.78 in full indess mutually agreed upon payment arrangements are made wiff Cristalina, LLC.

Please send your payments to: Cristofine, LLC, P.O. Box 4055, Bellingham WA 98227.

To make mutually agreed upon payment arrangements, please call Cristalina, LLC's bookkeeper at (360) 296-7318 or (360) 483-9322. If multially accepted arrangements are not kept, the company may disconnect service without further notice.

This notice shall expire after ten business days from the first day that the company may disconnect service, unless other mutually agreed upon arrangements have been made and confirmed in writing by the company.

If your service is disconnected for non-payment, a \$50.00 disconnect fee will be added to your account. You will be limble for a \$50.00 reconnection charge. You may also be charged a security deposit on your

If you have any questions concerning this notice or would like to discuss the proposed disconnection of service you may call Cristalina. Ligg's manager, Maria Lindberg, at (360) 296-7321 or (360) 483-9322.

Cristalina, LLC

Authorized Signature

Date of Mailing/Delivery of this notice:

EXHIBITA

TRANSMISSION VERIFICATION REPORT

TIME : 03/25/2014 15:20 NAME : RAINIER LEGAL CENTER FAX : 3608862124 TEL : 3608862124 SER.# : 00007J551639

DATE, TIME FAX NO./NAME DURATION PAGE(S) RESULT MODE

03/26 15:12 13605861150 00:07:44 31 OK STANDARD ECM