UW-220086



January 28, 2022

Amanda Maxwell Executive Director and Secretary Washington Utilities and Transportation Commission 1300 South Evergreen Park Drive SW Olympia, WA 98504-7250 Records Management 01/28/22 10:59 State Of WASH UTTIL. AND TRANSP COMMISSION

Re: Blue Rock Water Company LLC - First Revision of Sheet No. 7 Canceling Original Sheet No. 7, First Revision of Sheet No. 8 Canceling Original Sheet No. 8, First Revision of Sheet No. 9 Canceling Original Sheet No. 9, First Revision of Sheet No. 10 Canceling Original Sheet No. 10, First Revision of Sheet No. 11 Canceling Original Sheet No. 11, First Revision of Sheet No. 12 Canceling Original Sheet No. 12, First Revision of Sheet No. 14 Canceling Original Sheet No. 14, First Revision of Sheet No. 15 Canceling Original Sheet No. 15, First Revision of Sheet No. 22 Canceling Original Sheet No. 22, First Revision of Sheet No. 60 Canceling Original Sheet No. 60

Dear Ms. Maxwell,

Attached you will find the above-referenced tariff pages. The purpose of this filing is to add a Winter No-Read period for the Sunnyhills Water System (DOH ID# 23391F). Additionally, the company removed Rule 25 pertaining to credit card chargebacks as it was outdated. The company proposes to increase the Service Connection fee from \$350 to \$950. Finally, the company suggests updating its Ancillary Charges including migrating service visit charges from a flat fee to an hourly rate and removing credit card chargebacks from the schedule (related to Rule 25). Attached are the letters sent to customers. The company is providing the required thirty (30) day notice.

This filing will not generate additional revenue for the company; therefore the company is not submitting depreciation schedules, proforma adjustments, and other materials, excluding those referenced in the letter, as required by WAC 480-07-530 and requests a waiver of that rule to the extent necessary.

The proposed Ancillary Charges adjustments will remove outdated credit card chargeback fees that are currently not assessed to customers. It will also migrate the service charges from a flat fee to an hourly rate, consistent with the Commission's current language and approach to cost reimbursement for customer-generated activity. It also mitigates customer service fees for requests that require less time. The company expects no impact on earnings as a result of these changes and anticipates the service fees could be offsetting.



The proposed water connection service charge increase from \$350 to \$950 is a contribution in aid of construction fee that, by design, will not impact the company's income. Additionally, this proposed fee increase will have no impact on existing customers. The new rate better reflects the value of a service connection for the current water system service area geography.

Finally, the Winter No-read period would have minimal impact on earnings; it is a cash flow adjustment the company is financially capable of managing as it impacts a single water system. There are no substantial cost savings as the company will still maintain, inspect and test the Sunnyhills water system throughout the winter to be compliant with the Department of Health requirements. Rather it is a cost avoidance proposal to mitigate rising costs associated with the labor necessary to meter read during a period when accessing meters can be difficult and in an area comprised predominantly of vacation homes that are less frequented during the winter months.

Mr. Jason Dorland has the authority to issue tariff pages on behalf of the company and the undersigned has the authority to file those tariff pages on behalf of the company.

Sincerely,

Sara Dorland Finance Manager

Enclosures

Cc: Jason Dorland (via email)