

Puyallup School District

Education Support

Rudolph J.K. Fyles A.I.A., Executive Director of Facilities

May 25, 2010

VIA EMAIL AND U.S. MAIL

David Danner
Executive Director
Washington Utilities and
Transportation Commission
1300 South Evergreen Park Drive S.W.
Olympia, WA 98504-7250

Re: Docket #UW-091466: Rainier View Water Company Proposed Rate Increase and Tariff Revisions

Dear Director Danner:

Puyallup School District (the "District") submits this letter and attachment as a formal comment regarding the above-requested rate increase (the "Rate Increase") and tariff revisions (the "Tariff Revision") proposed by Rainier View Water Company.

I. The Absence of Notice of the Rate Increase and the Unprecedented Rate Increase is an Unreasonable Burden for School Districts

For the following reasons, the District opposes the proposed Rate Increase and requests that the Commission suspend the proposed Tariff Revision and set this matter for public hearing, or, in the alternative, either deny the proposed Rate Increase or phase in a rate increase for schools at a reasonable rate of increase of no more than 10% to 15% a year:

1. The District received no notice of the Rate Increase as currently proposed before the Commission and only recently learned of the proposed Rate Increase. The District has not had an opportunity to review the various UTC Staff Reports and materials submitted by Rainier View Water Company to prepare a detailed response to the proposed Rate Increase. Thus, the District has been precluded from adequately preparing a response to the proposed Rate Increase, and because of the absence of reasonable notice, the District is not able to appear or be represented before the Commission on May 27 to formally presents its objections to the Rate Increase given the absence of proper and sufficient notice.

2. In about September 2009, the District had communication with Bob Blackman, Manager of Rainier View Water Company, regarding a proposed rate increase. Mr. Blackman advised the District that the rate increase would be between 3% and 4%. Accordingly, the District has budgeted a 3% to 4% increase for water service from Rainier View Water Company.

Facilities Department

3. With the significant budgetary constraints created by reduced State revenue collection, the District contacted all of its utility providers, including water providers, to determine rate increases to budget for the next year. The School Budget process has taken on critical importance as any significant differences from budget forces cuts in other areas. Increases cannot be simply absorbed.

4. The District will experience a 114% increase of its water bills at Carson Elementary School¹ based upon the proposed Tariff Revision. Attached hereto is a Spreadsheet showing the existing Tariff Rate compared to the proposed Tariff Revision based upon water usage and meter size. (Carson Elementary School was opened Fall of 2007.) The District has not budgeted for this increase given that it was told by Rainier View that an increase would be only in the 3% - 4% range. An increase of 114% will have an adverse impact to the District's budget for Carson Elementary School.

5. This unprecedented increase further exceeds any expectation for increased water rates especially given that the 114% increase exceeds increases proposed by all of the other water providers servicing Puyallup schools by over 100%. The single largest rate increase proposed by another water provider servicing Puyallup School District is 10% - 14%. Puyallup School District is served by six (7) water providers, including Firgrove Water Company, Summit Water, Mt. View-Edgewood Water Company, Fruitland Water, City of Milton, Tacoma Public Utilities, and Rainier Water Company.

6. School Districts are unique water users. School Districts are not large consumers of water for aesthetic purposes. School Districts are large consumers of water because School District fields are an essential component, and in some cases, the sole source, of a community's recreational services. In fact, many municipalities allow developers of residential subdivisions to include School District fields to satisfy a development's park requirements.

7. As is evident from the attached Spreadsheet, the most significant water usage occurs during the Spring and Summer months when a School District is irrigating its fields. Without this irrigation, these fields would quickly become unusable. Given the tremendous use of school fields, the fields must be maintained. In addition to our student use, Puyallup School District fields are continually used by various youth organizations throughout the spring, summer, and early fall for multiple purposes, including local soccer clubs, baseball leagues, and football leagues. It is not simply the case of wanting the greenest lawn on the block. Turning off the water means closing school fields for students and the community.

8. School Districts, thus, are an essential public function that serve not only the needs of its students but the community at large. Consideration must be given to this function in determining an appropriate increase.

¹ Puyallup School District has one school within the Rainier View Water Company service area.

II. The Commission Should Set the Matter for Hearing or, in the Alternative, Deny the Proposed Rate Increase

The proposed Rate Increase is unprecedented. Puyallup School District planned for only a 3% to 4% increase based upon communication from Rainier View Water Company. A 114% increase will require unexpected budget cuts in other areas at Carson Elementary School.

In addition, an unprecedented Rate Increase should not be adopted without adequate public notice. There is no justification for the absence of required notice. This is not an emergency. Puyallup School District has not had an adequate opportunity to prepare a detailed response given the lack of proper notice, and more importantly, given that it relied on the representation by Rainier View Water that the increase would only be in the 3% to 4% range.

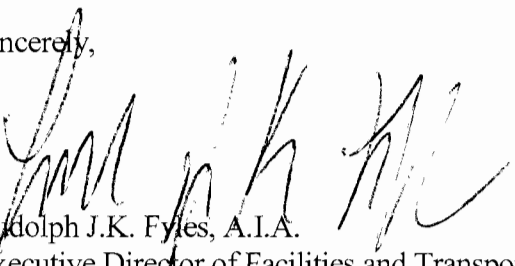
Moreover, Puyallup School District has not reviewed any materials justifying a single rate increase beyond what is being requested by all other water providers servicing Puyallup School District. The rate increases of the other water providers (as identified above) within Puyallup School District are consistent with Indexes which serve as the basis for measuring reasonable and equitable increases.

School Districts serve a unique and essential public service that must be recognized. School Districts serve not only the academic and physical educational needs of its students but the recreational needs of its community as well. This function is vital and an integral part of a healthy and sustainable community.

Thus, Puyallup School District respectfully requests that the Commission deny the proposed Rate Increase and Tariff Revision. Or, in the alternative, the District requests that the Commission suspend the Tariff Revision and order that a public hearing be held in order to present testimony on this critical proposed Rate Increase which will adversely impact Puyallup School District.

Thank you for your consideration.

Sincerely,



Rudolph J.K. Fyles, A.I.A.
Executive Director of Facilities and Transportation

cc: Dr. Tony Apostle, Superintendent, Puyallup School District
Debra Aungst, Deputy Superintendent, Puyallup School District
Leonard Cassman, Director of Maintenance, Puyallup School

**Puyallup School District
Carson Elementary School
Domestic and Irrigation
Proposed Tariff May 2010**

Month	Use*	Meter**	Water (Usage)	Metered Rate Service				Total Due Under May 2010 Proposed Rate Increase	Total Due Under Current Tariff	Additional Monthly Flat Rate		
				3" Meter Charge	0 - 9000 Cubic Ft @.85	9001 - 45,000 Cubic Ft @ 1.50	Over 45,000 Cubic Ft @2.15			Fireflow	Treatment Surcharge	Generator Surcharge
Aug - Sept-07	Dom & Irr	3882106	222,100	86.63	76.50	540.00	3,807.65	4,510.78	1,910.95	250.00	3.29	0.61
October-07	Dom & Irr	3882106	26,800	86.63	76.50	267.00	0.00	430.13	250.90	225.00	3.29	0.61
November-07	Dom & Irr	3882106	5,100	86.63	43.35	0.00	0.00	129.98	66.45	225.00	3.29	0.61
December-08	Dom & Irr	3882106	3,300	86.63	28.05	0.00	0.00	114.68	51.15	225.00	3.29	0.61
January-08	Dom & Irr	3882106	4,800	86.63	40.80	0.00	0.00	127.43	63.90	225.00	3.29	0.61
February-08	Dom & Irr	3882106	4,800	86.63	40.80	0.00	0.00	127.43	63.90	225.00	3.29	0.61
March-08	Dom & Irr	3882106	4,800	86.63	40.80	0.00	0.00	127.43	63.90	225.00	3.29	0.61
April-08	Dom & Irr	3882106	6,300	86.63	53.55	0.00	0.00	140.18	76.65	225.00	3.29	0.61
May-08	Dom & Irr	3882106	39,900	86.63	76.50	463.50	0.00	626.63	362.25	225.00	3.29	0.61
June-08	Dom & Irr	3882106	70,300	86.63	76.50	540.00	543.95	1,247.08	620.65	225.00	3.29	0.61
July-08	Dom & Irr	3882106	118,900	86.63	76.50	540.00	1,588.85	2,291.98	1,033.75	225.00	3.29	0.61
August-08	Dom & Irr	3882106	56,800	86.63	76.50	540.00	253.70	956.83	505.90	225.00	3.29	0.61
September-08	Dom & Irr	3882106	77,200	86.63	76.50	540.00	692.30	1,395.43	679.30	225.00	3.29	0.61
October-08	Dom & Irr	3882106	6,200	86.63	52.70	0.00	0.00	139.33	75.80	225.00	3.29	0.61
November-08	Dom & Irr	3882106	4,600	86.63	39.10	0.00	0.00	125.73	62.20	225.00	3.29	0.61
December-09	Dom & Irr	3882106	3,100	86.63	26.35	0.00	0.00	112.98	37.90	225.00	3.29	0.61
January-09	Dom & Irr	3882106	5,200	86.63	44.20	0.00	0.00	130.83	55.75	225.00	3.29	0.61
February-09	Dom & Irr	3882106	5,100	86.63	43.35	0.00	0.00	129.98	63.40	225.00	3.29	0.61
March-09	Dom & Irr	3882106	4,100	86.63	34.85	0.00	0.00	121.48	46.40	225.00	3.29	0.61
April-09	Dom & Irr	3882106	7,300	86.63	62.05	0.00	0.00	148.68	73.60	225.00	3.29	0.61
May-09	Dom & Irr	3882106	34,600	86.63	76.50	384.00	0.00	547.13	305.65	225.00	1.81	0.61
June-09	Dom & Irr	3882106	125,200	86.63	76.50	540.00	1,724.30	2,427.43	1,075.75	225.00	1.81	0.61
July-09	Dom & Irr	3882106	129,100	86.63	76.50	540.00	1,808.15	2,511.28	1,108.90	225.00	1.81	0.61
August-09	Dom & Irr	3882106	85,700	86.63	76.50	540.00	875.05	1,578.18	740.00	225.00	1.81	0.61
September-09	Dom & Irr	3882106	48,300	86.63	76.50	540.00	70.95	774.08	422.10	225.00	1.81	0.61
October-09	Dom & Irr	3882106	9,600	86.63	76.50	9.00	0.00	172.13	93.15	225.00	1.81	0.61
November-09	Dom & Irr	3882106	4,800	86.63	40.80	0.00	0.00	127.43	52.35	225.00	1.81	0.61
December-10	Dom & Irr	3882106	3,800	86.63	32.30	0.00	0.00	118.93	43.85	225.00	1.81	0.61
January-10	Dom & Irr	3882106	4,900	86.63	41.65	0.00	0.00	128.28	53.20	225.00	1.81	0.61
February-10	Dom & Irr	3882106	5,100	86.63	43.35	0.00	0.00	129.98	54.90	225.00	1.81	0.61
TOTAL			1,127,800	\$2,598.90	\$1,702.55	\$5,983.50	\$11,364.90	\$21,649.85	\$10,114.55	6,775.00	83.90	18.30
* Compound *Both Meters (3882106/3882106B) Included in Water Usage										TOTAL INCREASE - 114.04%		