

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter Complaint for Penalties  
Against:

SUNRISE ACRES WATER  
SERVICES, LLC

DOCKET UW-180886

DECLARATION OF  
SUSIE PAUL


Susie Paul, under penalty of perjury under the laws of the State of Washington, declares as follows:

1. I am employed by the Washington Utilities and Transportation Commission (commission) as a Compliance Investigator in the Consumer Protection Section. As a Compliance Investigator, my responsibilities include conducting investigations regarding the business practices of regulated utility and transportation companies.
2. I am familiar with Sunrise Acres Water Services, LLC (Sunrise Acres), as I was the assigned investigator in this same Docket in which the commission held a special proceeding to determine whether Sunrise Acres is subject to regulation under chapter 80.28 RCW. The special proceeding was held on February 4, 2019.
3. On March 6, 2019, Order 02 was issued which classified Sunrise Acres as a water company. Mr. Harrison, owner of Sunrise Acres, was ordered to either file a tariff with the commission as set out in WAC 480-110-433, or file a sale agreement documenting that he is no longer the owner of Sunrise Acres by April 8, 2019.
4. On April 11, 2019, the Assistant Attorney General, on behalf of staff, filed a letter to Mark L. Johnson, Executive Director and Secretary of the commission, notifying him that Sunrise Acres has not complied with Order 02 because it failed to submit a tariff as set out in WAC 480-110-433, or file a sale agreement documenting that Mr. Tom Harrison no longer owns Sunrise Acres.
5. On April 23, 2019, I contacted Mr. Harrison by telephone and inquired about the status of a tariff or sale agreement filed at the Commission. Mr. Harrison stated that "they" were out of town and as a result he could not file the sale agreement. I explained to Mr. Harrison that he is the current owner of Sunrise Acres and he would need to file a tariff in the absence of a sale agreement. I also explained the severity of

not complying with a Commission Order and that it may result in enforcement action, to include assessed penalties. Mr. Harrison said he would get to it next week.

6. Mr. Harrison has continuously failed to comply with staff requests and Commission Orders. Staff is recommending the commission take further action in the form of a penalty.

DATED this 10th day of May 2019, at Olympia, Washington.

  
SUSIE PAUL