

Exhibit No. ____ (TY-9)
Docket UW-101818
Witness: Travis Yonker

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

MARIA K. LINDBERG,

Respondent.

DOCKET UW-101818

EXHIBIT TO
DIRECT TESTIMONY OF
Travis Yonker
STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Staff Investigation Report

June 23, 2011

W A S H I N G T O N



UTILITIES AND TRANSPORTATION
COMMISSION

Investigation Report

Cristalina LLC

UW-101818

Travis Yonker
Compliance Investigations

March 2011

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PURPOSE, SCOPE, AND AUTHORITY

Purpose

The purpose of this investigation is to determine if Cristalina LLC (Cristalina) is in compliance with commission rules and the company's tariff.

Scope

The scope of the investigation includes Cristalina's business practices as reflected in both the commission's consumer complaints received since 2007, as well as data provided by Cristalina.

Authority

Staff undertakes this investigation pursuant to the authority granted by the Revised Code of Washington (RCW) 80.01.040, which directs the commission to regulate water companies in the public interest. In addition, RCW 80.04.070 grants the commission specific authority to conduct such an investigation.

EXECUTIVE SUMMARY

In consumer complaint 108411, originally filed in February 2010, Consumer Protection staff found that Cristalina LLC (Cristalina) violated numerous commission rules. As a result of that complaint, Compliance Investigations staff concluded that a broader investigation was necessary to determine if Cristalina was in compliance with commission rules and the company's tariff.

Staff reviewed records for all customers receiving service from Cristalina between June 2009 and October 2010, and all consumer complaints against Cristalina received by the commission. Staff's investigation into the business practices of Cristalina revealed that the company is in violation, as follows, of rules and laws enforced by the commission:

- Failure to provide customers with bills containing all required elements, in violation of WAC 480-110-375.
- Failure to respond timely to commission-referred complaints, in violation of WAC 480-110-385.
- Failure to bill customers according to the company's tariff, in violation of RCW 80.28.080.
- Failure to refrain from rate discrimination, in violation of RCW 80.28.100.
- Failure to comply with a commission order, in violation of RCW 80.04.380.

Recommendation

Due to the apparent lack of appropriate management of Cristalina's business practices, staff recommends the commission assess penalties against Maria Lindberg, owner and manager of Cristalina, under RCW 80.04.405, for those violations that have the most direct impact on individual customers. Staff recommends the following penalties:

- Cristalina's current bill form lacks two required elements in violation of WAC 480-110-375. These specific elements have previously been addressed by prior staff technical assistance. Staff recommends a penalty of \$100 per violation, for a total penalty of \$200.
- Cristalina failed to charge all but two customers the proper amount in August 2009 in violation of RCW 80.28.080. Staff recommends a penalty of \$100 for each of the 83 customers the company failed to properly charge in August 2009, for a total penalty of \$8,300.
- Cristalina failed to charge all customers the proper amount from December 2009 through September 2010 in violation of RCW 80.28.080. Staff recommends a penalty of \$100 for each of the 87 customers the company failed to properly charge during that time, for a total penalty of \$8,700.
- Cristalina failed to charge all customers equally by giving six individual customers discounts and credits, and settling one customer's account for less than the overdue amount, in violation of RCW 80.28.100. Staff recommends a penalty of \$100 per violation, for a total penalty of \$700.
- Cristalina failed to comply with commission Order 04, Docket UW-090839, by not filing temporary metered rates by September 1, 2010, in violation of RCW 80.04.380. Staff recommends a penalty of \$100 for failing to file temporary metered rates as ordered.

Staff recommends a total penalty of \$18,000. In addition, staff recommends Maria Lindberg attend a commission-hosted training session to review commission rules and the company's tariff and submit a written compliance plan to the commission addressing all violations. Finally, staff recommends Maria Lindberg closely review this report as it provides valuable technical assistance in other areas that need improvement.

BACKGROUND

Company Information

Cristalina is a Class C regulated water company serving 84 customers¹ in the Ravensdale area of eastern King County, Washington. According to the Washington Secretary of State's electronic records, Cristalina registered in Washington as a Limited Liability Company on May 8, 2000, with Maria Lindberg of Bellingham, Washington, listed as the only member of the company. According to tariff revision sheets filed with the commission by the company, Maria Lindberg is the "President/Manager" of the company. Further, according to the company's 2009 annual report, Maria Lindberg identified herself as "Owner/Manager." Recent annual reports filed with the commission by the company reflect the following annual gross revenue:

Report Year	Gross Revenue
2006	\$56,561.98
2007	\$51,797.17
2008	\$58,506.04
2009	\$56,113.53

A review of Cristalina's complaint history reveals six consumer complaints filed against the company between August 2007 and November 2010. Dispositions on the complaints indicate the company was upheld in only one complaint, while the complaining customer was upheld in three complaints.²

Technical Assistance

On September 21, 2007, a consumer filed a complaint with the commission against Cristalina (complaint 101638). At the conclusion of the complaint investigation, staff cited the company for 11 violations of WAC 480-110-385(3)(a) for failing to respond within two business days to a commission-referred complaint.

On June 25, 2010, following an investigation of a customer complaint filed with the commission against Cristalina (complaint 109093), staff cited the company for violation of commission rules as follows:

Violation	Number of Violations
WAC 480-110-385(3)(a): Failing to provide initial response within two business days	3
WAC 480-110-385(3)(b): Failing to keep the commission informed of progress of investigation	1
WAC 480-110-385(4): Failing to keep records	1

¹ Cristalina reported in its 2009 annual report that it served 84 customers. According to documents received from Cristalina, during the relevant review period of this investigation, the company had approximately 87 customers receiving services each month.

² As of the date of this report, two consumer complaints are pending final disposition.

On August 18, 2010, following an investigation of a customer complaint filed with the commission against Cristalina (complaint 108411), staff cited the company for violation of commission rules as follows:

Violation	Number of Violations
WAC 480-110-375(1)(c): Failing to show separate charges as separate line items on customer bills	12
WAC 480-110-375(1)(d): Failing to show correct late charge amount on customer bills	79
WAC 480-110-375(1)(f): Failing to give an adequate period of time before a bill becomes delinquent	79
WAC 480-110-375(1)(g): Failing to show the company's business address on customer bills	79
RCW 80.28.080: Failing to bill accurately	79
RCW 80.28.080: Failing to collect for usage	236
WAC 480-110-355(3)(a)(ii): Failing to provide all pertinent information relating to the reason for the disconnection on the disconnection notice	1
WAC 480-110-355(3)(a)(iii): Failing to list the company's contact information on the disconnection notice	1
WAC 480-110-355(3)(c)(i): Failing to provide all detailed information pertinent to the situation in the mailed disconnection notice	2
WAC 480-110-355(b)(i): Disconnecting a customer without properly notifying the customer	1
WAC 480-110-355(5)(c): Failing to offer a customer to pay a deposit to have service reconnected	1
WAC 480-110-345(2): Refusing service to a customer due to prior obligation	1

On August 19, 2010, staff contacted Terryl Cooper, bookkeeper for Cristalina, and the appointed company contact during that investigation. Regarding the violation of RCW 80.28.080, which involved billing customers at a different rate than set forth in Cristalina's tariff, staff identified to Ms. Cooper the monthly rates the company should charge according to the company's tariff. On September 14, 2010, staff received a response from Ms. Cooper that she had no information to explain the difference between the monthly rates charged to customers and the correct amount under the tariff.

Investigation

Staff initiated this investigation into Cristalina's business practices based on violations found during the investigation of complaint 108411, in which staff ultimately cited the company for 480 violations of commission rules.

INVESTIGATION

Data Request

On June 21, 2010, staff requested the following records from Maria Lindberg, Cristalina's manager:

1. A list of customers for whom Cristalina provides services.
2. For each customer, a document showing a complete statement of all debit and credit activity between June 1, 2009, through March 31, 2010.
3. Records of any payment arrangements made between Cristalina and any customers for payment of past due amounts.
4. The name, title, telephone number, and e-mail address of a contact person at the company with whom staff could communicate.

Staff requested Cristalina respond to the data request no later than July 14, 2010.³ On July 19, 2010, staff received a 40-page document entitled, "Customer Balance Detail," which describes the invoice and payment history for each customer for the period from June 1, 2009, through March 31, 2010. Staff also received a brief summary of the status of six accounts, and two letters from attorney Richard E. Jonson to individual customers describing specific payment arrangements. Terryl Cooper, bookkeeper, was identified as the contact person for the investigation.

On August 19, 2010, staff requested clarification from Cristalina regarding a number of issues found upon review of Cristalina's original response. On September 9, 2010, after receiving no response from Cristalina, staff contacted the company a second time. On September 14, 2010, staff received the requested clarification.

On November 12, 2010, staff requested additional billing history for the period April 1, 2010, through October 1, 2010. Staff also requested ten random recent billing statements. On that same date, staff received the requested information.

Staff used the documents and information furnished from the original data request, all subsequent responses from Cristalina, and commission records to conduct this investigation of Cristalina's business practices.

³ See Attachment 1 for a copy of the commission's data request.

FORM OF BILLS

Investigation

WAC 480-110-375 provides the requirements with which all water companies must comply in relation to the form of bills sent to all customers. Cristalina provided a total of ten examples of customer bills.⁴ Staff found that the company's current form of bills violates commission rules as follows:

- **Company business address:** WAC 480-110-375(1)(g) states that a water company must provide to each customer a bill that includes "the water company's name, business address, and telephone number and/or emergency telephone number by which a customer may contact the company." On each of the ten examples of billing invoices provided by the company, the only information provided is the company's name and mailing address. Thus, the current bill form does not comply with the rule as the company has failed to provide its business address or any telephone number.
- **Delinquent bill dates:** WAC 480-110-375(1)(f) states that bills must "[s]how the date the bill becomes delinquent if not paid." On each of the ten examples of bills provided by the company, there was no date specified by which the bill had to be paid. The only date included was the date of the bill.

Technical Assistance

Commission staff has provided Cristalina with technical assistance regarding its form of bills. In August 2010, consumer protection staff submitted to the company its findings after investigating a consumer complaint.⁵ Staff specifically addressed both the lack of company business address and the lack of a delinquent bill date in its findings at that time.

On September 21, 2010, Terryl Cooper, bookkeeper for Cristalina, contacted staff and stated that customer billing statements would include both the mailing address and physical address, and provided staff with a draft copy of the new billing statement format, which included the new additions. As such, the company understood the requirement to include a physical address in all customers' bills.

Findings

Staff finds that Cristalina has failed to provide a bill form in compliance with all aspects of WAC 480-110-375 by failing to include the company's business address and a telephone number, and by failing to include a date upon which the bill becomes delinquent.

Recommendations

Staff recommends a penalty of \$100 for each element of WAC 480-110-375 not present in the company's current bill form, for a total penalty of \$200.

⁴ See Attachment 2 for an example of the company's current billing form.

⁵ See Consumer Complaint 108411.

COMMISSION-REFERRED COMPLAINTS

Investigation

WAC 480-110-385(3)(a) requires water companies to respond to commission-referred complaints within two business days after commission staff refers a complaint to a company for investigation. WAC 480-110-385(3)(b) requires water companies to “[k]eep the commission consumer affairs staff informed of progress toward the solution and the final result.”

Staff found that Cristalina provided timely responses in only two complaints out of six total complaints between August 2007 and November 2010. Cristalina responded late in four complaints, for a total of 16 violations of WAC 480-110-385(3)(a). Additionally, in one complaint, Consumer Protection staff found one violation of WAC 480-110-385(3)(b) for failing to keep commission staff informed of the progress of the investigation after the company’s initial response.⁶

Findings

Staff finds that Cristalina failed to respond to commission-referred complaints within two business days as required under WAC 480-110-385(3)(a) in four instances.

Recommendations

Staff considers this investigation as the company’s technical assistance regarding response to commission-referred complaints. If future violations are found, staff may recommend penalties or take other enforcement action.

⁶ See Complaints 101406, 101638, 108411, 109093, summarized in Appendix A.

BILLED RATES

Investigation

RCW 80.28.080 requires that no water company “shall charge, demand, collect or receive a greater or less or different compensation for any service rendered or to be rendered than the rates and charges applicable to such service as specified in its schedule filed and in effect at the time.”

Staff found that Cristalina failed to comply with its tariff as follows:

- **August 2009 charge:** According to the records staff received from Cristalina, on August 1, 2009, the company charged all but two customers \$57 instead of \$77 as required by the company’s tariff.⁷ Staff requested additional information regarding the discrepancy. Terryl Cooper, bookkeeper for Cristalina, responded, “This was due to huge problems with the water service. It was a one-time credit to all customers.” While WAC 480-110-395 states that a water company “may be required to refund water charges due to poor water quality only,” such a refund may only occur following a “commission order resulting from a formal proceeding before the commission.” A review of commission records reveals no commission order that would have led to the August 2009 refund. As such, Cristalina was not authorized to deviate from the tariff rate of \$77. A total of 83 customers were charged the lower rate of \$57.
- **December 2009 through September 2010 charge:** According to the records staff received from Cristalina, on December 1, 2009, the company changed its monthly charge from \$77.00 to \$70.00. Staff requested additional information regarding the change and Ms. Cooper initially responded that this was due to a change in the company’s tariff. A review of the company’s tariff history reveals that the commission approved a tariff change to take effect March 1, 2010, that changed the monthly charge to \$68.30. As such, prior to March 1, 2010, all customers should have been charged \$77, and after that date, they should have been charged \$68.30 instead of \$70. When staff pointed this out to Ms. Cooper, and asked if there was any reason for Cristalina to change its rate in December 2009, Ms. Cooper responded, “I do not have any info regarding this.” All customers receiving service during this period were incorrectly charged \$70 each month for ten months until October 1, 2010, when the company began charging the proper amount of \$68.30.⁸

Technical Assistance

On March 11, 2010, Consumer Protection staff contacted the company and notified it that the company was not charging according to the company’s tariff. Maria Lindberg, owner of Cristalina, responded that the monthly charge to customers at that time was \$70. Consumer Protection staff responded to Ms. Lindberg’s statement by explaining that the proper monthly charge after March 1, 2010, was \$68.30. Despite this technical assistance, the company failed to charge the correct monthly amount until October 1, 2010.

⁷ The only two customers who were charged the correct rate of \$77 in August 2009 were customers Sapiieszko (1057) and Roach (1086).

⁸ See Appendix B for a table showing Cristalina customers and the incorrect amounts each were charged.

Findings

Staff finds that Cristalina failed to charge 83 customers correctly for the month of August 2009. Staff further finds that Cristalina failed to charge all 87 customers correctly from December 2009 through September 2010.

Recommendation

Staff recommends a penalty of \$100 for each customer incorrectly charged in August 2009 and for each customer incorrectly charged between December 2009 and September 2010, in violation of RCW 80.28.080, for a total penalty of \$17,000.

DISCOUNTS AND CREDITS TO CUSTOMERS

Investigation

RCW 80.28.100 states that no water company “shall, directly or indirectly, or by any special rate, rebate, drawback or other device or method, charge” a greater or lesser amount to one person than the amount charged to all other persons. Moreover, WAC 480-110-395 states that a water company “may be required to refund water charges due to poor water quality **only** (a) upon commission order resulting from a formal proceeding before the commission.”

Staff found that Cristalina provided discounts or credits to customers in the absence of a commission order as follows:

- On June 15, 2009, the company gave customer Kimmel a discount of \$15. Staff requested information from the company regarding this discount, however, the company was unable to provide any explanation for the discount.
- Between August 29 and 31, 2009, the company gave customer Bryan four discounts totaling \$8,157.16. The company indicated that the overdue amount was “written off.” Further requests from the company for additional information have gone unanswered.
- On September 7, 2009, the company gave customer Barmore a discount of \$100. Staff requested information from the company regarding this discount, however, the company was unable to provide any explanation for the discount.
- On October 23, 2009, the company gave customer Olson two discounts totaling \$5.31. Staff requested information from the company regarding this discount, however, the company was unable to provide any explanation for the discount.
- On January 13, 2010, the company gave customer Posey a credit memo of \$115. Staff requested information from the company regarding this discount, however, the company was unable to provide any explanation for the discount.
- On May 3, 2010, the company gave customer Cullinan a credit memo of \$57. Staff requested information from the company regarding this discount, however, the company was unable to provide any explanation for the discount.

Staff also found that Cristalina settled a customer account for less than the total originally charged as follows:

- On January 8, 2010, the company, through its attorney, Richard E. Jonson, offered to settle customer Van Kirk’s past due amount for \$4,500. On January 18, 2010, Ronald Van Kirk and Julie Van Kirk both signed the settlement offer. A review of the account history indicates that on January 29, 2010, a payment of \$4,500 was received by the company. While the account history continues to show the remaining overdue balance still owing, the signed settlement offer states that the \$4,500 payment would be “in full satisfaction of the overdue billing.”

Findings

Staff finds that Cristalina engaged in discriminatory rate charges in violation of RCW 80.28.100 when it gave discounts and credits to six customers without a commission order to do so, and

also when it agreed to settle one customer's account for less than the full charged amount. Staff finds seven violations of RCW 80.28.100.

Recommendation

Staff recommends a penalty of \$100 for each instance in which Cristalina charged a customer less than it charges other customers, for a total penalty of \$700.

COMPLIANCE WITH COMMISSION ORDERS

Investigation

RCW 80.04.380 requires that every public service company, including all water companies, “obey, observe and comply with every order, rule, direction or requirement made by the commission.”

On February 26, 2010, the commission ordered, in Order 03, Docket UW-090839, that Cristalina file temporary metered rates within 120 days of a construction project. The company reached substantial completion of the project on March 15, 2010, which required Cristalina to file temporary metered rates by July 15, 2010. On July 16, 2010, the company requested an extension until September 1, 2010, for filing its temporary metered rates. On July 29, 2010, the commission granted the company’s request in Order 04, Docket UW-090839.

According to commission records, on September 17, 2010, commission staff contacted Terryl Cooper, bookkeeper for Cristalina to learn the status of the company’s temporary metered rates filing that was past due. At that time Ms. Cooper stated that she had “no idea when they will file.” According to commission records, the company has never filed its temporary metered rates as ordered and the company has failed to formally request a further filing extension beyond September 1, 2010.

Findings

Staff finds that Cristalina failed to comply with the commission’s Order 04, Docket UW-090839, by failing to file its temporary metered rates with the commission by September 1, 2010.

Recommendation

Staff recommends a penalty of \$100 for failing to file its temporary metered rates in violation of RCW 80.04.380.

SUMMARY OF RECOMMENDATIONS

1. Staff recommends a total penalty of \$18,000 be imposed against Maria Lindberg, owner and manager of Cristalina, for the following violations:
 - Cristalina's current bill form lacks two required elements in violation of WAC 480-110-375. These specific elements have previously been addressed by prior staff technical assistance. Staff recommends a penalty of \$100 per violation, for a total penalty of \$200.
 - Cristalina failed to charge all but two customers the proper amount in August 2009 in violation of RCW 80.28.080. Staff recommends a penalty of \$100 for each of the 83 customers the company failed to properly charge in August 2009, for a total penalty of \$8,300.
 - Cristalina failed to charge all customers the proper amount from December 2009 through September 2010 in violation of RCW 80.28.080. Staff recommends a penalty of \$100 for each of the 87 customers the company failed to properly charge during that time, for a total penalty of \$8,700.
 - Cristalina failed to charge all customers equally by giving six individual customers discounts and credits, and settling one customer's account for less than the overdue amount, in violation of RCW 80.28.100. Staff recommends a penalty of \$100 per violation, for a total penalty of \$700.
 - Cristalina failed to comply with commission Order 04, Docket UW-090839, by not filing temporary metered rates by September 1, 2010, in violation of RCW 80.04.380. Staff recommends a penalty of \$100 for failing to file temporary metered rates as ordered.
2. Staff recommends Maria Lindberg attend a commission-hosted rule and tariff training and submit a written compliance plan to the commission addressing all violations.
3. Staff recommends Maria Lindberg closely review this report as it provides valuable technical assistance in other areas that need improvement. Staff has provided technical assistance in those areas within this report. If future violations are found in these areas, staff may recommend penalties or take other enforcement action.

APPENDIX A

Cristalina failed to respond in a timely manner in the following consumer complaints:

- **Complaint 101406:** On August 16, 2007, Consumer Protection staff forwarded a complaint to Cristalina, requesting a response. Due to commission inaccuracies in the contact information for Cristalina, the request was re-sent on September 6, 2007. On September 10, 2007, after receiving no response from the company, staff sent a second request to the company. On September 11, 2007, the company responded. While staff did not record a violation of WAC 480-110-385(3)(a), the company's response was one day late, and only came after staff made a second request to the company.
- **Complaint 101638:** On September 21, 2007, Consumer Protection staff forwarded a complaint to Cristalina, requesting a response. On October 10, 2007, after receiving no response from the company, staff sent a second request to the company. On October 11, 2007, the company responded, stating it had not received the complaint until the day before. Staff recorded 11 violations of WAC 480-110-385(3)(a).
- **Complaint 109093:** On June 8, 2010, Consumer Protection staff forwarded a complaint to Cristalina, requesting a response. On June 15, 2010, staff received the company's response three days late. Staff recorded three violations of WAC 480-110-385(3)(a).
- **Complaint 110058:** On November 2, 2010, Consumer Protection staff forwarded a complaint to Cristalina, requesting a response. On November 5, 2010, staff received the company's response one day late.

APPENDIX B

Billing totals by customer from December 2009 to September 2010

CUSTOMER	AMOUNT CHARGED	CORRECT AMOUNT	DIFFERENCE
1001-Post	\$700.00	\$709.10	(\$9.10)
1002-Euscher	\$700.00	\$709.10	(\$9.10)
1003-Philpat	\$700.00	\$709.10	(\$9.10)
1004-Almeida	\$700.00	\$709.10	(\$9.10)
1005-King	\$700.00	\$709.10	(\$9.10)
1006-Scott	\$700.00	\$709.10	(\$9.10)
1007-Butts	\$700.00	\$709.10	(\$9.10)
1008-Henderson	\$700.00	\$709.10	(\$9.10)
1009-Kelson	\$700.00	\$709.10	(\$9.10)
1010-Doyle	\$700.00	\$709.10	(\$9.10)
1011-Huff	\$700.00	\$709.10	(\$9.10)
1012-Van Kirk	\$700.00	\$709.10	(\$9.10)
1013-Fiorito	\$700.00	\$709.10	(\$9.10)
1014-Barmore	\$700.00	\$709.10	(\$9.10)
1016-Urick	\$700.00	\$709.10	(\$9.10)
1017-Caruso	\$700.00	\$709.10	(\$9.10)
1018-Mittendorf	\$700.00	\$709.10	(\$9.10)
1019-Rose	\$700.00	\$709.10	(\$9.10)
1020-Deckard	\$700.00	\$709.10	(\$9.10)
1021-Stone	\$700.00	\$709.10	(\$9.10)
1022-McMurray	\$700.00	\$709.10	(\$9.10)
1023-Larson	\$700.00	\$709.10	(\$9.10)
1024-Roddick	\$700.00	\$709.10	(\$9.10)
1025-Jacobs	\$700.00	\$709.10	(\$9.10)
1026-Nass	\$700.00	\$709.10	(\$9.10)
1027-Bohlander	\$700.00	\$709.10	(\$9.10)

CUSTOMER	AMOUNT CHARGED	CORRECT AMOUNT	DIFFERENCE
1029-Compton	\$700.00	\$709.10	(\$9.10)
1030-Graham	\$700.00	\$709.10	(\$9.10)
1031-McGuire	\$700.00	\$709.10	(\$9.10)
1032-Gunn	\$700.00	\$709.10	(\$9.10)
1033-Jense	\$700.00	\$709.10	(\$9.10)
1034-Kester	\$700.00	\$709.10	(\$9.10)
1035-Cinnamon	\$700.00	\$709.10	(\$9.10)
1036-Bonson	\$700.00	\$709.10	(\$9.10)
1037-Litras	\$700.00	\$709.10	(\$9.10)
1038-Llapitan	\$700.00	\$709.10	(\$9.10)
1038-Padgett	\$700.00	\$709.10	(\$9.10)
1039-Belcher	\$700.00	\$709.10	(\$9.10)
1040-Toppen	\$700.00	\$709.10	(\$9.10)
1041-Gott	\$700.00	\$709.10	(\$9.10)
1042-Arden	\$700.00	\$709.10	(\$9.10)
1043-Thornton	\$700.00	\$709.10	(\$9.10)
1044-Mersman	\$630.00	\$632.10	(\$2.10)
1045-Palazzo	\$70.00	\$77.00	(\$7.00)
1046-Nash	\$700.00	\$709.10	(\$9.10)
1047-Dillard	\$700.00	\$709.10	(\$9.10)
1048-England	\$700.00	\$709.10	(\$9.10)
1049-Olson	\$700.00	\$709.10	(\$9.10)
1050-Funkhouser	\$700.00	\$709.10	(\$9.10)
1051-Blankinship	\$700.00	\$709.10	(\$9.10)
1052-Keeney	\$700.00	\$709.10	(\$9.10)
1053-Seligman	\$700.00	\$709.10	(\$9.10)
1054-Thomas	\$700.00	\$709.10	(\$9.10)
1055-Duran	\$700.00	\$709.10	(\$9.10)
1056-Beck	\$700.00	\$709.10	(\$9.10)
1057-Merrick	\$700.00	\$709.10	(\$9.10)
1057-Sapiesko	\$700.00	\$709.10	(\$9.10)
1058-McGuire	\$700.00	\$709.10	(\$9.10)

CUSTOMER	AMOUNT CHARGED	CORRECT AMOUNT	DIFFERENCE
1059-Daniels	\$700.00	\$709.10	(\$9.10)
1060-Batzelle	\$700.00	\$709.10	(\$9.10)
1061-Cullinan	\$700.00	\$709.10	(\$9.10)
1062-Lindberg	\$700.00	\$709.10	(\$9.10)
1063-McKee	\$700.00	\$709.10	(\$9.10)
1064-White	\$700.00	\$709.10	(\$9.10)
1065-Greene	\$700.00	\$709.10	(\$9.10)
1066-Bennett	\$700.00	\$709.10	(\$9.10)
1067-Lushenko	\$700.00	\$709.10	(\$9.10)
1068-Wyatt	\$700.00	\$709.10	(\$9.10)
1069-Debruler	\$700.00	\$709.10	(\$9.10)
1070-Hawkins	\$700.00	\$709.10	(\$9.10)
1071-Myers	\$700.00	\$709.10	(\$9.10)
1072-Hankins	\$700.00	\$709.10	(\$9.10)
1073-Gregory	\$700.00	\$709.10	(\$9.10)
1074-Posey	\$700.00	\$709.10	(\$9.10)
1075-Palazzo	\$700.00	\$709.10	(\$9.10)
1076-Bertash	\$700.00	\$709.10	(\$9.10)
1077-Bennett	\$700.00	\$709.10	(\$9.10)
1078-Goodrich	\$700.00	\$709.10	(\$9.10)
1079-Nance	\$700.00	\$709.10	(\$9.10)
1080-Michael	\$700.00	\$709.10	(\$9.10)
1081-Park	\$700.00	\$709.10	(\$9.10)
1082-Aaker	\$700.00	\$709.10	(\$9.10)
1083-Baxter	\$700.00	\$709.10	(\$9.10)
1084-Lytle	\$700.00	\$709.10	(\$9.10)
1085-Boyles	\$700.00	\$709.10	(\$9.10)
1086-Roach	\$700.00	\$709.10	(\$9.10)

Attachment 1

June 21, 2010

Maria Lindberg, Manager
Cristalina, L.L.C.
P.O. Box 2626
Bellingham, WA 92268

RE: Data Request

Dear Ms. Lindberg:

Under Washington State law (Revised Code of Washington 80.04.070), the Utilities and Transportation Commission (commission) has the right to inspect the accounts, books, papers and documents of any public service company doing business in this state.

As part of a review of your water company, the commission requires Cristalina, L.L.C. (Cristalina) provide the following information and documents:

1. A list of customers for whom Cristalina currently provides utility services.
2. For each customer listed for Request Number One, provide a document or worksheet that shows the complete statement of all debit and all credit activity for the period of June 1, 2009, through March 31, 2010. This includes, but is not limited to, late fees, current charges, pledges, payments, reconnect fees, disconnect fees, account notes, and the balances owing after each application. Please separate the account histories by account number or address, if different.
3. Records of any payment arrangements made between Cristalina and any of its customers for payment of past due amounts. Such records must include the details of any payment arrangements and any amount forgiven by Cristalina, details of amounts designated as prior obligation, and details of amounts sent to collections.
4. The name, title, telephone number, and e-mail address of a contact person with whom our staff can work directly for questions that may arise concerning any details of the data.

You are required to furnish the above requested documents to commission staff by no later than 5:00 p.m. on July 14, 2010. Please attach a copy of this letter to the documents for reference.

Cristalina, L.L.C.
June 21, 2010
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If you have any questions regarding this request, you may contact Travis Yonker, Compliance Investigator. Mr. Yonker can be reached at (360) 664-1224 or at tyonker@utc.wa.gov.

Sincerely,

David W. Danner
Executive Director and Secretary

