

1
2
3
4
5
6
7 **BEFORE THE WASHINGTON STATE**
8 **UTILITIES AND TRANSPORTATION COMMISSION**

9 IN RE:

10 PETITION OF ROCHE HARBOR WATER
11 SYSTEM FOR WAIVER OF
12 WAC 480-07-505 AND WAC 480-07-530

DOCKET NO. UW-_____

ROCHE HARBOR WATER SYSTEM
PETITION FOR WAIVER OF FILING
REQUIREMENTS

13 The Roche Harbor Water System ("Company") hereby respectfully submits this Petition for
14 Waiver of WAC 480-07-505 and WAC 480-07-530. In the cover letter that accompanied the
15 Company's filing of the Fourth Revised Sheet No. 2 and Fourth Revised Sheet No. W-2 on April
16 30, 2009, the Company requested a waiver of any filing requirements that were not met by the filing
17 on April 30, 2009. This Petition will more formally petition for that requested waiver.

18 The purpose of the filing made on April 30, 2009, is to recover costs for the replacement of
19 activated carbon that will be included as an integral component of the Company's new treatment
20 facilities for disinfection byproducts.

21 The disinfection byproducts result from chlorination of the water. Under certain conditions,
22 chlorination can produce trihalomethanes and haloacetic acids. In the Company's instance, the
23 production of these disinfection byproducts exceeds the maximum contaminant level established by
24 the Environmental Protection Agency. Thus, treatment is necessary.

25
26 ROCHE HARBOR WATER SYSTEM
PETITION FOR WAIVER OF FILING
REQUIREMENTS - 1

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd SW
Olympia, WA 98512
(360) 956-7001

1 The activated carbon is used during the treatment process and dissipates over time. Thus, it
2 is required that the carbon be replaced on an annual basis.

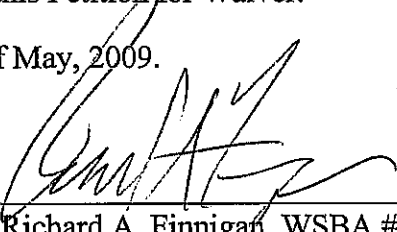
3 Work papers that accompanied the April 30, 2009, filing support the conclusion that the
4 anticipated replacement costs for the carbon is approximately \$36,000 a year. The filing is designed
5 to produce that amount of revenue and the revenue will be used only for the purpose of carbon
6 replacement. The revenue will not be used for the general revenue requirements of the Company.

7 Because of the nature of the filing made on April 30, 2009, it does not appear appropriate to
8 require the Company to proceed as though it were seeking an overall increase in revenue to cover
9 the general revenue requirements of the Company. To this end, the Company hereby respectfully
10 requests that the Commission grant a waiver of WAC 480-07-505 so that the April 30, 2009, filing
11 is not treated as a general rate proceeding. Further, the Company respectfully requests the waiver of
12 the requirements for the matters that are listed under WAC 480-07-530 that are to accompany a
13 general rate filing.

14 Please note that a customer notice has been sent to the customers and filed with the Record
15 Center. Please further note that a work paper specifically targeted at the cost of carbon replacement
16 did accompany the April 30, 2009, filing.

17 Thank you for your consideration of this Petition for Waiver.

18 Respectfully submitted this 1st day of May, 2009.

19
20 
21 _____
22 Richard A. Finnigan, WSBA #6443
23 Attorney for Roche Harbor Water System
24
25