



Investigation Report

Harrison-Ray Water Company, Inc. Harrison Water Company/Kiona, LLC

UW-180885

UW-190311

**Susie Paul
Compliance Investigations**

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PURPOSE, SCOPE, AND AUTHORITY

Purpose

The purpose of this investigation is to determine whether Harrison-Ray Water Company, Inc., and Harrison Water Company/Kiona, LLC, (collectively Harrison or Company) are in compliance with commission laws and rules outlined in Washington Administrative Code (WAC) 480-110 and Revised Code of Washington (RCW) 80.28.

Scope

The scope of this investigation focuses on Harrison's business practices as reflected in consumer complaints filed with the commission between Aug. 3, 2017, and Feb. 20, 2018, and documents provided by Harrison in response to staff's data request.

Authority

Staff undertakes this investigation pursuant to RCW 80.04.070, which grants the commission specific authority to conduct such an investigation.

Staff

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EXECUTIVE SUMMARY

As a result of numerous informal complaints filed at the commission against Harrison-Ray Water Company, Inc., and Harrison Water Company/Kiona, LLC, in 2017 and continuing in 2018, staff determined an investigation was necessary to determine whether Harrison is in compliance with state laws and rules administered by the commission. Staff reviewed 22 informal complaints received by the commission between Aug. 3, 2017, and Feb. 20, 2018. From the informal complaints and as a result of this investigation, staff documented a total of 1,486 violations. Staff found Harrison violated the following state laws and rules:

- RCW 80.28.080, Published rates to be charged
- WAC 480-110-315(1)(2)(4)(5)(6), Availability of information
- WAC 480-110-325(1), Application for service
- WAC 480-110-355(3)(a), Discontinuing of Service
- WAC 480-110-375(1)(a)(e)(f)(h)(4), Form of bills
- WAC 480-110-385(1)(a)(b)(c)(3)(a)(b), Water company responsibility for complaints and disputes
- WAC 480-110-485(1), Retaining and preserving records and reports

Penalty Recommendation – Harrison-Ray Water Company, Inc.

While the law allows the commission to assess a penalty of up to \$1,000 per violation, staff believes the full penalty would be overly burdensome based on the Company's reported revenue. The recommended penalty provides a significant incentive to avoid repeat violations. Staff recommends the commission issue a formal complaint against Harrison-Ray Water Company, Inc., and assess a penalty of up to \$46,100 for 915 violations of state laws and rules, as follows:

- Up to \$19,000 for 19 violations of RCW 80.28.080, for failing to charge customers the rates published in its tariff.
- Up to \$2,530 for 253 violations of WAC 480-110-315(1)(2)(4)(5)(6) for failure to provide customers a 24-hour emergency telephone number, notify the commission of changes to its contact information, failure to return customer's non-emergency call, failure to acknowledge customer's written inquiry, and failure to provide customers with a copy of the commission's consumer brochure.
- Up to \$1,000 for 266 violations of WAC 480-110-325(1) for failure to provide a customer with an application for service.
- Up to \$1,000 for 1 violation of WAC 480-110-355(3) for failure to properly provide the required notice prior to disconnect of service.
- Up to \$19,000 for 19 violations of WAC 480-110-375(1)(a)(e)(f)(h)(4) for failure to issue bills according to the rule; failure to provide enough information on bills for customers to calculate rates; failure to have a bill due date fifteen days after the mail date; failure to record accurate meter read date; and failure to allow customer payment arrangements equal to number of months back-billed.
- Up to \$3,570 for 357 violations of WAC 480-110-385(1)(a)(b)(c)(3)(a)(b) for failure to acknowledge complaints regarding requests for service, failure to investigate customer complaints, failure to timely investigate and report results of informal complaints to staff;

and failure to keep commission staff informed of progress toward the solution and final result of the investigation.

Penalty Recommendation – Harrison Water Company/Kiona, LLC

Staff recommends the commission issue a formal complaint against Harrison Water Company/Kiona, LLC, and assess a penalty of up to \$30,460 for 571 violations of commission laws and rules, as follows:

- Up to \$8,000 for eight violations of RCW 80.28.080, for failing to charge customers published rates for non-sufficient funds.
- Up to \$2,210 for 221 violations of WAC 480-110-315(1)(2)(4)(5)(6) for failure to provide customers a 24-hour emergency telephone number, notify the commission of changes to its contact information, failure to return customer's non-emergency call, failure to acknowledge customer's written inquiry, and failure to provide customers with a copy of the commission's consumer brochure.
- Up to \$1,000 for one violation of WAC 480-110-325(1) for failure to provide a customer with an application for service.
- Up to \$1,000 for one violation of WAC 480-110-355(1) for failure to properly provide the required notice prior to disconnect of service.
- Up to \$14,000 for 14 violations of WAC 480-110-375(1)(a)(h)(4) for failure to issue bills according to the rule; failure to provide enough information on bills for customers to calculate rates; failure to have a bill due date fifteen days after the mail date; failure to record accurate meter read date; and failure to allow customer payment arrangements equal to number of months back-billed.
- Up to \$3,250 for 325 violations of WAC 480-110-385(3)(a)(b) for failure to acknowledge complaints regarding requests for service, failure to investigate customer complaints, failure to timely investigate and report results of informal complaints to staff; and failure to keep commission staff informed of progress toward the solution and final result of the investigation.
- Up to \$1,000 for one violation of WAC 480-110-485 for failure to maintain records.

BACKGROUND

Harrison-Ray Water Company, Inc.

Washington Secretary of State (SOS) records indicate Harrison-Ray Water Company, Inc., is a for profit business that incorporated on March 5, 1979. The owners were listed as Tom and Dacia Harrison. The corporation was administratively dissolved on Aug. 1, 2017, for failure to file the required reports. The corporation was reinstated by the SOS on Sept. 12, 2018, and currently lists Tom Harrison as the recorded governor and registered agent.¹ The water system serves residential customers in the Pasco/Burbank, Washington area, located in Walla Walla County.

According to Washington Department of Health (DOH) records, there are 212 active connections with 223 approved connections. Tom Harrison is the recorded manager.² DOH records reflect an effective date for the water system as Jan. 1, 1970. The corporation has an active account with Washington Department of Revenue (DOR) and lists Tom Harrison as the governing person. The Company filed a tariff with the commission on Sept. 1, 2007, and the tariff became effective on Feb. 1, 2008. Documentation received from Harrison indicates it has 242 customers.

Harrison Water Company/Kiona, LLC

According to SOS records, Harrison Water Company/Kiona, LLC, is a limited liability company that was administratively dissolved on Aug. 1, 2017, for failure to file the required reports. The owners were listed as Tom and Dacia Harrison. The Company was reinstated by SOS on Sept. 11, 2018, and currently lists Tom Harrison as the recorded governor and registered agent.³ A search on DOR's website shows the Company as an active limited liability company, first licensed on June 10, 2015, and managed by W.T. Harrison Bypass Trust A.

DOH records indicate that the Company has approximately 221 active connections with 360 approved connections.⁴ The Company's tariff filed at the commission was made effective Feb. 1, 2008. Documentation received from Harrison indicates it has 213 customers.

Recent annual reports filed by Harrison reflect the following gross revenues:

Harrison-Ray Water Company			
Annual Report Year	Date Filed	Gross Operating Revenue	Utility Operating Loss
2015	May 2, 2016	\$151,225	-\$48,860
2016	May 8, 2017	\$132,781	-\$39,329
2017	May 2, 2018	\$136,534	\$4,428

¹ See Attachment A for a copy of Secretary of State record, printed on Oct. 25, 2018.

² See Attachment B for a copy of Dept. of Health record, printed on Oct. 25, 2018.

³ See Attachment C for a copy of Secretary of State record, printed on Oct. 25, 2018.

⁴ See Attachment D for a copy of Dept. of Health record, printed on Oct. 25, 2018.

Harrison Water Company/Kiona

Annual Report Year	Date Filed	Gross Operating Revenue	Utility Operating Loss
2015	May 2, 2016	\$140,027	-\$32,761
2016	May 8, 2017	\$126,999	-\$32,653
2017	May 2, 2018	\$146,280	\$45,313

INVESTIGATION

Data Request

On Feb. 21, 2018, staff requested the following information and documents from Harrison. The Company was requested to provide all information and documents by 5 p.m., March 7, 2018. Harrison requested and was granted an extension until March 8, 2018.⁵

Following is the requested documents and the responses by Harrison:

1. A list of all Washington state customers for whom you currently provide utility services, separated by individual company.

On March 8, 2018, the Company faxed two separate lists of customers (Harrison-Ray and Harrison Water); however the companies were not identified individually; they were both identified as Harrison-Ray Water Company. The Company's fax identified itself as Harrison Group.

Staff was able to differentiate the two companies by customer account numbers. The 213 customers with account numbers beginning with "1" are serviced by Harrison-Ray Water Company, Inc. The 242 customers with account numbers beginning with "2" are serviced by Harrison Water Company/Kiona, LLC.

After numerous attempts to obtain requested records from the Harrisons, staff received a voice message from Mr. Harrison on Sept. 6, 2018, which stated:

"I'm going to end up transferring everything over to my CPA and have her do the majority of the returns, calls for, you know, all the deals because Dacia just can't get to it; she's not capable."

2. For each account or service address listed in the table below, please provide a copy of all billing statements for the period of Aug. 1, 2017, through Jan. 31, 2018. Please include the date each billing statement was mailed. NOTE: The Account No. has been replaced with identification of Customers A through V.⁶

⁵ See Attachment E for a copy of Feb. 21, 2018, data request.

⁶ See Attachment F for consumer complaint summaries. Note: The violations in the complaint summaries

	Account No.	Service Address	City
1.	Customer A		Burbank, WA 99323
2.	Customer B	Teri Rd	Burbank, WA 99323
3.	Customer C		Burbank, WA 99323
4.	Customer D		Burbank, WA 99323
5.	Customer E		Burbank, WA 99323
6.	Customer F		Burbank, WA 99323
7.	Customer G		Burbank, WA 99323
8.	Customer H		Burbank, WA 99323
9.	Customer I	Largent Road	Burbank, WA 99323
10.	Customer J		Burbank, WA 99323
11.	Customer K	Piper Road	Burbank, WA 99323
12.	Customer L		Burbank, WA 99323
13.	Customer M		Benton City, WA 99320
14.	Customer N	Kim Lane	Benton City, WA 99320
15.	Customer O		Benton City, WA 99320
16.	Customer P	N. Hummingbird PRNE	Benton City, WA 99320
17.	Customer Q		Benton City, WA 99320
18.	Customer R		Benton City, WA 99320
19.	Customer S	N. Redstone	Benton City, WA 99320
20.	Customer T		Benton City, WA 99320
21.	Customer U		Benton City, WA 99320
22.	Customer V		Benton City, WA 99320

On March 8, 2018, Harrison faxed copies for 15 of the 22 billing statements requested. On March 12, 2018, Harrison sent an email to staff that stated:

I was reviewing my fax I'm sure you didn't receive all of it 92 pages and I have 132. I will call you tomorrow and see what you didn't get.

The Company did not follow through with a telephone call. On March 23, 2018, staff attempted to contact the Company and left a voicemail stating the remaining documents had not been received and asked for a return telephone call. As of the date of this report, the requested documents have not been submitted to staff.

- 3. For each customer who has received a disconnect notice for the period of Aug. 1, 2017, through Jan. 31, 2018, please provide a copy of the notice, the date the customer was notified, any associated fees, and all account notes and balances owed.**

reflect violations recorded in the informal complaints and may differ from the violations recorded in this investigation report.

The Company did not respond appropriately for this request. On March 8, 2018, the Company wrote in an email:

We attempted to deliver shut off notices and where (sic) told by your people that our notice was out dated. So all the notices that were given out had no action taken on them. I am now waiting for this review so we can make sure that our notices are good. So we may collect the money that is owing without being in trouble. If you could please let me know when we can do the notices it would be greatly appreciated. We could sincerely use the money to pay the bills that the water companies generate instead of spending our retirement money.

Also attached in the fax is our new water notices, hope they are alright so I may go ahead and collect the money that is out. (sic)

Although the Company alludes to the fact that it sent out notices, it failed to provide commission staff with a list of which customers received a disconnect notice, the date the customer was notified, any associated fees, or any customer account notes and balances owed. The Company did state that no action had been taken against the customers who had received disconnect notices.

4. An example of your companies' first and second written notices of disconnection for the period of Aug. 1, 2017, through Jan. 21, 2018.

On March 8, 2018, Harrison faxed what it calls its "termination notice."⁷ The coversheet for the faxed report states:

If you need anything else let me know, did the best I could. I ready (sic) do want to get all this taken care of but I am so overwhelmed right now it isn't even funny. So please help me get it all taken care so I can move forward.

5. A copy of the Company's customer complaint record for the period of Aug. 1, 2017, through Jan. 21, 2018, include the complainant's name and address, date and nature of the complaint, action taken, and the final result.

On March 8, 2018, Harrison responded to staff:

I wasn't aware that I was to keep a log on the complaints. So here is the list, you can see we don't get complaints till this lately regarding people not getting billings.⁸ Which we were no (sic) aware until people weren't paying. Then I started getting phone calls, then all the UTC complaints I have a bunch sorry I am trying to get them taken care of. I faxed the list to you also. My new machine and I haven't worked out all the kinks but I'm getting there. At lease I have hope

⁷ See Attachment G for a copy of the Company's disconnection notice.

⁸ See Attachment H for a redacted copy of the Company's complaint log.

again that having the resources I need to do my job better.

Harrison admits it has not kept records of customer complaints, but did provide a list of complaints. The Company indicates that two customer complaints on the list are closed but there is no record of what the complaint was about, the address of the complainant, or how the complaint was resolved.

Included with the list of customers who have complained to the Company, Harrison wrote:

ALL ARE COMPLAINTS ABOUT NO GETTING THEIR BILLS THIS HAS NEVER HAPPEN TO US AS YOU CAN SEE I AM OVERWELMED NEED HELP. WE DID MAIL BILLINGS SO WE ARE AT A LOSS YOU CAN SEE BY LOOKING IN YOUR RECORDS THAT WE NEVER HAVE PROBLEMS. BEEN THE LAST 5 OR 6 MONTHS MY HUSBAND MAELS THE BILLS AT THE SAME POST OFFICE IN PASCO. PEOPLE THAT HAVE BEEN WITH US FOR ALONG TIME KNOW THIS DOESN'T HAPPEN. WE FOUND OUR WHEN WE DECIDED TO DO SHUT OFFS CAUSE WE WERENT RECV ANY CHECKS.

6. The name, title, telephone, and email address of the contact person whom our staff can work with directly for questions that may arise concerning any details of the information provided.

Below is the March 8, 2018, response:

6. Tom and Dacia Harrison owners Tom phone is (509)727-2104 and mine is (509)727-2105 those are our cell phone of course business line is (509)545-1908 with charter we are in the process of changing phone service also down more than it works.

COMMISSION-ISSUED NOTICE TO COMPANY

On Feb. 28, 2018, the commission issued a Notice of Commission Staff Investigation, Suspension of Commission Decision on Formal Complaints, and Prohibition on Adverse Company Action Against Customers.⁹

The commission received communication from 23 customers of Harrison Water Company/Kiona, LLC, or Harrison-Ray Water Company, Inc., complaining about the timeliness and accuracy of the Company's billing statements. The commission's consumer protection staff attempted to investigate these complaints informally, but were unable to obtain sufficient information or cooperation from Harrison to resolve the customers' issues with the Company.

Nine of those customers subsequently filed formal complaints with the commission against the Company. The commission docketed and served these complaints on Harrison on Jan. 25, 2018. The Company failed to respond to the complaints within the 20 days as required under WAC 480-07-370(2).

⁹ See Dockets UW-180081 and UW-180144 through 180151.

Harrison was notified that it may not initiate service disconnection or disruption or take any other adverse actions against any of the customers who have lodged complaints with the commission.

Technical Assistance

Harrison's continued refusal, or inability, to respond to customers and staff alike, along with Harrison's multiple claims of being overwhelmed, prompted commission staff to arrange to meet Mr. and Ms. Harrison at their place of business in Richland, Washington, to provide technical assistance.

On April 9 and 10, 2018, Staff Investigator Sheri Hoyt and Staff Regulatory Analyst Jim Ward met with Tom and Dacia Harrison, owners of Harrison-Ray Water Company, Inc., and Harrison Water Company/Kiona, LLC.

The purpose of the visit was to collect responsive documents to the open informal complaints and to provide technical assistance related to WAC 480-110. The Harrisons were provided with a copy of the commission's water industry training presentation along with WAC 480-110. Staff provided the Company technical assistance in the following areas:

- WAC 480-110-315, Availability of information
 - Staff discussed the availability of information to its customers with the Company. The Company was unaware of its requirement to provide new customers with the commission's "Guide to Utility Services," (Consumer Guide) and, in fact, was not providing customers a yearly notice on the availability of the Consumer Guide. On April 23, 2018, staff followed up with the Company by email, providing a link to the specific WAC, the commission's website, and a link specifically to the Guide.¹⁰
- WAC 480-110-325, Application for Service
 - Staff and the Company discussed specific informal complaints filed with the commission related to applications for service. One customer reported he had attempted to get service in his name 15 times.¹¹ The Company was able to provide staff with a copy of an application. The rule was discussed and Ms. Harrison stated she understood.
- WAC 480-110-345(2), Refusal of service
 - Staff provided the Company technical assistance related to prior obligation and explained it cannot require a customer pay a delinquent balance to be

¹⁰ See Attachment I for a copy of staff's email, dated April 23, 2018.

¹¹ A Summary of CAS-22725-Z7K9P is available on request.

reconnected. Ms. Harrison said she was unaware of this rule. Staff went over the rule with Ms. Harrison, who highlighted the pertinent section.

- WAC 480-110-355, Disconnection of Service
 - Staff reviewed the Company's notice that states that service will be disconnected on the "8th day following this notice." The rule requires a customer be allowed eight business days from the date of mailing or the date of personal delivery. Staff advised the Company to include the specific due date the bill must be paid on the notice. Staff stressed that the customer has eight business days from the date of the notice to pay a delinquent bill, and that the Company is not allowed to disconnect service on the eighth day. Further, staff explained the notice becomes void after ten business days of the "pay by" date if the customer and the Company have not entered into a payment arrangement, extended the due date, or if the Company does not disconnect service. Ms. Harrison reviewed the disconnection rule with staff and said she understood the rule.
 - The Company claimed to be unaware of the requirement to provide customers two notices prior to a service disconnection. Staff advised Ms. Harrison that the Company may use the same notice for the first and second notice as long as the date on the second notice reflects the date the notice is left at the customer's residence, and that the notice includes the date by which payment must be made. Ms. Harrison said that she understood the rule.

- WAC 480-110-375, Form of bills
 - Numerous complaints were filed at the commission because customers were not receiving bills for service for months at a time. It was explained to the Harrisons that bills for service must be issued at intervals not to exceed three months. The Harrisons' tariffs require the Company to bill customers monthly.
 - Staff also provided technical assistance regarding the dates the Company reads the meters. Ms. Harrison acknowledged the meters are read approximately the first week of each month, or sometimes even before the end of the month. The billing postcards sent to customers state the billing cycle is a calendar month, *e.g.*, March 1 – March 31, no matter what date the meter is actually read. Ms. Harrison indicated all bills are mailed by the 15th day of the month so that customers have 15 days from the mailing date to the due date, which is the last day of the month. The rule states if a customer is metered, the Company must include the current and previous meter readings, the current read date, and the number and kind of units consumed.
 - Staff discussed payment arrangements on the accounts of customers who have not paid because they did not receive bills. It was explained that, technically, payment arrangements are required only for those customers who were not mailed a bill.

Staff recommended the Company send a confirmation letter with a payment arrangement to each customer who requests one, so there is clarity for both the customer and the Company.

- WAC 480-110-385, Water company responsibility for complaints and disputes.
 - During the technical assistance visit, the Company was able to provide staff with a customer history for each requested account, but the Company does not note any interactions the Company may have with customers. When customers call the Company regarding a billing issue, the Company creates a handwritten note; however, the notes staff reviewed did not appear to be substantive nor were they transferred to the customers' electronic accounts.

- WAC 480-110-485, Retaining and preserving records.
 - In an attempt to resolve a customer complaint, Staff requested Ms. Harrison search for two \$75 payments that the customer said were not credited to his account.¹² Ms. Harrison searched the photocopies and found a copy of a check for one of the missing \$75 payments, which she entered in the customer's electronic account. Ms. Harrison was not able to locate the other \$75 payment that was alleged to be missing and stated the customer will need to provide the check number, the amount, and the date the check was cashed and she would get it posted to the customer's account. Staff discussed with the Company about customers' payments being applied to the wrong account and the Company stated that the CPA would find the errors, but could not explain how the CPA would be able to find the errors. Staff discussed retaining and preserving records with the Company.

At the end of the April 9 and 10, 2018, technical assistance visit, staff provided the Company with a copy of commission staff's Water Training presentation and advised it be read and to contact staff with any questions.

Investigation Report Format

Due to the complexity of investigating two separate companies owned by Tom Harrison and reviewing 22 informal complaints, as well as for the ease of the reader, this report is divided into separate sections for each of the two water companies.

During staff's investigation, it became evident that the companies are not run as separate companies and the owners have, at times, billed customers from the wrong companies, *e.g.*, a Harrison-Ray Water Company, Inc., customer received a bill from Sunrise Acres (a company

¹² A Summary of CAS-22812-H7H1V8 is available on request.

owned by Harrison but not regulated by the Commission at the time).¹³ Harrison refers to itself as “Harrison Group” on faxes sent to the commission.

Harrison’s failure to respond to staff and customers is a recurring theme in each complaint. Staff has attempted to condense this report by attaching a summary of the complaints, the customer’s basic issue, the result, and the violations recorded. The violations for each complaint are recorded in this report.

HARRISON-RAY WATER COMPANY, INC.

Published Rates to be Charged

Investigation

RCW 80.28.080 states in part that the company must bill customers according to the company’s tariff.

On Oct. 4, 2018, staff requested Harrison respond to the following documentation related to rates:

1. A list of all customers (by individual company) for the period of Nov. 1, 2016, to present who have been charged a NSF fee, and the amount charged.
2. A list of all customers (by individual company) for the period of Nov. 1, 2016, to present who have been charged a reconnect fee, and the amount charged.
3. A list of all customers (by individual company) for the period of Nov. 1, 2016, to present who have been charged both a disconnect and reconnect fee for related disconnects, and the amounts charged.

On Oct. 8, 2018, Harrison responded that it charged two customers a \$25 NSF check charge within the requested timeframe.¹⁴ Harrison-Ray Water Company, Inc., Tariff WN U-2, Rule 17, Non-Sufficient Funds (NSF) Check Charge states the Company’s allowable charge is \$5 for an NSF.

On Oct. 8, staff requested to be notified when the Company would adjust (refund) the customers’ accounts for NSF fee overcharges. Staff also requested the Company explain how the customers would be notified of the refund.

On Oct. 10, 2018, the Company responded that the customer NSF fees would be adjusted by credit on Oct. 12, 2018, and stated that a note would be included with each affected customer’s bill regarding the adjustment to their accounts.

Also in the Oct. 8, 2018, email to staff, the Company reported that there were no disconnection or reconnection charges to customers during the requested timeframe.

¹³ See Docket UW-180886 in which the commission classified Sunrise Acres as a water company subject to commission regulation.

¹⁴ See Attachment J for a copy of email to Staff, dated Oct. 8, 2018.

Findings

Harrison charged two customers a \$25 NSF check charge on Aug. 31, 2018. Staff provided the Company with a copy of its tariff, which allows the Company to charge a \$5 NSF check charge. The Company has indicated it would refund the customers the improper charges and include a notice explaining the credit.

In addition, Staff finds that the Company failed to bill customers monthly as required in Tariff WN U-2, Rule 11.

Harrison-Ray Water Company, Inc.

Description	RCW	Violations
Failure to bill customers the NSF charge required by the company's tariff.	80.28.080	2
Failure to bill customer monthly, as required by the company's tariff. (Customers B, C, D, F, L)	80.28.080	17
	Total	19

Availability of Information

Investigation

WAC 480-110-315 requires a water company to notify its customers of its regular business hours, telephone number, mailing address, a 24 hour emergency telephone, pager, voice messaging, and fax machine or mobile phone number at least once a year. Further, a water company must advise its customers and the commission of any change in address or telephone number(s) at least ten days prior to the effective date. When a non-emergency call is received, the company must return the customer's call within two business days, and respond to a written inquiry within two weeks of receiving the letter.

The water company must provide a copy of the commission's Consumer Guide to each new applicant, and once a year notify its current customers of the availability of the Guide and how to obtain a copy.

Staff reviewed 12 informal complaints filed at the commission against Harrison-Ray Water Company, Inc., from Aug. 1, 2017, through Jan. 31, 2018, as well as documents obtained from the Company.

Findings

Staff finds that Harrison-Ray Water Company, Inc., failed to make available the required information to both customers and staff and failed to timely respond to customers, and finds the following violations:

Harrison-Ray Water Company, Inc.

Description	WAC	Violations
Failure to provide customer a 24-hour emergency telephone number.(Customer D) ¹⁵	480-110-315(1)	1
Failure to notify the commission of changes to its contact information (email and phone number) ten days prior to the	480-110-315(2)	6

¹⁵ Refer to Attachment F for customer complaint summaries.

effective date. (Customers C, E, F, G, I, J)		
Failure to return a customer's non-emergency call within two business days. (Customers I, J)	480-110-315(4)	2
Failure to acknowledge and respond to a customer's written inquiry within two weeks. (Customer G)	480-110-315(5)	2
Failure to provide customers with a copy of the commission's consumer brochure. (One violation per customer.)	480-110-315(6)	242
	Total	253

Application for Service

Investigation

WAC 480-110-325 provides in pertinent part that a water company must obtain applications for service in writing on company-supplied forms.

Harrison-Ray Water Company, Inc., Tariff WN U-2, Rule 3, states, "Each prospective customer desiring water service will be required to sign the utility's standard form of application before service is supplied."

Findings

Staff finds that Harrison-Ray Water Company, Inc., failed to obtain an application for service in writing for at least 266 days, on a company-supplied form, even when the customer continued to request an application.

Harrison-Ray Water Company, Inc.

Description	WAC	Violations
Failure to provide customer an application of service in writing. (Customer G)	480-110-325(1)	266
	Total	266

Discontinuing Service

Investigation

WAC 480-110-355 provides in part that a water company must notify customers before disconnecting their service except in case of danger to life or property. In all other cases, the company must not disconnect service until it serves a written disconnection notice on the customer, either by mail, or, at the company's option, by personal delivery of the notice to the customer's address, attached to the primary door.

The notice must have a delinquent date that is no less than eight business days after the date of personal delivery and must include all pertinent information about the reason for the disconnection notice and how to correct the problem.

The company must include its name, address, and telephone number by which a customer may contact the company to discuss the pending disconnection of service. In addition, a second notice must be provided.

The Company's Tariff WN U-2, Rule 14 - Discontinuance of Service, is specific on how the

Company is to administer notification to customers for discontinuance of service.

Findings

Staff finds that Harrison failed to properly notify customers of a pending disconnection. The Company claimed to be unaware that a second notice to the customer was required as reflected in the below excerpt of staff's notes from the April 9-10, 2018, meeting with the company:¹⁶

Ms. Harrison did not understand that the company is required to provide two notices prior to disconnecting the service. They provide one notice before disconnection and hang another notice on the primary door notifying the customer that water has been disconnected. She was under the misunderstanding that the door hanger [stating] that service was disconnected was the second required notice.

The notice placed on the customer's door did not provide a telephone number or physical address for the customer to contact to discuss how to correct the problem.¹⁷

Harrison Ray Water Company, Inc.

Description	WAC	Violations
Failure to provide the required notice prior to disconnect of service.	480-110-355(3)	1
	Total	1

Form of Bills

Investigation

WAC 480-110-375 provides that customer bills must not exceed three months and identify if the company is billing in arrears or advance.

The bill must show the date the bill becomes delinquent if not paid. The minimum specified time must be 15 days after the bill's mailing date if mailed from within the state of Washington.

If the customer is metered, the bill must include the current and previous meter readings, the current read date, and the number and kind of units consumed.

When a company has cause to back-bill a customer, the company must allow the customer payment arrangements, if requested, for the same number of months as the cumulative total of months being back-billed.

Findings

Staff finds that Harrison-Ray Water Company, Inc., failed to issue bills according to WAC 480-110-375 and the Company's tariff failed to have a bill due date 15 days after the mail date; failed to have the meter's current read date; and failed to allow customer payment arrangements equal to the number of months back-billed.

¹⁶ See Attachment K for a copy of Staff's notes from April 9-10, 2018, meeting with the company.

¹⁷ See Attachment L for a copy of Company's disconnect notice.

Harrison-Ray Water Company, Inc.

Description	WAC	Violations
Failure to issue bills not exceeding three month intervals. (Customers F, H)	480-110-375(1)(a)	10
Failure to show the date the bill becomes due or the bill was due within 15 days after it was mailed. (Customer C)	480-110-375(1)(f)	4
Failure to include on the customer's bill the current and previous meter readings, the current read date, and the number and kind of units consumed. (Customer C)	480-110-375(1)(h)	4
Failure to allow the customer payment arrangements for the same number of months equal to the total of months being back-billed. (Customer H)	480-110-375(4)	1
Total		19

Complaints and Disputes

Investigation

WAC 480-110-385 provides in part that when a company receives a complaint or dispute from a customer or an applicant for service it must acknowledge the complaint, investigate promptly, and report the results to the complainant.

When commission staff refers an informal complaint to the company, the company must investigate and report the results to commission staff within two business days and keep commission staff informed of the progress toward the solution and final result.

Findings

Staff finds that Harrison-Ray Water Company, Inc., failed to acknowledge customer complaints regarding requests for service; failed to investigate customer complaints related to not receiving bills for service; failed to investigate customer complaints about not receiving bills; failed to investigate and report results of informal complaints to staff within two days; and failed to keep commission staff informed of progress toward the solution and final result of the investigation.

Harrison-Ray Water Company, Inc.

Description	WAC	Violations
Failure to acknowledge customer's complaint regarding request for service. (Customers E, G, I, J)	480-110-385(1)(a)	4
Failure to promptly investigate customer's complaint regarding not receiving bills. (Customers D, E, F, I, J)	480-110-385(1)(b)	5
Failure to report the results of its investigation to the consumer when the consumer called and requested to receive bills. (Customers I, J)	480-110-385(1)(c)	2
Failure to investigate and report results of the informal complaint to staff within two days. (Customers A, B, C, D, E, G, H, I, J, K, L)	480-110-385(3)(a)	314
Failure to keep the commission informed of progress toward the solution and the final result of investigation. (Customers E, J)	480-110-385(3)(b)	32
Total		357

Investigation Findings – Harrison-Ray Water Company, Inc.

Harrison-Ray Water Company, Inc., could have avoided the majority of the violations recorded as a result of the informal complaints by simply responding timely to commission staff as required. Harrison failed to respond to commission staff in almost every informal complaint filed with the commission. The Company also failed to respond to portions of the data request sent to the Company as part of this investigation. With respect to any responses staff did receive from the Company, the documentation submitted was incomplete. The Company's customers received the same lack of response, which caused the customers much frustration as they attempted to get billing statements from the Company. The commission continued to receive informal complaints about the Company after the investigation was initiated. Consumer Protection complaint staff were not able to adequately investigate the complaints because the Company was simply non-responsive to staff's requests. Staff provided customers with information on how to file a formal complaint. Neighbors banded together, compared notes, and nine formal complaints were filed.¹⁸

After staff traveled to the Company on April 9 and 10, 2018, to obtain documentation and provide technical assistance, the Harrisons were still not able to comply with requests for documentation.

In September 2018, Mr. Harrison notified staff that he was turning the response to complaints over to Ms. McClure, who is his CPA. As soon as Ms. McClure began to work on the complaints, staff was able to help the customers get their complaints resolved. Staff is concerned that employing Ms. McClure was only a temporary solution because she plans to return to her profession as a CPA in a few months.

Recommendation

Staff recommends that the commission issue a formal complaint against Harrison-Ray Water Company, Inc., and recommends the commission assess penalties in the amount of \$46,100 for the following 915 violations:

- 19 violations of RCW 80.28.080, Published rates to be charged.
- 253 violations of WAC 480-110-315(1)(2)(4)(5)(6), Availability of information.
- 266 violations of WAC 480-110-325, Application for service.
- 1 violation of WAC 480-110-355(3), Notice Prior to Disconnecting Service
- 19 violations of WAC 480-110-375(1)(a)(e)(f)(h)(4), Form of bills.
- 357 violations of WAC 480-110-385(1)(a)(b)(c)(3)(a)(b), Water company responsibility for complaints and disputes.

¹⁸ Dockets UW-180081 and UW-180144 through 180151.

HARRISON WATER COMPANY/KIONA, LLC

Published Rates to be Charged

Investigation

RCW 80.28.080 states in part that the company must bill customers according to the company's tariff.

On Oct. 4, 2018, staff requested Harrison respond to the following documentation related to rates:

1. A list of all customers (by individual company) for the period of Nov. 1, 2016, to present who have been charged a NSF fee, and the amount charged.
2. A list of all customers (by individual company) for the period of Nov. 1, 2016, to present who have been charged a reconnect fee, and the amount charged.
3. A list of all customers (by individual company) for the period of Nov. 1, 2016, to present who have been charged both a disconnect and reconnect fee for related disconnects, and the amounts charged.

On Oct. 8, 2018, Harrison responded that it charged eight customers a \$15 NSF check charge within the requested timeframe.¹⁹ Harrison Water Company/Kiona, LLC, Tariff WN U-2, Rule 17, Non-Sufficient Funds (NSF) Check Charge states the Company's allowable charge is \$4 for an NSF fee.

On Oct. 8, staff requested to be notified when the Company would adjust (refund) the customers' accounts for overcharged NSF fees. Staff also requested the Company explain how the customers would be notified of the refund.

On Oct. 10, 2018, the Company responded that the customer NSF fees would be adjusted on Oct. 12, 2018, and would be mailed the same week. The Company stated that a note would be included with the customers' bills regarding the adjustment to their accounts.

Also in the Oct. 8, 2018, email to staff, the Company reported that there were no disconnections or reconnections during the requested timeframe.

Findings

Harrison charged eight customers a \$15 NSF check charge. Staff provided the Company with a copy of its tariff, which allows the Company to charge a \$4 NSF check charge. The Company has indicated it would refund the customers the improper charges and include a notice explaining the credit.

Harrison Water Company/Kiona, LLC.

Description	RCW	Violations
Failure to bill customers according to the company's tariff.	80.28.080	8
	Total	8

¹⁹ Refer to Attachment J for a copy of email to Staff, dated Oct. 8, 2018.

Availability of Information

Findings

Staff finds that Harrison Water Company/Kiona, LLC, failed to make available the required information to both customers and staff and failed to timely respond to customers, and finds the following violations:

Harrison Water Company/Kiona, LLC

Description	WAC	Violations
Failure to provide customers a 24-hour emergency telephone number. (Customers M, Q) ²⁰	480-110-315(1)	2
Failure to notify the commission of changes to its contact information (email and phone number) ten days prior to the effective date. (Customer P)	480-110-315(2)	1
Failure to return a customer's non-emergency call within two business days. (Customers N, V)	480-110-315(4)	4
Failure to acknowledge and respond to a customer's written inquiry within two weeks. (Customer N)	480-110-315(5)	1
Failure to provide customers with a copy of the commission's consumer brochure. (One violation per customer.)	480-110-315(6)	213
	Total	221

Application for Service

Investigation

WAC 480-110-325 provides in pertinent part that a water company must obtain applications for service in writing, on company-supplied forms.

Harrison Water Company/Kiona, LLC's Tariff WN U-2, Rule 3, states, "Each prospective customer desiring water service will be required to sign the utility's standard form of application before service is supplied."

Findings

Staff finds that Harrison Water Company/Kiona, LLC, failed to obtain an application for service in writing, on company-supplied forms, even when a customer continued to request an application.

Harrison Water Company/Kiona, LLC

Description	WAC	Violations
Failure to provide customer an application of service in writing. (Customer S)	480-110-325(1)	1
	Total	1

Discontinuing of Service

Investigation

WAC 480-110-355 provides in part that a water company must notify customers before disconnecting their service except in case of danger to life or property. In all other cases, the company must not disconnect service until it serves a written disconnection notice on the customer, either by mail, or, at the company's option, by personal delivery of the notice to the

²⁰ Refer to Attachment F for all customer complaint summaries.

customer's address, attached to the primary door.

The notice must have a delinquent date that is no less than eight business days after the date of personal delivery and must include all pertinent information about the reason for the disconnection notice and how to correct the problem.

The company must include its name, address, and telephone number by which a customer may contact the company to discuss the pending disconnection of service. In addition, a second notice must be provided.

The Company's Tariff WN U-2, Rule 14 - Discontinuance of Service, is specific on how the Company is to administer notification to customers for discontinuance of service.

Findings

Staff finds that Harrison failed to properly notify customers of a pending disconnection. The Company claimed to be unaware that a second notice to the customer was required. The notice placed on the customer's door provided notice of fewer than eight business days and did not provide a telephone number or physical address for the customer to contact to discuss how to correct the problem.²¹

Harrison Water Company/Kiona, LLC

Description	WAC	Violations
Failure to provide the required notice prior to disconnect of service. (Customer M)	480-110-355(3)	1
	Total	1

Form of Bills

Investigation

WAC 480-110-375 provides that customer bills must not exceed three months and identify if the company is billing in arrears or advance. The bills must show a reference to the applicable rate schedule, identify and show each separate charge as a line item, show the amount of the bill, and include enough information that, together with tariff rates, the customer can calculate his or her bill.

The bill must show the date the bill becomes delinquent if not paid. The minimum specified time must be 15 days after the bill's mailing date if mailed from within the state of Washington.

When a company has cause to back-bill a customer, the company must allow the customer payment arrangements, if requested, for the same number of months to pay as the cumulative total of months being back-billed.

Findings

Staff finds that Harrison Water Company/Kiona, LLC, failed to issue bills according to WAC 480-110-375 and the Company's tariff; failed to provide enough information on bills that the customer could calculate rates; failed to have a bill due date 15 days after the mail date; failed to

²¹ See Attachment L for a copy of Company's disconnect notice.

have the meters' current read date; and failed to allow customer payment arrangements equal to the number of months back-billed.

Harrison Water Company/Kiona, LLC

Description	WAC	Violations
Failure to issue bills not exceeding three month intervals. (Customers M, P, Q)	480-110-375(1)(a)	13
Failure to allow the customer payment arrangements for the same number of months equal to the total of months being back-billed. (Customer P)	480-110-375(4)	1
Total		14

Complaints and Disputes

Investigation

WAC 480-110-385 provides in part that when a company receives a complaint or dispute from a customer or an applicant for service it must acknowledge the complaint, investigate promptly, and report the results to the complainant.

When commission staff refers an informal complaint to the company, the company must investigate and report the results to commission staff within two business days and keep commission staff informed of the progress toward the solution and final result.

Findings

Staff finds that Harrison Water Company/Kiona, LLC, failed to acknowledge customer complaints regarding requests for service; failed to investigate customer complaints related to not receiving bills for service; failed to investigate customer complaints about not receiving bills; failed to investigate and report results of informal complaints to staff within two days; and failed to keep commission staff informed of progress toward the solution and final result of the investigation.

Harrison Water Company/Kiona, LLC

Description	WAC	Violations
Failure to investigate and report results of the informal complaint to staff within two days. (Customers M, N, O, P, Q, R, S, T U, V)	480-110-385(3)(a)	207
Failure to keep the commission informed of progress toward the solution and the final result of investigation. (Customers O, R, T, U, V)	480-110-385(3)(b)	118
Total		325

Retaining and Preserving Records and Reports

Investigation

WAC 480-110-485 states in part that the water company must retain all records and reports for three years unless otherwise specified.

Harrison Water Company/Kiona, LLC.

Description	WAC	Violations
Failure to retain and preserve records and reports. (Customer Q)	480-110-485(1)	1
	Total	1

Findings

Staff finds that Harrison did not retain or preserve customer records and was unable to produce many customer account histories that were substantive. The Company's records were not a true copy of the bills sent to customers. When, and if, an error was discovered, the Company would enter it into the Company's billing system. The customer's record would update and the past history would no longer be available. The Company failed to include all the customer records requested in the Feb. 21, 2018, data request.

Recommendation

Staff recommends that the commission issue a formal complaint against Harrison Water Company/Kiona, LLC, and recommends the commission assess penalties in the amount of \$28,300 for the following 571 violations:

- 8 violations of RCW 80.28.080, Published rates to be charged.
- 221 violations of WAC 480-110-315(1)(2)(4)(5)(6), Availability of information.
- 1 violation of WAC 480-110-325, Application for service.
- 1 violation of WAC 480-110-355, Discontinuing of Service.
- 14 violations of WAC 480-110-375(1)(a)(h)(4), Form of bills.
- 325 violations of WAC 480-110-385(3)(a)(b), Water company responsibility for complaints and disputes.
- 1 violation of WAC 480-110-485, Retaining and preserving records.

SUMMARY OF RECOMMENDATIONS

Penalty

Staff typically recommends a “per violation” penalty against a regulated company where the violations result in serious consumer harm; for repeat violations of a rule after the company receives technical assistance; or for intentional violations of commission laws or rules. The commission has the authority to assess penalties of \$100 per violation, per day.²² The commission also has the authority to assess penalties of up to \$1,000 per violation, per day through a formal complaint process.²³

In this investigation, staff documented 1,486 violations of laws and rules administered by the commission. Staff considered the following factors to determine the recommended penalty amount:

1. **How serious or harmful the violations are to the public.**

Customers identified in this report were not given the protections provided by the rules with respect to availability of information; applications for service; form of bills; complaints and disputes; and disconnection and reconnection notices.

The complaints against Harrison are numerous. Harrison has failed to respond to both customers and commission staff. Staff has not been able to complete and close informal complaints because the Company simply fails to respond to its requests. In the instances when the Company did provide responses, the responses were either inaccurate or incomplete.

Customers are extremely frustrated with how the Company conducts its business, and staff’s investigation found that the water companies are grossly mismanaged. Customers created a Facebook page to discuss their dissatisfaction with the Company’s management. Customers also state that they have no confidence that their bills are accurate and that payments made are being appropriately credited.

Harrison admits that it does not read the meters at the end of the month, yet every bill reviewed states that the meter was read on the last day of the month. The good news is that when staff visited the Company, it appeared that the meter readings were consistent and that the customers were being charged correctly, even if the meter read dates are not documented correctly.

2. **Whether the violations are intentional.**

The Company has received technical assistance through the commission’s informal complaint process, and continues to receive violations. Failure to follow guidance

²² RCW 80.04.405 allows the commission to assess an administrative penalty for any violation by a regulated company of a statute, rule, the company’s own tariff, or commission order.

²³ RCW 80.04.380 allows the commission to assess a penalty of up to \$1,000 for each violation following a hearing.

provided via technical assistance creates an inference that the violations are intentional. The Company has made multiple, repeated excuses regarding why it cannot provide timely responses to commission staff and customer requests for documentation related to the customer complaints.

In an attempt to work with the Harrisons and also obtain requested documents, Complaint and Regulatory staff made an appointment and met with the Company owners at their place of business. Staff collected much of the requested documents for customer account histories.

3. Whether the company self-reported the violations.

The Company did not self-report any violations.

4. Whether the company was cooperative and responsive.

Staff believes the Company is neither cooperative nor responsive to commission staff and customers' requests for information. For example, when asked why customers are not receiving bills, the Company responded that they are, and then when the problem continued, the Company blamed the post office, stating that USPS is damaging the billing statements and did not tell the Company. Although the billing post cards did have damage created by machinery at the post office and were returned to the Harrisons, is it not plausible that the same customers did not receive a bill every month for a span of sometimes six months or more as a result of damage by the post office.

The Company did begin to mail the perforated bills in envelopes to prevent damage by the post office; however, commission staff then received complaints that the customer names did not show up in the envelope window and that, on occasion, customers would receive another customer's bill along with theirs in the envelope.

It is clear that the Company's new "machine" (computer/billing software) was not fully understood by the owners and errors were made. Company telephone numbers were changed without the commission or customers being notified, making it difficult to reach the Company and creating concern for customers and staff alike.

Both Mr. and Ms. Harrison have simply hung up the phone on staff while staff attempted to discuss requests for information. Ms. Harrison has admitted to staff that she has hung up on customers so that she wouldn't say anything she shouldn't.

Attempts to have the Company respond to staff's request for information have been long-standing. On Sept. 20, 2017, the commission's legal counsel sent a letter to the Company notifying the Harrisons that numerous attempts to contact them had been

made by email, phone, fax, and mail. The Company was notified in this letter that potential monetary penalties could be enforced.²⁴

5. Whether the company promptly corrected the violations.

Violations were not corrected promptly, if at all. Complaint staff could not assist the customers because they were not able to obtain account histories or other necessary documentation from the Company to conduct a thorough investigation. Often, attempts to gain information took months and required assistance from legal counsel and a personal visit to the Company by staff. During this investigation, in an attempt to obtain information, staff sent emails and left voice messages with little results. In an effort to assist the Company and customers, staff spent April 9 and 10, 2018, at the Company's place of business to gather information and provide technical assistance. Staff requested the company look for specific billing errors for customers and the Company was able to locate and correct a billing error. That customer's account was appropriately credited at that time. Even after staff provided extensive technical assistance to the Company, customer continued to file complaints.

6. The number of violations.

Staff has documented 1,459 violations of WAC 480-110 and 27 violations of RCW 80.28.080. The number of documented violations in this report are far less than what has actually occurred to date. Complaints about the Company continue to be received at the commission.

7. The number of customers affected.

Harrison has approximately 455 total customers for the two companies referred to in this report. Every customer is affected by the form of bill violations because Harrison's monthly bills do not provide a line item for each separate charge; they are not billed according to the tariffs on file at the commission; and the Harrisons have not responded to customers' attempts to reach them.

8. The likelihood of recurrence.

The violations continue; however, there seems to be a light at the end of the tunnel. On Sept. 6, 2018, Mr. Harrison left staff a voice message stating, "I'm going to end up transferring everything over to my CPA and have her do the majority of the returns, calls for, you know, all the deals because Dacia just can't get to it; she's not capable." Mr. Harrison did not provide the name or contact information for CPA; however, staff was able to obtain it.

²⁴ See Attachment M for a copy of Assistant Attorney General letter to Company, dated Sept. 20, 2017.

Ms. McClure is a temporary fix but is currently responding to both staff and customers. Mr. Harrison receives calls from customers (usually voice message), and then relays the information to Ms. McClure, who in turn, contacts the customer.

If there are no changes made to the business operations after the CPA is no longer providing the Company assistance, staff is confident that the violations will reoccur.

9. The company's past performance regarding compliance, violations, and penalties.

Harrison-Ray Water Company, Inc., received a \$500 penalty for failure to timely file its annual report and pay regulatory fees (Docket UW-170419). The Company received a final invoice on Aug. 23, 2017, and the unpaid penalty was sent to collections on Feb. 23, 2018.

Harrison Water Company/Kiona, LLC received a \$500 penalty for failure to timely file its annual report and pay regulatory fees (Docket UW-170418). The Company received a final invoice on Aug. 23, 2017, and the unpaid penalty was sent to collections on Feb. 23, 2018.

10. The company's existing compliance program.

Staff is unaware of a compliance program in place at Harrison.

Staff Penalty Recommendation – Harrison-Ray Water Company, Inc.

While the law allows the commission to assess a penalty of up to \$1,000 per violation, staff believes the full penalty would be overly burdensome based on the Company's reported revenue. The recommended penalty provides a significant incentive to avoid repeat violations. Staff recommends the commission issue a formal complaint against Harrison-Ray Water Company, Inc., and assess a penalty of up to \$46,100 for 915 violations of laws and rules administered by the commission, as follows:

- Up to \$19,000 for 19 violations of RCW 80.28.080, for failing to charge customers the rates published in its tariff.
- Up to \$2,530 for 253 violations of WAC 480-110-315(1)(2)(4)(5)(6) for failure to provide customers a 24-hour emergency telephone number, failure to notify the commission of changes to its contact information, failure to return customer's non-emergency call, failure to acknowledge customer's written inquiry, and failure to provide customers with a copy of the commission's consumer brochure.
- Up to \$1,000 for 266 violations of WAC 480-110-325(1) for failure to provide a customer with an application for service.
- Up to \$1,000 for 1 violation of WAC 480-110-355(3) for failure to properly provide the required notice prior to disconnect of service.
- Up to \$19,000 for 19 violations of WAC 480-110-375(1)(a)(e)(f)(h)(4) for failure to issue bills according to the rule; failure to provide enough information on bills for customers to calculate rates; failure to have a bill due date fifteen days after the mail date; failure to

record accurate meter read date; and failure to allow customer payment arrangements equal to number of months back-billed.

- Up to \$3,570 for 357 violations of WAC 480-110-385(1)(a)(b)(c)(3)(a)(b) for failure to acknowledge complaints regarding requests for service, failure to investigate customer complaints, failure to timely investigate and report results of informal complaints to staff; and failure to keep commission staff informed of progress toward the solution and final result of the investigation.

Staff Penalty Recommendation – Harrison Water Company/Kiona, LLC

Staff recommends the commission issue a formal complaint against Harrison Water Company/Kiona, LLC and assess a penalty of up to \$30,460 for 571 violations of commission laws and rules, as follows:

- Up to \$8,000 for eight violations of RCW 80.28.080, for failing to charge customers published rates for non-sufficient funds.
- Up to \$2,210 for 221 violations of WAC 480-110-315(1)(2)(4)(5)(6) for failure to provide customers a 24-hour emergency telephone number, notify the commission of changes to its contact information, failure to return customer's non-emergency call, failure to acknowledge customer's written inquiry, and failure to provide customers with a copy of the commission's consumer brochure.
- Up to \$1,000 for one violation of WAC 480-110-325(1) for failure to provide a customer with an application for service.
- Up to \$1,000 for one violation of WAC 480-110-355(1) for failure to properly provide the required notice prior to disconnect of service.
- Up to \$14,000 for 14 violations of WAC 480-110-375(1)(a)(h)(4) for failure to issue bills according to the rule; failure to provide enough information on bills for customers to calculate rates; failure to have a bill due date fifteen days after the mail date; failure to record accurate meter read date; and failure to allow customer payment arrangements equal to number of months back-billed.
- Up to \$3,250 for 325 violations of WAC 480-110-385(3)(a)(b) for failure to acknowledge complaints regarding requests for service, failure to investigate customer complaints, failure to timely investigate and report results of informal complaints to staff; and failure to keep commission staff informed of progress toward the solution and final result of the investigation.
- Up to \$1,000 for one violation of WAC 480-110-485 for failure to maintain records.