



March 16, 2020

WUTC Advice No. 20-1

VIA ELECTRONIC FILING

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Re: Rule Changes Regarding Bills/Late Payment Charge

Cascadia Water, LLC (Cascadia or Company), files herewith the following revisions to the tariffs listed below.

For the reasons below, Cascadia respectfully requests that the Commission approve this tariff change to become effective on March 27, 2020, with less than statutory notice (LSN). The information required by WAC 480-80-122(1) is included below. In accordance with WAC 480-80-122(2), the proposed tariff sheets attached herein are stated to become effective with service on and after April 15, 2020.

Company	Sheet	Tariff	Schedule
Lehman	First Revision of Sheet No. 8	Water Service Rules and Regulations	Rule 11 – Bills / Late Payment Charge
Sea View	First Revision of Sheet No. 27	Water Service Rules and Regulations	Rule 10 – Bills / Late Payment Charge
Estates	First Revision of Sheet No. 44	Water Service Rules and Regulations	Rule 14 – Bills / Late Payment Charge

Purpose

The purpose of this filing is to provide minor modifications to the tariff sheets listed above that would allow the Company discretion in charging Late Payment Charges. The Company seeks this flexibility in order to be immediately responsive to the rapidly changing economic conditions facing customers in the wake of the COVID-19 pandemic and respectfully requests an effective date of March 27, 2020, with less than statutory notice.

Background

The Company is actively monitoring and evaluating the latest news and impacts of the COVID-19 pandemic. In anticipation of potential impacts to our customers that may be affected by COVID-19, the Company wants to maintain flexibility by not requiring the charging of Late Payment Charges.

Proposed Changes

The Company proposes to make a minor change to the rules listed above to indicate that Late Payment Charges **may** be assessed but the Company is not required to assess them as circumstances may warrant.

LSN Information Required by WAC 480-80-122

a) Utility Information:

Cascadia Water LLC
18181 SR 525
Freeland, Washington 98249

Culley Lehman
Telephone: (360) 331-7388 Fax: 360-331-2374
Email: info@cascadiawater.com

b) Tariff Identification Information:

Tariff WN U-1:

Company	Sheet	Tariff	Schedule
Lehman	First Revision of Sheet No. 8	Water Service Rules and Regulations	Rule 11 – Bills / Late Payment Charge
Seaview	First Revision of Sheet No. 27	Water Service Rules and Regulations	Rule 10 – Bills / Late Payment Charge
Estates	First Revision of Sheet No. 44	Water Service Rules and Regulations	Rule 14 – Bills / Late Payment Charge

c) Concise description of the changes proposed:

The Company proposes a minor change that would allow the Company to not charge Late Payment Charges by changing operative language in the tariff from “shall” to “may.”

d) Reason for requesting LSN handling:

The Company seeks to be immediately responsive to the rapidly changing economic conditions facing customers in the wake of the COVID-19 pandemic.

e) Effective Date Requested:

March 27, 2020

f) Tariff Authority:

In accordance with WAC 480-80-122(1)(f) see signature on tariff sheets.

Conclusion

The Company respectfully requests that the Commission approve these tariff changes to become effective on March 27, 2020, with less than statutory notice.

Copies of this letter and the attached filing are available in the Company’s main office in Freeland, Washington, and on the website at www.nwnaturalwater.com.

Washington Utilities and Transportation Commission
Cascadia WUTC Advice No. 20-1
March 16, 2020; Page 3

As requested by WAC 480-80-103(4)(a), I certify that I have authority to issue tariff revisions on behalf of Cascadia.

Please address correspondence on this matter to me with copies to the following:

eFiling
NW Natural Rates & Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204
Fax: (503) 220-2579
Telephone: (503) 610-7330
eFiling@nwnatural.com

Respectfully submitted,

/s/ Natasha Siores

Natasha Siores
Manager, Regulatory Compliance
NW Natural
250 SW Taylor Street
Portland, Oregon 97204
503-610-7074
natasha.siores@nwnatural.com

Attachments:

NEW-Cascadia-WUTC-Advice-20-1-Estates-Trf-Rule-14-03-16-2020
NEW-Cascadia-WUTC-Advice-20-1-Lehman-Trf-Rule-11-03-16-2020
NEW-Cascadia-WUTC-Advice-20-1-Sea-View-Trf-Rule-10-03-16-2020

WATER SERVICE
RULES AND REGULATIONS
ESTATES SYSTEM

Rule 11– Service Visit Charge

The customer will pay a Service Visit Charge as specified in **Schedule X** when:

- a. A Utility employee or agent is dispatched to the premise and the condition was caused by or was the responsibility of the customer.
- b. The Utility employee or agent has not had access to read the meter for at least two (2) billing cycles and the Utility employee or agent is dispatched to access the meter and continues to not have access to the meter. Where the meter has not been read, a minimum bill will be rendered and adjusted when the next succeeding meter reading is available.

Rule 12 – Interruption to Service

The Utility will make a diligent effort to render uninterrupted service and supply of water. In cases where shut-off is necessary for repair, reconstruction, damage prevention or similar cause, the Utility will give advance notice to its customers of such scheduled shut-off. However, the Utility will not be responsible for any damage that may result from any cessation of services such as above outlined, nor for failure to give notice of shut-off when circumstances are such that it is impossible to give notice as stated above.

Rule 13 – Bills

All bills shall be rendered and paid **bi-monthly** in arrears and are due and payable upon receipt and are considered delinquent no less than twenty (20) days after the date mailed. Bills will be deemed received upon personal delivery to customer or three (3) days following the deposit of the bill in the United States mail to the customer's last known address. Where the meter has not been read, a minimum bill will be rendered and adjusted when the next succeeding meter reading is available.

Rule 14 – Late Payment Charge

Bills are due and payable upon receipt. Bills are considered late twenty (20) days after the bill mailing date. A Late Payment Charge as specified in **Schedule X** of the unpaid balance may be added to each account for each month the bill is unpaid. The late payment charge will not be applied to any disputed amount unless such amount remains unpaid for more than twenty (20) days after the dispute has been resolved.

(T)

Issued: March 16, 2020 Effective: April 15, 2020

Issued by: Cascadia Water, LLC

By: Culley Lehman Title: General Manager

WATER SERVICE
RULES AND REGULATIONS
LEHMAN SYSTEM

Rule 11 - Bills / Late Payment Charge

All bills shall be paid monthly and are due and payable upon receipt and are considered delinquent no less than fifteen (15) days after the date mailed. Bills will be deemed received upon personal delivery to customer or three (3) days following the deposit of the bill in the United States mail to the customer's last known address. Where the meter has not been read, a minimum bill will be rendered and adjusted when the next succeeding meter reading is available.

A Late Payment Charge as specified in **Schedule X** of the unpaid balance may be added to each account for each month the bill is unpaid. The late payment charge will not be applied to any disputed amount unless such amount remains unpaid for more than 15 days after the dispute has been resolved. (T)

Rule 12 - Deposits

The utility may require a deposit in situations where a customer's service has been disconnected for nonpayment of amounts owed to the utility or when a customer is unable to establish or maintain credit with the utility.

The deposit will not be more than an average three-twelfths of estimated annual billing. (For customers billed monthly)

Interest on deposits will be accrued at the rate calculated as a simple average of the effective interest rate for new issues of one year Treasury bill, computed from December 1 of each year, continuing through November 30 of the following year. Interest is computed from the time of deposit to the time of refund and is compounded annually.

Deposits, plus any accrued interest, less any amount owed for service rendered, will be refunded to the customer: 1) where the customer has for 12 consecutive months paid for service when due or 2) upon termination of service.

In addition, the utility will comply with all provisions of the Commission's deposit rules, specifically, the WAC on Deposits.

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Issued by: Cascadia Water, LLC

By: Culley Lehman Title: General Manager

WATER SERVICE
RULES AND REGULATIONS
SEA VIEW SYSTEM

Rule 9 - Interruption to Service

The utility will make a diligent effort to render uninterrupted service and supply of water. In cases where shut-off is necessary for repair, reconstruction, damage prevention or similar cause, the utility will give advance notice to its customers of such scheduled shut-off. However, the utility will not be responsible for any damage that may result from any cessation of services such as above outlined, nor for failure to give notice of shut-off when circumstances are such that it is impossible to give notice as stated above. Original Sheet No. 9

Rule 10 – Bills / Late Payment Charge

All bills shall be paid bi-monthly in arrears and are due and payable upon receipt and are considered delinquent no less than fifteen (15) days after the date mailed. Bills will be deemed received upon personal delivery to customer or three (3) days following the deposit of the bill in the United States mail to the customer's last known address. Where the meter has not been read, a minimum bill will be rendered and adjusted when the next succeeding meter reading is available.

Bills are due and payable upon receipt. Bills are considered late 15 days after the bill mailing date. A Late Payment Charge as specified in **Schedule X** of the unpaid balance may be added to each account for each month the bill is unpaid. The late payment charge will not be applied to any disputed amount unless such amount remains unpaid for more than 15 days after the dispute has been resolved. (T)

In addition, the utility will comply with all provisions of the Commission's deposit rules, specifically, the WAC on Deposits.

Issued: March 16, 2020 Effective: April 15, 2020

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