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**Subject:** WUTC Docket 240151  
**Date:** Friday, June 21, 2024 8:00:28 AM

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External Email

I write in opposition to Cascadia Water LLC's outrageous rate increase request. I write specifically regarding any claim by Cascadia or its NW Natural attorney Eric Nelsen or others, including the WUTC, that any information relied upon by Cascadia in rate case 240151 is CONFIDENTIAL.

Cascadia, by letter of Mr. Nelsen, of parent company NW Natural of April 12, 2024, claims confidentiality pursuant to WAC 480-07-160(5)(a) regarding:  
"the confidential organization chart of NW Natural Holding Company; (2) the confidential (unredacted) version of Cascadia Water's general ledger and (3) additional confidential information that may be requested in this docket."

The ambiguity of Cascadia's claim of confidentiality for "any additional confidential information that may be requested" is mind-boggling. The regulations promulgated by WAC 480-07-160(5)(a) do not treat claims of confidentiality of otherwise public records lightly. The regulation requires that Cascadia must: "make the claim in writing at the same time the provider submits the document containing the information and must state the basis of the claim." WAC 480-07-160 (emphasis added). Cascadia must also "submit both a redacted and an unredacted version to the commission." WAC 480-07-160 (emphasis added).

I don't know if Cascadia submitted redacted and unredacted versions of its parent company's organization chart or its "general ledger" but it is categorically impossible to provide redacted and unredacted copies of any "additional confidential information that may be requested." Cascadia and its parent company counsel claims of confidentiality must be denied for failure to comply with the very regulation they rely upon.

Additionally, Cascadia has not claimed confidentiality for the information it relies upon to request rate increases. Mr. Nelsen writes that: "confidential information is sensitive information due to the competitive market for water utility acquisitions and the identification of employee names and compensation date, and as such, comprises valuable commercial information. Disclosure of the confidential information could negatively impact Cascadia Water's ability to negotiate future acquisition and/or to attract and retain employees."

Whether such information is truly confidential under Washington law is debatable, but has no relevance to this rate case. Cascadia offers no justification for withholding any of the documentation supporting its current rate increase request, nor the data underlying such documentation.

Customers and this Commission are entitled to know where Cascadia made capital

improvements, how much those improvements cost, whether said improvements have been completed and approved and are in service, whether Cascadia gave any notice to customers of their intention to undertake those improvements or solicited any comments about whether customers felt such improvements were necessary or warranted, who those improvements benefited, any claimed economy of scale that would justify spreading the costs of those improvements to customers not benefited by them and why such benefits should be recouped by a permanent rate increase as opposed to a surcharge.

I know I for one have requested such information beginning on June 12, 2024. I assumed the Commission rate staff would have requested or been supplied such information. Regrettably, I have received no response from Cascadia, NW Natural, or the WUTC. I am told that requests by others for such information have been denied on the basis of confidentiality by Cascadia and Commission rate staff. This is entirely unacceptable.

Cascadia's application for outrageous and unfounded rate increases must be denied and Cascadia must be ordered, in any future rate increase applications, to provide meaningful answers to customers questions and not make unfounded confidentiality claims.

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