

February 21, 2019

VIA ELECTRONIC FILING

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
PO Box 47250
Olympia WA 98504-7250

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: **Docket No. UW- ____ : In the Matter of the Application for the Sale and Transfer of Assets from Estates Water Systems, Inc. to Cascadia Water, LLC.**

Dear Mr. Johnson,

Cascadia Water, LLC (“Cascadia” or “Company”) submits this claim of confidentiality pursuant to WAC 480-07-160(4)(a) in connection with confidential information filed with the Washington Utilities and Transportation Commission on February 21, 2019 in the above-captioned proceeding. Cascadia, through its Application for the Sale and Transfer of Assets from Estates Water Systems, Inc. to Cascadia Water, LLC and supporting Exhibits 1 and 3, discloses certain information that is confidential and constitutes “valuable commercial information” as defined by WAC 480-07-160(2) and protected under WAC 480-07-160 and RCW 80.04.095. The confidential information that Cascadia discloses includes its corporate organization structure, the purchase price for the acquisition of Estates Water Systems, Inc. (“Estates”) and related terms and conditions of the sale, which is sensitive information due to the competitive market for water utility acquisitions, and as such, comprises valuable commercial information. Disclosure of the confidential information could negatively impact the Company’s ability to negotiate future acquisitions. Accordingly, this information is confidential, as defined by WAC 480-07-160(2), and should be protected from public inspection, examination and copying.

Sincerely,

/s/ Lisa Rackner

Lisa Rackner, WSBA No. 39969
Attorney for Cascadia Water, LLC