

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**CASCADIA WATER, LLC,**

**Respondent.**

**DOCKET UW-240151**

**WATER CONSUMER ADVOCATES OF WASHINGTON, INTERVENOR**

November 20, 2024

**Direct Exhibit of Blaine C. Gilles**

**Cascadia Responses to WCAW DRs 21-31**

**Exh. BCG-2**



**Rates & Regulatory Affairs**

UW-240151

Cascadia Water LLC Proposed General Rate Case

**Data Request Response**

Date of Response: 9/25/2024

Responder/Witness: Counsel

**Request No.:** UW-240151 WCAW DR 21

Advocates' prior WCA DR 15 requests that Cascadia:

"Provide all documents that support Cascadia's requested 12 per cent rate of return."

Cascadia's Response:

"Cascadia's requested rate of return is 11.4%, based in part on a 12.0% return on equity. Supporting calculations are included in the Excel Workbooks provided with the application".

Please identify all prior rate cases in Washington where Cascadia received a 12% return on equity.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



**Rates & Regulatory Affairs**

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**Data Request Response**

Date of Response: 9/25/2024

Responder/Witness: Counsel

**Request No.:** UW-240151 WCAW DR 22

Please identify all prior rate cases in any other state where a NW Natural water system company received a 12% return on equity.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



**Rates & Regulatory Affairs**

UW-240151

Cascadia Water LLC Proposed General Rate Case

**Data Request Response**

Date of Response: 9/25/2024

Responder/Witness: Counsel

**Request No.:** UW-240151 WCAW DR 23

Please identify all prior rate cases in any other state where a NW Natural water system company asked for a 12% return on equity.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



**Rates & Regulatory Affairs**

UW-240151

Cascadia Water LLC Proposed General Rate Case

**Data Request Response**

Date of Response: 9/25/2024  
Responder/Witness: Matt Rowell

**Request No.:** UW-240151 WCAW DR 24

Please state the return on equity requested in all prior or current rate cases in any other state by a NW Natural water system company.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



**Rates & Regulatory Affairs**

UW-240151

Cascadia Water LLC Proposed General Rate Case

**Data Request Response**

Date of Response: 9/25/2024

Responder/Witness: Counsel

**Request No.:** UW-240151 WCAW DR 25

Please state the return on equity actually granted to Cascadia or any other NW Natural water system company in all the above referenced rate cases.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



**Rates & Regulatory Affairs**

UW-240151

Cascadia Water LLC Proposed General Rate Case

**Data Request Response**

Date of Response: 9/25/2024

Responder/Witness: Counsel

**Request No.:** UW-240151 WCAW DR 26

Please produce all documents that support Cascadia's requested 10.5% cost of debt for purposes of calculating rate of return.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



**Rates & Regulatory Affairs**

UW-240151

Cascadia Water LLC Proposed General Rate Case

**Data Request Response**

Date of Response: 9/25/2024  
Responder/Witness: Counsel

**Request No.:** UW-240151 WCAW DR 27

Please produce all prior rate cases in Washington where Cascadia received a 10.5% cost of debt for purposes of calculating rate of return.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.





**Rates & Regulatory Affairs**

UW-240151

Cascadia Water LLC Proposed General Rate Case

**Data Request Response**

Date of Response: 9/25/2024

Responder/Witness: Counsel

**Request No.:** UW-240151 WCAW DR 28

Please produce all prior rate cases in any other state where a NW Natural water system company received a 10.5% cost of debt for purposes of calculating rate of return.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



**Rates & Regulatory Affairs**

UW-240151

Cascadia Water LLC Proposed General Rate Case

**Data Request Response**

Date of Response: 9/25/2024

Responder/Witness: Counsel

**Request No.:** UW-240151 WCAW DR 29

Please produce all prior rate cases in any other state where a NW Natural water system company asked for a 10.5% cost of debt for purposes of calculating rate of return.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



**Rates & Regulatory Affairs**

UW-240151

Cascadia Water LLC Proposed General Rate Case

**Data Request Response**

Date of Response: 9/25/2024

Responder/Witness: Counsel

**Request No.:** UW-240151 WCAW DR 30

Please state the cost of debt requested in all prior or current rate cases in any other state by a NW Natural water system company.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



**Rates & Regulatory Affairs**

UW-240151

Cascadia Water LLC Proposed General Rate Case

**Data Request Response**

Date of Response: 9/25/2024

Responder/Witness: Counsel

**Request No.:** UW-240151 WCAW DR 31

Please state the cost of debt actually granted to Cascadia or any other NW Natural water system company in all the above referenced rate cases.

**Response:**

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.