BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,
Complainant,

DOCKET UW-240151

v.

CASCADIA WATER, LLC,

Respondent.

WATER CONSUMER ADVOCATES OF WASHINGTON, INTERVENOR

November 20, 2024

Direct Exhibit of Blaine C. Gilles

Cascadia Response to PC DR 21
Exh. BCG-8



Rates & Regulatory Affairs UW-240151

Cascadia Water LLC Proposed General Rate Case **Data Request Response**

Date of Response: November 6, 2024 Responder/Witness: Culley Lehman

Telephone: 360.661.7781

Email: culley@cascadiawater.com

Request No.: UW-240151 PC DR 21

Does the Company maintain the estimate provided in its response to Public Counsel Informal Data Request No. 6 that it projects "spending \$3-\$4 million each year for the next five years to focus solely on bringing source/storage components into compliance across all of the existing systems"? Please also provide any estimate the Company may have for capital spending over the next five years on (1) water main line replacements and (2) PFAS filtration, both of which were explicitly excluded from its original capital spending estimate.

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 beyond the scope of this proceeding because it requests information related to projections that are not at issue in this case.

Without waiving these objections, the Company responds as follows:

The magnitude and sequencing of investments may develop over time based on the Department of Health's evaluation of Water System Plans. Other changes in regulatory requirements, unforeseen equipment failures, and other factors may also impact the magnitude and sequencing of investments. As discussed in the Direct Testimony of Culley Lehman, none of the systems tested for PFAS have tested positive.

Potential investments are usually identified in the water system plans. Cascadia Water provided the Island County Unified Water System Plan in the Company's response to UW-240151 WCAW DR 36 and the Southwest Water System Plan (Estates, Monterra, Diamond Point, Discovery Bay Village) was submitted to DOH in June 2024 and has not reached the public comment stage.

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Please see the Company's objections and responses to UW-240151 WCAW DRs 69-72.