

**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 70-74

Exh. BCG-11



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 70

Has Cascadia prepared any capital improvement plans for past or future improvements of individual or grouped systems?

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 regarding projects and projections that are not at issue in this case and it lacks temporal limitations. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Yes. These are in the Island County Unified Water System Plan (provided in the Company's response to UW-240151 WCAW DR 36) and the Southwest Water System Plan (Estates, Monterra, Diamond Point, Discovery Bay Village). As stated in the Company's response to UW-240151 WCAW DR 36, the Southwest Water System Plan was submitted to DOH in June 2024. It is still in the review stage with DOH and has not reached the public comment stage. Cascadia Water will provide the Southwest Water System Plan at the public comment stage.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 71

Please produce all capital improvement plans for past or future improvements of individual or grouped systems.

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 regarding projects and projections that are not at issue in this case and it lacks temporal limitations. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Please see the response to UW-240151 WCAW DR 70.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 72

If Cascadia has not prepared capital improvement plans for future improvements of individual or grouped systems explain how you “have projected spending \$3-\$4 million each year for the next five years”?

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 on projects and projections that are not at issue in this case. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water has prepared capital improvement plans; see the Cascadia Water response to UW-240151 WCAW DR 70.



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 73

Please produce all such projections.

Response:

Cascadia Water LLC objects to this request as overbroad, vague, lacks specificity, 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 regarding projects and projections that are not at issue in this case.

See the Cascadia Water LLC response to WCAW DR 70.



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 74

Please produce all documentation you relied upon in such projections, including, but not limited to, engineer reports and designs, budgets, construction bids, chronology of planned construction, cost/benefit analyses, and analyses of impact on consumers and consumer rates.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it refers to all documentation including construction bids, chronology of planned construction, analyses of impact on consumers and consumer rates. 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 regarding projects and projections that are not at issue in this case.