

**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 Response to WCAW DR 10

Exh. BCG-17



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 10

Identify all employees of Cascadia who contributed to the responses to Advocates and Public Counsel's prior data requests by name, title and which requests they responded to.

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 not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued. These informal data requests were provided in an effort to reach a settlement with Staff, Public Counsel, and Advocates, and were not part of the formal discovery process which started on September 11, 2024, pursuant to Order 02.

Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water LLC's responders and witnesses who can speak to the issues in this proceeding are Matt Rowell and Culley Lehman.