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 42

Exh. BCG-15

NW Natural®

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 42

Cascadia further responded to PC IR 1 as follows:

"Second, there are assets installed because of requirements to bring systems into compliance with DOH minimum design standards" (emphasis in original).

Please produce all documents from DOH requiring Cascadia to bring systems into compliance with DOH minimum design standards for each of the eight projects referenced by Cascadia in its response.

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

The document from DOH requiring Cascadia Water to bring systems into compliance with DOH minimum design standards for each of the eight projects referenced by Cascadia Water in its response is the DOH Water System Design Manual (UW-240151 WCAW DR 42 Attachment 1). When Cascadia Water undertook each of the eight projects, it was a requirement to make sure that project was in compliance with DOH minimum design standards per section 1.5 Minimum System Design Requirements:

“Design engineers **must** use good engineering practice (as determined by the Washington State Professional Licensing Board) in all aspects of water system design (WAC 246-290-200). The design engineer **must** consider the water system operation under a full range of expected demands (minimum to maximum) and emergency conditions (WAC 246-290-420).” (Emphasis in original).

1.5 Minimum System Design Requirements

Design engineers **must** use good engineering practice (as determined by the Washington State Professional Licensing Board) in all aspects of water system design (WAC 246-290-200). The design engineer **must** consider the water system operation under a full range of expected demands (minimum to maximum) and emergency conditions (WAC 246-290-420). "Emergency" means a natural or man-made event that causes damage or disrupts normal operations and requires prompt action to protect public health and safety. Examples include fires, power outages, water main breaks, water system component or treatment process failures, floods, or recent evidence of contaminated drinking water.