

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

Docket Nos. UE-060256

WUTC v. CASCADE

RESPONSE OF PUBLIC COUNSEL TO WUTC BENCH REQUEST NO. 1

BENCH REQUEST NO. 1:

Please identify whether you have obtained a functioning or “working” copy of the cost allocation or cost-of-service model referred to in the testimony of Lamar Maxwell Dickey (LMD-1T), or if you have arranged for access to the model. If yes, please describe the arrangements you have made for access to, or a “working” copy of, the model.

RESPONSE:

No, we have not received an actual working copy of the Dickey model. After an initial refusal by Cascade to provide a working model, we initially planned to use the Microcost model that Mr. Lazar has available to him. We have discontinued efforts to obtain the Dickey model, because the model, even in working form, does not produce transparent results. We have adopted the model used by NWIGU witness Schoenbeck and Mr. Schoenbeck's results as our own. We believe the Company should be required, in the future, to use a model similar to the Schoenbeck model, and make it available to all parties on an unrestricted basis.

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