

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

CASCADIA WATER, LLC

Petition for an Accounting Order
Associated with COVID-19 Public
Health Emergency

DOCKET NO. UW-_____

PETITION

I. INTRODUCTION

1 Pursuant to WAC 480-07-370(3)(b) and 480-110-505, Cascadia Water, LLC (“Cascadia Water” or the “Company”) files this petition (“Petition”) with the Washington Utilities and Transportation Commission (the “Commission”) seeking an accounting order to allow the use of deferred accounting, from the date of this Petition forward, for costs associated with the recent COVID-19 public health emergency. As described more fully below, Cascadia Water anticipates that the emergency, overall, will result in costs to customers that the Company seeks to defer for later rate-making treatment.

II. BACKGROUND

2 Cascadia Water is a water company and public service company doing business in the State of Washington and is subject to the jurisdiction of the Commission regarding rates, service, and accounting practices. The Company’s principal place of business is 18181 SR 525, Freeland, Washington 98249.

III. COMMUNICATIONS

3 Communications regarding this Petition should be addressed to:

NW Natural
e-Filing for Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204
Telephone: (503) 610-7330
Fax: (503) 220-2579
Email: eFiling@nwnatural.com

Natasha Siores
Manager, Regulatory Compliance
NW Natural
250 SW Taylor Street
Portland, Oregon 97204
Telephone: (503) 610-7074
Email: natasha.siores@nwnatural.com

4 In addition, Cascadia Water respectfully request that all data requests be addressed to:

e-Filing for Regulatory Affairs
eFiling@nwnatural.com

IV. REASONS FOR REQUEST FOR DEFERRED ACCOUNTING

5 On February 29, 2020, Washington Governor Inslee declared a state of emergency over the COVID-19 pandemic. Cascadia Water has suspended all service disconnections and late payment fees in order to help limit the impact on customers as they navigate these difficult economic times. The public health emergency is expected to drive significant accounts receivable write-off expense. Cascadia Water also may experience other costs related to the emergency that the Company is currently unable to predict and that are not otherwise included in rates. Cascadia Water will document all costs known to be incurred by the COVID-19 public health emergency.

6 Due to the unpredictable and unprecedented nature of the emergency, these costs are not currently recovered in rates, outside normal business risk, and, accordingly, Cascadia Water requests to recover these expenses through deferred accounting.

V. PROPOSED ACCOUNTING TREATMENT

7 Beginning on March 27, 2020, Cascadia Water proposes to account for the expenses incurred as a result of COVID-19 by recording a deferral, in Account 186. In the absence of approval of deferred accounting, Cascadia Water would record costs associated with the COVID-19 public health emergency to various expense accounts.

8 Cascadia Water may determine, as it works through the accounting specifics, that other
accounts will be used also.

VI. ESTIMATED AMOUNTS SUBJECT TO DEFERRAL

9 Cascadia Water is unable to predict an estimate of incurred expense related to COVID-19
while the emergency is still fluid and changing rapidly.

VII. CONCLUSION

10 Cascadia Water respectfully requests that the Commission issue an accounting order
authorizing the Company to defer the costs described in this Petition.

Dated this 27th day of March 2020.

Respectfully Submitted,

CASCADIA WATER, LLC

/s/ Eric W. Nelsen

NW NATURAL

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