

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION

COMMISSION

Docket Nos. UE-060256

WUTC v. CASCADE

**RESPONSE OF PUBLIC COUNSEL TO STAFF
DATA REQUESTS**

Request No: 40
Directed to: Judith Krebs
Date Received: August 21, 2006
Date Produced: September 6, 2006
Prepared by: Jim Lazar
Witnesses: Jim Lazar

WUTC STAFF DATA REQUEST NO. 40

Re: Witness Jim Lazar

Referring to page 38, lines 6 to 8 of Mr. Lazar's direct testimony, please provide all studies in the last 10 years that Mr. Lazar has done to support his statement that "All of these proposed charges will have a much more severe effect on low-income consumers (who are more subject to disconnect and reconnect fees) and to renters (who are more subject to the Account Activation Charge)."

RESPONSE:

Mr. Lazar has relied on studies performed by others. See the testimony of Charles Eberdt, Exhibit No. __ (CME-1T), at page 11 and the testimony of Steven Weiss, Exhibit No. __ (SDW-1T), at pages 29-30 in this docket.