

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

**Docket Nos. UE-060256**

**WUTC v. CASCADE**

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

Request No: 47  
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. 47**

**Re: Witness Jim Lazar**

Please provide all surveys that Mr. Lazar has completed of the behavior of Cascade customers, which indicates whether they will decrease purchases of natural gas if an inverted block rate is instituted for residential customers.

**RESPONSE:**

Mr. Lazar has not done surveys of Cascade customers. His estimate of long-run elasticity was based on multiple elasticity estimates he has reviewed over the past 32 years of work on utility rate analysis. He expects Cascade customers to have a typical response to pricing.