

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

Docket Nos. UE-060256

WUTC v. CASCADE

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

Request No: 49
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. 49

Re: Witness Jim Lazar

Please provide all studies done by Mr. Lazar for the Cascade service area that indicate the percentage of customers who have ever read their gas meter.

RESPONSE:

Objection, insofar as the question is not relevant and is not reasonably calculated to lead to relevant evidence. Without waiving this objection, Mr. Lazar has not done surveys of this type. This question is better directed to Cascade. As long as Cascade reads the meter and prepares the bill, the Customer need only respond to the economic incentives reflected in the bill to produce the expected price response.