

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**CASCADIA WATER, LLC,**

**Respondent.**

**DOCKET UW-240151**

**WATER CONSUMER ADVOCATES OF WASHINGTON, INTERVENOR**

January 23, 2025

**Responsive Exhibit of Blaine C. Gilles**

**Staff Responses to WCAW DRs 1-154**

**Exh. BCG-25**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Mike Young TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 1**

Please identify by name and title each employee of Staff who has participated substantively in Staff's investigation IN THE MATTER OF CASCADIA WATER COMPANY TARIFF REVISIONS, DOCKET UW 240151 (hereinafter "Cascadia rate case").

**RESPONSE:**

Rachel Stark, Regulatory Analyst  
Scott Sevall, Regulatory Analyst  
Mike Young, Senior Regulatory Advisor (former Acting Section Manager)

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**DATA REQUEST NO. 2:**

As to each said employee, please give a short synopsis of their respective role regarding Cascadia.

**RESPONSE:**

Mr. Sevall reviewed cost of capital, capital structure, and rate design, and provided Exhibits SS-1T, SS-2, and SS-3, which were filed in the docket and served on parties on November 20, 2024.

Ms. Stark reviewed operational expenses, assets, the general ledger, and provided Exhibits RS-1T, RS-2, RS-3, RS-4, and RS-5, which were filed in the docket and served on parties on November 20, 2024.

Mr. Young provided assistance to Ms. Stark and Mr. Sevall in reviewing the case, drafting testimony, and negotiating with the company during the informal and now formal process for this filing.

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**DATA REQUEST NO. 3:**

As to each said employee, please produce a summary of their respective educations, expertise in water system regulation, time employed by the UTC in a water system related regulatory position, and each UTC water rate case they have worked on previously.

**RESPONSE:**

Ms. Stark has been employed by the Washington Utilities and Transportation Commission (Commission) since April 25, 1988, with multiple opportunities throughout her employment to participate to learn more about water regulation. Ms. Stark worked in the Consumer Protection section handling consumer complaints, which included water customer complaints. In this role, Ms. Stark investigated consumer complaints, provided consumers, companies, legislators, the governor's office, and other Commission Staff technical assistance on complex issues. Ms. Stark also provided training on relevant portions of the Washington Administrative Code (WAC), Revised Code of Washington (RCW), and company tariffs to new and current employees. Additionally, Ms. Stark was a Public Involvement Coordinator, meaning she would help consumers of regulated companies to understand and provide comments on matters of filing going before the Commission at open meetings. Ms. Stark also received in-house training from Staff member Jim Ward, now retired. She received other in-house training with Mike Young and other peers in the Transportation and Water Section.

Mr. Sevall holds a bachelor's in Business Administration, focused on Accounting, from Washington State University. He attended the National Association of Regulatory Utility Commissioners (NARUC) Utility Rate School in 2015. He has also worked for the Washington Department of Ecology performing various accounting functions from payroll to grant and general accounting. Additionally, he has also worked at the Washington Office of the Insurance Commissioner performing financial risk analysis. Please see Staff's Response to WCAW's Data Request No. 99 for Mr. Sevall's time employed by the UTC.

Mr. Young holds a bachelor's degree in Accounting from Western Washington University and has attended the NARUC sponsored Rate School in 2012, as well as many other regulatory training programs made available to the Commission. Mr. Young has been employed by the Commission since August 2000 and transferred to the Water and

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Transportation Section in January 2012. Mr. Young was the Section Manager for 8 years, and the Assistant Director for Water and Transportation for 2 years. He recently completed an 8-month assignment as Acting Section Manager. In his managerial role, Mr. Young was responsible for the day-to-day operations and Staff assignments, as well as oversight of Commission regulation of water and solid waste companies. Mr. Young has worked on numerous water, transportation, and solid waste rate filings, provided technical assistance to regulated water companies, resolved jurisdictional issues, and led outreach programs specifically for water companies to assist with regulatory matters and business with the Commission. Mr. Young is currently responsible for providing expertise on complex rate issues and training all new staff, as well as assisting current Staff.

Please see Attachment A to this data request for a list of each water case worked on by Staff.

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**DATA REQUEST NO. 4:**

Please identify by name and title any outside professional retained by Staff who has participated substantively in Staff's investigation in this matter.

**RESPONSE:**

Staff did not obtain any outside professionals for this adjudication.

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**DATA REQUEST NO. 5:**

As to each said outside professional, please give a short synopsis of their respective role regarding the Cascadia rate case.

**RESPONSE:**

Not applicable. See Staff Response to WCAW's Data Request No. 4.

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**DATA REQUEST NO. 6:**

As to each said outside professional, please produce a summary of their respective educations, expertise in water system regulation, period retained by the UTC, and each UTC water rate case they have worked on previously.

**RESPONSE:**

Not applicable. See Staff Responses to WCAW's Data Request No. 4 and WCAW's Data Request No. 5.



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**DATA REQUEST NO. 7:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

Please identify any training you have received regarding water system regulation beyond “the National Association of Regulatory Utility Commission’s week-long rate school in October 2022.”

**RESPONSE:**

Please see Staff’s Response to WCAW’s Data Request No. 3.

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**DATA REQUEST NO. 8:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

Do you have any legal training?

**RESPONSE:**

No.

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**DATA REQUEST NO. 9:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

Do you claim to have any expertise in Washington law regarding water system regulation?

**RESPONSE:**

Staff, including Ms. Stark, routinely provides technical assistance to water companies about jurisdictional, rate setting, service provision, and administrative requirements of regulation. Staff is thoroughly familiar with applicable statutes and administrative rules, but Staff does not claim any legal expertise in the practice of law.

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**DATA REQUEST NO. 10:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

If so, please explain in detail those areas for which you claim legal expertise and how you attained said expertise.

**RESPONSE:**

Staff does not claim to have legal expertise.

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**DATA REQUEST NO. 11:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

Do you have any training as an engineer?

**RESPONSE:**

No.

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**DATA REQUEST NO. 12:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

Do you claim to have any expertise in engineering of water systems?

**RESPONSE:**

No. However, Staff works closely with the engineers and planners at the Washington Department of Health.

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**DATA REQUEST NO. 13:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

If so, please explain in detail those areas for which you claim engineering expertise and how you attained said expertise.

**RESPONSE:**

Not applicable. See Staff's Responses to WCAW's Data Request No. 11 and WCAW's Data Request No. 12.

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**DATA REQUEST NO. 14:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

Do you have any training as an economist?

**RESPONSE:**

No.



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**DATA REQUEST NO. 15:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

Do you claim to have any expertise regarding economic issues of water system regulation?

**RESPONSE:**

No. The Commission is an economic regulator of jurisdictional water companies. As part of the job, Staff understands economic issues of water system regulation as it pertains to how the Commission regulates water systems in Washington.

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**DATA REQUEST NO. 16:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

If so, please explain in detail those areas for which you claim economic expertise and how you attained said expertise.

**RESPONSE:**

Not applicable. See Staff's Responses to WCAW's Data Request No. 14 and WCAW's Data Request No. 15.

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**DATA REQUEST NO. 17:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

Do you have any training in business management for a regulated utility?

**RESPONSE:**

No.

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**DATA REQUEST NO. 18:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

Do you claim to have any expertise regarding business management for a regulated utility?

**RESPONSE:**

No.

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**DATA REQUEST NO. 19:**

**Introduction to WCAW DR 7-19:** These data requests incorporate by reference and refer to the TESTIMONY OF RACHEL STARK Exh. RS -1T. It is assumed Ms. Stark will answer these data requests. Please advise if that is not the case.

If so, please explain in detail those areas for which you claim business management expertise and how you attained said expertise.

**RESPONSE:**

Not applicable. See Staff's Responses to WCAW's Data Request No. 17 and WCAW's Data Request No. 18.

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**DATA REQUEST NO. 20:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

List the “test year expenses” you analyzed to determine “whether the Company prudently incurred them”?

**RESPONSE:**

See Direct Testimony of Rachel Stark, Exhibits RS-2 and RS-3.

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**DATA REQUEST NO. 21:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

What was the total amount of “test year expenses” you analyzed to determine “whether the Company prudently incurred them”?

**RESPONSE:**

See Direct Testimony of Rachel Stark, Exhibits RS-2 and RS-3.

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**DATA REQUEST NO. 22:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

Identify each “test year expense” you concluded was prudently incurred, including for each expense: whether it is listed as a “major project” by Cascadia (See CJL 1T, at pp. 9-10), a description of the expense, the total cost of the expense, and when the expense became used and useful.

**RESPONSE:**

In the Direct Testimony of Rachel Stark, Exhibit RS-1T, Ms. Stark discusses the adjustments Staff made to remove imprudent expenses from Cascadia’s filing. Some of those adjustments were made during the informal portion of the case and are described in Exh. RS-1T at 5:14 – 7:21. Some of those adjustments were made after Cascadia’s September 2024 filing and are described in Exh. RS-1T at 8:1 – 13:13.

The remaining expenses were reviewed and deemed prudent. The totals for each category of expenses can be found in Exhibit RS-2 and Exhibit RS-3. In Exhibit RS-2, refer to Tab “PFIS”, Lines 12 through 38; Tab “Input by Entity”, Lines 16 through 72; Tab “Payroll Adjustment”; and Tab “Rate Case Expense”. In Exhibit RS-3, refer to Tab “PFIS”, Lines 12 through 38; Tab “Operating Expense”; and Tab “Rate Case Expense”.

Expenses do not become used and useful. Plant becomes used and useful. Staff assumes that WCAW is asking when the expenses included in Staff’s calculation of rates became known and measurable. Each expense included in Staff’s calculation of rates were known and measurable based on when they were incurred or will be incurred. Each of the expenses will be incurred by the rate effective date.



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Please reference the Companies workpapers to find all expenses proposed in this case.

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**DATA REQUEST NO. 23:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

Did you only analyze “test year expenses” to determine “whether the Company prudently incurred them”?

**RESPONSE:**

Objection. Vague and confusing. Without waiving and subject to the stated objection, Staff responds as follows:

Staff assumes that WCAW is asking whether Staff reviews test year expenses to determine prudence. Yes, Staff reviews test year expenses to determine prudence. Staff reviews invoices and company general ledgers as well as information from the Department of Health. Staff conducted this review during the informal process of this case and continued this review during the formal litigation. Cascadia incorporated some of Staff’s adjustments made during the informal (Open Meeting) phase of this case. See Direct Testimony of Matthew J. Rowell, Exhibit MJR-1T at 6:1-7.

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**DATA REQUEST NO. 24:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

What analysis did you do, if any, regarding non “test year expenses” to determine “whether the Company prudently incurred them”?

**RESPONSE:**

Non-test year expenses requested by a company are addressed through pro forma and restating adjustments. Pro forma and restating adjustments are subject to the same standards as expenses that were incurred during the test year. See Direct Testimony of Rachel Stark, Exhibit RS-1T at 4:6 – 5:10. Staff reviews both non-test year and test-year expenses to determine prudence. Staff reviews invoices and company general ledgers as well as information from the Department of Health.

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**DATA REQUEST NO. 25:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

If you did not analyze whether non “test-year expenses” were prudently incurred by Cascadia, why not?

**RESPONSE:**

Not applicable. See Staff Response to WCAW’s Data Request No. 24.

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**DATA REQUEST NO. 26:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

As to each of Cascadia’s 14 major projects (See CJL 1T, at pp. 9-10), what analysis did you do, if any, to determine “whether the Company prudently incurred them”?

**RESPONSE:**

Staff reviewed invoices related to the “major projects” to determine prudence and the cost of rate base. Staff used the Commission prudence guidelines to determine prudence. The guidance for prudence review can be found in the Direct Testimony of Rachel Stark, Exhibit RS-1T at 4:15-20.

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**DATA REQUEST NO. 27:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

Did you conduct any type of analysis of any of the “major projects” listed by Cascadia to determine whether the expense was appropriate to be included in rates (See CJL 1, at pp. 9-10)? If so, identify each such project, the expense of that project, the analysis you conducted and the conclusions you reached.

**RESPONSE:**

Staff reviewed invoices related to the “major projects” to determine prudence and the cost of rate base. Staff also conducted two site visits to review the work already done and the other infrastructure that were identified as “major projects” to be completed and put into service at a later date. During the site visits, Staff was able to ask questions of the Company regarding major projects, reasons for repair or/vs replacement, and costs and expenses for projects. In addition, Staff had meetings with the Department of Health to discuss their what, if any, requirements DOH has for companies, and the system plan. Furthermore, Staff asked data requests of the Company during the informal process and formal process in addition to a meeting to walk through the Companies work papers. The conclusion Staff reached is that the major projects were reasonable, necessary, and prudent.

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**DATA REQUEST NO. 28:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

What was the total cost claimed by Cascadia for non “test year expenses” which you did not analyze for prudence?

**RESPONSE:**

Objection. Vague and confusing. Without waiving and subject to the stated objection, Staff responds as follows:

Staff assumes that WCAW is asking about investments into assets which are going into service before rates are effective but were not included in the 12 month test year. There were no expenses for which Staff did not analyze for prudence. See Direct Testimony of Rachel Stark, Exhibit RS-1T for Staff’s analysis of prudence in this case. See Staff’s Responses to WCAW’s Data Request No. 24 and WCAW’s Data Request No. 22.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 29:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

What was the total cost claimed by Cascadia for those of its 14 major projects which you did not analyze for prudence?

**RESPONSE:**

Not applicable. There were no projects for which Staff did not analyze for prudence.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 30:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

What was the total cost claimed by Cascadia for those of its 14 major projects which you did not analyze for prudence, which you approved for inclusion in rates?

**RESPONSE:**

Not applicable. There were no projects for which Staff did not analyze for prudence.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 31:**

**Introduction to WCAW DR 20-31:** These data requests incorporate by reference and refer to the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 5.

“Q. What makes an expense appropriate to include in rates?

A. For test-year expenses, Staff largely looks to whether the Company prudently incurred them. Post-test-year expenses that the company seeks to include in rates must be known and measurable, meaning that the expense is not hypothetical and that it is quantifiable.”

These data requests speak to all Staff efforts, not just those of Ms. Stark.

Regardless of Cascadia’s identification of a project as major or minor, what was the total amount of all expenses which you did not analyze for prudence, which you approved for inclusion in rates?

**RESPONSE:**

Not applicable. There were no projects for which Staff did not analyze for prudence.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 32:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”). These data requests speak to all Staff efforts, not just those of Ms. Stark.

For each of Cascadia’s major capital improvements did Staff assess whether the expense was necessary?

**RESPONSE:**

Yes, Staff evaluated Cascadia’s major capital improvements for whether those costs were necessary to the provision of the regulated service.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 33:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

If so, describe in detail how Staff assessed whether the expense was necessary?

**RESPONSE:**

Staff uses Commissions prudence standards; this includes asking if the cost was necessary. Please see Staff Response to WCAW Data Request No. 28.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 34:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please identify all Staff members who assisted substantively in Staff’s assessment whether the expense was necessary?

**RESPONSE:**

Rachel Stark  
Mike Young

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 35:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

“Q. How does Staff determine whether a cost or expense was prudently incurred?

A. Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please identify all documentation produced by Cascadia which Staff deemed relevant in its assessment of whether such expense was necessary.

**RESPONSE:**

System sanitary survey

DOH letter to response of system sanitary survey

Invoices

Company responses to DRs from Staff.

Please also see Staff’s response to data request no. 28.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 36:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please describe all independent investigations Staff conducted during its assessment of whether each such expense was necessary.

**RESPONSE:**

Staff performed a site visit to systems in Sequim area on April 22, 2024, and visited the systems on Whidbey Island on April 23, 2024. During the site visit, Staff was able to observe many of the investments and operations. Staff was able to ask Company representatives about the investments and operations and gained substantial insight into the costs.

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**DATA REQUEST NO. 37:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Did Staff conclude that each of Cascadia’s major capital improvements was necessary?

**RESPONSE:**

Yes.



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STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 38:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

If yes, what were the major reason(s) upon which Staff relied to conclude that each of Cascadia’s major capital improvements was necessary?

**RESPONSE:**

Staff observed the conditions of systems slated for repairs or improvements and observed the newly installed/replaced equipment. Additionally, Staff reviewed the letter from the Department of Health regarding Cascadia’s system sanitary survey.

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STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 39:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

“Q. How does Staff determine whether a cost or expense was prudently incurred?

A. Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please produce all documentation memorializing Staff’s analysis of and conclusion that each of Cascadia’s major capital improvements was necessary.

**RESPONSE:**

Please see Attachment A to this data request, which contains photos from Staff’s site visit.

Please see Attachment B to this data request, which contains a copy of the Sanitary System Survey.

Please see Attachment C to this data request, which DOH response letter to Sanitary System Survey.

Please see Attachment D to this data request, which contains copies of invoices reviewed by Staff.

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STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 40:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

For each of Cascadia’s major capital improvements did Staff assess whether Cascadia “considered alternatives”?

**RESPONSE:**

Yes.

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**DATA REQUEST NO. 41:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

If so, describe in detail how Staff assessed whether Cascadia “considered alternatives” as to each of Cascadia’s major capital improvements.

**RESPONSE:**

During the site visit, Staff asked the Company what alternatives they considered when determining what contractor or company should do the project.

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**DATA REQUEST NO. 42:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please identify all Staff members who assisted substantively in Staff’s assessment of whether Cascadia “considered alternatives”.

**RESPONSE:**

Rachel Stark  
Mike Young

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STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 43:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”). These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please identify all documentation produced by Cascadia which Staff deemed relevant in its assessment of whether Cascadia “considered alternatives” for each of Cascadia’s major capital improvements.

**RESPONSE:**

None.

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**DATA REQUEST NO. 44:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please describe all independent investigations Staff conducted during its assessment of whether Cascadia “considered alternatives” as to each of Cascadia’s major capital improvements.

**RESPONSE:**

Staff requested information, reviewed documentation, conducted a site visit, and reviewed each project to determine whether and how Cascadia considered alternatives. While, the Company was not able to provide documentation, it did provide information and explained its thinking with respect to each project.

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STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 45:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Did Staff conclude that Cascadia adequately “considered alternatives” as to each of Cascadia’s major capital improvements?

**RESPONSE:**

Staff looks at whether Cascadia considered alternatives; however, the judgment regarding whether that consideration was adequate is in the purview of the Department of Health engineers who review the Company’s planned and proposed infrastructure.



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**DATA REQUEST NO. 46:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please produce all documentation memorializing Staff’s assessment of and conclusion that Cascadia adequately “considered alternatives” as to each of Cascadia’s major capital improvements.

**RESPONSE:**

See Staff’s Response to WCAW’s Data Request No. 43.

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**DATA REQUEST NO. 47:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please describe all alternatives Staff concluded Cascadia considered as to each of Cascadia’s major capital improvements, including the nature of the alternative, the cost of the alternative, and the impact such alternative would have on consumer rates.

**RESPONSE:**

See Staff’s Response to WCAW’s Data Request No. 45.

One of the alternatives considered was an underground well versus an above ground well. The advantages of an above ground well outweigh the costs. Underground wells make it harder for the Company to determine leaks in the reservoir and could lose water and reduce fire flow at the same time. For an above ground reservoir the Company can physically see any repairs needed and inspections will be easier to conduct. Additionally, water loss would be physically seen if there is an issue with the above ground reservoir. Staff also considered that, according to DOH for the same reasons just discussed, underground reservoirs are no longer considered the standard.

Other alternatives that Staff considered for various system improvements are listed in Cascadia witness Culley Lehman’s Direct Testimony, Exhibit CJL-1T. Examples are:

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- Del Bay watermain replacement and consolidation with W&B Waterworks No. 1 project. Lehman, Exhibit CJL-1T at 12:1-8
- CAL Waterworks – distribution system loop at Beachwood Drive. Lehman, Exhibit CJL-1T at 13:8-11
- CAL Waterworks – reservoir replacement and booster pump improvements. Lehman, Exhibit CJL-1T at 14:21-23 and 15:1-2
- W&B Waterworks #1 – watermain replacement and PRV vault to Mutiny Lane. Lehman, Exhibit CJL-1T at 16:11-16
- Estates – reservoir, booster pumps, and treatment. Lehman, Exhibit CJL-1T at 21:1-15
- Sea View – source development. Lehman, Exhibit CJL-1T at 24:18-21
- Diamond Point – chlorination system. Lehman, Exhibit CJL-1T at 26:4-10
- Generators – multiple systems. Lehman, Exhibit CJL-1T at 28:19-20 and 29:1-2

Regarding impact on consumer rates, we set rates based on the revenue requirement which is spread across all customers. New or higher costs may result in increased rates. However, it is not only about the cost, Staff reviews for prudence. We do not have a separate analysis for the impact these alternatives could have had on rates.

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**DATA REQUEST NO. 48:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Did Staff conduct any cost-benefit analysis comparing each alternative considered versus the capital improvement Cascadia implemented?

**RESPONSE:**

No. See Staff’s Responses to WCAW’s Data Request No. 45 and WCAW’s Data Request No. 47.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 49:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please produce all documentation memorializing Staff’s assessment of whether Cascadia conducted an adequate cost-benefit analysis as to each of Cascadia’s major capital improvements.

**RESPONSE:**

Not applicable. See Staff’s Response to WCAW’s Data Request No. 48.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 50:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

For each of Cascadia’s major capital improvements did Staff conclude Cascadia adequately documented its decision-making process for later review?

**RESPONSE:**

While Cascadia did not have complete documentation for every decision point, Staff had enough information from the documents provided, discovery, discussions with Company representatives, and the Department of Health to evaluate its decision-making process.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 51:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

“**Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please describe any Staff criticism of Cascadia’s documentation of its decision-making process for each of Cascadia’s major capital improvements?

**RESPONSE:**

In some instances, Cascadia could explain its decision-making process and decision points, but it didn’t document those processes. They were based on individual experience and expertise. While the information was available in this case through interviews and data requests, it would be better for the Company to memorialize its decision-making at the time the decisions were made to allow for later audit of those decisions.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 52:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please identify all Cascadia Water System Plans Staff utilized in assessing each of Cascadia’s major capital improvements.

**RESPONSE:**

Staff used Cascadia’s sanitary system survey for the major capital improvements in this case.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 53:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please identify all Cascadia-generated capital improvement plans Staff utilized in assessing each of Cascadia’s major capital improvements.

**RESPONSE:**

None.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 54:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please identify all Cascadia engineering reports Staff utilized in assessing each of Cascadia’s major capital improvements.

**RESPONSE:**

None.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 55:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Does Staff believe any other factors, other than those identified by Ms. Stark above, should be included by Staff in its analysis of whether a cost or expense was prudently incurred?

**RESPONSE:**

Individual cases may present unique circumstances that may warrant additional factors being considered. This case did not present unique circumstances that required analysis outside of the principles described in Rachel Stark’s Direct Testimony, Exhibit RS-1T.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 56:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please identify all such other factors.

**RESPONSE:**

Not applicable. See Staff’s Response to WCAW’s Data Request No. 55.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 57:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Does Staff believe the impact on customer rates should be included by Staff in its analysis of whether a cost or expense was prudently incurred?

**RESPONSE:**

The regulatory principles that must be met in order for costs and expenses to be included in rates protect customers against bearing imprudent costs and expenses. Staff evaluates costs and expenses against regulatory principles to calculate a revenue requirement, then designs proposed rates. Staff does not disallow costs or expenses solely based on an expenses' rate impact. However, once Staff determines what should be included in rates, based on its analysis, Staff considers the impact on customers and whether mitigation measures are needed during the rate design process.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 58:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Did Staff analyze the impact on customer rates as part of its analysis of whether a cost or expense was prudently incurred?

**RESPONSE:**

The regulatory principles that must be met in order for costs and expenses to be included in rates protect customers against bearing imprudent costs and expenses. Staff evaluates costs and expenses against regulatory principles to calculate a revenue requirement, then designs rates. Staff does not disallow costs or expenses solely based on an expenses' rate impact. However, once Staff determines what should be included in rates, based on its analysis, Staff considers the impact on customers and whether mitigation measures are needed during the rate design process.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 59:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Does Staff believe the history of prior customer rates and rate increases should be included by Staff in its analysis of whether a cost or expense was prudently incurred?

**RESPONSE:**

The regulatory principles that must be met in order for costs and expenses to be included in rates protect customers against bearing imprudent costs and expenses. Staff evaluates costs and expenses against regulatory principles to calculate a revenue requirement, then designs rates. Staff does not disallow costs or expenses solely based on a company’s history of rates or rate increases. However, once Staff determines what should be included in rates, based on its analysis, Staff considers the impact on customers, gradualism, rate stability, and whether mitigation measures are needed.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 60:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Did Staff analyze the history of prior customer rates and rate increases in its analysis of whether a cost or expense was prudently incurred?

**RESPONSE:**

No. Staff bases its review of each rate case on test year costs and restating and pro forma adjustments. Ratemaking is a forward-looking process. However, Staff does review how significant a rate increase is in every case. If mitigation measures are needed to address customer impact, Staff evaluates how to implement such measures. In this case, the resulting rate increase will be large. The size of the increase requires mitigation, and Staff applied a phase in proposal to its revenue requirement calculation. See Direct Testimony of Scott Sevall, Exhibit SS-1T at 16:9 – 17:20.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 61:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please produce all documentation memorializing Staff’s analysis of historical and requested customer rates in the context of whether a cost or expense was prudently incurred.

**RESPONSE:**

Attached to this data request are copies of the tariffs for Aquarius Utilities (Attachment A), Cascadia Water, LLC, (Attachment B), Northwest Water Service, Inc. (Attachment C), Pedersen Family, LLC, (Attachment D), and Pelican Point (Attachment E).

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 62:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

As to any other factors identified in your response to WCAW DR 43, please produce all documentation memorializing Staff’s analysis of said factors in the context of whether a cost or expense was prudently incurred.

**RESPONSE:**

Not applicable. Staff assumes that this request errs in referring to WCAW Data Request No. 43, and instead was intended to refer to WCAW Data Request No. 55. Staff did not identify any additional factors relevant to prudence in this case. See Staff Responses to WCAW Data Request No. 55 and WCAW Data Request No. 56.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 63:**

**Introduction to WCAC DR 32-64.** These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

**“Q.** How does Staff determine whether a cost or expense was prudently incurred?

**A.** Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please produce all Staff documentation not produced previously which memorializes its analysis of whether a cost or expense was prudently incurred.

**RESPONSE:**

Staff has no other documentation not already provided.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 64:**

**Introduction to WCAW DR 64-71:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT DUREN Exh. SD 1CT, (hereinafter “Duren Testimony”).

Has Staff reviewed the Duren Testimony?

**RESPONSE:**

Yes.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 65:**

**Introduction to WCAW DR 64-71:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT DUREN Exh. SD 1CT, (hereinafter “Duren Testimony”).

Has Staff formed an opinion whether Mr. Duren has the expertise to give those opinions stated in the Duren Testimony?

**RESPONSE:**

Objection. Irrelevant. Without waiving and subject to the stated objection, Staff responds as follows:

Yes.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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**DATA REQUEST NO. 66:**

**Introduction to WCAW DR 64-71:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT DUREN Exh. SD 1CT, (hereinafter “Duren Testimony”).

If so, what opinions has Staff formed as to whether Mr. Duren has the expertise to give the Duren Testimony?

**RESPONSE:**

Objection. Irrelevant. Without waiving and subject to the stated objection, Staff responds as follows:

Staff reviewed Mr. Duren’s professional qualifications, and Staff’s opinion is that Mr. Duren’s experience as an engineer makes him an expert.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Lisa Gafken, AAG TELEPHONE: 206-714-3551
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**DATA REQUEST NO. 67:**

**Introduction to WCAW DR 64-71:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT DUREN Exh. SD 1CT, (hereinafter “Duren Testimony”).

Does Staff disagree with any of the conclusions voiced by Mr. Duren in the Duren Testimony?

**RESPONSE:**

Objection. This data request seeks information, to the extent any exists, protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery. Further, Staff objects to this request as unnecessary and unduly burdensome pursuant to WAC 480-07-400(3). This request has been made in advance of the filing of Staff’s cross-answering testimony, exhibits, and work papers, which necessarily provide the information sought.

Without waiving and subject to the above objections, Staff responds as follows:

Staff will file its testimony pursuant to the case schedule ordered by the Commission in this matter.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Lisa Gafken, AAG TELEPHONE: 206-714-3551
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**DATA REQUEST NO. 68:**

**Introduction to WCAW DR 64-71:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT DUREN Exh. SD 1CT, (hereinafter “Duren Testimony”).

Please identify specifically, with reference to page and line numbers, each of the conclusions voiced by Mr. Duren in the Duren Testimony with which Staff disagrees.

**RESPONSE:**

Objection. This data request seeks information, to the extent any exists, protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery. Further, Staff objects to this request as unnecessary and unduly burdensome pursuant to WAC 480-07-400(3). This request has been made in advance of the filing of Staff’s cross-answering testimony, exhibits, and work papers, which necessarily provide the information sought.

Without waiving and subject to the above objections, Staff responds as follows:

Staff will file its testimony pursuant to the case schedule ordered by the Commission in this matter.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Lisa Gafken, AAG TELEPHONE: 206-714-3551
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**DATA REQUEST NO. 69:**

**Introduction to WCAW DR 64-71:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT DUREN Exh. SD 1CT, (hereinafter “Duren Testimony”).

Please explain in detail why Staff disagrees with each of the conclusions identified above.

**RESPONSE:**

Objection. This data request seeks information, to the extent any exists, protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery. Further, Staff objects to this request as unnecessary and unduly burdensome pursuant to WAC 480-07-400(3). This request has been made in advance of the filing of Staff’s cross-answering testimony, exhibits, and work papers, which necessarily provide the information sought.

Without waiving and subject to the above objections, Staff responds as follows:

Staff will file its testimony pursuant to the case schedule ordered by the Commission in this matter.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Lisa Gafken, AAG TELEPHONE: 206-714-3551
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**DATA REQUEST NO. 70:**

**Introduction to WCAW DR 64-71:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT DUREN Exh. SD 1CT, (hereinafter “Duren Testimony”).

Has Staff generated any documentation summarizing, critiquing, analyzing or otherwise reviewing the Duren Testimony?

**RESPONSE:**

Objection. This data request seeks information, to the extent any exists, protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery. Further, Staff objects to this request as unnecessary and unduly burdensome pursuant to WAC 480-07-400(3). This request has been made in advance of the filing of Staff’s cross-answering testimony, exhibits, and work papers, which necessarily provide the information sought.

Without waiving and subject to the above objections, Staff responds as follows:

Staff will file its testimony pursuant to the case schedule ordered by the Commission in this matter.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Lisa Gafken, AAG TELEPHONE: 206-714-3551
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**DATA REQUEST NO. 71:**

**Introduction to WCAW DR 64-71:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT DUREN Exh. SD 1CT, (hereinafter “Duren Testimony”).

If so, please produce all such documentation.

**RESPONSE:**

Objection. This data request seeks information, to the extent any exists, protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery. Further, Staff objects to this request as unnecessary and unduly burdensome pursuant to WAC 480-07-400(3). This request has been made in advance of the filing of Staff’s cross-answering testimony, exhibits, and work papers, which necessarily provide the information sought.

Without waiving and subject to the above objections, Staff responds as follows:

Staff will file its testimony pursuant to the case schedule ordered by the Commission in this matter.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Rachel Stark Scott Sevall RESPONDER: Rachel Stark Scott Sevall TELEPHONE: 360-664-1272 360-664-1245
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**DATA REQUEST NO. 72:**

**Introduction to WCAW DR 72-79:** These data requests incorporate by reference and refer to the TESTIMONY OF BLAINE GILLES Exh. BCG 1T, Sections IV, V, VI and VII (hereinafter “Gilles Testimony”).

Has Staff reviewed the Gilles Testimony?

**RESPONSE:**

Yes.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Rachel Stark Scott Sevall RESPONDER: Rachel Stark Scott Sevall TELEPHONE: 360-664-1272 360-664-1245
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**DATA REQUEST NO. 73:**

**Introduction to WCAW DR 72-79:** These data requests incorporate by reference and refer to the TESTIMONY OF BLAINE GILLES Exh. BCG 1T, Sections IV, V, VI and VII (hereinafter “Gilles Testimony”).

Has Staff formed an opinion whether Mr. Gilles has the expertise to give those opinions stated in the Gilles Testimony?

**RESPONSE:**

Objection. Irrelevant. Without waiving and subject to the stated objection, Staff responds as follows:

Yes.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Rachel Stark Scott Sevall RESPONDER: Rachel Stark Scott Sevall TELEPHONE: 360-664-1272 360-664-1245
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**DATA REQUEST NO. 74:**

**Introduction to WCAW DR 72-79:** These data requests incorporate by reference and refer to the TESTIMONY OF BLAINE GILLES Exh. BCG 1T, Sections IV, V, VI and VII (hereinafter “Gilles Testimony”).

If so, what opinions has Staff formed as to whether Mr. Gilles has the expertise to give the Gilles Testimony?

**RESPONSE:**

Objection. Irrelevant. Without waiving and subject to the stated objection, Staff responds as follows:

Staff reviewed Mr. Gilles’s professional qualifications, and Staff’s opinion is that Mr. Gilles’s education and experience with regulatory economics makes him an expert.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Rachel Stark Scott Sevall RESPONDER: Lisa Gafken, AAG TELEPHONE: 206-714-3551
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**DATA REQUEST NO. 75:**

**Introduction to WCAW DR 72-79:** These data requests incorporate by reference and refer to the TESTIMONY OF BLAINE GILLES Exh. BCG 1T, Sections IV, V, VI and VII (hereinafter “Gilles Testimony”).

Does Staff disagree with any of the conclusions voiced by Mr. Gilles in the Gilles Testimony?

**RESPONSE:**

Objection. This data request seeks information, to the extent any exists, protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery. Further, Staff objects to this request as unnecessary and unduly burdensome pursuant to WAC 480-07-400(3). This request has been made in advance of the filing of Staff’s cross-answering testimony, exhibits, and work papers, which necessarily provide the information sought.

Without waiving and subject to the above objections, Staff responds as follows:

Staff will file its testimony pursuant to the case schedule ordered by the Commission in this matter.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Rachel Stark Scott Sevall RESPONDER: Lisa Gafken, AAG TELEPHONE: 206-714-3551
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**DATA REQUEST NO. 76:**

**Introduction to WCAW DR 72-79:** These data requests incorporate by reference and refer to the TESTIMONY OF BLAINE GILLES Exh. BCG 1T, Sections IV, V, VI and VII (hereinafter “Gilles Testimony”).

Please identify specifically, with reference to page and line numbers, each of the conclusions voiced by Mr. Gilles in the Gilles Testimony with which Staff disagrees.

**RESPONSE:**

Objection. This data request seeks information, to the extent any exists, protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery. Further, Staff objects to this request as unnecessary and unduly burdensome pursuant to WAC 480-07-400(3). This request has been made in advance of the filing of Staff’s cross-answering testimony, exhibits, and work papers, which necessarily provide the information sought.

Without waiving and subject to the above objections, Staff responds as follows:

Staff will file its testimony pursuant to the case schedule ordered by the Commission in this matter.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Rachel Stark Scott Sevall RESPONDER: Lisa Gafken, AAG TELEPHONE: 206-714-3551
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**DATA REQUEST NO. 77:**

**Introduction to WCAW DR 72-79:** These data requests incorporate by reference and refer to the TESTIMONY OF BLAINE GILLES Exh. BCG 1T, Sections IV, V, VI and VII (hereinafter “Gilles Testimony”).

Please explain in detail why Staff disagrees with each of the conclusions identified above.

**RESPONSE:**

Objection. This data request seeks information, to the extent any exists, protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery. Further, Staff objects to this request as unnecessary and unduly burdensome pursuant to WAC 480-07-400(3). This request has been made in advance of the filing of Staff’s cross-answering testimony, exhibits, and work papers, which necessarily provide the information sought.

Without waiving and subject to the above objections, Staff responds as follows:

Staff will file its testimony pursuant to the case schedule ordered by the Commission in this matter.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Rachel Stark Scott Sevall RESPONDER: Lisa Gafken, AAG TELEPHONE: 206-714-3551
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**DATA REQUEST NO. 78:**

**Introduction to WCAW DR 72-79:** These data requests incorporate by reference and refer to the TESTIMONY OF BLAINE GILLES Exh. BCG 1T, Sections IV, V, VI and VII (hereinafter “Gilles Testimony”).

Has Staff generated any documentation summarizing, critiquing, analyzing or otherwise reviewing the Gilles Testimony?

**RESPONSE:**

Objection. This data request seeks information, to the extent any exists, protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery. Further, Staff objects to this request as unnecessary and unduly burdensome pursuant to WAC 480-07-400(3). This request has been made in advance of the filing of Staff’s cross-answering testimony, exhibits, and work papers, which necessarily provide the information sought.

Without waiving and subject to the above objections, Staff responds as follows:

Staff will file its testimony pursuant to the case schedule ordered by the Commission in this matter.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Rachel Stark Scott Sevall RESPONDER: Lisa Gafken, AAG TELEPHONE: 206-714-3551
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**DATA REQUEST NO. 79:**

**Introduction to WCAW DR 72-79:** These data requests incorporate by reference and refer to the TESTIMONY OF BLAINE GILLES Exh. BCG 1T, Sections IV, V, VI and VII (hereinafter “Gilles Testimony”).

If so, please produce all such documentation.

**RESPONSE:**

Objection. This data request seeks information, to the extent any exists, protected by the work product doctrine. Additionally, this data request seeks information that is outside the scope of discovery. Further, Staff objects to this request as unnecessary and unduly burdensome pursuant to WAC 480-07-400(3). This request has been made in advance of the filing of Staff’s cross-answering testimony, exhibits, and work papers, which necessarily provide the information sought.

Without waiving and subject to the above objections, Staff responds as follows:

Staff will file its testimony pursuant to the case schedule ordered by the Commission in this matter.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 80:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

Do you concur with defining the term “rate shock” as it applies to water rate cases such as this one to be “an adverse, unreasonable impact on consumers of increases in water rates”?

**RESPONSE:**

No.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 81:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

If not, please define your understanding of the term “rate shock” as it applies to water rate cases. It will be assumed you are using your definition of “rate shock” in your responses, unless you state otherwise.

**RESPONSE:**

Staff defines rate shock as a large rate increase. There is no specific amount that constitutes rate shock, as the amount that constitutes rate shock can vary from case to case.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 82:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

Do you have a working definition of the percentage increase in consumer rates that constitutes “rate shock”? If so, what is it?

**RESPONSE:**

See Staff Response to WCAW’s Data Request No. 81.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 83:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

Does the UTC have a responsibility to protect consumers from “rate shock” in water rate cases such as this case?

**RESPONSE:**

It is important to note that Staff operates as a party before the Commission in adjudicatory proceedings. There is an ex parte wall that exists between parties and the decision-making arm of the Commission, which consists of the three Commissioners and the presiding Administrative Law Judge. Staff responds to this data request from its own perspective and not that of the Commission.

As a party, Staff has an obligation to review company filings and all other evidence presented in the case. Staff’s role is to analyze filings and other evidence to recommend rates that are fair, just, reasonable, and sufficient. There is no obligation to avoid rate shock, but Staff does consider whether mitigation measures are needed to help customers in cases where large rate increases are justified.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 84:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

If your answer to WCAC DR 83 is “no” what role, if any, do you believe the UTC has regarding potential “rate shock” in water rate cases such as this case?

**RESPONSE:**

See Staff Response to WCAW’s Data Request No. 83.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 85:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff's analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the "prudence" of a capital improvement.

Do you have a responsibility as the Staff of the UTC to evaluate potential "rate shock" in water rate cases such as this case?

**RESPONSE:**

No. See Staff's Response to WCAW's Data Request No. 83.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 86:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

If imposed, would the rate increases proposed by Cascadia herein constitute “rate shock” in your opinion?

**RESPONSE:**

Yes, the rates Cascadia initially proposed results in rate shock. The resulting rates from this case are likely going to be high, based on the level of investment made by the Company.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 87:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

Describe all steps you took, if any, to evaluate “rate shock” in this case.

**RESPONSE:**

1. Staff analyzed the case and request.
2. Staff made restating and proforma adjustments.
3. Staff reviewed the Revenue Requirement and increase.
4. Staff deemed that the increase was high and to mitigate “rate shock” a phased in approach is necessary.

See the testimony and exhibits filed by Staff witnesses Rachel Stark and Scott Sevall, which contains Staff’s analysis in this case. Exhibits RS-1T, RS-2, RS-3, RS-4, RS-5, RS-6, SS-1T, SS-2, and SS-3.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 88:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

Please produce all documents which memorialize the steps you took to evaluate “rate shock” in this case.

**RESPONSE:**

Other than what is contained in the testimony and exhibits filed by Staff witnesses Rachel Stark and Scott Sevall, there are no additional documents which memorialize Staff’s evaluation of rate shock. See Exhibits RS-1T, RS-2, RS-3, RS-4, RS-5, RS-6, SS-1T, SS-2, and SS-3.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 89:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

Do you have an opinion what percentage rate increase would be reasonable and not constitute rate shock herein? If so, what is your opinion?

**RESPONSE:**

No. Each case must be evaluated on its own facts and circumstances. Staff’s analysis in this case results in a recommendation based on and supported by evidence and that complies with long-standing regulatory principles. Because Staff recognizes that the rate increase from this case will be substantial, it recommends a phase in to mitigate the impact on customers. Staff believes that its analysis produces fair, just, reasonable, and sufficient rates and that the phase in proposal balances the interests of the Company and the customers.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 90:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff's analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the "prudence" of a capital improvement.

Did you determine that a phase in mechanism would help alleviate rate shock herein?

**RESPONSE:**

Yes.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 91:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff's analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the "prudence" of a capital improvement.

If so, what type of phase in mechanism do you believe would effectively alleviate rate shock?

**RESPONSE:**

Staff proposes a two-phase phase-in over two years. The first 50 percent of the rate increase would go into effect in Year 1 and the second 50 percent of the rate increase would go into effect in Year 2. Staff also recommends carrying costs to compensate the Company for deferring collection of revenue. See Direct Testimony of Scott Sevall, Exhibit SS-1T at 16:9 – 17:20.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 92:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff's analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the "prudence" of a capital improvement.

Please produce all documentation you generated analyzing various phase-in mechanisms.

**RESPONSE:**

See Direct Testimony of Rachel Stark, Exhibits RS-2 and RS-3.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 93:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

What impact on rates would result from the phase-in mechanism you recommend?

**RESPONSE:**

See Direct Testimony of Scott Sevall, Exhibit SS-1T at 17:22 – 19:2.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 94:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

Please produce all documentation you generated analyzing the impact on rates which would result from the phase-in mechanism you recommend.

**RESPONSE:**

See Direct Testimony of Scott Sevall, Exhibit SS-1T at 17:22 – 19:2; Direct Testimony of Rachel Stark, Exhibits RS-2 and RS-3.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 95:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

Do you recommend imposition of carrying costs as part of your phase-in mechanism? If so, why? What impact do carrying costs have on alleviating “rate shock”?

**RESPONSE:**

Yes. See Direct Testimony of Scott Sevall, Exhibit SS-1T at 17:1-20. Carrying costs are a component of implementing a phased in plan for rates. That is part of the balancing of interests.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 96:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff's analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the "prudence" of a capital improvement.

Please produce all documentation you generated analyzing the impact carrying costs have on alleviating "rate shock".

**RESPONSE:**

Staff does not have any documentation on the impact of carrying costs to alleviate "rate shock".

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 97:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

What impact does the amount of capital improvements claimed by Cascadia herein have on “rate shock”?

**RESPONSE:**

Capital improvements are a driving factor in this case, which increased the revenue required to operate.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 98:**

**Introduction to WCAW DR 80-98:** These data requests deal with Staff’s analysis of the impact of increases of water rates on consumers herein, regardless whether it was part of an analysis of the “prudence” of a capital improvement.

In your opinion can the amount of capital improvements claimed by Cascadia herein be awarded without causing “rate shock”? If not, is the amount of capital improvements claimed by Cascadia herein imprudent?

**RESPONSE:**

No, because any large increase could be considered “rate shock”. Staff uses Commission prudence standards when reviewing all costs associated with a general rate case to ensure that customers are not paying for imprudent costs.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 99:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

For what period have you been employed by the Washington Utilities and Transportation Commission (Commission) as a Regulatory Analyst in the Water and Transportation section?

**RESPONSE:**

Mr. Sevall has worked as a Regulatory Analyst in Water and Transportation from August 2014 to July 2022 and from March 2024 to present.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 100:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Please identify any training you have received regarding water system regulation beyond the National Association of Regulatory Utility Commissioners (NARUC) Utility Rate School in 2015?

**RESPONSE:**

None.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 101:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years. Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Do you have any legal training?

**RESPONSE:**

No.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 102:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Do you claim to have any expertise in Washington law regarding water system regulation?

**RESPONSE:**

Staff, including Mr. Sevall, routinely provides technical assistance to water companies about jurisdictional, rate setting, service provision, and administrative requirements of regulation. Staff is thoroughly familiar with applicable statutes and administrative rules, but Staff does not claim any legal expertise in the practice of law.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 103:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years. Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

If so, please explain in detail those areas for which you claim legal expertise and how you attained said expertise.

**RESPONSE:**

Staff does not claim to have legal expertise.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 104:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years. Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Do you have any training as an engineer?

**RESPONSE:**

No.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 105:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years. Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Do you claim to have any expertise in engineering of water systems?

**RESPONSE:**

No. However, Staff works closely with the engineers and planners at the Washington Department of Health.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 106:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

If so, please explain in detail those areas for which you claim engineering expertise and how you attained said expertise.

**RESPONSE:**

Not applicable. See Staff's Responses to WCAW's Data Request No. 104 and WCAW's Data Request No. 105.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW	WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 107:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years. Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Do you have any training as an economist?

**RESPONSE:**

No.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 108:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Do you claim to have any expertise regarding economic issues of water system regulation?

**RESPONSE:**

Yes, I have worked in water regulation for 8 years, during which I have developed expertise in matters of water regulation. I however have not had specific training on economic issues in water system regulation other than from NARUC.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 109:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

If so, please explain in detail those areas for which you claim economic expertise and how you attained said expertise.

**RESPONSE:**

Not applicable. See Staff's Responses to WCAW's Data Request No. 107 and WCAW's Data Request No. 108.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 110:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years. Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Do you have any training in business management for a regulated utility?

**RESPONSE:**

No.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
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**DATA REQUEST NO. 111:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years. Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Do you claim to have any expertise regarding business management for a regulated utility?

**RESPONSE:**

No.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 112:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

If so, please explain in detail those areas for which you claim business management expertise and how you attained said expertise.

**RESPONSE:**

Not applicable. See Staff's Responses to WCAW's Data Request No. 110 and WCAW's Data Request No. 111.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 113:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years. Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Please identify all water rate cases in which you have offered testimony.

**RESPONSE:**

Not applicable, this is the first adjudication for a water company for which Mr. Sevall has written testimony. For informal cases for which Mr. Sevall has had input, see Staff's Response to WCAW's Data Request No. 3.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 114:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years. Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Please produce all testimony you have given in water rate cases

**RESPONSE:**

Not applicable. See Staff Response to WCAW's Data Request No. 113.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 115:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years. Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Please identify all water rate cases in which you have assisted in the preparation of a Staff recommendation.

**RESPONSE:**

Please see Staff's Response to WCAW's Data Request No. 3.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 116:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

Data requests WCAW DR 99-116 speak to Mr. Sevall's background and expertise.

Please produce all Staff recommendations you have assisted in preparing in water rate cases

**RESPONSE:**

Objection. Overly broad and unduly burdensome. Requests information not likely to produce admissible evidence and information that is readily available through public sources. Without waiving and subject to the stated objections, Staff responds as follows:

Please see Staff's Response to WCAW's Data Request No. 3, Attachment A. The dockets for which Mr. Sevall provided input are identified in that Attachment. By navigating to the Commission's website (<https://www.utc.wa.gov/>) and searching using the "Dockets Search" function, you will find Staff memos in which recommendations are described in each of the dockets Mr. Sevall worked on.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 117:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

Is the Aquarius surcharge based upon a loan for improvements of the Aquarius water system?

**RESPONSE:**

Yes.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 118:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

Please explain the "Aquarius surcharge", including how the surcharge came into being, when it came into being, what it was used for, the original loan amount, the current loan balance, who has been assessed the surcharge, whether the surcharge is applied equally to all Aquarius customers or, if not, how it is applied, and whether Aquarius customers voluntarily entered into this loan.

**RESPONSE:**

See Docket UW-160337 Order 01, which is accessible here:

<https://apiproxy.utc.wa.gov/cases/GetDocument?docID=17&year=2016&docketNumber=160337>.

See also, Direct Testimony of Rachel Stark, Exhibit RS-1T at 16:1-21.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Scott Sevall RESPONDER: Scott Sevall TELEPHONE: 360-664-1245
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**DATA REQUEST NO. 119:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

Do you agree Cascadia did not request that the Aquarius surcharge be included in a single tariff rate design?

**RESPONSE:**

Yes.

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STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 120:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

Has any Aquarius customer ever requested that the surcharge be included in a single tariff rate design?

**RESPONSE:**

No, not to Staff's knowledge.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
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**DATA REQUEST NO. 121:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

In the absence of any request by Cascadia or Aquarius customers that the surcharge be included in a single tariff rate design, what caused you to do so?

**RESPONSE:**

RCW 80.28.020 requires fair, just, reasonable rates that are not discriminatory or preferential. As Staff witness Rachel Stark testified, Aquarius customers would be harmed if the surcharge continues because they would pay for the costs of capital improvements across other water systems while those other water systems bear no similar contribution to the Aquarius capital improvements. Exhibit RS-1T at 16:12-21.

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**DATA REQUEST NO. 122:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

Setting Pelican customers aside, will the addition of the Aquarius surcharge to your proposed rate base increase rates for all customers other than Aquarius customers?

**RESPONSE:**

No. Cascadia's proposal allocated rate base from other systems into the Aquarius rates. Under that scenario, maintaining the surcharge is inequitable. Either Aquarius is held out completely, or they are added completely. It is inappropriate to have Aquarius pay for other systems while not receiving the same benefit. If the surcharge is maintained, then Aquarius should be completely removed from consolidated rates and placed in its own tariff schedule. This removal would include their impact across all components of ratemaking, including on the cost of capital.

Furthermore, the impact that Aquarius has on the cost of debt is significant. The cost of debt with Aquarius included is 3.17%, but the cost of debt increases to 6.04 with Aquarius removed. Given the investment level in Cascadia's proposal, this increased cost of debt would have significant impacts on customers if Aquarius was removed. The table below estimates the impacts.

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Island and Peninsula additional revenue per Exh. RS-2	\$ 1,333,793
Number of customers including Aquarius	\$ 3,398
Average additional annual revenue per customer	\$ 393
Island and Peninsula additional annual revenue with Aquarius completely removed	\$ 1,377,773
Number of customers excluding Aquarius	\$ 2,420
Average additional annual revenue per customer	\$ 569

The above illustrates economies of scale. Ultimately, maintaining the surcharge will cost non-Aquarius customers more.

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**DATA REQUEST NO. 123:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

How much will the addition of the Aquarius surcharge to your proposed rate base increase rates for all customers other than Aquarius customers?

**RESPONSE:**

Please see Staff's Response to WCAW's Data Request No. 122.



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STAFF RESPONSE TO DATA REQUEST

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**DATA REQUEST NO. 124:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

Will the addition of the Aquarius surcharge to your proposed rate base contribute to rate shock for all customers other than Aquarius customers?

**RESPONSE:**

Please see Staff's Response to WCAW's Data Request No. 122.

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**DATA REQUEST NO. 125:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade’s [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia’s Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff’s recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

Mr. Sevall speaks to the concept of a “taking” with respect to carrying costs. If Staff believes itself qualified to answer, does the addition of the Aquarius surcharge to your proposed rate base constitute a “taking” from any customer that did not voluntarily agree to the Aquarius loan agreement? If you do not believe yourself qualified to answer please say so.

**RESPONSE:**

Mr. Sevall is not a lawyer, and does not discuss the concept of taking with respect to the Aquarius surcharge. Based on Mr. Sevall’s understanding of “taking,” removing the surcharge and including the costs of the Aquarius capital improvements in general rates does not result in a taking. See Staff’s Response to WCAW’s Data Request No. 122, which shows that Staff’s treatment of the Aquarius surcharge provides benefits to all customers, including customers outside of the Aquarius water system.

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**DATA REQUEST NO. 126:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

If the Aquarius surcharge remained the obligation of Aquarius customers how much would the additional revenue you propose be reduced?

**RESPONSE:**

Please see Staff's Response to WCAW's Data Request No. 122.

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**DATA REQUEST NO. 127:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

If the Aquarius surcharge remained the obligation of Aquarius customers how much would the rates you propose be reduced?

**RESPONSE:**

Please see Staff's Response to WCAW's Data Request No. 122.

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**DATA REQUEST NO. 128:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 117-128:** These data requests speak to Staff's recommendation regarding the Aquarius surcharge:

Q. Does your rate design proposal address these issues?

A. Yes. First, Staff witness Rachel Stark made an adjustment to the Company asset listing removing the Aquarius surcharge, so my rate design proposal cancels that surcharge.

Please produce all documentation memorializing your analyses and calculations related to the Aquarius surcharge.

**RESPONSE:**

Please see Direct Testimony of Rachel Stark, Exhibit RS-1T at 16:1-21, Exhibit RS-2, and Exhibit RS-5.

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**DATA REQUEST NO. 129:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 129-141:** These data requests relate to your recommendation to meld the Island and Peninsula rates into a single rate, and the following TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 14-15:

Q. Why is a single tariff rate for Island and Peninsula appropriate?

A. I understand that Cascadia did not propose a single tariff rate for Island and Peninsula to limit the issues being litigated. However, the tariff issues need to be addressed. The Commission has historically set water rates through a single tariff rate. One reason for this is that the Commission cannot set discriminatory rates. fn16 RCW 80.28.020.

Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

What is Staff's working definition of "cost causation" insofar as it applies to water rate cases?

**RESPONSE:**

Cost causation is the concept of when an entity causes costs not covered by general rates.

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**DATA REQUEST NO. 130:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 129-141:** These data requests relate to your recommendation to meld the Island and Peninsula rates into a single rate, and the following TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 14-15:

Q. Why is a single tariff rate for Island and Peninsula appropriate?

A. I understand that Cascadia did not propose a single tariff rate for Island and Peninsula to limit the issues being litigated. However, the tariff issues need to be addressed. The Commission has historically set water rates through a single tariff rate. One reason for this is that the Commission cannot set discriminatory rates. fn16 RCW 80.28.020.

Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

Did Staff analyze "cost causation" insofar as it applies herein?

**RESPONSE:**

No. This case involves the cost for general service. In this case, the general service is providing water, and the rates being determined is general rates to provide water service. Other services that are not included in general rates, including service visits, back flow testing, and insufficient funds are shown in separate schedules (Schedule X).

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**DATA REQUEST NO. 131:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade’s [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia’s Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 129-141:** These data requests relate to your recommendation to meld the Island and Peninsula rates into a single rate, and the following TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 14-15:

Q. Why is a single tariff rate for Island and Peninsula appropriate?

A. I understand that Cascadia did not propose a single tariff rate for Island and Peninsula to limit the issues being litigated. However, the tariff issues need to be addressed. The Commission has historically set water rates through a single tariff rate. One reason for this is that the Commission cannot set discriminatory rates. fn16 RCW 80.28.020.

Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

Please produce all documentation memorializing Staff’s analysis of “cost causation” insofar as it applies herein.

**RESPONSE:**

The testimony and exhibits filed by Staff witnesses Rachel Stark and Scott Sevall contain the entirety of Staff’s analysis of cost causation. See Exhibits RS-1T, RS-2, RS-3, RS-4, RS-5, RS-6, SS-1T, SS-2, and SS-3.

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**DATA REQUEST NO. 132:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade’s [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia’s Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 129-141:** These data requests relate to your recommendation to meld the Island and Peninsula rates into a single rate, and the following TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 14-15:

Q. Why is a single tariff rate for Island and Peninsula appropriate?

A. I understand that Cascadia did not propose a single tariff rate for Island and Peninsula to limit the issues being litigated. However, the tariff issues need to be addressed. The Commission has historically set water rates through a single tariff rate. One reason for this is that the Commission cannot set discriminatory rates. fn16 RCW 80.28.020.

Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

Do you agree that the vast majority of costs claimed by Cascadia herein only benefit the customers of the specific water system where the improvements were made?

**RESPONSE:**

No. The term “costs” is broad. For example, there are operational costs, costs of capital, costs of assets. Many of these costs benefit customers when shared. See Staff’s Response to WCAW’s Data Request No. 122.

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**DATA REQUEST NO. 133:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 129-141:** These data requests relate to your recommendation to meld the Island and Peninsula rates into a single rate, and the following TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 14-15:

Q. Why is a single tariff rate for Island and Peninsula appropriate?

A. I understand that Cascadia did not propose a single tariff rate for Island and Peninsula to limit the issues being litigated. However, the tariff issues need to be addressed. The Commission has historically set water rates through a single tariff rate. One reason for this is that the Commission cannot set discriminatory rates. fn16 RCW 80.28.020.

Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

If not, please list all costs claimed by Cascadia herein that benefit the customers of the water systems other than that where the improvements were made.

**RESPONSE:**

See Staff's Response to WCAW's Data Request No. 122 for an example of how including costs can benefit customers outside of a particular water system. Staff assumes that this question refers to capital improvements and not all operating expenses. When all costs are

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viewed as a whole, there is a benefit. It would be inappropriate to have one system share their system's cost of capital, while paying for other systems' rate base and all of the rate base associated with their own system's rate base. This is the result of maintaining the Aquarius surcharge. This data request asks for an analysis that is not conducted in rate setting as it is geared to evaluating only the singular costs associated with rate base recovery, and goes beyond the scope of my testimony.

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**DATA REQUEST NO. 134:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

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Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

What is Staff's working definition of "economies of scale" insofar as it applies to water rate cases?

**RESPONSE:**

Spreading the cost of production over a larger number of customers results in a lower overall cost per customer. However, this is outside the scope of Staff's testimony.

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**DATA REQUEST NO. 135:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade’s [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia’s Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

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Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

Did Staff analyze “economies of scale” insofar as it applies herein?

**RESPONSE:**

No. The testimony and exhibits filed by Staff witnesses Rachel Stark and Scott Sevall contain the entirety of Staff’s analysis. See Exhibits RS-1T, RS-2, RS-3, RS-4, RS-5, RS-6, SS-1T, SS-2, and SS-3.



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**DATA REQUEST NO. 136:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade’s [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia’s Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

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Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

Do you agree that the vast majority of costs claimed by Cascadia herein only benefit the customers of the specific water system where improvements were made and do not meet the definition of “economies of scale”?

**RESPONSE:**

No. The cost of new assets is not the only costs involved in rate setting. See Staff’s Responses to WCAW’s Data Request No. 122 and WCAW’s Data Request No. 132.

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**DATA REQUEST NO. 137:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

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Q. Why is a single tariff rate for Island and Peninsula appropriate?

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Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

If you disagree, please list all of Cascadia's 14 major projects that benefit customers other than those of the water system where improvements were made.

**RESPONSE:**

The request asks for an analysis that is not conducted in rate setting and goes beyond the scope of my testimony. If the premise of this data request were followed, this case would not be a single rate case. Instead, it would be 29 rate cases, where operating costs, capital

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structure, cost of capital, and investment would have to be allocated and determined for each of the Cascadia's 29 water systems. This would be unreasonable and burdensome.

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**DATA REQUEST NO. 138:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 129-141:** These data requests relate to your recommendation to meld the Island and Peninsula rates into a single rate, and the following TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 14-15:

Q. Why is a single tariff rate for Island and Peninsula appropriate?

A. I understand that Cascadia did not propose a single tariff rate for Island and Peninsula to limit the issues being litigated. However, the tariff issues need to be addressed. The Commission has historically set water rates through a single tariff rate. One reason for this is that the Commission cannot set discriminatory rates. fn16 RCW 80.28.020.

Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

Please list all other Cascadia improvements you believe benefit customers other than those of the water system where improvements were made.

**RESPONSE:**

See Staff's Responses to WCAW's Data Request No. 137, WCAW's Data Request No. 136, WCAW's Data Request No. 134, WCAW's Data Request No. 133, WCAW's Data Request No. 132, and WCAW's Data Request No. 122.

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**DATA REQUEST NO. 139:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade’s [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia’s Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 129-141:** These data requests relate to your recommendation to meld the Island and Peninsula rates into a single rate, and the following TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 14-15:

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Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

Please produce all documentation memorializing Staff’s analysis of “economies of scale” insofar as it applies herein.

**RESPONSE:**

None.

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**DATA REQUEST NO. 140:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 129-141:** These data requests relate to your recommendation to meld the Island and Peninsula rates into a single rate, and the following TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 14-15:

Q. Why is a single tariff rate for Island and Peninsula appropriate?

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Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

Please produce all documents regarding, your analysis of the consolidated rate structure that you propose, including the costs and benefits of that rate structure for customers utilizing each water system, the extent to which the consolidated rates charged to customers utilizing each water system will differ from rates calculated for each water system separately, and the date by which total cumulative rates paid by all Cascadia customers will reach parity.

**RESPONSE:**



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See Direct Testimony of Rachel Stark, Exhibits RS-2 and RS-3.

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**DATA REQUEST NO. 141:**

**Introduction to WCAW DR 99-141:** These data requests incorporate by reference and refer to the TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 2-3. It is assumed Mr. Sevall will answer these data requests. Please advise if that is not the case.

Additionally, I recommend that the Commission consolidate the tariffs for Cascade's [sic] Peninsula and Island water systems to a single tariff, adopt a separate tariff for Cascadia's Pelican water systems, and remove the surcharge that applies to the Aquarius water system customers. I also recommend that the resulting rate increase be phased over two years.

**Introduction to WCAW DR 129-141:** These data requests relate to your recommendation to meld the Island and Peninsula rates into a single rate, and the following TESTIMONY OF SCOTT SEVALL, Exh. SS -1T at pp. 14-15:

Q. Why is a single tariff rate for Island and Peninsula appropriate?

A. I understand that Cascadia did not propose a single tariff rate for Island and Peninsula to limit the issues being litigated. However, the tariff issues need to be addressed. The Commission has historically set water rates through a single tariff rate. One reason for this is that the Commission cannot set discriminatory rates. fn16 RCW 80.28.020.

Water utilities must charge the same rate for the same service unless there is a clear distinction presented. In this case, the service provided is clean, potable water, and the Island and Peninsula water systems are similarly situated sharing water operators, system management, and have similar water usage patterns. Pelican Point does not share the same operators and has a distinct geography, located on the eastern side of the Cascade Mountains. Pelican point has a very different water usage pattern from

Please describe, and produce all documents regarding, your analysis of alternative consolidated rate structures that you considered, including the costs and benefits of that rate structure for customers utilizing each water system, the extent to which the consolidated rates charged to customers utilizing each water system would differ from rates calculated for each water system separately, and the date by which total cumulative rates paid by all Cascadia customers would reach parity.

**RESPONSE:**

See Exhibits RS-2 and RS-3. Mr. Sevall proposed single tariff pricing for general rates only and spoke to rate discrimination in Exhibit SS-1T. Furthermore, the capital structure proposed by Staff is for the entirety of Cascadia, which the benefits can be seen in Staff's Response to WCAW's Data Request No.122.

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**DATA REQUEST NO. 142:**

When did you become aware that Cascadia replaced reservoirs (Major Projects 3, 7 and 8 per CJL 1T p. 9) with systems designed for greater capacity than that needed for either existing connection or approved connections?

**RESPONSE:**

Staff is aware of the argument that has been made by other parties about certain reservoirs being designed for greater capacity than needed for exiting or approved connections. Staff conducted site visits on April 22 and 23, 2024, and observed the new construction for projects 3 and 7 on those days. Staff reviewed the costs for all three projects as submitted in the Company filing on February 29, 2024. Staff's investigation did not require any determinations about the capacity of the infrastructure for projects 3, 7, or 8, or whether that capacity "exceeded what was needed for existing connections or approved connections". Staff's only requirements for rate setting was to determine whether the infrastructure complied with DOH requirements for those systems and to verify the cost of the infrastructure, which it did.

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**DATA REQUEST NO. 143:**

How did you become so aware?

**RESPONSE:**

Staff is aware of the argument that has been made by other parties about certain reservoirs being designed for greater capacity than needed for existing or approved connections. Staff conducted site visits on April 22 and 23, 2024, and observed the new construction for projects 3 and 7 on those days. Staff reviewed the costs for all three projects as submitted in the company filing on February 29, 2024.

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**DATA REQUEST NO. 144:**

Did you conduct any analysis of whether such expansion of capacity was prudent? If not, do you think you should? If not, explain why.

**RESPONSE:**

Staff evaluated whether the reservoir projects were prudent. Staff concluded that the reservoir projects were prudent. See Staff Responses to WCAW Data Request No. 27, WCAW Data Request No. 142, and WCAW Data Request No. 143.

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**DATA REQUEST NO. 145:**

Did you conduct any analysis of whether such expansion of capacity was of benefit to existing customers? If not, do you think you should? If not, explain why.

**RESPONSE:**

No. See Staff Responses to WCAW Data Request No. 27, WCAW Data Request No. 142, and WCAW Data Request No. 143.

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**DATA REQUEST NO. 146:**

Did you conduct any analysis of whether such expansion of capacity meets the definition of “used and useful”? If not, do you think you should? If not, explain why.

**RESPONSE:**

Yes. See Staff Responses to WCAW Data Request No. 27, WCAW Data Request No. 142, and WCAW Data Request No. 143.

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**DATA REQUEST NO. 147:**

Did you conduct any analysis of the likelihood of Cascadia increasing its customer base for each affected system to the number of connections for which capacity was expanded? If not, do you think you should? If not, explain why.

**RESPONSE:**

No. See Staff Responses to WCAW Data Request No. 27, WCAW Data Request No. 142, and WCAW Data Request No. 143.



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**DATA REQUEST NO. 148:**

Please produce all documentation memorializing any analysis you did regarding Cascadia's expansion of capacity in Major Projects 3, 7 and 8.

**RESPONSE:**

None. However, please see Staff Responses to WCAW Data Request No. 39 and WCAW Data Request No. 61, which provides documentation analyzed in this case.

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**DATA REQUEST NO. 149:**

Did you conduct any type of cost/benefit analysis regarding the value to customers of standby generators and SCADA systems? If so, please produce same.

**RESPONSE:**

Staff did not conduct a cost-benefit analysis. Staff conducted a standard prudence review.

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**DATA REQUEST NO. 150:**

How does Staff determine that the base rate for each customer appropriately reflects that customer's share of system costs?

**RESPONSE:**

The revenue requirement is the entire amount that the Company needs to recover during a 12-month period, which includes the cost of rate base. There are other costs that are included in revenue requirement. Staff does not evaluate rate base per customer. Rates are designed to recover the revenue requirement across all customers.

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**DATA REQUEST NO. 151:**

Does the base rate cover each customer's share of system costs regardless of the customer's actual usage or activities downstream of the meter?

**RESPONSE:**

See Staff's Response to WCAW's Data Request No. 150.

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**DATA REQUEST NO. 152:**

How does Staff determine that the ready-to-serve rate for each customer appropriately reflects that customer's share of system costs?

**RESPONSE:**

Ready-to-serve is set at the base rate and does not include usage. See Direct Testimony of Scott Sevall, Exhibit SS-1T at pages 15-16 for how base rates are set.

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**DATA REQUEST NO. 153:**

Does the ready-to-serve rate cover each customer's share of system costs regardless of the customer's actual usage or activities downstream of the location of that customer's meter or potential connection to a system distribution main?

**RESPONSE:**

Ready-to-serve is set at the base rate and does not include usage. See Direct Testimony of Scott Sevall, Exhibit SS-1T at pages 15-16 for how base rates are set.

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**DATA REQUEST NO. 154:**

Is it appropriate for Cascadia to charge ready-to-serve rates for undeveloped lots in a neighborhood served by a HOA that owns its distribution mains, purchases its water from Cascadia, and is billed by Cascadia based on a 2-inch meter located at the beginning of the HOA's distribution system?

**RESPONSE:**

Objection. Irrelevant and beyond the scope of this case. Without waiving and subject to the stated objection, Staff responds as follows:

This case is not about Cascadia's billing practices, and there is nothing in the record relating to billing practices. Staff has no information regarding the situation described in the data request. Staff recommends that WCAW contact the Commission's Consumer Protection Section, which addresses tariff and billing complaints and questions.