

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
UW-240151

WCAW RESPONSE TO CASCADIA WATER COMPANY DATA REQUEST

DATE PREPARED: February 4, 2025
REQUESTER: Cascadia Water
WITNESS: Kent Hanson
RESPONDER: Kent Hanson
TELEPHONE: 206-919-6684

DR #10: Please refer to WCAW’s Response to Cascadia Water Data Request No. 001 to WCAW, which states, in part, that “[t]o the best of our knowledge all members are customers of Cascadia Water” and that “[t]he individuals preparing this and the following responses are Vicki Colburn, Kent Hanson, and Steve Todd.” Do you contend that Kent Hanson is a customer of Cascadia Water solely because he resides on the system that is a wholesale customer of Cascadia Water?

WCAW RESPONSE:

Kent Hanson is a member of a homeowners’ association that purchases water from Cascadia. He pays a pro rata share of all amounts billed by Cascadia to the homeowners’ association.

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DR #11: Please refer to the Comments of Goss Lakeridge Acres Association in Opposition to Respondent’s Tariff Increase,” signed by Kent E. Hanson, President, Goss Lakeridge Acres Association (“GLAA”), dated June 14, 2024 and filed in Docket UW-240151 (posted June 2024). Please provide the GLAA resolution or minutes giving Mr. Hanson authority to file these comments in the Cascadia Water rate case on behalf of GLAA.

WCAW RESPONSE:

WCAW objects to this request because it does not seek information that is relevant to the issues in the adjudicative proceeding or that may lead to the production of information that is relevant, in contravention of WAC 480-07-400(3).

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WCAW RESPONSE TO CASCADIA WATER COMPANY DATA REQUEST

DATE PREPARED: February 4, 2025

REQUESTER: Cascadia Water

WITNESS: Blaine Gilles

RESPONDER: Kent Hanson

TELEPHONE: 206-919-6684

DR #12: Please refer to Exh. BCG-1T, pages 2-5, in which Mr. Gilles describes his “professional background as it relates to this case.” Please provide Mr. Gilles’ water operator certification number, or equivalent, or provide certificates from any water operation classes Mr. Gilles has attended.

WCAW RESPONSE:

Blaine Gilles is not a certified water operator.

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For DRs #13 through #18 that follow, please refer to Exhibit 1 (Water Consumer Advocates of Olympic Peninsula – List of Consumers Who Oppose UW-240151) to the Comments of the Water Consumer Advocates of Olympic Peninsula in Opposition to Respondent’s Tariff Increase, filed June 21, 2024.

DR #13: A customer named “██████” (no last name) is listed on page 3. Please provide ██████’s last name.

DR #14: A customer named “██████” is listed on page 4. Please provide ██████’s full last name.

DR #15: A customer named “██████” (no last name) is listed on page 4. Please provide ██████’s last name.

DR #16: A customer named “██████████” is listed on page 5. We do not have a customer by this name, and there are no customers in the Clallam County parcel database with this last name. Please provide this customer’s actual name.

WCAW RESPONSE TO DRs 13 -16: WCAW objects to this request because it does not seek information that is relevant to the issues in the adjudicative proceeding or that may lead to the production of information that is relevant, in contravention of WAC 480-07-400(3).

DR #17: Do you contend that all customers were only reported once, and there were no duplications on Exhibit 1? Please explain your response.

WCAW RESPONSE: Duplications are unlikely. Many persons known to me submitted their own names. Other names were entered on sign-in sheets at small meetings where I spoke.

DR #18: Do all of the names listed in Exhibit 1 also appear in WCAW’s confidential attachment to its response to Cascadia Water Data Request No. 002 to WCAW? If not, for each name that appeared in Exhibit 1 that does not appear in that confidential attachment, please explain why not.

WCAW RESPONSE: WCAW objects to this request because it does not seek information that is relevant to the issues in the adjudicative proceeding or that may lead to the production of information that is relevant, in contravention of WAC 480-07-400(3).

REDACTED

Shaded information is designated as CONFIDENTIAL per Protective Order in Docket UW-240151

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DR #19: Please refer to the Minutes of the Meeting of the Blue Ribbon Farms Homeowners' Association Board of Directors - April 8, 2024, available on the internet here: [2024-04-08-BRFBoardMtg.pdf](#). In numbered paragraph 3 ("Report on activities of the Water Consumers Advocates Olympic Peninsula (CWAOP) – Vicki Colburn"), subsection c states, in part: "Mr. Zacharias asked about water treatment in these systems, and Ms. Colburn responded that the new site has limited treatment. Mr. Zacharias pointed out there surely will be new mandates to do treatment, regardless of size." Does WCAW or Ms. Colburn (s member of WCAW's "executive committee") contend that Mr. Zacharias was incorrect in his statement? Please explain your response.

WCAW RESPONSE:

I do not recall making any such statement and believe that the statement is not correct.

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DR #20: Please refer to The Grass Strip, a Newsletter for the Blue Ribbon Farms Community (“BRFC”), Volume 8, Number 1, July 2024, available on the internet here: [The Grass Strip Newsletter](#). The following language appears under the heading “Cascadia Water Update”: “Recently, you all received from Vicki Coburn an update regarding the requested water rate increase by Cascadia Water.... One of the things she is asking is a more formal membership in the “Water Consumer Advocates of Washington.” She needs to convert her informal list “into a more complete list should it need to be provided during this process.” *Vicki continued:* “Previously, I accepted email addresses without full details and also email addresses that were sent by helpful neighbors. To be considered a member of Water Consumer Advocates of Washington, and continue receiving information, I now need names, address, email address, water system and a signature.... The reason for the signature is that during the open meeting process, Cascadia stated that some were not customers—not a requirement and some were on the list without their knowledge or permission. Thus, the need for a signature.” Please produce the signatures to verify the names that were provided in WCAW’s confidential attachment to its response to Cascadia Water Data Request No. 002 to WCAW.

WCAW RESPONSE:

WCAW objects to this request because it does not seek information that is relevant to the issues in the adjudicative proceeding or that may lead to the production of information that is relevant, in contravention of WAC 480-07-400(3), and because it is unduly burdensome.

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For DRs #21 through #25 that follow, please refer to The Grass Strip, a Newsletter for the Blue Ribbon Farms Community (“BRFC”), Volume 8, Number 3, December 2024, available on the internet here: [The Grass Strip Newsletter](#). The following language appears under the heading “Cascadia Water Update”: The following language appears under the heading “Update on Cascadia Water Rate Issue”: “On Tuesday, Nov 19, a mandatory mediation was held.... David Garrett, another one of our experts, also comments that the requested rate adjustment is too high, and Scott Duren yet another of our advisors, questions certain capital improvement projects.”

DR #21: Who submitted this information to be published in this particular newsletter?

WCAW RESPONSE:
I do not know.

DR #22: Why is it contended that the mediation was “mandatory”?

WCAW RESPONSE:
I do not know.

DR #23: As David Garrett is an expert witness for Public Counsel, why is Mr. Garrett referred to as one of “our” (i.e., BRFC) experts?

WCAW RESPONSE:
I do not know.

DR #24: As Scott Duren is an expert witness for Public Counsel, why is Mr. Duren referred to as another of “our” (i.e., BRFC) advisors?

WCAW RESPONSE:
I do not know.

DR #25: Is WCAW contending that Mr. Garrett and/or Mr. Duren are experts or advisors of WCAW? Please explain your response.

WCAW RESPONSE:
No.

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DR #26: Please refer to the home page of the Blue Ribbon Farms Community (“BRFC”), available on the internet here: <https://www.blueribbonfarmsassociation.com/index.shtml>. There is a bullet under “What’s New” saying “Another Proposed Cascadia Water Rate Increase,” with a link to the following page available on the internet: [2024-04-15_CascadiaWaterRateIncreaseProposal.pdf](#). Clicking that link takes you to a page that quotes “Ms. Colburn and other volunteers are currently working on developing a spreadsheet which will allow you to see exactly how this proposed rate increase would affect your water bill. If you are on the water rate email list, you will receive a copy of the spreadsheet.” Please produce a copy of that spreadsheet.

WCAW RESPONSE:

I did not create any such spreadsheet. To my knowledge no volunteer created any such spreadsheet.

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RESPONDER: Vicki Colburn

TELEPHONE: 206-919-6684

DR #27: Please refer to Exh. CJL-1T, Page 33, Line 5. Does WCAW have a copy of the Southwest Region Water System Plan that Cascadia Water filed with the Department of Health in June 2024? If so, when did WCAW receive a copy of it and from whom? Please produce a copy of that plan.

WCAW RESPONSE:

WCAW does not have a copy of the document described.

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For DRs #28 through #32 that follow, please refer to page 10, lines 15-17 of the Comments of the Water Consumer Advocates of Olympic Peninsula in Opposition to Respondent's Tariff Increase, filed June 21, 2024, specifically the following statement: "A DOH report filed by Cascadia, Exhibit 6, shows that the smaller tank had a remaining life of 4 years and the larger tank of 8.5 to 9.5 years and that DOH gave them a condition rating of "5" out of "10, which means "moderate deterioration."

DR #28: Where/how was this Exhibit 6 obtained?

WCAW RESPONSE: The document was provided by the Washington Department of Health

DR #29: Who obtained this Exhibit 6?

WCAW RESPONSE: Vicki Colburn

DR #30: Who prepared this Exhibit 6?

WCAW RESPONSE: Based the instructions in the document, it was completed by the system owner.

DR #31: Please produce all documents, records, and/or analyses in your possession, control or custody that demonstrate that Cascadia Water "filed" Exhibit 6 with the DOH.

WCAW RESPONSE: WCAW has no such documents.

DR #32: Why is it referred to as "a DOH report?" Please produce all documents, records, and/or analyses in your possession, control or custody that demonstrate that it is a DOH report.

WCAW RESPONSE: I was advised by DOH that the document was a DOH form to be completed by water system owner in order to receive credits or other benefits when applying for Drinking Water State Revolving Fund loans or perhaps other assistance. WCAW has no documents requested.

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WITNESS: Kent Hanson

RESPONDER: Kent Hanson

TELEPHONE: 206-919-6684

DR #33: Has any member of the executive committee for WCAW ever contacted Cascadia Water requesting assistance about the water system behind Cascadia Water's meter at Goss Lakeridge Acres? If so, please disclose the name of such executive committee member, the detailed nature of those contacts, and the resulting assistance provided by Cascadia Water.

WCAW RESPONSE:

Kent Hanson contacted Culley Lehman to request that Cascadia serve as the satellite management agency for Goss Lakeridge Acres (GLAA), but the request was declined.

Mr. Hanson also requested that Mr. Lehman to sign a Level 2 Assessment form after a distribution line was repaired in 2023. Mr. Lehman signed the form.

Mr. Hanson has contacted Mr. Lehman on perhaps two occasions after samples taken after water main repairs were positive for coliform. On one occasion, Mr. Lehman chlorinated the water near the source at CAL Waterworks.

Mr. Hanson has requested information such as the location of a shut-off valve and a recommendation for a pump service company.

Mr. Hanson contacted Mr. Lehman about an apparent error in Cascadia's bimonthly water bills to GLAA that resulted in charges greater than authorized. Mr. Lehman reported that Cascadia's bills over the preceding six years contained two errors: one resulting in over-billing totaling \$7,963.54 and the other resulting in under-billing totaling \$9,074.26.

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DR #34: Please refer to Exh. CJL-12 (DOH Water System Design Manual), page 16 of 518, specifically section 1.3 (“Must” versus “Should”). Confirm or deny that section 1.3 states, in part: “Throughout this manual we use “**must**”, “**will**”, “**shall**”, and “**required**” when design practice is sufficiently standardized to permit specific delineation of requirements, or where safeguarding public health justifies definitive criteria or action (such as state statute or rule requirements). Design engineers have an obligation to satisfy the criteria in such instances.” (Emphasis in original).

WCAW RESPONSE:

DR #34 accurately quotes two sentences that appear on page 3 (pdf page 16) of the Design Manual.

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RESPONDER: Kent Hanson

TELEPHONE: 206-919-6684

DR #35: Does WCAW contend that installing meters on a Class A water system in the State of Washington is not a requirement by the DOH? Please explain your answer.

WCAW RESPONSE:

No. Metering requirements are established by WAC 246-290-496.

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DR #36: Does WCAW contend that a Corrective Action is required for a significant deficiency/finding from a DOH sanitary survey? Please explain your answer.

WCAW RESPONSE:

Groundwater systems are required to take corrective action to address significant deficiencies pursuant to WAC 246-290-453.

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RESPONDER: Kent Hanson

TELEPHONE: 206-919-6684

DR #37: Does WCAW contend that working fire hydrants assist with fighting a fire? Please explain your answer.

WCAW RESPONSE:

Working fire hydrants can assist with fighting a fire that is located within 1,000 feet of hydrant.

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WITNESS: Blaine Gilles

RESPONDER: Kent Hanson

TELEPHONE: 206-919-6684

DR #38: Is WCAW witness Blaine Gilles a customer of Cascadia Water? Please explain your answer.

WCAW RESPONSE:

Yes. Mr. Gilles receives water from the Estates water system owned by Cascadia.

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WCAW RESPONSE TO CASCADIA WATER COMPANY DATA REQUEST

DATE PREPARED: February 4, 2025

REQUESTER: Cascadia Water

WITNESS: Harry Palmer

RESPONDER: Kent Hanson

TELEPHONE: 206-919-6684

DR #39: Is WCAW witness Harry Palmer a customer of Cascadia Water? Please explain your answer.

WCAW RESPONSE:

Harry Palmer is a member of a homeowners' association that purchases water from Cascadia. He pays a pro rata share of all amounts billed by Cascadia to the homeowners' association.

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WITNESS: Kent Hanson

RESPONDER: Kent Hanson

TELEPHONE: 206-919-6684

DR #40: Does WCAW contend that pressure would not be lost during a power outage if a standby generator were not installed? If yes, please produce all documents upon which you rely in so contending.

WCAW RESPONSE:

Whether a power outage would cause pressure loss in a water system that does not have standby generator depends on several factors. Each system must be individually evaluated to determine whether a standby generator is necessary to prevent pressure loss.

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WITNESS: Kent Hanson

RESPONDER: Kent Hanson

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DR #41: Does WCAW contend that a reservoir would be refilled if a system lost power and did not have a standby generator installed? If yes, please produce all documents upon which you rely in so contending.

WCAW RESPONSE:

The answer depends on the water source and the design of the water system. Each situation must be evaluated individually.

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TELEPHONE: 206-919-6684

DR #42: How many executive members of WCAW reside on a Cascadia Water system that does not have a standby generator installed? Please name each such member and state on which Cascadia Water the executive member resides.

WCAW RESPONSE:

None, based on the generators identified in Cascadia's workbook.

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DR #43: UW-240151 WCAW DR 19 asked the Company: “Do you contend that either the EPA or WDOH have established an MCL for manganese? If so, please provide copies of all documents you rely upon in making such a contention.” Does WCAW contend that either or both the EPA and/or WDOH have not established an MCL for manganese? If so, please provide copies of all documents you rely upon in making such a contention.”

WCAW RESPONSE:

No.