

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UW-240151**

*Washington Utilities & Transportation Commission v. Cascadia Water, LLC*

**RESPONSE OF PUBLIC COUNSEL TO CASCADIA WATER  
DATA REQUEST NO(s). 001-006**

Request No: 005  
Directed to: Public Counsel  
Date Received: January 28, 2025  
Date Produced: February 4, 2025  
Prepared by: Public Counsel  
Witnesses: Stefan de Villiers

**CASCADIA DATA REQUEST NO. 005 TO PUBLIC COUNSEL**

During WUTC Docket UW-240151, did Cascadia Water offer to Public Counsel to conduct site visits of the Company's systems with Public Counsel representatives? Did Public Counsel accept that offer? If so, please specify the sites visited by Public Counsel representatives. If not, please explain why Public Counsel did not accept Cascadia Water's offer.

**RESPONSE**

Objection, Public Counsel's reasoning for undertaking or not undertaking any form of discovery in a contested rate matter is protected from disclosure by the attorney work product doctrine. Further, a data request about Public Counsel's reasoning about how to conduct discovery in this rate case is not information relevant to an issue in the adjudicative proceeding nor will it lead to discovery of relevant information. Public Counsel stands on this objection and declines to answer as to Public Counsel's reasoning.

Yes, Culley Lehman offered Public Counsel, and specifically Senior Counsel Tad Robinson O'Neill, the opportunity to conduct site visits before the open public meeting in this docket. Public Counsel employees or witnesses have not conducted a site visit.