

**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

February 6, 2025

Cross-Examination Exhibit of Culley Lehman

CJL-__X

Cascadia Responses to WCAW DRs 1-96



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 1

Who had the ultimate decision-making authority to approve undertaking the capital improvement projects listed as “assets” in PC IR3?

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water LLC’s responder and witness who can speak to the capital improvement projects at issue in this proceeding is Culley Lehman.



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UW-240151

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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 2

Please identify each person involved in the decision-making process by name, employer, title, and describe their role in the decision-making process for each “asset”.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks documents or information beyond the scope of Cascadia’s possession, custody or control as it seeks documents from third-party entities that are not participants in this proceeding.

Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water LLC’s responder and witness who can speak to the capital improvement projects at issue in this proceeding is Culley Lehman.



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UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 3

Did Cascadia rely upon or consult with any outside professional engineers during the decision-making process to approve undertaking any of the “assets” herein? If so, please identify each such engineer, their firm, and the project involved.

Response:

Cascadia consulted with Robert Bennion, PE and Jeff Tasoff, PE from Facet (formerly DCG Watershed, Inc.) in the development of the following projects:

1. Unified Water System Plan 2022
2. Del Bay – Waterline Replacement
3. CAL Waterworks – Distribution System Loop at Beachwood Drive
4. CAL Waterworks – Reservoir Replacement & Booster Pump Improvements
5. W&B Waterworks #1 – Watermain Replacement & Mutiny Lane PRV Vault
6. W&B Waterworks #1 – Mutiny Bay Road PRV Vault Replacement
7. Rolf Bruun – Disinfection System
8. Estates – Reservoir, Booster Pumps, & Manganese Treatment
9. W&B Waterworks #1 – Reservoir, Pumphouse, Treatment & Watermain Replacement
10. Sea View – Source Development
11. Diamond Point – Disinfection System
12. Bacus Road #1 – Pumphouse Replacement Project
13. Silver Lake – Reservoir Replacement Project
14. Southwest Region Water System Plan

Cascadia Water also consulted with Cullen J. Wilder, PE from ATEC Water Systems, LLC in the development of the following projects:

1. Estates – Reservoir, Booster Pumps, & Manganese Treatment

2. W&B Waterworks #1 – Reservoir, Pumphouse, Treatment & Watermain Replacement



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Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 4

Please produce all documents prepared by any outside engineer relied upon by Cascadia in deciding whether to undertake a project.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks documents or information beyond the scope of Cascadia's possession, custody or control as it seeks documents from third-party entities that are not participants in this proceeding.

Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

The main document prepared by an outside engineer relied upon by Cascadia Water LLC in deciding whether to undertake all projects in this rate case is the Washington Department of Health design manual, Pub 331-123, Revised June 2020. UW-240151 WCAW DR 4 Attachment 1.

The second document prepared by an outside engineer relied upon by Cascadia Water in deciding whether to undertake projects on the Island System is our Unified Water System Plan, prepared by Davido Consulting Group (now Facet), submitted in August 2021, approved in 2022 by engineers with the Washington Department of Health. See UW-240151 WCAW DR 4 Attachments 2-4.

A third document prepared by an outside engineer relied upon by Cascadia Water in deciding whether to undertake the Diamond Point Chlorination project is the directive from the Washington Department of Health, prepared by Cecilia Welch, E.I.T. See UW-240151 WCAW DR 4 Attachment 5.

There is also a fourth document relied upon by Cascadia Water in deciding whether to undertake the Rolf Bruun Chlorination project, which is the directive from the Washington Department of Health, prepared by Ingrid Salmon. She, however, is not an outside engineer. She does, however, hold a Master's degree in Hydrology and Water

Resources Science, and has been employed with the Department of Health for over 25 years. See UW-240151 WCAW DR 4 Attachment 6.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 5

Did Cascadia have a general procedure it followed when deciding whether to undertake a project, such as ensuring compliance with WCA 246-290-100 through 140? If so, please describe what steps were to be followed. If such procedure was reduced to writing, please produce same.

Response:

Cascadia Water identifies system deficiencies and prioritizes the resulting projects. Project reports for identified projects are submitted to DOH who ensures compliance with WAC requirements.

Cascadia Water prioritizes projects as follows:

1. Projects where the DOH has issued a notice of corrective action
2. Projects to address sanitary survey findings
3. Projects which impact the system's ability to provide safe and reliable drinking water to consumers
4. Projects to reduce operational costs/staffing needs
5. Projects to increase system capacity
6. Other projects

This is also documented further in our Unified Water System Plan from August 2021:

3.5 Selection and Justification of Improvement Projects

System needs discussed in this chapter were selected and prioritized based on the categories shown in Table 3-25:

Table 3-25 Potential Improvements Prioritization Categories

Category	Description	Time Frame
Emergency	Improvement needed to eliminate a health risk or serious physical risk to the system	Now
Immediate	Improvement that should be investigated, initiated, and/or completed as soon as possible to minimize potential risk or to get process started for future needs	Within 1 year
Near Term	Improvement that improves capacity, flow, or redundancy	1 to 2 years
Medium Range	Improvement that is not necessary near term but will improve system enough that it should not be long term	2 to 6 years
Long Range	Improvement that is needed in the future	6+ years
Budget Providing	Non-critical improvement that can occur anytime budget providing	Anytime budget providing

The time frames shown in Table 3-25 are for guidance purposes and are subject to change based on such factors as regulations and the Cascadia’s financial situation.

Cascadia Water also included this same language in the Southwest Water System Plan filed with the DOH in June 2024.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Matt Rowell and Culley Lehman

Request No.: UW-240151 WCAW DR 6

Did Cascadia analyze the potential rate impact on its customers when deciding whether to undertake a project? If so, please produce all such analyses and identify who prepared each.

Response:

The capital projects we have undertaken are necessary to provide adequate, reliable, and safe service. We ensure the rate impact of these projects is minimized by completing them on a least-cost, least-risk basis. Cascadia Water does not conduct a formal rate-making analysis to assess the rate impact of each project when deciding whether to undertake a project.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 7

Did Cascadia analyze the risks and benefits to its customers when deciding whether to undertake a project? If so, please produce all such analyses and identify who prepared each.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Yes, Cascadia analyzed the risks and benefits to its customers when deciding whether to undertake a project. An evaluation is done by the General Manager with varying input/discussion from system operators, engineers, and other subject matter experts.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 8

Did Cascadia analyze the likely costs of a project when deciding whether to undertake a project? If so, please produce all such analyses and identify who prepared each.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water LLC first determines whether certain projects are required for health, safety, or reliability reasons. Then, yes, Cascadia Water will analyze the likely costs of a project when deciding whether to undertake a project. At that point, the project has progressed to the stage typically requiring a project bid or other more formalized process.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 9

Did Cascadia analyze alternative options when deciding whether to undertake a project? If so, please produce all such analyses and identify who prepared each.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Alternatives are analyzed for projects undertaken to ensure customer safety, provide consistency with regulatory requirements, company, and industry standards, and reduce installation and long-term operational costs. These are worked through primarily as discussions about possible alternatives. The following are examples of the types of alternatives considered for projects: reservoir building material (it was decided to request bids for both glass-fused steel and concrete), booster pump configurations (vertical vs horizontal), electrical load (single-phase versus three-phase), repair versus replace, etc.

In certain cases, we did not analyze alternative options when deciding whether to undertake a project. For example, when the Washington Department of Health issued a directive for us to install chlorination on a system, we did not analyze alternative options.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 10

Identify all employees of Cascadia who contributed to the responses to Advocates and Public Counsel's prior data requests by name, title and which requests they responded to.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued. These informal data requests were provided in an effort to reach a settlement with Staff, Public Counsel, and Advocates, and were not part of the formal discovery process which started on September 11, 2024, pursuant to Order 02.

Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water LLC's responders and witnesses who can speak to the issues in this proceeding are Matt Rowell and Culley Lehman.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Matt Rowell and Culley Lehman

Request No.: UW-240151 WCAW DR 11

Identify all employees of NW Natural who contributed to the responses to Advocates and Public Counsel's prior data requests by name, title and which requests they responded to.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued. These informal data requests were provided in an effort to reach a settlement with Staff and Public Counsel and were not part of the formal discovery process which started on September 11, 2024, pursuant to Order 02.

Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water LLC's responders and witnesses who can speak to the issues in this proceeding are Matt Rowell and Culley Lehman.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Matt Rowell and Culley Lehman

Request No.: UW-240151 WCAW DR 12

Identify all others who contributed to the responses to Advocates and Public Counsel's prior data requests by name, title, employer and which requests they responded to.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, and to the extent it seeks documents or information beyond the scope of Cascadia's possession, custody or control as it seeks documents regarding third-party entities that are not participants in this proceeding. These informal data requests were provided in an effort to reach a settlement with Staff and Public Counsel and were not part of the formal discovery process which started on September 11, 2024, pursuant to Order 02.

Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water LLC's responders and witnesses who can speak to the issues in this proceeding are Matt Rowell and Culley Lehman.



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Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 13

Advocates' prior WCA DR 9 requests that Cascadia:

"Provide all documents, records, analysis and reviews regarding or relating to inspections of the two underground tanks in the Estates Systems prior to the installation of the new aboveground water system".

Cascadia's Response:

The Sanitary Survey and corresponding Corrective Action Plan are available from the Department of Health via a public records request.

Please provide all documents, records, analyses and reviews regarding or relating to inspections of the two underground tanks in the Estates Systems prior to the installation of the new aboveground water system.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it lacks temporal limitations and otherwise requests "all" documents, etc.

As already provided to the Water Consumer Advocates of Washington via a Box site in July 2024, here again are the underwater inspection video and reports performed and prepared by Integrated Underwater Services on February 3, 2022.

As we will be including in testimony being filed with our case, here is a 2007 underwater inspection report (UW-240151 WCAW DR 13 Attachment 1) the previous owner of the system had done, performed and prepared by LiquiVision Technology Diving Services.

We also are providing a document of an underwater inspection requested by the previous owner of the system with Diversified Divers, LLC in 2015, attached as UW-240151 WCAW DR 13 Attachment 2. We were not provided a final report, so we cannot confirm whether the previous owner actually followed through with an inspection.

We also include the sanitary survey report from the December 2021 inspection with Department of Health, attached as UW-240151 WCAW DR 13 Attachment 3. This can also be found in Water Consumer Advocates Exhibit 4 of filed comments from June 21, 2024.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 14

The Water System Plan (WSP) prepared by the prior owner of Estates called for the alternating emptying of one tank for inspection and maintenance on a regular basis while the other tank would provide service. Has Cascadia ever emptied one tank for inspection and maintenance since it purchased Estates? If so, please produce all documents memorializing said inspection(s).

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it lacks temporal limitations and otherwise requests "all" documents.

We believe you are referencing the 1994 Water System Plan.

To answer the question: no, as this question references a document that expired twenty-four years ago. As stated in that document, "*As of June, 1994, a total of 181 active services are connected to the distribution system.*" With that number of customers, shutting off one tank for inspection as the WSP indicates would have been possible. Since the system has more than doubled in size since then, this is no longer a viable option.

Also, industry standards have moved away from emptying tanks to using divers (demonstrated by the previous owner in 2007 and 2015), and more recently to using a remote-operated vehicle as Cascadia did in 2022, a copy of that report is attached as Attachment 1. This is a safer, cleaner, and less drastic approach for the water system overall.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 15

Please provide the Sanitary Survey and corresponding Corrective Action Plan you refer to in your response to prior WCA DR 9.

Response:

Our original response was “The Sanitary Survey and corresponding Corrective Action Plan are available from the Department of Health via a public records request.”

The Sanitary Survey we refer to in that earlier answer was provided in our response to UW-240151 WCAW 13. This can also be found in Water Consumer Advocates Exhibit 4 of filed comments from June 21, 2024.

The Corrective Action Plan is attached as UW-240151 WCAW DR 15 Attachment 1. Further documents that were not requested, but that directly relate to this project that we are also providing (as UW-240151 WCAW DR 15 Attachments 2-5), are the project reports and the approval letters for the overall project, and for the construction completion report of the reservoir and booster pumps.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 16

Advocates' prior WCA DR 12 requests that Cascadia:

"Provide all survey inspections performed by the DOH for each Cascadia system involved in this rate case."

Cascadia's Response:

"UW-240151 WCA DR 3 Attachment 1 lists Cascadia Water's current water systems (and corresponding public water system ID numbers). Sanitary survey results can be obtained via a public records request from the Department of Health."

Please produce all Sanitary Surveys performed by DOH for each Cascadia water system within your possession, custody or control, regardless of whether performed before or after Cascadia's formation.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it lacks temporal limitations, project limitations, and otherwise requests "all" surveys for the systems. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Included with this response are sanitary surveys performed by DOH or Island County Public Health for Cascadia Water systems, including the following sanitary surveys performed by DOH or Island County Public Health during Cascadia Water LLC's ownership of the systems:

UW-240151 WCAW DR 16 Attachment 1 - W&B Waterworks #1 – 9/19/2019 –
Department of Health

UW-240151 WCAW DR 16 Attachment 2 -Sea View Water – 12/16/2019 – Department
of Health

UW-240151 WCAW DR 16 Attachment 3 -TEL Company #1 - 8/10/2021

UW-240151 WCAW DR 16 Attachment 4- TEL Company #3 - 8/10/2021

UW-240151 WCAW DR 16 Attachment 5 -TEL Company #4 - 8/17/2021

UW-240151 WCAW DR 16 Attachment 6 -Beachcombers H2O Co - 9/30/2021

UW-240151 WCAW DR 16 Attachment 7 -Discovery Bay Village – 9/30/2021

UW-240151 WCAW DR 16 Attachment 8 -Pelican Point – 11/15/2021

UW-240151 WCAW DR 16 Attachment 9 -Estates Inc – 12/8/2021* (*This can also be
found in Water Consumer Advocates Exhibit 4 of filed comments from June 21, 2024.)

UW-240151 WCAW DR 16 Attachment 10 -Monterra – March 2022

UW-240151 WCAW DR 16 Attachment 11 -Rolf Bruun – Oct 2022

UW-240151 WCAW DR 16 Attachment 12 -Island Lake – 9/28/2022

UW-240151 WCAW DR 16 Attachment 13 -Diamond Point – 7/20/2023

UW-240151 WCAW DR 16 Attachment 14 -Agate West – 10/5/2022

UW-240151 WCAW DR 16 Attachment 15 -Jamestown on Wilcox Lane – July 2023

UW-240151 WCAW DR 16 Attachment 16 -CAL Waterworks – 3/28/2023

UW-240151 WCAW DR 16 Attachment 17 -Del Bay – 12/7/2023

UW-240151 WCAW DR 16 Attachment 18 -Skagit River Colony – 11/15/2023

UW-240151 WCAW DR 16 Attachment 19 -W&B Waterworks #1 – 3/19/2024

UW-240151 WCAW DR 16 Attachment 20 -Sea View Water – 3/19/2024

UW-240151 WCAW DR 16 Attachment 21 - Lynch Cove – 7/25/2024



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 17

Advocates' prior WCA DR 8 requests that Cascadia:

"Provide all documents, records, analysis, that showed the presence of manganese, iron and arsenic in the Estates System water prior to the installation of the new above ground water tank system and booster pumps at levels unacceptable to the Washington Department of Health ("DOH")."

Cascadia's Response:

"The Estates water system PWS ID # is 081669. Samples and exceedances can be found on the Department of Health's Sentry database that houses over 40 years' worth of sample information:

<https://fortress.wa.gov/doh/eh/portal/odw/si/findwatersystem.aspx>"

Please produce all documents, records, and/or analyses in your possession, custody or control that measure the presence of any contaminant in any Cascadia water system, whether prepared by DOH or a private company.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case.

Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Please see UW-240151 WCAW DR 17 Attachment 1.



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 18

Please identify all of the documents responsive to WCA-14, above, that you believe show levels of any contaminant that exceed EPA or DOH Maximum Contaminant Levels (MCL). Please identify the system, the contaminant and the measurement you rely upon in each instance.

Response:

The Company assumes that the reference in the question to “WCA-14” instead should read “WCA-16 and WCA-17.”

There were no exceedances for TEL Company #6 (on the Island) and Blanchard Knob (on the Mainland).

The systems that had Total Coliform present, but no other exceedances for contaminants above the EPA or DOH Maximum Contaminant Level (MCL) were:

Agate West, Bacus Road, Island Lake, Lake Alyson, Jamestown on Wilcox Ln, Lynch Cove, TEL Company #4, TEL Company #5 and TEL Company #11.

We are providing spreadsheets (as a combined UW-240151 WCAW DR 18 Attachment 1) from the DOH Sentry database that list exceedances per system for all remaining Cascadia Water systems (which also include total coliform presence). All results are from state accredited labs.

In addition to this, we included the pilot test for Estates Inc. (UW-240151 WCAW DR 18 Attachment 2) that will be mentioned in our filed testimony as well as the pilot test for W&B Waterworks #1 (UW-240151 WCAW DR 18 Attachment 3).



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Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 19

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.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, and further objects to the extent it requests information not in the possession and control of Cascadia Water LLC.

Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Yes, we do contend that there is an established MCL for manganese. Per a DOH manganese document that we reference in our to-be filed testimony (and attached to this response as UW-240151 WCAW DR 19 Attachment 1): "In 2004, EPA set health advice for manganese in drinking water to keep people safe (0.3 mg/L) and a lower aesthetic standard (0.05 mg/L) to prevent staining and a bad smell or taste in the water." (UW-240151 WCAW DR 19 Attachment 1, page 3.)

That same document also states: "The Washington State Department of Health Office of Drinking Water (ODW) is modifying our recommendations for public water systems that have manganese in their water supply. For many years, manganese in drinking water was considered as only an aesthetic concern, causing discoloration and staining. However, recent studies show negative health effects from exposure to high levels of manganese in drinking water. We have used this new information to revise our guidelines." (UW-240151 WCAW DR 19 Attachment, page 1.)

We also are including an issue paper from DOH that addresses the manganese MCL as well, attached as UW-240151 WCAW DR 19 Attachment 2.

Yes, we do contend that there is an established MCL for manganese. Per a DOH manganese document that we reference in our filed testimony (and attached to this response) "In 2004, EPA set health advice for manganese in drinking water to keep

people safe (0.3 mg/L) and a lower aesthetic standard (0.05 mg/L) to prevent staining and a bad smell or taste in the water.”

That same document goes on to say “The Washington State Department of Health Office of Drinking Water (ODW) is modifying our recommendations for public water systems that have manganese in their water supply. For many years, manganese in drinking water was considered as only an aesthetic concern, causing discoloration and staining. However, recent studies show negative health effects from exposure to high levels of manganese in drinking water. We have used this new information to revise our guidelines.”

We are also including WAC 246-290-310 that lists the MCL for manganese (UW-240151 WCAW DR 19 Attachment 3).

The MCL for Manganese is listed on Table 5 from the EPA. We are not including this as an attachment, but can be found at the following link:

<https://www.epa.gov/sdwa/secondary-drinking-water-standards-guidance-nuisance-chemicals#table-of-secondary>.

Manganese is also on EPA’s candidate list for regulation as a primary contaminant. We include EPA 815-F-22-005, which is the Fact Sheet: Fifth Contaminant Candidate List (CCL 5), attached as UW-240151 WCAW DR 19 Attachment 4.

This is also included in the Code of Federal Regulation (CFR) 143.3 Secondary maximum contaminant levels, which we are not including as an attachment, but can be found at the following link: <https://www.ecfr.gov/current/title-40/section-143.3>.



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Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 20

Please produce a copy of each Annual Water Quality Report (Consumer Confidence Report) (required by the Safe Drinking Water Act) circulated by Cascadia with respect to all Cascadia systems from 2018 through the present.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Please see UW-240151 WCAW DR 20 Attachment 1.



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Data Request Response

Date of Response: 9/25/2024
Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 21

Advocates' prior WCA DR 15 requests that Cascadia:

"Provide all documents that support Cascadia's requested 12 per cent rate of return."

Cascadia's Response:

"Cascadia's requested rate of return is 11.4%, based in part on a 12.0% return on equity. Supporting calculations are included in the Excel Workbooks provided with the application".

Please identify all prior rate cases in Washington where Cascadia received a 12% return on equity.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 22

Please identify all prior rate cases in any other state where a NW Natural water system company received a 12% return on equity.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 23

Please identify all prior rate cases in any other state where a NW Natural water system company asked for a 12% return on equity.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024
Responder/Witness: Matt Rowell

Request No.: UW-240151 WCAW DR 24

Please state the return on equity requested in all prior or current rate cases in any other state by a NW Natural water system company.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 25

Please state the return on equity actually granted to Cascadia or any other NW Natural water system company in all the above referenced rate cases.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 26

Please produce all documents that support Cascadia's requested 10.5% cost of debt for purposes of calculating rate of return.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024
Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 27

Please produce all prior rate cases in Washington where Cascadia received a 10.5% cost of debt for purposes of calculating rate of return.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 28

Please produce all prior rate cases in any other state where a NW Natural water system company received a 10.5% cost of debt for purposes of calculating rate of return.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 29

Please produce all prior rate cases in any other state where a NW Natural water system company asked for a 10.5% cost of debt for purposes of calculating rate of return.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 30

Please state the cost of debt requested in all prior or current rate cases in any other state by a NW Natural water system company.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 31

Please state the cost of debt actually granted to Cascadia or any other NW Natural water system company in all the above referenced rate cases.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is publicly available. Cascadia Water LLC is not obligated to conduct legal research for Advocates. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 32

Has Cascadia ever applied for a Drinking Water State Revolving Fund (DWSRF) loan? If not, why not?

Response:

No, Cascadia has never applied for a Drinking Water State Revolving Fund (DWSRF) loan. We have not needed to because our parent company is capable of funding our necessary investments. Furthermore, DWSRF loans come with additional costs as discussed in our response to UW-240151 WCAW DR 34.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 33

Have any NW Natural water system companies ever applied for a loan from another state's equivalent safe drinking water fund? If not, why not?

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it relates to financing information for an entity and systems that are not a party.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024
Responder/Witness: Matt Rowell

Request No.: UW-240151 WCAW DR 34

Does Cascadia agree it would be appropriate to recognize the potential availability of low interest loans from Washington's DWSRF in assessing cost of debt for purposes of calculating rate of return? If not, why not?

Response:

No. Since the DWSRF relies on federal funding, loans obtained through it must comply with multiple federal regulations that impact the cost of a project. For example, the Davis-Bacon Act requires that all employees of any contractor that works on a project funded through the DWSRF be paid at a certain level. Additionally, the American Iron and Steel (AIS) provision requires Clean DWSRF recipients to use iron and steel products that are produced in the United States. Compliance with provisions such as these requires extensive paperwork on the part of contracts. Thus, these requirements can significantly drive up the cost of projects. So, while some money may be saved on interest expense, it is offset by increased costs elsewhere. Simply looking at interest rates available through the DWSRF would not provide a full picture of the cost impact of utilizing the DWSRF.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 35

Advocates prior WCA DR 2 requests:

"At the June 24,2021 Open Meeting in the Company's last General Rate Case, Docket UW 200979 the Company told the UTC Commissioners that the Company was "still working on" the Water Service Plan ("SWP") for the Estates System. Provide all drafts and documents regarding the WSP for the Estates System.

Cascadia's Response:

"The Water Service Plan for the Estates System is not yet completed. When it is complete it will be made available to the public".

Please provide all drafts and documents, including but not limited to consulting engineer reports, cost estimates, budgets, capital improvement plans and DOH mandates, regarding the WSP for the Estates System.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it lacks temporal limitations, project limitations, and otherwise requests "all" information for the systems.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 36

Please provide all water system plans, both historic and current, for each Cascadia water system, including any drafts of plans for any Cascadia system currently without a plan.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it lacks temporal limitations, project limitations, and otherwise requests "all" plans including "drafts." Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

All final water system plans in our possession for each Cascadia Water system are attached as UW-240151 WCAW DR 36 Attachments 1-15.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 37

Public Counsel's PC IR 1 requests the following:

"Of all assets added to service since the Company's 2021 General Rate Case Docket UW-200979 (2021 GRC), please identify those that the Washington State Department of Health required through a direct order or that were necessary because of overdue compliance (e.g., meter installation). Please do not include assets that the Department of Health only recommended".

Cascadia responded:

"There are two categories of assets relevant to this question. First, there are assets associated with projects mandated by enforcement or corrective action plans from the Washington State Department of Health. Those projects are:

(1) Estates (Clallam County) – Reservoir – This project was required due to the issues and directive that came about due to the sanitary survey and follow-up underwater reservoir inspection due to multiple cracks and root infiltration in the existing underground reservoirs.

(2) Monterra (Clallam County) – Meters - This system was out of compliance with the DOH requirement for systems to meter all connections.

(3) Rolf Bruun (Snohomish County) - Disinfection Treatment - This project was required by DOH due to repeated positive bacteriological tests on the system."

Please produce all documents by which DOH mandated the Estates Reservoir project.

Response:

The sanitary survey cited in the Company's responses to UW-240151 WCA DR 13, UW-240151 WCA DR 15, and UW-240151 WCA DR 16 (and also found in Water Consumer Advocates Exhibit 4 of filed comments from June 21, 2024) required a Corrective Action Plan.

The Corrective Action Plan submitted by Cascadia Water stated that we were going to replace the underground reservoir, which we received approval of from DOH and include as UW-240151 WCAW DR 37 Attachment 1. If we did not then follow-up with the Estates Reservoir project, we would have fallen out of compliance with our required Corrective Action Plan. The Corrective Action Plan was attached to our response to UW-240151 WCA DR 15.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 38

Please produce all documents by which DOH mandated the Monterra Meters project.

Response:

DOH publication "331-595," attached as UW-240151 WCAW DR 38 Attachment 1, explains this requirement.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 39

Please produce all documents by which DOH mandated the Rolf Bruun Disinfection Treatment project.

Response:

The directive from the DOH is attached as a response to this question as UW-240151 WCAW DR 39 Attachment 1.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 40

Please produce all documents, if any, received from a consulting engineer regarding whether any of the above referenced projects were required by DOH.

Response:

Cascadia Water did not receive any documents from a consulting engineer regarding whether any of the above-referenced three projects (i.e., Estates – Reservoir, Monterra – Meters and Rolf Bruun – Disinfection Treatment) were required by DOH.

Please see the Company's responses to UW-240151 WCAW DRs 37, 38 and 39 regarding documentation by from DOH regarding those three projects.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 41

Please produce all documents, including but not limited to statutes, regulations, or consulting engineer reports, upon which you rely to contend a “corrective action plan” constitutes a DOH requirement to undertake a project.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

A DOH publication # 331-197 “Sanitary Surveys of Public Water Systems” (UW240151 WCAW DR 41 Attachment 1) includes the following language: “You **must** address significant deficiencies and significant findings by the assigned due date.” (emphasis added).

As we stated in our response to UW-240151 WCAW-37:

The Corrective Action Plan submitted by Cascadia stated that we were going to replace the underground reservoir, which we received approval from DOH and included as an attachment to WCA-37. If we did not then follow-up with the Estates reservoir project, we would have fallen out of compliance with our **required** Corrective Action Plan. The Corrective Action Plan was attached to our response to UW-240151 WCAW DR 15.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 42

Cascadia further responded to PC IR 1 as follows:

"Second, there are assets installed because of requirements to bring systems into compliance with DOH minimum design standards" (emphasis in original).

Please produce all documents from DOH requiring Cascadia to bring systems into compliance with DOH minimum design standards for each of the eight projects referenced by Cascadia in its response.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

The document from DOH requiring Cascadia Water to bring systems into compliance with DOH minimum design standards for each of the eight projects referenced by Cascadia Water in its response is the DOH Water System Design Manual (UW-240151 WCAW DR 42 Attachment 1). When Cascadia Water undertook each of the eight projects, it was a requirement to make sure that project was in compliance with DOH minimum design standards per section 1.5 Minimum System Design Requirements:

"Design engineers **must** use good engineering practice (as determined by the Washington State Professional Licensing Board) in all aspects of water system design (WAC 246-290-200). The design engineer **must** consider the water system operation under a full range of expected demands (minimum to maximum) and emergency conditions (WAC 246-290-420)." (Emphasis in original).

1.5 Minimum System Design Requirements

Design engineers **must** use good engineering practice (as determined by the Washington State Professional Licensing Board) in all aspects of water system design (WAC 246-290-200). The design engineer **must** consider the water system operation under a full range of expected demands (minimum to maximum) and emergency conditions (WAC 246-290-420). "Emergency" means a natural or man-made event that causes damage or disrupts normal operations and requires prompt action to protect public health and safety. Examples include fires, power outages, water main breaks, water system component or treatment process failures, floods, or recent evidence of contaminated drinking water.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 43

Please produce all documents from a consulting or inhouse Washington state-licensed engineer upon which you rely in contending Cascadia must bring systems into compliance with DOH minimum design standards, for each of the eight projects referenced by Cascadia in its response.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks documents beyond the scope of Cascadia's possession, custody or control as it seeks documents from third-party entities that are not participants in this proceeding. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

We rely on our engineers to design/engineer projects that use current standards (from the DOH Water System Design Manual, WAC 246-290, and local county code) to ensure that adequate service levels are being provided to customers and that installed improvements will support the long-term operation of the system.

The fact that we must bring systems into compliance with DOH minimum design standards is a regulatory/legal reality.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 44

Please produce all documents upon which you rely in contending the DOH Water System Design Manual creates “minimum design standards” that required Cascadia to undertake the eight referenced projects.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it lacks temporal limitations, project limitations, and otherwise requests “all” documents for the systems. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

The eight referenced projects came from a system component failing or needing replacement in one aspect or another. When that occurred, we relied upon a Washington state licensed engineer to design the replacement. As stated in our response to UW-240151 WCAW-42, Section 1.5 Minimum System Design Requirements required d Cascadia Water to undertake the eight referenced projects.

1.5 Minimum System Design Requirements

Design engineers **must** use good engineering practice (as determined by the Washington State Professional Licensing Board) in all aspects of water system design (WAC 246-290-200). The design engineer **must** consider the water system operation under a full range of expected demands (minimum to maximum) and emergency conditions (WAC 246-290-420). “Emergency” means a natural or man-made event that causes damage or disrupts normal operations and requires prompt action to protect public health and safety. Examples include fires, power outages, water main breaks, water system component or treatment process failures, floods, or recent evidence of contaminated drinking water.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 45

DOH states that the Water System Design Manual's purpose and scope is as follows:
Purpose and Scope

"The Department of Health Office of Drinking Water (DOH) developed this Water System Design Manual to establish uniform concepts for water system design and a framework for state-licensed engineers to consistently review design documents.... This manual provides guidelines and criteria for design engineers to use in preparing portions of planning documents (WAC 246-290-100), project reports (WAC 246-290-110), construction documents (WAC 246-290-120), and source approval documents (WAC 246-290-130). This manual also clarifies engineering document submittal and review requirements."

Please explain how you contend DOH's terms "concepts," "guidelines," and "criteria" above constitute "requirements."

Response:

We do not contend that DOH's terms "concepts," "guidelines," and "criteria" above constitute "requirements."

Having said that, it is imperative to note that the question only quotes the very first section 1.0 Purpose and Scope.

More than just the first paragraph applies with this 518-page manual. Reading down a little bit further is instructive.

Section 1.1 Safety, Risk, and Reliability includes the following "This manual identifies design **requirements** and design standards for ensuring safe and reliable drinking water sources and facilities."

Right before section 1.3 is the following: "Many water systems were built before the current minimum design requirements were established in chapter 246-290 WAC. Design engineers **must** use the most recent standards and guidelines when designing new facilities or in planning expansion of an existing system (WAC 246-290 Part 3)."

The section that is literally called 1.3 “Must” (versus “Should”) reads as follows:

1.3 “Must” versus “Should”

Throughout this manual we use “**must**,” “**will**,” “**shall**,” or “**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.

The word “must” appears 532 times in the document, “will” appears 341 times, “Shall” 23 times, and “required” 192 times.

Finally, section 1.6 includes the following: “If information in this manual conflicts with any referenced material, this manual should take precedence for purposes of designing water system facilities to meet our **requirements**.”

To sum up, we do not contend that DOH’s terms “concepts”, “guidelines”, and “criteria” constitute “requirements”. We contend that DOH’s terms “must”, “will”, “shall” and “required” generally constitute “requirements”.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 46

Did Cascadia employ any state-licensed engineer to prepare planning documents, project reports, construction documents and source approval documents for each of the eight referenced projects?

Response:

Yes, Cascadia employed Davido Consulting Group, which later changed its name to Davido/Watershed, and has now changed its name to Facet, for all of the eight referenced projects except the generators.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 47

If so, please produce all planning documents, project reports, construction documents and source approval documents prepared by Cascadia or its consulting engineers, for each of the eight referenced projects.

Response:

Construction plans and project reports are provided for all eight referenced projects except the generators. Please see UW-240151 WCAW DR 47 Attachments 1-10. The two PRV projects for W&B Waterworks #1 were replacements, and therefore do not have project reports, only construction plans.

Note: the CAL Waterworks system loop and CAL Waterworks Reservoir/Booster Pump projects have the same construction plans and project report.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 48

Public Counsel's prior PC IR 3 requested that Cascadia:

"For each of the following assets, please provide a description of the asset and any invoices associated with the asset's construction and implementation. Please explain why the asset was necessary, and if the asset was necessary for Department of Health compliance requirements, please specify which compliance requirements the asset fulfills.

1. CAL Pumphouse (Island) – In service 12/15/2023 at cost of \$1,042,429;
2. Treatment and Res Projects (Island) [Consolidated] – 6/30/2024 at \$1,760,780;
3. Booster and Res Projects (Estates) [Consolidated] – 3/31/2024 at \$1,150,057;
4. Del Bay Project – New Mainline (Island) – 11/1/2023 at \$793,082;
5. WB Creek Crossing / Mutiny Ln Project (Island) – 7/20/2022 at \$178,655;
6. Mutiny Bay PRV (Island) – 9/30/2023 at \$134,363; and
7. R.C. Worst Well (Pelican Point) – 8/15/2023 at \$94,061".

Cascadia responded, in part:

"Please see the confidential attachments for the requested invoices and other documents associated with the following assets".

Please produce all of the "requested invoices and other documents associated with the following assets" previously provided to Public Counsel.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence.

Cascadia Water LLC further objects to the extent this request asks for documents already in the possession and control of WCAW. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

These documents were provided to the WCAW in June 2024.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 49

Public Counsel's prior PC IR 3 requested as follows:

"For each of the following assets, please provide a description of the asset and any invoices associated with the asset's construction and implementation. Please explain why the asset was necessary, and if the asset was necessary for Department of Health compliance requirements, please specify which compliance requirements the asset fulfills.

CAL Pumphouse (Island) – In service 12/15/2023 at cost of \$1,042,429."

Cascadia responded:

"New 80,000-gallon concrete reservoir, pumphouse, booster pump improvements, and system loop for the CAL Waterworks system in Island County.

The system loop was a required improvement since the Water System Plan showed that the system could not provide peak hour demand (PHD) or fire flow (FF) & maximum day demand (MDD) while maintaining minimum pressures. See WAC 246-290-230(5) for pressure requirements for a closed system (such as CAL).

The Booster Pump Improvements: As shown in the Water System Plan, the system could not provide Fire Flow (FF) & Maximum Daily Demand (MDD) while maintaining minimum pressure requirements (WAC) 246-290-230(6). The issue was only exacerbated when trying to comply with DOH standards of providing FF & MDD with the largest pump out of service. The system also did not supply the recommended minimum standby storage volume (See DOH Design Manual Section 7.1.1.3) for the approved number of connections (WAC 246-290-235(3)).

The reservoir was necessary because the existing octagon tank had significant leaks coming from the seams. The pumphouse was necessary because the existing pumphouse would not handle the electrical load or provide enough space for the pumps".

Please produce the Water System Plan referred to above.

Response:

This is the Island County Unified Water System Plan that was provided as an attachment to the Company's response to UW-240151 WCAW DR 36.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 50

WAC 246-290-230(5) applies to design standards for “new public water systems or additions to existing systems”. Please identify any Cascadia water systems that you contend are “new public water systems” or those projects that you contend are “additions to existing systems” (not improvements) and therefore fall within this Code provision.

Response:

To be clear, WAC 246-290-230(5) reads in full: “New public water systems or additions to existing systems shall be designed with the capacity to deliver the design PHD quantity of water at 30 psi (210 kPa) under PHD flow conditions measured at all existing and proposed service water meters or along property lines adjacent to mains if no meter exists, and under the condition where all equalizing storage has been depleted.”

The Del Bay waterline project falls within this Code provision as it was an addition to an existing system (W&B Waterworks #1).



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 51

Has Cascadia expanded the geographical area where direct service connections are available or increased the service connections for the CAL Waterworks System?

Response:

No.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 52

Please produce all documents submitted to DOH per the requirements of WAC 290-246-100 through 140 for this project.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

This is the Island County Unified Water System Plan that was provided as part of the Company's response to UW-240151 WCAW DR 36, and the construction plans and project report that the Company provided with its response to UW-240151 WCAW DR 47.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 53

Please produce all documents by which DOH approved the improvements for this project.

Response:

The approval letter from DOH for the CAL project is provided as UW-240151 WCAW DR 53 Attachment 1.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 54

Please produce all documents upon which you rely in stating “The reservoir was necessary because the existing octagon tank had significant leaks coming from the seams”, including but not limited to records of past repairs, records of leakage, sanitary surveys and engineer reports.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

In the sanitary survey from 2023, provided in the Company’s response to UW-240151 WCAW DR 16, the inspector highlighted in blue a “yes” response to question #85 on page 6: “Does the tank show signs of excessive leakage, significant cracking, or an advanced concrete spalling?” Observations and recommendations identified during the survey included “Consider replacing the reservoir to prevent water loss.” (cover letter, page 2). Within the sanitary survey, there are pictures that also show this (see page “SS Photos 6 per Page 4 Pages”).



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 55

Please explain why you contend: "The pumphouse was necessary because the existing pumphouse would not handle the electrical load or provide enough space for the pumps." Please produce all documents upon which you rely in so contending, including but not limited to the manufacturer, model type, maximum electrical load, and space requirements for the existing and replacement pumps.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding, including the specifications of the pumps. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

The existing pumphouse was setup for a 100-amp service, but the requirements were 195.7/197.4 per the Load Calculations worksheet provided by the electrician, Jerry Beck (Jerry Beck & Co). See, UW-240151 WCAW DR 55 Attachment 1.

Cascadia Water also attached our PSE application as UW-240151 WCAW DR 55 Attachment 2, which shows an increased amp size of 320 to supply adequate power.

Picture UW-240151 WCAW DR 55 Attachment 3 shows "before and after" views.

Picture UW-240151 WCAW DR 55 Attachment 4 displays further evidence of the previous pumphouse, and how there was no room available to add any further infrastructure.

Picture UW-240151 WCAW DR 55 Attachment 5 displays further evidence of the previous pumphouse and how there was hardly enough room to walk between the booster pumps, let alone install anything else or even properly perform routine maintenance.

Cascadia Water's Electrician Jerry Beck, of Jerry Beck & Co, reported that the number and severity of the safety violations were high, and the potential to be shocked was everywhere. Physical access did not comply with the NEC requirements of working space of 36" in front of all electrical items from the floor to the ceiling. In addition, the following pictures and corresponding descriptions from our electrician provide more detail:

UW-240151 WCAW DR 55 Attachment 6 - Wiring hanging from the rafter was not supported; open conductors from the ceiling; pressure switch wiring was not supported or protected.

UW-240151 WCAW DR 55 Attachment 7 - Same issues with wiring to the interior well shaft.

UW-240151 WCAW DR 55 Attachment 8 - Everything in this image is a serious electrical violation and health and safety problem for anyone who is in this building.

UW-240151 WCAW DR 55 Attachment 9 - Main 100 amp panel is overloaded with too many circuits and several are double-landed because there is not enough space.

UW-240151 WCAW DR 55 Attachment 10 - Overall view of the electrical wall. There is no room to stand in any safe location and this was from the beginning as that blue pipe through the floor is original.

UW-240151 WCAW DR 55 Attachment 11 - shows the electrical panel that has a ground wire floating above the main bus of the panel, and wiring prevents a cover to be installed.

UW-240151 WCAW DR 55 Attachment 12 - The existing overhead service mast is bent over and is limited to 100 amps of power due to the meter socket, riser, service lateral and transformer (service equipment).

UW-240151 WCAW DR 55 Attachment 13 - If any of these tree limbs fall on the service wire again it will most likely cause a conductor burnout inside the service mast. This is being replaced with a new underground service line.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 56

Public Counsel made the same request re:

"2. Treatment and Res Projects (Island) [Consolidated]... at \$1,760,780."

Cascadia responded in full:

"New 185,000-gallon concrete reservoir, pumphouse and treatment for the W&B Waterworks system in Island County.

The DOH has required the completion of the reservoir and treatment project in order to provide W&B Waterworks enough capacity to serve the current and committed number of ERUs.

Please provide all documents upon which you rely in stating "DOH has required the completion of the reservoir and treatment project."

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Technically, the document that we rely in stating DOH has required the completion of the reservoir and treatment project is the DOH Construction Completion Form (UW-240151 WCAW DR 56 Attachment 1) as per WAC 246-290-120 (5). Cascadia: the attachment is a blank Construction Completion Report Form. Did you submit a construction project application or document related to this project to DOH for approval?

The instructions on the blank report form state that the report is “required for all approved construction projects.”

To provide more background on this project: As we will state in our testimony, the WB reservoir had significant leaks and needed to be replaced as it was well beyond its service life. As the DOH sanitary survey from 2024 (provided in the Company’s response to UW-240151 WCAW DR 16) quoted: “The older of the two 50,000-gal reservoirs was leaking significantly at the corners. Thank you for planning and replacing the aging infrastructure!”

By undertaking this project, we needed to then make the new reservoir meet the DOH standards in the above-mentioned Water System Design Manual (provided in the Company’s response to UW-240151 WCAW DR 42).

Physically consolidating the Del Bay system into the W&B Waterworks #1 system required an increase in storage capacity (i.e., reservoirs) to deal with the additional service connections.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 57

Define what you mean by “committed” number of equivalent residential units. How many current ERUs in W&B Waterworks? How many “committed” ERUs do you calculate exist in W&B Waterworks?

Response:

“Equivalent residential units” and “service connections” mean the same thing for the purposes of this answer.

“Committed” number of equivalent residential units are customers who have paid for a service connection but are not ready for active water service yet (the most common example is a vacant lot that has not yet built a house).

There are currently 485 current/active ERUs/service connections on the W&B Waterworks water system.

There are also now 37 current/active connections from the Del Bay customers from the system consolidation.

There are currently 23 “committed” ERUs/service connections on the W&B Waterworks system, and an addition 2 “committed” ERUs/service connections from the Del Bay system.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 58

Please produce all documents submitted to DOH per the requirements of WAC 246-290-100 through 140 for this project.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

This is the Island County Unified Water System Plan that was provided in the Company's response to UW-240151 WCAW DR 36, and the construction plans and project report that were provided in the Company's response to UW-240151 WCAW DR 47.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 59

Please produce all documents by which DOH approved the improvements for this project.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

The approval letter from DOH for the W&B Waterworks reservoir/treatment project is provided as UW-240151 WCAW DR 59 Attachment 1.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 60

PC made the same request re:

"5. WB Creek Crossing / Mutiny Ln Project (Island) – 7/20/2022 at \$178,655".

Cascadia responded in full:

"New pressure reducing valve (PRV) on Mutiny Ln on the W&B Waterworks system in Island County.

This was required due to the existing main line crossing the creek over a man-made dam. Temporary repairs made in the past were threatening the viability of the main line so we had to directional drill underneath the creek and install a PRV to keep customers within the pressure perimeters required by DOH."

Please produce all documents upon which you rely in stating DOH required "a PRV to keep customers within pressure perimeters."

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it misrepresents the prior Cascadia Water response to Public Counsel.

To clarify, this was a pre-existing PRV that was replaced due to failure. So the answer provided to Public Counsel should have read "...underneath the creek and install a **replacement** PRV to keep customers within the pressure perimeters required by DOH."

The document upon which Cascadia Water relies to support replacement of the PRV is the Water System Design Manual (provided with the Company's response to UW-240151 WCAW 42).

WAC 246-290.230 provides the minimum service pressures for various demand scenarios which are reiterated in the DOH Water System Design Manual. Section 6.2.7 of the Water System Design Manual states, "Working pressure in the distribution system should be limited to 80 psi ..."



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 61

Please provide all documents evidencing “temporary repairs”, including but not limited to repair contracts, invoices, and boil notices, if necessary.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it lacks temporal limitations, project limitations, and otherwise requests “all” documents.

Most of the temporary repairs mentioned in Cascadia Water’s previous response were done by the prior owner of the system (prior to Cascadia Water’s acquisition in November 2018).

Cascadia Water paid \$3,004.47 to Madsen Enterprise, Inc. from a bill dated 1/11/2021 for “Main break repair at creek crossing.” This is attached as UW-240151 WCAW DR 61 Attachment 1.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 62

Please produce all documents submitted to DOH per the requirements of WAC 290-246-100 through 140 for this project.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Per WAC 246-290-125 "The following projects do not require project reports under WAC 246-290-110, and construction documents under WAC 246-290-120, to be submitted to the department for review and approval prior to installation:...

(c) Repair of a system component or replacement with a component of a similar capacity and material in accordance with the original construction specifications of the approved design."

This project replaced a system component of a similar capacity and material in accordance with the original system approved design; therefore, there are no documents to produce for this request.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 63

Please produce all documents by which DOH approved the improvements for this project.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Please see the Company's response to UW-240151 WCAW DR 62.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 64

Public Counsel made the same request re:

"6. Mutiny Bay PRV (Island) – 9/30/2023 at \$134,363"

Cascadia responded in full:

"New pressure reducing valve (PRV) on Mutiny Bay Rd on the W&B Waterworks system in Island County.

This was required due to the age of the previous PRVs that were no longer operational and capable of allowing Fire Flow."

Do you contend DOH required a new PRV? Please produce all documents upon which you rely in so contending. stating DOH required a PRV to keep customers withing pressure perimeters required by DOH."

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it misrepresents the prior Cascadia Water response to Public Counsel.

As stated in the Cascadia Water response to UW-240151 WCAW DR 60: Cascadia Water relies on the Water System Design Manual (provided with the Company's response to UW-240151 WCAW DR 42).

WAC 246-290.230 provides the minimum service pressures for various demand scenarios which are reiterated in the DOH Water System Design Manual. Section 6.2.7 of the Water System Design Manual states, "Working pressure in the distribution system should be limited to 80 psi ..."



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 65

Please provide all documents evidencing the past PRVs “were no longer operational”, including but not limited to repair contracts, invoices, and boil notices, if necessary, engineer reports and manufacturer, model type, useful life and specifications for the existing PRV and replacement PRV.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it requests “all documents” including contracts, invoices, boil notices, and the manufacturer, model type, useful life and specifications for the past or existing PRVs. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

The evidence that the past PRVs “were no longer operational” is that operators were unable to perform routine maintenance on the valves, due to the condition of the valves. The valves were also not operating properly by letting adequate flow through them, which was evident to operators during flushing. Due to the age and the amount of corrosion on these PRVs, the decision was made to replace them. The new vaults that were installed also improved operator safety. The prior wood vaults had deteriorated and were virtually non-existent.

Cascadia Water did not keep or record the old PRV manufacturer make/model type, etc. There was one large PRV and one smaller PRV at the Mutiny Ln creek crossing. There were three smaller PRVs in a wooden vault at the Mutiny Bay Road location.

The new make and model for the Mutiny Ln PRV is CLA-VAL Co, stock #, 90-01-4546J, size 4”

The new make and model for the Mutiny Bay Rd PRV is CLA-VAL Co, stock # 90-01-5301H, size 4"

Pictures of the replacement PRVs have been provided as UW-240151 WCAW DR 65 Attachments 1 and 2.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 66

Please produce all documents submitted to DOH per the requirements of WAC 290-246-100 through 140 for this project.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

This is the same response as the Company provided for UW-240151 WCAW DR 62.

Per WAC 246-290-125 "The following projects do not require project reports under WAC 246-290-110, and construction documents under WAC 246-290-120, to be submitted to the department for review and approval prior to installation:...

(c) Repair of a system component or replacement with a component of a similar capacity and material in accordance with the original construction specifications of the approved design."

This project replaced a system component of a similar capacity and material in accordance with the original system approved design; therefore, there are no documents to produce for this request.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 67

Please produce all documents by which DOH approved the improvements for this project.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

This is the same response as the Company provided for UW-240151 WCAW 63.

As follow-up to our answer to UW-240151 WCAW DR 62 (and now also UW-240151 WCAW DR 66), there was no DOH approval as this was a replacement project.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024
Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 68

Public Counsel's prior Request PC IR 4 states:

"Please identify whether the Company has any specific planned future water system acquisitions. If no specific acquisitions are planned, does the Company maintain its position from its 2021 GRC that it is open to expansion and "continuing to look for the acquisition of other assets to further spread costs"1?

Cascadia's Response states:

"The Company does not currently have any specific planned water system acquisitions. The Company does maintain its position from its 2021 GRC that it is open to expansion and is continuing to look for the acquisition of other assets to further spread costs".

Please supplement your answer if Cascadia has recently made any water system acquisitions or "has any specific planned future water system acquisitions".

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

There is nothing to supplement from Cascadia Water's original response to UW-240151 PC IR 4.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 69

Public Counsel's prior PC IR 6 requests:

"For each of the Company's major water systems (Seaview/Lehman, Estates/Monterra, Pedersen, NWWS, Aquarius, Discovery Bay, Pelican Point), please provide an estimate of the dollar value of the outstanding investment required to bring the system into compliance and full working order. For example, during its 2021 GRC, the Company estimated approximately \$5 million would be necessary to bring its Estates system into full working order".

Cascadia's Response states:

"We are unable to provide a system-by-system estimation in the format being requested. Instead, we have projected spending \$3-\$4 million each year for the next five years to focus solely on bringing source/storage components into compliance across all of the existing systems. This does not account for water main line replacement (to combat water loss and conservation), nor does this include any projections for potential PFAS filtration or future changes to DOH/EPA maximum contaminate levels related to water quality".

For each of the aforementioned systems "please provide an estimate of the dollar value of the outstanding investment required to bring each system into compliance and full working order" in whatever "format" you can.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding to the extent it requests projections that are not at issue in this case.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 70

Has Cascadia prepared any capital improvement plans for past or future improvements of individual or grouped systems?

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it requests information regarding projects and projections that are not at issue in this case and it lacks temporal limitations. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Yes. These are in the Island County Unified Water System Plan (provided in the Company's response to UW-240151 WCAW DR 36) and the Southwest Water System Plan (Estates, Monterra, Diamond Point, Discovery Bay Village). As stated in the Company's response to UW-240151 WCAW DR 36, the Southwest Water System Plan was submitted to DOH in June 2024. It is still in the review stage with DOH and has not reached the public comment stage. Cascadia Water will provide the Southwest Water System Plan at the public comment stage.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 71

Please produce all capital improvement plans for past or future improvements of individual or grouped systems.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it requests information regarding projects and projections that are not at issue in this case and it lacks temporal limitations. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Please see the response to UW-240151 WCAW DR 70.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 72

If Cascadia has not prepared capital improvement plans for future improvements of individual or grouped systems explain how you “have projected spending \$3-\$4 million each year for the next five years”?

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it requests information on projects and projections that are not at issue in this case. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water has prepared capital improvement plans; see the Cascadia Water response to UW-240151 WCAW DR 70.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 73

Please produce all such projections.

Response:

Cascadia Water LLC objects to this request as overbroad, vague, lacks specificity, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it requests information regarding projects and projections that are not at issue in this case.

See the Cascadia Water LLC response to WCAW DR 70.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024
Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 74

Please produce all documentation you relied upon in such projections, including, but not limited to, engineer reports and designs, budgets, construction bids, chronology of planned construction, cost/benefit analyses, and analyses of impact on consumers and consumer rates.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it refers to all documentation including construction bids, chronology of planned construction, analyses of impact on consumers and consumer rates. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it requests information regarding projects and projections that are not at issue in this case.



Rates & Regulatory Affairs
UW-240151

Cascadia Water LLC Proposed General Rate Case
Data Request Response

Date of Response: 9/25/2024
Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 75

Public Counsel issued PC IR 14 as a supplement to PC IR 3 and requested:

"Please provide documentation, including any relevant communication from the Department of Health, supporting the claim in PC IR 3 NWN Response (Part 4) that "the mains had to be replaced due to existing poor water quality on the Del Bay system as well as aging infrastructure, leaks and inaccessible main line locations." If the Del Bay system was out of compliance prior to the mains replacement, please reference specific compliance standards that the system did not meet."

Cascadia responded in part:

"When the Del Bay Water System (PWS ID # 18575K) was purchased by Cascadia Water, the system had a history of distribution system leakage (DSL) over 10%, which requires an action plan to reduce this leakage (WAC 246-290-820.)"

Please produce all documents which establish "a history of distribution system leakage (DSL) over 10%".

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, and to the extent it seeks documents or information beyond the scope of Cascadia's possession, custody or control as it seeks documents regarding third-party entities that are not participants in this proceeding. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

A copy of the Water Use Efficiency report from 2019 (UW-240151 WCAW DR 75 Attachment 1) shows a DSL of 14.1% (over 10%).

The previous owner of the system was a Homeowners Association (HOA) that contracted a Satellite Management Agency (SMA) to manage their system and their record keeping system was incomplete. The previous executive board for the HOA spoke at great length about the constant leaks and repairs to the system.

See also UW-240151 WCAW DR 95 Attachment 1, numbered page 7 ("The waterline serving the homes along Mutiny Sands Road has experienced leaks and the current location of the distribution piping makes repairs difficult. When this line is replaced it should be relocated to the road right of way to facilitate maintenance and the reading of service meters. This line should be a minimum of 6" diameter to support fire flow.")



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024
Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 76

Please produce the referenced “action plan”.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, and to the extent it seeks documents or information beyond the scope of Cascadia’s possession, custody or control as it seeks documents regarding third-party entities that are not participants in this proceeding. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

The previous owner did not provide an action plan.

As stated in our response to Public Counsel, which was quoted in the section prior to the question for UW-240151 WCAW DR 78:

“Cascadia Water’s action plan was the replacement of existing distribution piping.”



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 77

Please produce any documents reflecting to whom the referenced action plan was submitted and their approval of same.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

This project was completed as a submittal exemption for distribution main extensions consistent with WAC 246-290-125 (2). Therefore, there is no project report or approval document from DOH to provide.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 78

Cascadia also responded:

"Cascadia Water's action plan was the replacement of existing distribution piping. This decision was based on several factors including:

- Lack of established easements to be able to legally access portions of the existing distribution piping for servicing and repairs.
- History of frequent leak repairs to the distribution piping by the previous system owners, indicating that the pipe has reach (sic) the end of its serviceable life.
- Existing distribution piping not being in compliance with the requirements of Island County Code 13.03A."

Please produce all documents upon which you rely that establish where along the pipeline there is a lack of easements sufficient for servicing and repairs.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is outside the possession or control of Cascadia Water LLC. Cascadia Water LLC further objects to this request to the extent it lacks temporal limitations. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Discussion with the executive board of the HOA that previously owned the system is what first advised Cascadia Water that there were no easements.

The plat map for Del Bay also confirms there are no easements on customer properties, with the exception of lots 35 & 36 on Timber Lane. One section of plat map is Del Mar

Vista, which is Mutiny Sands Rd – this is where the water line runs along the back portion of the lots. The other map for Baywood (where the only easements are on lots 35 and 36), which in this case extends the main from the pumphouse out to the right of way. Please see UW-240151 WCAW DR 78 Attachments 1 and 2.

See also UW-240151 WCAW DR 95 Attachment 1, numbered page 7 (“The waterline serving the homes along Mutiny Sands Road has experienced leaks and the current location of the distribution piping makes repairs difficult. When this line is replaced it should be relocated to the road right of way to facilitate maintenance and the reading of service meters. This line should be a minimum of 6” diameter to support fire flow.”)



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 79

Please produce all documents demonstrating that Cascadia or Del Bay's prior owner 1) ever requested access to and 2) was ever denied access to areas of piping for servicing and repairs. If no such request or denial was reduced to writing please identify when and by whom such request was made and who denied such request.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is outside the possession or control of Cascadia Water LLC. Cascadia Water LLC further objects to this request to the extent it lacks temporal limitations. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water does not have any documents that are responsive to this question. Cascadia Water does not have access to the prior owner's documentation, and nothing was reduced to writing for Cascadia Water.

Cascadia Water was not able to access the water main line easily due to garages, sheds, fences, landscaping, etc. There were also times when customers refused to move vehicles for Cascadia Water to bring equipment in order to repair leaks. Cascadia Water does not have specific dates or property owner information to provide.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 80

Please produce all documents upon which you rely that demonstrate a “history of frequent leak repairs ... indicating that the pipe has reach (sic) the end of its serviceable life”, including but not limited to repair contracts, repair invoices and boil notices.

Response:

Cascadia Water LLC objects to this request as overbroad and unduly burdensome because it requests “all documents.” Cascadia Water LLC also objects to this request to the extent it seeks documents or information beyond the scope of Cascadia’s possession, custody or control as it seeks documents from third-party entities that are not participants in this proceeding. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

The previous owner of the system did not provide this type of documentation to Cascadia Water although the previous owner did report a history of frequent leak repairs to Cascadia Water. The Cascadia Water employees that performed the repairs were able to observe the condition of the pipe.

Repairs were made by Cascadia Water employees; therefore, there were no repair contracts or invoices.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 81

Please produce any reports of any engineers, consultants or others upon which you relied in determining “the pipe has reach (sic) the end of its serviceable life”.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it requests “any reports” from “any” engineers, consultants or others. Without waiving the foregoing objections, Cascadia Water LLC responds as follows

Cascadia Water LLC has no engineers, consultants, or other reports to provide. The previous response did not refer to such reports. The Cascadia Water operations employees were able to observe the condition of the relevant pipe.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 82

Please produce all photos upon which you relied in determining “the pipe has reach {sic} the end of its serviceable life”.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it requests “all photos.” Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water has no photos to provide and photos were not referred to in the quoted response.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 83

Please produce all documents upon which you rely in stating that the existing piping was not in compliance with requirements of Island County Code 13.03A, and identify with particularity said "requirements" to which you allude.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it requests "all documents." Without waiving the foregoing objections, Cascadia Water LLC responds as follows

See UW-240151 WCAW DR 83 Attachment 1.

APPENDIX G PROPOSED NEW CHAPTER 13.03A (REVISED 8/1/89) MINIMUM STANDARDS FOR WATER WORKS

Island County Code 13.03A.080 B. **Pipe sizing.** "All piping sizes shall conform to WAC 246-290. However, in no case shall water mains be less than six (6) inches diameter"

Not documented is the fact that the system was running over 300 feet with 2" line. The pipe is ABS pipe, typically used in internal household plumbing, sewer and stormlines, and non-standard 61 fittings were used for previous repairs of this pipe.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 84

Please produce the current and any historical water system plans for Del Bay.

Response:

Cascadia Water LLC objects to this request as overbroad and unduly burdensome because it requests information without any temporal limitation. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

No known Water System Plan was prepared by the previous owners of Del Bay. Cascadia Water is in the process of incorporating Del Bay into the W&B Waterworks #1 system, which is part of the Island County Unified Water System Plan, provided in the Company's response to UW-240151 WCAW DR 36.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 85

Please produce with respect to Del Bay, as required by Island County Code 13.03, “a copy of specifications, maps, and drawings for the water system which shall contain the following information as a minimum: (a) Location and size of all mains and service lines. (b) Location of all valves, fire hydrants, blowoffs, air release valves, check valves, and other equipment. (c) Well site location, pollution control area and associated Auditor's File Number, buildings, culverts, ditches, streams, ponds, and other physical features within or affecting the control area must be shown”.

Response:

Cascadia Water LLC objects to this request to the extent it calls for a legal conclusion and because it is not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which had not been filed at the time this request was issued. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

See UW-240151 WCAW DR 85 Attachment 1, which is the Del Bay main line replacement project construction plans.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Counsel

Request No.: UW-240151 WCAW DR 86

Please produce all documents relied upon by Cascadia in deciding to purchase the Del Bay system, including, but not limited to, (a) purchase and sale agreements, (b) due diligence documents by which Cascadia evaluated the state of disrepair at Del Bay, including consultant or engineering reports, (c) DOH or other governmental surveys, reports, notices or other documents regarding disrepair, non-compliance, code violations and/or water quality at Del Bay, and (d) any capital plans, budgets or other documents prepared by Cascadia in assessing anticipated future improvements for Del Bay.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it requests information regarding the purchase and sale of a system, the approval of which is not subject to this proceeding. Cascadia Water LLC further objects to this request as expanding the scope of this proceeding by requesting projections and evaluations that are not at issue in this case and it lacks temporal limitations. Cascadia Water LLC further objects to this request to the extent it seeks information that is outside the possession or control of Cascadia Water LLC.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 87

Cascadia also responded:

"The water quality on the Del Bay system was also significantly over the MCL for manganese and iron. Most recent samples are attached as UW-240151 PC IR 14, Attachment 1. The system was also on disinfection using hypochlorite/chlorination due to a faulty reservoir and infrastructure."

Please identify what MCL you are referring to and produce all documents that support your contention that the Del Bay system exceeded "the MCL for manganese and iron".

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

The first part of this question, as it relates to manganese, is a duplicate from UW-240151 WCAW DR 19. ("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.") Answers to the manganese portion were provided in response to that request.

WAC 246-290-310 (provided in the Company's response to UW-240151 WCAW DR 19) lists the MCL for iron.

The MCL for Iron is listed on Table 5 from the EPA. Cascadia Water is not including this as an attachment, but can be found at the following link:

<https://www.epa.gov/sdwa/secondary-drinking-water-standards-guidance-nuisance-chemicals#table-of-secondary>

This is also included in the Code of Federal Regulation (CFR) 143.3 Secondary maximum contaminant levels, which Cascadia Water is not including as an attachment, but can be found at the following link: <https://www.ecfr.gov/current/title-40/section-143.3>

We attached a copy of the sample detail information from 12/13/2022 (UW-240151 WCAW DR 87 Attachment 1). The results in the columns for "Result Quantity" being higher than the column that says "Maximum Contaminant Level" is what supports our contention that the Del Bay system exceeded the MCL for manganese and iron.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 88

Please produce "Attachment 1." We have made a good faith search of Cascadia's supplemental production and cannot find same.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it requests information regarding the purchase and sale of a system, the approval of which is not subject to this proceeding. Cascadia Water LLC further objects to this request as expanding the scope of this proceeding by requesting projections and evaluations that are not at issue in this case and it lacks temporal limitations. Cascadia Water LLC further objects to this request to the extent it seeks information that is outside the possession or control of Cascadia Water LLC. Subject to and without waiving its objections, Cascadia Water states as follow:

Please see Cascadia Water's response to UW-240151 WCAW DR 87.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 89

Please produce “the MCL for manganese and iron” you are referring to.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information that is beyond the scope of this proceeding because it requests information regarding the purchase and sale of a system, the approval of which is not subject to this proceeding. Cascadia Water LLC further objects to this request as expanding the scope of this proceeding by requesting projections and evaluations that are not at issue in this case and it lacks temporal limitations. Cascadia Water LLC further objects to this request to the extent it seeks information that is outside the possession or control of Cascadia Water LLC. Subject to and without waiving its objections, Cascadia Water states as follow:

Please see the Company’s response to UW-240151 WCAW DR 87.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 90

Please produce all documents upon which you rely in stating the system “was also on disinfection...due to a faulty reservoir and infrastructure”, including, but not limited to, any consultant or engineering reports, governmental surveys, reports, notices or other documents, which associate use of disinfection with “a faulty reservoir and infrastructure”.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks documents or information beyond the scope of Cascadia’s possession, custody or control as it seeks documents from third-party entities that are not participants in this proceeding. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Cascadia Water does not have any documents to produce for this request. Design information on the chlorination system was not provided to Cascadia Water from this system’s previous owner. The previous requirements and design are being requested from DOH. The anticipated delivery from DOH is six months. This information will be forwarded once received.

Previous water system operational experience led the Cascadia Water general manager to conclude that due to the fact that the well has a surface seal, is surrounded by concrete, and is inside a completely sealed building, the only source of contaminant would be the reservoir or infrastructure.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024
Responder/Witness: Matt Rowell

Request No.: UW-240151 WCAW DR 91

Cascadia also responded to PC IR 14:

"The mainline replacement was also necessary for consolidation into the larger neighboring WB system, which gave the system a gravity-fed source with better water quality, as well as fire flow and the addition of fire hydrants".

Why did you conclude consolidation of the Del Bay system into the WB system was reasonable, necessary and prudent?

Response:

To be clear, the response to UW-240151 PC IR 14 refers to the physical connection of the Del Bay and WB systems. Rates for these systems were consolidated into the Island Systems tariff in Cascadia's last rate case. Cascadia Water concluded that physically connecting the Del Bay System to the WB systems was reasonable, necessary and prudent because it gave the Del Bay system a gravity-fed source with better water quality, as well as fire flow and the addition of fire hydrants.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 92

Please produce all documents, including but not limited to, consultant reports, construction bids, engineering plans, budgets, capital improvement plans and governmental surveys, reports or notices, which led you to conclude consolidation of the Del Bay system into the WB system was reasonable, necessary, and prudent.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it requests "all documents" including construction bids, budgets, and governmental surveys, reports or notices. Without waiving the foregoing objections, Cascadia Water LLC responds as follows

Chapter 10: General Water Treatment, Section 10.0 Introduction of the Water System Design Manual (provided in the Company's response to UW-240151 WCAW DR 42) includes the following: "Considering these factors, alternatives such as consolidating with a nearby system ... often are better long-term approaches to protect public health than constructing a treatment facility." Cascadia Water determined that consolidation of the systems was a better long-term approach than constructing a treatment facility for the Del Bay system.

In addition, it is consistent with industry standards for smaller systems to be consolidated into bigger systems if/when possible.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024
Responder/Witness: Matt Rowell

Request No.: UW-240151 WCAW DR 93

Please produce all documents memorializing options you considered in deciding to consolidate the systems, including but not limited to, consultant reports, construction bids, engineering plans, budgets, capital improvement plans and governmental surveys, reports or notices.

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it requests "all documents" including construction bids, engineering plans, and governmental surveys, reports or notices. Cascadia Water further objects to this request as vague because it does not identify with specificity the "systems" that are the subject of the request. Without waiving the foregoing objections, Cascadia Water LLC responds as follows

Cascadia Water is in the process of gathering the requested documents and will supplement this response accordingly by Wednesday, October 2, 2024.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 94

Please produce all documents upon which you relied to determine that installation of “sample stations” was reasonable, necessary and prudent, including but not limited to, consultant reports, construction bids, invoices, engineering plans, and governmental surveys, reports or notices

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it requests “all documents” including construction bids, invoices, and governmental surveys, reports or notices. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Coliform monitoring is a required operation that water systems must perform. Historically, water samples were obtained from individual customers’ homes. This creates operational issues as homeowners may deny access, the homeowners may not be home to allow access, the water system does not maintain piping on private property, so lack of maintenance on homeowners’ piping may impact test results, etc. To provide more consistent control on the testing process, sampling stations are being installed. This will allow Cascadia Water complete access to the test locations and full control over the piping system to these sample locations to ensure that the samples obtained are representative of the water in the distribution system.

Section “6.4.5 Sample Stations” of the Water System Design Manual (provided in the Company’s response to UW-240151 WCAW DR 42) reads as follows: “Design engineers should put sampling stations in locations where water systems can collect representative water quality samples from the distribution systems. We recommend the following sampling station features: 1. Use distribution piping, not household plumbing. 2. The sampling location should be in an active part of the distribution system. 3. The water system should have control (ownership) of the location or sample station.”



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 95

Please produce all documents memorializing complaints by Del Bay customers of low water pressure during times of peak demand.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks documents or information beyond the scope of Cascadia's possession, custody or control as it seeks documents from third-party entities that are not participants in this proceeding. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Please see UW-240151 WCAW DR 95 Attachment 1, which is an engineering report for the Del Bay system prepared for the Del Bay HOA before Cascadia Water LLC purchased the Del Bay system. The report documents the low-pressure issues on page 5.

Concerns about low water pressure were expressed by the executive board of the Del Bay system's former owner during the acquisition process, along with other verbal comments provided by Del Bay customers.



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 96

Please produce all documents upon which you relied in concluding “blowoffs” and “locate wire” were reasonable, necessary and prudent, including but not limited to, consultant reports, construction bids, invoices, engineering plans, and governmental surveys, reports or notices

Response:

Cascadia Water LLC objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Cascadia Water LLC further objects to this request to the extent it seeks information not relevant to the litigated proceeding and the testimony in this case, which has not been filed at the time this request was issued. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

Blow-offs are needed in distribution system piping to support system disinfection and to aid in flushing. Section 6.4.3 Flushing Valves, Blow-offs and Hydrants of the Water System Design Manual (provided in WCA-42) reads as follows: “To allow sufficient flushing and proper disinfection of distribution mains, engineers should install blow-offs, automatic flushing stations, or hydrants at low points and deadends in the distribution system.”

Island County requires blow-offs per: ICC 13.03A.080 (provided in WCA-83) H. Blow-off assembly. “A blow-off assembly shall be installed on all dead-end runs and at designated points of low elevation within the distribution system.”

Water utilities are required to participate in the utility locator service to locate water lines or other utilities in the right of way to prevent accidental impacts to these buried features. The locator wires also aid the system in locating the water line for repairs to minimize downtime.