

**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 148-161



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 1/3/2025
Witness/Responder: Culley Lehman
Telephone: 360.661.7781
Email: culley@cascadiawater.com

Request No.: UW-240151 WCAW DR 148

Please confirm that DOH has not yet approved the Estates Water System Plan.

Response:

Cascadia Water LLC objects to this request as unreasonably cumulative or duplicative and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, Cascadia Water responds as follows:

The DOH has not yet approved the Southwest Region Water System Plan that was filed in June 2024. Please see Exh. CLJ-1T, pages 32-33, including Table 3 (Status of Master Plans for Each 'Community') for background and current status.



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Date of Response: 1/3/2025
Witness/Responder: Culley Lehman
Telephone: 360.661.7781
Email: culley@ascadiawater.com

Request No.: UW-240151 WCAW DR 149

Please advise whether Cascadia has submitted any other Water System Plan for any of its other water systems to DOH for consideration and approval.

Response:

Cascadia Water LLC objects to this request as unreasonably cumulative or duplicative and not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding these objections, Cascadia Water responds as follows:

Please see Exh. CLJ-1T, pages 32-33, including Table 3 (Status of Master Plans for Each 'Community') for background and current status.



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Telephone: 360.661.7781
Email: culley@cascadiawater.com

Request No.: UW-240151 WCAW DR 150

Please produce copies of all Water System Plans Cascadia has submitted to DOH for consideration and approval for its other water systems.

Response:

Cascadia Water LLC objects to this request as unreasonably cumulative or duplicative and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, Cascadia Water responds as follows:

Please see Exhibit CJL-9 (Island County Unified Master Plan) and the Company's responses to UW-240151 WCAW DRs 36 and 70. Further, it is our understanding that the Water Consumer Advocates of Washington already has a copy of the Southwest Region Water System Plan that the Company filed in June 2024 that currently is under DOH review.



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Witness/Responder: Culley Lehman
Telephone: 360.661.7781
Email: culley@cascadiawater.com

Request No.: UW-240151 WCAW DR 151

Please advise whether Cascadia has retained a licensed professional engineer to prepare a Water System Plan for any of its other water systems.

Response:

Cascadia Water LLC objects to this request as unreasonably cumulative or duplicative and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, Cascadia Water responds as follows:

Please see Exh. CLJ-1T pages 32-33, including Table 3 (Status of Master Plans for Each 'Community'). For the referenced systems that do not have a current master plan and are not part of the Southwest Region Water System Plan that was filed in June 2024 and is currently under DOH review, Cascadia Water has not retained a licensed professional engineer to prepare a water system plan for such systems.



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Email: culley@cascadiawater.com

Request No.: UW-240151 WCAW DR 152

If so, please identify: a) the engineer or engineering firm retained, b) the water system(s) to which said retention applies, c) the date of retention, d) the scope of retention, e) the date by which Cascadia expects to submit the draft WSP to DOH, and f) the lead engineer for the project.

Response:

Cascadia Water LLC objects to this request as unreasonably cumulative or duplicative and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, Cascadia Water responds as follows:

Not applicable.



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Telephone: 360.661.7781
Email: culley@cascadiawater.com

Request No.: UW-240151 WCAW DR 153

Please produce all retention agreements identified, if any, in your response to the preceding Data Request.

Response:

Cascadia Water LLC objects to this request as unreasonably cumulative or duplicative and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, Cascadia Water responds as follows:

Not applicable.



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Data Request Response

Date of Response: 1/3/2025

Responder: Perkins Coie LLP (by Pamela Anderson and Byron Starkey)

Telephone: 425.635.1417, 425.636.1458

Email: pjanderson@perkinscoie.com, byronstakey@perkinscoie.com

Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 154

Please produce whatever documents Cascadia has by which Cascadia projects 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 to the extent it requests projections that are not at issue in this case. Cascadia Water LLC also objects to this request as unreasonably cumulative or duplicative of previous requests.



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Date of Response: 1/3/2025
Responder: Perkins Coie LLP (by Pamela Anderson and Byron Starkey)
Telephone: 425.635.1417, 425.636.1458
Email: pjanderson@perkinscoie.com, byronstakey@perkinscoie.com
Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 155

Please identify those capital improvement projects which Cascadia anticipates undertaking over the next five years and which Cascadia projects will cost over \$100,000, including for each project, a) the water system involved, b) the nature of the project, c) the current estimated cost of the project, d) the engineer, if any, involved to date in the project, and e) why the project is needed.

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. Cascadia Water LLC also objects to this request as unreasonably cumulative or duplicative of previous requests.



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Telephone: 425.635.1417, 425.636.1458

Email: pjanderson@perkinscoie.com, byronstakey@perkinscoie.com

Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 156

Please produce whatever documents Cascadia has which prioritize said capital improvements.

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. Cascadia Water LLC also objects to this request as unreasonably cumulative or duplicative of previous requests.



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Telephone: 425.635.1417, 425.636.1458

Email: pjanderson@perkinscoie.com, byronstakey@perkinscoie.com

Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 157

Please produce all documents regarding any evaluation or analysis of the need, cost, cost effectiveness, scheduling, and relative priority of each 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 to the extent it requests projections that are not at issue in this case.



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Telephone: 425.635.1417, 425.636.1458
Email: pjanderson@perkinscoie.com, byronstakey@perkinscoie.com
Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 158

For each currently ongoing water system project which Cascadia projects will cost \$100,000 or more to bring “source/storage components into compliance across all of the existing systems”, please identify: a) a name by which the parties can jointly identify the project, b) the water system involved, c) the scope of the project, d) the licensed engineer involved in the project, e) whether and when bids for the project were received, f) whether and when a contract was awarded for the project, g) the amount of the contract, h) the general contractor retained for the project, i) when the project began, j) the anticipated completion date of the project, k) whether the project has experienced cost overruns or schedule delays, l) whether the project was submitted to DOH for approval prior to commencement, m) whether Cascadia or any outside consultant analyzed alternative approaches to the perceived problem, n) whether Cascadia or any outside consultant analyzed the potential rate impact on customers of the project, and o) whether Cascadia or any outside consultant asked for customer opinions about the 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 to the extent it requests projections that are not at issue in this case.



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Email: pjanderson@perkinscoie.com, byronstakey@perkinscoie.com
Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 159

Please produce all documents relevant to each project identified above, including but not limited to, engineer retention contract, engineer project details, engineer design specifications, requests for competitive bids, all bids received, the award of project, the project contract, all communications with DOH, including those documents defined in various subsections of WAC 246-290, and all communications with the contractor related to cost overruns or schedule delays.

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.



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Telephone: 360.661.7781
Email: culley@cascadiawater.com

Request No.: UW-240151 WCAW DR 160

With respect to each of the 14 projects discussed in CJL 1T pp. 9-10 please state 1) The date project plans were submitted to DOH for approval; 2) the project case number given by DOH for the project, 3) the date that project plans were approved by DOH.

Response:

Please see UW-240151 WCAW DR 160 Attachment 1.



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Date of Response: 1/3/2025

Responder: Perkins Coie LLP (by Pamela Anderson and Byron Starkey)

Telephone: 425.635.1417, 425.636.1458

Email: pjanderson@perkinscoie.com, byronstakey@perkinscoie.com

Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 161

Please produce copies of all communications between Cascadia and DOH regarding each of the 14 projects, including but not limited to correspondence, emails, telephone messages, and meeting notes.

Response:

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