

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADIA WATER, LLC

Respondent.

DOCKET UW-240151

**CROSS-EXAMINATION EXHIBIT OF RACHEL STARK
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT RS-__X

Staff Discovery Response to WCAW DR 27

February 6, 2025

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 10, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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DATA REQUEST NO. 27:

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

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

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

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

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

RESPONSE:

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