

**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 39 Supp.

February 6, 2025

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: January 14, 2025 DOCKET: UW-240151 REQUESTER: WCAW		WITNESS: Rachel Stark RESPONDER: Rachel Stark TELEPHONE: 360-664-1272
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DATA REQUEST NO. 39:

Introduction to WCAC DR 32-64. These data requests refer to and incorporate by reference the following TESTIMONY OF RACHEL STARK Exh. RS -1T, p. 4.

“Q. How does Staff determine whether a cost or expense was prudently incurred?

A. Staff follows established regulatory principles and considers whether the company acted reasonably based on what the company knew, or should have known, at the time it made the decision to incur the cost. To do so, Staff looks at, among other things, whether the expense was necessary, whether the company considered alternatives, and whether the company documented its decision-making process for later review”.

These data requests relate to whether Staff applied the standard above to each of the 14 projects Cascadia identifies as “major”. See CJL 1T pp. 9-10 (hereinafter “Cascadia’s major capital improvements”. These data requests speak to all Staff efforts, not just those of Ms. Stark.

Please produce all documentation memorializing Staff’s analysis of and conclusion that each of Cascadia’s major capital improvements was necessary.

RESPONSE:

Please see Attachment A to this data request, which contains photos from Staff’s site visit. Please see Attachment B to this data request, which contains a copy of the Sanitary System Survey.

Please see Attachment C to this data request, which contains a copy of DOH response letter to Sanitary System Survey.

Please see Attachment D to this data request, which contains copies of invoices reviewed by Staff.

SUPPLEMENTAL RESPONSE:

Attachment A was provided on January 10, 2025.

Attached please find the following attachments:

Attachment B to this data request, which contains a copy of the Sanitary System Survey and the DOH response letter. (Note, the January 10, 2025 response identified the Sanitary

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System Survey and DOH response letter in two separate attachments. These documents are in one file and are provided together.)

Attachment C to this data request, which contains a copy of the invoices related to the Western water systems (Peninsula and Island). **This attachment contains confidential information.**

Attachment D to this data request, which contains a copy of the invoices related to the Pelican Point water system. **This attachment contains confidential information.**