

**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 142

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
---	--	---

DATA REQUEST NO. 142:

When did you become aware that Cascadia replaced reservoirs (Major Projects 3, 7 and 8 per CJL 1T p. 9) with systems designed for greater capacity than that needed for either existing connection or approved connections?

RESPONSE:

Staff is aware of the argument that has been made by other parties about certain reservoirs being designed for greater capacity than needed for exiting or approved connections. Staff conducted site visits on April 22 and 23, 2024, and observed the new construction for projects 3 and 7 on those days. Staff reviewed the costs for all three projects as submitted in the Company filing on February 29, 2024. Staff's investigation did not require any determinations about the capacity of the infrastructure for projects 3, 7, or 8, or whether that capacity "exceeded what was needed for existing connections or approved connections". Staff's only requirements for rate setting was to determine whether the infrastructure complied with DOH requirements for those systems and to verify the cost of the infrastructure, which it did.