

is critical that Cascade provide information that informs the public review of its proposal to spend

\$150,000 on conservation.

Similarly, the proposed \$800,000 expenditure for low income assistance is unsupported in the filing. Additionally, proposed rate designs and changes to specific fees and charges will influence significantly investments in energy efficiency and low income customer's ability to pay for Cascade's services. In its initial filing (JTS-1T, pages 15-18 as example), Cascade notes that proposed changes in rates for disconnection visits, fees for returned checks and a late payment charge will make "the subsidy paid by other customers much smaller" but does not indicate the impact these changes will have on low income customers.

As Public Counsel notes in Section F of its motion, the filing of data requests is an inadequate remedy for the lack of information included in Cascade's initial filing. If Cascade does not supplement its initial filing, the company's "burden of proof" is shifted to the public, information included in data requests will not directly be entered in the record, and the opportunity for parties to examine the reasons for and impacts of Cascade's proposals is significantly reduced.