

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADIA WATER, LLC,

Respondent.

DOCKET UW-240151

COMMISSION STAFF'S RESPONSE
TO WATER CONSUMER
ADVOCATES OF WASHINGTON'S
MOTION FOR OFFICIAL NOTICE

I. INTRODUCTION

1 The Water Consumer Advocates of Washington (WCAW) filed a motion requesting the Utilities and Transportation Commission (Commission) to take official notice of certain documents containing board membership and senior executive officer information for Cascadia Water, LLC (Cascadia or Company), and Cascadia's parent corporations. WCAW claims that certain statements in Cascadia's reply brief "call into question the structure of Cascadia's governing board and its relationship to the governing boards of Cascadia's parent corporations."¹ Commission Staff (Staff) files this response and asks the Commission to deny WCAW's motion.

II. RELIEF REQUESTED

2 The Commission should deny WCAW's motion for official notice because the evidentiary record has closed and there is no substantial basis to supplement the record.

¹ WCAW Motion for Official Notice, ¶ 2.

III. STATEMENT OF FACTS

3 The evidentiary record in this case closed on February 11, 2025, but for the filing of the public comment exhibit, which was filed on March 3, 2025.² Parties filed post-hearing briefs and reply briefs on February 28, 2025, and March 11, 2025, respectively. WCAW now asks the Commission to take official notice regarding Cascadia’s corporate structure, governance, and ownership. There is no issue in controversy regarding Cascadia’s corporate structure, governance, or ownership, and the time to submit evidence in this case has passed.

IV. STATEMENT OF ISSUES

4 Should the Commission deny WCAW’s motion for official notice when there is no new issue regarding Cascadia’s corporate structure, governance, or ownership, the evidentiary record has closed and briefing is completed, and WCAW offers no basis to reopen the record?

VI. ARGUMENT

5 The Commission has denied requests for official notice when the record is well-developed on an issue.³ In *Puget Sound Energy*, the Commission denied a request for official notice where the record regarding market conditions was well-established. The Commission noted that “there is a point at which due process requires that the record be closed so that the parties are not having to respond repeatedly to “new” evidence and so that the Commission can do its job.”⁴ That is the case here. There is a tremendous amount of evidence in the record, including evidence regarding Cascadia’s corporate structure and relationship with NW Natural corporate parent organizations. Cascadia’s corporate structure, governance, and ownership is established and unchallenged, making the documents for

² WAC 480-07-830(1).

³ *In re: Joint Application of Puget Holdings LLC and Puget Sound Energy, Inc., for an Order Authorizing Proposed Transaction*, Docket U-072375, Order 06 (Nov. 5, 2008).

⁴ *Id.*

which WCAW seeks official notice be taken unnecessary. WCAW presents no compelling reason to allow the record to be supplemented.

VII. CONCLUSION

6 WCAW's motion for official notice should be denied.

DATED this 25th day of March, 2025.

Respectfully submitted,

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