

ALLIANCE OF WESTERN ENERGY CONSUMERS

Washington Utilities And Transportation Commission

Docket No. UG-200568

Cascade Data Request 15:

Re: Plant Additions (Pro Forma)

Please refer to Exhibit BGM-7T at 9, lines 11-18, where Mr. Mullins states that the Arlington Gate project was already included in Cascade's 2019 GRC, but then notes that one of the funding projects was "excluded from revenue requirement[.]"

- a. Does Mr. Mullin agree that the Arlington Gate project was not included in Cascade's revenue requirement in the 2019 GRC?
- b. Is it Mr. Mullins' position that, where an asset is not included in rates, the Company cannot subsequently seek recovery of that asset?

AWEC Response:

- a. No. The Arlington Gate project was included in Cascade's revenue requirement in the 2019 GRC.
- b. Mr. Mullins position is that it is unfair to ratepayers for Cascade to be provided with extraordinary rate relief through the inclusion of the same pro-forma capital additions in two separate rate cases that are filed in short succession, one after another.

Response Date: 02/05/2021

Witness(es) Most Knowledgeable About Response:

Brad Mullins