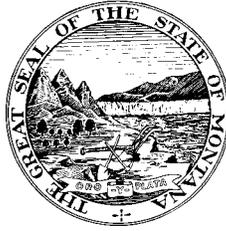


PUBLIC SERVICE COMMISSION STATE OF MONTANA

Greg Jergeson, Chair
Ken Toole, Vice-Chair
Gail Gutsche, Commissioner
Brad Molnar, Commissioner
John Vincent, Commissioner



1701 Prospect Avenue
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Voice: 406.444.6199
Fax #: 406.444.7618
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Memorandum

October 19, 2009

To: Barbara Campbell
Utility Solutions, LLC
P.O. 10098
Bozeman, MT 59715

Sandra Barrows
6171 Lazy Man Gulch
Helena, MT 59601

cc: Service List

From Leroy Beeby, Rate Analyst
Montana Public Service Commission

RE: Data Requests in Docket Nos. D2005.11.163 and D2005.11.164

Enclosed please find data requests of the Montana Public Service Commission (PSC) to Utility Solutions, LLC, numbered PSC-022 through PSC-043, in the above-referenced dockets. When responding, please begin each new numbered response on a separate page and identify the responding witness. Please provide an original and ten (10) copies of your responses, punched for three-ring binders. In the event of questions, please contact me at (406) 444-6188.

enc.

Service Date: October 19, 2009

DEPARTMENT OF PUBLIC SERVICE REGULATION
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

* * * * *

IN THE MATTER of the Application of)
Utility Solutions, LLC to Implement) UTILITY DIVISION
Initial Rates and Charges for Water Service)
in its Elk Grove Subdivision, Gallatin) DOCKET NO. D2005.11.163
County, Montana, Service Area)

IN THE MATTER of the Application of)
Utility Solutions, LLC to Implement) UTILITY DIVISION
Initial Rates and Charges for Wastewater)
Service in its Elk Grove Subdivision,) DOCKET NO. D2005.11.164
Gallatin County, Montana, Service Area)

**COMMISSION STAFF DATA REQUESTS PSC-022 THROUGH PSC-043
TO UTILITY SOLUTIONS, LLC**

PSC-022

Regarding: Mailing Inserts
Witness: Campbell

Please provide copies of all mailing inserts sent to the customers of Elk Grove by Utility Solutions since it began serving the customers of Elk Grove.

PSC-023

Regarding: Minutes
Witness: Campbell

Please provide copies of all Board Minutes of Utility Solutions LLC.

PSC-024

Regarding: Will Serve Agreements
Witness: Campbell

- a. Please provide copies of all "Will Serve" agreements that have been entered into by Utility Solutions.

- b. At maximum build out, what is the number of customers that Utility Solutions has committed to by the “Will Serve” agreements?
- c. Will it be necessary for Utility Solutions to increase the size of its plant and operations to enable it to serve the “Will Serve” obligations? Why or why not?

PSC-025

Regarding: Transference of Ownership
Witness: Campbell

- a. Please provide copies of all correspondence including any Commission Orders authorizing Utility Solutions to begin serving the customers of Elk Grove.
- b. Please provide copies of any and all contracts between the original developers of Elk Grove and Utility Solutions including sales price of the utility to Utility Solutions.
- c. If Utility Solutions acquired the utility from someone other than the original developer, please provide copies of any and all correspondence, including contracts between that entity and Utility Solutions.
- d. Are the contracts “arms length” contracts? If not, why not?

PSC-026

Regarding: Ownership of Utility Solutions
Witness: Campbell

Please provide an ownership trail of the utility serving the residents of Elk Grove from when service was first provided to the customers through today.

PSC-027

Regarding: Service Area
Witness: Campbell

- a. Is Utility Solutions providing water or sewer service to any locations other than Elk Grove?
- b. If so, is that location a part of this general rate filing? If not, why not?
- c. If the answer to (a) is yes, please provide copies of orders from the Commission authorizing the provision of the service.
- d. Is Utility Solutions providing wholesale water or sewer service to any locations other than the Elk Grove subdivision? If so, please specify the location and number of customers it is serving in each of those locations.

PSC-028

Regarding: Utility Solutions

Witness: Campbell

- a. Please provide the listing of all the owners of Utility Solutions, LLC.
- b. If Utility Solutions is owned by another company, please provide the ownership of that company as well.

PSC-029

Regarding: Capacity

Witness: Campbell

What is the maximum capacity of the system(s) that are serving Elk Grove subdivision in terms of customers? Please include as well any system that Elk Grove may be sharing with any wholesale customers.

PSC-030

Regarding: EDU

Witness: Barrows

Please provide the basis and computation of the EDU computation for waste water for all areas served by Utility Solutions.

PSC-031

Regarding: Work papers

Witness: Barrows

Please provide all of the workpapers submitted in this filing and the interim filing in EXCEL format with all formula intact.

PSC-032

Regarding: Rate Base

Witness: Barrows

- a. Please provide a spreadsheet listing the entire rate base included in the Elk Grove water utility rate base, the original cost, date placed in service, life of item, remaining life, accumulated depreciation and net remaining value. Please reconcile to MCC-013 and MCC-014.
- b. Is any of the above rate base used in the service of customers other than Elk Grove? If so, please provide the allocation and method of calculating the allocation
- c. Please provide the sales agreement showing the purchase of the sewer and water utilities by Utility Solutions referred to in your testimony on page 4.

d. Please provide the agreement that for ratemaking purposes, the capital investment would be \$1.5 million dollars as referred to in your testimony on page 4.

PSC-033

Regarding: Rate Base

Witness: Barrows

a. Please provide the allocation and basis for allocation between water and sewer of the \$1.5 million referred to in your testimony.

b. Please provide the allocation and basis for allocation determining that of the total costs of \$1,081,229.61 for water and \$1,025,710.09, that determined \$1.5 million was the proper amount for regulatory purposes.

c. Please provide all additions to and reductions from rate base since 2003, including cost, date put into service, life, accumulated depreciation, financing arrangements, and an explanation as to how it pertains to Elk Grove water users.

PSC-034

Regarding: Depreciation and Amortization (Pg 8 of your testimony)

Witness: Barrows

Please explain why Utility Solutions is requesting a return *of* assets that are not included in rate base.

PSC-035

Regarding: Standard Tariff Language

Witness: Barrows

a. Please provide the cost analysis for all Standard tariff language as referred to in your testimony pages 10-12.

PSC-036

Regarding: Operating Expenses – Purchased Power

Witness: Barrows

Please provide location and statements for each individual electric meter.

PSC-037

Regarding: Balance Sheet 38.5.121

Witness: Barrows

Please balance the balance sheet explaining all correcting adjustments.

PSC-038

Regarding: Contracted Services

Witness: Barrows

a. Please provide a spreadsheet detailing the Contracted Services amount of \$20,398.71, including the amount, what it was for and any relationship to the owner(s) of Utility Solutions.

b. Please do the same for the corresponding amount in the wastewater filing.

PSC-039

Regarding: Office Expense

Witness: Barrows

Please detail the office expense, and if it is a direct or allocated expense between the regulated and non-regulated utility and allocation between those and the waste water system.

PSC-040

Regarding: Accounting expense

Witness: Barrows

Please detail the accounting expense in the same method as asked of the office expense in previous data request.

PSC-041

Regarding: Insurance

Witness: Barrows

Please provide a copy of the statement supporting the insurance expense and any allocations of the expense.

PSC-042

Regarding: Contract

Witness: Campbell

Please provide a copy of the sales agreement between Concinnity and Utility Solutions for the water and wastewater systems.

PSC-043

Regarding: Partnership Returns

Witness: Barrows

Please provide copies of the partnership returns filed by Utility Solutions.