

PUBLIC SERVICE COMMISSION STATE OF MONTANA

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Bill Gallagher, Commissioner
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MEMORANDUM

August 5, 2011

To: Barbara Hall, Legal Director
Clark Fork Coalition
140 S 4th Street West, Unit 1
P.O. Box 7593
Missoula, MT 59801

From: Leroy Beeby, Rate Analyst
Montana Public Service Commission

RE: PSC data requests in Docket D2011.1.8

Enclosed please find data requests of the Montana Public Service Commission to Clark Fork Coalition, numbered PSC-039 through PSC-042, in the above-referenced docket. If you have any questions regarding these data requests, please contact me at 444-6188 or Kate Whitney at 444-3056.

Enclosure

cc: service list

Service Date: August 5, 2011

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

IN THE MATTER OF the Consolidated) REGULATORY DIVISION
Petition by Mountain Water Company for)
Declaratory Rulings and Application for) DOCKET NO. D2011.1.8
Approval of Sale and Transfer of Stock in)
Park Water Company)

**MONTANA PUBLIC SERVICE COMMISSION DATA REQUESTS
PSC-039 THROUGH PSC-042 TO CLARK FORK COALITION**

PSC-039

Regarding: Education and experience
Witness: Rial

- a. Please list your experience testifying before any regulatory commission in any state.
- b. Please list your post-secondary degrees, from which universities those degrees were acquired, and the graduation years.
- c. Are you testifying as an individual on behalf of the Clark Fork Coalition or as Charles Rial and Associates? It is unclear in your testimony.
- d. Please provide a copy of the consulting agreement from the Clark Fork Coalition with regard to the proposed Park Water sale.

PSC-040

Regarding: Carlyle Ownership Period (Page 2 of 4, line 15)
Witness: Rial

Please provide your basis for what you testify would be the reasonably expected ownership period of Park Water by Carlyle.

PSC-041

Regarding: Park Water Ownership
Witness: Rial

In your testimony you state that the concern of the Clark Fork Coalition is that Park Water would have a series of owners which may not have the quality reputation for stewardship of their companies rightfully earned by the Carlyle Group.

- a. Do you have those same concerns? Why or why not?
- b. Is the Clark Fork Coalition's concern more post-Carlyle ownership rather than Carlyle ownership? Please explain.
- c. Does that statement mean that the Clark Fork Coalition believes that Carlyle will be a responsible steward of Park/Mountain Water? Why or why not?

PSC-042

Regarding: Clark Fork Coalition
Witness: Rial

- a. Please provide a copy of the mission statement of the Clark Fork Coalition.
- b. Please reconcile your testimony to the mission statement of the Clark Fork Coalition.
- c. Please explain why the Clark Fork Coalition believes that the acquisition of Park Water, Mountain Water's parent, will impact the mission of the Coalition in light of the comment that Carlyle has a quality reputation for stewardship of companies it acquires.
- d. Please provide all examples where Mountain Water has not protected the watershed in its provision of service.
- e. Is the Coalition aware of the aquifer studies conducted by Park Water on behalf of Mountain Water?