

Service Date: April 21, 2015

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

IN THE MATTER OF the Joint Application)
of Liberty Utilities Co., Liberty WWH, Inc.,) REGULATORY DIVISION
Western Water Holdings, LLC, and Mountain)
Water Company for Approval of a Sale and) DOCKET NO. D2014.12.99
Transfer of Stock)

**Liberty Utilities Co. and Liberty WWH, Inc.’s Responses to
Data Requests PSC-028 through PSC-038.**

Liberty Utilities Co. (“Liberty Utilities”) and Liberty WWH, Inc. (“Liberty WWH” and collectively “Liberty”), by and through its undersigned counsel, hereby submits to the Montana Public Service Commission (“Commission”) these responses to the data requests from the Commission. Requests PSC 028 through 032 were directed to Mountain Water and Liberty does not possess any independent responsive information for those requests and does not repeat those requests in this response.

Submitted this 21st day of April, 2015.

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**ATTORNEYS FOR LIBERTY UTILITIES CO.
AND LIBERTY WWH, INC.**

PSC-033

Regarding: Western Water sale process
Witness: David Pasieka

- a. Explain your involvement, if any, in the sale process, including development of Liberty's non-binding and binding proposals and Liberty's due diligence efforts.

Response: Mr. Pasieka was part of a team of professionals (both internal and external) that reviewed the Carlyle/Western Water/Park teaser and Confidential Information Memorandum ("CIM"). He attended the management information session and was given access to the electronic data room. Liberty's due diligence team used these sources of information and others to create both non-binding and binding proposals as well as due diligence materials.

- b. Please provide the financial analysis that was done in conjunction with Algonquin's/Liberty's due diligence, including but not limited to projected financial results (e.g., income statements, balance sheets, cash flow).

Response: Liberty objects to this request because it seeks information which is not relevant to this matter and is protected from disclosure as confidential and containing proprietary trade secrets. Liberty's due diligence work papers and financial projections are not relevant because they have no impact on Mountain Water's consumers. The documents are not tied to the service consumers will receive, the operations of Mountain Water, or the rates consumers will pay. Moreover, Liberty's internal valuation will not affect Mountain Water's rates or the level of service, as stated in Liberty's application, because Liberty does not intend to seek an acquisition adjustment to the existing rate base. Regardless of these considerations, all future rate changes will be subject to the Commission's review and approval. Accordingly, this request seeks information that has no bearing on the Commission's decision in this matter, and as such seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible information.

The requested information is also protected from disclosure because it is proprietary and contains confidential trade secrets. Liberty's due diligence efforts, including any financial analyses of potential investments, are based upon years of research and investment at a substantial cost to Liberty Utilities. The underlying financial and other analyses and overall bid strategy and methodologies that Liberty implements in responding to solicitations relating to the sale of regulated utilities are proprietary and contain confidential trade secrets. Moreover, compelling winning bidders to disclose their successful strategy will necessarily have a chilling effect on the participation in the market of future offerings of utility assets. Disclosure of such information, even under seal, would be harmful to the business interests of Liberty, because both the seller and the City of Missoula are parties who potentially could obtain these materials, and the Commission cannot provide certainty that information produced, even under protective order, would not be subject to disclosure on challenge by a party or outside interested party.

- c. Please disclose and produce any written or verbal agreements between Carlyle/Western Water/Park and Algonquin/Liberty Utilities that have not already been provided to the Commission.

Objection: Liberty objects to this request to the extent it seeks information not relevant to the subject matter of the instant proceeding, information not reasonably calculated to lead to the discovery of evidence admissible in the instant proceeding, confidential and proprietary information and to the extent it seeks agreements that are protected by the attorney-client privilege or the attorney work-product doctrine.

Response: There are no other agreements governing the transaction that have not already been provided to the Commission.

PSC-034

Regarding: Planned capital investments
Witness: David Pasieka

- a. Did Liberty review Western Water's planned \$200 million of regulated capital investments through 2019E (referenced in the Project Orchard summary fact sheet)?

Response: Yes. Liberty reviewed the capital plan provided by the Seller in its CIM. This \$200 million capital plan from 2014 to 2019 included the projected capital spending for the three Park Water utilities in aggregate, not just Western Water. The Mountain Water portion of this total was \$34 million.

- b. If the answer to (a) is yes, please indicate whether Liberty will follow Western Water's planned regulated capital investment plan for Mountain Water.

Response: Liberty intends to support and follow the planned regulated capital investment plan for Mountain Water.

Future capital investment plans will be developed locally and Liberty is willing to support the capital investment needs as determined by local management, including additional capital investment if warranted and needed, as well as meeting the criteria for inclusion in rates by the Commission. Further, the capital budgeting process for each Liberty utility is developed by local management for that utility. With respect to Mountain Water, Liberty will support the existing capital investment plans developed by Mountain Water's local management team, as well as additional capital investment plans if warranted and necessary.

- c. Please identify the projects and associated capital investment amounts that Liberty plans to undertake in the Mountain Water service area through 2019E.

Response: Liberty understands Mountain Water is attaching a copy of its capital budget in response to PSC-030. As noted in the response to part a. above, the projected capital investment plan prepared by the Seller for Mountain Water was \$34 million for 2014 through 2019. As noted in the response to part b above, Liberty will follow Mountain Water's capital investment plans and Liberty will provide additional capital if warranted and needed. At this time, Liberty has not had an opportunity to determine whether additional projects will be needed. In keeping with Liberty's local management focus, Liberty expects the sequencing and implementation of the capital investment plan to be managed by Mountain Water.

PSC-035

Regarding: Shared services model
Witness: David Pasieka

- a. Identify specifically which administrative support services that Liberty will provide centrally from the Liberty Utilities (or LABS or Liberty Utilities Canada) level to Park Water and to Mountain Water.

Response: Liberty Utilities' corporate function model is addressed beginning at page 17 of the testimony of Mr. Pasieka. An overview of the Liberty Utilities' corporate functions model is provided in Exhibit DJP-2. There are three main corporate groups that provide services to the Algonquin organization, including Liberty Utilities and its affiliate utilities. These are APUC, Liberty Utilities Canada ("LUC"), and Liberty Algonquin Business Services ("LABS").

Please also refer to the Corporate Allocation Manual ("CAM"), provided as attachment DJP-3, which outlines the services provided from corporate entities.

Please note that Liberty's CAM is subject to review and approval in all ten states in which Liberty has utility operations, and those commissions have reviewed and approved the applicable cost allocation methodology in prior rate cases.

From an organizational perspective, employees providing the services from LUC and LABS all reside within Liberty Utilities Canada.

Liberty Utilities Canada:

LUC employees who are solely dedicated to providing the services or functions to utilities across the states are not considered to be shared services. These services include rates and regulatory affairs, customer service, and utility planning. These duties are specific to assisting the regulated business within LUC and are not allocated outside of LUC.

Customer service conducts the typical services expected of a department with that name, including the development and ongoing oversight of customer service policies, practices and procedures.

Likewise, the regulatory function at LUC develops and oversees the implementation of the regulatory strategy for LUC regulated entities.

Services provided by LUC are direct charged to the extent possible. Allocations of indirect charges from LUC are distributed to the regulated utilities using the "Four Factor" method shown at Table 2 of the CAM.

Likewise, any indirect charges that may be allocated to LUC from LABS or APUC will also be allocated to utilities using the “Four Factor” method shown at Table 2 of the CAM.

We expect the LUC corporate cost direct charges and allocations to be applied to Mountain Water and the two California water utilities using this same method. These services will be provided centrally from the LUC staff in Oakville, Ontario.

Liberty Algonquin Business Services

LABS is the internal name for the shared services functions provided at the corporate level to both Liberty Utilities (the regulated utility businesses) and Algonquin Power (“APCo”) (the power generation business). LABS provides the following shared services: risk management, information technology, human resources, training, facilities and building rent, procurement, environment health safety and security, legal and capital management services, internal audit and communications.

Risk management is responsible for the development, placement and administration of insurance coverages, property inspections and valuations for insurance.

Information technology is responsible for the selection and implementation of information systems and equipment for accounting, engineering, administration, customer service, emergency restoration and other functions.

Human resources is responsible for the development of human resource policies and procedures, including development, placement and administration of employee benefit programs, as well as group insurance and retirement annuities.

Training is responsible for ensuring that the appropriate educational needs of the organization and all employees are met, thus ensuring that all Liberty employees are properly trained to perform their duties. This includes providing courses, lectures, in house training and sessions by third party providers.

The facilities and building function obtains and maintains the office space needs for the corporate head office.

Procurement provides purchasing services, including preparation and analysis of product specifications, requests for proposals and similar solicitations, as well as vendor and vendor-product evaluations.

Environment health safety and security is responsible for all corporate practices and procedures related to the environment, including the health, safety and security of Liberty’s workplace, employees, and customers.

Legal performs legal services for corporate business, including development of corporate structure, and the associated affiliate agreements. Legal also is responsible for development of legal strategy and practices for all corporate entities.

Financial reporting and administration conducts typical services expected of a finance/accounting team, including accounting, budgeting, forecasting, and financial reporting services including preparation of reports and preservation of records, and cash management (including electronic fund transfers, cash receipts processing, managing short-term borrowings and investments with third parties).

Treasury is responsible for all corporate treasury functions.

Internal audit conducts internal reviews of practices and procedures to ensure compliance is met in all areas of the business, including Sarbanes-Oxley.

Communications provides both internal and external communication services. External communications includes the provision of information to meet investor relations obligations and the provision of all corporate news, and will include assisting all corporate entities with their local communication needs. Internal communications include employee newsletters and ongoing updates on internal issues and events.

Services provided by LABS are direct charged to the extent possible. Allocations of any indirect costs from LABS are distributed first between the Liberty and APCo business units using the multi-factor methods shown at Table 4 of the CAM. The allocations that remain within Liberty following this initial step are then charged to all utilities using the “Four Factor” method shown at Table 2 of the CAM.

We expect the LABS corporate cost direct charges and allocations to be applied to Mountain Water and the two California water utilities using this same method. These corporate services will be provided centrally from the LABS staff in Oakville, Ontario.

Algonquin Power & Utilities Corp.

APUC is the ultimate corporate parent and affiliate that provides overall financial, strategic management, corporate governance, administrative and support services to Liberty Utilities and APCo. The services provided by APUC are necessary for Liberty Utilities Canada and its subsidiaries to maintain robust access to capital markets for capital projects and operations.

Services provided by APUC are direct charged to the extent possible. Allocations of any indirect costs from APUC are distributed first between the Liberty Utilities and APCo business units using the multi-factor methods shown at Table 1 of the CAM. The allocations to Liberty following this initial step are then charged to all utilities using the “Four Factor” method shown at Table 2 of the CAM.

We expect the APUC corporate cost direct charges and allocations to be applied to Mountain Water and the two California water utilities using this same method. These corporate services will be provided centrally from the APUC staff in Oakville, Ontario.

- b. Where is the central location from which Liberty will conduct shared services for Mountain once the transition from Park is completed?

Response: These corporate services will be provided from Oakville, Ontario.

- c. On p. 12 of your testimony, you indicate the senior management team provides supporting services such as customer care and billing, among other services. If Liberty acquires Mountain, will customer care and billing for Missoula customers continue to be provided by Mountain employees in Missoula in the future, even after the transition to Liberty is complete?

Response: Customer care and billing will continue to be done locally in Missoula, with support from Canada. This is consistent with our operational model and operations of our regulated utilities in all other states.

- d. On p. 16 of your testimony, you indicate that the centralized services now being provided by Park to Mountain will transition to Liberty “and/or performed by additional resources” at Mountain. Please provide examples that demonstrate instances where Liberty has acquired water utilities and rather than transition centralized services to a central Liberty location has instead moved them to or kept them at the local utility level.

Response: This portion of the testimony refers to Liberty’s expectation to add staff at Mountain Water. Liberty is considering adding a rate or regulatory employee, a utility planner, and a municipal or local government relations coordinator. By way of example of Liberty’s commitment to enhancing local operations, Liberty has increased its staff in California for Liberty Utilities (CalPeco Electric) LLC from 78 employees in 2011 to 92 currently, with an expectation to add more staff as needed to enhance operations there. Liberty’s New Hampshire utilities had approximately 150 employees when Liberty purchased those companies, and now have approximately 300 employees in New Hampshire. Those employees were added in New Hampshire as a result of increasing the local utility staff to handle work previously done by the prior owner under transition service agreements. These examples demonstrate Liberty’s commitment to local management and operation and adding local staff to utility operations when warranted and cost effective. Liberty will continue to look for ways to enhance the effectiveness of local operations by adding local staff while still leveraging the economic efficiencies allowed by Liberty’s centralized services. Liberty’s commitment to local operations and management is further demonstrated by the fact that Liberty has over 900 employees in ten states.

- e. Please provide copies of all third-party-administered customer service surveys conducted for Liberty regarding its water utilities for the year 2014.

Response: The vision of Liberty Utilities is to provide satisfactory water, gas and electric utility services in the eyes of customers, employees, regulators and shareholders by providing safe, reliable and high quality services. To that end, Liberty Utilities hires an independent company (Luth Research) to conduct customer satisfaction surveys. Liberty Utilities then has a practice and policy of sharing those survey results with regulatory commissions. For example, attached as Attachment PSC-035 (LIB-A) is a copy of the 2013 survey results presentation provided to the Arizona Corporation Commission Staff on April 2, 2014. Please note that Liberty conducted one survey for Arkansas. Separately, the surveys for Texas and Missouri were done with the Arizona survey. Attached as Attachment PSC-035 (LIB-B) please find summaries of the 2014 survey results.

Response No. PSC-035
Attachment PSC-035 (LIB-A)

Customer and Community Care

April 2, 2014

Linda Byrd – Manager - Customer Care and Community

Emily Wunder – Community Water Resource Manager

Kathy Medlin – Customer Service Supervisor

Barbara Schacht – Customer Service Supervisor

Anna Jimenez – Customer Service Supervisor

Mariano Valenzuela – Customer Service Supervisor

Our Vision

To be the best water, gas and electric utility in the eyes of our customers, employees, regulators and shareholders by providing safe, reliable, high quality services.

Agenda

- Customer Satisfaction Survey
 - Results – Customer Service & Company
- Disconnect Process
- Landscape Audits
- Regulatory Complaints
- Liberty Utilities Community Events
- Lessons Learned and Moving Forward
- Questions & Discussion

Customer Satisfaction Survey 2014



Customer Satisfaction Survey

- Independent Company -Luth Research out of San Diego
- Fielding was completed from August 26 – September 11
- Fielding – 36% phone calls to randomly selected customers; 64% completed online
- 903 total completed surveys with minimum 200 completed surveys each region
- Comparison 2009, 2010, 2011, 2012, 2013
- Customer Focus Groups - 4 sessions (Sierra Vista, Rio Rico, Gold Canyon, Litchfield Park)

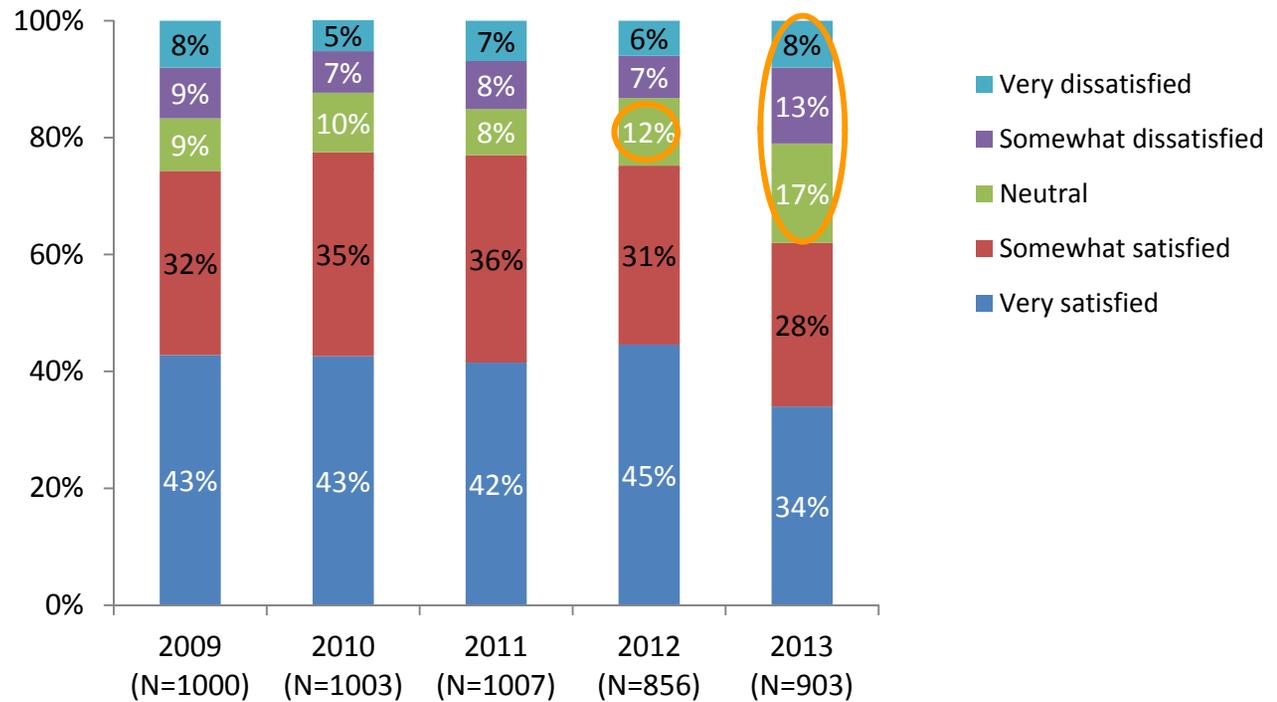
Survey Results

Company Satisfaction

75 % Customers were Neutral, Somewhat Satisfied, or Very Satisfied with the Company.

Company Evaluation – Overall Satisfaction

2009----- 84%
2010----- 88%
2011----- 86%
2012----- 88%
2013----- 75%



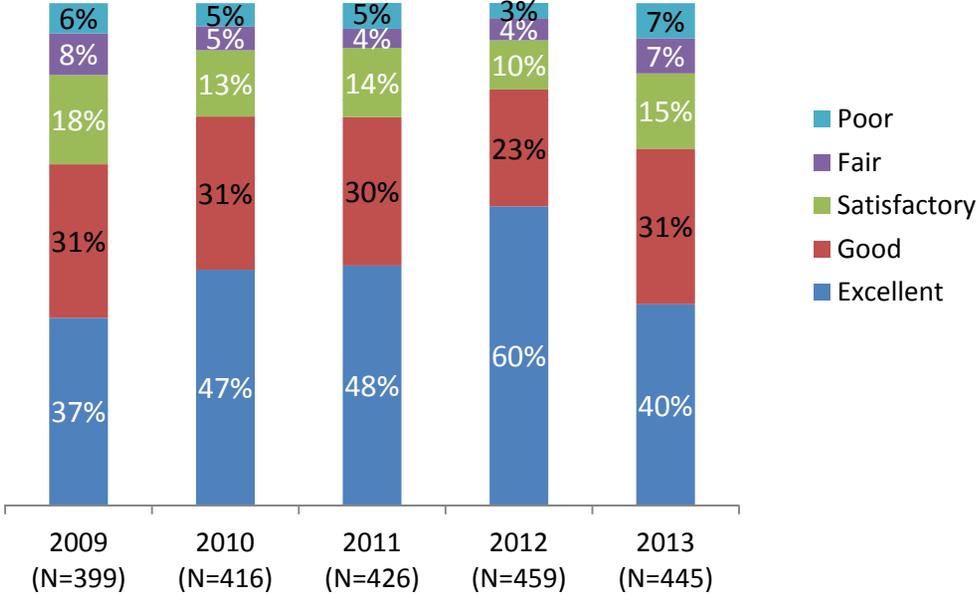
Survey Results

Customer Service

86% Customers believe Liberty Utilities provides Satisfactory, Good, or Excellent Service

2009----- 86%
 2010----- 91%
 2011----- 92%
 2012----- 93%
 2013----- 86%

Customer Service – Overall Experience



Surepay and E-Bill

Customers participating in Surepay 2013

2013 Target	30%
2013 Results	33.7%
As of Feb. 28 th	34.2%

Customers participating in E-Bill 2013

2013 Target	13%
2013 Results	17.5%
As of Feb. 28 th	18%

Customers participating in Surepay as of February 2014

Phoenix Area (LP, GC, EDO, BM)	40.1%
Sierra Vista	28.9%
Rio Rico	19.3%

Customers participating in E-Bill as of February 2014

Phoenix Area (LP, GC, BM)	19.6%
Sierra Vista	18.1%
Rio Rico	11.8%

Disconnect Process



Disconnect Process - LPSCO

Process:

1. Notice Mailed
2. Phone Call
3. Door Tag
4. Phone Calls
5. Disconnect

	2011	2012	2013
Disconnect Notice	15287	14745	13079
Phone Calls	6738	8043	9436
Door Hangers	1798	1641	2325
Turn Off	373	288	377

2.43% 1.95% 2.88%

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2009	161	227	296	284	79	223	243	166	184	173	130	118	2284
2010	106	133	189	52	26	31	20	35	27	39	26	18	702
2011	21	32	38	25	21	38	30	47	26	28	33	34	373
2012	38	39	32	16	31	16	17	29	26	25	19	n/a	288
2013	34	35	16	16	26	23	43	29	30	41	30	54	377

Disconnect Process – Rio Rico

Process:

1. Notice Mailed
2. Phone Call
3. Door Tag
4. Phone Calls
5. Disconnect

	2011	2012	2013
Disconnect Notice	12043	11058	11727
Phone Calls	N/A	6320	6888
Door Hangers	N/A	2153	1401
Turn Off	2417	673	627
	20%	6%	5%

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2009	305	224	135	123	208	228	139	280	91	217	271	265	2486
2010	83	211	266	75	97	185	130	210	149	176	198	255	2035
2011	157	576	199	192	349	218	213	281	27	76	43	86	2417
2012	57	42	31	64	72	70	69	78	82	68	40	n/a	673
2013	43	45	38	71	49	66	39	48	55	45	55	73	627

Disconnect Process – Sierra Vista

Process:

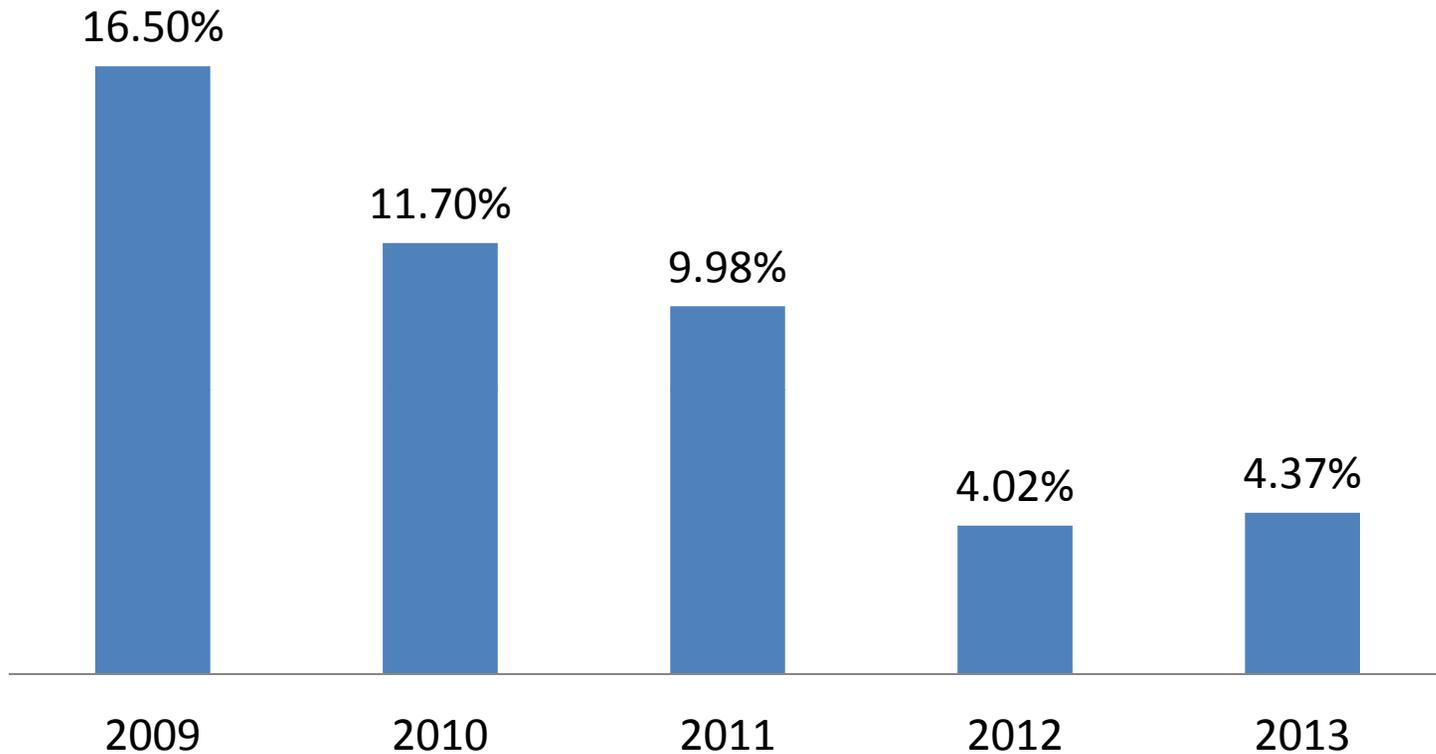
1. Notice Mailed
2. Phone Call
3. Door Tag
4. Phone Calls
5. Disconnect

	2011	2012	2013
Disconnect Notice	8669	6287	6876
Phone Calls	6532	2875	3342
Door Hangers	3732	1114	1162
Turn Off	826	338	336

9.53% 5.38% 4.89%

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2009	76	59	35	88	86	37	0	46	104	13	39	55	638
2010	41	51	80	49	8	27	42	38	60	50	55	21	522
2011	131	50	63	52	96	42	57	92	78	52	59	54	826
2012	41	33	40	34	25	31	19	28	24	30	33	n/a	338
2013	40	24	30	33	12	22	25	27	32	34	30	27	336

Percentage of Notices that Result in Disconnects



Percentage of actual disconnects vs the 10-day notices that were mailed.
Includes all Arizona Liberty Utilities Companies

Landscape Audits



Landscape Audits

LPSCO

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2010							2	18	10	14	10	5	59
2011	12	20	20	19	16	28	42	40	62	43	36	25	363
2012	33	33	24	32	30	26	36	35	23	29	22	16	340
2013	10	24	12	11	14	11	29	24	18	13	8	12	162

Rio Rico

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
2010													0
2011	0	0	0	0	1	0	0	0	0	0	0	0	1
2012	0	0	0	0	1	2	3	5	1	3	5	5	24
2013	0	0	4	3	6	9	9	4	5	6	4	3	53

Sierra Vista

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
2010							0	0	0	0	0	0	0
2011	0	0	0	0	0	0	0	0	0	0	0	0	0
2012	0	0	0	0	0	0	1	1	1	0	0	0	3
2013	0	0	0	0	0	1	2	1	0	0	0	0	4



Implemented LPSCO landscape audit program in summer of 2010 to assist residential customers in water conservation awareness. Implemented Rio Rico and Sierra Vista in 2012.

Regulatory Complaints



Regulatory Complaints

- 8 Utilities
- Approximately 41,000 Customers

Regulatory Complaints for Arizona Only									
	Rate	Billing	Odor	Water Quality	Water Service	Leak	Outage	Other	Total
Bella Vista		1						1	2
Black Mtn		1						1	2
Entrada del Oro									
Gold Canyon								1	1
LPSCO	1						2		3
Northern Sunrise									
Rio Rico		3						1	4
Southern Sunrise									
Total	1	5	0	0	0	0	2	4	12

Community and Conservation Events

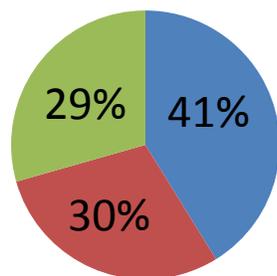


Overview 2013

Total Events	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOT
LPSCO	1		3	1	1	2	2			2		2	14
Rio Rico			1	1					1	1	1		5
Sierra Vista			1	1	2	1			1	2			8
Gold Canyon	1	1								1	1		4
Black Mtn.										1		1	2

Type of Event

■ Education
 ■ Outreach
 ■ Charitable



Education – Presentations, workshops, tours, etc.

Outreach – Booth and community events

Charitable – Clean-ups, help to causes, etc. This does not include company food or clothing drives or any monetary donations which are not attended by employees.

2013 Events

January:

- Peralta Trail Clean Up (Gold Canyon)
- Town Hall Presentation (Litchfield Park)

February:

- Lost Dutchman's Marathon Water Aid Stations (Gold Canyon)

March:

- Litchfield Park Kiwanis 5k Water Aid Stations benefiting the Kiwanis Club
- Rio Rico Lucky Clover 5k/10k Water Aid Stations benefiting Rio Rico High School
- Litchfield Park El. School District's Nutrition and Health Fair
- Lowe's Spring Event (Goodyear)
- Mini Workshop Irrigation Systems (Sierra Vista)

April

- Through the Pipes Irrigation Workshop (Litchfield Park)
- Through the Pipes Irrigation Workshop (Rio Rico)
- Water Expo (Sierra Vista)
- Environthon Judge



May:

- WWII Memorial Clean Up (Litchfield Park)
- San Pedro River Spring Festival (Sierra Vista)
- Mini Workshop Irrigation Systems (Sierra Vista)

June:

- Summer Feeding Program Free Lunch at Robey Elementary School (Avondale) - – clean the cafeteria and serve lunch to underprivileged families during the summer months
- Palm Valley Open House and Tour (Goodyear)
- Mini Workshop Drip Irrigation (Sierra Vista)

July:

- Independence Day Splash Bash (Litchfield Park)
- Summer Feeding Program Free Lunch at Robey Elementary School (Avondale)

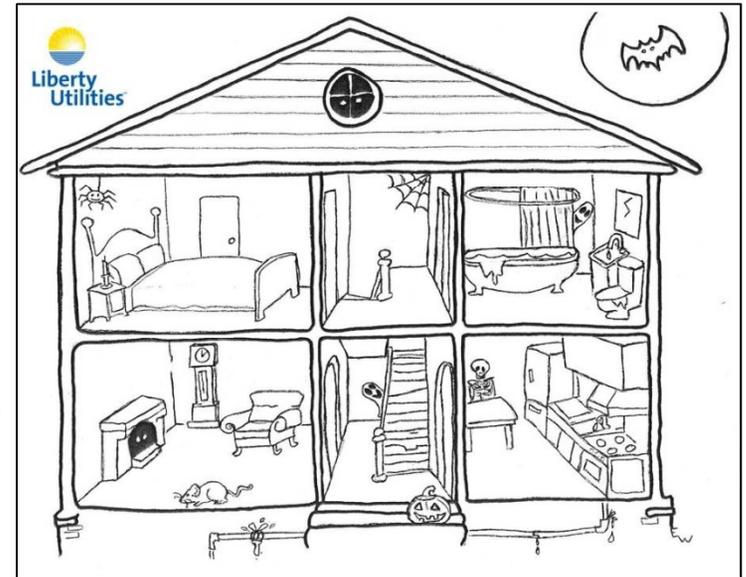
September:

- Home and Business Expo (Sierra Vista)
- FOG & Septic Workshop (Rio Rico)



October:

- Fire and Safety Day (Rio Rico)
- FOG Workshop and Plant Tour (Gold Canyon)
- Parktoberfest 5k Water Aid Stations benefitting Parkinson's (Black Mountain Carefree)
- FOG Workshop and Plant Tour (Goodyear)
- Mini Workshop Winterizing your Irrigation System (Sierra Vista)
- Tres Rios River Clean Up (Goodyear)
- Green Halloween (Sierra Vista)



November:

- Winterizing Your Landscape Workshop (Rio Rico)
- Day of the Cowboy Fall (Gold Canyon)

December:

- Christmas in the Park Snow Sponsor and Booth (Litchfield Park) – Dec. 8
- Christmas in Carefree Sponsor (Black Mountain Carefree) – Dec. 8
- Salvation Army Bell Ringers (Litchfield Park)



2013 Action Items

- ✓ Increase e-mail communication with customers-
Update customers on status of outages and other notifications
- ✓ Implement Landscape Audit program at Southern Arizona utilities
- ✓ Continue Public Outreach efforts (projects, rate cases, conservation)
- ✓ Increase Public Outreach program – educate on wastewater process/costs
- ✓ Hold Customer Focus Groups – SV, RR, GC, LPSCO
- ✓ Implement Follow-up program – customer satisfaction on home visits and after hours service calls.
- ✓ Monitor Phone Stats – new phone system with capability of producing reports average wait time, dropped calls, length of calls, etc
- ✓ IVR Phase 1 (LPSCO) – Interactive Voice Response – Inbound and Outbound calls.
- Instant Feedback on website - Add short pop-up surveys on website – areas of improvement



Liberty Utilities[™]

2014 Action Items

- Increase e-mail communication with customers-
Update customers on status of outages and other notifications
- Increase efforts to obtain current customer contact information
- Continue Landscape Audit program: Rio Rico, Sierra Vista, LPSCO
- Continue Public Outreach efforts (projects, rate cases, conservation)
- Increase Public Outreach program – educate on wastewater process/costs
- Focus Groups in community – CSAT and feedback
- ✓ Merge Phone groups - Avondale Office
- Instant Feedback on website - Add short pop-up surveys on website – areas of improvement



Questions/Discussion

Response No. PSC-035
Attachment PSC-035 (LIB-B)

Contents

Contents

1. Objectives & Methodology

2. Key Findings & Recommendations

Objectives & Methodology

Objectives

- Analyze current customer satisfaction levels with Liberty Utilities among Arkansas Customers.
- Compare current customer satisfaction levels with 2013 to determine whether satisfaction significantly increased or not over the past 12 months.

Methodology

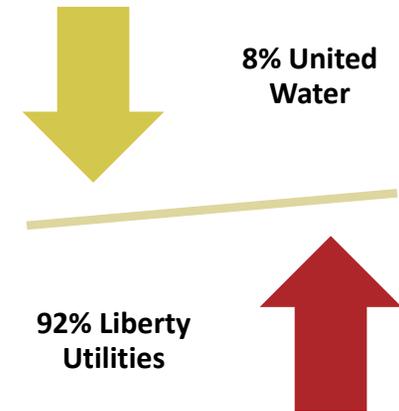
- A total of 485 surveys from Liberty Utilities customers were completed.
- 89% of interviews were completed via phone; 11% of interviews were completed online.
- The study was fielded from August 16th 2014 to August 26th 2014.
- The survey was significantly revamped in 2014; new/updated questions include Q2, Q2b, Q5, Q5b, Q6z, Q6x, Q6, Q6w, Q6y, Q7, Q8, Q10b, Q11, QEAST05, and D3.
- Statistical significance was tested at the 95% level.

KEY FINDINGS & RECOMMENDATIONS

Awareness & Satisfaction

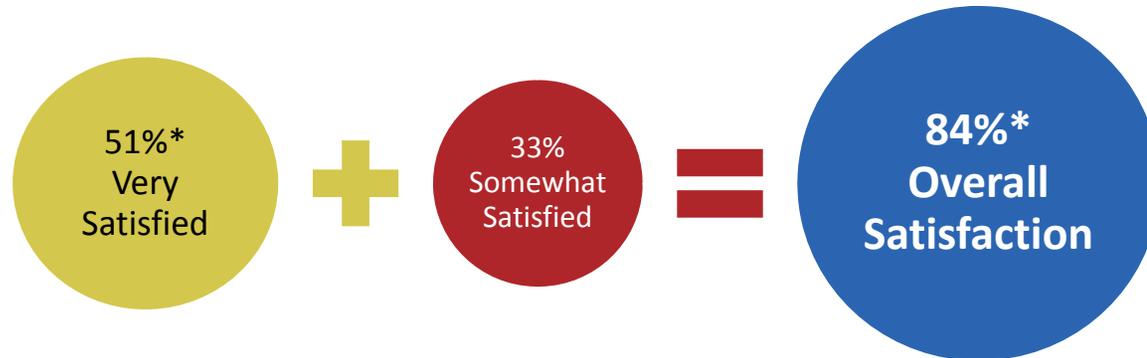
In 2014, recall of Liberty Utilities as the name of the local water company was 92%, a significant increase over 2013 (88%).

- The increase was driven by customers ages 45-64 (+7%).
- Recall was 100% among customers with incomes of 100K+, and lowest for Hispanics (86%).



Overall satisfaction with Liberty Utilities in 2014 was 84%, a significant increase from the past year (+7%). This gain was driven by the significant increase in customers who rated themselves as very satisfied, which increased from 43% in 2013 to 51% in 2014.

- This change in satisfaction was driven by customers ages 45-64, whose scores went up by 14%.



Overall Company and Services

Underpinning the overall company performance were significantly higher satisfaction scores for all but one of the company evaluation metrics. Note that the one metric that did not see a significant increase, provides a reliable water supply, was the highest to begin with.

- A number of metrics related to communications saw the largest increase in scores year over year, suggesting that efforts in this area have paid off:
 - Communications +18%
 - Community presence +15%
- Satisfaction with the company website improved significantly among customers ages 45-64 and 65+, but showed no improvement with customers ages 18-44.

Company Evaluation Metrics

- 88% Provides a reliable water supply
- 84%* Provides a safe water supply
- 78%* Customer service
- 77%* Accuracy of bill/statement
- 77%* Payment options
- 77%* Communications
- 70%* Encourages water conservation
- 67%* Community presence
- 60%* Price
- 40%* Company website

Company Evaluation Key Indicators

- 77% Quality of services
- 77% Protecting safety
- 76% Environmentally responsible
- 74% Responsible corporate citizen
- 72% Well-run company
- 72% Commitment to community
- 72% Vision for future
- 70% Being open about how it operates
- 66% Good value

Recommendations

Awareness

- Awareness has increased into the 90th percentile and doesn't have much more room to grow, but existing efforts in place to address this should be continued for at least one more year.

Overall Company and Services

- Overall satisfaction grew significantly and is now above the benchmark 80% value, which will be an important achievement to maintain and build upon in 2015.
 - Over half of Arkansas customers surveyed were very satisfied with Liberty Utilities, but customers ages 18-44 did not contribute significantly to these gains. Focusing efforts on this demographic should be a priority for the next year.
 - Satisfaction with the website improved significantly, but the majority of customers are not using it or are not awarding it high satisfaction marks. Changes made in 2014 appear to have addressed the needs of customers ages 45-64 and 65+, but not 18-44 who remain the least satisfied.
 - As noted last year, pricing and value remain along the lowest rated attributes, but it does appear that positive movement is starting to happen with scores significantly higher in 2014. Efforts in these areas should continue into 2015 to help further drive up scores.

Customer Service

- There was a significant increase in the average number of times customers visited an office or called customer service, both of which remained over twice as popular as visiting the website. There was, however, no change in satisfaction with the overall customer service experience.
 - Satisfaction with calling customer service and visiting an office were significantly higher than with the website experience, another important reason for focusing efforts on improving and delivering a better online experience for customers.

Recommendations

Customer Billing

- Strong and significant improvements in various customer billing metrics pointed to customers feeling increasingly satisfied with the ease of reading and understanding their bills. There remains an opportunity to increase the clarity and prominence of rate information, so that customers understand how their bills are calculated. If improved, this should help support a higher overall satisfaction score.

Service Outages

- Actions that were taken to improve communications in other areas of the company need to be reflected here, in an area that is very tangible and which directly impacts customers lives.

Communication & Website

- In 2014, customers were more actively engaged with the information inserts placed in their bills, with significantly more reading these always. Coupled with the significant increase in customers who chose regular mail/letter as their preferred method of receiving information, this communication channel is the perfect way for Liberty Utilities to continue connecting with and messaging their customers with the content needed to further inform and increase satisfaction levels.
- Significantly more customers visited the website in 2014 than 2013. The majority did so to pay a bill, and the perceived usefulness of the site remained high but unchanged year over year. Expanding the content and motivating more customers to visit should be an important objective for 2015 as this will help to underpin the customer satisfaction gains experienced in other parts of the operation.



Liberty Utilities – Arizona & Central US Customer Satisfaction – Final Report

November 2014



Contents

1. Objectives & Methodology

2. Key Findings & Recommendations

3. Key Findings – By Region

Objectives & Methodology

	Arizona & Central US
Objectives	<ul style="list-style-type: none"> Analyze current customer satisfaction levels with Liberty Utilities among Arizona and Central US customers Compare current customer satisfaction levels with inception year (2009) and previous year (2013) to determine whether satisfaction significantly increased or not
Number of Completed Interviews	864 (206-224 per region)
Phone vs. Online Completion Ratio	31% / 69%
Fieldwork Dates	10/21/14 – 11/04/14

- Interviews were conducted in the 4 areas Liberty Utilities services:
 - Central Arizona: Litchfield Park Serv. Co.
 - Southern Arizona: Bella Vista, Rio Rico, Northern Sunrise, Southern Sunrise
 - Eastern Arizona: Entrada Del Oro, Gold Canyon, Black Mountain
 - Central US: Big Eddy, Holiday Hills, KMB, Ozark Mountain, Tall Timbers, Woodmark, Holly Ranch, Noel
- The survey was significantly revamped in 2014; new/updated questions include Q2, Q2b, Q5, Q5b, Q6z, Q6x, Q6, Q6w, Q6y, Q7, Q8, Q10b, Q11, QEAST05, and D3.
- Statistical significance was tested at the 95% level.

KEY FINDINGS & RECOMMENDATIONS

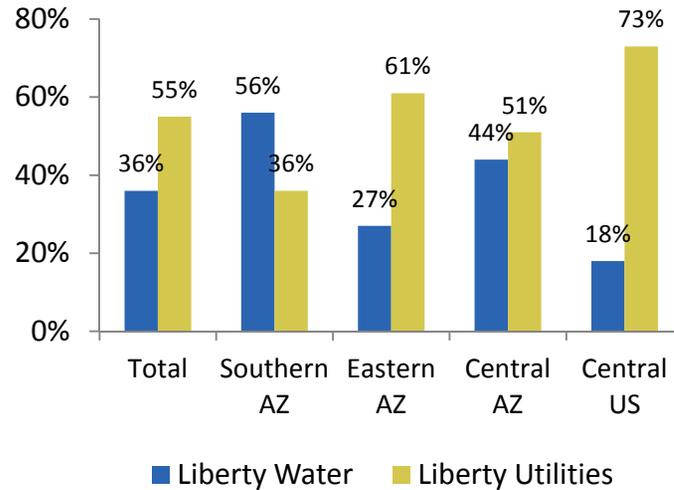
Awareness

More than half of customers (55%) were able to recall that their water utility provider was called Liberty Utilities.

- This was largely driven by Central US (73%) and Eastern AZ (61%).
- Among those who first chose Liberty Water, only a third (39%) stated that they were aware of the name change to Liberty Utilities.

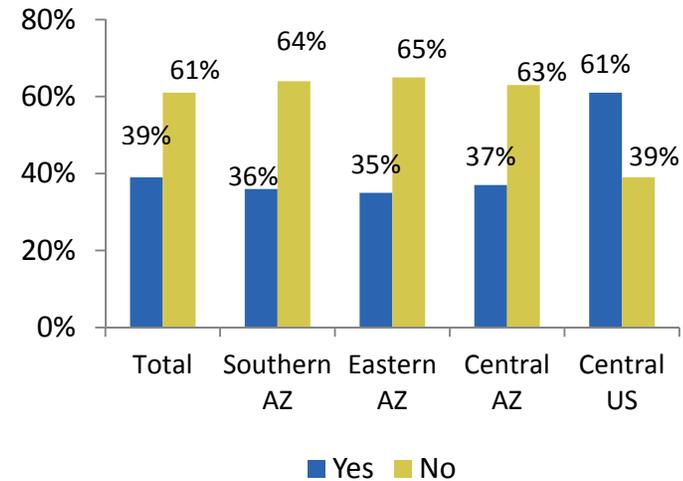
Local Water/Waste Water Company

N = 863



Aware of Name Change

N = 313



NOTE: Orange circled data indicates significant differences at the 95% confidence level.

QS3. Who is your local _____ company?

QS4. Are you aware that _____ has changed its name to Liberty Utilities?

Overall Satisfaction

Overall satisfaction with Liberty Utilities significantly improved in 2014 to 72%, up 10% from the prior year and in line with levels recorded in 2009 (75%).

- The increase was driven by customers reporting that they were very satisfied with Liberty Utilities (from 34% in 2013 to 42% in 2014).
- In terms of individual factors, customers were most satisfied with Liberty providing reliable (81%) and safe (75%) water services, and the accuracy of their bill/statement (75%). They were least satisfied with price (46%) and community presence (49%).

Southern AZ customers were most satisfied overall, while Eastern AZ respondents reported a significantly lower level of satisfaction.

- 84% of Southern AZ customers reported being somewhat or very satisfied with Liberty Utilities overall compared to 55% of Eastern AZ. Central AZ and Central US fell in the middle, each with 73%.



* Significantly higher than 2013 score

Overall Company and Services

Satisfaction with Liberty Utilities on the ten company evaluation metrics remained on par with 2013 (although still significantly lower than levels seen in 2009 for providing reliable and safe water services, and encouraging water conservation).

Regarding the key indicators, customers were primarily satisfied with Liberty Utilities as a company for its quality of services and being environmentally responsible. Customers were least satisfied with Liberty providing good value for the price.

Company Evaluation Metrics

- 81% Provides a reliable water supply
- 75% Provides a safe water supply
- 75% Accuracy of bill/statement
- 71% Payment options
- 62% Customer service
- 59% Encourages water conservation
- 52% Company website
- 51% Communications
- 49% Community presence
- 46% Price

Company Evaluation Key Indicators

- 66% Quality of services
- 62% Environmentally responsible
- 58% Well-run company
- 57% Protecting safety
- 55% Commitment to community
- 54% Responsible corporate citizen
- 52% Being open about how it operates
- 50% Vision for future
- 49% Good value

Recommendations

Awareness

- While awareness of Liberty Utilities as the local water company has shown a 19% increase over 2013, this has only reached 55% overall. Efforts to address this should be continued until name recognition falls in line with other Liberty regions (high 90th percentile).

Overall Company and Services

- While overall satisfaction significantly improved over the past year to 72%, it still falls below the benchmark 80% value. This will be an important metric to focus on building for 2015.
 - Satisfaction varies widely by region; satisfaction is above 80% in Southern AZ (84%), but below 80% in Central AZ (73%), Central US (73%), and Eastern AZ (55%). Focusing efforts on the areas where satisfaction is below 80% should be a priority for the next year.
 - While satisfaction with Liberty Utilities on the ten company evaluation metrics remained on par with 2013, less than half of customers were satisfied with Liberty's community presence (49%) and price (46%). While price may not be something that Liberty can change directly, efforts to demonstrate where the money is going and how the rates are calculated may help to improve perceptions in this area.

Customer Service

- There was a significant increase in satisfaction with customer service in 2014, which corresponded with significant increases in perceptions of the staff being easy to understand, and convenient business hours.
 - Satisfaction among those who called (72%) and visited an office (78%) was significantly higher than those who visited the website (64%) or used IVR (42%), pointing to customers' relative dissatisfaction with Liberty's technology touch points and their need for improvement.

Recommendations

Customer Billing

- There remains an opportunity to increase the clarity and prominence of rate information, so that customers understand how their bills are calculated. If improved, this should help support a higher overall satisfaction score.

Service Outages

- Customers were least satisfied with being informed of unplanned service outages/interruptions. Developing an effective way to communicate outages and interruptions, both planned and unplanned, will make communication from Liberty more consistent.

Communication & Website

- In 2014, over half of customers wanted to be communicated with via email (52%). This was more true for customers in Southern AZ (68%) and Central AZ (61%) than Eastern AZ (45%) and Central US (31%). Communicating with customers across channels, with a focus on email and traditional mail, should help Liberty reach the highest proportion of customers with messaging.
- Website usage was uneven among the four regions, with Southern AZ (77%) and Central AZ (69%) far more likely to use the website than Eastern AZ (28%) and Central US (25%). Identifying reasons for low usage in Eastern AZ and Central US should be a focus for 2015, with the goal to increase usage levels closer to those seen in Southern and Central AZ.
- The majority of customers visited the website to pay a bill, and the perceived usefulness of the site remained high but unchanged year over year. Expanding the content and motivating more customers to visit should be an important objective for 2015, in order to improve company perceptions and the dissemination of important information.

SOUTHERN ARIZONA

**BELLA VISTA, NORTHERN SUNRISE, SOUTHERN
SUNRISE, RIO RICO**

(Servicing Sierra Vista, Rio Rico, Whetstone, Hereford, Huachuca City)

Southern AZ

OVERALL SERVICES AND COMPANY

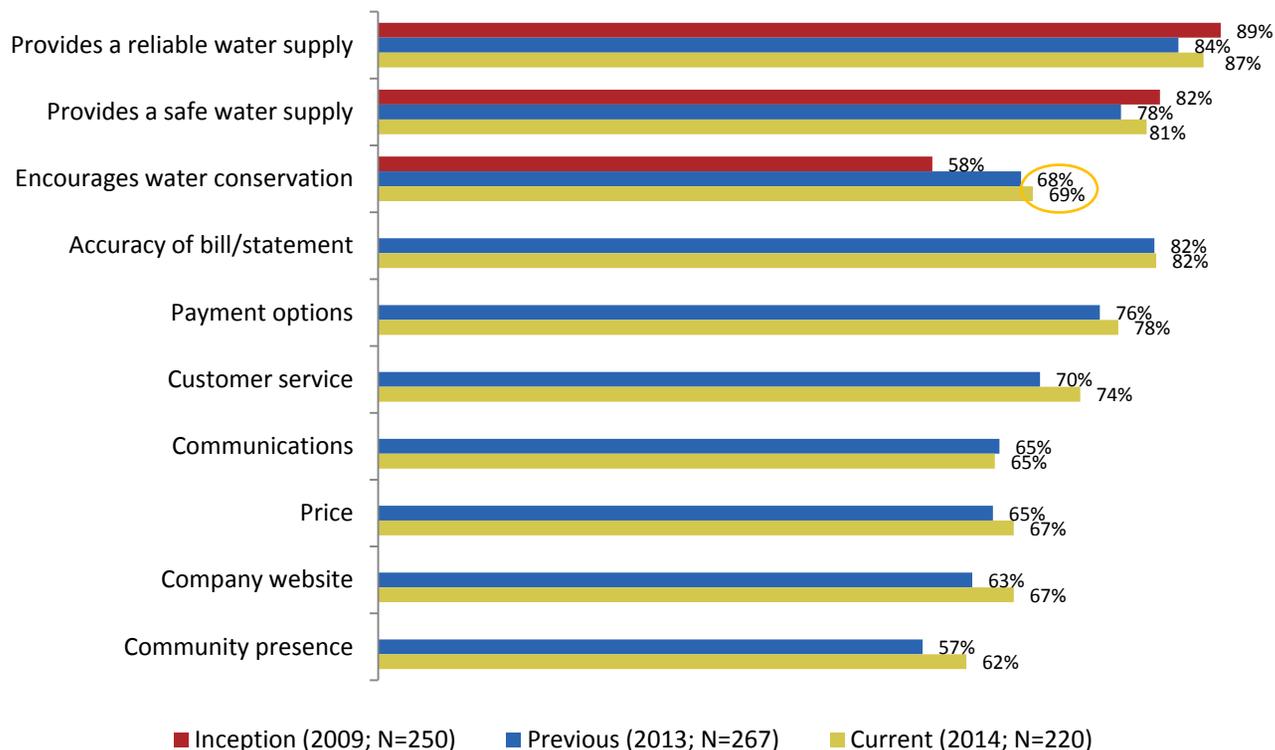
Company Evaluation – Satisfaction

Overall, satisfaction scores were stable for all metrics between 2013 and 2014.

Customers were most satisfied with Liberty’s provision of a reliable and safe water supply. They were also content with the accuracy of their bill/statement.

Top 2 Box Scores (4,5): 5 = Very Satisfied

Base = Total Respondents



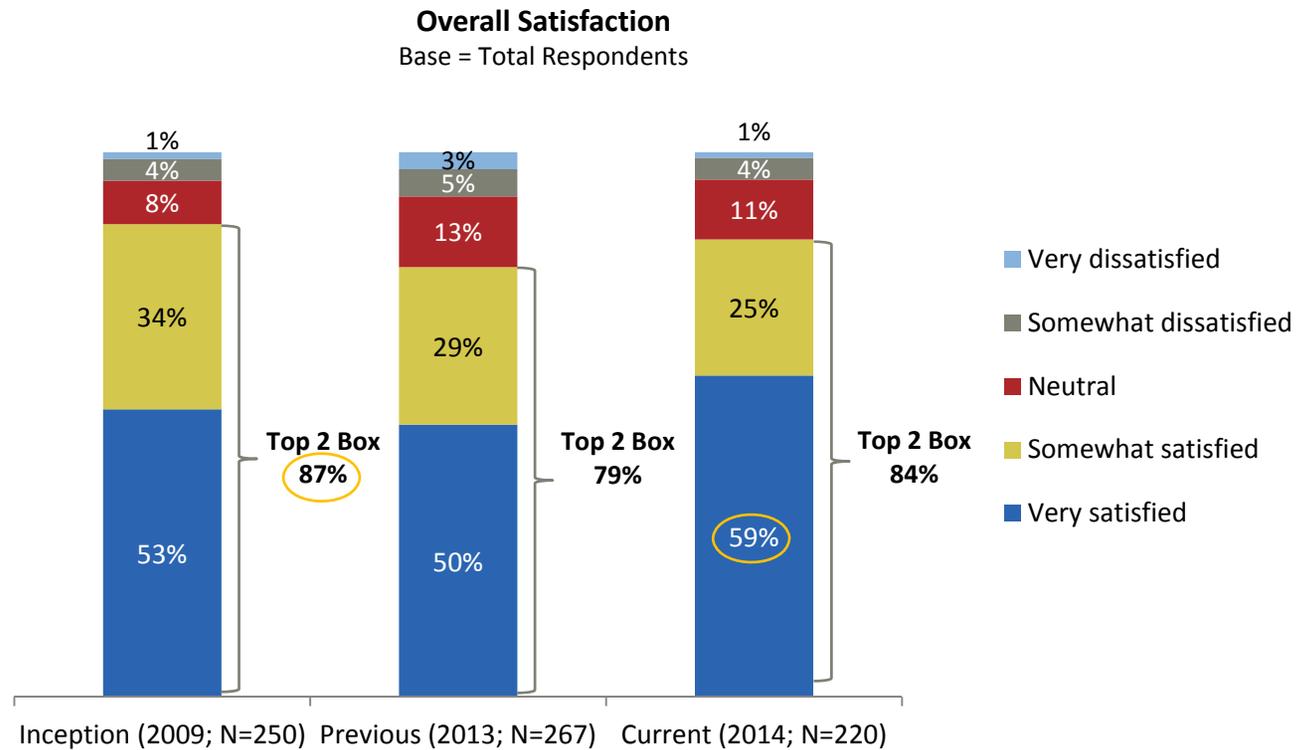
NOTE: Orange circled data indicates significant differences between the years.

NOTE: N/A option offered for all statements in 2013; N/A option offered for 4 of 10 statements in 2014. Less than n=20 respondents selected N/A for 5 of 6 statements in 2013 where N/A was not offered in 2014, so all 2013 scores were shown with N/A excluded from the base. Where applicable, all 2014 scores were also shown with N/A excluded from the base.

Q2. Please rate Liberty Utilities in the following areas by using a 5-point scale with 5 being “Very Satisfied” and 1 being “Very Dissatisfied”.

Overall Satisfaction

Overall satisfaction surpassed the 80% target threshold in 2014, driven by the significant increase in customers reporting that they were very satisfied with Liberty.



NOTE: Orange circled data indicates significant differences between the years.
Q3. Overall, how satisfied are you with Liberty Utilities?

EASTERN ARIZONA

ENTRADA DEL ORO, BLACK MOUNTAIN, GOLD CANYON

(SERVICING GOLD CANYON, SCOTTSDALE, CAREFREE, CAVE CREEK)

Eastern AZ

OVERALL SERVICES AND COMPANY

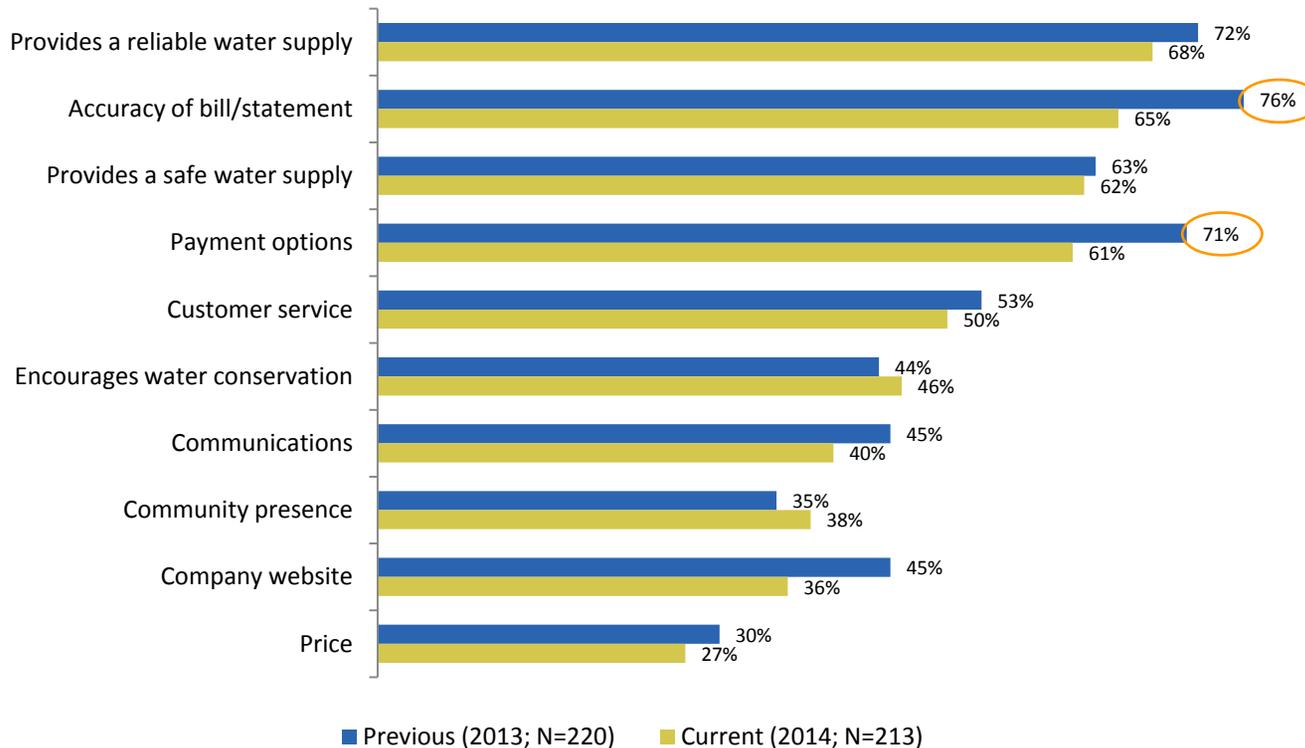
Company Evaluation – Satisfaction

Customers in Eastern AZ were significantly less likely to be satisfied with the accuracy of their bill/statement and payment options in 2014 compared to the year prior.

Six out of the ten statements received very/somewhat satisfied ratings from half of customers or less, with price the lowest rated.

Top 2 Box Scores (4,5): 5 = Very Satisfied

Base = Total Respondents



NOTE: Question not asked in 2009 in Eastern AZ.

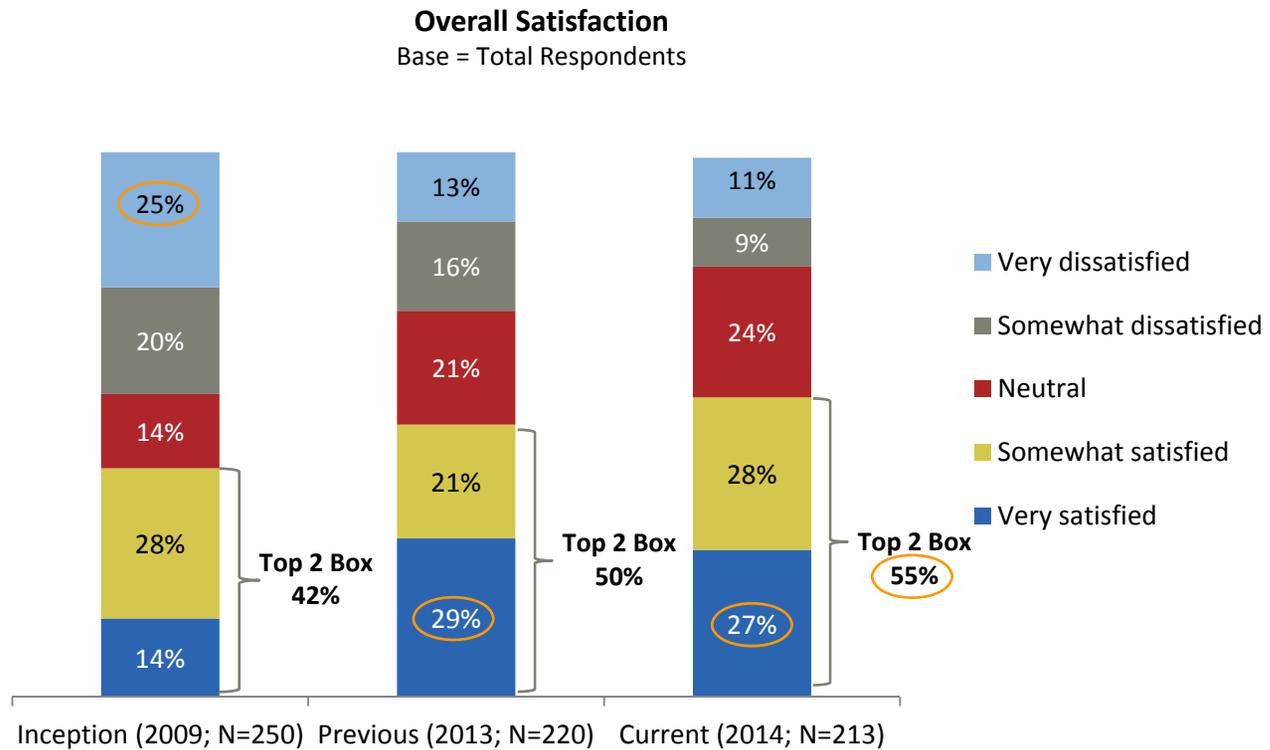
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Q2. Please rate Liberty Utilities in the following areas by using a 5-point scale with 5 being "Very Satisfied" and 1 being "Very Dissatisfied".

Overall Satisfaction

Overall satisfaction with Liberty Utilities among Eastern AZ customers was on par with 2013, with customers in both years significantly more satisfied than in 2009. This was driven by more very satisfied customers and fewer very dissatisfied customers.



NOTE: Orange circled data indicates significant differences between the years.
 Q3. Overall, how satisfied are you with Liberty Utilities?

CENTRAL ARIZONA

LITCHFIELD PARK SERV. CO.

(SERVICING AVONDALE, GOODYEAR, GLENDALE, LITCHFIELD PARK)

Central AZ

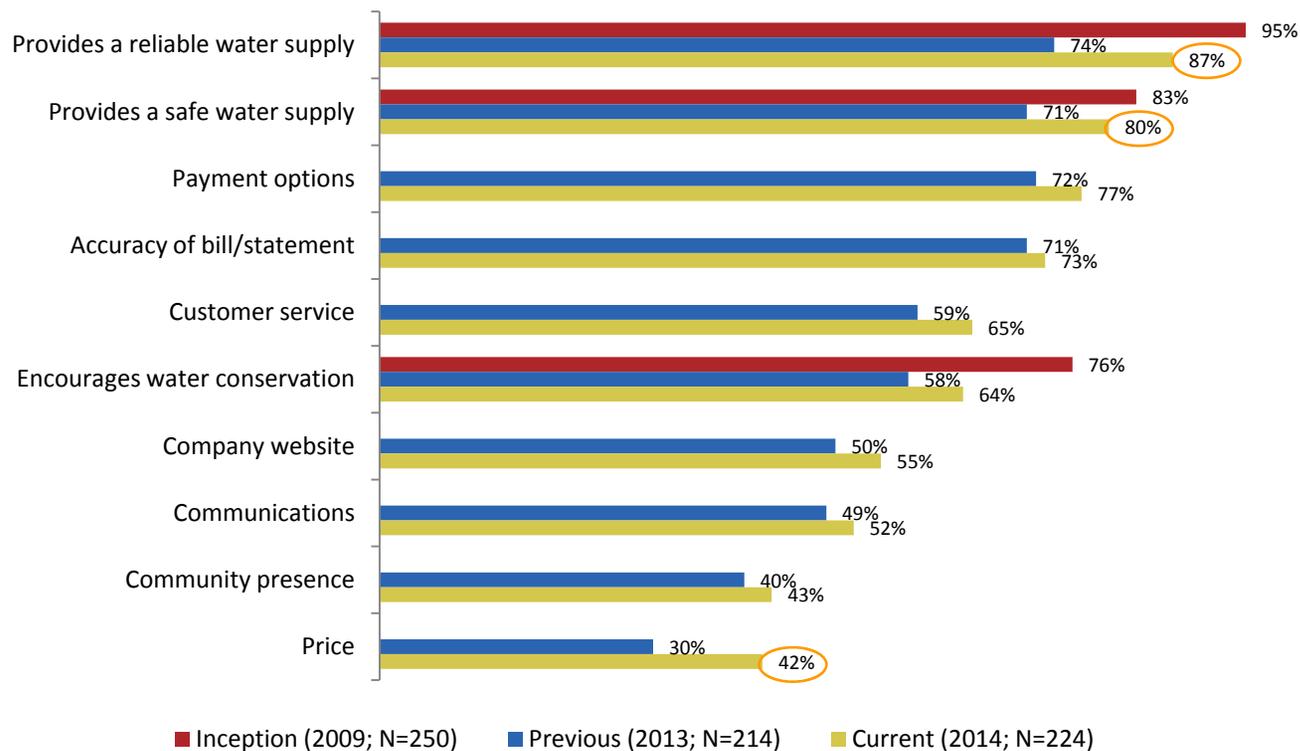
OVERALL SERVICES AND COMPANY

Company Evaluation – Satisfaction

Customers in Central AZ were significantly more satisfied with Liberty Utilities for providing a reliable and safe water supply, along with the price of services. All other metrics were on par with 2013.

Top 2 Box Scores (4,5): 5 = Very Satisfied

Base = Total Respondents



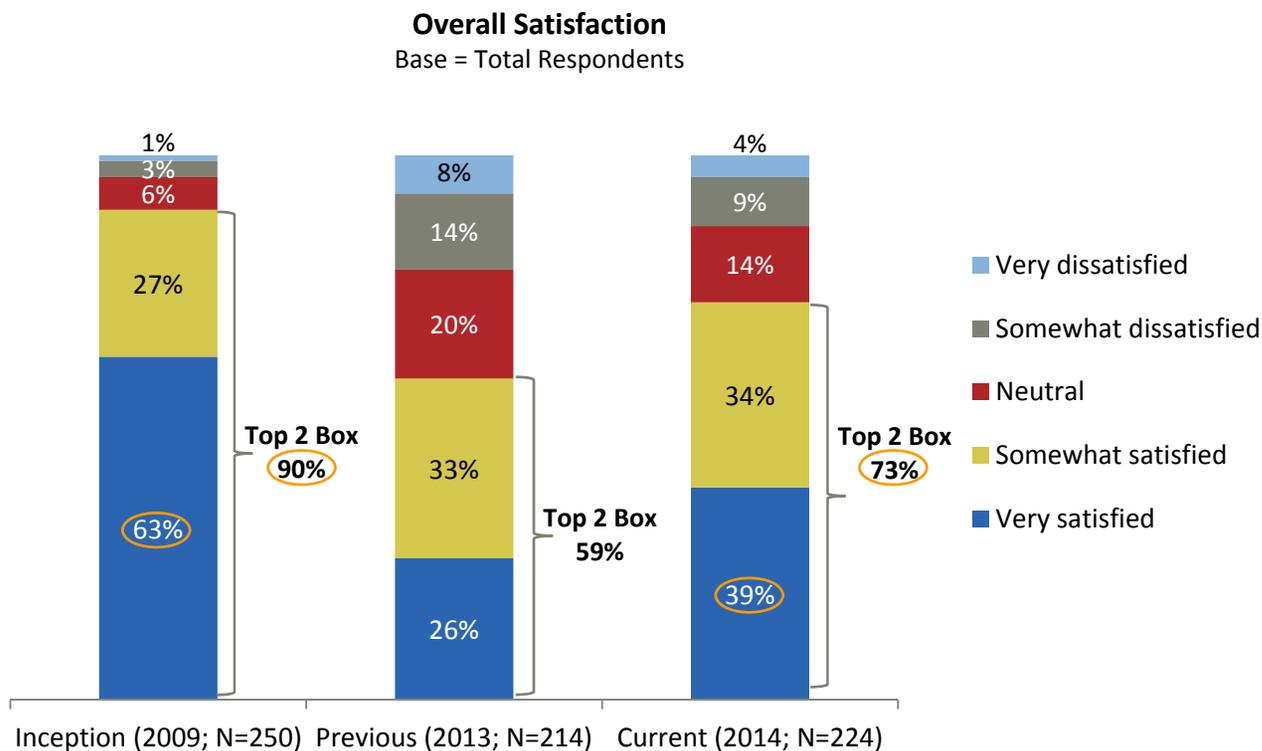
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Q2. Please rate Liberty Utilities in the following areas by using a 5-point scale with 5 being "Very Satisfied" and 1 being "Very Dissatisfied".

Overall Satisfaction

Overall satisfaction with Liberty Utilities rebounded in 2014, increasing significantly from 59% to 73%. However, this did not bring satisfaction back to levels seen in 2009, when 90% of customers in Central AZ were very or somewhat satisfied.



NOTE: Orange circled data indicates significant differences between the years.
Q3. Overall, how satisfied are you with Liberty Utilities?

CENTRAL US

(BIG EDDY, HOLIDAY HILLS, KMB, OZARK MOUNTAIN,
TALL TIMBERS, WOODMARK, HOLLY RANCH, NOEL)

Central US

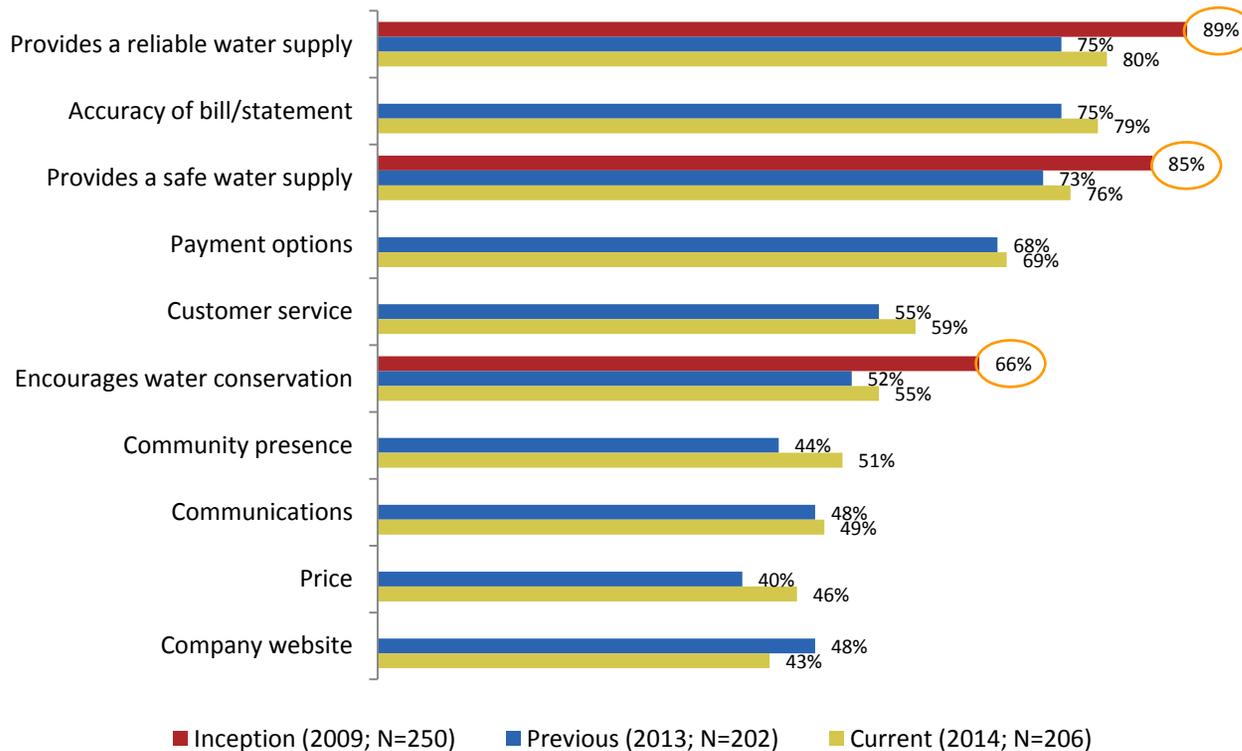
OVERALL SERVICES AND COMPANY

Company Evaluation – Satisfaction

In 2014, satisfaction scores were on par with 2013. Provides a reliable water supply, accuracy of bill/statement, and provides a safe water supply remained the aspects of Liberty that customers were most satisfied with. However, satisfaction scores remained significantly lower than levels seen in 2009.

Top 2 Box Scores (4,5): 5 = Very Satisfied

Base = Total Respondents



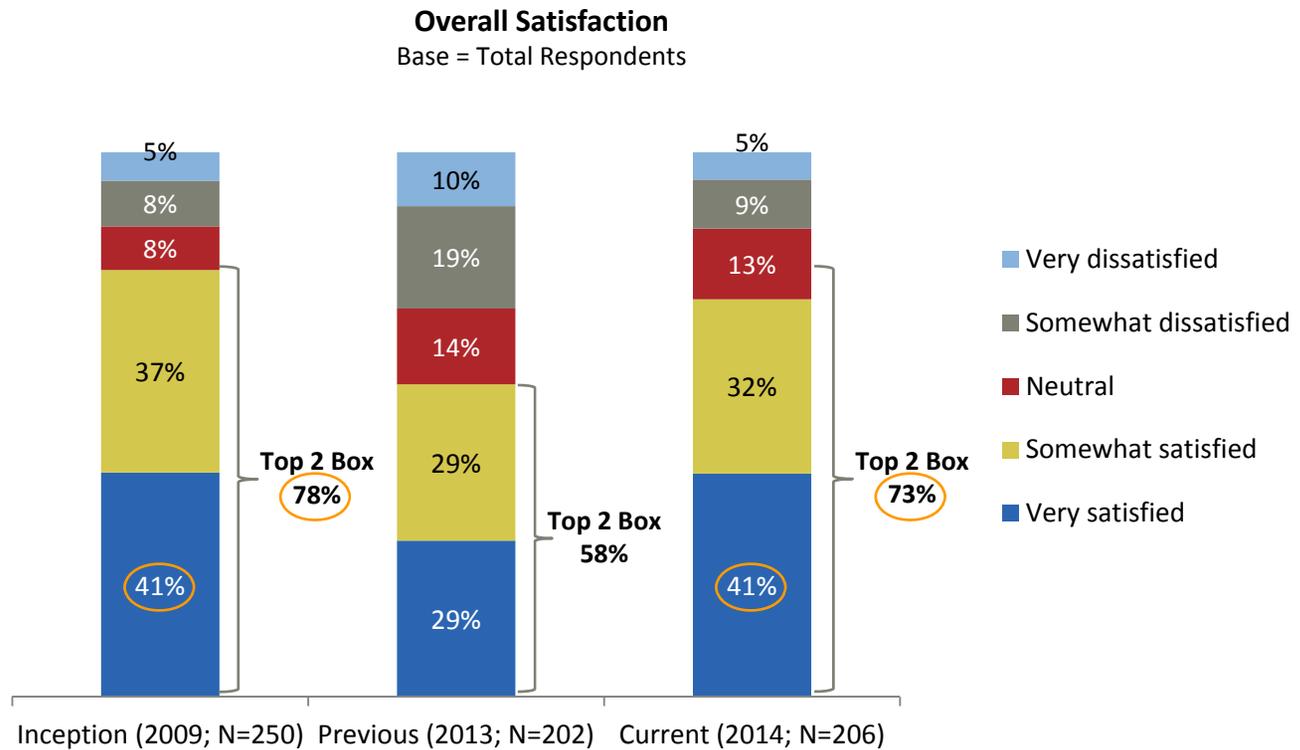
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Q2. Please rate Liberty Utilities in the following areas by using a 5-point scale with 5 being "Very Satisfied" and 1 being "Very Dissatisfied".

Overall Satisfaction

Overall satisfaction with Liberty Utilities significantly improved from 58% in 2013 to 73% in 2014. This was driven by a significant increase in customers reporting that they were very satisfied (from 29% to 41%), returning to levels seen in 2009.



NOTE: Orange circled data indicates significant differences between the years.
Q3. Overall, how satisfied are you with Liberty Utilities?

PSC-036

Regarding: Regulatory mechanisms
Witness: David Pasieka

Describe in detail the “regulatory mechanisms to facilitate investment in plant improvements” that you have developed in other states that you mention on p. 9 of your direct testimony.

Response: Some examples within the Liberty group of utilities are identified and described below, in alphabetical order by state.

Arizona

Liberty’s water utilities in Arizona have the ability to utilize an accelerated recovery mechanism called the Systems Improvement Benefits (“SIB”) mechanism. The SIB was approved by the Arizona Corporation Commission in Decision No. 74437 issued on April 18, 2014. The SIB provides for the timely recovery of capital investments (pre-tax return on investment and depreciation expense, net of associated retirements) associated with distribution system improvement projects that were not included in rate base in the utility’s most recent rate case. As determined in Decision No. 74437, the SIB allows utilities to make significant plant investments to maintain and improve service and repair infrastructure while lessening rate impacts and promoting rate gradualism. Recovery can only occur when the Arizona Corporation Commission approves specific projects in advance of construction, then verifies that they have been completed and placed in service. The intent of the SIB mechanism is to support investment in utility plant in between rate cases while promoting rate gradualism.

Massachusetts

Liberty Utilities (New England Natural Gas Company) Corp., Liberty’s natural gas utility in Massachusetts, has various regulatory mechanisms available, including the following methods allowing for the timely recognition of plant improvements:

Gas System Enhancement Program (“GSEP”). The purpose of this tracker is to comply with the Commonwealth of Massachusetts, Chapter 149 of the Acts of 2014, An Act Relative to Natural Gas Leaks. This legislation requires Liberty to develop a program to replace all leak prone infrastructure over a 20 year target timeframe. The company has prepared a forecast for 2015 capital investment which will be recovered from customer bills beginning May 1, 2015. GSEP results in the capital investment and commencement of recovery of the related costs in rates occurring in the same year. The program also features a reconciling true-up the following year. In essence, this program replaces TIRF (see below) from the standpoint of future investment.

Targeted Infrastructure Recovery Factor (“TIRF”). The purpose of TIRF is to enable recovery of the revenue requirement associated with the replacement of non-cathodically protected steel mains and services and small diameter (eight inches or less in diameter)

cast/wrought iron distribution mains and services without having to file a general rate case each year. This mechanism was authorized in the Company's most recent rate case, DPU 10-114. Each year, the TIRF factor is increased to include the revenue requirement associated with the prior year TIRF additions. The factor is filed each year with the Massachusetts Department of Public Utilities (DPU) on May 1 each year for the previous year's investment and goes into effect on customer bills beginning November 1 of each year.

Missouri

Liberty's natural gas utility in Missouri—Liberty Utilities (Midstates Natural Gas) Corp.—has an accelerated recovery mechanism known as ISRS, or the Infrastructure System Replacement Surcharge. The purpose of ISRS is to recover capital investments in rates on an accelerated basis (return on and return of) primarily related to mains, meters and service lines in between rate cases. If a Company utilizes ISRS, it is required to file a full general rate case every three years. The ISRS is in place for gas utilities and certain water utilities (not including Liberty's small water utility in Missouri at this time) but not electric utilities or wastewater utilities. An ISRS can be filed twice per year and takes approximately five months from the end of the test year to implement new rates. Missouri's ISRS is authorized through legislative statutes.

New Hampshire

Liberty Utilities (EnergyNorth Natural Gas) Corp., Liberty's natural gas utility in New Hampshire, has a mechanism called Cast Iron/Bare Steel ("CIBS") replacement program, under which a portion of leak-prone cast iron and bare steel pipes are replaced each year. The goal of the program is to replace all cast iron/bare steel pipes by 2024. Each year, EnergyNorth proposes a plan to the Commission Staff to review the amount and location of piping that will be replaced in the upcoming construction season. Cost recovery of the revenue requirement associated with the previous year's CIBS work begins on July 1.

Liberty Utilities (Granite State Electric) Corp., Liberty's electric utility in New Hampshire, has a Reliability Enhancement Program/Vegetation Management Program ("REP/VMP") under which the capital and O&M costs associated with system replacements, upgrades and tree trimming that is performed for the purpose of improving reliability are recovered through rates commencing the following year. Each year, Granite State proposes a plan to the Commission Staff for the REP/VMP work that will be performed in the upcoming construction season. Cost recovery of the revenue requirement associated with the previous year's REP/VMP work commences on May 1.

PSC-037

Regarding: Rattlesnake and Miller Creeks
Witness: David Pasioka

- a. Please detail the measures that Liberty will take to protect the wildlife that are dependent on Rattlesnake and Miller Creeks.

Response: For Rattlesnake Creek, Mountain Water will continue to comply with all the requirements for its permitted dams under U.S. Forest Service Regulations, and will continue to apply these same measures to Mountain Water's dams for which permits are not required (Mountain Water's easement dams). These permit requirements include measures to protect wildlife habitat. Mountain Water will continue to operate its intake dam on the main stem of Rattlesnake Creek in coordination with Montana Fish Wildlife and Parks. While Mountain Water's Rattlesnake water rights and dam occupancy permits, easements, and fee titles will remain under Mountain Water's ownership, Liberty also commits to adhering to these same requirements/commitments under which Mountain Water currently operates.

For Miller Creek, Mountain Water has retired 233 acres of historically irrigated land in the Miller Creek Valley, by changing "Irrigation" rights to "Mitigation" rights through the Montana Department of Natural Resources and Conservation ("DNRC") formal change process under Mont. Code. Ann. § 85-2-402. These 233 acres historically were irrigated with surface water diversions out of Miller Creek. This water no longer will be diverted out of Miller Creek, and instead will be left in Miller Creek for instream flow-mitigation purposes. Therefore, wildlife habitat is expected to be greatly improved in the Miller Creek drainage. Mountain Water's Miller Creek water rights will remain under Mountain Water's ownership, and regardless of ownership, under Montana law these rights will be required to be used as instream flow-mitigation purposes into perpetuity.

- b. Will Liberty guarantee that adequate water remains in the creeks to maintain healthy fish and bird populations, as well as recreational opportunities? Why or why not?

Response: For Rattlesnake Creek, Mountain Water has not diverted water out of the Creek since 1983, and has no intention of diverting water out of the creek, except in the case of temporary emergency use as a backup supply. While Mountain Water's Rattlesnake water rights remain under Mountain Water's ownership, Liberty also commits to adhering to this same commitment under which Mountain Water currently operates.

PSC-038

Regarding: Water quality and development
Witness: David Pasieka

- a. Will Mountain Water's water resources be expanded in any way if the transaction is approved? For instance, will Liberty consider bottling and selling Missoula water? Please explain.

Response: Mountain Water's water resources will only be expanded as necessary to accommodate organic growth of Mountain Water's water system and service area, which could include connecting new developments within reach of Mountain Water's water system. As stated previously, Liberty resolves and commits that Mountain Water will not bottle water or use its water rights to bottle water and sell such water outside of the Missoula community. Furthermore, Mountain Water's water rights will continue to be used beneficially by Mountain Water to provide water for its customers and the Missoula community, and will not be diverted outside of the Missoula area for use elsewhere.

- b. What steps will Liberty take to assure that Missoula's water supply remains clean, healthful and plentiful?

Response: Under Liberty's ownership, Mountain Water will continue to monitor water quality as required under the Montana Department of Environmental Quality ("MDEQ"). Mountain Water will also continue its water quality protection programs and activities, including, but not limited to the following:

- Updating and compliance with Mountain Water's Source Water Delineation Assessment Report ("SWDAR");
- Funding for K-8 educational outreach on water resources (currently through funding for the Water Education Network ("WEN");
- Funding for the Montana Groundwater Academy ("MGA"), which is an educational outreach program for high school students on groundwater and surface water interaction-interrelationship. The MGA is operated as part of the University of Montana's SpectrUM program, and funded by an EPA grant with matching funding such as Mountain Water's funding; and
- Mountain Water's independent community outreach/educational campaigns, including paid advertising, as well as an internet and social media presence.

- c. Will the proposed transfer of ownership have any effect on the water quality presently enjoyed by the customers of Mountain Water? Please explain.

Response: No. Under Liberty's ownership, there will be no effect on the water quality presently enjoyed by Mountain Water's customers. As described in the response to part b., above, Mountain Water will continue to monitor water quality as required by the MDEQ. Mountain Water will continue with all of its current water quality programs and water quality protection activities.

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2015, the foregoing Liberty Utilities Co. and Liberty WWH, Inc.'s Responses to Data Requests PSC-028 through PSC-038 was served via electronic and U.S. mail on:

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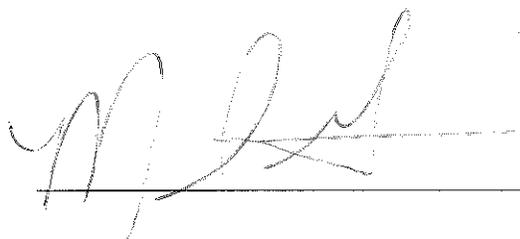
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A handwritten signature in black ink, appearing to read 'Gary M. Zadick', is written over a horizontal line.