

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-039 through PSC-040.**

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.

Submitted this 4<sup>th</sup> day of May, 2015.

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

PSC-039

Regarding: New Hampshire Public Utilities Commission  
Witness: David Pasieka

In your testimony on page 3, ln. 3-4 you state “I have previously testified before the New Hampshire Public Utilities Commission in support of Liberty Utilities’ purchase of two utilities - one electric and one gas – in 2011.” Later on in your testimony on page 8, ln. 8-9 you state “We also intend to retain each and every employee of Mountain Water.”

- a. In the purchase of the two utilities in New Hampshire did you intend to retain each and every employee of those companies?

**Response:** Yes.

- b. If yes, please explain if you did so.

**Response:** Yes. Liberty not only retained the original employee count in New Hampshire, but greatly expanded the local utility staffs after acquisition. 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.

- c. If no, please explain why or why.

**Response:** Please see the response to b.

PSC-040

Regarding: Rate Increase  
Witness: David Pasioka

In your testimony on page 19, ln. 9-10 you state “Customers will not see a rate increase as a direct result of this transaction.” Will customers see any indirect increase or decrease in rates due to this transaction? Please explain.

**Response:** It is impossible to determine the future indirect impacts of Liberty’s acquisition of Mountain Water. As indicated in response to other data requests, Liberty anticipates Mountain Water will benefit from acquisition by and integration into Liberty. However, in the context of a utility undergoing significant capital investment, it is impossible at this time to identify or quantify specific monetary decreases or increases that may be attributable to the new ownership.

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2015, the foregoing Liberty Utilities Co. and Liberty WWH, Inc.'s Responses to Data Requests PSC-039 through PSC-040 was served via electronic and U.S. mail on:

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A handwritten signature in blue ink, appearing to be 'M. L. D.', is written over a horizontal line.