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November 16, 2015

Scott M. Stearns
Natasha Prinzing Jones
BOONE KARLBERG P.C.
P.O. Box 9199
Missoula, MT 59807-9199

RE: Docket No. D2014.12.99

Dear Counsel:

Enclosed please find Liberty Utilities Co. and Liberty WWH, Inc.'s Second Set of Data Requests to the City of Missoula. Please contact our office should you have any questions. Thank you.

Sincerely,

CROWLEY FLECK PLLP



Michael Green

cc: Service List

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

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

**LIBERTY UTILITIES CO. AND LIBERTY WWH, INC.'S SECOND SET OF
DATA REQUESTS TO THE CITY OF MISSOULA
(LIBERTY-088 THROUGH LIBERTY-093)**

DATA REQUESTS

Liberty-088 Re: Hayward's Work for Apple Valley
Witness: David Hayward

- a. Describe Mr. Hayward's work for the Town of Apple Valley regarding the potential acquisition of the Apple Valley Ranchos water system.
- b. Provide copies of all reports Mr. Hayward has prepared for the Town of Apple Valley, with all supporting work papers in native format with links and formulae intact.

Liberty-089 Re: Work for City
Witnesses: Craig Close and David Hayward

- a. Please provide copies of all engagement letters or contracts between the City of Missoula or its attorneys and Messrs.' Close or Hayward
- b. Please provide the total amount Messrs.' Close and Hayward have billed the City of Missoula for work in the condemnation case.
- c. Please provide the total amount Messrs.' Close and Hayward have billed the City of Missoula for work in this matter.

Liberty-090 Re: Reports and Prior Testimony
Witnesses: Craig Close and David Hayward

- a. Please provide copies of all reports, including drafts, Messrs.' Hayward and Close have prepared for the City of Missoula regarding the Mountain Water system, the condemnation case, or this matter.

- b. Please provide copies of all testimony, including depositions, hearings and trials, Messrs.' Hayward and Close have offered in the condemnation case.

Liberty-091 Re: Impacts on Future Operations

- a. Please describe the impacts the City contends Liberty's corporate structure or APUC's foreign domicile will have on future operations of Mountain Water if this transaction is approved.
- b. Please identify and provide copies of all documents or information on which the City relies for its responses

Liberty-092 Re: Harm to Ratepayers

- a. Please describe any and all harm the City contends will result for ratepayers as a result of Liberty's acquisition of Western Water.
- b. Please describe how any of the items identified in response to (a) differ from harms the City contends will exist under the current ownership.
- c. Please identify and provide copies of all documents or information on which the City relies for its responses to (a) and (b).

Liberty-093 Re: Direct Testimony of Mr. Close, Page 6 Close, lines 14-18

- a. Please explain Mr. Close's understanding of the distinction between Contributions in Aid of Construction and Advances for Construction.
- b. Please explain Mr. Close's understanding of the accounting and regulatory treatment for Contributions in Aid of Construction and Advances for Construction.
- c. Please produce all documents used, referred to, or relied upon in responding to subparts (a) and (b).

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2015, the foregoing Liberty Utilities Co. and Liberty WWH, Inc.'s Data Requests Liberty-088 through Liberty-093 was served via electronic and U.S. mail on:

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