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Attorneys for Intervenors The Employees of Mountain Water Company

**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.,
Western Water Holdings, LLC, and
Mountain Water Company for Approval of
Sale and Transfer of Stock

REGULATORY DIVISION

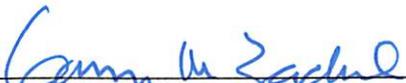
DOCKET NO. D2014.12.99

**THE INTERVENORS/EMPLOYEES OF MOUNTAIN WATER COMPANY'S
RESPONSES TO DATA REQUESTS PSC-050 THROUGH PSC-051**

The Intervenors/Employees of Mountain Water Company, by and through its undersigned counsel, hereby submits to the Montana Public Service Commission these responses to the responses to the first set of data requests from the Montana Public Service Commission.

DATED this 25th day of November, 2015.

UGRIN, ALEXANDER, ZADICK & HIGGINS, P.C.

By: 

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#2 Railroad Square, Suite B
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Attorneys for Intervenors The Employees of
Mountain Water Company

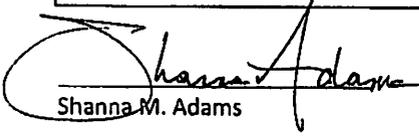
PSC-050 Regarding: Employee Support
Witness: Halley

Please provide a signature page from all employees who support the sale to Liberty. Please indicate in the signature page any employees who did not sign the support page and their reasoning.

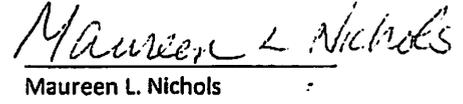
RESPONSE:

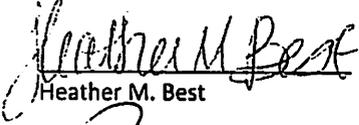
See attached documents: 1) signature page with 100% of Mountain Water's employee's supporting the sale to Liberty and 2) a blank signature page for Mountain Water employees who are not in support of the sale to Liberty Utilities.

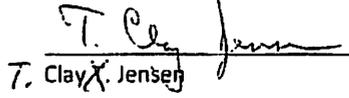
I, as an employee of Mountain Water Company, support the sale to Liberty Utilities. I believe they will allow us to continue to provide exemplary service to the Missoula community. Dated this November 18, 2015

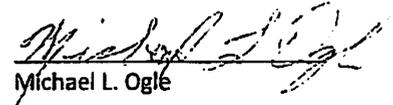

Shanna M. Adams

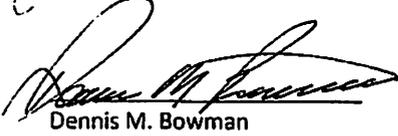

Christina J. Horton


Maureen L. Nichols

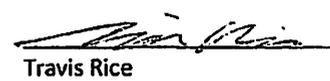

Heather M. Best


T. Clay Jensen

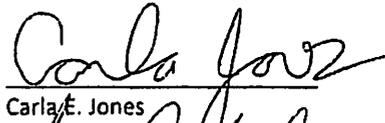

Michael L. Ogle


Dennis M. Bowman

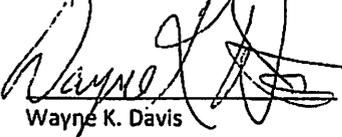

Kevin M. Johnson


Travis Rice

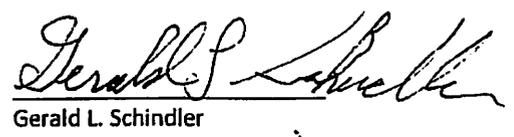

Kathryn F. Datsopoulos


Carla E. Jones

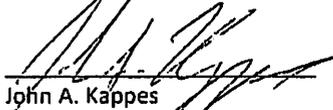

Eric M. Richards


Wayne K. Davis

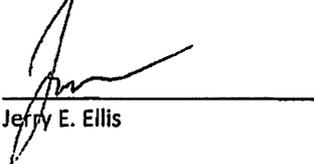

Micky A. Kammerer

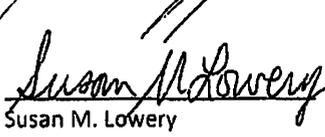

Gerald L. Schindler

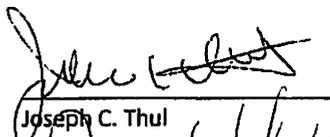

Valarie M. Dowell

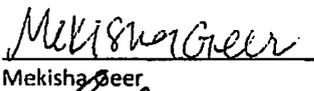

John A. Kappes


Douglas J. Stephens

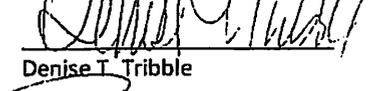

Jerry E. Ellis


Susan M. Lowery

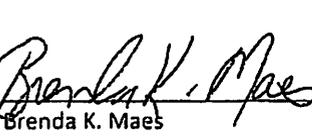

Joseph C. Thul

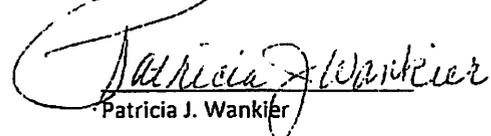

Mekisha Beer


Lee Macholz


Denise T. Tribble


Greg A. Gullickson

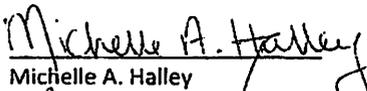

Brenda K. Maes

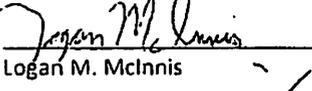

Patricia J. Wankler

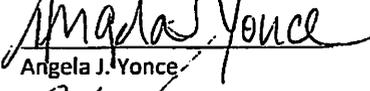

Bradley E. Hafar

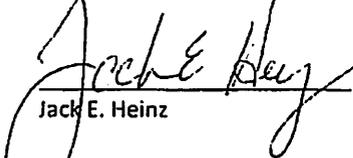

Jason R. Martin

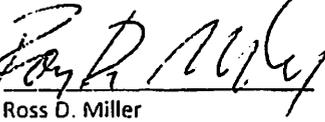

Michael R. Wildey

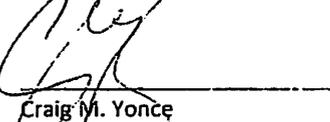

Michelle A. Halley

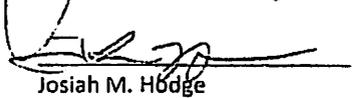

Logan M. McInnis

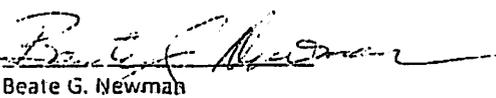

Angela J. Yonce


Jack E. Heinz


Ross D. Miller


Craig M. Yonce


Josiah M. Hodge


Beate G. Newman

I, as an employee of Mountain Water Company, do not support the sale to Liberty Utilities. My reason is stated below. Dated this November 18, 2015

Reason

Employee Signature

Date

PSC-051 Regarding: Labor Costs and Synergies
Witness: Halley

Your testimony focuses on the notion that Liberty's ownership will promote the interests of employees, including through its promise to retain all employees for at least five years and to pay them an equal or better salary.

RESPONSE:

- a. Have employee labor costs of Mountain Water ever been disallowed in consumer rates?**

No.

- b. When is the last time Mountain Water underwent a strategic assessment of its staffing levels, including whether the number of employees that the firm employs is appropriate? Please provide any written product arising from that assessment, if it exists.**

In each and every rate case Mountain Water provides information to the PSC and MCC for audit and data requests pertaining to how many employees it has, which positions have been vacated, the reasons for replacing or not replacing those positions, and the reasons for new positions.

To determine the necessary FTE count in our Operations area, Mountain Water reviews a workload assessment of the activities performed and the amount of time those activities require annually. The change in the number of required activities, as well as changes in customer counts and system size guides decisions on employee counts.

Management experience is the governing factor for determining the need for additional staffing.

- c. Should the Commission be concerned that Liberty is foregoing synergies by pre-emptively making commitments to employees that they will be fully retained and compensated more than at the present time? Please explain.**

No. Liberty has represented that they are committed to serving their customers on a state by state basis. Liberty received all of the information pertaining to wages and benefits as well as the employees' duties and responsibilities. In looking at Mountain Water's staffing and responsibilities, in addition to services Mountain Water has relied on from Park Water, it is easy to assume why Liberty quickly assessed that Mountain Water is staffed appropriately. It is also easy to assume why Mountain Water will be required to undertake additional responsibilities under Liberty's state service model.

CERTIFICATE OF MAILING

I hereby certify that the foregoing was duly served upon the following by mail, Federal Express, Hand-delivery, Facsimile or Email transmission:

U.S. Mail Federal Express Hand-Delivery FAX transmission
 Email

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Missoula, MT 59801
Barbara@clarkfork.org

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kwhitney@mt.gov

DATED this 25th day of November, 2015.



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