

**PUBLIC SERVICE COMMISSION
STATE OF MONTANA**



Brad Johnson, Chairman
Travis Kavulla, Vice Chairman
Kirk Bushman, Commissioner
Roger Koopman, Commissioner
Bob Lake, Commissioner

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November 16, 2015

Mr. Gary M. Zadick
#2 Railroad Square, Suite B
P.O. Box 1746
Great Falls, MT 59403

RE: PSC data requests in Docket D2014.12.99

Dear Mr. Zadick:

Enclosed please find data requests of the Montana Public Service Commission to The Employees of Mountain Water Company (numbered PSC-050 through PSC-051) in the above-referenced docket. Please begin the response to each new numbered data request on a new page. If you have any questions, please contact me at (406) 444-6193.

Sincerely,

Scott Fabel
Regulatory Division
Montana Public Service Commission

Enclosure

cc: Service list

Service Date: November 16, 2015

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

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

DATA REQUESTS PSC-050 THROUGH PSC-051 OF THE
MONTANA PUBLIC SERVICE COMMISSION
TO
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.

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.

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

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