

CROWLEY FLECK PLLP  
ATTORNEYS

D. Wiley Barker  
P.O. Box 797  
Helena, MT 59624-0797  
Direct 406.457.2039  
Fax 406.449.5149  
wbarker@crowleyfleck.com

March 18, 2016

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

Jim Nugent  
City Attorney  
The City of Missoula  
435 Ryman Street  
Missoula, MT 59802  
JNugent@ci.missoula.mt.us

**RE: Docket No. D2016.2.15**

Dear Counsel:

Enclosed please find Mountain Water Company's First Set of Data Requests to the City of Missoula. Please contact our office should you have any questions. Thank you.

Sincerely,

CROWLEY FLECK PLLP



D. Wiley Barker

cc: Service List

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

IN THE MATTER OF the Investigation of the )
Montana Public Service Commission into ) REGULATORY DIVISION
whether Mountain Water Company's rates are )
Just and Reasonable. ) DOCKET NO. D2016.2.15
)

MOUNTAIN WATER COMPANY'S FIRST SET OF DATA REQUESTS TO
THE CITY OF MISSOULA
(MWC-028 THROUGH MWC-036)

DATA REQUESTS

MWC-028 RE: Contentions

- (a) Please state whether the City of Missoula contends Mountain Water Company's current rates are just and reasonable.
(b) Please summarize the basis for your response to (a).

MWC-029 RE: Witness Information

Please state the name, address, and phone number of each person you have contacted as a potential witness in this matter.

MWC-030 RE: Witness Information

Please state the name, address, and phone number of each potential witness whose testimony you may offer in this matter.

MWC-031 RE: Witness Information

With respect to each potential witness identified in MWC-030, please state the following:

- (a) the subject matter on which the witness is expected to testify;
(b) a summary of the testimony the witness is expected to provide;
(c) the substance of the facts and opinions to which each expert is expected to testify; and
(d) a summary of the grounds for the testimony and each opinion.

**MWC-032** RE: Witness Information

Please produce all documents wholly or partially relied upon by each potential witness in the formation of the potential witness's testimony in this matter, including, but not limited to, any reports, memoranda, spreadsheets or presentations prepared by any potential witness in their native format.

**MWC-033** RE: Expert Witness Information

Please produce all testimony each expert witness identified in response to MWC-030 has previously given before any regulatory, judicial or legislative agency, tribunal, or committee.

**MWC-034** RE: Expert Witness Information

For each expert witness identified in MWC-030, please produce a detailed resume of that expert's qualifications, training, publications, awards/honors received, and practical experience. As part of that resume, please include a listing of all matters on which the expert has testified, including depositions, as an expert witness in any other case, which list should include, but not be limited to, the following:

- (a) The date(s) and place(s) of testifying;
- (b) The case caption(s), docket number(s), and venue(s);
- (c) The party(ies) for whom the expert testified and the role of the party(ies);
- (d) The name, address, and telephone number of the attorney(s) who retained the expert in each case; and
- (e) A brief summary of the testimony given by the expert.

**MWC-035** RE: Witness Communications

Please provide all documents, emails and/or communications provided to or received from all witnesses or potential witnesses regarding this matter.

**MWC-036** RE: Documents and Exhibits

Please provide any documents or exhibits that you plan to introduce as exhibits to testimony or at the hearing, in this matter.

**CERTIFICATE OF SERVICE BY MAIL**

I hereby certify that on March 18, 2016, the foregoing was served via electronic and U.S. mail on:

John Kappes  
President & General Manager  
Mountain Water Company  
1345 West Broadway  
Missoula, MT 59802-2239  
johnk@mtnwater.com

Jim Nugent  
City Attorney  
The City of Missoula  
435 Ryman Street  
Missoula, MT 59802  
JNugent@ci.missoula.mt.us

Scott M. Stearns  
Natasha Prinzing Jones  
BOONE KARLBERG P.C  
P.O. Box 9199  
Missoula, MT 59807-9199  
sstearns@boonekarlberg.com  
npjones@boonekarlberg.com

Robert Nelson  
Montana Consumer Counsel  
Box 201703  
Helena, MT 59620-1703  
robnelson@mt.gov

Barbara Chillcott  
Legal Director  
Clark Fork Coalition  
P.O. Box 7593  
Missoula, MT 59801  
barbara@clarkfork.org

Dennis R. Lopach, P.C.  
4 Carriage Lane  
Helena, MT 59601  
dennis.lopach@gmail.com  
ssnow@mt.gov



---

CROWLEY FLECK PLLP