

C R O W L E Y | F L E C K ^{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

Barbara Chillcott
Legal Director
Clark Fork Coalition
432 N. Last Chance Gulch, Suite K
Helena, Montana 59601

RE: Docket No. D2016.2.15

Dear Counsel:

Enclosed please find Mountain Water Company's First Set of Data Requests to the Clark Fork Coalition. 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 CLARK FORK COALITION
(MWC-019 THROUGH MWC-027)**

DATA REQUESTS

MWC-019 RE: Contentions

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

MWC-020 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-021 RE: Witness Information

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

MWC-022 RE: Witness Information

With respect to each potential witness identified in MWC-021, 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-023 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-024 RE: Expert Witness Information

Please produce all testimony each expert witness identified in response to MWC-021 has previously given before any regulatory, judicial or legislative agency, tribunal, or committee.

MWC-025 RE: Expert Witness Information

For each expert witness identified in MWC-021, 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-026 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-027 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