

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

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

**CLARK FORK COALITION'S RESPONSES TO
DATA REQUESTS MWC-019 THROUGH MWC-027
FROM MOUNTAIN WATER COMPANY**

The Clark Fork Coalition, by and through its undersigned counsel, hereby submits the following responses to data requests MWC-019 through MWC-027 from Mountain Water Company.

By: /s/ Barbara Chillcott
Barbara Chillcott
Legal Director
Clark Fork Coalition
432 N. Last Chance Gulch, Ste. K
Helena, Montana 59601

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).

RESPONSE:

Pursuant to Order No. 7475b in this docket, the Clark Fork Coalition's (CFC) intervention is limited to participation in matters related to water conservation and protection. CFC has not taken a position at this time regarding whether Mountain Water Company's (Mountain Water) rates are just and reasonable. CFC will analyze information provided in data responses in this docket to determine whether current rates are just and reasonable from a water conservation and protection standpoint. If CFC decides to take a position, it will supplement its data responses and/or provide that position in any pre-filed testimony.

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.

RESPONSE:

CFC has contacted the following person as a potential witness in this matter:

Karen Knudsen, Executive Director
Clark Fork Coalition
140 S. 4th Street West, Unit 1
Missoula, MT 59801
406-542-0539

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.

RESPONSE:

CFC may offer testimony of the individual listed in response to MWC-020.

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.

RESPONSE:

CFC's testimony has not been formulated. If testimony of Ms. Knudsen is offered, it will focus primarily on the nexus between rates and water conservation and protection.

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.

RESPONSE:

Please see response to MWC-022.

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.

RESPONSE:

Please see response to MWC-025. Testimony previously given by Ms. Knudsen is part of the public record.

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.

RESPONSE:

Please see attached resume of Karen Knudsen.

Ms. Knudsen testified for CFC in Docket No. D2011.1.8 regarding the sale of Mountain Water to the Carlyle Group. Ms. Knudsen testified as an expert witness for the City of Missoula in the condemnation trial held in March 2015. Ms. Knudsen's deposition was taken by Mountain Water and the Carlyle Group prior to the trial as part of those proceedings.

D2016.2.15
Data Response
MWC-025
Resume of
Karen Knudsen

Karen Knudsen

1502 Dickinson • Missoula, Montana 59802
406/529-7836 • karen@clarkfork.org

Professional Summary

Conservation professional with 23 years of experience engaging diverse stakeholders in watershed protection and restoration. Specialize in developing and orchestrating partnerships within community and among nonprofit organizations, government agencies, and businesses to leverage strategies, information, and funds for achieving conservation goals.

Qualifications

- Track record of high-caliber work advancing a conservation vision
 - Strong relationships with key supporters, constituencies, local policymakers, and allies in the Montana conservation community
 - Deep connection to and knowledge of Clark Fork Coalition mission, history, and campaigns
 - Energetic and motivated with recognized skills in communicating program goals to diverse interests
 - Demonstrated passion for the cause for a healthy Clark Fork watershed
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Experience

1993 – Present **Clark Fork Coalition** • Missoula, Montana

Executive Director (January 2007–Present)

Responsible for all aspects of leading and managing river conservation group, with emphasis on fundraising and public relations, program development and planning, and administrative functions. Lead staff and board to raise funds to meet annual revenue goals and budgeted expenses. Manage strategic relationships with funders, elected officials, business and civic leaders. Recruit, develop, and manage a dynamic board. Develop and implement multi-year strategic plans. Oversee fiscally-sound budgeting, forecasting, expense management and cash flow. Recruit, develop, and inspire a diverse and high-performing staff team. Expand the constituent base and achieve goals for marketing, media, and brand management.

Director of Communications & Growth Programs (1995–December 2006)

Directed the Coalition’s communications program, including writing and designing publications, press releases, media plans, educational reports, electronic alerts, marketing and membership materials, and website. Created opportunities for using communications program to build constituency support for the Coalition’s mission.

Simultaneously served as point person for a Coalition campaign to protect waterways from riverside development. Coordinated staff to research and comment on development proposals, regulations, policies, and technical documents. Developed and promoted policies that deliver high-quality, river-sensitive growth.

Business Manager (1993–1995)

Managed financial operations. Developed and monitored budgets; produced cash flow projections; prepared and analyzed financial reports. Maintained general ledger, accounts payable, payroll, and member database. Set-up in-house accounting system.

1999 – 2009

Open Space Advisory Committee • Missoula, Montana
Chair (2000, 2002–2009)

Worked with other volunteer committee members to implement the City of Missoula’s Urban Open Space Plan. Advised City Council on land acquisitions, easements, funding, and related city plans. Provided leadership on bond campaigns.

1991 – 1992

Cascade Holistic Economic Consultants • Portland, Oregon
Research Associate (2000, 002–2009)

Conducted economic, policy, and financial research on national forest management. Helped review and monitor forest plans and timber sales. Analyzed material and prepared reports for clients. Collaborated on educational publications for distribution to forest activists. Edited copy for *Forest Watch* magazine.

Board service: Watershed Restoration Coalition board of directors, Climate Smart Missoula leadership team, Healthy Headwaters Working Group for Carpe Diem West

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.

RESPONSE:

CFC objects to this request on the basis of attorney-client privilege and work product.

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.

RESPONSE:

CFC has not prepared any documents or exhibits. CFC will supplement its response if such documents or exhibits are prepared.

CERTIFICATE OF SERVICE

The foregoing was duly served by mail on the following counsel of record on March 25, 2016:

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By: /s/ Barbara Chillcott