

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

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

**CLARK FORK COALITION'S  
PRE-HEARING MEMORANDUM**

The Clark Fork Coalition (the "Coalition") submits this pre-hearing memorandum in accordance with the Commission's March 7, 2016 Procedural Order and April 4, 2016 Notice of Staff Action.

**Issues.**

The issues in this proceeding are: (1) whether the rates of Mountain Water Company are just and reasonable, given the unauthorized transfer of ownership of Mountain Water Company from The Carlyle Group to Algonquin Power & Utilities Corporation/Liberty Utilities in January 2016; and (2) whether Mountain Water Company has violated the ring-fencing provisions established by the Commission in Order 7149(d) Docket No. D2011.1.8 (Dec. 4, 2011). Notice of Investigation and Intervention Deadline (Feb. 3, 2016); Order 7475 (Feb. 8, 2016).

**Witnesses and Exhibits.**

The Coalition's intervention in this docket is limited to matters concerning water protection and conservation. The Coalition will not introduce witnesses or exhibits at the hearing, unless water conservation and protection become the subject of testimony of

another party. If water conservation and protection are a topic of witness testimony, the Coalition reserves the right to cross-examine witnesses regarding such testimony and/or provide rebuttal testimony. If rebuttal testimony is provided, the Coalition will call Karen Knudsen, Executive Director, as a rebuttal witness.

**Special Needs.**

The Coalition has no special needs with respect to witness sequence or scheduling.

Respectfully submitted this 28th day of April, 2016.

**CLARK FORK COALITION**

By: /s/ Barbara Chillcott

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## CERTIFICATE OF SERVICE

I hereby certify that on this, the 28<sup>th</sup> day of April, 2016, the foregoing CLARK FORK COALITION'S PRE-HEARING MEMORANDUM was served via U.S. mail and electronic mail on:

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By: /s/ Barbara Chillcott  
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