

C R O W L E Y | F L E C K <sup>PLLP</sup>  
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March 18, 2016

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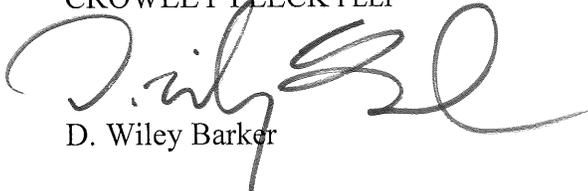
**RE: Docket No. D2016.2.15**

Dear Counsel:

Enclosed please find Mountain Water Company's First Set of Data Requests to the Montana Consumer Counsel. 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 MONTANA CONSUMER COUNSEL  
(MWC-001 THROUGH MWC-009)**

**DATA REQUESTS**

**MWC-001** RE: Contentions

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

**MWC-002** 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-003** RE: Witness Information

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

**MWC-004** RE: Witness Information

With respect to each potential witness identified in MWC-003, 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-005** 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-006** RE: Expert Witness Information

Please produce all testimony each expert witness identified in response to MWC-003 has previously given before any regulatory, judicial or legislative agency, tribunal, or committee.

**MWC-007** RE: Expert Witness Information

For each expert witness identified in MWC-003, 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-008** 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-009** 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:

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