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Attorneys for Mountain Sewer Corp.

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH	
IN THE MATTER OF THE APPLICATION OF MOUNTAIN SEWER CORPORATION FOR GENERAL RATE INCREASE	Docket Nos. 11-097-01, 11-097-02, and 11-097-03 Mountain Sewer Corporation's Response to Intervener's Motion to Compel Data Response

Mountain Sewer Corporation ("Mountain Sewer"), through undersigned counsel, hereby responds to Interveners Larry Zini's and Sharon Zini's ("Intervener") "Motion to Compel Data Response; Request for Sewer Extension of Filing Deadline; and Request for Expedited Treatment June 15, 2012" as follows:

Mountain Sewer served its response to Intervener's data request on July 2, 2012, as evidenced by the certificate of service, attached as an Exhibit hereto. Intervener's motion to compel is therefore moot, and no action by the Commission is necessary on the motion to compel.

In its response to the data request, Mountain Sewer offered to make all relevant and responsive documents available for inspection by Intervener at a mutually agreeable time and place. As of this date, Mountain Sewer has received no correspondence, calls or other contact from Intervener to set up arrangements for documents inspection.

Intervener's motion also included a request for adjustment(s) of certain deadlines. Mountain Sewer submits that the parties can still easily meet the current schedule. Mountain Sewer's data request response was served on July 2, 2012, more than six weeks before Intervener's pre-filed direct testimony is due (on August 16, 2012). Subsequent deadlines for rebuttal and sur-rebuttal testimony, as well as the October 16th and 17th hearing dates, remain reasonable and appropriate, and need not be adjusted, absent a showing of need by Intervener. Intervener has made no showing of good cause for the suggested schedule delays, and Mountain Sewer submits that the general rate case should proceed as scheduled.

Dated: July 10, 2012

/s/Richard K. Rathbun
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Richard K. Rathbun
SMITH HARTVIGSEN, PLLC
Attorneys for Mountain Sewer

DOCKET NOS. 11-097-01, 11-097-02, AND 11-097-03
CERTIFICATE OF SERVICE

This is to certify that on the 10th day of July, 2012 and true and correct copy of the foregoing **Response to Intervener Motion to Compel Data Response** was sent to the following as indicated below:

Via hand delivery (Original plus five copies):

Public Service Commission
Attn: Gary Widerburg
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111

Via email:

psc@utah.gov (both the filed pdf version and an electronic copy in Word format)

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