

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Mountain Sewer Corporation and Lakeview Water Corporation -
Formal Complaint and Supplemental, Notice of Intent to Sell Mountain Sewer Corp. and Lakeview Water Corp., and Application of Mountain Sewer for a General Rate Case Increase

:

Docket Nos. 11-097-01, 11-097-02, and 11-097-03

Complainants Response to Mountain Sewer Corp.'s Response to Intervener's Motion to Compel Data Response
July 13, 2012

:

Larry and Sharon Zini
Complainants
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Complainants, by and through Larry and Sharon Zini (Zinis), the undersigned, are responding to Mountain Sewer Corporation's July 10, 2012 Response to Intervener's Motion to Compel.

In their Motion to Compel the complainants requested an order from the Public Service Commission (the PSC) commanding petitioner Mountain Sewer Corp. and Lakeview Water Corp. and their counsel, J.Craig Smith to respond to Zinis' Intervener's Initial Data Request on

Docket Nos. 11-097-01, 11-097-02 and 11-097-03 propounded on April 27, 2012 within three days of the PSC's order for them to do so.

On July 2 Mountain Sewer did reply in part to the data request for records. However the lawyers for the corporations refused to provide anything related to Lakeview Water, stating that it is a separate corporation. Thereby they have failed to comply in total to the Intervener's Initial Data Request.

Their response read in part that "The Zinis assert the Company and its counsel have ignored the Zini's requests for data they seek in connection with their participation in the Company's general rate increase application. " Nowhere in Complainants Motion to Compel did we make such a statement, but referenced our participation in all three docket numbers 11-097-01, 11-097-02 and 11-097-03.

On May 14, 2012 the PSC issued a scheduling order on all three of the dockets noted above stating that "the Commission held a duly-noticed scheduling conference to determine a schedule for addressing the applications and the consolidated matters captioned

above.” The request by the Complainants for data from Lakeview Water goes directly to docket number 11-097-01, the Formal Complaint and Supplement which has been consolidated into the schedule order issued on May 14, 2012.

Therefore we ask the PSC to proceed with the currently scheduled hearing to show cause on Thursday, July 19, 2012 commencing at 9:00 a.m.

Respectfully submitted,

Larry Zini, Complainant

Sharon Zini, Complainant

Cc: David Clark, Legal Counsel, Utah Public Service Commission

Certificate of Service

I hereby certify that all parties as noted below were furnished with an electronic copy of our Response to Mountain Sewer's Response to Intervener's Motion to Compel and that a copy of this response was mailed to Mountain Sewer this 13th day of July 2012.

By U.S. Mail postage prepaid:

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