SCHEDULE A



Liberty Utilities (Missouri Water) LLC. Docket No. WR-2018-0170 Silverleaf Data Request –4

Page **1** of **1**

Data Request Received: 03/30/18 Request No. 4 Date of Response: 05/03/18 Respondent: Jill Schwartz

DATA REQUEST:

Please provide the names of all individuals that would testify on behalf of Liberty Utilities regarding its requested rate increase, including the subject matter of said person's testimony.

- a. Specifically, provide the name of the individual(s) that would testify regarding the Liberty Utilities' rate consolidation proposal.
- b. Provide the name of the individual(s) that would testify regarding return on equity and capital structure on behalf of Liberty Utilities.
 - i. Provide all work papers or other analysis the Company has conducted regarding return on equity and capital structure.
 - Provide a description of all communications between the Company and any member of the Staff of the Missouri Public Service Commission regarding this issue of the return on equity or capital structure in this matter. If such communications are written, please provide the written communication(s).
- c. Provide the name of the individual that would testify on behalf of the Company regarding customer complaints and the Company's response to customer complaints.
- d. Provide the name of the individual(s) that would testify on behalf of Liberty Utilities regarding the allocation of corporate expenses to Liberty Utilities' water and sewer systems.

RESPONSE

Until the Company understands what specific issues would be tried, it is unable to identify the individuals that would testify on behalf of Liberty Utilities.