

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application)
Of a Rate Increase) Case No. WR-2017-0259
For Indian Hills Utility)
Operating Company, Inc.)

MOTION FOR JOINT PROPOSED PROCEDURAL SCHEDULE

COMES NOW the Staff of the Missouri Public Service Commission, the Office of the Public Counsel, and Indian Hills Utility Operating Company, Inc., (the “Parties”) and, tender this *Joint Proposed Procedural Schedule*, stating:

Discovery Conditions

1. The Parties agree as follows with respect to Data Requests, Requests for Admissions, Request for Interrogatories, or Request for Production of Documents and Things:

(A) Consistent with 4 CSR 240-2.090(G), the Parties agree that, starting September 20th, 2017, the response time for all data requests shall be seven (7) calendar days with four (4) calendar days to object or to notify the requesting party that more than seven (7) calendar days will be needed to provide the requested information.

(B) The Parties shall make an effort to resolve all discovery disputes well before the hearing; however, the Parties shall present any outstanding motions to compel to the regulatory law judge at the beginning of the evidentiary hearing.

(C) The Parties shall make an effort not to over-designate information as confidential. If confidential information must be included in data request questions, the confidential information should be appropriately designated as such pursuant to 4 CSR 240-2.135. Responsibility to make this designation is upon the Party claiming such. Other

Parties are entitled to rely on the presence or absence of such designation.

(D) When serving a data request, the party serving the request will send to counsel for each party an electronic copy of the text of the “description” of that data request contemporaneously with service of the data request. Regarding Staff-issued data requests, if the description contains confidential information or is voluminous, a hyperlink to the EFIS record of that data request is a sufficient copy. If a party desires the response to a data request that has been served on another party, the party desiring a copy of the response shall request a copy of the response from the party answering the data request. Data requests, objections to data requests, and notifications respecting the need for additional time to respond to data requests will be sent by e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list for data requests, but assumes responsibility for compliance with any restrictions on confidentiality. Data request responses shall be served electronically, if feasible and not voluminous as defined by Commission rule, on counsel for the requesting party, unless counsel for the requesting party requests otherwise in writing. Responses to Staff data requests must be submitted in EFIS, if feasible, or in electronic format on compact disc or by other means agreed to by Staff counsel, if infeasible. All data requests to Staff must be submitted in EFIS.

Proposed Procedural Schedule and Conditions

2. The Parties recommend that the Commission adopt the following Procedural Schedule:

<u>Item</u>	<u>Date</u>
Local Public Hearing	October 4, 2017
Settlement Conference	October 6, 2017
Direct Testimony	October 13, 2017
Rebuttal Testimony	October 27, 2017
Surrebuttal Testimony	November 13, 2017
Settlement Conference	November 16, 2017
Last Day to Request Discovery	November 17, 2017
Reconciliation	November 17, 2018
List of Issues, List and Order of Witnesses, Order of Opening, and Order of Cross-Examination	November 20, 2017
Statement of Position	November 22, 2017
Evidentiary Hearing	November 27-28 and 30 th OR December 19-20 ¹
Brief	December 20, 2017 OR January 4, 2017
Final Presentation Date 4 CSR 240-3.050(24)	January 4, 2018
Operation of Law Date	March 4, 2018

¹ The Parties Agree that, if an earlier date for an evidentiary hearing is made available through a full or a partial settlement of issues in GR-2017-0215, then the Parties are willing to accept an earlier evidentiary hearing date in December upon reasonable notice of the change.

WHEREFORE, Staff, OPC, and Indian Hills pray that the Commission will establish the Procedural Schedule as set out herein.

Respectfully Submitted,

/s/ Nicole Mers

Nicole Mers
Legal Counsel
Missouri Bar No. 66766
P.O. Box 360
Jefferson City, MO 65102
573-751-6651 (Voice)
573-751-9285 (Fax)
Nicole.Mers@psc.mo.gov
Attorney for the Staff of the
Missouri Public Service Commission

/S/ Dean L. Cooper

Dean L. Cooper
Missouri Bar No. 36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65012
(573) 635-7166 telephone
dcooper@brydonlaw.com
ATTORNEYS FOR INDIAN HILLS UTILITY
OPERATING COMPANY, INC.

/s/Ryan Smith

Ryan Smith
Missouri Bar No. 66244
Senior Counsel
PO Box 2230
Jefferson City, MO 65102
P: (573) 751-4857
F: (573) 751-5562
E-mail: ryan.smith@ded.mo.gov
ATTORNEY FOR THE OFFICE
OF THE PUBLIC COUNSEL

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on September 19, 2017, to counsel of record.

/s/ Ryan D. Smith