

Dean Cooper

From: dcooper@brydonlaw.com
Sent: Friday, November 10, 2006 2:56 PM
To: Phil.Williams@psc.mo.gov
Cc: dcooper@brydonlaw.com
Subject: Case No. WR-2006-0425 - Data Request No. 0049
Attachments: 20061110145536353.html; dr 0049 rate case costs aws pr.pdf; dr 0049 costs ii hc.pdf

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0049
Company Name	Algonquin Water Resources of Missouri, LLC-(Water)
Case/Tracking No.	WR-2006-0425
Date Requested	10/13/2006
Issue	Expense - Rate Case Expense
Requested From	Dean L Cooper
Requested By	Phil Williams
Brief Description	Please provide bills from all parties for rate case expense.
Description	In reference to rate case expense, please provide the following information. 1) Please provide a the invoices for Mr. Loos to date with a detailed description of the services provided. Please update as addition invoices are received. 2) Please provide an estimate of the additional costs from Mr. Loos for the rate case. 3) Please provide detailed invoices for all legal services associated with this rate case. Please update as additional invoices are received. 4) Please provide an estimate of the additional costs for legal service for this rate case. 5) Please provide a detailed analysis of the cost included by the Company for rate case expense in the current case.
Response	1) See the attached. 2) Black & Veatch's additional charges are extremely difficult to estimate as they are a function of the number and complexity of additional data requests, the issues and arguments raised by Staff and the Office of the Public Counsel in their direct and rebuttal testimony, and the duration of the hearings. Mr. Loos believes for planning purposes that additional billings will amount to something on the order of \$35,000 to \$40,000. 3. See the attached. 4. Legal expenses are extremely difficult to estimate as they are a function of the number and complexity of additional data requests, the issues and arguments raised by Staff and the Office of the Public Counsel in their direct and rebuttal testimony, the nature of any prehearing motion, the number of issues that are ultimately litigated, the duration of the hearings and the nature of the required briefing. It is estimated for planning purposes that additional legal expenses associated with this case will amount to something on the order of \$55,000 to \$60,000. 5. The original estimate of \$225,000 (\$45,000 per utility) is a figure that Algonquin included in its 2006 budget. It was developed as a gross estimate of the cost of legal, consulting services, and Commission assessments directly related to Algonquin's planned filing. Algonquin did not make any detailed analysis in

preparing this budget estimate.
Objections NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **WR-2006-0425** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Algonquin Water Resources of Missouri, LLC-(Water)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Algonquin Water Resources of Missouri, LLC-(Water)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security : Highly Confidential

Rationale : Reports or other documentation related to work produced by counsel and confidential or private financial and business information.

With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.

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