

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

In the matter of the Application of	)	
Folsom Ridge LLC and Big Island	)	
Homeowners Water and Sewer Association,	)	
Inc. for an order authorizing the transfer	)	Case No. WO-2007-0277
and Assignment of Certain Water and	)	
Sewer Assets to Big Island Water	)	
Company and Big Island Sewer	)	
Company, and in connection therewith	)	
certain other related transactions.	)	

**APPLICANTS' FIRST SET OF DATA REQUESTS  
TO INTERVENER WILLIAM T. FOLEY, II**

COME NOW Applicants and propound to Intervener William T. Foley, II the following data requests to be answered within the period of time provided by rules or orders of the Commission. These data requests are of a continuing nature requiring you to file supplemental answers and responses setting forth any additional or different information within the scope of these data requests as may be acquired by you, your agents, attorneys or representatives following your original responses.

**DEFINITIONS**

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 the intervener named above, his/her employees, contractors, agents or others employed by or acting in his or her behalf.

The term "Commission" shall mean and refer to the Missouri Public Service Commission.

The term "Big Island" shall mean and refer to that region referred to as Big Island, Lake of the Ozarks, and further described in the Application.

The terms "Folsom Ridge" and "the Association" shall be abbreviations of the names of the applicants in this case.

Where identification of a person is requested, state that person's name, business address, position of employment and telephone number. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report, email) 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.

## DATA REQUESTS

1. State your full name, including any and all names by which you have ever been known, your address and date of birth.

RESPONSE:

2. State:

- A. your present address and the length of time you have resided at that address;
- B. any other addresses at which you have lived during the past ten years.

RESPONSE:

3. Give the name and address of your present employer, your occupation or job title, your job duties or responsibilities, the date such employment began, and the name of your immediate supervisor.

RESPONSE:

4. If you have had any employment within the past five years other than as shown in your RESPONSE to data request number 3, then state the names and addresses of all other employers for whom you have worked during the past five years, your occupation or job title with each, your job duties or responsibilities with each, the beginning and ending dates of each such employment and the name of each of your immediate supervisors.

RESPONSE:

5. If you are now or have during the past five years been self-employed, please state the date of such self-employment, the location of the business, the name of the business, and the nature of your business.

RESPONSE:

6. State in chronological order all schools, colleges, universities, trade schools or other institutions of learning you have attended and for such institution state:

- A. the name and address of each such institution;
- B. the dates of your attendance;
- C. the highest grade completed;
- D. all degrees awarded you and the name of the institution from which such degree was obtained; and
- E. any and all scholastic honors, awards or recognition you received stating when, where and from whom.

RESPONSE:

7. Please state the name and address of each person whom you expect to call as an expert witness at hearing of this matter and state the general nature of the subject matter in which each expert is expected to testify. In addition, state the occupation, place of employment and qualification to give any such opinions for each such expert and, in addition, please attach a copy of each such expert's curriculum vitae (CV) to your response to these data requests. Also, state each such expert's hourly deposition fee.

RESPONSE:

8. State the names and addresses of non-retained expert witnesses you anticipate calling upon trial of the above-entitled action and state briefly the subject matter to which you expect each such non-retained expert to testify. In addition, state the occupation, place of employment and qualification to give any such opinions for each such expert and, in addition, please attach a copy of each such expert's CV to your response to these data requests. Also, state each such expert's hourly deposition fee.

RESPONSE:

9. Have you ever been a party in any other legal action, as a defendant, plaintiff or intervener or other classification, including criminal cases? If so, state:

A. The date and place each such action was filed, giving the name of the court, the name of the other party or parties involved, the number of such actions, and the names of the attorneys representing each party;

B. The nature of each such action; and

C. For each criminal case, please state whether you have ever been convicted of, pleaded guilty to, or received a suspended imposition of sentence for, a felony or misdemeanor. If so, please describe the offense to which the conviction, guilty plea or suspended sentence was made or entered.

RESPONSE:

10. Have you paid either of the Applicants in this proceeding a fee for the right or privilege to connect to a water or sewer system (a connection or tap fee.). If yes, state the amount of the connection (or tap) fee, the date it was paid and to which Applicant it was paid.

RESPONSE:

11. Are you connected to water distribution system or wastewater collection and treatment system referred to in the Application in this proceeding. If so, state:

- a. The system(s) to which you are connected
- b. The date you connected to each system.

RESPONSE:

12. Are you paying either of the Applicants in this proceeding for sewer service or water service. If so, state the amount you pay, for what services or reasons it is paid, when it is paid and to which Applicant it is paid.

RESPONSE:

13. If you are not now connected to either the water distribution system or wastewater collection system described in the Application, state:

- a. whether you intend to connect to either system; and if you do intend to connect,
- b. state the approximate date you intend to apply for connection to the system.

RESPONSE:

14. Do you oppose the relief requested in the Application in this case? If so, state each and every reason why you oppose the relief requested in the Application.

RESPONSE:

15. Would you favor the relief requested in the Application if conditions were imposed by the Commission on the proposed transfer of assets. If so, state those conditions.

RESPONSE:

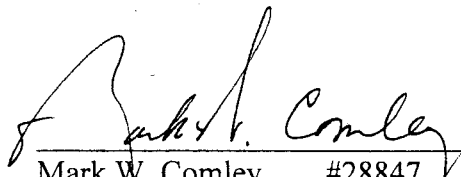
16. If you obtained any information or assistance from any person(s) in preparing your responses to these data requests, then for each data request, please state the name, address, telephone number, employer and job title of each person providing information to or assisting you.

RESPONSE:

17. If you utilized any documents or tangible things in preparing your responses to these data requests then, for each data request, identify each such document or tangible thing utilized and the name, address, telephone number, employer and job title or position of the custodian of each document or tangible thing.

RESPONSE:

Respectfully submitted,



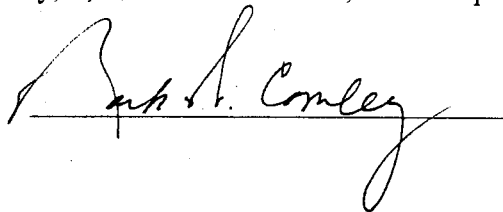
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Attorneys for Folsom Ridge, L.L.C, and Big  
Island Homeowners Water and Sewer  
Association, Inc., f/k/a Big Island  
Homeowners Association, Inc.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, to William T. Foley, II, 15360 Kansas Ave., Bonner Springs, KS 66012, on this 8th day of February, 2007.



STATE OF MISSOURI     )  
                                      )  
COUNTY OF \_\_\_\_\_ )     ss.

William T. Foley, II, being duly sworn on his oath, states that the matters set forth in the foregoing responses to data requests are true and correct according to the best of his knowledge, information and belief.

\_\_\_\_\_  
William T. Foley, II

Subscribed and sworn to before me on this \_\_\_\_\_ day of \_\_\_\_\_, 2007.

\_\_\_\_\_  
Notary Public

My Commission expires:

\_\_\_\_\_