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John G. Gliege (#003644)  
Attorney for Pine Strawberry Water Improvement District

**BEFORE THE ARIZONA CORPORATION COMMISSION**

IN THE MATTER OF THE APPLICATION  
OF PINE WATER COMPANY FOR A  
DETERMINATION OF THE CURRENT  
FAIR VALUE OF ITS UTILITY PLANT AND  
PROPERTY, A RATE INCREASE AND FOR  
APPROVAL TO INCUR LONG-TERM DEBT.

DOCKET NO. W-03512A-03-0279  
OBJECTIONS TO FIRST DATA REQUESTS  
OF PINE WATER COMPANY

Arizona Corporation Commission

DOCKETED

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COMES NOW THE PINE STRAWBERRY WATER IMPROVEMENT DISTRICT, an  
Intervenor in the above captioned action and hereby submits its Objections to the First Data Requests of  
the Pine Water Company submitted to the Pine Strawberry Water Improvement District, to wit:

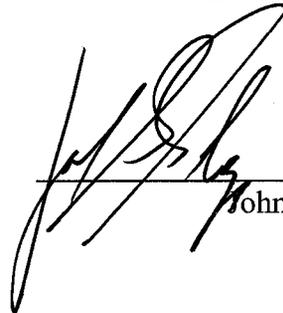
1. Pine Strawberry Water Improvement District (hereinafter "PSWID") objects to question number 1.1 on the grounds and for the reasons that the term "work papers" contained therein is not defined, thus the question is unintelligible.
2. PSWID objects to question number 1.4 on the grounds that the precise ownership is reflected in appropriate documentation in the possession of the Pine Water Company. On the basis of information and belief based upon information from Pine Water Company Project Magnolia is owned by Brooke Utilities Inc.
3. PSWID objects to question number 1.20 on the grounds and for the reasons that it does not identify any public utilities owned by Brooke Utilities, Inc. Therefore, it is not possible to answer the question.
4. PSWID objects to questions 1.22 and 1.23 on the grounds that the questions call for a conclusion of law.

- 1 5. PSWID objects to question 1.25 on the grounds that a portion of it calls for conclusions of  
2 law, and a portion of it which implies that Brooke Utilities Inc. owns Pine Water Company  
3 and Strawberry Water Company, is not supported by public record, the Annual Reports of  
4 Pine Water Company and Strawberry Water Company for the year 2002 show that they are  
5 owned by Crystal Investments L.L.C., not by Brooke Utilities, Inc.
- 6 6. PSWID objects to question 1.26 on the grounds that the public records do not reflect that  
7 Brooke Utilities owns any public service corporations in question in this matter.
- 8 7. PSWID objects to question 1.37 on the grounds that the question calls for a conclusion of  
9 law and that the question contains multiple questions and attempts to tie together facts or  
10 events which may be unrelated.
- 11 8. PSWID objects to question 1.40 to the extent that the same requires the performance of any  
12 additional analysis or other extensive work to provide a full and complete answer to the  
13 same.
- 14 9. PSWID objects to question 1.42 on the grounds that it calls for a conclusion of law.
- 15 10. PSWID objects to question 1.43 on the grounds that the same calls for conclusions of law.
- 16 11. PSWID objects to question 1.45 on the grounds of the best evidence rule.
- 17 12. PSWID objects to question 1.47 on the grounds and for the reasons that the statement made  
18 regarding the shareholder of Pine Water Company is not supported by the public filings  
19 made by Pine Water Company, see Annual Report filed in 2002.

20  
21 Respectfully submitted this 12<sup>th</sup> day of November, 2003.

22 LAW OFFICE OF JOHN G. GLIEGE

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John G. Gliege

1 Original and thirteen copies of the foregoing  
2 sent this 12<sup>th</sup> day of November, 2003 to:

3 Docket Control Center  
4 Arizona Corporation Commission  
5 1200 W. Washington Street  
6 Phoenix, AZ 85007

7 Copies of the foregoing  
8 Mailed this 12<sup>th</sup> day of  
9 November, 2003 to :

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