



1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 WILLIAM A. MUNDELL  
CHAIRMAN  
3 JIM IRVIN  
COMMISSIONER  
4 MARC SPITZER  
COMMISSIONER  
5

6 IN THE MATTER OF THE COMPLAINT OF  
PETER AND PATRICIA GOSHIA d/b/a BURRO  
7 INN AGAINST CITIZENS COMMUNICATIONS  
COMPANY  
8

Docket No. E-01032A-01-0348

**LIST OF WITNESSES AND  
EXHIBITS**

9 Citizens Communications Company hereby files the following list of witnesses  
10 for the September 6, 2001 hearing, along with brief statements of their expected testimony.

- 11 1. Amanda Rivero  
Energy Services Representative  
12 c/o Todd C. Wiley, Esq.  
Gallagher & Kennedy, P.A.  
13 2575 East Camelback Road  
Phoenix, Arizona 85016-9225  
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15 Ms. Rivero is an Energy Service Representative. She is expected to testify  
16 regarding dealings with Mr. Goshia and investigation of Mr. Goshia's complaint in this docket.  
17 Specifically, Ms. Rivero is expected to testify that Citizens properly applied company tariffs to  
18 Mr. Goshia; that Citizens billings and charges were correct; that Mr. Goshia's complaints are  
19 unsupported; and regarding Mr. Goshia's payment history. Ms. Rivero also is expected to testify  
20 regarding Staff's investigation of Mr. Goshia's complaints.

- 21 2. Eddie Jimenez  
Journeyman Meterman  
22 c/o Todd C. Wiley, Esq.  
Gallagher & Kennedy, P.A.  
23 2575 East Camelback Road  
Phoenix, Arizona 85016-9225  
24

Arizona Corporation Commission

**DOCKETED**

AUG 9 8 2001

DOCKETED BY *ml*

GALLAGHER & KENNEDY, P.A.  
2575 E. CAMELBACK ROAD  
PHOENIX, ARIZONA 85016-9225  
(602) 530-8000

1 Mr. Jimenez is a journeyman meterman. He is expected to testify regarding  
2 testing and validation of Mr. Goshia's service meter; verification of Mr. Goshia's electric service  
3 charges; Staff's investigation of Mr. Goshia's complaints; that Citizens billings and charges were  
4 correct; and that Mr. Goshia's complaints are unsupported;

5 3. Ernesto Ojeda  
6 c/o Todd C. Wiley, Esq.  
7 Gallagher & Kennedy, P.A.  
8 2575 East Camelback Road  
9 Phoenix, Arizona 85016-9225

8 Mr. Ojeda is Citizens' District Manager. He is expected to testify regarding  
9 dealings with Mr. Goshia and investigation of Mr. Goshia's complaint in this docket.  
10 Specifically, Mr. Ojeda is expected to testify that Citizens properly applied company tariffs to  
11 Mr. Goshia; that Citizens billings and charges were correct; that Mr. Goshia's complaints are  
12 unsupported; and regarding Mr. Goshia's payment history.

13 4. Irma Martinez  
14 c/o Todd C. Wiley, Esq.  
15 Gallagher & Kennedy, P.A.  
16 2575 East Camelback Road  
17 Phoenix, Arizona 85016-9225

16 Ms. Martinez is a Customer Service Supervisor. She is expected to testify  
17 regarding customer service matters relating to Mr. Goshia and his payment history. She will  
18 testify regarding Mr. Goshia's past due payments and inadequate payment history.

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1 DATED this 30 day of August, 2001.

2 GALLAGHER & KENNEDY, P.A.

3 By T. Wiley  
4 Michael M. Grant  
5 Todd C. Wiley  
6 2575 East Camelback Road  
7 Phoenix, Arizona 85016-9225  
8 Attorneys for Citizens Communications  
9 Company

8 **Original** and ten copies filed this  
9 30 day of August, 2001 with:

9 Docket Control  
10 Arizona Corporation Commission  
11 1200 West Washington  
12 Phoenix, Arizona 85007

12 **Copy** of the foregoing faxed and  
13 mailed this 30 day of August, 2001 to:

14 Jane Rodda (520-628-6559)  
15 Arizona Corporation Commission  
16 400 West Congress Street  
17 Tucson, Arizona 85701-1347

16 **Copies** of the foregoing mailed  
17 this 30 day of August, 2001 to:

18 Christopher Kempley, Esq.  
19 Legal Division  
20 Arizona Corporation Commission  
21 1200 West Washington  
22 Phoenix, Arizona 85007

21 Peter and Patricia Goshia  
22 d/b/a Burro Inn  
23 Post Office Box 4188  
24 76 West El Burro Lane  
Tubac, Arizona 85646

