

Network Essentials, Ltd.
326 S. Cedar Street
Moses Lake, WA 98837
January 29, 2006

Washington Utilities and Transportation Commission

Network Essentials, Ltd (Complainant)

vs

Grant County Public Utility District (Respondent

Docket Number: UT-051602

Objection to Respondent's First Set of Data Requests and request for additional time to respond.

TO: Secretary, Washington Utilities and Transportation Commission

1300 S. Evergreen Park Drive S.W

P.O. Box 472509

Olympia, WA 98504-7250

1. We are in receipt of the Respondent's First Set of Data Requests dated 17 January 2006 which consists of 32 pages of which some 30 ask for detailed information, drawings, documents, emails, etc. Much of this information would only be available by questioning the employees of the Respondent under oath or obtaining from the Respondent drawings and other information which would not normally be available to customers.
2. As we have pointed out in the past, Network Essentials, Ltd. is a small business

located in a rural agricultural are of Washington State without the resources to legal representation. We filed this complaint (docket UT-051602) in the expectation that our predicament would be met with some assistance from State authorities. Such assistance has not been forthcoming so we are forced to undertake this work ourselves in addition to servicing the business clients of Network Essentials, Ltd while we identify and contact agencies which could assist us without creating a financial burden to the Corporation.

3. The amount of information requested by the Respondent amounts to a burdensome and costly imposition on the time of the Complainant. Indeed, much of the “detailed” information requested would only be available from the employees of the District itself; employees who would not normally make themselves available. If the Complainant were to respond fully to this request there would be no further need of the Complaint as Network Essentials, Ltd. would lose further customers and become bankrupt.
4. The Request further demands a response within 10 working days. Given the amount of data included in the request this would be impossible unless the Complainant hires a staff to deal with it. This would impose a financial burden upon the Corporation that would not be survivable.
5. The Request makes no accommodation for identifying documentation which is available from the District's own files and employees and thus would impose the burden of time and expense of making copies of documents which are already available to the Respondent's attorneys.
6. Network Essentials, Ltd. requests that the Respondent's First Set of Data Requests be set aside and that the Respondent be ordered to submit a Data Request that is not

burdensome to the Complainant.

7. Network Essentials, Ltd. also requests 30 days to respond to the new Data Request when it is filed.

Respectfully yours,

Craig R. Jungers, President

Network Essentials, Ltd.