

RAY A. FOIANINI
MICHAEL W. SMITH

FOIANINI LAW OFFICES
ATTORNEYS AT LAW
120 FIRST AVENUE NW / POST OFFICE BOX 908
EPHRATA, WASHINGTON 98823

Msmith1@gcpud.org
PHONE: (509) 754-3591
FAX: (509) 754-5076

February 8, 2006

Dennis J. Moss
Administrative Law Judge
1300 S. Evergreen Park Dr. S.W.
PO Box 47250
Olympia, WA 98504 -7250

RECEIVED
RECORDS MANAGEMENT UNIT
06 FEB -9 AM 9:48
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Report on efforts and progress to informally resolve discovery dispute
Network Essentials, Ltd v. Grant County Public Utility District
Docket No. UT-051602¹

Dear Dennis Moss:

As required by the "Notice Concerning Discovery Practice Pursuant to the Commission's Procedural Rules" served upon the parties in this matter, this letter is a report on efforts to resolve the discovery dispute giving rise to Mr. Jungers' objection filed with the UTC January 30, 2006. Upon reviewing Mr. Jungers' objection, it appeared to me that he misunderstood the scope or level of effort expected of him in responding to the data requests. I called him and worked out a solution by explaining the expected scope of his response

I have since received a limited response to the District's data requests as well as responsive documents. Several answers to the data requests were unresponsive, thus, at this point, I am continuing efforts to resolve disputes or concerns relative to the data requests informally with Mr. Jungers.

Sincerely,



MICHAEL W. SMITH
Attorney for Respondent,
Public Utility District No.2 of Grant County

cc: Craig Jungers
