

BEFORE THE PUBLIC SERVICE COMMISSION OF NORTH DAKOTA

Public Service Commission
Green Way Earth Works LLC
Damage Prevention Enforcement

Case No. PO-15-217

Public Service Commission,
Complainant,

ANSWER

vs.

Green Way Earth Works LLC,
Respondent.

Respondent, by and through its attorney Gregory L. Lange, hereby answers the Complaint of Complainant as follows:

1.

All of the allegations of the Complaint are denied except as they are hereinafter expressly admitted, qualified, or explained.

2.

The allegations of paragraph I are admitted.

3.

Respondent has insufficient information to admit or deny the allegations of paragraphs II, IV, V, VII, and IX and so places Complainant on its burden to prove them.

4.

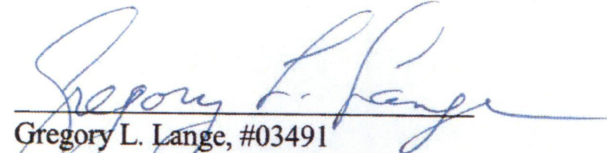
Paragraphs III and X are simply statements of law, and it is the responsibility of the fact finder to determine what law applies.

Prayer for Relief

Based on the foregoing, Respondent asks the Commission to set a hearing on this matter so

that Respondent Green Way might present its defenses and objections to this proceeding.

Dated this 22nd day of March, 2015.



Gregory L. Lange, #03491
Lange Donovan & Kaffar, PLLP
Attorney for the Respondent
P.O. Box 488
Hazen, ND 58545
(701) 748-2206
hazenlaw@westriv.com

ll/Corporate/Green Way/Answer

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Damage Prevention Enforcement)

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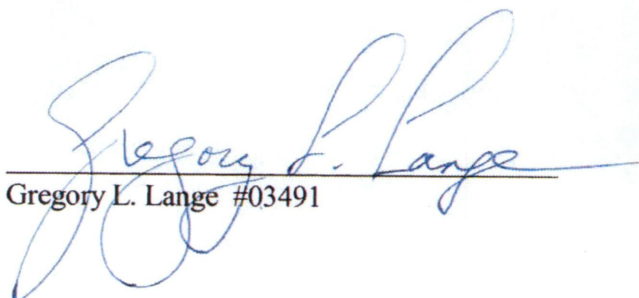
Green Way Earth Works LLC,)

Respondent.)

CERTIFICATE OF SERVICE

This certifies that a true and correct copy of Answer was placed in the U.S. Mail, first class and postage prepaid on this 22nd day of March, 2016, to the following addressed person:

John M. Schuh
Special Assistant Attorney General
600 E. Boulevard Ave – Dept. 408
Bismarck, ND 58505-0480


Gregory L. Lange #03491