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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorneys for Petitioner Eagle Water Customer Group

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE JOINT
APPLICATION OF SUEZ WATER IDAHO
AND EAGLE WATER COMPANY FOR
THE ACQUISITION OF EAGLE WATER
COMPANY

CASE NOS. SUZ-W-18-02
EAG-W-18-01

**EAGLE WATER CUSTOMER GROUP'S
PETITION TO INTERVENE**

COMES NOW, Eagle Water Customer Group (hereinafter "EWCG" or "Customer Group"), through the undersigned counsel of record, pursuant to the Rules of Procedure of the Idaho Public Utilities Commission (hereinafter "RP"), IDAPA 37.01.01.071-075, and *Notice of Application; Notice of Intervention; Order No. 34203* (Dec. 7, 2018) (hereinafter "Notice of Application"), and hereby petitions the Commission for an order granting intervention to EWCG to become a party and participate fully in the matter of the *Joint Application for Approval of Acquisition of Eagle Water Company, Inc. Assets by Suez Water Idaho Inc. and Amendment of Certificate of Public Convenience and Necessity No. 143, Approval of Rates and Charges and Request for Modified Procedure* (hereinafter "Joint Application").

1. The address and name of the Petitioner is:

Eagle Water Customer Group
8770 W. Chaparral Road
Eagle, Idaho 83616

2. EWCG is represented by the below counsel of record and effective immediately, all notices, correspondence, pleadings, filings, or other communications should be directed to the following persons at the address listed below:

Norman M. Semanko
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3. EWCG is an unincorporated nonprofit association, formed and recognized under the laws of the State of Idaho, composed of ratepayers, taxpayers and concerned citizens, including customers of one of the Applicants, Eagle Water Company. EWCG members stand to be impacted by significant rate increases resulting from the proposed acquisition, as set forth in the Joint Application. If granted, these rate increases would exceed 200% for residential customers and 300% for commercial customers, in just three years. Notice of Application at 2; Joint Application at 12-13. This threatens to impose considerable "rate shock" on Eagle Water customers. The outcome of proceedings regarding the Joint Application could also impact service to customers and other aspects of the public interest. EWCG therefore has a direct and substantial interest in the outcome of the Joint Application, as required by RP 74.

4. EWCG seeks intervention as a full party, to participate regarding the issues before the Commission, including those presented by the Joint Application, the direct testimony and exhibits submitted by the Applicants, the Notice of Application, and in written comments submitted to the Commission. Therefore, EWCG's intervention would not unduly broaden the issues, as required by RP 74.

5. A petition to intervene is timely if it is filed by the time provided by order or notice of the Commission. RP 73. The Commission has set an intervention deadline of December 28, 2018. Notice of Application at 3-4. As a result, this petition to intervene is timely.

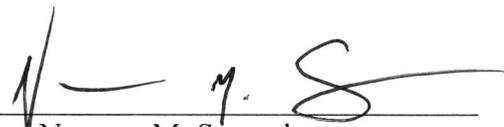
6. EWCG was formed to oppose and respond to the proposed acquisition of Eagle Water Company by Suez, including the proposed rate increases, potential impacts on service, and other aspects of the public interest. The Customer Group's intervention would allow for active participation in all aspects of these proceedings, as necessary to protect the interests of its members. No other party can adequately represent the interests of EWCG. The Customer Group's intervention would not disrupt the proceedings, prejudice the parties, or unduly broaden the issues.

7. In the event intervention is granted, Petitioner EWCG reserves the right to apply for intervenor funding pursuant to RP 161-165.

For the foregoing reasons, EWCG's petition should be granted to allow EWCG to intervene in this matter and fully participate in all aspects of the proceedings regarding the Joint Application filed by Eagle Water Company and Suez.

DATED this 27th day of December, 2018.

PARSONS BEHLE & LATIMER

By: 
Norman M. Semanko

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the following on this 27th day of December, 2018 by the following method:

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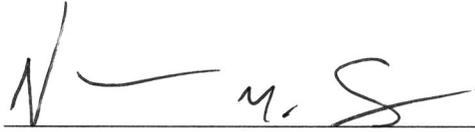
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