

CHARLENE K. QUADE, ISB #6921
HEATHER L. CONDER, ISB #7057
SEAN R. BECK, ISB #7992
LANCE M. POUNDS, ISB # 10028
C.K. QUADE LAW, PLLC
600 E. Riverpark Lane, Suite 215
Boise, Idaho 83706
Telephone: 208-367-0723
Facsimile: 208-639-6400
Email: char@charquadelaw.com
Email: heather@charquadelaw.com
Email: sean@charquadelaw.com
Email: lance@charquadaelaw.com
EService: efileidaho@charquadelaw.com

Attorneys for Petitioner Citizens Allied for Integrity and Accountability

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IDAHO PUBLIC
UTILITIES COMMISSION

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

**CITIZENS ALLIED FOR INTEGRITY
AND ACCOUNTABILITY'S PETITION
TO INTERVENE**

Petitioner Citizens Allied for Integrity and Accountability, a 501(c)3 Corporation, (hereinafter "CAIA") through undersigned counsel of record, C.K. Quade Law, PLLC, 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 CAIA 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:

Citizens Allied for Integrity and Accountability
PO BOX 2622
Eagle, Idaho 83616

2. CAIA 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:

C.K. Quade Law, PLLC
600 E. Riverpark Ln., Ste. 215
Boise, ID 83706
Telephone 208-367-0723
Facsimile 208-39-6400
efileidaho@charquadelaw.com

3. CAIA is a nonprofit 501(c)3 corporation, formed and recognized under the laws of the State of Idaho, and based in the City of Eagle. CAIA is composed of **ratepayers, taxpayers and concerned citizens**, including customers of one of the Applicants, Eagle Water Company. CAIA is a citizen's advocacy group initially formed by Idaho citizens dedicated to protecting the public interest by preserving private property rights, public health, safety and critical natural resources. CAIA's mission is broad enough to include the current Petition, as they have a direct interest in maintaining high quality water resources that adequately support both current users and future development in Eagle by maintaining local control of this most precious, irreplaceable resource and protecting citizens from drastic rate hikes. No other party can adequately represent the interests of CAIA. Intervention by the CAIA would not disrupt the proceedings, prejudice the parties, or unduly broaden the issues.

4. CAIA members stand to be impacted by significant rate increases resulting from the proposed acquisition, as set forth in the Joint Application, and possible environmental harms stemming from the merger. If the acquisition is granted, water rates 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 a substantial financial hardship and a "rate shock" on Eagle Water customers, many of whom are single parents, elderly, or living with disabilities on fixed and limited incomes. The outcome of proceedings regarding the Joint Application could also impact service to customers and other aspects of the public interest, including water quality, chemical treatments, and environmental concerns. CAIA therefore has a direct and substantial interest in the outcome of the Joint Application, as required by RP 74.

5. CAIA 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, CAIA's intervention would not unduly broaden the issues, as required by RP 74.

6. 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.

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

For the foregoing reasons, CAIA's petition should be granted to allow CAIA 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 28th day of December, 2018.

C.K. QUADE LAW, PLLC

By: 

SEAN R. BECK
Attorney for Petitioner CAIA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of December, 2018, a true and correct copy of the foregoing document was served on the following in the manner indicated:

Diane M. Hanian	<input type="checkbox"/> by U.S. Mail
Commission Secretary	<input checked="" type="checkbox"/> by Personal Delivery
Idaho Public Utilities Commission	<input type="checkbox"/> by Facsimile
472 West Washington Street	<input checked="" type="checkbox"/> by E-Mail
Boise, Idaho 83702	
<u>secretary@puc.idaho.gov</u>	
<u>diane.hanian@puc.idaho.gov</u>	
<i>IPUC</i>	

Brandon Karpen	<input type="checkbox"/> by U.S. Mail
Deputy Attorney General	<input type="checkbox"/> by Personal Delivery
Idaho Public Utilities Commission	<input type="checkbox"/> by Facsimile
472 West Washington Street	<input checked="" type="checkbox"/> by E-Mail
Boise, Idaho 83702	
<u>brandon.karpen@puc.idaho.gov</u>	
<i>IPUC</i>	

Michael C. Creamer	<input type="checkbox"/> by U.S. Mail
Givens Pursley LLP	<input type="checkbox"/> by Personal Delivery
601 W. Bannock St.	<input type="checkbox"/> by Facsimile
Boise, Idaho 83702	<input checked="" type="checkbox"/> by E-Mail
<u>mcc@givenspursley.com</u>	
<i>Attorneys for Petitioners</i>	

Marshall Thompson	<input type="checkbox"/> by U.S. Mail
Suez Water Idaho, Inc.	<input type="checkbox"/> by Personal Delivery
8248 W. Victory Rd.	<input type="checkbox"/> by Facsimile
Boise, Idaho 83709	<input checked="" type="checkbox"/> by E-Mail
<u>marshall.thompson@suez.com</u>	
<i>Petitioner</i>	

Robert DeShazo	<input checked="" type="checkbox"/> by U.S. Mail
Eagle Water Company, Inc.	<input type="checkbox"/> by Personal Delivery
188 W. State St.	<input type="checkbox"/> by Facsimile
Eagle, Idaho 83616	<input type="checkbox"/> by E-Mail
<i>Petitioner</i>	

N.L. Bangle
188 W. State St.
Eagle, Idaho 83616
nbangle@h2o-solutionsllc.net
Petitioner

by U.S. Mail
 by Personal Delivery
 by Facsimile
 by E-Mail

Cherese D. McLain
MSBT Law, Chtd.
7699 W. Riverside Drive
Boise, Idaho 83714
cdm@msbtlaw.com
Attorneys for Intervenor City of Eagle

by U.S. Mail
 by Personal Delivery
 by Facsimile
 by E-Mail

Stan Ridgeway, Mayor
City of Eagle
sridgeway@cityofeagle.org
sbergmann@cityofeagle.org
Intervenor City of Eagle

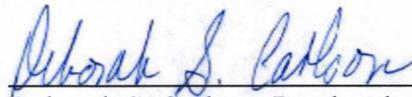
by U.S. Mail
 by Personal Delivery
 by Facsimile
 by E-Mail

Norman M. Semanko
Parsons Behle & Latimer
800 West Main Street, Suite 1300
Boise, Idaho 83702
NSemanko@parsonsbehle.com
ecf@parsonsbehle.com
*Intervenor Eagle Water Customer Group
(EWCG)*

by U.S. Mail
 by Personal Delivery
 by Facsimile
 by E-Mail

Abigail R. Germaine
Deputy City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, Idaho 83701-0500
agermaine@cityofboise.org
Intervenor, City of Boise

by U.S. Mail
 by Personal Delivery
 by Facsimile
 by E-Mail



Deborah S. Carlson, Paralegal
C.K. Quade Law, PLLC