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 Attorney for Petitioner
 Community Action Partnership
 Association of Idaho

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 IDAHO PUBLIC
 UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE JOINT)	CASE NOS. SUZ-W-18-02
APPLICATION OF SUEZ WATER)	EAG-W-18-01
AND EAGLE WATER COMPANY FOR THE)	
ACQUISITION OF EAGLE WATER)	COMMUNITY ACTION
COMPANY)	PARTNERSHIP ASSOCIATION
)	OF IDAHO'S PETITION TO
)	TO INTERVENE
)	

COMES NOW, Community Action Partnership Association of Idaho (hereinafter "CAPAI" or "Intervenor") and, pursuant to Rules 071-076 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-076, hereby petitions the Commission for leave to intervene in this proceeding and to appear and participate with full party's rights. In support of this Petition, CAPAI states as follows:

1. The address and name of the Petitioner is:

Community Action Partnership Association of Idaho
 3350 W. Americana Terrace, Suite 360
 Boise, ID. 83706

2. CAPAI will be represented in this proceeding by, and pleadings and other correspondence need only be sent to:

Brad M. Purdy
Attorney at Law
2019 N. 17th St.
Boise, ID. 83702
208-384-1299
Email: bmpurdy@hotmail.com

3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Community Council of Idaho and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty are numerous and disparate and include increasing utility rates such as those for SUEZ's low income rate payers.

Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. CAPAI is typically the only party who intervenes in proceedings before the Commission specifically representing public utilities' low-income customers. In particular, CAPAI has been involved. Over the years, in a considerable number of SUEZ proceedings before this Commission. CAPAI staff works with SUEZ on a regular basis for many reasons to address a wide variety of issues ranging from rate design and revenue requirement to low income programs. If granted intervention in this case, CAPAI will address a variety of issues of importance to the general body of ratepayers.

The case at hand is somewhat unique and certainly significant for all of SUEZ's and EAGLE WATER's ratepayers, including low income. The acquisition, labeled an "Asset Purchase Agreement," involves a 3-party transaction whereby Eagle Water will transfer, for a price unknown, all of Eagle Water's interests in the Company's assets to an entity known as "H2O Eagle." H2O Eagle will then transfer all interests in the former Eagle Water assets to Suez

for a stated compensation of ten million dollars (\$10,000,000). Though the proposed transaction is somewhat unique, it essentially involves increasing the water rates, in three steps, up to parity with Suez's existing rates. The joint Applicants contend that Eagle's existing water system infrastructure is in immediate need of significant upgrade which will require a considerable investment regardless of whether the transaction is approved. On the other hand, the Applicants assert that there will be economic and system benefits resulting from the proximity of existing Suez water facilities which will aid in reducing the necessary costs of the Eagle system upgrades.

The proposed acquisition will have obvious impacts on the rates and quality of Eagle Water's system and service. Due to Eagle Water's alleged shortcomings in its bookkeeping, obvious scrutiny will be needed to ensure the overall fairness of the transaction to both existing Suez and Eagle Water customers. CAPAI is concerned that all customers are treated fairly and that the transaction will not be disproportionately burdensome to all low income customers affected.

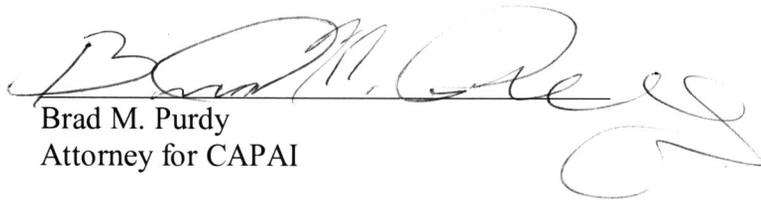
CAPAI points out that Suez, and its predecessors, established a form of low-income assistance and that this transaction presents an opportune time to re-examine that assistance to safeguard the interests of the poor. CAPAI intends to examine these issues and circumstances and, as the primary low income advocate appearing before this Commission, is in a favorable position to provide educated input regarding low income interests and the interests of the majority of joint applicant's ratepayers.

Based on the foregoing, CAPAI believes that it would fulfill an important role in this proceeding if given the opportunity to participate as a party. Consequently, CAPAI respectfully submits that it has a direct and substantial interest in the subject matter of this proceeding and its intervention will not unduly broaden the scope of the issues presented by the Application.

4. CAPAI respectfully requests the right to participate in this proceeding and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument, file comments, and otherwise fully participate as a party.

WHEREFORE, the Community Action Partnership Association of Idaho hereby requests that the Commission grant this Petition to Intervene in this proceeding and to fully appear and participate as a party with all the rights and responsibilities as such.

DATED, this 28th day of December, 2018.



Brad M. Purdy
Attorney for CAPAI

CERTIFICATE OF SERVICE

I, the undersigned, hereby represent that on this 28th day of December, 2018, caused a true and correct copy of this Petition to Intervene to be served on the following electronically (unless otherwise indicated).

Diane Hanian, Secretary
Idaho Public Utilities Commission
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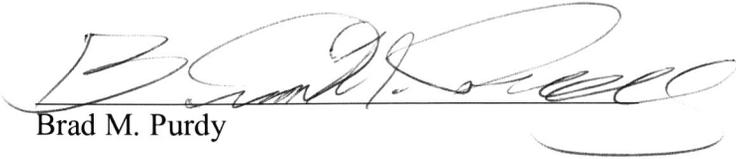
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Eagle, ID 83616

Mr. N.L. Bangle
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DATED, this 28th day of December, 2018,



Brad M. Purdy