

Brad M. Purdy
Attorney at Law
Bar No. 3472
2019 N. 17th St.
Boise, ID. 83702
(208) 384-1299 (Land)
(208) 484-9980 (Cell)
bmpurdy@hotmail.com
Attorney for Petitioner
Community Action Partnership
Association of Idaho

RECEIVED
2020 NOV 12 AM 8:53
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF SUEZ WATER IDAHO)	CASE NO. SUZ-W-20-02
INC.'S APPLICATION FOR AUTHORITY)	
TO INCREASE ITS RATES AND CHARGES)	
FOR WATER SERVICE IN IDAHO)	COMMUNITY ACTION
PRUDENTLY INCURRED.)	PARTNERSHIP ASSOCIATION
)	OF IDAHO'S PETITION
)	TO INTERVENE
)	

COMES NOW, Community Action Partnership Association of Idaho ("CAPAI") and, pursuant to Rules 071-076 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-076, as well as Order No. 34819 issued October 21, 2020, 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 (Land)
208-484-9980 (Cell)
bmpurdy@hotmail.com

3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and include Suez's service territory. CAPAI's mission is to fight the causes and conditions of poverty through building the capacity and effectiveness of its member agencies who have a direct and substantial interest in this proceeding. These causes and conditions of poverty are numerous and disparate and include the cost of utility services.

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. CAPAI has been involved over many years in a considerable number of proceedings before this Commission, some including Suez and its predecessor companies operating under prior names.

Given the magnitude of the rate increase sought by Suez, as well as possible rate design issues, and the potential that existing low income customers might effectively be effectively subsidizing the costs associated with of growth in one of the nation's metropolitan areas experiencing record growth, is of considerable concern to low income customers, CAPAI believes that it will 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 issues presented by Suez's Application.

4. CAPAI respectfully requests the right to fully participate in this proceeding as a party.

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

DATED, this 11th day of November, 2020.


Brad M. Purdy

CERTIFICATE OF SERVICE

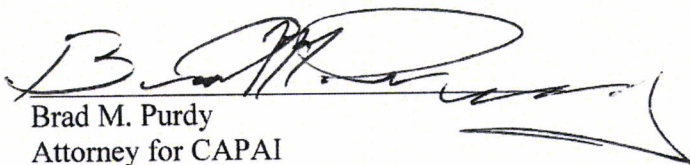
I hereby certify that on this 11th day of November, 2020, I served true and correct copies of the foregoing document to those individuals listed below via electronic delivery:

Diane Hanian
Secretary
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702
Diane.hanian@puc.idaho.gov

Lisa D. Nordstrom
Idaho Power Company
P.O. Box 70
Boise, ID 83707-0070
lnordstrom@idahopower.com
dockets@idahopower.com

Connie Aschenbrenner
Idaho Power Company
P.O. Box 70
Boise, ID 83707-0070
caschenbrenner@idahopower.com

Peter J. Richardson
Industrial Customers of Idaho Power
c/o Peter J. Richardson
Richardson Adams, PLLC
515 N. 27th St
P.O. Box 7218
Boise, Idaho 83702
peter@richardsonadams.com


Brad M. Purdy
Attorney for CAPAI