

STEVEN J. MEADE
225 N. 9th Street, Suite 820
P.O. Box 1097
Boise, ID 83701
Telephone (208)331-1170
Facsimile (208)331-1529
smeade@idalaw.com

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IDAHO PUBLIC
UTILITIES COMMISSION

Authorized Representatives of Atlanta Water Association, Inc.
and Atlanta Landowner's Association, Pro SE

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

MARY DRAKE,

Complainant,

vs.

ATLANTA POWER COMPANY,

Respondent.

Case No. ATL-E-18-01

**PETITION TO INTERVENE OF
ATLANTA WATER ASSOCIATION,
INC. AND ATLANTA
LANDOWNER'S ASSOCIATION**

COME NOW, the Atlanta Water Association, Inc. ("AWA") and the Atlanta Landowner's Association ("ALA"), hereinafter referred to "Intervenors," and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA 31.01.01.71 hereby petition the Commission for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of Intervenors are:

Atlanta Water Association, Inc.
c/o Steven J. Meade
225 N. 9th Street, Suite 820
P.O. Box 1097
Boise, ID 83701
Telephone (208)331-1170
Facsimile (208)331-1529
smeade@idalaw.com

Atlanta Landowner's Association
c/o Steven J. Meade
225 N. 9th Street, Suite 820
P.O. Box 1097
Boise, ID 83701
Telephone (208)331-1170
Facsimile (208)331-1529
smeade@idalaw.com

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Steven J. Meade as noted above, with an electronic copy to:

Board Members of the AWA:

theamyobrien@gmail.com;
dvance.awa@gmail.com;
rickandevyjenkins@gmail.com;
jpdeb@rtci.net

Board Members of the ALA:

bygreylock@wildblue.net;
andy.epperson@gmail.com;
matt@boiseinfill.com;
jgilles@cableone.net;

Atlanta Land Owner:

steve@pumpkincreekcranch.com

2. The Intervenor, Atlanta Water Association, Inc. (“AWA”) is a community water system that serves the community of Atlanta. AWA membership consists of landowner’s in Atlanta, Idaho that receive potable water from the AWA. The AWA is regulated by the State of Idaho Department of Environmental Quality. The AWA has been recognized by the Internal Revenue Service as a 501(c)12 exempt organization. The AWA is NOT a customer of Atlanta Power Company (“APC”) however, many of its’ members receive electric services from APC. In addition, APC, through the Ray family, has contacted AWA and inquired if it would desire to purchase APC. Purchase terms have been discussed, however, APC has provided no financial information to determine if purchasing APC is feasible. Moreover, Linda Churches, even after being requested to do so, has refused to provide any financial information regarding APC until she directed to do so by either by the PUC or an authorized representative of APC.

3. The Intervenor, the Atlanta Landowner's Association (ALA) is a Not a customer of APC however, many of its' members and receive electric services from APC. ALA membership consists of landowner's in Atlanta, Idaho that receive electrical services from the APC or will seek to receive electrical services sometime in the future.

4. Both Intervenors are seeking through their respective memberships to form a cooperative to purchase APC. Funding has been researched and is available through USDA Rural to purchase APC. However, the amount and terms of such funding are impossible to contemplate with ALA and AWA members or USDA Rural without financial information from APC. Again, Linda Churches, even after being requested to do so, has refused to provide any financial information regarding APC until she directed to do so by either by the PUC or an authorized representative of APC.

5. The Intervenors intend to participate herein as parties, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which the Intervenors will introduce is dependent upon the nature and effect of other evidence in this proceeding.

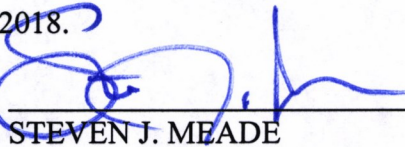
6. Without the opportunity to intervene herein, the Intervenors would be without any means of participation in this proceeding which may have material impact on electric rates and the terms and conditions of such service, and the future ownership of APC.

7. Granting the Intervenors' petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

WHEREFORE, the Atlanta Water Association, Inc. and the Atlanta Landowner's Association respectfully request this Commission grant their Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and

to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED This 10th day of April, 2018.



STEVEN J. MEADE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of April, 2018, a true and correct copy of the above and foregoing document was forwarded addressed as follows in the manner stated below:

Diane Hanian (H, E)
Commission Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID 83702
Diane.holt@puc.idaho.gov
Diane.hanian@puc.idaho.gov

Hand Delivered
U.S. Mail
Fax
Email/E-Service

Mary Drake
72 E. Pine
Atlanta, ID 83716
Flute.md@gmail.com

Hand Delivered
U.S. Mail
Fax
Email/E-Service

Linda Churches
Atlanta Power Co.
P.O. Box 672
Salmon, ID 83467

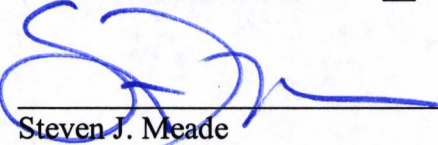
Hand Delivered
U.S. Mail
Fax
Email/E-Service

Israel Ray, Treasurer
Atlanta Power Company
11140 Chicken Dinner Road
Caldwell, ID 83607

Hand Delivered
U.S. Mail
Fax
Email/E-Service

Israel Ray, Treasurer
Atlanta Power Company
16589 Wagner Road
Caldwell, ID 83607

Hand Delivered
U.S. Mail
Fax
Email/E-Service



Steven J. Meade