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

BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION		
MARY DRAKE, Complainant, vs.	Case No. ATL-E-18-01 STATEMENT OF POSITION OF INTERVENOR STEVEN J. MEADE	
ATLANTA POWER COMPANY, Respondent.		
STATE OF IDAHO) :SS. County of Ada)	m on ooth donooo and oour	

STEVEN J. MEADE, being first duly sworn on oath, deposes and says:

- 1. I am over the age of eighteen and make this affidavit based upon my own personal knowledge.
 - 2. I am aware of the order issued by the PUC on April 2, 2019.
- I am also aware of the request for reconsideration filed by Israel Ray on April 24, 3. 2019.
- 4. In response to the Request for Reconsideration, it is true that the Atlanta Electrical Consumer Co-Op, Inc. (hereinafter "Co-Op") board has been contacted by Gene Ray and Israel Ray about selling Atlanta Power to the Co-Op.

STATEMENT OF POSITION OF INTERVENOR STEVEN J. MEADE - 1

- 5. Discussions are taking place regarding the appraisal of Atlanta Power for the purposes of a sale. For example, whom should prepare the appraisal, and how the cost should be shared between the parties. However, theses details have yet to be finalized.
- 6. Co-op has yet to receive any financial documents from Atlanta Power, however, it appears that Atlanta Power is working to provide the Co-op with some documents.
- 7. In order for a sale to be consummated it would be beneficial and necessary for the Co-op to be provided with annual verified returns showing Atlanta Powers' gross operating revenues for 2016, 2017 and 2018.
- 8. I would request that Atlanta Power be required to provide the IPUC with its gross operating revenues for 2016, 2017 and 2018 as required by statute in the next 30 days.
- 9. If the sale were to be consummated, it would <u>not</u> be beneficial for the Co-op to have inherit a debt of \$12,000.00 due and owing to the IPUC for Atlanta Power's failure to comply with its statutory obligations.
- 10. If the sale were to be consummated, it would <u>not</u> be beneficial for the Co-op to have to inherit any penalties associated with the debt of \$12,000.00 currently due and owing to the IPUC or any other penalties that may be imposed upon the Co-op for Atlanta Power's failure to comply with its statutory obligations.
- 11. Therefore, I would urge the IPUC to suspend this matter for a period of six months while the Co-op and Atlanta Power work out the terms of a sale.
- 12. I would also urge the IPUC to suspend consideration of the imposition of fines and any penalties associated with the fines and/or Atlanta Powers failure to comply with the statutory requirements, for a period of six months while the Co-op and Atlanta Power work out the terms of a sale

13. If sale cannot be accomplished within six months, I would either request an extension of time from the IPUC for good cause shown, or inform the IPUC that there will be no sale.

FURTHER YOUR AFFIANT SAYETH NOT.

DATED This 29 day of April, 2019.

STEVEN J. MEAD

STATE OF IDAHO) :ss.
County of Ada)

On this 29 day of price, 2019, before me, the undersigned notary public in and for said State, personally appeared STEVEN J. MEADE, known to me to be the person whose name is subscribed to the within and foregoing instrument, and acknowledged to me that he executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year first above written.

KASEE SERRANO COMMISSION #28784 NOTARY PUBLIC STATE OF IDAHO

NOTARY PUBLIC for Idaho

Residing at Borse

Commission expires: 61-20-2027

KASEE SERRAND COMMISSION (2078) NOTARY FUDIJIC STATE OF IDAHO

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day of April, 2019, 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 ven J. Meade	