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Attorneys for SUEZ Water Idaho Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF DEFERRED
ACCOUNTING OF INCREMENTAL
COSTS ASSOCIATED WITH THE
COVID-19 PUBLIC HEALTH
EMERGENCY

**Case No. GNR-U-20-03 (including
Consolidated Case Nos. AVU-E-20-03;
AVU-G-20-03; FLS-W-20-02; GSW-
W-20-01; IPC-E-20-19; and PAC-E-
20-04)**

SUEZ WATER IDAHO INC.'S COMMENTS

Pursuant to Order No. 34643, SUEZ Water Idaho Inc. ("SUEZ") submits the following comments regarding Case No. GNR-U-20-03:

1. SUEZ is a regulated water utility in Idaho subject to the jurisdiction of the Idaho Public Utilities Commission.
2. Like the other utilities already participating in Case No. GNR-U-20-30, SUEZ anticipates increased expenses resulting from the COVID-19 emergency, which may include bad debt expenses, waived fees, and other costs and expenses that cannot be predicted with accuracy at this time.
3. The applications consolidated by Order No. 34643 request authorization to account for unanticipated, COVID-19-related expenses by booking them as regulatory assets for possible recovery through rates that would be set in future proceedings. The requested deferrals

do not seek to increase rates at this time. Order No. 34643 further provides that any utility that “submit[s] timely comments in the case requesting deferred accounting treatment [will] be eligible for any deferred accounting treatment authorized by the final order in this case.” Order No. 34643 at 2. The Order also specifies that such comments must be submitted within 21 days of its service date, which is April 23, 2020. *Id.* at 3.

4. SUEZ hereby respectfully requests that Emergency-related deferred accounting authority for SUEZ be decided in the generic case and it be allowed to defer accounting treatment of COVID-19 related expenses consistent with any final order in this case.

5. SUEZ understands that the case will proceed by modified procedure unless the Commission orders otherwise, and stands ready for the case to proceed as ordered.

6. Please direct all communications and service of pleadings in this matter to:

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and

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DATED: May 5, 2020.

GIVENS PURSLEY LLP

A handwritten signature in blue ink, appearing to read "P. N. Carter", is positioned above a horizontal line.

Michael C. Creamer
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Attorneys for SUEZ Water Idaho Inc.

CERTIFICATE OF SERVICE

I certify that on May 5, 2020, a true and correct copy of **SUEZ WATER IDAHO INC.'S COMMENTS** was served upon all parties of record in this proceeding via the manner indicated below:

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