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IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorneys for Gem State Water Company, LLC*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE  
APPLICATION OF GEM STATE  
WATER COMPANY, LLC FOR  
APPROVAL OF ACQUISITION OF  
THE ASSETS OF THE WATER  
BUSINESS OF HAPPY VALLEY  
WATER SYSTEM INC. AND  
BITTERROOT WATER CO., INC.

**Case No. GSW-W-19-01**

GEM STATE WATER COMPANY, LLC'S  
REPLY COMMENTS

Gem State Water Company, LLC (“Gem State Water” or “Company”) files the following response to comments filed by the Commission Staff on February 19, 2020 (“Staff Comments”).

Gem State Water appreciates Staff’s review of the proposed acquisition and the Staff Comments. As Staff noted, Idaho Department of Environmental Quality (“IDEQ”) provided a system disapproval letter in April 2019 regarding the Bitterroot system, as well as follow-up correspondence throughout 2019. Gem State Water is aware of these issues and is working with IDEQ to provide the required information. Gem State Water is confident that it will promptly address IDEQ’s concerns, and appreciates the Staff’s conclusion that these issues should not affect the acquisition.

Gem State Water looks forward to effectuating the transaction pursuant to the Asset Purchase Agreement, and to further expanding its presence in Northern Idaho.

DATED: February 26, 2020.

GIVENS PURSLEY LLP



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Preston N. Carter

Charlie S. Baser

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*Attorneys for Gem State Water Company, LLC*

## CERTIFICATE OF SERVICE

I certify that on February 26, 2020, a true and correct copy of Gem State Water Company's Reply Comments was served upon all parties of record in this proceeding via the manner indicated below:

### **Commission Staff**

Diane Hanian, Commission Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd., Bldg. 8, Ste. 201-A  
Boise, ID 83714  
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### **Hand Delivery & Electronic Mail**

(Original and 7 copies)

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