From: Timothy Eck <timothyeck@me.com> To: Jan Noriyuki Subject: CIAC Opposition Date: Thursday, September 10, 2020 8:45:18 PM Attachments: Suez CIAC Letter 9.2.2020.pdf.pdf

September 9, 2020

Commission Secretary Idaho Public Utilities Commission P.O. Box 83720 Boise, ID 83720-0074 jan.noriyuki@puc.idaho.gov

## Re: SUZ-W-20-01

Dear PUC Commissioners:

I am submitting these comments in opposition to the Contributions in Aid of Construction or CIAC.

When I learned about a new fee being charged by Suez and authorized by the Idaho Public Utilities Commission (Contributions in Aid of Construction or

- Contributions in Aid of Construction which is an additional 21.5% to the cost of the water system.
- The cost would increase the price of each home over \$2,500 per home.
- The new CIAC fee creates a distinct competitive disadvantage to private systems. Since the CIAC charges only apply to private water systems, the increased costs are inequitably charged to new development depending on its water provider.
- If a new development is served by a private water system like SUEZ, the CIAC is charged; but the fee is not charged if the development is served by a government owned water system.

Thank you for taking our comments into consideration.

Sincerely,

In The

From:Mark <Mark@nampapaving.com>To:Jan NoriyukiSubject:SUZ-W-20-1Date:Friday, September 11, 2020 7:20:10 AMAttachments:SKM C30820091107230.pdf

September 9, 2020

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Thank you for taking our comments into consideration.

Sincerely,

Mark Owens

Nampa, ID 83687 Bus 208-466-4051 Fax 208-466-4071

Mobile 208-606-6270 mark@nampapaving.com

From:Bodie Brownlee <Bodie@nampapaving.com>To:Jan NoriyukiSubject:Opposition to the CIACDate:Friday, September 11, 2020 7:30:26 AMAttachment:SKM C30820091107300.pdf

September 9, 2020

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Thank you for taking our comments into consideration.

Sincerely,

**Bodie Brownlee** 

From:lee centers <8881852@gmail.com>To:Jan NoriyukiSubject:suezDate:Friday, September 11, 2020 7:47:09 AMAttachments:img20200910 14022138 (2) (1).pdf

September 9, 2020

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https://docs.google.com/document/d/1NcT2LiymYiQUUQTcTxcp0fTzpqfcK0Ylg-OLLyx\_YGw/edit?usp=sharing

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Sincerely,

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LC Dev Inc Lee Centers President



September 9, 2020

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Thank you for taking our comments into consideration.

Sincerely, ale Cryl.

Ronda Conger Vice President CBH Homes

## **BRIGHTON**

September 9, 2020

Commission Secretary Idaho Public Utilities Commission PO Box 83720 Boise, ID 83720-0074

## RE: SUZ-W-20-01

Dear Commissioners:

On behalf of Brighton Development, Inc., ("Brighton"), we are submitting a letter in opposition of the Contributions in Aid of Construction (CIAC) that Suez charges, as authorized by the Idaho Public Utilities Commission, and ask that it be eliminated.

In 2018 the CIAC was adopted by the IPUC at the request of SUEZ without providing sufficient, if any, notice to the impacted communities. The CIAC is a 21.5% tax on private water systems, that came as a complete surprise, and is not required when the utility is owned by a municipality or water district. Brighton was completely blindsided by the adopted CIAC. At the time this became an unbudgeted line item that we were forced to accept.

Brighton had one project with SUEZ approved plans, but we were not provided a contract until after the CIAC had been adopted by PUC. Again, we had no advance warning of the CIAC tax, and were required to pay to keep our project moving forward. For Brighton, the cost has been significant with no offsetting benefit. Specifically, since the CIAC was implemented, we have averaged:

- Eagle, Idaho: \$935 per lot with the highest so far at \$1,490 per lot
- North Ada County, Idaho: \$992 per lot with the highest so far at \$1,410 per lot.

The CIAC tax only applies to private systems and is punitive to projects that are required to use SUEZ because of designated service boundaries. There is no benefit for an unfair and inequitable tax to be charged when a private service provide is required.

We respectfully request that IPUC rescind and eliminate the CIAC tax.

Sincerely,

Brighton Development, Inc.

Jonathan D. Wardle President

## **Cartwright Ranch, LLC**

September 11, 2020

Idaho Public Utilities Commission Commission Secretary P.O. Box 8370 Boise, ID 83720-0074

Re: Case Number SUZ-W-20-01

To Whom it May Concern:

I am writing this letter on behalf of Cartwright Ranch, LLC to support the removal of the CIAC tax currently being charged by Suez Water. Cartwright Ranch is a Planned Community of over 600 homes located in Ada County off Cartwright Road and Hidden Springs Drive. With current demand for housing in Ada County the 21.56% CIAC tax is cumbersome to say the least and prevents the ability to provide an affordable development to the residents. This tax substantially increases development costs which are passed along to future homeowners. This tax places an undue burden on developers, home builders and ultimately residents of Ada County residents who are served by Suez. No other local utility provider charges this burdensome tax. Eliminating the tax will help to keep costs more consistent regardless if the water system is owned by a private company or public utility and will help make housing more affordable.

We would strongly urge the Utilities Commission to approve the Suez application and remove the additional tax. This would not only help the housing market and development community but would ultimately help the current residents of Ada County by decreasing the overall cost of development.

If you should have any questions, please feel free to contact me at 208-938-4270

Regards,

e Carlin

Charles Carlise Cartwright Ranch, LLC

435 E. Shore Drive, Suite #120, Eagle, ID 8316