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IDAHO PUBLIC  
UTILITIES COMMISSION

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Attorneys for Intervenor Ada County

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF APPLICATION OF SUEZ  
WATER IDAHO INC. FOR AUTHORITY TO  
INCREASE ITS RATES AND CHARGES FOR  
WATER SERVICE IN THE STATE OF IDAHO

Case No. SUZ-W-20-02

**ADA COUNTY'S PETITION  
FOR LEAVE TO INTERVENE**

COMES NOW, Ada County, pursuant to Rules 72 through 73 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.72-73), and pursuant to that Application filed on September 30, 2020, and Notice of Application, Suspension of Proposed Effective Date and Notice of Intervention Deadline, Order No. 34819 filed on October 21, 2020, hereby petitions the Commission for leave to intervene herein and to appear and participate as a party, and as basis therefore states as follows:

1. The name and address of this Intervenor is:

Ada County  
200 W. Front Street  
Boise, ID 83702

2. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Lorna Jorgensen and John Cortabitarte at:

Ada County Prosecuting Attorney's Office  
Civil Division  
200 W. Front Street, Room 3191  
Boise, ID 83702  
Telephone: (208) 287-7700  
Facsimile: (208) 287-7719  
Email: [civilpfiles@adaweb.net](mailto:civilpfiles@adaweb.net)

In the interest of reducing costs to all parties, please provide hard copies of pleading, testimony, and briefs only. All other production requests, response, notices, Commission orders and other filings may be submitted via electronic mail in accordance with Rule 63 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.063).

3. Ada County is a duly formed and existing county pursuant to the laws and Constitution of the State of Idaho.

4. Ada County has a direct and substantial interest in this matter as Ada County owns and operates a number of buildings in Ada County which depend on Suez water. As stewards of taxpayers' dollars, Ada County has an obligation to ensure that rates the County is paying for the water are fair and equitable. Ada County also has a strong interest in ensuring that growth pays for itself, that the citizens of Ada County are not subsidizing growth through increased rates, that salaries and benefits of Suez employees are not excessive in comparison to the salaries and benefits of ratepayers, and that ratepayers are not responsible for the company's bad debt. The outcome of this proceeding potentially affects the ability of Ada County and average citizens to pay for water, a critical public asset.

5. Without the opportunity to intervene herein, Ada County would be without any means of participation in this proceeding which may have a negative impact the ability of Ada

County citizens to have access to affordable water offered by Suez Water Idaho Inc. If allowed to intervene, Ada County will provide written comments and otherwise fully participate in these proceedings. In addition, should it be necessary, Ada County will appear in all matters as may be required and appropriate; present evidence; call and examine witnesses; and present argument.

6. Granting Ada County's petition to intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

7. Ada County intends to fully participate in this matter as a party. The nature and quality of Ada County's intervention in this proceeding is dependent upon the nature and effect of other evidence in this proceeding. Ada County requests that the Commission issue a timely order granting or denying this Petition for Leave to Intervene following the seven-day opposition period set forth in IDAPA 31.01.01.075. Ada County also reserves its right to file for intervenor funding, depending upon the amount of time and resources involved in this matter pursuant to IDAPA 31-01.01.161-165.

WHEREFORE, Ada County, respectfully requests that this Commission grant this Petition for Leave to Intervene.

DATED this 6<sup>th</sup> day of November, 2020.

**JAN M. BENNETTS**  
Ada County Prosecuting Attorney

By: /s/ Lorna K. Jorgensen  
Lorna K. Jorgensen  
Deputy Prosecuting Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6<sup>th</sup> day of November 2020, I served the foregoing documents on all parties as follows:

Michael C. Creamer  
Preston N. Carter  
SUEZ Water Idaho Inc.  
Givens Pursley LLP  
601 W. Bannock St.  
Boise, Idaho 83702

[mcc@givenspursley.com](mailto:mcc@givenspursley.com)  
[prestoncarter@givenspursley.com](mailto:prestoncarter@givenspursley.com)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: \_\_\_\_\_

Jan Noriyuki  
Commission Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd., Bldg. 8, Ste. 201A  
Boise, ID 83714

[secretary@puc.idaho.gov](mailto:secretary@puc.idaho.gov)

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David Njuguna  
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By: /s/ Shelby Hannah  
Shelby Hannah  
Legal Assistant