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*Attorney for Boise City*

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

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

Case No. SUZ-W-20-02

**CITY OF BOISE CITY'S  
PETITION FOR LEAVE TO  
INTERVENE**

COMES NOW, the city of Boise City, herein referred to as "Boise City" and pursuant to Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.71 – 31.01.01.73) and, pursuant to that SUEZ Water Idaho Inc. Application for Authority to Increase its Rates and Charges for Water Service in Idaho, and Notice of Application filed on October 21, 2020; and Notice of Application, Suspension of Proposed Effective Date, 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 Boise City is:

City of Boise City  
150 N. Capitol Blvd.  
P.O. Box 500  
Boise, ID 83701-0500

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IDAHO PUBLIC  
UTILITIES COMMISSION

2. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Abigail R. Germaine at:

Abigail R. Germaine  
Deputy City Attorney  
BOISE CITY ATTORNEY'S OFFICE  
150 N. Capitol Blvd.  
P.O. Box 500  
Boise, Idaho 83701-0500  
Telephone: (208) 608-7950  
Facsimile: (208) 384-4454  
Idaho State Bar No. 9231  
Email: [agermaine@cityofboise.org](mailto:agermaine@cityofboise.org)

3. Boise City is a Municipal Corporation organized under the laws of the state of Idaho.

4. Boise City has a direct and substantial interest in this matter as it represents the citizens of Boise City who are served by Suez Water Idaho Inc. (the "Company"), as well as being a customer of the Company itself. Boise City has three hundred twenty (320) municipal operations Suez accounts and spends roughly five hundred thousand dollars (\$500,000.00) for potable water within Boise City municipal facilities annually. The Company is proposing a twenty-two, point three, percent (22.3%) rate increase. This large rate increase will have a dramatic effect on rate payers all across the community.

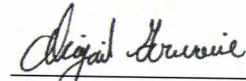
5. Without the opportunity to intervene herein, Boise City would be without any means of participation in this proceeding which may have a material impact on the rates paid by Boise City citizens and Boise City itself. If allowed to intervene, Boise City will participate in the proceedings and appear in all matters as may be necessary and appropriate; present evidence; call and examine witnesses; present argument; and otherwise fully participate in these proceedings.

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

7. Boise City intends to fully participate in this matter as a party. The nature and quality of Boise City's intervention in this proceeding is dependent upon the nature and effect of other evidence in this proceeding. Boise City requests that the Commission issue a timely order granting this Petition for Leave to Intervene following the seven-day opposition period set forth in IDAPA 31.01.01.075. Boise City 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, Boise City, respectfully requests that this Commission grant this Petition for Leave to Intervene.

DATED this 10th day of November 2020.



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Abigail R. Germaine  
Deputy City Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 10<sup>th</sup> day of November 2020, served the foregoing documents on all parties of counsel as follows:

Jan Noriyuki  
Commission Secretary  
Idaho Public Utilities Commission  
11331 West Chinden Boulevard  
Building 8, Suite 201-A  
PO Box 83720  
Boise, ID 83720  
[jan.noriyuki@puc.idaho.gov](mailto:jan.noriyuki@puc.idaho.gov)

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David Njuguna  
Suez Water Management & Services  
461 From Road, Suite 400  
Paramus, NJ 07052  
[David.njuguna@suez.com](mailto:David.njuguna@suez.com)

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*Attorneys for Suez Water Idaho, Inc.*

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- Other: \_\_\_\_\_

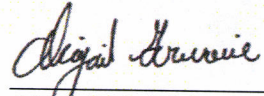
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Lorna Jorgensen  
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[civilpfiles@adaweb.net](mailto:civilpfiles@adaweb.net)  
*Attorneys for Ada County*



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Abigail R. Germaine  
Deputy City Attorney