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IDAHO PUBLIC UTILITIES COMMISSION

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Attorney for Intervenors

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
SUEZ WATER INC'S APPPLICATION FOR)	
AUTHORITY TO INCREASE ITS RATES)	
AND CHARGES FOR WATER SERVICE IN)	
IDAHO)	CASE NO. SUZ-W-20-02
)	
)	PETITION TO INTERVENE
_____)	

The Petitioners named below, hereinafter referred to as "Intervenors" hereby petition the Commission to intervene and to participate as a party pursuant to the Commission Rules of Procedure, IDAPA 31.01.01.071-073 and the Notice of Right to Intervene issued on October 21, 2020.

1. Petitioners Interest

Petitioners are presently users of drinking water systems provided by Suez which is subject to regulation by this Commission. Petitioners will be directly affected by any Commission action taken regarding the rates for such drinking water that are set by this Commission.

2. Issues of Concern

Petitioners have a unique and identifiable interest in this proposed rate increase in that the service they have received and are receiving is substandard and include delivery from time to time of rusty brown colored water which is unsatisfactory for drinking and washing. Thus, there should be no rate increase until these issues have been addressed, and in fact there should be a rate decrease for petitioners and persons living in the affected area. Petitioners have the following specific concerns:

1. Suez has been honest and responsive in identifying the need for significant rehabilitation and improvements in the aging, rusting system in older Boise neighborhoods. Employees have been sympathetic and courteous. Neighbors generally have no problem with customer relations but Suez personnel have a huge problem that must be dealt with by Company administrators: The system is failing and needs expensive investment. Unfortunately, the problems continue after almost 2 years of meetings and many years of complaints. The first meeting took place in early February 2019.
2. Intervenors propose to present evidence to support the deteriorating system. For example the KBOI television news story attached as Exhibit 1 discusses a major problem identified by Suez to be a malfunctioning well on Taggart Street. This well was supposed to be fixed by the "end of 2020" as per Exhibit 1, but this has not happened. Intervenors will advocate that a firm, unalterable time to perform this repair be a part of any decision and that until such repair is made rates for the affected residents should not be increased, but instead should be reduced and that reduction should be reimbursed for the last 2

years. Intervenors wish to discuss other repairs that are needed. The bottom line is that there must be a plan before a rate increase is justified.

3. Intervenors wish to present evidence of the poorly functioning system which justifies their position that a rate reduction is more appropriate than a rate increase.

A. For example, John Gannon is a longtime resident of the area and can present evidence of how the unpredictable occasional appearance of the brown water is disruptive and how it stains the bathtub area. As a legislator for the area, Gannon regularly hears concerns and problems that occur and has regularly attended meetings regarding the issue.

B. For example, Stephanie Montero resides in the Shoshone Street area near the New York Canal which is reputedly served by the Taggart Well and she will present videos she made of flushing and the tremendous amount of material that was flushed, what she was told, and the costs she has incurred. She believes a rate reduction is justified, if anything.

C. For example, Intervenor Kyme Graziano resides near Roosevelt and Emerald Street in a different area reputedly served by a different well and she is very familiar with the brown water issues in her neighborhood, expenses for filters and problems that the substandard water creates for her home. She believes a rate reduction is required, if anything.

D. For example, Intervenor Karoline Philip has lived in the area for many years and she will explain how the system has deteriorated and the expenses she has for water filters.

E. Intervenors propose to call other residents who will present evidence regarding the expense for filtering systems, bottled water and damage to household items as well as being interrupted and inconvenienced when brown water suddenly appears. A rate reduction, not a rate increase should occur.

F. Flushing twice a year has been helpful, but it is not a solution and a plan needs to be implemented for the extensive future work that needs to happen if any rate increase is to be considered.

G. The Suez petition represents in its filings that more than a 100 million was invested in new areas, particularly Northwest Boise, an investment is being made in a new metering system, and other expenditures, and Intervenors contend there needs to be a plan and expenditure of investment in the older parts of Boise, and particularly the Boise Bench as a higher priority.

In sum, Intervenors plan to present evidence of the need for an extensive upgrade and rehabilitation of the system; that focusing on the older parts of Boise needs to happen; and that a plan needs to be implemented and that no increase in rates should occur until this happens. Instead, if anything, there should be a decrease in rates in those areas where there is substandard service.

3. Names and Addresses of the Intervenors

John Gannon	1104 Johnson Street Boise, Idaho 83705
Stephanie Montero	2715 Shoshone Street Boise, Idaho 83705
Kyme Graziano	4204 Denton Street Boise, Idaho 83706
Karoline Philp	3404 Catalina Road Boise, Idaho 83705

4. Attorney

Marty Durand, Piotrowski Durand PLLC, will represent Intervenors. Her contact information is: P.O.Box 2864 1020 Main Street Suite 440 Boise, Idaho 83701 208-331-9200
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5. Intervenors Requests

These intervenors would not be able to participate and bring their concerns to this proceeding without the opportunity to intervene. The only other intervenor is more concerned with the general rate increase while these intervenors are concerned about how the present rate as well as future rate will impact actual service which they contend is substandard. These intervenors understand there is a cost to rehabilitate the aging, failing water delivery system and present the view that there should be a rate reduction until such work is completed and any rate increases should be applied to this need with a firm plan.

In the event intervention is granted, Petitioners reserve the right to apply for intervenor funding pursuant to RP 161-165.

WHEREFORE, Intervenors respectfully ask the Commission to grant their Petition to Intervene in this proceeding pursuant to the Rules of the Idaho Public Utilities Commission.

Dated this 10th day of November, 2020

By /s/ Marty Durand
MARTY DURAND

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of November 2020, I served the foregoing documents on all parties as follows:

Michael C. Creamer, Attorney for Suez	mcc@givenspursley.com
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By /s/ Marty Durand
MARTY DURAND

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SUEZ Water pushes forward timeline on Boise Bench water solutions

by Haley Squiers

Wednesday, November 13th 2019

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Testing on the materials in this new filter will begin in a couple days. (SUEZ Water video snapshot)

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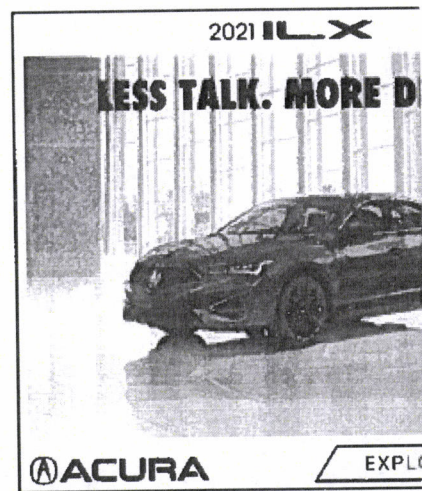
BOISE, Idaho (CBS 2) — SUEZ Water's original plan to fix the murky water on the Boise Bench was to get a filter on the troublesome Taggart Well, but not until next year.

That timeline is not in place anymore.



...ar discolored water in those hotspots of the Bench
...usly and put some urgency behind it," said SUEZ

Water's Administrative Coordinator, Jane Kreller. "And, we agree."



Testing on the materials in this new filter will begin in a couple days.

"We feel pretty confident looking at the testing results, looking at our call data, talking to residents that really tackling the well issue and the water quality issues coming from the well is our best bet," Kreller said.

SUEZ Water have hired a consultant that will build two different prototype filters. One will have a material called green sand the other will have pyrolusite to see which will work best.

"The media that's in [there], it grabs onto that manganese and to the iron, even just a little bit, grabs it and stops it from going out into the distribution system," Kreller said.

SUEZ Water says they are also working to get old, water mains replaced.

"All of those pipeline projects are in design, so we're hoping to have five of those completed

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A decision with the filter system is expected to be made at the beginning of the new year. And, SUEZ Water say they hope to have the filtration system built and ready to go by the end of 2020.