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IDAHO PUBLIC UTILITIES COMMISSION

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ATTORNEY FOR INTERVENOR

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

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

COMES NOW, the Intermountain Fair Housing Council, Inc. (hereinafter "IFHC"), and hereby petitions the Idaho Public Utilities Commission (hereinafter "Commission") for leave to intervene in the above-entitled proceeding and to appear and participate as a party pursuant to:

- (1) Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.71 - 31.01.0.73); (2) the 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 (3) Notice of Application, Suspension of Proposed Effective Date, Notice of Intervention Deadline, Order No. 34819, filed on October 21, 2020.

PETITION FOR LEAVE
TO INTERVENE

As a basis for this Petition, IFHC states and alleges as follows:

1. The name and address of the intervenor is: Intermountain Fair Housing Council, Inc., 4696 West Overland Road, Suite 140, Boise, Idaho 83705.
2. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to IFHC at: Ken Nagy, Attorney at Law, P.O. Box 164, Lewiston, Idaho 83501.
3. IFHC is a private, nonprofit organization organized under the laws of the State of Idaho. Its mission is to ensure open and inclusive housing for all people, and to advance equal access to housing for all persons without regard to race, color, sex, religion, national origin, familial status, sexual orientation, gender identity, source of income, or disability. IFHC attempts to eradicate discrimination based on the above-listed statuses, which are protected under the federal Fair Housing Act, 42 U.S.C. §3601 *et seq.* (hereinafter “FHA”), and other laws and regulations which prohibit housing discrimination. IFHC conducts education on the fair housing laws, housing information and referrals, housing counseling, and assistance with mediating and or filing complaints. IFHC also provides education and outreach on fair housing laws and practices to housing consumers, providers, and others.
4. IFHC has reviewed available information regarding the matters at issue in this proceeding and has determined that the rate increase proposed by Suez Water Idaho Inc. (hereinafter “Suez”) will likely constitute a disparate impact upon ratepayers in violation of the FHA and other laws and regulations which prohibit housing discrimination.
5. Furthermore, IFHC has determined that the failure or refusal of Suez to provide adequate notices to the public in languages commonly spoken in Suez’s service area regarding

the matters at issue in this proceeding likely constitutes disparate treatment in violation of the FHA and other laws and regulations which prohibit housing discrimination. Non-English-speaking ratepayers have thereby been denied a meaningful opportunity to understand and respond to the matters at issue in this proceeding and to provide input to the Commission.

6. Granting intervention to IFHC in this proceeding would enable IFHC to have a material impact on the matters at issue in this proceeding and would allow it to provide further input on the possible violations of the FHA and other laws and regulations which prohibit housing discrimination that will result in the event that the proposed rate increase is approved. If permitted to intervene, IFHC 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.

7. Granting intervention to IFHC will not unduly broaden the matters at issue in this proceeding, will not prejudice any party to this case, and could result in the avoidance of irreparable harm to ratepayers.

8. In the event that intervention is granted, IFHC intends to fully participate in this matter as a party. The nature and quality of IFHC's intervention in this proceeding is dependent upon the nature and effect of other evidence in this proceeding. IFHC requests that the Commission issue a timely order granting this Petition following the seven-day opposition period set forth in IDAPA 31.01.01.075. IFHC 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, IFHC prays that the Commission grant to it the relief sought in this Petition and permit it to intervene as a party to this proceeding.

DATED this 21st day of November, 2020.

Ken Nagy

Digitally signed by Ken Nagy
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email=knagy@lewiston.com, c=US
Date: 2020.11.11 12:46:56 -0800

KEN NAGY
Attorney for IFHC

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of November, 2020, I caused to be served a full, true, and accurate copy of the foregoing by the method/s indicated below, and addressed to the following:

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd.
Building 8, Suite 201-A
P.O. Box 83720
Boise, ID 83720

By U.S. Mail
 By Email to: jan.noriyuki@puc.idaho.gov

David Njuguna
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By U.S. Mail
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PETITION FOR LEAVE
TO INTERVENE

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Ken Nagy

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Ken Nagy