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IDAHO PUBLIC  
UTILITIES COMMISSION

Norman M. Semanko, ISB #4761  
PARSONS BEHLE & LATIMER  
800 West Main Street, Suite 1300  
Boise, Idaho 83702  
Telephone: 208.562.4900  
Facsimile: 208.562.4901  
*NSemanko@parsonsbehle.com*  
*boisedocket@parsonsbehle.com*

Attorneys for Petitioner SUEZ Water Customer Group

**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

**SUEZ WATER CUSTOMER GROUP'S  
PETITION TO INTERVENE**

COMES NOW, SUEZ Water Customer Group (hereinafter "SWCG" or "the Customer Group"), through the undersigned counsel of record, pursuant to the Rules of Procedure of the Idaho Public Utilities Commission (hereinafter "RP"), IDAPA 37.01.01.071–075, and *Notice of Application; Suspension of Proposed Effective Date; Notice of Intervention Deadline; Order No. 34819* (Oct. 21, 2020) (hereinafter "Notice of Application"), and hereby petitions the Commission for an order granting intervention to SWCG to become a party and participate fully in the matter of the *SUEZ Water Idaho Inc. 's Application for Authority to Increase its Rates and Charges for Water Service in Idaho* (hereinafter "Application" or "Rate Case").

1. The address and name of the Petitioner is:

SUEZ Water Customer Group  
c/o Parsons Behle & Latimer  
800 West Main Street, Suite 1300  
Boise, Idaho 83702

2. SWCG is represented by the below counsel of record and, effective immediately, all notices, correspondence, pleadings, filings, or other communications should be directed to the following persons at the address listed below:

Norman M. Semanko  
Parsons Behle & Latimer  
800 West Main Street, Suite 1300  
Boise, Idaho 83702  
*NSemanko@parsonsbehle.com*  
*Boisedocket@parsonsbehle.com*

3. SWCG is an unincorporated nonprofit association, formed and recognized under the laws of the State of Idaho, composed of ratepayers and customers of the Applicant, for the purpose of opposing and responding to the proposed rate increase on SUEZ Water customers. SWCG members stand to be impacted by significant rate increases proposed in the current Rate Case, as set forth in the Application. If granted, these rate increases would average 22.3% across-the-board. Notice of Application at 1. For the average residential customer, the average annual bill would increase from \$355.95 to \$435.22. Notice of Application at 2. This proposed increase is unjust and unreasonable and threatens to impose considerable “rate shock” on SUEZ Water customers, particularly those who are on fixed incomes or whose businesses operate on thin margins. The Customer Group therefore has a direct and substantial interest in the outcome of the Application, as required by RP 74.

4. SWCG seeks intervention as a full party, to participate on behalf of all classes of ratepayers regarding the issues before the Commission, including those presented by the Application, the direct testimony and exhibits submitted by the Applicant, the Notice of Application, and in written comments submitted to the Commission. Therefore, SWCG’s intervention would not unduly broaden the issues, as required by RP 74.

5. A petition to intervene is timely if it is filed by the time provided by order or notice of the Commission. RP 73. The Commission has set an intervention deadline of 21 days after the service of its Order. Notice of Application at 3. As a result, this petition to intervene is timely.

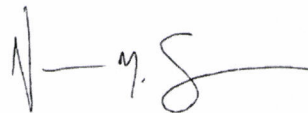
6. SWCG was formed to oppose and respond to the proposed rate increase by the Applicant. The Customer Group's intervention would allow for active participation in all aspects of these proceedings, as necessary to protect the interests of its members and to demonstrate that the proposed rate increase is not just or reasonable. No other party can adequately represent the interests of SWCG. The Customer Group's intervention would not disrupt the proceedings, prejudice the parties, or unduly broaden the issues.

7. In the event intervention is granted, Petitioner SWCG reserves the right to apply for intervenor funding pursuant to RP 161-165.

For the foregoing reasons, SWCG's petition should be granted to allow SWCG to intervene in this matter and fully participate in all aspects of the proceedings regarding the Application filed by SUEZ Water Idaho, Inc.

**DATED** this 10th day of November, 2020.

PARSONS BEHLE & LATIMER



By: \_\_\_\_\_  
Norman M. Semanko



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on the following on this 10<sup>th</sup> day of November, 2020 by the following method:

Jan Noriyuki  
Commission Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Idaho 83702  
*secretary@puc.idaho.gov*  
*jan.noriyuki@puc.idaho.gov*

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- Federal Express
- Hand Delivery
- Electronic Mail or CM/ECF

Dayn Hardie  
Matt Hunter  
Deputy Attorney General  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Idaho 83702  
*dayn.hardie@puc.idaho.gov*  
*matt.hunter@puc.idaho.gov*

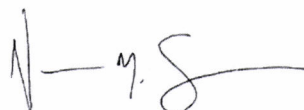
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Michael C. Creamer  
Preston N. Carter  
Givens Pursley LLP  
601 W. Bannock St.  
Boise, Idaho 83702  
*mcc@givenspursley.com*  
*prestoncarter@givenspursley.com*

- U.S. First Class Mail, Postage Prepaid
- U.S. Certified Mail, Postage Prepaid
- Federal Express
- Hand Delivery
- Electronic Mail or CM/ECF

David Njuguna  
Suez Water Management & Services  
461 From Road, Suite 400  
Paramus, NJ 07052  
*David.njuguna@suez.com*

- U.S. First Class Mail, Postage Prepaid
- U.S. Certified Mail, Postage Prepaid
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Norman M. Semanko