

Preston N. Carter, ISB No. 8462  
Morgan D. Goodin, ISB No. 11184  
GIVENS PURSLEY LLP  
601 West Bannock Street  
Boise, Idaho 83702  
Telephone: (208) 388-1200  
Facsimile: (208) 388-1300  
prestoncarter@givenspursley.com  
morgangoodin@givenspursley.com  
16686282\_1.docx[30.235]

*Attorneys for Veolia Water Idaho, Inc.*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

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

**CASE NO. VEO-W-22-02**

**CORRECTED REBUTTAL TESTIMONY  
OF JARMILA CARY**


On March 8, 2023, Rebuttal Testimony of Jarmila Cary was filed with the Commission. By way of Attachment 1, Revision to Ms. Cary's Rebuttal Testimony, page 7, lines 5-7 of Ms. Cary's Rebuttal Testimony is corrected as follows, with changes shown in bold, red text:

Current Rebuttal Testimony: "For Non-Bargaining employees performance ratings consist of 70% individual objective performance and 30% Veolia Values performance (Respect, Customer Focus, Solidarity, and Innovation)."

Corrected Rebuttal Testimony: "For Non-Bargaining employees performance ratings consist of **25%** individual objective performance and **75%** Veolia Values performance (Respect, Customer Focus, Solidarity, and Innovation)."

DATED: March 29, 2023

VEOLIA WATER IDAHO, INC.

By   
\_\_\_\_\_  
Preston N. Carter  
Attorneys for Veolia Water Idaho, Inc.

## CERTIFICATE OF SERVICE

I certify that on March 29, 2023, a true and correct copy of the foregoing was served upon all parties of record in this proceeding via electronic mail as indicated below:

### Commission Staff

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

Dayn Hardie  
Deputy Attorney General  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd., Bldg. 8, Suite 201-A  
Boise, ID 83714

Lorna K. Jorgensen  
Meg Waddel  
Ada County Prosecuting Attorney's Office  
Civil Division  
200 W. Front Street, Room 3191  
Boise, ID 83702

Sharon M. Ullman, *pro se*  
5991 E. Black Gold St.  
Boise, ID 83716

Austin Rueschhoff  
Thorvald A. Nelson  
Austin W. Jensen  
Holland & Hart, LLP  
555 17th Street, Suite 3200  
Denver, CO 80202

Jim Swier  
Micron Technology, Inc.  
8000 South Federal Way  
Boise, ID 83707

### Via Electronic Mail

jan.noriyuki@puc.idaho.gov

dayn.hardie@puc.idaho.gov

civilpfiles@adacounty.id.gov

sharonu2013@gmail.com

darueschhoff@hollandhart.com  
tnelson@hollandhart.com  
awjensen@hollandhart.com  
aclee@hollandhart.com  
kdspriggs@hollandhart.com

jswier@micron.com

Mary Grant  
Deputy City Attorney  
Boise, City Attorney's Office  
150 N. Capitol Blvd.  
PO Box 500  
Boise, ID 83701-0500

BoiseCityAttorney@cityofboise.org  
mrgrant@cityofboise.org



---

Preston N. Carter

Corrected Page 7 to Jarmila Cary's  
Rebuttal Testimony

1 are known, measurable and contractually obligated. It is the Company's position that  
2 bargaining unit wage increases should be reflected in payroll costs for recovery.

3 **Q. Are the Non-Bargaining Unit 2023 pay increases known and measurable?**

4 A. Yes. The Company is finalizing the 2022 performance evaluations for non-bargaining  
5 unit employees in early March, the ratings guide wage increases. For Non-Bargaining  
6 employees performance ratings consist of 25% individual objective performance and  
7 75% Veolia Values performance (Respect, Customer Focus, Solidarity, and Innovation).  
8 The overall Non-Bargaining Unit 2022 performance rating completed in March 2023  
9 resulted in an wage increase of 3.6% with an effective date of April 1, 2023. The  
10 Company's as-filed position anticipated a 4% increase in Non-Bargaining employee  
11 wages. The Company's Rebuttal position removes 0.4% or \$24,117 the difference  
12 between the anticipated and actual wage increases for the Non-Bargaining employees.  
13 Mr. Johnson proposed eliminating all wage increases, a total of \$402,776. The  
14 Company's position is that pay increases are justified, necessary to adjust for cost of  
15 living increases from rising inflation, and to allow for competitive wages to attract and  
16 retain talent. The Company requests recovery of \$161,610 for Bargaining Unit employees  
17 wage increases and \$217,049 for Non-Bargaining Unit employees, a total of \$378,659.

18 **Overtime & Stand By Pay**

19 **Q. Do you agree with Staff Witness Johnson's proposal to remove the 2023 Overtime**  
20 **pay increases of \$14,514 and \$1,176 pay increases for Stand-by pay?**

21 A. No. Overtime pay and Stand-by pay rates are identified in the collective bargaining unit  
22 agreement and follow the established rates of pay. As of April 1, 2023 bargaining unit  
23 wages increase by 2.75% and Overtime and Stand-by pay will follow suit. The