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IDAHO PUBLIC UTILITIES COMMISSION
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FILED
2007-06-08 10:36
IDAHO PUBLIC UTILITIES
COMMISSION

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BOISE, IDAHO 83702-5983

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
UNITED WATER IDAHO INC. TO AMEND) CASE NO. UWI-W-07-3
AND REVISE CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY NO. 143)
TO INCLUDE BRITANNIA HEIGHTS) COMMENTS OF THE
COMMISSION STAFF**

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Scott Woodbury, Deputy Attorney General, and in response to the Notice of Application, Notice of Modified Procedure and Notice of Comment/Protest Deadline issued on May 9, 2007, submits the following comments.

BACKGROUND

On April 23, 2007, United Water Idaho Inc. (United Water; Company) filed an Application with the Idaho Public Utilities Commission (Commission) requesting authority to amend and revise its Certificate of Public Convenience and Necessity No. 143, as amended, to include an area located on McDermott Road in Canyon County, Idaho identified as Britannia Heights. The Britannia Heights subdivision is located in the vicinity of United Water's existing Belmont Heights service area. The Application of the Company includes a legal description and map of the Britannia Heights subdivision.

The developer of Britannia Heights, Patriot Capital Partners LLC, has requested that United Water extend domestic water service facilities to the area. As represented in the Company's Application, the proposed development of Britannia Heights is not within the authorized service territory of any other water utility under the jurisdiction of the Commission nor, it states, will it interfere with the operations of any such utility. United Water submits that the extension into this area is consistent with the public convenience and necessity. Water service facilities will be extended to the area pursuant to United Water's Rules and Regulations governing extensions.

ANALYSIS

Britannia Heights consists of two residential lot subdivisions. Phase I is designed for approximately 34 lots and Phase II is designed for approximately 105 lots. It is adjacent to United Water's existing non-contiguous Belmont Heights service area.

The water supply for Britannia Heights will come from two wells located in the adjacent Belmont Heights subdivision that is already being served by United Water. Both domestic water and fire protection will be provided from these wells. Lawn watering in the Britannia Heights subdivision will be provided by an alternate irrigation source, not from United Water. United Water has performed analysis to determine that it can support the subdivisions without any additional new water supply. Attachment A is a copy of a letter and analysis provided by United Water to the Idaho Department of Environmental Quality confirming adequate existing water supply.

Under United Water Rules and Regulations Governing Non-Contiguous Expansion, Belmont Heights, which will be the source of supply for Britannia Heights, was required to advance source of supply to United Water. The source of supply costs that were advanced are subject to refund as customers connect to the water system and begin taking service. In accordance with Section 14 of the Residential or Multiple Family Housing Non-Contiguous Water System Agreement between United Water, Idaho, Inc. and Thueson Construction and Development (developer of Belmont Heights) dated August 1, 2001, "latecomers" who use the Source of Supply developed for Belmont Heights must reimburse Thueson over a period of 15 years until the amount

of the original advance is paid off.¹ Thus, Britannia Heights, as a latecomer, may be required to reimburse Thueson if the amount of Belmont Heights' original advance has not yet been recovered.

The Britannia Heights subdivisions will be served by extending a 12-inch off-site water main approximately 3,425 feet from the Belmont Heights subdivision (1,580 feet Powerline Road, 1,845 feet McDermott Road). No other off-site facilities will need to be installed to provide service other than the associated 12-inch isolation valves. The developer will contribute these off-site facilities. All on-site facilities will also be contributed by the developer.

Generally in a new subdivision, the facilities to be contributed to United Water by the developer include the off-site and on-site mains, valves, services, and fire hydrants as required by United Water Rules and Regulations. United Water will provide the meter for each service, pursuant to its Rules and Regulations. No facilities are proposed to be advanced to United Water for the Britannia Heights I and II subdivisions. There are not any special facilities required to serve the subdivisions, so accordingly there will be no Special Facilities Agreement.

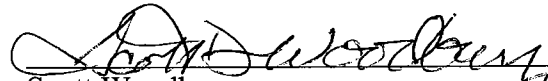
The requested expansion area lies within the City of Nampa Area of Impact. However, the nearest Nampa municipal water facilities are located along Happy Valley Road, approximately 1-1/2 miles west of the proposed Britannia subdivision. The City does not currently provide water service in this area and has provided a letter consenting to service of the area by United Water. (See Attachment B).

¹ 14. Owner shall be reimbursed in connection with use of the Source of Supply by "latecomers," that is, bona fide customers who use the Source of Supply and which customers own a lot or property other than a lot in the Project, whereby costs, not in excess of the original advance of construction costs in connection with the Source of Supply, may be reimbursed to Owner over a period of fifteen (15) years from the date of transfer of the Water Facilities. Owner shall not be entitled or receive any reimbursement after fifteen (15) years from the date of this agreement.

RECOMMENDATION

Staff recommends that the Commission approve the Application for Certificate Amendment and authorize construction of facilities and extension of service to Britannia Heights Subdivision in Canyon County.

Respectfully submitted this 8th day of June 2007.


Scott Woodbury
Deputy Attorney General

Technical Staff: Rick Sterling

[i/misc/comments/uwiw07.3swrps](#)

DANIEL BROWN
Senior Project Engineer

UNITED WATER IDAHO INC.
8248 West Victory Road, Boise, ID 83709
P.O. Box 190420, Boise, ID 83719-0420
Tel: 208.362.7331 • Fax: 208.362.3858
dan.brown@unitedwater.com



April 13, 2007

Mr. Mark Mason, P.E.
Engineering Manager
State of Idaho
Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

Re: Brittanica Subdivision

Dear Mr. Mason:

Phase 1 of Brittanica Subdivision is a 34 lot development generally located on the west side of McDermott Road and approximately 1800 feet south of Powerline Road. Future phases will bring the total number of lots served to 139. Water service will be provided through a 12-inch main extension from the Belmont Water System.

We are hereby submitting current operating and equipment data, which demonstrate the capacity of the Belmont Water System to support the addition of Brittanica Subdivision.

Operating data for July 10, 2006 shows the peak day usage of 64,000 gallons. This was for 74 active customers, resulting in 865 gallons per customer (irrigation water is available from a separate pressurized system). This equals an average of 0.601 gallons per minute over 24 hours. Data is not available for peak hour demand, but using a factor of 2.0, peak hour becomes approximately 1.202 gallons per minute. Typically, for a large system, we expect a factor of about 1.5; however, in a small system like Belmont a factor of 2.0 is more appropriate. This exceeds the peak hour demand quoted in the original Belmont Water System engineering report, dated August 16, 2001, for maximum instantaneous demands without irrigation (see page 5), indicating some irrigation usage from the customers is likely.

The domestic supply pump is designed to produce 350 gallons per minute. The engineering report anticipated a 300 gpm pump and peak hour demand of 1.500 gpm, resulting in 200 residential customers serviceable from the Belmont Water

Mr. Mark Mason
Page 2

System. With the actual 350 gpm pump capacity and a somewhat lower peak hour demand of 1.202 gallons per minute per customer, the maximum number of customers to be served from this pumping unit is 291. This should be the maximum number of customers to be served from this system until additional pumping capacity is installed.

The current number of platted lots approved for service in the Belmont and Lexington Meadows subdivisions is 110. Britannia Subdivision includes 139 lots, for all phases, bringing the total to 249 lots, which is serviceable from the Belmont Water System as noted above. Thus, with the addition of this project, the uncommitted capacity of the domestic source of supply is 42 lots.

In addition, the Belmont domestic well is currently in violation of the uranium MCL and has been under Public Notification status since March 2006. Consequently, we have requested the developer to notify lot buyers of the uranium issue by providing them with copies of Untied Water's Consumer Confidence Report (CCR) prior to closing. Please see the enclosed letter.

We appreciate your review and consideration of the above information and trust it addresses your concerns. Please don't hesitate to call if you have any questions regarding this matter.

Sincerely yours,



Daniel Brown, P.E.

c: Scott Rhead, UWID
John Lee, UWID

ANALYSIS OF FIRE FLOW AVAILABILITY TO PROPOSED BRITANNIA SUBDIVISION FROM THE BELMONT WELL

Adequate fire flow capacity to meet the needs of Britannia Subdivision appears to be available from the Belmont Well water supply, as determined from the following analysis.

EXISTING FIRE FLOW TEST RESULTS FOR LEXINGTON MEADOWS

The most recent fire flow test, from the Belmont Well, was conducted at the fire hydrant located at Lot 22/BI 1 of Lexington Meadows Subdivision on August 8, 2006, following the upgrade of the Belmont Fire Pump.

The results of that test were:

- Static Pressure: 70 psi
- Observed Flow: 1,688 gpm
- Residual Pressure: 25 psi

The elevation of the fire hydrant is approximately 2,630 feet, resulting in a hydraulic gradient line (HGL) of 2,688 feet at a flow of 1,688 gpm:

- $2,630 + 25 \times 2.31 = 2,688$ feet

The frictional head loss for this flow is estimated at 92 feet from the tee in Hastings to the fire hydrant.

- H_f in 2,020 ft of 8" @ 1,688 gpm = 85 ft
- H_f in 1,240 ft of 12" @ 1,688 gpm = 7 ft

This indicates the HGL at the tee in Hastings is 2,780 feet, with a flow of 1,688 gpm.

PROJECTED FIRE FLOW AVAILABILITY TO THE PROPOSED BRITANNIA SUBDIVISION

The frictional head loss for 1,688 gpm between the tee in Hastings to the fire hydrant located at Mountain Pine and Eagle Cr is estimated at 36 feet.

- H_f in 215 ft of 8" @ 1,688 gpm = 9 ft
- H_f in 4,575 ft of 12" @ 1,688 gpm = 27 ft

This results in a HGL at the Mountain Pine and Eagle Creek fire hydrant of 2,744 feet:

- $\text{HGL @ Mountain Pine \& Eagle Creek} = 2,780 - 36 = 2,744 \text{ feet.}$

The elevation of this fire hydrant in Britannia is 2,607 feet, leading to a residual pressure of 137 feet or, 59 psi:

- $2,744 - 2,607 = 137 \text{ feet} \Rightarrow 137 / 2.31 = 59 \text{ psi}$

CONCLUSIONS

As a result of the above analysis, it appears that adequate fire flow should be available to the Britannia Subdivision from the Belmont Well water supply without further modifications to the existing system or the addition of a new water supply source.

Michael J. Fuss, P.E., MBA
Public Works Director



Sheri L. Murray
Executive Assistant

City of Nampa
Public Works Department

RECEIVED
MAY 21 2007
UNITED WATER

May 16, 2007

Mr. Gregory P. Wyatt
Vice President & General Manager
United Water
P.O. Box 190420
Boise, ID 83719-0420

REGARDING: BRITANIA HEIGHTS SUBDIVISION ONE AND TWO

Dear Greg:

This letter serves as an understanding that the City of Nampa does not object to United Water's Belmont Heights water system serving Britania Heights Subdivision One and Two. This subdivision is located in Section 29, Township 3 North, Range 1 West, Boise Meridian, Canyon County, Idaho, consisting of 139 lots, with approximately 111.35 acres.

If I can be of further assistance in regards to this matter, please do not hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Fuss".

Michael J. Fuss, P.E.
Public Works Director

MJF/slm

cc: Jeffery L. Hess, Hawkins Companies
file

Attachment B
Case No. UWI-W-07-3
Staff Comments
06/08/07

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 8TH DAY OF JUNE 2007, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. UWI-W-07-03, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

GREGORY P. WYATT
UNITED WATER IDAHO INC
PO BOX 190420
BOISE ID 83719-0420

DEAN J MILLER ESQ
McDEVITT & MILLER LLP
PO BOX 2564
BOISE ID 83701



SECRETARY