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Attorney for Terra Grande Water

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IDAHO PUBLIC  
UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE  
APPLICATION OF TERRA GRANDE  
WATER REQUESTING THAT THE  
COMMISSION AUTHORIZE INTERIM  
RATE RELIEF AND FURTHER  
PROCEEDINGS TO ESTABLISH JUST  
AND REASONABLE RATES

Case No. ~~FGW-05-01~~ 76W-W-05-01

**AMENDMENT AND SUPPLEMENT  
TO APPLICATION**

COMES NOW Terra Grande Water (the "Company" or "Terra Grande") and pursuant to Commission Rule of Procedure 66 makes this Amendment and Supplement to its Application, filed on February 9, 2005, with the Idaho Public Utilities Commission ("Commission") that requested an Order approving interim rate relief that would increase the Company's current rates and charges for water service in the State of Idaho.

First, due to the emergency which created this matter and because the Company filed its Rate Application prior to receiving its first bill from United Water, Terra Grande requests that the Commission make any interim rate relief effective as of January 28, 2005, the date on which United Water began supplying water to the Company's system.

At the time Terra Grande submitted its Application to the Commission, it had yet to receive a bill from United Water of Idaho, Inc. for the water that was supplied to the Company

ORIGINAL

for its customers. Terra Grande received its first bill from United Water on February 22, 2005, a copy of which has been attached as Exhibit A to this pleading for the Commission's review. This bill is for \$723.49 for a seventeen day period. Although this bill is for a relatively short period of time, it still provides the Commission with hard data to consider in the context of the Company's request for interim and more permanent rate relief.

Finally, Terra Grande has recently been annexed into the City of Boise. Accordingly, to the extent applicable, Terra Grande requests that the Commission consider the potential impacts on the Company's rates that could occur due to the imposition of any municipal franchise fee by the City of Boise for the sale of water to its customers. The Company requests that the Commission consider this both for any interim or permanent rates it chooses to authorize.

WHEREFORE, Terra Grande respectfully requests of the Commission:

1. That the Commission allow the above Amendments to its Application.
1. That its previously filed Application, amended and supplemented by this filing, be heard and acted upon at the earliest possible date;
2. That the Commission find that Terra Grande's existing rates are unjust, unreasonable and insufficient to provide the Company the recovery of its costs and a fair rate of return, and that the revised rates and charges proposed in this Application are just and reasonable on an interim basis. Terra Grande requests that the Commission permit the Company to charge its customers these rates effective upon the receipt of its first bill from United Water.
3. The Commission establish further proceedings to establish just and reasonable rates for Terra Grande's customers.

4. Deferred accounting treatment for excess water supply costs above interim rates if appropriate.
5. That the Commission grant such other and further relief as the Commission may determine proper in the circumstances.

DATE this 1<sup>st</sup> of March, 2005.

BATT & FISHER, LLP



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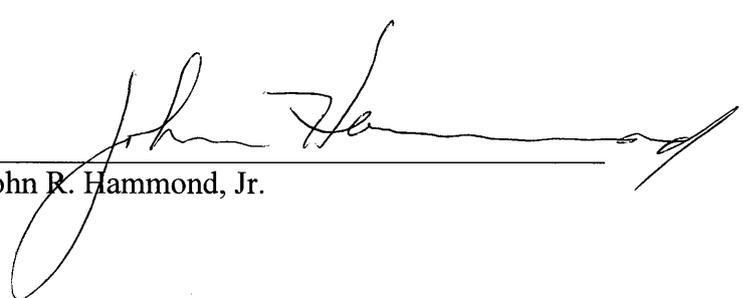
John R. Hammond, Jr.  
Attorneys for Terra Grande Water

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15<sup>th</sup> day of March, 2005, I caused a true and correct copy of the above and foregoing document to be served, in the manner indicated, on the following:

Dean J. Miller  
Attorney for United Water of Idaho, Inc.  
MCDEVITT & MILLER LLP  
420 West Bannock Street  
P.O. Box 2564-83701  
Boise, Idaho 83702

- Hand Delivery
- U.S. Mail
- Facsimile
- Federal Express

  
\_\_\_\_\_  
John R. Hammond, Jr.

United Water

PLEASE DIRECT ALL  
INQUIRIES OR  
CORRESPONDENCE TO:  
UNITED WATER IDAHO  
PO BOX 190420  
8248 WEST VICTORY RD  
BOISE, ID 83719-0420  
PHONE: 208-362-7304

METER READINGS  
04180747 01/28/05 02/14/05  
000000 000316  
04180747 01/28/05 02/14/05  
0000 0375  
CONSUMPTION 691 CCF

BILLING SUMMARY	
PRIOR BILL AMOUNT	\$0.00
PAYMENTS THRU 02/16/05	\$0.00
BALANCE FORWARD	\$0.00
CURRENT BILL CHARGES:	
CONSUMPTION CHARGE	\$678.91
CUSTOMER CHARGE	\$23.37
SAFE DRINKING WTR FEE	\$0.14
BOISE FRANCHISE FEE	\$21.07
TOTAL CURRENT CHARGES	\$723.49
TOTAL AMOUNT DUE	\$723.49

YOU HAD NO CONSUMPTION RECORDED FOR THE SAME PERIOD LAST YEAR.

\*\* WINTER RATES ARE IN EFFECT UNTIL APRIL 30TH. AS COLD WEATHER  
NEARS, BE SURE TO WINTERIZE YOUR SPRINKLER SYSTEM, DISCONNECT  
HOSES FROM OUTSIDE FAUCETS AND INSULATE ANY EXPOSED PIPES. \*\*

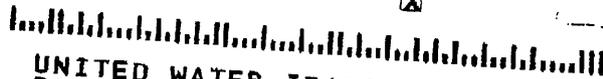
Bill Date	Service Address	Account Number	Amount Due
02/16/05	DORIAN/ENTERTAINMENT	06000998168747	723.49

Please keep this portion of bill for your records

PLEASE RETURN THIS PORTION OF BILL WITH YOUR PAYMENT

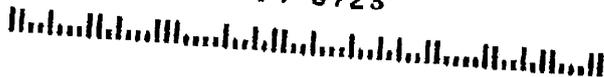
0600099816874700000072349000000005

Make payment to:



UNITED WATER IDAHO  
PAYMENT CENTER  
PO BOX 371385  
PITTSBURGH, PA 15250-7385

TERRA GRANDE WATER  
C/O BARBARA CHILD  
10012 ESHELMAN  
BOISE ID 83704-6723



Bill Date	Due Date	Amount Due
02/16/05	03/08/2005	723.49

Are we spelling your name  
and address correctly?  
If not, please check this  
bill and our reverse side.

Amount enclosed

DORIAN/ENTERTAINMENT 06000998168747

723.49

