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IDAHO PUBLIC
UTILITIES COMMISSION

ORIGINAL

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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

Case No. UWI-W-04-04

**ANSWER TO IDAHO RIVER
UNITED'S PETITION FOR
AMENDMENT OR
RECONSIDERATION**

COMES NOW United Water Idaho Inc., ("Company", "United Water") and,
pursuant to IPUCRP 331.05, Answers the Petition of Idaho Rivers United ("IRU") for
Amendment or Reconsideration ("Petition") as follows:

As noted in the Petition, United Water agrees that the preparation of a new
conservation plan is appropriate. At hearing the Company committed to undertake steps
toward the creation of a new plan. (Tr., pg. 981).

The Company disagrees, however, with the Petition's suggestion that a December
15, 2005 deadline be established for completion of the plan. (Petition, pg. 3). As Mr.
Wyatt explained at the hearing, it is not clear that the necessary effort required to prepare
a plan can be accomplished in that length of time:

The Company is, however, unsure how long the consultant procurement
process will take and is similarly unsure how long such a comprehensive
study will take. Therefore, the Company recommends the Commission

allow it the opportunity to identify and interview potential consulting firms to determine timing before establishing a deadline for the study completion. (Tr., pg. 981).

Preparation of a comprehensive plan will require completion of several tasks, including: research possible consulting firms to do the study, evaluate their experience, develop a scope of work, issue RFP's, review proposals, interview potential consulting firms, select one, and establish a contract. The selected consultant must then perform its analysis and prepare a written report. While the Company will proceed expeditiously with the planning project, the Company doubts all of these tasks can be completed by December 15, 2005.

Moreover, there is not support in the record for the selection of a December 15, 2005 deadline as suggested in the Petition. IRU Witness Wojcik did not recommend a specific deadline for completion, only that the new plan be completed "as soon as possible following this case." (Tr., pg. 949, 953).

Accordingly, taking into account the number and complexity of tasks to be accomplished and the Company's prior experience with conservation planning, the Company recommends that the Commission establish a deadline for submission of a plan nine (9) months from the date of an order requiring preparation of the plan.

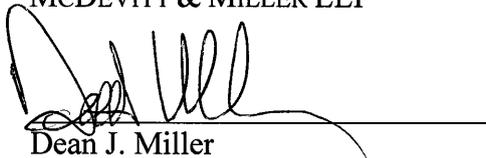
Additionally, the Petition appears to pre-judge conservation programs to be implemented, as it suggests, "The plan should include recommendations for *implementation* of conservation programs including rebate and retrofit incentives for water-saving devices, landscaping or other measures." (Petition, pg. 3, emphasis added).

Presumably, the purpose of a conservation planning effort would be to evaluate the viability and cost-effectiveness of various measures, before requiring their implementation.

Accordingly, the Company recommends that any Commission order requiring the preparation of a conservation plan not pre-endorse any specific measures, but require an evaluation of all potential measures.

Dated this 24 day of August, 2005

MCDEVITT & MILLER LLP

A handwritten signature in black ink, appearing to read "D. Miller", is written over a horizontal line. The signature is fluid and cursive.

Dean J. Miller

Attorneys for United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of August, 2005, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

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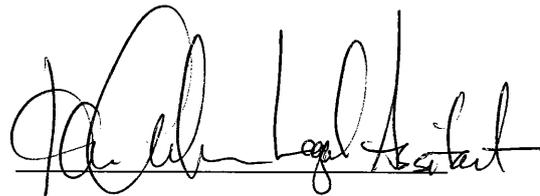
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Handwritten signature of Mark Gennari, with the words "Legal Assistant" written below it.