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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for Petitioner  
Community Action Partnership  
Association of Idaho

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION	)	CASE NO. UWI-W-04-4
OF UNITED WATER INC. FOR	)	
AUTHORITY TO INCREASE ITS RATES	)	
AND CHARGES FOR WATER SERVICE IN	)	COMMUNITY ACTION
THE STATE OF IDAHO	)	PARTNERSHIP ASSOCIA-
	)	TION OF IDAHO'S
	)	PETITION TO INTERVENE
	)	

COMES NOW, Community Action Partnership Association of Idaho (hereinafter "CAPAI" or "Intervenor") and, pursuant to Rules 071-075 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-075, hereby petitions the Commission for leave to intervene in this proceeding and to appear and participate with full parties' rights. In support of this Petition, CAPAI states as follows:

1. The address and name of the respective Intervenor is:

Community Action Partnership Association of Idaho  
P.O. Box 8224  
Boise, ID. 83707

2. This Intervenor will be represented in this proceeding by:

Brad M. Purdy  
Attorney at Law  
2019 N. 17<sup>th</sup> St.

Boise, ID. 83702  
208-384-1299  
FAX: 208-384-8511  
Email:

Copies of all pleadings, production requests, responses, Commission Orders and Notices and other documents should be provided to Brad M. Purdy.

3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Idaho Migrant Council and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty include high utility costs for United Water Idaho's low income rate payers. Low income families pay a higher percentage of their income for utility expenses than those in other economic categories.

CAPAI notes that beginning on page 16 of his pre-filed direct testimony, United Water Idaho witness Gregory P. Wyatt states that the Company does not currently have a low-income assistance program in place. Mr. Wyatt states that, in light of the requested 22% overall rate increase, United Water Idaho recognizes the need to consider and discuss such a program. United Water Idaho proposes conducting a workshop(s) prior to the hearing on its application for the purpose of collaboratively designing such a program for the Commission's consideration.

CAPAI obviously supports United Water Idaho's foregoing proposal, in the abstract. CAPAI respectfully submits that its involvement in this proceeding is essential to a full and meaningful consideration of the issue.

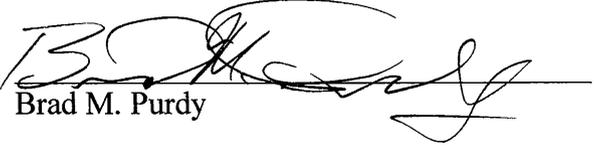
CAPAI further believes that, based upon empirical studies conducted on the issue, there are system-wide benefits to be derived from properly structured low-income

assistance programs, thereby potentially benefiting all of United Water Idaho's customers.

4. CAPAI intends to participate in this proceeding as a party and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument and otherwise fully participate as a party.

WHEREFORE, the Community Action Partnership of Idaho hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the attendant rights and responsibilities.

DATED, this 22nd day of December, 2004.

  
Brad M. Purdy

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 22nd day of December, 2004, I caused to be served the foregoing PETITION TO INTERVENE OF COMMUNITY ACTION PARTNERSHIP ASSOCIATION OF IDAHO on the following, in the manner indicated.

Weldon Stutzman  
Deputy Attorney General  
Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, ID. 83702

- U.S. Mail, postage prepaid
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