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IDAHO PUBLIC
UTILITIES COMMISSION

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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-04-4

ANSWER TO RESPONSE TO INTERVENTION
PETITIONS

INTRODUCTION

On December 29, 2004, United Water Idaho, Inc. ("UWI") filed a Response to Intervention Petitions ("Response") opposing the Petition to Intervene filed by Scott L. Campbell. This Answer is filed in reply to UWI's response.

I. UWI's Response Should Be Ignored Because It Does Not Comply With IDAPA 31.01.01.075 Rules Of Procedure Of The Idaho Public Utilities Commission

IDAPA 31.01.01.075 specifies that "[a]ny party opposing a petition to intervene must do so by motion in opposition filed within seven (7) days after receipt of the petition to intervene and served upon all parties of record and upon the person petitioning to intervene."

UWI failed to file such a motion, as required by the rule. Since the rule is mandatory, failure to comply with its requirements dictates that UWI's Response should be ignored.

II. UWI Attempts To Exclude Intervenor Campbell Without Any Supporting Authority

UWI contends that Scott Campbell should be denied intervention because his status as an individual ratepayer does not represent a "direct and substantial" interest, citing absolutely no legal authority.

Given the high water rates UWI already charges its residential customers, it is self-evident that Mr. Campbell's interest in a reduction instead of an increase of UWI's rates is a "substantial" interest. Additionally, his status as a residential customer demonstrates that his interest in this proceeding is "direct." Furthermore, if successful, his participation will benefit all residential customers of UWI.

III. UWI's Rate Increase Application Relates Directly To New Surface Water Treatment Facilities For Which Mr. Campbell Has Particularized Knowledge

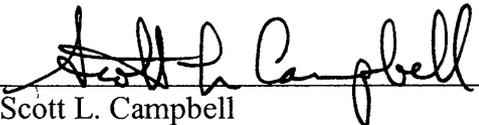
Mr. Campbell served as counsel for parties who protested UWI's recent applications for new surface water rights before the Idaho Department of Water Resources to supply the Columbia Water Treatment Facility. Because of that representation, he has unique information concerning UWI's water rights assets. Such information will be particularly relevant in the Commission's determination of "used and useful" in this case.

Additionally, Mr. Campbell has particular information regarding UWI's "need" to develop additional surface water treatment facilities because of his knowledge of UWI's other water rights.

CONCLUSION

There is no basis for excluding Mr. Campbell from this proceeding. Instead, he can provide a perspective which no other party can. Moreover, UWI failed to comply with the mandatory requirements of the Commission's rule regarding opposition to intervention. It should be ignored.

DATED this 18th day of January, 2005.

By 
Scott L. Campbell

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of January, 2005, I caused a true and correct copy of the foregoing **ANSWER TO RESPONSE TO INTERVENTION PETITIONS** to be served by the method indicated below, and addressed to the following:

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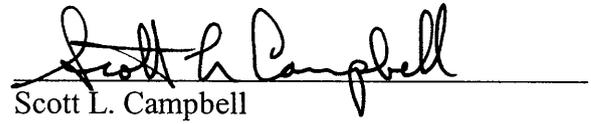
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