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Attorney for the Commission Staff

BEFORE  THE  IDAHO  PUBLIC  UTILITIES  COMMISSION

IN THE MATTER OF THE APPLICATION)

OF UNITED WATER IDAHO INC. FOR) CASE  NO.  UWI-W-98-3

APPROVAL OF COST OF SERVICE)

ALLOCATIONS AND RATE DESIGN.)SECOND PRODUCTION

)REQUEST OF THE

)COMMISSION STAFF

)TO UNITED WATER

)IDAHO INC.

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The Staff of the Idaho Public Utilities Commission by and through its attorney of record, Scott Woodbury, Deputy Attorney General, requests United Water Idaho Inc. (UWI; Company) provide the following documents and information, pursuant to Commission Rule of Procedure 225, IDAPA 31.01.01.225, on or before TUESDAY, OCTOBER 20, 1998.

This production request is to be considered as continuing, and United Water Idaho Inc. is requested to provide by way of supplementary responses, additional documents that you or any person acting on your behalf may later obtain that will augment the documents produced.

Please provide answers to each question; supporting workpapers that provide detail or are the source of information used in calculations; the name and telephone number of the person preparing the documents; and the name, location and telephone number of the record holder.

REQUEST NO. 46:  Please provide an electronic copy of the cost of service study and rate design workpapers in Excel or Lotus format.

REQUEST NO. 47:  Provide an assessment, including any supporting analysis completed by UWI, of the effects of the current summer/winter rate differential rate design on summer peak consumption.

REQUEST NO. 48:  Please compare UWI’s proposed rate design to its current rate design in terms of their expected ability to reduce summer peak consumption.

REQUEST NO. 49:  In UWI’s response to Request No. 26 of Staff’s First Production Request, 67% of the shoulder period water usage was allocated to the base period.  Please explain the basis for this allocation.

REQUEST NO. 50:  Please provide supplemental billing records for 1996-1998 for any additional meters/accounts not included in UWI’s earlier response to Request No. 31 of Staff’s First Production Request for Micron Technology, Hewlett Packard, Darigold, and St. Lukes Hospital.

REQUEST NO. 51:  How many customers have dual irrigation or separate irrigation systems?

REQUEST NO. 52:  Provide a description of the billing process for Micron.  Please provide copies of actual billings for 1996 through the present.  Is Micron billed on a per meter basis, or are multiple meters consolidated on a single bill?

REQUEST NO. 53:  How were the consumption breakdowns given in the response to Request No. 33 of Staff’s First Production Request determined?  The irrigation use appears to not have been reduced significantly (per Micron’s letters given in Gradilone’s Exhibit 3).  Is Micron’s purported reduced consumption due to reduced potable, industrial or irrigation use?

DATED at Boise, Idaho, this              day of October 1998.

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Scott Woodbury

Deputy Attorney General

Technical Staff:Rick Sterling

SW:RS:jo/umisc/prodreq/uwiw983.2nd