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RECEIVED
APR 05 2018
DEPARTMENT OF
WATER RESOURCES

Attorneys for Applicant SUEZ Water Idaho Inc.

BEFORE THE IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED
MUNICIPAL APPLICATION PACKAGE
("IMAP") OF SUEZ WATER IDAHO INC.,
BEING A COLLECTION OF INDIVIDUAL
APPLICATIONS FOR TRANSFERS OF
WATER RIGHTS AND APPLICATIONS
FOR AMENDMENT OF PERMITS.

AFFIDAVIT OF MICHAEL R. GALANTE

State of Idaho)
) ss.
County of Kootenai)

MICHAEL R. GALANTE, being first duly sworn upon oath, deposes and states:

1. I am the District Manager of the North Kootenai Water and Sewer District (NKWD) located at 13649 North Meyer Road in Rathdrum, Idaho. I have held this position since 2005.
2. I will be retiring from that position at the end of the month, but I expect to remain active in water rights issues in Idaho.
3. Chris de Groot will take over my position as District Manager at NKWD when I leave.
4. My resume is set out as Exhibit A to this affidavit.
5. In my capacity with the NKWD, I have been extensively involved in water planning issues for decades. I have done so both in connection with NKWD's water planning and in connection with broader regional and interstate water planning efforts.
6. I also serve on the advisory committee for the Rathdrum Prairie Aquifer Comprehensive Aquifer Management Plan (RPA CAMP). My name is listed in that capacity on page 21 of the RPA CAMP study issued on July of 2011.
7. In addition, I participated in the development of the Rathdrum Prairie Aquifer Future Demand study undertaken by the Idaho Water Resources Research Institute (IWRRI) that was issued in December of 2014 (IWRRI Study). I am listed as a signatory representing NKWD on the Memorandum of Understanding attached to the IWRRI Study.

8. In addition, I have served as a member of the Kootenai County Aquifer Protection District, the Idaho Washington Aquifer Collaborative (IWAC) and the Aquifer Atlas Committee.

9. Finally, I have been actively engaged in dialog with players in Idaho and Washington State addressing interstate water issues. I am actively engaged with other water purveyors in Washington and Idaho.

10. I am aware that SUEZ Water Idaho Inc. (SUEZ) has filed an application to change many of its municipal water rights to add alternative points of diversion and to bring them within the protection of the statute that exempts “reasonably anticipated future needs” (RAFN) water rights from forfeiture.

11. The RAFN quantification process is a valuable exercise that sets Idaho apart from other states, making it a leader in long-term municipal water planning. It adds transparency and oversight to a process that in other states is often undertaken behind closed doors. The restrictions on the sale of RAFN rights ensure that Idaho will avoid the hoarding of water rights and the conflicts among municipal water providers that have plagued other states. These benefits will be lost, however, if municipal providers are not allowed to plan sufficiently far into the future.

12. Securing RAFN rights also provides protection to Idaho water users in the event of interstate water disputes.

13. Although I have not tracked the SUEZ applications closely, I am aware that SUEZ is seeking a 50-year planning horizon and that this planning horizon has been challenged by one of the Protestants as too long.

14. I am not in a position to comment on the validity or accuracy of SUEZ's forecast. I am in a position, however, to comment on the reasonableness of the duration of SUEZ's forecast, in light of my work on water issues in North Idaho and Washington.

15. The RPA CAMP study employed a 50-year planning horizon. The IWRRI Study has a 30-year planning horizon. Both of these are reasonable under the circumstances, taking into account the differing purposes of the studies.

16. The RPA CAMP was a region-wide municipal demand forecast. It did not attempt to allocate demand to individual municipal providers.

17. The IWRRI Study sought to allocate that overall regional demand to individual municipal providers. This entailed a mediation process. Given the number of entities at the table and the sometimes conflicting interests involved, 30 years was as far out as the group could agree to go.

18. Importantly, the IWRRI Study did not contain any re-opener provision. It is a fixed 30-year projection of future demand. It is expected that individual municipal providers will proceed with RAFN applications for fixed 30-year periods based on this allocation, without any re-opener provisions.

19. In contrast, I understand that the SUEZ RAFN application calls for a re-opener condition that will allow SUEZ's future demand to be re-examined periodically, and that adjustments can be made in the event then-current circumstances no longer justify holding the full quantity of water for 50 years.

20. I believe that re-opener provision is important in justifying SUEZ's 50-year planning horizon. That distinguishes it from the 30-year planning horizon in the IWRRI Study

and makes it more analogous to the 50-year planning horizon in the RPA CAMP (which could be re-evaluated at any time).

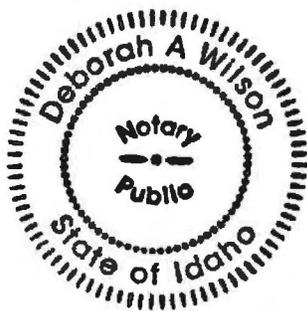
21. In sum, based on my experience in water planning on behalf of various water entities in the State of Idaho, I believe it is essential that municipal providers, such as SUEZ, that serve rapidly growing areas of the State should be allowed to plan for, secure, and protect from forfeiture out of-state demands sufficient water rights for the long term.

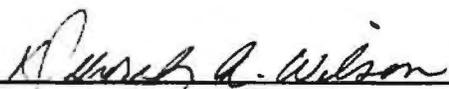
22. Fifty years is a long time. But with a re-opener provision, I do not believe that the 50 years sought by SUEZ is unreasonable or inconsistent with the planning work we have undertaken for water rights in North Idaho.

DATED this 5th day of April, 2018.

By 
Michael R. Galante

Subscribed and sworn to before me this 5th day April, 2018.




Notary Public for Idaho
Residing at: Bozeman County, Idaho
My Commission Expires: 03-13-2021

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of April, 2018, the foregoing was filed, served, and copied as shown below. Service by email is authorized by the Hearing Officer's Order of September 11, 2017 at page 3.

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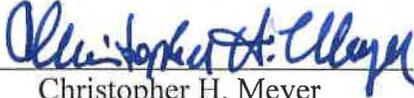
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Christopher H. Meyer

Exhibit A RESUME OF MICHAEL GALANTE

Michael Galante

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Cell: 208-661-9182 mlkegalante.1@gmail.com

Executive Summary

Experienced general manager with strong leadership and relationship building skills. Project management skills, with strong ability to communicate effectively with customers, employees and business audiences.

Professional Experience

District Manager

April 2005 to Present

North Kootenai Water & Sewer District – Kootenai County Idaho - Full charge manager for 15 public water and 1 wastewater system

Accomplishments

- Board of County Commissioners appointment to the Aquifer Protection District (APD)
- Achieved Professional Human Resources certification (PHR) & SHRM (CP) Certified Professional
- Plan and develop Infrastructure Improvements to an aging water district - \$6.5 mil. In completed projects in 36 months
- Prepare and submit to board of directors annual budget - \$3 million revenue
- Acquisition and expansion of existing facilities, doubled District size in 7 years
- Secure Low Interest Loans (\$800K @ .25% Int. 30 yr.) (\$1.25 mil. 2.25% 20 yr.) for expansion of services to areas adjacent to existing service areas
- Initiated District's GIS mapping program
- Initiated and worked with engineering consultant to create a Water Conservation Plan
- Plan and install VFD pumping stations, energy saving of 22%
- Initiated and implemented radio read meter program, 50% labor savings on monthly meter reading cost
- Develop and recommend policy to elected board of directors
- Leadership of District's staff- customer service emphasis
- Daily administration in all phases of business operation
- HR responsibilities, hiring, employee performance reviews, disciplinary action, salary reviews, establish training programs for employees
- Created new Employee Manual – ensure employee understand and adhere to District policies and procedures
- Project planning with engineering consultants
- Resolve legal issues facing the District with legal counsel
- Risk Manager for the District – PRIMA risk management trained/certification
- Inter-agency relationships with Idaho Department of Environmental Quality, Idaho Department of Water Resources, Panhandle Health District, worked directly with these agencies
- Initiated drug testing program – Drug Free Workplace
- Initiated and conducted District's Safety Program
- Ability to express myself clearly and concisely both in writing and verbally
- Ability to plan, supervise, and coordinate long range projects
- I work well with others to achieve common goals
- Ability to interpret current legislation, rules and regulations – July 2012 secured renewal of wastewater discharge permit from IDEQ.

Board President/Water Master

January 1989-March 2005

Honeysuckle Hills Owners Association-Hayden Idaho – Responsible Charge Operator for public water system supplying 205 active connections

Accomplishments

- Responsible for all phases of water system distribution including coordination of repairs, taking water samples, compliance activities
- Reported to Owners Association Board of Directors on monthly system status
- Read water meters monthly during spring, summer, and fall
- Handle customer complaints
- Coordinated construction activity with engineers and contractors
- Served as Board President
- Secured low interest loan from IDEQ for Infrastructure Improvements
- Coordinated annexation and conveyance agreements from HHOA to NKWSD

Business Owner

June 2001 to March 2005

Advanced Water Technologies dba Kinetico Quality Water –Spokane, Washington

Owned and managed water filtration company, residential and commercial water filter sales and service

Accomplishments

- Increased sales at Kinetico from \$250K to \$856K in 3 years
- Commercial filter/softener Installations for Northern Quest Casino, The Davenport Hotel, Warrlor Restaurant at Fairchild AFB, Anheuser Busch hop farm, Usk Paper Mill

General Manager- Project Manager

September 1986 to June 2001

H2O Well Service – Hayden, Idaho

Water well installation, pump system contractor for northern Idaho and eastern Washington. Experience in drilling techniques, water system design, installation, wastewater pumping systems

Accomplishments

- I had a direct role in increasing company sales from \$800K to over \$2.5 mil
- Gained substantial knowledge of geology of northern Idaho and eastern Washington
- Work with hydro-geologists on drilling projects
- Effective project manager for commercial and residential water systems & wastewater systems
- Gained substantial knowledge of pumps, electrical controls, hydraulic valves
- Worked with engineering consultants on system designs

Education & Certifications

Eastern Michigan University – Ypsilanti Michigan

Economics/Business

Bachelor of Science, Economics

Idaho DWD-3 Drinking Water Distribution Certification, DWT-2 Drinking Water Treatment Certification WWT-OIT

Wastewater Treatment

Professional Human Resources Certification (PHR) – Human Resources Certification Institute

Certified Risk Management – PRIMA Idaho Risk Managers Association

Affiliations

- American Water Works Association
- American Backflow Prevention Association
- CAMP- Comprehensive Aquifer Management Planning, advisory committee for the Rathdrum Prairie Aquifer to the Idaho Water Resource Board
- IWAC- Idaho Washington Aquifer Collaborative –past president
- KCUC- Kootenai County Utility Council (811, Call Before You Dig) board president, current council member
- INSHRM Inland Northwest Society of Human Resource Managers
- SHRM (national) Society of Human Resource Managers
- Spokane Valley- Rathdrum Prairie Aquifer Atlas – 2015 Edition planning/implementation committee
- Idaho Water Users Association
- PRIMA Idaho Risk Managers Association
- Kootenai County - Aquifer Protection District Board

References Available Upon Request