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DEPARTMENT OF
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BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

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

PIONEER'S RESPONSE TO UNITED
WATER'S MOTION FOR CLARIFICATION
OF PARTY STATUS

I.
INTRODUCTION

This is the response of Pioneer Irrigation District ("Pioneer") to United Water
Idaho's Motion for Clarification of Part Status.

II. DISCUSSION

Pioneer disagrees with United Water Idaho's ("UWID") comments regarding Pioneer's Petition for Reconsideration. First, the UWID comments inappropriately attempt to provide additional substantive argument on the Petition, despite UWID's position at the April 13, 2012 status conference that the matter had been fully briefed. Contrary to UWID's comments in its motion, the sanctions ordered by Peter Anderson were not the result of "serious discovery misconduct." Pioneer reaffirms that it did nothing improper in the discovery responses it provided to UWID.

Moreover, Pioneer believes that UWID is attempting to circumvent the determination of the Director to review the Petition and act on it. In this regard, the Affidavit of Counsel filed concurrently with this Response demonstrates UWID's intent.

DATED this 1st day of May, 2012.

MOFFATT, THOMAS, BARRETT, ROCK &
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By Scott L. Campbell
Scott L. Campbell – Of the Firm
Attorneys for Pioneer Irrigation District

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of May, 2012, I caused a true and correct copy of the foregoing **PIONEER'S RESPONSE TO UNITED WATER'S MOTION FOR CLARIFICATION OF PARTY STATUS** to be served by the method indicated below, and addressed to the following:

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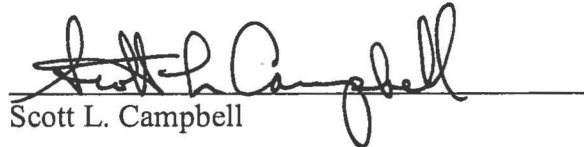
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