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DEPARTMENT OF  
WATER RESOURCES

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*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.

**SUEZ'S EXPERT WITNESS  
DISCLOSURE**

Pursuant to the Hearing Officer's November 15, 2017 *Order Authorizing Discovery*;  
*Scheduling Order*; *Notice of Hearing*, Applicant SUEZ Water Idaho Inc. ("SUEZ") discloses the  
expert witnesses it intends to call at the hearing in this matter as follows:

1. John S. Church  
President, Idaho Economics  
P.O. Box 45694  
Boise, ID 83711-5694  
208-284-0836
2. Don C. Reading, Ph.D.  
Consulting Economist, Ben Johnson Associates, Inc.  
6070 W Hill Rd  
Boise, ID 83703-2958  
208-342-1700
3. Christian R. Petrich Ph.D., P.E., P.G.  
Principal Engineer/Hydrologist, SPF Water Engineering, LLC  
300 E Mallard Dr, Ste 350  
Boise, ID 83706  
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4. Phillip J. Rassier, Esq.  
Project Advisor, Idaho Water Engineering, LLC  
Les Jardins de l'Abbaye  
18 Rue de l'Equerre  
51100 Reims  
FRANCE  
Office: 208-287-4800
5. Gregory P. Wyatt  
Vice President and General Manager, SUEZ Water Idaho Inc.  
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Boise, ID 83709  
208-362-7328

The expert witness reports for these experts are contained in SUEZ's *Master Water Plan for the Years 2015 to 2065* ("2065 Master Plan"), which was submitted into the record in this proceeding and served upon all parties on April 28, 2017.

Specifically, Mr. Church's expert report is contained in the *2065 Master Plan's* Section V (entitled "The Church Forecast: Quantifying SUEZ's reasonably anticipated future needs during the Planning Horizon"), Exhibit 3 (the Affidavit of John S. Church), and Appendix A (the Supporting Data Spreadsheets for the Church Forecast), and his resume is included as Exhibit 4.

Dr. Reading's expert report and affidavit are included as the *2065 Master Plan's* Exhibit 5, and his resume is included as Exhibit 6.

Dr. Petrich's expert report is included as the *2065 Master Plan's* Exhibit 7, and his resume is included as Exhibit 8.

Mr. Rassier's expert report is included as the *2065 Master Plan's* Exhibit 9, and his resume is included as Exhibit 10. Mr. Rassier is included in this disclosure in recognition that his report contains his expert opinion on a legal issue. SUEZ does not anticipate calling Mr. Rassier as a witness for three reasons: His report speaks for itself. The Department does not ordinarily allow expert witnesses on purely legal questions. Mr. Rassier now lives in France.

Mr. Rassier is disclosed as a potential expert witness only to foreclose the possibility of an objection to the Hearing Officer's consideration of the content of Mr. Rassier's report based upon a failure to disclose him as an expert witness.

Finally, the Applicant anticipates calling Mr. Wyatt as a fact witness to provide explanatory and background material regarding the applications and to establish any of the factual bases for the applications or the facts and conclusions described in the *2065 Master Plan*. To the extent he is called upon to explain the company's operations and why it operates that way, why the applications are needed, and how the requested planning horizon and planning area were determined, someone might contend that his answers contain expert opinion testimony. Without conceding that point, and solely to avoid an argument over whether he should have been disclosed as an expert, SUEZ discloses him as an expert witness here.

Mr. Wyatt's expert report consists of Sections III ("50-year Planning Horizon") and IV ("Planning Area") of the *2065 Master Plan*, together with Exhibit 1 thereto. Mr. Wyatt's resume is attached hereto as Exhibit A.

Respectfully submitted this 16<sup>th</sup> day of February, 2018.

GIVENS PURSLEY LLP

By   
Christopher H. Meyer

By   
Michael P. Lawrence

*Attorneys for SUEZ Water Idaho Inc.*

## EXHIBIT A: RESUME OF GREG P. WATT



# Biography

## Greg Wyatt

Vice President & General Manager  
SUEZ Water Idaho

Greg Wyatt serves as Vice President and General Manager of SUEZ Water Idaho, which provides water service to over 233,000 residents of Boise, Idaho and its vicinity. Greg has over 43 years of experience in the water industry in the United States.

In addition to his expertise in finance, long-term investment and planning, Greg has a wealth of experience in water operations and management. Under his management, SUEZ Water Idaho successfully implemented membrane and granular activated carbon treatment solutions to both surface water and groundwater supplies.

Greg joined SUEZ North America in 1974 as an accountant. He has held positions of increasing responsibility with the company in both finance and management in Pennsylvania, New Jersey, Indiana and Idaho. He has previously served as general manager of Pennsylvania operations, area manager for Indiana operations, assistant manager of Boise operations, district accountant for southern New Jersey operations and western Pennsylvania.

As past-Treasurer and Trustee on the Board of the Pacific North West Section – American Water Works Association (PNWS-AWWA), Greg's dedication to the industry is evident. His past involvement with industry associations includes 10 years as a board member and officer with the National Association of Water Companies in Indiana and Pennsylvania. In recognition of his devotion, he received the 2007 PNWS-AWWA George Warren Fuller Award, and the 2010 Powell-Lindsay Citation, the highest awards within the Section.

Greg serves on the Boise Metro Chamber of Commerce Board of Advisors, and is a member of the Boise Valley Economic Partnership, which focuses on new business attraction and retention within the Boise Valley.

Greg holds a B.S. in business administration and management from Bloomsburg University.

September 2016



Greg Wyatt

Vice President  
& General Manager

Joined SUEZ  
1974

### Previous positions:

#### SUEZ North America

- General Manager, Pennsylvania
- Area Manager, Indiana
- Assistant Manager, Boise
- District Accountant, Southern New Jersey
- District Accountant, Western Pennsylvania
- Accountant, Central Region

### Education:

B.S., Business Administration  
and Management

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16<sup>th</sup> day of February, 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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