

COPY

Christopher H. Meyer [ISB No. 4461]
Michael P. Lawrence [ISB No. 7288]
Jack W. Relf [ISB No. 9762]
GIVENS PURSLEY LLP
601 West Bannock Street
P.O. Box 2720
Boise, Idaho 83701-2720
Office: (208) 388-1200
Fax: (208) 388-1300
www.givenspursley.com

RECEIVED

APR 03 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 ROGER D. DITTUS

State of Idaho)
) ss.
County of Ada)

ROGER D. DITTUS, being first duly sworn upon oath, deposes and states:

Background

1. I am a Hydrogeologist employed by SUEZ Water Idaho Inc. ("SUEZ"), the applicant in this proceeding. My office address is 8248 W. Victory Rd., Boise, Idaho 83709.
2. I have personal knowledge of the facts set forth in this Affidavit.
3. I have a Bachelor of Science degree in Geology (Boise State University 1991) and am registered as a Professional Geologist with the Idaho Bureau of Occupational Licenses.
4. My duties at SUEZ have included water well design, hydraulic testing, efficiency monitoring/evaluation, rehabilitation, and various duties related to water rights such as evaluating surface water rental pool needs and groundwater right protest resolution. I served as one of the reviewers and provided information as necessary for SUEZ's *Master Water Plan for the Years 2015 to 2065* ("2065 Master Water Plan").

Discussion

5. The *2065 Master Water Plan* includes as Exhibit 1 a map known as the "Pink Line Map." The Pink Line Map displays SUEZ's planning area. This is the geographic area that SUEZ anticipates serving at the end of the 50-year planning horizon.
6. The Pink Line Map also displays SUEZ's certificated area. This is geographic area that SUEZ is now authorized to serve by the Idaho Public Utilities Commission.
7. For purposes of these proceedings (the IMAP), I was asked to confirm which municipal jurisdictions fall within SUEZ's planning area. Working with SUEZ's GIS technical

team, I examined the area of city impact for each city within Ada County and compared those boundaries to SUEZ's certificated area and its planning area.

8. Based on this examination, it is evident that the largest part of SUEZ's certificated area and planning area fall within the City of Boise's area of city impact. In addition, SUEZ's certificated area and planning area include portions of the following: (1) the City of Eagle and its area of city impact, (2) the City of Kuna and its area of city impact, (3) the City of Meridian and its area of city impact, (4) Garden City and its area of city impact, and (5) unincorporated areas of Ada County that fall within no area of city impact.

9. I included Garden City in the previous paragraph despite the fact that SUEZ currently has no customers in Garden City and no part of SUEZ's infrastructure lies within Garden City. I observe, however, that a tiny portion of Garden City lies within SUEZ's current certificated area, and the planning area simply follows that boundary.

10. I included the City of Meridian in the list in paragraph 8 because SUEZ currently serves customers in a tiny sliver of Meridian, which is included within SUEZ's current certificated area. The planning area simply retains this area.

DATED this 3rd day of April, 2018.

GIVENS PURSLEY LLP

By 
Roger D. Dittus

Subscribed and sworn to before me this 3rd day April, 2018.



Nancy L. Orcutt
Notary Public for Idaho
Residing at: Boise
My Commission Expires: June 12, 2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd 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.

DOCUMENT FILED:

IDAHO DEPARTMENT OF WATER RESOURCES
P.O. Box 83720
Boise, ID 83720-0098
Hand delivery or overnight mail:
322 East Front Street
Boise, ID 83702

<input type="checkbox"/>	U. S. Mail
<input checked="" type="checkbox"/>	Hand Delivered
<input type="checkbox"/>	Overnight Mail
<input type="checkbox"/>	Facsimile
<input type="checkbox"/>	E-mail

SERVICE COPIES TO PROTESTANTS, INTERVENORS, AND INTERESTED PARTIES:

Stephan L. Burgos
Director
Public Works Department
CITY OF BOISE
PO Box 500
Boise, ID 83701-0500
Facsimile: 208-433-5650
sburgos@cityofboise.org

<input type="checkbox"/>	U. S. Mail
<input type="checkbox"/>	Hand Delivered
<input type="checkbox"/>	Overnight Mail
<input type="checkbox"/>	Facsimile
<input checked="" type="checkbox"/>	E-mail

Hand delivery or overnight mail:
150 N Capitol Blvd, City Hall #1
Boise, ID 83702
(For the City of Boise, intervenor in support)

Abigale R. Germaine, Esq.
Assistant City Attorney
City Attorney's Office
CITY OF BOISE
PO Box 500
Boise, ID 83701-0500
Facsimile: 208-384-4454
agermaine@cityofboise.org

<input type="checkbox"/>	U. S. Mail
<input type="checkbox"/>	Hand Delivered
<input type="checkbox"/>	Overnight Mail
<input type="checkbox"/>	Facsimile
<input checked="" type="checkbox"/>	E-mail

Hand delivery or overnight mail:
150 N Capitol Blvd
Boise, ID 83702
(For the City of Boise, intervenor in support)

Chris M. Bromley, Esq.
McHugh Bromley PLLC
380 S 4th St, Ste 103
Boise, ID 83702
Facsimile: 208-287-0864
cbromley@mchughbromley.com
(For the City of Boise, intervenor in support)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

John Roldan, P.E.
Strategic Water Resources Manager
Public Works Department
CITY OF BOISE
PO Box 500
Boise, ID 83701-0500
Facsimile: 208-433-5650
jroldan@cityofboise.org
Hand delivery or overnight mail:
150 N Capitol Blvd
Boise, ID 83702
(For the City of Boise, intervenor in support)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Warren Stewart, P.E.
City Engineer
Public Works Department
CITY OF MERIDIAN
33 E Broadway Ave, Ste 200
Meridian, ID 83642
Facsimile: 208-898-9551
wstewart@meridiancity.org
(For the City of Meridian, intervenor in support)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Dale Bolthouse
Director
Public Works Department
CITY OF MERIDIAN
33 E Broadway Ave, Ste 200
Meridian, ID 83642
Facsimile: 208-898-9551
dbolthouse@meridiancity.org
(For the City of Meridian, intervenor in support)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Warren Stewart
Engineering Manager
Public Works Department
CITY OF MERIDIAN
33 E Broadway Ave, Ste 200
Meridian, ID 83642
Facsimile: 208-898-9551
dbolthouse@meridiancity.org
(For the City of Meridian, intervenor in support)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Kyle Radek, P.E.
Assistant City Engineer, Engineering Division
Public Works Department
CITY OF MERIDIAN
33 E Broadway Ave, Ste 200
Meridian, ID 83642
Facsimile: 208-898-9551
kradek@meridiancity.org
(For the City of Meridian, intervenor in support)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Garrick Nelson
Staff Engineer II
Public Works Department
CITY OF MERIDIAN
33 E Broadway Ave, Ste 200
Meridian, ID 83642
Facsimile: 208-898-9551
gnelson@meridiancity.org
(For the City of Meridian, intervenor in support)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Charles L. Honsinger, Esq.
HONSINGER LAW, PLLC
PO Box 517
Boise, ID 83701
Facsimile: 208-908-8065
honsingerlaw@gmail.com
(For the City of Meridian, intervenor in support)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Brent Orton, P.E., MSC
Public Works Director, City Engineer
CITY OF CALDWELL
621 East Cleveland Blvd.
Caldwell, ID 83605
Facsimile: 208-455-3012
borton@cityofcaldwell.org
(For the City of Caldwell, intervenor in support)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Christopher E. Yorgason, Esq.
Middleton City Attorney
YORGASON LAW OFFICES, PLLC
6200 N Meeker Pl
Boise, ID 83713
Facsimile: 208-375-3271
chris@yorgasonlaw.com
(For the City of Middleton, protestant)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Cherese D. McLain, Esq.
MOORE, SMITH, BUXTON & TURCKE, CHARTERED
950 W Bannock St, Ste 520
Boise, ID 83702
Facsimile: 208-331-1202
cdm@msbtlaw.com
(For the Star Sewer & Water District, intervenor in support, and for the City of Eagle, interested party)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

S. Bryce Farris, Esq.
Andrew J. Waldera, Esq.
SAWTOOTH LAW OFFICES, PLLC
PO Box 7985
Boise ID 83707
Facsimile: 208-629-7559
bryce@sawtoothlaw.com
andy@sawtoothlaw.com
Hand delivery or overnight mail:
1101 W River St, Ste 110
Boise ID 83702
(For Nampa & Meridian Irrigation District and Settlers Irrigation District, protestants)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Albert P. Barker, Esq.
Shelley M. Davis, Esq.
BARKER, ROSHOLT & SIMPSON, LLP
PO Box 2139
Boise, ID 83701-2139
Facsimile: 208-344-6034
apb@idahowaters.com
smd@idahowaters.com

Hand delivery or overnight mail:
1010 W Jefferson, Ste 102
Boise, ID 83702
*(For Boise Project Board of Control, Big Bend
Irrigation District, Boise-Kuna Irrigation District,
and Wilder Irrigation District, protestants)*

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Richard T. Roats, Esq.
City Attorney
CITY OF KUNA
PO Box 13
Kuna, ID 83634
Facsimile: 208-922-5989
rroats@kunaID.gov
kunaattorney@icloud.com
(For the City of Kuna, interested party)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Bob Bachman
Public Works Director
CITY OF KUNA
PO Box 13
Kuna, ID 83634
Facsimile: None
bbachman@kunaID.gov
Hand delivery or overnight mail:
6950 S Ten Mile Rd
Meridian, ID 83634
(For the City of Kuna, interested party)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

COURTESY COPIES TO IDWR AND OTHER NON-PARTIES:

James Cefalo
Hearing Officer
Eastern Regional Office
Idaho Department of Water Resources
900 North Skyline Dr., Ste. A
Idaho Falls ID 83402-6105
Facsimile: 208-525-7177
james.cefalo@idwr.idaho.gov

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Sharla Cox
Administrative Assistant
Eastern Regional Office
Idaho Department of Water Resources
900 North Skyline Dr., Ste. A
Idaho Falls ID 83402-6105
Facsimile: 208-525-7177
sharla.cox@idwr.idaho.gov

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Kimi White
Paralegal
IDAHO DEPARTMENT OF WATER RESOURCES
PO Box 83720
Boise, ID 83720-0098
Facsimile: 208-287-6700
kimi.white@idwr.idaho.gov
Hand delivery or overnight mail:
322 E Front St
Boise, ID 83702

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Garrick L. Baxter, Esq.
Deputy Attorney General
IDAHO DEPARTMENT OF WATER RESOURCES
PO Box 83720
Boise, ID 83720-0098
Facsimile: 208-287-6700
garrick.baxter@idwr.idaho.gov
Hand delivery or overnight mail:
322 E Front St
Boise, ID 83702

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Emmi Blades, Esq.
Deputy Attorney General
IDAHO DEPARTMENT OF WATER RESOURCES
PO Box 83720
Boise, ID 83720-0098
Facsimile: 208-287-6700
emmi.blades@idwr.idaho.gov

Hand delivery or overnight mail:
322 E Front St
Boise, ID 83702

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Nick Miller, P.E.
Manager
Western Regional Office
IDAHO DEPARTMENT OF WATER RESOURCES
2735 Airport Way
Boise, ID 83705-5082
Facsimile: 208-334-2348
nick.miller@idwr.idaho.gov

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Sarah A. Klahn, Esq.
White & Jankowski, LLP
511 Sixteenth St, Ste 500
Denver, CO 80202-4224
sarahk@white-jankowski.com
Facsimile: (303) 825-5632
(For the City of Pocatello, withdrawn)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Kathleen Marion Carr, Esq.
Office of the Field Solicitor
U.S. DEPARTMENT OF THE INTERIOR
960 Broadway Ave, Ste 400
Boise, ID 83706
Facsimile: 208-334-1918
kathleenmarion.carr@sol.doi.gov
(For the U.S. Bureau of Reclamation, withdrawn)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

E. Gail McGarry
Program Manager, Water Rights & Acquisitions
U.S. BUREAU OF RECLAMATION
Pacific Northwest Regional Office
1150 N Curtis Rd
Boise, ID 83706-1234
Facsimile: 208-378-5305
emcgarry@ usbr.gov
(For the U.S. Bureau of Reclamation, withdrawn)

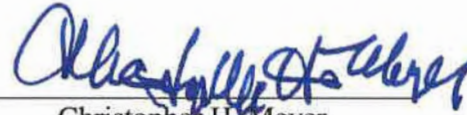
☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Matt J. Howard, Esq.
Water Rights Analyst
U.S. BUREAU OF RECLAMATION
Pacific Northwest Regional Office
1150 N Curtis Rd
Boise, ID 83706-1234
Facsimile: 208-378-5305
mhoward@ usbr.gov
(For the U.S. Bureau of Reclamation, withdrawn)

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail

Paul L. Arrington, Esq.
Director
Idaho Water Users Association
1010 W Jefferson St, Ste 101
Boise, ID 83702
Facsimile: 208-344-2744
paul@iwua.org

☐ U. S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile
☒ E-mail



Christopher H. Meyer