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**WATER RESOURCES
WESTERN REGION**

**BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES**

In the Matter of Integrated Municipal
Application Package ("IMAP") of United
Water Idaho Inc.

UWID'S INITIAL DISCLOSURES

Pursuant to the Hearing Officer's *Prehearing Order* of October 11, 2002, United Water Idaho Inc. ("UWID," the "Company," or the "Applicant") submits these *Initial Disclosures* to the parties in this matter.

I. THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH LAY WITNESS THE APPLICANT MAY CALL TO TESTIFY IN SUPPORT OF THE IMAP, AND A SUMMARY OF THEIR TESTIMONY

At this time, in order to make out its prima facie case, UWID intends to call the following lay witnesses:

A. Gregory P. Wyatt

Mr. Wyatt is President of United Water Idaho Inc. His address and telephone number are: 8248 W. Victory Road, Boise, ID 83707, 208-362-7325.

Mr. Wyatt's testimony will support and explain the IMAP, including information on how the IMAP was developed. Mr. Wyatt will provide a broad overview and history of UWID, as

well as information on its long term plans and expectations. In particular, he will discuss the nature and design of UWID's supply system, UWID's conservation programs, the relationship of UWID to other water supply entities in the region, the supply obligations of the Company as a regulated public utility, and the Company's planning efforts and how the IMAP fits into those efforts. Mr. Wyatt's testimony may also extend to any of the subjects identified for Mr. Rhead below.

B. H. Scott Rhead

Mr. Rhead is Director of Special Projects for United Water Idaho Inc. His address and telephone number are: 8248 W. Victory Road, Boise, ID 83707, 208-362-7325.

Mr. Rhead will testify about the process UWID has gone through in formulating the IMAP and the specific goals of the IMAP. Mr. Rhead's testimony will include an explanation of how UWID delineated the planning area described in the IMAP and the planning horizon identified in the IMAP. Mr. Rhead also will testify about UWID's current portfolio of water rights as described in the IMAP and the sources of supply the Company will look to in order to meet future anticipated demands. Mr. Rhead's testimony may also extend to any of the subjects identified for Mr. Wyatt above.

II. A COPY OF ALL DOCUMENTS, DATA COMPILATIONS, AND TANGIBLE THINGS THE APPLICANT MAY OFFER AS EVIDENCE IN SUPPORT OF THE IMAP

At this time, in order to make out its prima facie case, UWID intends to offer the following documents:

A. Integrated Municipal Application Package ("IMAP") (May 4, 2001, as amended March 20, 2002), including its Appendices

The IMAP is an extensive document with detailed explanations of the IMAP's foundation and purposes. It identifies each of the water rights involved, both as currently described and as proposed to be changed. It includes a detailed explanation of calculations made in developing

the reasonably anticipated future needs of the Company. Unlike typical water right applications, the IMAP constitutes a detailed roadmap through the Applicant's prima facie case.

We are not attaching a copy of the IMAP with these *Initial Disclosures*. The IMAP, including its appendices, is already a part of the record in this matter. To UWID's knowledge, all parties already have been provided a copy of the IMAP. Moreover, the IMAP is available on the Department's Internet site. Upon request, UWID will provide a copy of the IMAP to any party who does not have one.

B. *Municipal Service Area Description (MSAD) for United Water Idaho Inc. (October 21, 2002)*

This document contains the most recent description of UWID's service area as required under the Municipal Water Rights Act of 1996. This document was submitted by UWID to the Idaho Department of Water Resources on October 28, 2002.

It should be noted that the projections for future water demand contained in UWID's IMAP, are not premised upon this "service area." Rather, they are premised upon a "planning area" described in the IMAP. Consequently, the service area description is provided for background and informational purposes in order to assist the Department and the parties in understanding UWID's system and to understand how the service area relates to the planning area.

A copy of this document is included as an Appendix to these *Initial Disclosures*.

C. *Water for Tomorrow: The History, Results, and Projections of the Integrated Resource Plan (July 1997), together with Demand Forecast Technical Appendix*

As part of the future demand studies behind the IMAP, UWID discussed with other Western cities the planning strategies and planning horizons they have employed in projecting future water demand. The above-named document from the City of Denver is an example.

UWID is currently in the process of collecting additional materials from these and other Western cities summarizing these cities' planning processes. Additional documents will be provided as they are obtained by UWID.

A copy of this document is included as an Appendix to these *Initial Disclosures*.

D. *An Overview of United Water's "IMAP" Including an Explanation of the "Integrated Points of Diversion" Issue (July 15, 2002)*

This document was previously submitted to the Department. It contains further explanation of the functioning of UWID's system and how the IMAP would be implemented if approved. Appendix A to this document sets out a set of proposed conditions, which is no longer up to date. These conditions are the subject of continuing discussions with various Protestants. A new set of conditions is now in draft form, and is being explored in ongoing discussions with various Protestants. As soon it appears that the conditions have been settled upon, it will be submitted as part of the record.

A copy of this document is included as an Appendix to these *Initial Disclosures*.

III. THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH EXPERT WITNESS THE APPLICANT MAY CALL TO TESTIFY IN SUPPORT OF THE IMAP, ACCOMPANIED BY A WRITTEN REPORT PREPARED AND SIGNED BY THE WITNESS CONTAINING A COMPLETE STATEMENT OF ALL OPINIONS TO BE EXPRESSED AND THE BASIS AND REASONS THEREFORE

At this time, in order to make out its prima facie case, UWID expects to call the following expert witness:

A. John S. Church

Mr. Church is President of Idaho Economics, an economic consulting firm. Mr. Church's address and telephone number are: 6015 Poplar, Boise, ID 83711, 208-323-0732.

Mr. Church will testify in support of UWID's population projections within its planning area through the year 2050 and in support of UWID's projections by that population's demand

for municipal water. His opinions are summarized in Sections E.5 and E.6 in the IMAP. Appendix A of the IMAP contains the materials supporting Mr. Church's opinions. Additionally, UWID is including a certification signed by Mr. Church indicating that his opinions related to the IMAP are summarized in the IMAP and supported by the materials contained in Appendix A of the IMAP.

Mr. Church's resume and a copy of his report are included as appendices to these *Initial Disclosures*.

IV. ADDITIONAL WITNESSES AND DOCUMENTS

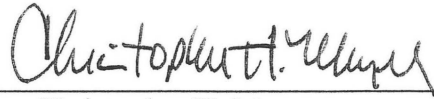
UWID reserves the right to identify other lay and expert witnesses, and to identify further documents and evidence, as may be required to respond to issues raised during the course of these proceedings.

For instance, at this time we do not anticipate a need for Mr. Wyatt or Mr. Rhead to be qualified as experts in order to make out UWID's prima facie case. However, in the course of discovery and the identification of issues by Protestants, it could become apparent that they will be required to provide expert testimony of some sort as well as the anticipated lay testimony described above.

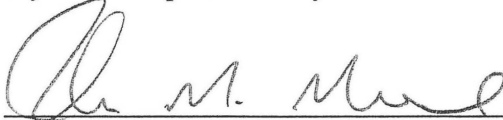
In any event, as additional witnesses, documents or other evidence are identified, they will be disclosed as soon as practicable. UWID also reserves the right to call rebuttal lay and expert witnesses as may be necessary to respond to the evidence presented by others at hearing.

DATED this 31st day of October, 2002.

GIVENS PURSLEY LLP



By: Christopher H. Meyer



By: John M. Marshall

*Attorneys for Applicant
United Water Idaho Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of October, 2002, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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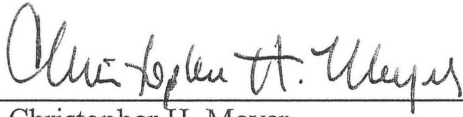
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2. *Water for Tomorrow: The History, Results, and Projections of the Integrated Resource Plan* (July 1997), together with *Demand Forecast Technical Appendix*.
3. *An Overview of United Water's "IMAP" Including an Explanation of the "Integrated Points of Diversion" Issue* (July 15, 2002).
4. Resume of John S. Church.
5. Report of John S. Church.