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IDAHO PUBLIC
UTILITIES COMMISSION

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IDAHO PUBLIC UTILITIES COMMISSION

DONALD SORRELLS, an individual,

Complainant,

vs.

SUNNYSIDE PARK UTILITIES, INC., an
Idaho Corporation,

Respondent.

Case No. GNR-U-22-03

SUPPLEMENTAL DECLARATION OF
DONALD D. SORRELLS IN SUPPORT OF
FORMAL COMPLAINT

I, Donald D. Sorrells, having first been duly sworn under oath, declare and testify as follows:

1. I am at over eighteen (18) years of age and am competent to testify in this matter;
2. I am the named Applicant in this matter, and my testimony is based upon my personal knowledge unless otherwise specified;
3. After filing my previous Declaration dated July 5, 2022, I have received

additional documentation and information to refute allegations made within the Respondent, Sunnyside Park Utilities, Inc.'s ("SPU") Amended Answer. These documents further demonstrate the ambiguous, inconsistent, and unestablished standards and policies exercised by SPU but not laid out within any written policies or water use agreement.

4. On or about August 15, 2022, I received an invoice for water and sewer service for the month of July. The total amount was the standard monthly rate of \$46.00. I paid the invoice on August 15, 2022 with a check, #7031.

5. On or about August 31, 2022, I received a second invoice for water and sewer service for the month of July. Again, the amount on the invoice was the standard monthly \$46.00 rate. I understood this invoice to have been resent in error, as I had already paid the entirety of the July expenses on August 15, 2022. A true and correct copy of the August 31, 2022 Invoice is included with this declaration as Exhibit A.

6. On or about September 7, 2022, I received an accounting Statement from SPU identifying what it purported to be amounts owing on my account. A true and correct copy of the September 7, 2022 Statement (the "Statement") is included with this declaration as Exhibit B.

7. There are numerous discrepancies, inaccuracies, and errors on the Statement, and the amounts alleged owing do not appear to be consistent with any published rates, policies, or written agreements with SPU. The following issues are present in the Statement that I believe to be improperly raised by SPU:

a. October 31, 2021. I received an invoice for water and sewer services

with an excess water charge totaling \$46.67. I paid the \$46.67 with a check, Pmt. #60533. SPU subsequently and without explanation changed the fees from \$46.67 to \$48.48.

- b. October 31, 2021. I received an invoice charging \$653.49 for an alleged "Service Call". I received no explanation as to what this alleged charge was for or what the alleged "service call" was. Further, SPU has given no basis or explanation of rates to show how they value such "service calls". It is my understanding that no service call was made by SPU on the property at issue during the month of October, or any other month since I have owned or occupied the property. This amount has not been paid as there is no basis for it being assessed against me under any policy, rule, or agreement with SPU.
- c. May 31, 2022. I received two invoices, Nos. 3500 and 3517. Invoice #3500 was for water and sewer services at the standard monthly rate of \$46.00. Invoice #3517 charged \$7,024.24. This exorbitant amount included \$5,417.50 for an alleged one hundred and ninety-seven "water meter checks" without any explanation of when the alleged meter checks occurred, what the meter readings were, and the basis for charging meter checks. Additionally, the Invoice sought \$850.00 for 10 instances of non-descript "Account management" by Doyle Beck. There is no explanation for these charges and no water

use agreement has been signed which allows for the assessment of such charges. As of today's date, I have paid the \$46.00 owing per invoice #3500 with a check, #7042. I have not paid the unwarranted \$7,024.24 in miscellaneous attorneys fees and account management.

- d. August 31, 2022. The Statement included the amount charged under the re-sent invoice previously identified in paragraph 5 above. As explained, this amount had already been paid, and the remaining fee is in error.

8. On or about September 26, 2022, I received an invoice from SPU for \$22,642.62. The invoice included \$20,965.12 in alleged "Legal Fees" and \$1,677.50 for 61 water meter checks. There is no explanation for these charges and no water use agreement has been signed which allows for the assessment of such charges or identifies applicable rates. Further, there is no explanation of when the alleged water meter checks were performed. A true and correct copy of the September 26, 2022 invoice is included with this declaration as Exhibit C.

9. The water meter at issue in this matter was installed on or about July 29, 2021. According to the Statement and invoices I have received, SPU alleges that it has performed approximately two hundred and fifty-eight water meter checks on the subject water meter within a span of only 18 months. In my opinion, it strains credulity to think that these water meter checks were necessary, reasonable, or, frankly, even occurred, at least at the rate and frequency indicated within the Statement and

invoices. I have been consistently and continuously accosted with inexplicable and unfounded fees and charges, which I believe are designed purely to frustrate or harass me.

I, Donald D. Sorrells, hereby declare in accordance with Idaho Code section 9-1406 that the foregoing statements are true and correct to the best of my knowledge.

DATED: October 13, 2022.

/s/ Donald Sorrells
Donald D. Sorrells

Sunnyside Utilities Inc
P.O. Box 1768
Idaho Falls, ID 83403-1768
208-529-9891

Invoice

Date	Invoice #
9/26/2022	3576

Bill To
Donald Sorrells 3341 N Emperor Ave. Fresno, CA 93737

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
1	LEGAL FEES 11/30/21	2,433.74	2,433.74
1	LEGAL FEES 12/31/21	1,496.25	1,496.25
1	LEGAL FEES 01/31/22	3,150.00	3,150.00
1	LEGAL FEES 04/04/22	6,243.75	6,243.75
1	LEGAL FEES 04/30/22	4,611.39	4,611.39
1	LEGAL FEES 05/31/22	1,642.50	1,642.50
1	LEGAL FEES 06/30/22	425.00	425.00
1	LEGAL FEES 07/31/22	962.50	962.50
61	WATER METER CHECK \$55.00 HR @.50 TO 09/23/22	27.50	1,677.50
		Total	\$22,642.63

Exhibit A

Sunnyside Utilities Inc
P.O. Box 1768
Idaho Falls, ID 83403-1768
208-529-9891

Statement

Date
9/7/2022

To:
Donald Sorrells 3341 N Emperor Ave. Fresno, CA 93737

		Amount Due	Amount Enc.
		\$7,070.24	
Date	Transaction	Amount	Balance
12/31/2020	Balance forward		46.00
01/31/2021	INV #3162. Due 01/31/2021.	46.00	92.00
	--- H2O \$22.00		
	--- SWR \$24.00		

	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park		
02/11/2021	PMT #60438.	-46.00	46.00
02/26/2021	PMT #60447.	-46.00	0.00
02/28/2021	INV #3182. Due 02/28/2021.	46.00	46.00
	--- H2O \$22.00		
	--- SWR \$24.00		

	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park		
03/30/2021	PMT #60457.	-46.00	0.00
03/31/2021	INV #3202. Due 03/31/2021.	46.00	46.00
	--- H2O \$22.00		
	--- SWR \$24.00		

	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park		
04/28/2021	PMT #60471.	-46.00	0.00
04/30/2021	INV #3224. Due 04/30/2021.	46.00	46.00
	--- H2O \$22.00		
	--- SWR \$24.00		

	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park		
05/19/2021	PMT #60476.	-46.00	0.00
05/31/2021	INV #3244. Due 05/31/2021.	46.00	46.00
	--- H2O \$22.00		
	--- SWR \$24.00		

	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park		
CURRENT			Amount Due
1-30 DAYS PAST DUE			
31-60 DAYS PAST DUE			
61-90 DAYS PAST DUE			
OVER 90 DAYS PAST DUE			
0.00	46.00	0.00	0.00
			7,024.24
			\$7,070.24

Sunnyside Utilities Inc
P.O. Box 1768
Idaho Falls, ID 83403-1768
208-529-9891

Statement

Date
9/7/2022

To:
Donald Sorrells 3341 N Emperor Ave. Fresno, CA 93737

		Amount Due	Amount Enc.
		\$7,070.24	
Date	Transaction	Amount	Balance
06/30/2021	INV #3264. Due 06/30/2021. --- H2O \$22.00 --- SWR \$24.00 ---	46.00	92.00
07/06/2021	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park PMT #60484.	-46.00	46.00
07/23/2021	PMT #3337.	-46.00	0.00
07/31/2021	INV #3284. Due 07/31/2021. --- H2O \$22.00 --- SWR \$24.00 --- H2O Excess \$0.00 --- Block 4 Lot 4 Sunnyside Industrial and Professional Park PMT #60504.	46.00	46.00
08/27/2021	INV #3304. Due 08/31/2021. --- H2O \$22.00 --- SWR \$24.00 ---	-46.00	0.00
08/31/2021	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park PMT #60511.	46.00	46.00
09/28/2021	INV #3324. Due 09/30/2021. --- H2O \$22.00 --- SWR \$24.00 ---	-46.00	0.00
09/30/2021	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park PMT #60516.	46.00	46.00
10/14/2021	INV #3342. Due 10/31/2021. --- H2O \$22.00 --- SWR \$24.00 --- H2O Excess 3.7 @ \$0.67 = 2.48 --- Block 4 Lot 4 Sunnyside Industrial and Professional Park PMT #60533.	-46.00	0.00
10/31/2021		701.97	701.97
11/19/2021	Service Call \$653.49	-46.67	655.30

CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
0.00	46.00	0.00	0.00	7,024.24	\$7,070.24

Statement

Sunnyside Utilities Inc
 P.O. Box 1768
 Idaho Falls, ID 83403-1768
 208-529-9891

Date
9/7/2022

To:
Donald Sorrells 3341 N Emperor Ave. Fresno, CA 93737

		Amount Due	Amount Enc.		
		\$7,070.24			
Date	Transaction	Amount	Balance		
11/30/2021	INV #3364. Due 11/30/2021. --- H2O \$22.00 --- SWR \$24.00 --- H2O Excess, 0.66 @ \$0.67 = 0.44 <i>pd</i>	46.44	701.74		
12/31/2021	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park INV #3384. Due 12/31/2021. --- H2O \$22.00 --- SWR \$24.00 --- <i>pd</i>	-46.00	747.74		
01/07/2022	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park PMT #60556.	-46.44	701.30		
01/26/2022	PMT #60574.	-46.00	655.30		
01/31/2022	INV #3405. Due 01/31/2022. --- H2O \$22.00 --- SWR \$24.00 --- <i>pd</i>	46.00	701.30		
02/23/2022	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park PMT #60592.	-46.00	655.30		
02/28/2022	INV #3426. Due 02/28/2022. --- H2O \$22.00 --- SWR \$24.00 --- <i>pd</i>	46.00	701.30		
03/25/2022	--- Block 4 Lot 4 Sunnyside Industrial and Professional Park PMT #60610.	-46.00	655.30		
03/31/2022	INV #3444. Due 03/31/2022. --- H2O \$22.00 --- SWR \$24.00 --- <i>pd</i>	54.29	709.59		
04/26/2022	--- H2O Excess, 12.38 @ \$0.67 = 8.29 --- Block 4 Lot 4 Sunnyside Industrial and Professional Park PMT #99009. <i>pd</i>	-54.29	655.30		
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
0.00	46.00	0.00	0.00	7,024.24	\$7,070.24

Statement

Sunnyside Utilities Inc
 P.O. Box 1768
 Idaho Falls, ID 83403-1768
 208-529-9891

Date
9/7/2022

To:
Donald Sorrells 3341 N Emperor Ave. Fresno, CA 93737

Amount Due	Amount Enc.
\$7,070.24	

Date	Transaction	Amount	Balance
04/30/2022	INV #3463. Due 04/30/2022. --- H2O \$22.00 --- SWR \$24.00 --- H2O Excess, 14.09 @ \$0.67 = 9.44 --- Block 4 Lot 4 Sunnyside Industrial and Professional Park	55.44	710.74
05/31/2022	INV #3500. Due 05/31/2022. --- H2O \$22.00 --- SWR \$24.00 --- H2O Excess \$0.00 --- Block 4 Lot 4 Sunnyside Industrial and Professional Park	46.00	756.74
05/31/2022	INV #3517. Due 05/31/2022. --- Misc., 197 @ \$27.50 = 5,417.50 --- Misc., 10 @ \$85.00 = 850.00	6,267.50	7,024.24
06/30/2022	INV #3521. Due 06/30/2022. --- H2O \$22.00 --- SWR \$24.00 --- Block 4 Lot 4 Sunnyside Industrial and Professional Park	46.00	7,070.24
07/19/2022	PMT #7025.	-46.00	7,024.24
07/31/2022	INV #3540. Due 07/31/2022. --- H2O \$22.00 --- SWR \$24.00 --- Block 4 Lot 4 Sunnyside Industrial and Professional Park	46.00	7,070.24
08/26/2022	PMT #7032.	-46.00	7,024.24
08/31/2022	INV #3559. Due 08/31/2022. --- H2O \$22.00 --- SWR \$24.00 --- Block 4 Lot 4 Sunnyside Industrial and Professional Park --- 147771-152703	46.00	7,070.24

CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
0.00	46.00	0.00	0.00	7,024.24	\$7,070.24

MISSING PMTS.

Exhibit B

Sunnyside Utilities Inc

P.O. Box 1768
Idaho Falls, ID 83403-1768
208-529-9891

Invoice

Date	Invoice #
8/31/2022	3559

Bill To
Donald Sorrells 3341 N Emperor Ave. Fresno, CA 93737

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
	Water Service	22.00	22.00
	Sewer Service	24.00	24.00
	Block 4 Lot 4 Sunnyside Industrial and Professional Park 147771-152703		
<i>THIS INVOICE PAID 8/15/22 CHK # 7031 \$46.00 RE SENT INVOICE 8/31</i>			
Total			\$46.00

Exhibit C