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ATTORNEY FOR RESPONDENT

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

DONALD SORRELLS,)	Case No. GNR-U-22-03
)	
Complainant,)	
)	
v.)	MOTION TO AMEND ANSWER
)	
)	
SUNNYSIDE PARK UTILITIES,)	
INC.,)	
)	
Respondent.)	
_____)	

COMES NOW the Respondent, Sunnyside Park Utilities, Inc. (hereafter "SPU") by its counsel of record, Paul L. Fuller, pursuant to IPUC Rule 66, and requests permission for SPU to amend its Answer in the above-entitled action based upon a significant change in the status of SPU, specifically to establish the conversion of SPU from a general corporation to a non-profit corporation since the filing of the original Answer, and to provide the Commission with the documents evidencing that non-profit status. Such conversion directly affects the Commission's continuing jurisdiction over SPU under applicable Idaho statutes.

Idaho Code Section 61-104 provides: "The term "corporation" ... does not include ... mutual nonprofit or cooperative ... water ... corporation or any other public utility organized for service at costs or not for profit..." A copy of the proposed Amended Answer is submitted with this Motion.

DATED this 7th day of September, 2022.

/s/ Paul L. Fuller
Paul L. Fuller
Attorney for Sunnyside Park Utilities, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served a true and correct copy of the following described pleading or document on the persons listed below on this 7th day of September, 2022:

Document Served:

MOTION TO AMEND ANSWER

Persons Served:

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/s/ Paul L. Fuller
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