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ATTORNEY FOR RESPONDENT

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

DONALD SORRELLS,)	Case No. GNR-U-22-03
)	
Complainant,)	
)	
v.)	PETITION FOR REVIEW OF
)	INTERLOCUTORY ORDER AND
)	PETITION FOR STAY AND
SUNNYSIDE PARK UTILITIES,)	PETITION TO DESIGNATE ORDER
INC.,)	AS FINAL
)	
Respondent.)	
_____)	

COMES NOW the Respondent, Sunnyside Park Utilities, Inc. ("SPU"), by its counsel of record, Paul L. Fuller, pursuant to IPUC Rule 322, and petitions the IPUC to review interlocutory Order No. 35645.¹ This Petition also includes a Petition to Stay Order No. 35645 under IPUC Rule 324 and a Petition to Designate Order as Final under IPUC Rule 323. This Petition is based upon the arguments, contained herein, documents previously filed with the IPUC, the Request for a Regulatory Taking Analysis filed

¹ Although Order No. 35645 is a review of Order No. 35513, it was not designated a Final Order under IPUC Rule 323.

herewith, and the Second Declaration of Doyle Beck, submitted herewith.

ARGUMENT

In Order No. 35645, the Idaho Public Utilities Commission ("IPUC") properly ignored the "Staff Criteria", as an improper attempt to extend IPUC's jurisdiction which was not justified under the limited jurisdiction delegated to the IPUC by the Idaho Legislature. However, IPUC improperly determined that SPU is both a "corporation" and a "water corporation" under applicable Idaho statutes and case law, in order to allow IPUC to exercise jurisdiction over SPU. For the following reasons, IPUC is in error in its analysis of Idaho statutes and case law, and is without jurisdiction over SPU.

1. Idaho Code § 61-104 - The Absence of Evidence is not Evidence.

In Order No. 35645, IPUC asserts that it has authority to exercise jurisdiction over SPU based upon a lack of evidence that SPU is "operated" for service at cost and not for profit. Specifically, Order 35645 states as follows:

Based upon the lack of evidence in the record concerning the operating cost of the Company, the Commission cannot find that the Company is exempt from Commission regulation under *Idaho Code* § 61-104 as both organized, and operated, for service at cost and not for profit.

See Order No. 35645, p. 7. IPUC makes a **presumption** that the lack of evidence that SPU is "operated" for service at cost and not for

profit justifies IPUC's jurisdiction over SPU. IPUC's analysis contradicts many years of Idaho Supreme Court rulings, which the IPUC is without authority to ignore.

The Idaho Supreme Court has repeatedly stated that "[t]he Idaho Public Utilities Commission has no authority other than that granted to it by the legislature. It exercises a limited jurisdiction, and **nothing is presumed in favor of its jurisdiction.**" *Miles v. Idaho Power Co.*, 116 Idaho 635, 644, 778 P.2d 757 (1989) (emphasis added); see also *Idaho State Homebuilders v. Washington Water Power*, 107 Idaho 415, 418, 690 P.2d 350, 353 (1984); *Washington Water Power Co. v. Kootenai Environmental Alliance*, 99 Idaho 875, 591 P.2d 122 (1979); *United States v. Utah Power & Light Co.*, 98 Idaho 665, 570 P.2d 1353 (1977); *Lemhi Tel. Co. v. Mountain States Tel. & Tel. Co.*, 98 Idaho 692, 571 P.2d 753 (1977); *Arrow Transp. Co. v. Idaho Public Utilities Comm'n*, 85 Idaho 307, 379 P.2d 422 (1963).

The Idaho Supreme Court has also stated as follows with regard to the IPUC:

As a general rule, administrative authorities are tribunals of limited jurisdiction and their jurisdiction is dependent entirely upon the statutes reposing power in them and they cannot confer it upon themselves, although they may determine whether they have it. If the provisions of the statutes are not met and compliance is not had with the statutes, **no jurisdiction exists.** *Arrow Transp. Co. v. Idaho Public Utilities Comm'n*, *supra*.

Washington Water Power Co. v. Kootenai Environmental Alliance, 99

Idaho 875, 879, 591 P.2d 122 (1979) (emphasis added). If jurisdiction is not conclusively established under the statute, jurisdiction does not exist by default.

As noted in Order No. 35645, no evidence is in the record establishing whether SPU is "operated" at cost and without profit. Based upon this complete lack of evidence, the IPUC presumes that SPU **is** operating for profit in order to justify exercising jurisdiction over SPU. Such presumption is in direct violation of Idaho case law, and further presumes without evidence that SPU is acting in violation of Idaho's Nonprofit Corporation Act.

IPUC's presumption that SPU is operating in violation of Idaho Code Section 30-30-904 is contrary to the basic Constitutional Due Process requirement of a presumption of innocence. The U.S. Supreme Court has stated that the "presumption of innocence, although not articulated in the Constitution, is a basic component of a fair trial under our system of criminal justice." *Estelle v. Williams*, 425 U.S. 501, 503, 96 S.Ct. 1691 1692, 48 L.Ed.2d 126, 130 (1976); see also *State v. Baeza*, 161 Idaho 38, 40, 383 P.3d 1208 (2016).

Central to the right to a fair trial, guaranteed by the Sixth and Fourteenth Amendments, is the principle that "one accused of a crime is entitled to have his guilt or innocence determined solely on the basis of the evidence introduced at trial, and **not on grounds of official suspicion**, indictment, continued custody, or other circumstances not adduced as proof at trial.

Holbrook v. Flynn, 475 U.S. 560, 567, 106 S.Ct. 1340 1345, 89

L.Ed.2d 525, 533-34 (1986) (emphasis added); quoting *Taylor v. Kentucky*, 436 U.S. 478, 485, 98 S.Ct. 1930 1934, 56 L.Ed.2d 468, 474-75 (1978); see also *Baeza*, 161 Idaho at 40-41. Making a determination of guilt based upon an admitted lack of proof, is nothing short of a Due Process violation. "The legislature [and by extension, administrative agencies] may not enact directly that a defendant shall be deprived of the presumption of his innocence and required to assume the burden of proving that a crime has not been committed, or that he was not connected therewith." *On Rehearing*, 33 Idaho 218, 219-20 (1920). The State of Idaho, and its agency, the IPUC, have no authority to presume SPU is violating Idaho's Nonprofit Corporation Act or to act based upon "official suspicion" of a violation.

IPUC is taking the position that the burden is on SPU to establish IPUC's lack of jurisdiction, when the Idaho Supreme Court has made clear that the burden is on the IPUC (or in this case, arguably the Complainant)² to establish IPUC has jurisdiction. Nothing is presumed in favor of jurisdiction. The complete absence of evidence establishing IPUC jurisdiction necessarily means IPUC lacks jurisdiction. The Idaho Supreme Court is clear that until statutory compliance has been met establishing

² See *Steele v. City of Shelley*, 151 Idaho 289, 255 P.3d 1175 (2011): "Once jurisdiction has been called into question, the party **asserting** jurisdiction has the burden of proving jurisdictional facts. *Schneider v. Sverdsten Logging Co.*, 104 Idaho 210, 214 n. 2, 657 P.2d 1078, 1082 n. 2 (1983) (emphasis added); citing *Taylor v. Portland Paramount Corp.*, 383 F.2d 634, 639 (9th Cir.1967)" *Steele*, 151 Idaho at 294.

jurisdiction, no jurisdiction exists.

The IPUC's interpretation of Section 61-104 would subject **all** non-profits to IPUC jurisdiction upon their initial formation or conversion. IPUC's interpretation would require **all** non-profits to apply for Certificates of Convenience and Necessity when constructing water systems, because by definition, no evidence of operational cost or history of distributions can exist until **after** such system becomes operational. Such universal presumption in favor of jurisdiction is not consistent with Idaho case law, and would effectively destroy the non-profit exemption identified in Idaho Code Section 61-104. If IPUC requires definitive evidence that an entity is "operated" as a non-profit in order to **prevent** jurisdiction (as opposed to requiring such evidence by a complainant to **exercise** jurisdiction), IPUC is necessarily interpreting the statute to grant IPUC jurisdiction over all non-profits upon incorporation or conversion, with continuing jurisdiction until such time that IPUC is satisfied that the entity is operated as a non-profit, which may take months or years to develop. The IPUC has not identified any basis to presume jurisdiction by default over all newly formed or converted non-profit entities.

Based upon Order No. 35645, the IPUC recognizes that there is no evidence to establish that SPU "operates" for profit. Until it is established that SPU is operating for profit, SPU is not a

"Corporation" under Section 61-104. Until jurisdiction is conclusively established, no jurisdiction exists. IPUC must decline to exercise jurisdiction based upon its own acknowledgement that no evidence exists establishing jurisdiction.

2. Idaho Code § 61-125 cannot be Ignored.

SPU disagrees with IPUC's attempt to overturn or distinguish *Stoehr v. The Natatorium Co.*, 34 Idaho 217, 200 P. 132 (1921). Members of the IPUC have not been appointed or elected to the Idaho Supreme Court. Only that Supreme Court may decide whether "*Stoehr* remains good law." See Order No. 35645, p. 8. Until the Supreme Court reverses the *Stoehr* holding, the oaths of office taken by the members of the Commission require that the *Stoehr* holding be obeyed. This fact has been recognized by the Idaho Industrial Commission, which held that "it is not the role of this Commission to overrule Idaho Supreme Court decisions. Only the Court itself has that prerogative." See *Jackman*, 090294 IDWC, 86-552345 (Idaho Industrial Commission Decisions, 1994).³

Stoehr is clear that there are problematic constitutional concerns if all corporations which provide water for compensation are deemed "water corporations". *Id.* at 221. *Verska v. Saint Alphonsus Reg'l Med. Ctr.*, 151 Idaho 889, 265 P.3d 502 (2011), addresses statutory construction as it relates to legislative intent, but nothing in *Verska* limits the Court's ability to

³ A copy of this decision can be provided to IPUC upon request.

address the constitutionality of statutory interpretations, or to recognize common law elements where necessary to prevent constitutional violations. If *Verska* overturned the *Stoehr* Court's decision that there must be "unequivocal intent to dedicate itself to public use", then the question regarding the constitutionality of Idaho Code Section 61-125 identified in *Stoehr* must now be addressed. A clear reading of *Stoehr* establishes that if the "unequivocal intent" requirement was not imposed, then Idaho Code Section 61-125 is unconstitutional. As stated in *Stoehr*, the IPUC must not "fail to appreciate and respect constitutional limitations." *Stoehr*, 34 Idaho at 221.

Stoehr has been cited approvingly in the following non-exclusive list of cases:

- a. *Coastal States Gas Transmission Co., Inc. v. Alabama Public Service Com'n*, 524 So.2d 357, 362 (Ala. 1988): "...to fall into the class of a public utility, a business or enterprise must be impressed with a public interest and that those engaged in the conduct thereof must hold themselves out as serving or ready to serve all members of the public, who may require it, to the extent of their capacity."
- b. *Grever v. Idaho Telephone Co.*, 499 P.2d 1256, 94 Idaho 900 (1972): "A corporation becomes subject to regulation by the Idaho Public Utilities Commission as a public utility when the business of the corporation becomes devoted to public use or when it holds itself out as ready, able and willing to serve the public or some portion of the public."
- c. *Public Utilities Commission of State of Idaho v. Natatorium Co.*, 36 Idaho 287, 211 P. 533 (1922): In a secondary action to *Stoehr*, involving an attempt by the IPUC to exercise jurisdiction over The Natatorium, which conveyed water to 276 users, the Supreme Court again declared that the Natatorium was not a public utility.

"The water being private water, it was private property and could not be impressed with a public use and subjected to the jurisdiction of the commission without the consent of [The Natatorium], express or implied, **for to so hold would be in effect to take its property without due process of law.**" *Id.* at 291 (emphasis added).

- d. *Borough of Ambridge v. P. S. C.*, 108 Pa.Super. 298, 165 A. 47 (Pa. Super. Ct. 1933).
- e. *Rural Electric Co. v. State Board of Equalization*, 57 Wyo. 451, 120 P.2d 741 (Wyo. 1942).
- f. *Inland Empire Rural Electrification, Inc. v. Department of Public Service of Washington*, 199 Wash. 527, 92 P.2d 258 (Wash. 1939).

Stoehr remains good law. The IPUC's attempt to distinguish or overturn *Stoehr*, ignores the Constitutional Due Process violation issues which the *Stoehr* and *Natatorium* Courts were explicitly attempting to avoid. At no time has the Idaho Supreme Court overturned *Stoehr's* or *Natatorium's* requirement that there must be a dedication to public use for a water corporation to be regulated by the IPUC. Such common-law requirement is recognition that to hold otherwise would render Section 61-125 constitutionally invalid, which the Supreme Court refused to declare. SPU submits herewith a Request for Regulatory Taking Analysis, based upon the Supreme Court recognition in *Natatorium* that IPUC exercising jurisdiction over a water corporation, where no public dedication has occurred, constitutes a taking and due process violation. See *Natatorium*, 36 Idaho at 291. The filing of this request tolls any deadline imposed by the IPUC in this proceeding until a response to such request is provided by the IPUC. See Idaho Code Section

67-8003(4).

In *Public Utilities Commission of State of Idaho v. Natatorium Co.*, 36 Idaho 287, 211 P. 533 (1922), providing water to 276 customers was **not** deemed to be a public dedication of a water company. In that action, the Supreme Court held that "the mere fact of distribution or the receiving of compensation for the use thereof, in the absence of an unequivocal intention to dedicate to a public use, would not be such a use as would make the [Natatorium] a public service corporation." *Id.* at 306.

The mere fact that SPU distributes to and receives compensation from 19 customers does not make SPU a public service corporation. IPUC's secondary argument regarding *Stoehr's* holding, found on Page 9 of Order No. 35645, directly contradicts the Supreme Court's decision in *Natatorium*, where the IPUC was attempting to assert jurisdiction over an entity which served 276 customers. *Public Utilities Commission of State of Idaho v. Natatorium Co.*, 36 Idaho 287, 211 P. 533 (1922), has cited approvingly in the following non-exclusive list of cases:

- a. *Baker v. Ore-Ida Foods, Inc.*, 95 Idaho 575, 513 P.2d 627 (1973).
- b. *Maher v. Gentry*, 67 Idaho 559, 186 P.2d 870 (1947).
- c. *Jones v. McIntire*, 60 Idaho 338, 91 P.2d 373 (1939).
- d. *Hall v. Taylor*, 57 Idaho 662, 67 P.2d 901 (1937).
- e. *Washington County Irrigation District v. Talboy*, 55

Idaho 382, 43 P.2d 943 (1935).

f. *Codd v. McGoldrick Lumber Co.*, 48 Idaho 1, 279 P. 298 (1929).

g. *Humbird Lumber Co. v. Public Utilities Commission*, 39 Idaho 505, 228 P. 271 (1924).

After citing to the *Stoehr* case, the Supreme Court in *Humbird Lumber Co. v. Public Utilities Commission*, 39 Idaho 505, 228 P. 271 (1924), stated that "[t]he test for determining whether the lumber company is a public utility would seem to depend upon whether it has held itself out as ready, able and willing to serve the public generally, or some portion thereof." *Id.* at 513. Although SPU serves various customers within a specific subdivision, SPU has never held itself out as ready, able and willing to serve all members of the public or even all members of the subdivision. See Second Declaration of Doyle Beck, para. 3. Each customer was required to request service, and service is only provided to those customers individually approved by SPU.⁴ *Id.* at para. 4. SPU has refused service to owners of lots within the subdivision where the owner's demands exceeded system capacity. *Id.* at para. 4. Nearly half of the subdivision is **not** served by SPU. See First Declaration of Doyle Beck, para. 4. No evidence has been presented that SPU has unequivocally stated that it is ready,

⁴ For example, a "Will Serve" letter was issued to Complainant, and is attached as Exhibit H to the Amended Answer.

able and willing to serve all members of the public or all members of the subdivision. SPU only serves customers on a case-by-case basis. See Second Declaration of Doyle Beck, para. 4.

Idaho case law is clear that the mere conveyance of well water to customers does not create a public utility without **unequivocal** dedication to the public, even where well water is conveyed to 276 customers. The record contains no evidence that SPU has made such an unequivocal dedication to the public or any part thereof. SPU will not consent to such a dedication being presumed. SPU's conveyance to 19 customers on a case-by-case basis clearly does not meet the requirements of intent to create a public utility.

3. IMPACT ON THIRD PARTY BENEFICIARY AGREEMENT.

Staff Comments submitted May 12, 2022, recognized that the Third Party Beneficiary Agreement provides SPU's customers "significant control over the rates SPU charges." See Staff Comments, May 12, 2022, p. 4. A review of the Third Party Beneficiary Agreement, attached as Exhibit 'G' to SPU's Amended Answer, establishes that should IPUC exercise jurisdiction over SPU, IPUC's regulation would remove this significant control exercised by SPU's customers. In Section 12 of the Agreement, p. 6-7, the Third Party Agreement will terminate if "the rates, services and operation of the Company are placed by law under the jurisdiction of a regulatory commission or other governmental

agency or body empowered to fix rates...” Given that the Third Party Beneficiary Agreement applies to both the water and sewer service, IPUC jurisdiction would result in customers losing their significant control over rate setting for both water and sewer service.

Ironically, the IPUC’s exercise of jurisdiction may have exactly the opposite effect from what is desired. SPU’s customers would never be able to petition the IPUC regarding SPU’s rates or charges, because under Idaho Code Section 61-612, IPUC will not entertain any complaint regarding rates or charges unless a minimum of 25 customers sign the complaint.⁵ Where SPU only has 19 customers, they would never meet the minimum statutory threshold to pursue an IPUC complaint. By exercising jurisdiction over SPU, IPUC is effectively removing all protection the customers now have with regards to rates and charges set by SPU.

4. IMPROPER ORDER REQUIREMENT.

Under Order No. 35645, SPU is ordered to file an Application for a “CPCN” to become a regulated water company within 30-days of issuance of the Order. Certificates of Convenience and Necessity are governed by Idaho Code Section 61-526.⁶ Section 61-526

⁵ The fact that there is a 25 person minimum to file a complaint to the IPUC is *prima facie* evidence that it was never the Legislative intent for IPUC to regulate small private water providers.

⁶ Section 61-527 is inapplicable because that provision relates solely to utilities holding municipal or county rights or franchises. SPU does not possess any water distribution rights or franchise from a county or municipality. See *Clearwater Power Co. v. Washington Water Power Co.*, 78

prohibits "the **construction** of a ... system or of any **extension** of such ... system, without having first obtained from the commission a certificate that the present or future public convenience and necessity require or will require **such construction...**" (Emphasis added). However, SPU has no current intention of constructing or expanding its water system. It is clear that the IPUC treats Certificates of Convenience and Necessity as licenses to operate a utility⁷, where the Idaho Code clearly treats such Certificates as a preconstruction building permit.

This is further underscored by IPUC Rules 111 and 112, which identify the form and content required when making an application for a Certificate of Convenience and Necessity. Whether a new system is being created, or an existing system is expanding, both Rules require applicants to produce various items related to proposed construction or proposed expansion of the system. SPU can find no Idaho Statute or IPUC Rule which allows the IPUC to order that an existing system apply for a Certificate to continue its current operation, effectively mandating consent to be regulated. Because SPU has no intention of building or expanding its system, IPUC's Order to apply for a Certificate is improper and should be withdrawn.

Ordering SPU to apply for a certificate to build or expand

Idaho 150, 152, 299 P.2d 484 (1956).

⁷ See Order No. 35645 where IPUC orders SPU to apply for a "CPCN to become a regulated water company..." Order No. 35645, p. 10.

its system, where no building or expansion is contemplated, is an abuse of any authority IPUC may have over SPU. Idaho Code and the IPUC Rules do not recognize Certificates of Convenience and Necessity as a means by which an existing utility provider applies for regulation by the IPUC. It would be an absurd reading of the law to require any company establish that the service **already** provided to its customers is both convenient and necessary. If the company's service was not convenient or necessary, the customers would have found more convenient water sources or would not have requested service. Any attempt to now require application for a Certificate of Convenience and Necessity, or to impose a penalty or fine against SPU, for the construction of its system over twenty years ago, would be barred by applicable statutes of limitation and will be reversed on appeal.

5. ADDITIONAL EVIDENCE FOR CONSIDERATION.

Should the IPUC refuse to reconsider Order No. 35645 based upon the above stated arguments, submitted herewith, is the Second Declaration of Doyle Beck, providing evidentiary testimony establishing that SPU is both organized and operated at cost and not for profit. Mr. Beck provides this evidence to establish that SPU is a lawfully operated nonprofit. Because the conversion is recent, the financial statements, cost analysis, and/or tax information identified by IPUC (see Order No. 35645, p. 7) as potentially establishing SPU's non-profit operating status simply

do not exist. It is requested that this additional information be taken into consideration during IPUC's review of Order No. 35645.

Dr. Phil McGraw often states that "the best predictor of future behavior is past behavior." This maxim has been acknowledged by the Idaho Court of Appeals in *Doe v. State, Dept. of Health and Welfare*, 123 Idaho 502, 506, 849 P.2d 963 (Ct. App., 1993). In its concern for potential future misconduct by SPU, the IPUC ignores the 20+ year history of SPU which contains no evidence to indicate that SPU will treat its customers improperly. SPU's own history is evidence that SPU is operating in a manner satisfactory to its customers.

6. RULE 323.01(a)

In the event the IPUC still claims jurisdiction over SPU, it is requested that after compliance with the Request for a Regulatory Takings Analysis, the IPUC enter a final order with regards to jurisdiction under Rule 323.01(a), allowing SPU to file a Petition for Reconsideration under Rule 331 and then appeal this matter to the Idaho Supreme Court under Rule 341. Given the dispute between the IPUC and SPU regarding the applicability and relevancy of Idaho Supreme Court decisions and statutory interpretation, and the potential constitutional violations if *Stoehr* is not applied, it is essential that this matter is addressed by the Idaho Supreme Court prior to the IPUC exercising jurisdiction over SPU. SPU will not consent to such jurisdiction

by filing a Certificate of Convenience and Necessity. Should the IPUC refuse to issue a final order regarding jurisdiction under Rule 323, SPU will pursue a Writ of Prohibition and/or Mandate under Idaho Code Section 7-401, et. seq.

7. PETITION FOR STAY

Respondent further petitions for a stay of Order No. 35645, pursuant to IPUC Rule 324, and requests a stay of the Order to the extent it orders SPU to file an Application for a "CPCN" within thirty (30) days of the date of the Order. Because Respondent's Petition for Review addresses the IPUC's jurisdiction over SPU and the authority of IPUC to require such Application, such determinations must be decided before SPU is required to incur the costs and attorney fees required to prepare and file an Application for a CPCN.

CONCLUSION

The IPUC lacks jurisdiction over SPU because SPU does not qualify as a corporation under Idaho Code Section 61-104 or a water corporation under Idaho Code Section 61-125.

The IPUC improperly presumes facts in favor of jurisdiction, in direct violation of Idaho Supreme Court holdings. The Supreme Court requires an affirmative showing of statutory compliance in order for the IPUC to exercise jurisdiction. Order No. 35645 is based upon a negative showing of statutory compliance: "the Commission **cannot find** that the Company is a mutual nonprofit,

cooperative corporation, nor a public utility organized and operated for service at cost at this time..." See Order No. 35645, p. 9-10 (bold emphasis added). In order to exercise jurisdiction, IPUC must affirmatively (not presumptively or negatively) find that SPU is not organized and operated for service at cost.

IPUC further violates Supreme Court authority by overturning holdings without authorization. Absent an unequivocal dedication to the public, individuals and entities providing water for compensation are not deemed public utilities. IPUC has not provided any evidence that such unequivocal dedication has occurred or that *Stoehr* and other related cases have been overturned by the Idaho Supreme Court. Absent the *Stoehr* limitations on IPUC jurisdiction, Idaho Code Section 61-125 violates constitutional due process rights of water suppliers and requires a regulatory takings analysis to be completed before any further action is taken.

IPUC's demand for SPU to apply for regulation by submitting an application for a "CPCN" is also not justified under Idaho Code. SPU is neither building nor expanding a system requiring an application for a Certificate of Convenience and Necessity.

Based upon the foregoing it is requested that the IPUC recognize that it lacks jurisdiction over SPU and dismiss the Complaint filed by Donald Sorrells with prejudice to end this proceeding.

DATED this 17th day of January, 2023.

/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 17th day of January, 2023:

Document Served:

PETITION FOR REVIEW OF
INTERLOCUTORY ORDER AND PETITION
FOR STAY

Persons Served:

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