

RECEIVED

2020 OCT 19 PM 1:26

IDAHO PUBLIC
UTILITIES COMMISSION

Preston N. Carter (ISB No. 8462)
Charlie S. Baser (ISB No. 10884)
Givens Pursley LLP
601 W. Bannock St.
Boise, ID 83702
Telephone: (208) 388-1200
Facsimile: (208) 388-1300
prestoncarter@givenspursley.com
charliebaser@givenspursley.com

Attorneys for Falls Water Co., Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE
APPLICATION OF FALLS WATER
CO., INC. FOR APPROVAL OF
ACQUISITION OF THE ASSETS OF
MORNING VIEW WATER COMPANY

Case No. FLS-W-20-04

FALLS WATER CO., INC.'S REPLY
COMMENTS

Falls Water Co., Inc. ("Falls Water" or "Company") submits the following Reply Comments in response to Comments filed by the Idaho Public Utilities Commission Staff ("Staff").

Falls Water appreciates Commission Staff's diligence in reviewing the Application and the materials submitted in response to data requests, and in conducting the telephonic public hearings. In particular, Falls Water appreciates Staff's recognition that Morning View Water is a distressed small water utility, and that the proposed ratemaking treatment—treating prudently incurred investments as 100% equity until Morning View reaches a more reasonable capital structure, such as 50% debt and 50% equity treatment—is a reasonable method of making the acquisition economical.

In short, Falls Water agrees with, and intends to abide by, the recommendations provided by Staff in its comments.

DATED: October 19, 2020.

GIVENS PURSLEY LLP

A handwritten signature in blue ink, appearing to read "P. N. Carter", is written above a horizontal line.

Preston N. Carter

Charlie S. Baser

Givens Pursley LLP

Attorneys for Falls Water Co., Inc.

CERTIFICATE OF SERVICE

I certify that on October 19, 2020, a true and correct copy of the foregoing was served upon all parties of record in this proceeding via electronic mail as indicated below:

Commission Staff

Jan Noriyuki, Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg. 8, Ste. 201-A
Boise, ID 83714
jan.noriyuki@puc.idaho.gov

Electronic Mail

Matt Hunter
Deputy Attorney General
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg. 8, Ste. 201-A
Boise, ID 83714
Matt.Hunter@puc.idaho.gov

Electronic Mail



Preston N. Carter