Preston N. Carter (ISB No. 8462) Givens Pursley LLP 601 W. Bannock St. Boise, ID 83702 Telephone: (208) 388-1200 Facsimile: (208) 388-1300 prestoncarter@givenspursley.com 15712874_1.docx [13988-8] RECEIVED 2021 JUN 17 PM 2:45 IDAHO PUBLIC UTILITIES COMMISSION

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 THREE CAPITAL PROJECTS: 1) CREATION OF A NEW WATER SOURCE, 2) CONSTRUCTION OF A STORAGE TANK, AND 3) CONSTRUCTION OF A WELLHOUSE

Case No. FLS-W-21-01

UPDATE TO APPLICATION OF FALLS WATER CO., INC. FOR APPROVAL OF THREE CAPITAL PROJECTS: 1) CREATION OF A NEW WATER SOURCE, 2) CONSTRUCTION OF A STORAGE TANK, AND 3) CONSTRUCTION OF A WELLHOUSE

Falls Water Co., Inc. ("Falls Water" or "Company") submits this update to its

Application, filed on May 7, 2021.

Paragraph 17 of the Application provides,

Falls Water began work on constructing this new well, based on the Capital Facilities Plan, the timing of the construction season, and the identified needs of the system, but <u>has paused further work</u> while this Application is pending.

(emphasis added).

This spring has been unusually dry and warm, and many parts of the State are

experiencing drought conditions. In response to these conditions, Falls Water's customers have

used significantly more water than in recent years—nearly 10 million gallons more than were

used at this point last year. This increased usage, along with recent pressure fluctuations caused

by the lack of source redundancy, has increased the urgency of completing Well #11.

Falls Water is sensitive to concerns about completing a project while an Application that encompasses that project is pending. However, Falls Water's primary duty is to to provide adequate water service to its customers. In light of the circumstances, Falls Water has determined that the most prudent course is to continue construction of Well #11 while the Application is pending, and is investigating possible ways to accelerate the project to have the well in service as soon as possible. Falls Water will keep Commission Staff updated on the progress of well construction.

Please note that this Update to Application revises and updates paragraph 17 of the Application.

DATED: June 17, 2021.

GIVENS PURSLEY LLP

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Preston N. Carter Givens Pursley LLP Attorneys for Falls Water Co., Inc.

UPDATE TO APPLICATION FOR APPROVAL OF THREE CAPITAL PROJECTS - 2

CERTIFICATE OF SERVICE

I certify that on June 17, 2021, 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

Electronic Mail

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

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