

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](mailto:prestoncarter@givenspursley.com)  
Falls Water Company's Reply Comments, 8-18-2021.docx [13988-8]

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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**

FALLS WATER COMPANY'S REPLY  
COMMENTS

Falls Water Co., Inc. ("Falls Water" or "Company") files the following reply comments in response to the Comments filed by the Idaho Public Utilities Commission Staff ("Staff") on August 8, 2021.

Falls Water appreciates Staff's diligence in reviewing the Application and the materials submitted in response to data requests. Falls Water agrees with Staff's comments and recommendations.

Staff correctly notes that a security issuance request to issue debt has not been filed with the Commission. Staff Comments at 8. The Company would like to clarify that the capital projects will be financed with an intercompany cash transfusion that will not require the issuance of new debt. Falls Water recognizes that the Commission must approve issuance of debt as set forth in Idaho Code §§ 61-901 *et seq.*, and will seek approval before any such debt is issued.

DATED: August 18, 2021.

GIVENS PURSLEY LLP



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Preston N. Carter

Givens Pursley LLP

*Attorneys for Falls Water Co., Inc.*

## CERTIFICATE OF SERVICE

I certify that on August 18, 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**

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**

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

**Electronic Mail**



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Preston N. Carter