

RILEY NEWTON
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
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IDAHO PUBLIC
UTILITIES COMMISSION

Street Address for Express Mail:
11331 W CHINDEN BLVD, BLDG 8, SUITE 201-A
BOISE, ID 83714

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF PICABO LIVESTOCK)
COMPANY'S APPLICATION TO AMEND) **CASE NO. PIC-W-22-01**
ITS CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY NO. 220)
AND RELATED TARIFFS) **COMMENTS OF THE**
) **COMMISSION STAFF**
)

STAFF OF the Idaho Public Utilities Commission, by and through its Attorney of record, Riley Newton, Deputy Attorney General, submits the following comments.

BACKGROUND

On April 19, 2022, Picabo Livestock Company, Inc. (“Company”) notified the Commission that it had formed a new entity—Picabo Water System—with a separate set of books, and a new Employer Identification Number, to provide water service under Certificate of Public Convenience and Necessity (“CPCN”) No. 220.¹ The Company requested Commission authorization to amend CPCN No. 220 and related tariffs to reflect the name change. The Company proposed an April 30, 2021, effective date.

¹ Certificate of Convenience and Necessity No. 220 was granted to Picabo Livestock Company, Inc. in 1955 to supply water to the residents of the unincorporated town or community of Picabo, Idaho.

The Company is a Commission-regulated water corporation serving 35 residential customers and four commercial customers in and around the city of Picabo in Blaine County, Idaho.

The Company represented that the change to its name will have no impact on customers, who will continue to receive water service under the same rates, terms, and conditions as are currently in effect. The Company represented that it will make corresponding changes to bills, reports, and other documents to reflect the name change.

STAFF REVIEW

Staff reviewed the Company's Application and other necessary documents to confirm that the requested name change will not harm customers. Staff confirmed that the submitted tariffs reflecting the name change have the same rates, terms, and conditions as the tariffs currently on file with the Commission. Staff reviewed the Secretary of State website and noted² the name "Picabo Water System LLC," was adopted on December 15, 2021. Staff recommends the Company use the name "Picabo Water System LLC" in the amended CPCN No. 220 and tariffs.

In the Company's last general rate case,³ Staff recommended the Company remove the accounting function of the water system from the Parent Company's financial system and create a stand-alone entity to improve the accuracy of the water system reports and records.⁴ Since then, the Company has taken the necessary steps to create a stand-alone entity. Staff worked with the Company to update the tariffs with the correct name, which are included as Attachment A. To ensure consistency with other legal entities, Staff reviewed documents from the Internal Revenue Service and the Idaho Secretary of State, which confirm the use of the full company name, Picabo Water System LLC. *See* Attachment B. Staff recommends the Commission authorize the Company's name change to Picabo Water System LLC and adopt the new tariffs included as Attachment A.

As of May 25, 2022, there have been no public comments submitted.

² See website sosbiz.idaho.gov, which Staff used to validate name change with Idaho Secretary of State's Office.

³ *In the Matter of Picabo Livestock Company's Application for Authority to Increase its Rates and Charges for Water Service in the State of Idaho*, Case No. PIC-W-21-01(Nov. 30, 2021).

⁴ *See Id.*, Staff Comments at 7.

STAFF RECOMMENDATION

Staff recommends approval of the Company’s request to amend CPCN No. 220 changing the name of the water system to Picabo Water System LLC. Additionally, Staff recommends the Commission approve the tariffs included in Attachment A.

Respectfully submitted this 25th day of May 2022.



Riley Newton
Deputy Attorney General

Technical Staff: Travis Culbertson
Jolene Bossard
Joseph Terry

i:umisc/comments/picw22.1rntncjtjbksk comments

**SCHEDULE NO. 1
RECURRING CHARGES**

APPLICABLE:

To all customers for domestic and other uses.

FLAT RATE SERVICE FOR ALL ACCOUNTS:

RESIDENTIAL RATES

Residential Winter – Effective October 1 through March 31
(Six Months)

Rate: \$35.25 per month

Residential Summer – Effective April 1 through September 30
(Six Months)

Rate: \$66.00 per month

NON-RESIDENTIAL RATES

Commercial – (Twelve Months)

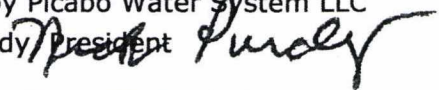
Rate: \$59.00 per month

Outlet - May 1 through September 30 (Five Months)

Rate: \$59.50 per month

Issued April 30, 2022
Effective April 30, 2022
Order No. 35213

Issued by Picabo Water System LLC
Nick Purdy, President



**SCHEDULE NO. 2
NON-RECURRING CHARGES**

APPLICABLE

To all customers for domestic and other uses.

RECONNECT FEES:

Charge is applicable to all customers where water has been physically turned off for non-payment of a delinquent bill.

Rate: \$20.00 Each Occurrence

SPECIAL PROVISIONS:

Service charge will apply for customer requested shut-off and/or turn-on.

Rate: \$15.00 Each Occurrence

LATE PAYMENT FEES:

Accounts not paid in full by the 30th are considered past due and subject to a service charge

Rate: 1.0% per month of unpaid balance

HOOK-UP FEE:

One-time hookup fee will be charged for hookup of new customers.

Rate: \$500.00



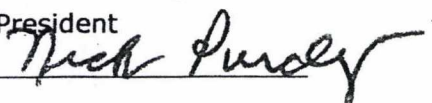
GENERAL RULES & REGULATIONS FOR SMALL WATER UTILITIES

1. GENERAL

- 1.1 The Customer, in receiving water service, and the Company, in providing water service, shall both agree to abide by these rules and regulations.
- 1.2 In the event that there is a conflict between these rules and regulations and the Utility Customer Relations Rules (UCRR) and the Utility Customer Information Rules (UCIR), the Rules and Regulations of the Idaho Public Utilities Commission (Commission) shall take precedence unless an exception has been granted.
- 1.3 All recurring and non-recurring charges shall be approved in advance by the Commission.

2. DEFINITIONS

- 2.1 Applicant - a potential customer (person, business or government agency) applying for service to the Company and subject to the Commission's rules and regulations.
- 2.2 Billing Period - the period of time between bills from the Company for normal services rendered.
- 2.3 Commission - Idaho Public Utilities Commission.
- 2.4 Commodity Charge - a recurring charge based only on the quantity of water used.
- 2.5 Company - the water company.
- 2.6 Connection or Hook-Up Fee - a non-recurring charge paid by a Customer requesting service for partial or full recovery of the Company's cost of providing a new service connection.
- 2.7 Contribution in Aid of Construction - a non-recurring charge paid by a Customer or developer to help defray the cost of system expansion.



Picabo Water System LLC
Sheet 4 Revision 3
Replaces All Previous Sheets

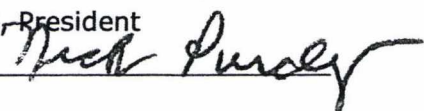
- 2.8 Customer - a person, business or government agency responsible for paying bills and complying with the rules and regulations of the company.
- 2.9 Customer Charge - a recurring fixed charge to recover a portion of the cost of meter reading and billing.
- 2.10 Fixed or Flat Rate - a recurring charge of a fixed amount, usually in an unmetered system.
- 2.11 Franchise Tax - the tax imposed on a Company by a governmental entity for the privilege of doing business within its boundaries.
- 2.12 Late Payment Charge - the non-recurring charge levied against any delinquent balance.
- 2.13 Minimum Charge - the minimum recurring charge for a billing period that may or may not include a specified quantity of water.
- 2.14 Non-recurring Charges - the charges that are not assessed each billing period.
- 2.15 Premises - the Customer's property including out buildings which are normally located on one lot or parcel of ground.
- 2.16 Rate Schedule - the schedules of all recurring and non-recurring charges of the Company.
- 2.17 Reconnection Charge - the charge paid by a Customer to the Company to restore service after disconnection.
- 2.18 Recurring Charges - the charges that are assessed each billing period.
- 2.19 Tariff - the rate schedules and the rules and regulations which govern the Company's service.
- 2.20 Utility Customer Relations Rules (UCRR) - Customer Relations Rules for Gas, Electric, and Water Public Utilities Regulated by the Idaho Public Utilities Commission (The Utility Customer Relations Rules) - IDAPA 31.21.01.000 et seq.

3. SERVICE FOR NEW CUSTOMERS

- 3.1 The Company shall furnish service to applicants within its certificated service area in accordance with rates and the rules and regulations approved by the Commission.

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Nick Purdy, President



Picabo Water System LLC
Sheet 5 Revision 3
Replaces All Previous Sheets

- 3.2 Applicants for water service may be required to sign a standard form of service application.
- 3.3 The Company shall not be obligated to provide service at a service location until any required deposit has been received by the Company in accordance with the UCRR.
- 3.4 Special contracts may be required where large investments in special facilities are necessary to provide the requested service. The Company may require contribution toward such investment and establish such minimum charges as are deemed necessary. All such contracts shall be subject to the approval of the Commission.
- 3.5 The Company reserves the right to place limitations on the amount and character of water service it will supply and to refuse service if, in its opinion:
 - a. the Company is required to refuse or limit service by regulatory authorities having jurisdiction over the Company;
 - b. the requested service installation is of larger size than is necessary to properly serve the premises;
 - c. the permanency of the building, structure, or institution requesting to be served is such that the Company's investment in such service is jeopardized;
 - d. the depth of the applicant's service line is less than the minimum depth required for frost protection;
 - e. the applicants' proposed service, main or other appurtenance does not conform to good engineering design or meet the standard specifications of the Company; or
 - f. if the applicant refuses to agree to abide by the rules and regulations of the Company.

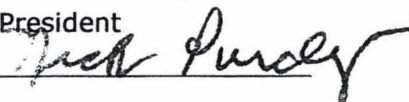
If the Company denies service to an applicant for any reason, it shall immediately provide the applicant with a written explanation of its decision in accordance with the UCRR.

4. DEPOSITS

- 4.1 Rules and Regulations regarding deposits can be found in the UCRR.

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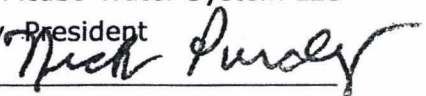
Attachment A
Case No. PIC-W-22-01
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5. RATES

- 5.1 Rates charged for water service and supply shall be those published in the Company's tariff and approved by the Commission.

6. BILLING AND PAYMENT

- 6.1 All Customers shall be billed on a regular basis as identified on the applicable rate schedule.
- 6.2 If the system is metered, the Company shall try to read the meters prior to each billing unless specified differently on the applicable rate schedule. If the Company's meter reader is unable to gain access to the premises to read the meter, or in the event the meter fails to register, the Company will estimate the Customer's water consumption for the current billing period based on known consumption for a prior similar period or average of several periods. Subsequent readings will automatically adjust for differences between estimated and actual. Bills based on estimated consumption shall be clearly marked as "estimated".
- 6.3 All bills shall clearly indicate the balance due, and may be due and payable no less than 15 days after the date rendered. All bills not paid by due date may be considered delinquent and service may be disconnected subject to the provisions of the UCRR.
- 6.4 A Late Payment Charge may be levied against any delinquent account. All payments received by the next billing date shall be applied to the Customer's account prior to calculating the Late Payment Charge.
- 6.5 The minimum bill or customer charge shall apply when service is provided for less than one month.
- 6.6 Owners of premises with one or more condominiums, buildings, stores, apartments or any other divisions of like or similar character, all of which are served from one (1) service connection are responsible for the entire water charges. If the owner desires to cease being responsible for water bills for such places and desires that the occupant of each division will be responsible for her or her respective bill, such transfer of responsibility will not be accepted or recognized by the Company until the plumbing arrangements of the building or premises are so changed by the owner or his or her agent as to permit the Company, to its

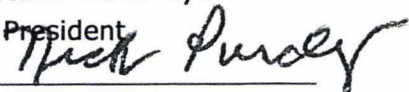


satisfaction, to serve each division or occupant separately from the other occupants in the same building.

- 6.7 Accounts shall be continued and water bills rendered regularly until the Company has been duly notified to discontinue service.

7. METERING (If Applicable)

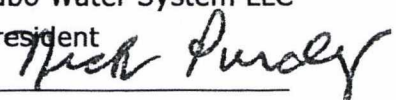
- 7.1 Meters will be installed by the Company near the Customer's property line or at any other reasonable location on the Customer's premises that is mutually agreed upon.
- 7.2 The Company's representative shall be given access to the Customer's premises at all reasonable hours for the purpose of obtaining meter readings. In the event of recurring inaccessibility the Company may, at its option and after notifying the customer, relocate its metering equipment at the Customer's expense.
- 7.3 The Company shall be responsible for the maintenance of its metering equipment. Meters are considered to be sufficiently accurate if tests indicate that meter accuracy is within ± 2 percent. When for any reason a meter fails to register within these limits of accuracy, the Customer's use of water shall be estimated on the basis of available data and charges shall be adjusted accordingly. Corrected bills shall then be sent out to the customer and additional payment or refund arrangements shall be made in accordance with the UCRR.
- 7.4 The Company reserves the right to test and/or replace any meter. Upon deposit of a "Meter Testing Fee" by a Customer, the Company will test the Customer's meter. If the test indicates that the meter over-registers by more than 2 percent, it shall be replaced with an accurate meter at no cost to the Customer and the "Meter Testing Fee" shall be refunded and water bills shall be adjusted in accordance with the UCRR. Meter Testing Fees shall require prior approval by the Commission.
- 7.5 At the Company's discretion, un-metered Customers may be converted to metered service if such transition occurs in a planned, systematic manner without unreasonable discriminations and if the Company has an approved metered rate.



- 7.6 The Company will have the right to set meters or other devices without notice to the Customer for the detection and prevention of fraud.
- 7.7 In any building where the meter is to be installed in the basement, the incoming water pipe must enter the basement at least sixteen (16) inches from the riser in order that a meter can be set in a horizontal position in the basement. All pipes to the different parts of the building or grounds must lead from the riser at least one (1) foot above the elbow.

8. CUSTOMER PLUMBING AND APPLIANCES

- 8.1 All plumbing, piping, fixtures and appliances on the Customer's side of the service connection will be installed and maintained under the responsibility and at the expense of the Customer or owner of the premises.
- 8.2 The plumbing, piping, fixtures and appliances shall be maintained in conformity with all municipal, state and federal requirements. The nature and condition of this plumbing, piping and equipment will be such as not to endanger life or property, interfere with service to other Customers or permit those with metered services to divert system water without meter registration.
- 8.3 A stop-and-waste valve will be installed on the Customer's plumbing in a place always accessible and so located as to permit shutting off the water for the entire premises with the least possible delay.
- 8.4 All persons having boilers, water tanks or other equipment supplied by direct pressure from the Company's mains should install a pressure relief valve, or other device to serve the same purpose, so as to prevent excess pressure from forcing hot water and/or steam back into the water meter and mains of the Company. All damage to the Company's property resulting from the failure to properly equip plumbing with a relief valve will be billed to the Customer.
- 8.5 The Company is not obligated to perform any service whatever in locating leaks or other trouble with the customer's piping.
- 8.6 When the premises served by the Company are also served in any manner from another water supply of any kind, an approved backflow prevention device shall be installed at the service

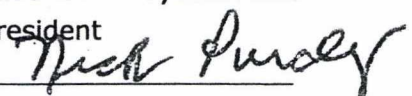


connection. Water service for either stand-by or other purposes will not be furnished until piping and connections are inspected and approved by a representative of the Company.

- 8.7 Property owners will not be allowed to connect the water service of different properties together.
- 8.8 All of the Customer's service pipes and fixtures must be kept in repair and protected from freezing at his or her expense. When there are leaking or defective pipes or fixtures, the water may be turned off at the option of the Company until the proper repairs are made.

9. INSTALLATION OF SERVICE CONNECTIONS

- 9.1 The service connection is the property of the Company and as such, the Company is responsible for its installation and maintenance. It consists of piping, curbstop and valve or meter box and a meter, if the system is metered. The service connection transmits water from the Company's water main to a valve or meter box generally located near the Customer's property line. All piping, valves or appliances beyond this point shall be the property and responsibility of the Customer.
- 9.2 The Company reserves the right to designate the size and location of the service line, curbstop, meter (if applicable) and meter or valve box and the amount of space which must be left unobstructed for the installation and future maintenance and operation thereof.
- 9.3 Where a service connection is desired for premises on which there is no permanent structure, the Company will install a service connection to said premises only upon payment by the applicant of the estimated cost of said service connection. If within a period of five (5) years from the installation of said service connection a permanent structure is erected on the premises, the Company will refund, with interest, the difference between any approved new Customer charges in effect at the time of connection, and the applicant's advance.
- 9.4 The extra costs of any out-of-the-ordinary circumstances requiring additional equipment or special construction techniques involved in the installation of a service connection will be agreed to in advance by the Customer and the Company.

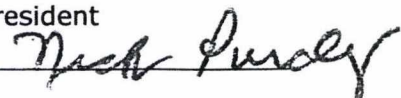


10. REPLACEMENT OR ENLARGEMENT OF SERVICE CONNECTION

- 10.1 Unless otherwise provided herein, the Company shall replace or enlarge service connections at its own expense as follows:
- a. whenever it is necessary to change the location of any service connection due to relocation or abandonment of the Company's mains; and,
 - b. for commercial or industrial services where the type or volume of use has changed and the enlargement will result in sufficient increase in annual revenue to justify the enlargement.
- 10.2 The relocation, enlargement or reduction of service connections for the convenience of the Customer will be at the expense of the Customer. Prior to such relocation, enlargement or reduction, the Customer will deposit the estimated cost thereof with the Company. Within fifteen (15) days, a refund will be made to the Customer in the amount by which the estimated cost exceeds the actual cost. The amount by which the actual cost exceeds the estimated cost will be due and payable within fifteen (15) days after billing for such deficiency.
- 10.3 Enlargement of any service connection will be made only after such time as the Customer's plumbing inside his or her premises have been enlarged sufficiently to accommodate the additional capacity.

11. DISCONNECTION AND RECONNECTION OF SERVICE

- 11.1 When a Customer desires to discontinue service he shall give notice to the Company at least two (2) days in advance and be responsible for all water consumed for the two (2) days after the date of such notice.
- 11.2 The Company shall discontinue a Customer's service on an involuntary basis only in accordance with UCRR.
- 11.3 When it becomes necessary for the Company to involuntarily discontinue water service to a Customer, service shall be reconnected only after all bills for service then due have been paid or satisfactory payment arrangements have been made.
- 11.4 A reconnection fee may be charged each time a Customer is disconnected, either voluntarily or involuntarily, and reconnected at



the same premises. The reconnection fee will be paid before service is restored. Reconnection fees shall not be charged for any situation or circumstance in which the Customer's water supply is disconnected by the Company for its convenience.

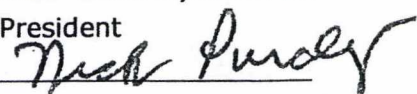
- 11.5 The Company reserves the right at any time, upon notice, to shut off the water for maintenance or expansion and, in emergencies, may do so without notice. The Company shall at all times use reasonable diligence and care to prevent interruption of said water service.
- 11.6 Except in the case of an emergency, no one, except an authorized Company representative, shall turn on or turn off the water on the Company's side of the service connection.

12. EXTENSION OF WATER MAINS

- 12.1 The extension of system water mains for the purpose of providing new service shall be handled in accordance with the "Uniform Main Extension Rules for Small Water Companies" which is attached to these Rules and Regulations as an Appendix.

13. MISCELLANEOUS

- 13.1 No customer shall permit any person from another premises to take water from his or her water service or tap for more than (1) week without the written permission and consent of the Company.
- 13.2 No person acting either on his or her own behalf or an agent of any person, firm, corporation or municipality not authorized by the Company shall take any water from any fire hydrant on the Company's system except in the case of an emergency.
- 13.3 No person shall place upon or about any hydrant, gate, box, meter, meter box or other property of the Company any building material or other substance so as to prevent free access at all times to the same.
- 13.4 Service will be maintained to domestic Customers on a preferential basis. Delivery of water under all schedules may be restricted, interrupted or curtailed at the discretion of the Company in case of shortage or threatened shortage of water.



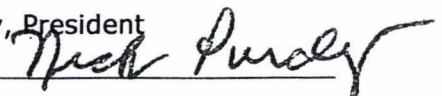
Picabo Water System LLC
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Replaces All Previous Sheets

- 13.5 No rate contract or application is assignable from one user to another, except upon agreement of all parties concerned.
- 13.6 The Company representative shall be given access to the premises of the Customer at all reasonable hours for obtaining meter readings, for turning on or shutting off the flow of water, for inspecting, removing, repairing or protecting from abuse or fraud any of the property of the Company installed on the premises. Access shall be granted at all times for emergency purposes.
- 13.7 No one shall tamper or interfere with the Company's equipment or property, nor shall repairs, connections or replacements be made without the Company authorization.
- 13.8 Whenever an applicant desires service of a character for which there is no available service classification, a contract may be executed in lieu of a tariff. Any such contract shall be subject to the approval of the Idaho Public Utilities Commission.
- 13.9 Copies of the Company's rates and summary of rules and regulations shall be available at the Company's office and provided to customers upon commencement of service, and annually thereafter in accordance with the UCRR and the UCIR.

14. Special Provisions or Amendments

Issued April 30, 2022
Effective April 30, 2022
Order No. 35213

Issued by Picabo Water System LLC
Nick Purdy, President



Date of this notice: 12-15-2021

Employer Identification Number:
87-3999387

Form: SS-4

Number of this notice: CP 575 G

PICABO WATER SYSTEM UC
PATRICK L PURDY SOLE MBR
PO BOX 688
PICABO, ID 83348

For assistance you may call us at:
1-800-829-4933

IF YOU WRITE, ATTACH THE
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN 87-3999387. This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear off stub and return it to us.

A limited liability company (LLC) may file Form 8832, *Entity Classification Election*, and elect to be classified as an association taxable as a corporation. If the LLC is eligible to be treated as a corporation that meets certain tests and it will be electing S corporation status, it must timely file Form 2553, *Election by a Small Business Corporation*. The LLC will be treated as a corporation as of the effective date of the S corporation election and does not need to file Form 8832.

To obtain tax forms and publications, including those referenced in this notice, visit our Web site at www.irs.gov. If you do not have access to the Internet, call 1-800-829-3676 (TTY/TDD 1-800-829-4059) or visit your local IRS office.

IMPORTANT REMINDERS:

- * Keep a copy of this notice in your permanent records. **This notice is issued only one time and the IRS will not be able to generate a duplicate copy for you.** You may give a copy of this document to anyone asking for proof of your EIN.
- * Use this EIN and your name exactly as they appear at the top of this notice on all your federal tax forms.
- * Refer to this EIN on your tax-related correspondence and documents.

If you have questions about your EIN, you can call us at the phone number or write to us at the address shown at the top of this notice. If you write, please tear off the stub at the bottom of this notice and send it along with your letter. If you do not need to write us, do not complete and return the stub.

Your name control associated with this EIN is PICA. You will need to provide this information, along with your EIN, if you file your returns electronically.

Thank you for your cooperation.



0004530995



STATE OF IDAHO
Office of the secretary of state, Lawrence Denney
CERTIFICATE OF ORGANIZATION LIMITED LIABILITY COMPANY

Idaho Secretary of State
PO Box 83720
Boise, ID 83720-0080
(208) 334-2301
Filing Fee: \$100.00

For Office Use Only

-FILED-

File #: 0004530995

Date Filed: 12/15/2021 10:36:30 AM

Certificate of Organization Limited Liability Company					
Select one: Standard, Expedited or Same Day Service (see descriptions below)	Expedited (+\$40; filing fee \$140)				
1. Limited Liability Company Name					
Type of Limited Liability Company	Limited Liability Company				
Entity name	Picabo Water System LLC				
2. The complete street address of the principal office is:					
Principal Office Address	NICHOLAS PURDY 213 RANCH RD PICABO, ID 83348				
3. The mailing address of the principal office is:					
Mailing Address	NICHOLAS PURDY PO BOX 688 PICABO, ID 83348-0688				
4. Registered Agent Name and Address					
Registered Agent	Registered Agent Patrick Purdy Physical Address: 213 RANCH RD PICABO, ID 83348 Mailing Address: PO BOX 688 PICABO, ID 83348-0688				
<input checked="" type="checkbox"/> I affirm that the registered agent appointed has consented to serve as registered agent for this entity.					
5. Governors					
<table border="1"> <thead> <tr> <th>Name</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>Picabo Livestock Company Inc.</td> <td>213 RANCH RD PICABO, ID 83348</td> </tr> </tbody> </table>		Name	Address	Picabo Livestock Company Inc.	213 RANCH RD PICABO, ID 83348
Name	Address				
Picabo Livestock Company Inc.	213 RANCH RD PICABO, ID 83348				
Signature of Organizer:					
<i>Patrick Purdy</i>	<u>12/15/2021</u>				
Sign Here	Date				

B0668-7844 12/15/2021 10:39 AM Received by ID Secretary of State Lawrence Denney

Attachment B
Case No. PIC-W-22-01
Staff Comments
12/15/2022 Page 2 of 2

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 25TH DAY OF MAY 2022, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. PIC-W-22-01, BY E-MAILING A COPY THEREOF TO THE FOLLOWING:

NICK PURDY
PRESIDENT
PICABO WATER SYSTEM
BOX 688
PICABO ID 83348
E-MAIL: nick@purdyent.com



SECRETARY

CERTIFICATE OF SERVICE