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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

|                             |   |                       |
|-----------------------------|---|-----------------------|
| IN THE MATTER OF CDS        | ) | Case No: SWS-W-24-01  |
| STONERIDGE UTILITIES, LLC'S | ) |                       |
| APPLICATION FOR AUTHORITY   | ) | INTERVENOR GARRISON'S |
| TO INCREASE ITS RATES AND   | ) | OPPOSITION TO         |
| CHARGES FOR WATER SERVICE   | ) | MODIFIED PROCEDURES   |
| IN THE STATE OF IDAHO       | ) |                       |
|                             | ) |                       |

Intervenor Garrison files this opposition to "Modified Procedures".

I  
BACKGROUND

On 28 May 2024, a NOTICE OF MODIFIED PROCEDURE was given to the parties. The notice was given pursuant to Rules of Procedure 201-204, IDAPA 31.01.01.201-.204.

Pursuant to Rule 203, Intervenor Garrison files this opposition (protest) to Modified Procedure. This opposition is timely, as it is filed within the time allowed by Rule 202.02.

INTERVENOR GARRISON'S OPPOSITION TO MODIFIED PROCEDURES

## II PROCEDURAL PREFERENCE

This is a General Water Rate Increase case. The IPUC “Case Processing Manual” states that General Rate Increase cases will “. . . generally follow the steps listed above in “Formal Technical Hearing” with additional substantive processing requirements.” A General Rate Increase case is not preferred to be handled under Modified Procedures.

The IPUC “Case Processing Manual” [at III., C (page 10)] explains:

“A technical hearing process differs from Modified Procedure in several ways.”

These “several ways” include:

- ☛ “. . . a prehearing scheduling conference is held and normally conducted by the assigned DAG (Rules 211-215);
- ☛ the parties typically engage in extensive discovery (Rules 221-29);
- ☛ a public workshop may be held (Rule 127) [and has been held];
- ☛ the parties present evidence in the form of pre-filed testimony and exhibits of witnesses (Rules 230-31, 266-67);
- ☛ a technical hearing is scheduled for the parties; and
- ☛ a formal public hearing located in the utility’s service area is held for

customers, public officials and other interested persons not related to the parties in the case (Rule 241.04.b).

### III Written Comments Alone Are Insufficient

Pursuant to Rule 203, Intervener Garrison specifically request a hearing.

Written comments alone are insufficient, because:

- (1) **SIZE OF PROPOSED INCREASE:** Applicant's proposed minimum monthly rate increase is 261% or 543%, depending on meter size. Applicant's proposed commodity (water) increase is a 300% increase (.79/1,000 Gallons to \$2.94/1,000 Gallons).
- (2) ***Size of Increase Demands thorough Evidentiary Review:*** The size of applicant's request alone demands a very thorough review of the evidence supporting and opposing applicant's proposed huge increase. Applicant's huge proposed increases is nothing less than "rate shock".
- (3) **AMOUNT OF DEBT:** The dept accumulated by Applicant is significant. For example, Stoneridge Utilities' 2022 Annual report (page 8) shows total debt (liabilities) of \$1,099,213. Total debt is more the 2 ½ times total assets (\$401,220, page 8). An Annual report for 2023 is yet to be filed by Stoneridge Utilities.

- (4) **GOLF COURSE:** The Applicant has removed the Golf Course (or at least most of the Golf Course) from Stoneridge Utilities customer base. Intervener estimates the removal of the Golf Course has resulted in a reduction in water volume to the Utility of 45%. Owner of the Golf Course is one and the same as the owner of Stoneridge Utilities. Owner has removed a primary user of the Utility, and wants the remaining users bare the increased burden.
- (5) **WELL:** Applicant has dug a new well on his golf course property. The expense of this well needs to be thoroughly examined. A review of whether the well should be a part of the water utility needs to be explored.
- (6) **CREDIBILITY:** Because of the above, actual testimony of the parites and witnesses needs to be taken. The credibility of Stoneridge Utilities' owner (Chan Karupiah) and its principal manager (Teresa Zamora) is an important criteria to be examined.

#### IV CONCLUSION

The Application presented by Stoneridge Utilities and the issues generated therefrom do not present a typical or routine general rate case. The Commission should not proceed with "Modified Procedure" and instead, proceed by way of a Formal Technical Hearing and Public Hearing.

DATED and Signed this 8<sup>th</sup> day of June, 2024.



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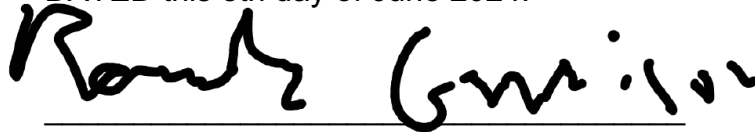
### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th day of June, 2024, I served a true and correct copy of the foregoing upon each party in this matter by delivering the same to each of the following individuals by the method indicated below, addressed as follows:

|   |  |
|---|--|
| Michael Duval<br>Deputy Attorney General<br>IDAHO PUBLIC UTILITIES COMMISSION<br>P.O. Box 83720<br>Boise, ID 83720-0074 | By e-mail <a href="mailto:michael.duval@puc.idaho.gov">michael.duval@puc.idaho.gov</a>   |
| CDS STONERIDGE UTILITIES, LLC<br>P.O. Box 298<br>Blanchard, ID 83804  | By e-mail <a href="mailto:chansan@comcast.net">chansan@comcast.net</a><br><a href="mailto:utilities@stoneridgeidaho.com">utilities@stoneridgeidaho.com</a> |

|   |   |
|---|---|
| <p>Norman M. Semanko, ISB #4761</p> <p>Patrick M. Ngalamulume, ISB #11200</p> <p>PARSONS BEHLE &amp; LATIMER</p> <p>800 W. Main Street, Suite 1300</p> <p>Boise, Idaho 83702</p>  | <p>By e-mail <a href="mailto:nsemanko@parsonsbehle.com">nsemanko@parsonsbehle.com</a></p> <p><a href="mailto:pngalamulume@parsonsbehle.com">pngalamulume@parsonsbehle.com</a></p> |
| <p>Rick Haruthunian</p> <p>CONDOMINIUM OWNERS ASSOC. INC:</p> <p>Ramsden, Marfice, Ealy &amp; De Smet, LLP</p> <p>(Exhibit Nos. 201-300) 700 Northwest Blvd.</p> <p>P.O. Box 1336</p> <p>Coeur d'Alene, ID 83816-1336</p> | <p>By e-mail: <a href="mailto:rharuthunian@rmedlaw.com">rharuthunian@rmedlaw.com</a></p>  |
|   |   |

DATED this 8th day of June 2024.



Randolph Lee Garrison