

**[garrison@rmgarrison.com](mailto:garrison@rmgarrison.com)**

**From:** garrison@rmgarrison.com  
**Sent:** Wednesday, June 12, 2024 8:47 AM  
**To:** 'Jeffrey Merkeley'; 'rharunthunian@medlaw.com'; 'pngalamuuume@parsonsbehle.com'; 'Chan'; 'Teresa Karupiah'; 'nsemanko@parsonsbehle.com'; 'Michael Duval'  
**Subject:** Supplemental Objections to Stoneridge Utilities PRR Responses

Jeff:

In addition to the objections below, please also not the following objections (the numbering below with the next number following the first objections):

(6) Stoneridge Utilities response must comply with Rule 228. Your response does not comply with Rule 228, because:

(a) There has been no agreement to use your "Google Documents" approach. Agreement is required by Rule 228.01.

(b) Answers must "must restate in full each question asked, then state in full the party's response to the question and the persons who will be able to answer questions about or sponsor the answer at hearing", as required by Rule 229.

(7) As stated in objection # 5, Rule 221.05 requires compliance with IRCP 34 (b)

(2). Subsection E (i) requires electronically stored information to be produced "as they are kept in the usual course of business".

(c) The responses have not been filed with the Commission. Filing with the Commission is required by Rule 228.02.

Randy Garrison

(541) 580-4446

[garrison@rmgarrison.com](mailto:garrison@rmgarrison.com)

**From:** garrison@rmgarrison.com <[garrison@rmgarrison.com](mailto:garrison@rmgarrison.com)>

**Sent:** Tuesday, June 11, 2024 9:09 PM

**To:** 'Jeffrey Merkeley' <[jeff@merkeley.com](mailto:jeff@merkeley.com)>; 'rharunthunian@medlaw.com' <[rharunthunian@medlaw.com](mailto:rharunthunian@medlaw.com)>; 'pngalamuuume@parsonsbehle.com' <[pngalamuuume@parsonsbehle.com](mailto:pngalamuuume@parsonsbehle.com)>; 'Chan' <[chansan@comcast.net](mailto:chansan@comcast.net)>; 'Teresa Karupiah' <[tkarupiah@gmail.com](mailto:tkarupiah@gmail.com)>; 'nsemanko@parsonsbehle.com' <[nsemanko@parsonsbehle.com](mailto:nsemanko@parsonsbehle.com)>; 'Michael Duval' <[michael.duval@puc.idaho.gov](mailto:michael.duval@puc.idaho.gov)>

**Subject:** Objection to Stoneridge Utilities PRR Responses

Jeff:

(1) I understand that the documents provided are not subject to the Non-Disclosure Agreement.

(2) All the responses given by you are dead ends, evasive or not responsive to my request for production of documents.

(3) Please respond by listing my request, immediately followed by your answer.











(4) Don't send us down Alice in Wonderland journey by clicking on files which are dead ends or have no context or meaning.

(5) Please comply with IRCP 34 (b) (2). Rule 221.05.

For Example:

When I tried to access the first item, "Known Changes", I received these responses:

Type ▾ People ▾ Modified ▾

Name	↑	Last mo...
	~\$Backup Power System.xlsx 	Feb 14, 20
	~\$Wireless meter changeout Cap Ex.xlsx 	Feb 14, 20
	2023 usage water.pdf 	Feb 6, 20
	Backup Power System.xlsx 	Feb 26, 20
	Wireless meter changeout Cap Ex.xlsx 	Feb 21, 20

Then:



Couldn't preview file  
You may be offline or with limited connectivity. Try d  
instead.



Download

Then:







Couldn't preview file  
You may be offline or with limited connectivity. Try d  
instead.










Download

The next item was: "2nd Production Request Submittal 4-24-24 IPUC"  
Which returned this:







Name	↑	Last mo... ▼
	PR2_Quest. 31 - Comp	5:55 PM
	PR2_Quest. 32 - Comp	5:55 PM
	PR2_Quest. 33 - Comp	5:55 PM
	PR2_Quest. 34 - Comp	5:55 PM
	PR2_Quest. 35 - Comp	5:55 PM
	PR2_Quest. 36 - Comp	Apr 24, 2024

Which returned this:

Name	↑	Last mo...
	Chan Review Files	5:55 PM
	~\$See Exhibit 8 General Rate Case 2_15_2... 	Apr 8, 202
	Silo #31 Title Page.docx 	Apr 23, 20
	XMonthly Revenue by Customer WITHOU... 	Apr 23, 20

Which returned this:

Name	↑	Last m
	Original file with names Monthly Revenue ... 	Jun 5, 2
	Original file with names Monthly Revenue ... 	Jun 5, 2

Which returned this:

# STONERIDGE UTILITIES, LLC Billing Register for 9/29/2023

(created 09/29/2023 by TERESA)

CustomerId	Water	Misc	Other	Previous	C
01-00030-00 BROWN, JOHN & DONNA	35.06	0.00	0.00	0.00	
					Wtr Use 14,000
01-00220-00 MACKLIN, MIKE & LIBBY	35.85	0.00	0.00	0.00	
					Wtr Use 15,000
01-00280-01 MOE, MARK & MARTHA	24.79	0.00	0.00	0.00	
					Wtr Use 1,000
01-00310-00 COOK, CHARLES & KATHLEEN	42.17	0.00	0.00	0.00	
					Wtr Use 23,000
01-01650-00 BECK, DELIA M.	36.64	0.00	0.00	0.00	
					Wtr Use 16,000
01-02350-00 GURLEY, SCOTT & BARBARA	30.32	0.00	0.00	35.85	
					Wtr Use 8,000
01-02880-00 MCKAMEY, JAMES B.	25.58	0.00	0.00	0.00	
					Wtr Use 2,000
01-03710-00 JMBCA	27.95	0.00	0.00	0.00	
					Wtr Use 5,000
01-03720-00 JMBCA	61.92	0.00	0.00	76.93	
					Wtr Use 48,000
01-04270-00 RAPALLI, CATHRYN & BOB	29.53	0.00	0.00	0.00	
					Wtr Use 7,000
01-04400-01 CAMPEA, BRANDON & ABBEY	29.53	0.00	0.00	0.00	
					Wtr Use 7,000
01-04520-00 COLES, MIKE & TERESA	44.54	0.00	0.00	0.00	
					Wtr Use 26,000
01-04790-00 WERCKLE, JOE & JANICE	27.10	0.00	0.00	0.00	
					Wtr Use 4,000



A note at the end of your e-mail states:



“PRR 1,2,3,5., along with the primary Excel Exhibit with the application and a couple of the individual excel files for known changes, volumes pumped and rate case cost amortization. We are copying both other Intervenors.”


This statement is without context, unintelligible and does not contain any documents which are referred to.

Randy Garrison  
(541) 580-4446  
[garrison@rmgarrison.com](mailto:garrison@rmgarrison.com)


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**From:** Jeffrey Merkeley <[jeff@merkeley.com](mailto:jeff@merkeley.com)>  
**Sent:** Tuesday, June 11, 2024 6:13 PM  
**To:** Randy Garrison <[garrison@rmgarrison.com](mailto:garrison@rmgarrison.com)>; [rharunthunian@medlaw.com](mailto:rharunthunian@medlaw.com); [pngalamuuume@parsonsbehle.com](mailto:pngalamuuume@parsonsbehle.com); Chan <[chansan@comcast.net](mailto:chansan@comcast.net)>; Teresa Karupiah <[tkarupiah@gmail.com](mailto:tkarupiah@gmail.com)>; [nsemanko@parsonsbehle.com](mailto:nsemanko@parsonsbehle.com)  
**Subject:** PRR Responses

Randy, we've been struggling getting these files to send. We sending them from a google drive link. if you are prompted to request access please reply and we will approve the access when we get the email request.

 Known Changes

 2nd Production Request Submittal 4-24-24 IPUC

 3rd Production Request Submittal 4-24-24

 First Prod. Request Final Submittal - 4-16-2024 Working File

PRR 1,2,3,5., along with the primary Excel Exhibit with the application and a couple of the individual excel files for known changes, volumes pumped and rate case cost amortization.

we are copying both other Intervenors.

Jeffrey Merkeley  
Technical Assistance Group  
208-920-0442  
[jeff@merkeley.com](mailto:jeff@merkeley.com)