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April 1, 2024

Monica Barrio Sanchez,  
Commission Secretary  
IDAHO PUBLIC UTILITIES COMMISSION  
11331 W. Chinden Boulevard,  
Building 8, Suite 201-A  
P. O. Box 83720  
Boise, Idaho 83720-0074

VIA EMAIL ONLY  
*monica.barriossanchez@puc.idaho.gov*

**Re: Response to Opposition to Legal Counsel for StoneRidge Property Owners Association**

Dear Commission Secretary:

I am writing in response to the recent request submitted by Chan Karupiah (“Mr. Karupiah”) on behalf of CDS StoneRidge Utilities, LLC (“StoneRidge Utilities”)<sup>1</sup> to deny my involvement in the General Rate Case SWS-W-24-01. I appreciate Stoneridge Utilities’ diligence in ensuring that all parties involved in this matter comply with ethical standards. I take my ethical obligations very seriously. As I determined prior to agreeing to represent StoneRidge Property Owners Association (“SPOA”) in this matter, there is no substantial relationship between the Rate Case and my previous legal representation of Mr. Karupiah and his interests, pursuant to the Idaho Rules of Professional Conduct (“IRPC”). Moreover, I have never represented StoneRidge Utilities.

IRPC Rule 1.9(a) provides the following regarding former clients:

(a) A lawyer who has formerly represented a client in a matter shall not thereafter represent another person in the same or a substantially related matter in which that person's interests are materially adverse to the interests of the former client unless the former client gives informed consent, confirmed in writing.

*Vega v. GEICO Choice Ins. Co.*, 645 F. Supp. 3d 987, 993 (D. Idaho 2022).

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<sup>1</sup> CDS StoneRidge Utilities is duly recognized as an Idaho limited liability company. IPUC Rules of Procedure 043(c) states “A municipal corporation; a state, federal, tribal, or local government agency; an unincorporated association; a non-profit organization, or other entity shall be represented by a licensed attorney.”

The nature of my previous representation of Mr. Karupiah and his interests is completely unrelated to the matter at hand. The legal services previously provided have no bearing on the General Rate Case. Conversely, my current representation of SPOA involves distinct and substantially unrelated matters from those that I previously handled for Mr. Kurupiah. There is no substantial relationship between the previous matter handled for Mr. Karupiah and the current matter being handled for SPOA. The legal issues, parties involved, and desired outcomes are disparate and independent of each other. Furthermore, these matters are not substantially related as they do not pertain to the same transaction or legal dispute.

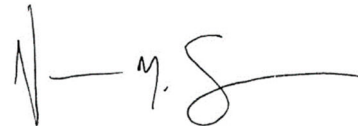
Therefore, the Idaho Rules of Professional Conduct do not prohibit my involvement in the current case. My representation of SPOA in the General Rate Case does not present a conflict of interest with my prior representation of Mr. Karupiah. In addition, as required by IRPC 1.9(c), I will not use information relating to my previous representation of Mr. Karupiah to his disadvantage, although I am free to use any generally known information under the rule.

Moreover, StoneRidge Utilities has not addressed the substantive issues beyond requesting the Commission deny my involvement in this case. For the Petition to Intervene, SPOA has met all of the necessary requirements to participate in General Rate Case SWS-W-24-01. Therefore, SPOA's request to intervene in General Rate Case SWS-W-24-01 should be granted.

I respectfully request that StoneRidge Utilities' request, as submitted by Mr. Karupiah, be denied. Should you require any further clarification regarding this matter, please do not hesitate to contact me.

Respectfully submitted,

PARSONS BEHLE & LATIMER

A handwritten signature in black ink, appearing to read "N.M. Semanko". The signature is written in a cursive style with a long horizontal stroke at the end.

Norman M. Semanko  
Attorney at Law

NMS:kea

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 1st day of April, 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 Deputy Attorney General IDAHO PUBLIC UTILITIES COMMISSION P.O. Box 83720 Boise, ID 83720-0074	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input checked="" type="checkbox"/> Email <a href="mailto:michael.duval@puc.idaho.gov">michael.duval@puc.idaho.gov</a>
CDS STONERIDGE UTILITIES, LLC P. O. Box 298 Blanchard, ID 83804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input checked="" type="checkbox"/> Email <a href="mailto:chansan@comcast.net">chansan@comcast.net</a> <a href="mailto:utilities@stoneridgeidaho.com">utilities@stoneridgeidaho.com</a>
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Randolph Lee Garrison 76 Bellflower Court Blanchard, Idaho 83804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input checked="" type="checkbox"/> Email <a href="mailto:garrison@rmgarrison.com">garrison@rmgarrison.com</a>



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