

Norman M. Semanko, ISB #4761  
Patrick M. Ngalamulume, ISB #11200  
PARSONS BEHLE & LATIMER  
800 W. Main Street, Suite 1300  
Boise, Idaho 83702  
Tel: (208) 562-4900  
Fax: (208) 562-4901  
Email: *nsemanko@parsonsbehle.com*  
*pngalamulume@parsonsbehle.com*

Attorneys for Stoneridge Property Owners Association

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF CDS STONERIDGE  
UTILITIES, LLC'S APPLICATION FOR  
AUTHORITY TO INCREASE ITS RATES  
AND CHARGES FOR WATER SERVICE  
IN THE STATE OF IDAHO

Case No.: SWS-W-24-01

STONERIDGE PROPERTY OWNERS  
ASSOCIATION'S PROTEST TO  
MODIFIED PROCEDURE

Stoneridge Property Owners Association ("SPOA"), by and through its counsel of record, Parsons Behle & Latimer, hereby submits this opposition pursuant to IDAPA Rule 203 to notice of modified procedure under Order No. 36192.

On May 28, 2024, the Idaho Public Utilities Commission ("Commission") issued a notice determining that this case would proceed under Modified Procedure pursuant to the Commission's Rules of Procedure 201-204, IDAPA 31. 01.01. 201-204. This decision was met with significant skepticism by SPOA, as it is deemed unfair to forgo a full hearing on an issue of this magnitude. Given the complexity and potential impact of the case, SPOA requests a full comprehensive technical hearing.

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## PROCEDURAL REQUEST

Under the Commission's Rules of Procedure, General Rate Cases are typically subject to the rules governing formal technical hearings. Such hearings are essential to ensure that all interested parties have the right to present their case and be heard before the Commission.

Pursuant to Rule 203, Intervenor SPOA requests a transition from modified procedure to a formal technical hearing based on the following points:

(1): **Representation by legal counsel:** The Applicant Stoneridge Utilities, LLC is duly recognized as an Idaho limited liability Company. According to the Commission's Rules of Procedure 043, such an entity must be represented by a licensed attorney in proceedings before the Commission. Currently, the Applicant has not engaged legal representation, a requirement that must be fulfilled for the legitimacy and integrity of this General Rate Case. This is further supported by the Idaho Rules of Professional Conduct.

(2): **Comment Period Ambiguity:** The notice specifies an August 7, 2024, deadline for comments but fails to clarify whether intervenors like SPOA are allowed to submit their comments within this timeframe. This lack of clarity undermines the participatory rights of intervenors and could lead to procedural confusion.

(3): **Need for Cross-Examination:** The Modified Procedures structure does not afford SPOA the essential right to a formal hearing where it can cross-examine the Applicant on the necessity and justification for the proposed rate increases. Furthermore, it restricts SPOA from questioning the Commission Staff on its findings and recommendations, which is vital for a transparent and thorough examination of the case.

(4): **Substantial Rate Increase:** The Application proposes an average rate increase of 261% affecting all customers uniformly. Such a drastic and broad increase demands a meticulous

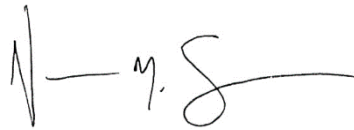
and detailed review of the evidence presented by the Applicant and the analysis undertaken by Commission Staff. A formal technical hearing is necessary to scrutinize this evidence and analysis adequately and ensure that any rate adjustments are justified and fair.

### **CONCLUSION**

Given these substantial concerns, intervenor SPOA respectfully urges the Commission to reconsider its decision to proceed under modified procedures. Instead, SPOA requests that the Commission conduct a formal technical hearing to ensure a comprehensive, transparent, and fair evaluation of the proposed rate increase.

DATED this 17<sup>th</sup> day of June, 2024.

PARSONS BEHLE & LATIMER

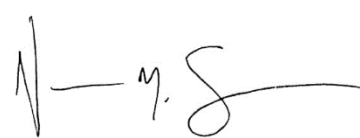
A handwritten signature in black ink, appearing to read 'N. M. S.', written over a horizontal line.

Norman M. Semanko  
Patrick M. Ngalamulume  
Attorneys for Stoneridge Property Owners  
Association

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 17<sup>th</sup> 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:

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|--|---|
| Michael Duval, Deputy Attorney General<br>IDAHO PUBLIC UTILITIES COMMISSION<br>472 W. Washington (83702)<br>P.O. Box 83720<br>Boise, ID 83720-0074   | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Facsimile<br><input type="checkbox"/> Hand Delivery<br><input type="checkbox"/> Overnight Delivery<br><input checked="" type="checkbox"/> Email <a href="mailto:michael.duval@puc.idaho.gov">michael.duval@puc.idaho.gov</a>   |
| Chan Karupiah<br>CDS STONERIDGE UTILITIES, LLC<br>P. O. Box 298<br>Blanchard, ID 83804   | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Facsimile<br><input type="checkbox"/> Hand Delivery<br><input type="checkbox"/> Overnight Delivery<br><input checked="" type="checkbox"/> Email <a href="mailto:chansan@comcast.net">chansan@comcast.net</a><br><a href="mailto:utilities@stoneridgeidaho.com">utilities@stoneridgeidaho.com</a> |
| Rick Haruthunian<br>RAMSDEN, MARFICE, EALY & DE SMET LLP<br>700 Northwest Boulevard<br>P. O. Box 1336<br>Coeur d'Alene, ID 83816-1336<br><i>Attorney for Stoneridge Recreational Club<br/>                 Condominium Owners Assoc., Inc.</i> | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Facsimile<br><input type="checkbox"/> Hand Delivery<br><input type="checkbox"/> Overnight Delivery<br><input checked="" type="checkbox"/> Email <a href="mailto:rharuthunian@rmedlaw.com">rharuthunian@rmedlaw.com</a>   |
| Randolph Lee Garrison<br>76 Bellflower Court<br>Blanchard, ID 83804  | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Facsimile<br><input type="checkbox"/> Hand Delivery<br><input type="checkbox"/> Overnight Delivery<br><input checked="" type="checkbox"/> Email <a href="mailto:garrison@rmgarrison.com">garrison@rmgarrison.com</a>   |

  
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 Norman M. Semanko