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*Attorneys for Stoneridge Recreational Club
Condominium Owners Association, Inc.*

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

**PETITIONER STONERIDGE
RECREATIONAL CLUB
CONDOMINIUM OWNERS
ASSOCIATION, INC.'S PETITION TO
INTERVENE**

COMES NOW Stoneridge Recreational Club Condominium Owners Association, Inc. ("Petitioner" or "SRCCOA"), by and through its counsel of record, Ramsden, Marfice, Ealy & De Smet, LLP, and respectfully submits its Petition to Intervene ("Petition") in the above-captioned case pursuant to Idaho Administrative Procedures Act ("IDAPA") 31.01.01 et seq. and the *Notice of Application; Notion of Intervention Deadline; Notice of Proposed Effective Date; Order No. 36116*, issued in this matter by the Idaho Public Utilities Commission ("Commission") on March 13, 2024 ("Order"), and hereby respectfully moves the Commission for an order granting the same thus recognizing Petitioner as a party and permitting it to participate in all aspects of this matter as such pursuant IDAPA 31.01.01 et seq. and all mandatory law.

Pursuant to Rule 71 of IDAPA 31.01.01 et seq., and as set forth more fully below, this Petition is wholly appropriate as Petitioner is a non-party with a direct and substantial interest in this proceeding (i.e., the above-captioned case).

Pursuant to Rule 72(a) of IDAPA 31.01.01 et seq., Petitioner's name and address is as follows: Stoneridge Recreational Club Condominium Owners Association, Inc., 150 Holiday Loop Blanchard, ID 83804. Pursuant to Rules 41, 43, and 72 of IDAPA 31.01.01 et seq., Petitioner is represented both generally and in this matter by undersigned legal counsel (who is an active member of the State Bar of Idaho), with the physical and electronic address for purposes of receipt of all official documents being as follows:

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Pursuant to Rule 72(b) of IDAPA 31.01.01 et seq., Petitioner is a domestic non-profit corporation formed on September 12, 1989, recognized and operating as such since under the laws of the State of Idaho. At all pertinent times, Petitioner (and derivatively, its members and its residential/commercial customers) is a customer of StoneRidge Utilities, LLC, dba StoneRidge Water Company ("Applicant") and thus would be subject to Applicant's proposed 261 percent rate increase as referenced in the *Notice of Application* served in this matter on March 13, 2024. *Notice of Application* at pp. 1-2 ("the Company proposes to increase rates for customers by an average of 261 percent—which represents an overall increase in revenue of \$555,190 to the Company. The increases would apply to residential

customers in Stoneridge and Happy Valley subdivisions, commercial customers at SR Resort/Timeshare and MCV & Golf Course, Irrigation, and Golf Course Irrigation customers.”); *see also Exs. D¹ & E²* to Application to the Idaho Public Utilities Commission for Changes to General Tariff Rates & Charges SWS-W-24-01 Applicant Information & List of Attachments (“Application”). The magnitude of Applicant’s proposed rate increase is shockingly exorbitant and entirely unjust and unreasonable (both generally and with respect to the materials supporting the Application) and shall constitute a critically significant hardship upon the Petitioner, its members, and its clientele if approved – who, of course, lack the recourse to seek such services at a more reasonable and viable expense elsewhere.

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UTILITIES COMMISSION

Pursuant to Rules 72(c) and 74 of IDAPA 31.01.01 et seq., Petitioner’s advocating of such direct and substantial interests as set forth above pertains to and speaks directly to the crux of the Application and shall not unduly broaden the issues thereof. Furthermore, the advocating of Petitioner’s interest, which cannot be adequately represented by anyone but Petitioner, will neither disrupt proceedings nor will it prejudice any of the parties.

Pursuant to Rules 72 and 161-165 of IDAPA 31.01.01 et seq., Petitioner respectfully reserves the right to petition for intervenor funding as permitted thereunder in the event this Petition is granted.

The *Notice of Intervention Deadline* served on March 13, 2024, sets forth an operative

¹ Therein denoting a 261% increase in revenue for “Commercial SR Resort/Timeshare.”

² Providing in part that: “In the application, CDS StoneRidge Utilities, LLC. is proposing 1) a revenue increase of approximately \$555,190 which represents an overall increase of 261 % to be applied to all classes of customers (Golf Irrigation Revenue is projected to decline to \$0). 2) A monthly user increase will be imposed on all current and future customers within the Service Territory. 3) A disconnect/reconnect fee increase will be imposed on all customers choosing to have their water shut off and turned "back on" later. 4) And Clarifications and changes to the General Rules and Regulations.”

deadline of April 3, 2024, for the filing of such motions to intervene.³ Pursuant to Rule 73 of IDAPA 31.01.01 et seq. and its deference to the deadlines set forth in the Commission notice and order, this Petition has accordingly been timely filed.

For the foregoing reasons, Petitioner respectfully requests that its petition be granted and that the Petitioner is accordingly permitted to intervene and to participate in all aspects of this matter as a party pursuant IDAPA 31.01.01 et seq. and all mandatory law.

DATED this 21st day of March, 2024.

RAMSDEN, MARFICE, EALY & DE SMET, LLP

By 

Rick Haruthunian, Of the Firm
*Attorneys for Stoneridge Recreational Club
Condominium Owners Association, Inc.*

³ The Notice of Intervention Deadline provides: “YOU ARE FURTHER NOTIFIED that persons desiring to intervene in this matter to obtain parties’ rights of participation must file a Petition to Intervene with the Commission pursuant to this Commission’s Rules of Procedure 72 and 73, IDAPA 31.01.01.072 and .073. Persons who wish to intervene as a party must file a Petition to Intervene no later than 21 days after the date of service of this Order. Persons desiring to present their views without parties’ rights of participation do not have to intervene and may present their comments without prior notification to the Commission or the parties.” *Id.* at p. 3.

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of March, 2024, I served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Michael Duval
Deputy Attorney General
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

US Mail
 Overnight Mail
 Hand Delivered
 Facsimile

RECEIVED
Friday, March 22, 2024 9:18:42 AM
IDAHO PUBLIC
UTILITIES COMMISSION

Email to:
Michael.dubal@puc.idaho.gov

CDS Stoneridge Utilities, LLC
P.O. Box 298
Blanchard, ID 83804

US Mail
 Overnight Mail
 Hand Delivered
 Facsimile

Email to: chansan@comcast.net;
utilities@stoneridgeidaho.com

/s/ Renee Schoonover
Renee Schoonover