

Title:

National Power Corporation vs. Felicisimo Tarcelo and Heirs of Comia Santos

Facts:

The case involves the National Power Corporation's (NPC) attempt to expropriate a portion of lands owned by Felicisimo Tarcelo and heirs of Comia Santos in Batangas City, Philippines, for its Ilijan Natural Gas Pipeline Project. The Regional Trial Court (RTC) of Batangas ordered the acquisition of portions totaling 1,595.91 square meters from the owners' lands, valued at P1,000.00 per square meter. NPC appealed the decision to the Court of Appeals, which modified the compensation rate to P797.50 per square meter. Upon the finality of this decision, an execution dispute arose when NPC was asked to compensate for the entire lands owned by Tarcelo and Santos heirs, not just the 1,595.91 square meter portion initially identified. NPC sought to quash this demand, arguing that compensation should only cover the explicitly affected areas. The RTC and CA, however, interpreted the decisions to imply compensation for the entirety of the owners' properties, leading to NPC's filing of a Petition for Review on Certiorari with the Supreme Court.

Issues:

1. Whether the Court of Appeals erred in affirming the trial court's orders that demanded NPC to compensate for the entire property of the respondents, not just the affected portions as stipulated in the trial court's decision.
2. Whether the Court of Appeals erred in upholding the trial court's decision to deny NPC's Motion for Reconsideration, disregarding the principle of liberality espoused in several Supreme Court decisions.

Court's Decision:

The Supreme Court granted the petition, ruling that execution must conform to the decision's dispositive part, which in this case, specifically ordered NPC to compensate for the acquired portions totaling 1,595.91 square meters at the rate determined by the Court of Appeals. The Supreme Court clarified that the NPC is responsible for just compensation only for this specified area, not the entirety of the lands owned by Tarcelo and the Santos heirs. The high court found both the trial and appellate courts' wider interpretation as diverging from the explicit decrees of the original and appellate decisions.

Doctrine:

The immutable principle reiterated in this case is that the execution of a judgment must strictly adhere to what is decreed in the dispositive portion of the decision. Any execution

beyond the scope of the judgment is deemed void for lack of basis and jurisdiction. Moreover, the doctrine of immutability of judgments was underscored, emphasizing that once a judgment becomes final and executory, it is beyond the power and jurisdiction of any court to alter or amend, except for clerical errors or nunc pro tunc entries which clarify but do not change the judgment's content and context.

Class Notes:

1. **Judgment Execution**: Must be in harmony with, and confined to, the scope of the dispositive part of the judgment.
2. **Immutability of Final Judgments**: No court can alter or amend a final and executory judgment. Any modifications that substantially affect the judgment are void for lack of jurisdiction.
3. **Doctrine of Execution Conformity**: The execution of a judgment cannot extend beyond what was ordained in the decision's dispositive section.

Historical Background:

This case reflects the conflict between the state's power of eminent domain for public utility projects and private landowners' property rights. It also demonstrates the procedural journey and legal challenges involved in executing court judgments, particularly in expropriation cases where the determination of just compensation is contested.