

**Title:** Metro Iloilo Water District vs. Hon. Court of Appeals, et al.

**Facts:**

1. **Parties Involved:**

- Petitioner: Metro Iloilo Water District (MIWD)
- Respondents: Hon. Court of Appeals, Hon. Severino C. Aguilar (Presiding Judge, Branch 35, RTC Iloilo), Emma Nava, Rufino Sitaca, Jr., Rexes Ursua, Carmen Pangantihon, Benito Go, Rebecca Berlin, Luis Carreon, Charles Kana-an, and Gerry Luzuriaga

2. **Background of Petitioner:**

- MIWD is a water district created under Presidential Decree No. 198 (P.D. 198), as amended.
- It holds Conditional Certificate of Conformance No. 71, issued by the Local Water Utilities Administration on January 12, 1979.
- MIWD's service areas include Iloilo City and surrounding municipalities.

3. **Petitions for Injunction:**

- Between April and May 1993, MIWD filed nine identical petitions for injunction, praying for preliminary injunctions and/or temporary restraining orders against the respondents for unauthorized water extraction.
- The petitions alleged violations of MIWD's rules set under Section 31(a) of P.D. 198, claiming respondents abstracted or withdrew groundwater without securing the necessary permits from the National Water Resources Council (NWRC).

4. **Respondents' Defense:**

- **Jurisdiction Argument:** Respondents uniformly argued the trial court lacked jurisdiction, asserting the NWRC held original and exclusive jurisdiction over such disputes based on Presidential Decree No. 1067 (Water Code of the Philippines).
- Individual Defenses: Respondents variedly denied the allegations, claimed ignorance of the permit requirement, disputed the applicability of petitioner's rules, or pointed out procedural errors like lack of publication of said rules.

5. **Trial Court's Dismissal:**

- The RTC dismissed the petitions on March 17, 1994, citing lack of jurisdiction, stating the matters fell within the purview of the NWRC.
- The RTC referenced the doctrine of "primary administrative jurisdiction" and noted MIWD's failure to exhaust administrative remedies.

6. **Procedural Posture:**

- MIWD's motion for reconsideration was denied on April 29, 1994.
- MIWD sought review of the dismissal order before the Supreme Court, which referred the matter to the Court of Appeals.
- The Court of Appeals affirmed the RTC's decision on June 19, 1995, and subsequently denied MIWD's motion for reconsideration on September 29, 1995.

7. **Supreme Court Petition:**

- MIWD filed a petition before the Supreme Court on November 9, 1995, seeking to annul the Court of Appeals' decision.

**Issues:**

1. **Jurisdiction:**

- Whether the RTC of Iloilo had jurisdiction over the petitions or if the NWRC held exclusive jurisdiction over the subject matter.

**Court's Decision:**

**1. Jurisdiction:**

- **Supreme Court Ruling:** The Supreme Court found merit in MIWD's petition and held that the RTC had jurisdiction.
- It differentiated between administrative and judicial questions, noting the petitions primarily raised judicial questions about violations of MIWD's rights as a water district.
- The petitions called for judicial interpretation and application of laws and the appropriateness of injunctive relief, not settling water rights but enforcing already granted rights.
- The Supreme Court found the cases *Abe-abe v. Manta* and *Tanjay Water District v. Gabaton* inapplicable, noting they involved disputes requiring NWRC's administrative expertise.

**Doctrine:**

- **Judicial Question Doctrine:** Where the issue is the enforcement of an already granted right, and not the primary grant of water rights, the regular courts hold jurisdiction.
- **Non-exhaustion of Administrative Remedies Exception:** If the matter involves a judicial question, the doctrine of exhausting administrative remedies is inapplicable.

**Class Notes:**

- **Key Aspects:**

1. **Judicial vs. Administrative Questions:** Know the distinction for determining appropriate jurisdiction.
2. **PD No. 198 (Local Water Districts):** Sections 31(a) and 32 address water district rights and remedies for interference.
3. **Water Code (PD No. 1067):** NWRC's authority primarily over appropriation and utilization disputes.
4. **Doctrine of Primary Administrative Jurisdiction:** Exceptionality when judicial interpretation precedes administrative proceedings.

- **Statutory Provisions:**

- **PD No. 198, Section 31:** Addresses water district authority over water use regulations.
- **PD No. 1067, Article 88:** Establishes NWRC's jurisdiction over water disputes.

**Historical Background:**

- **Context of Water Management Laws:** The establishment of water districts and provisions under PD 198 arose to regulate and ensure sustainable water use in local jurisdictions.
- **NWRC's Role:** Formulated under PD 1067 during Marcos era to centralize and arbitrate water appropriation disputes amid rising resource management needs in the Philippines.