

Title: National Grid Corporation of the Philippines vs. Getulia A. Gaité & Heirs

Facts:

1. On April 15, 2010, the National Grid Corporation of the Philippines (NGCP) filed a Complaint for Eminent Domain against Getulia A. Gaité and the Heirs of Trinidad Gaité before the Regional Trial Court (RTC) of Iligan City, aimed at acquiring portions of the respondents' property necessary for the construction of the Abaga-Kirahon 230 kV Transmission Line Project.
2. NGCP deposited PhP186,063.42 with the Landbank of the Philippines, equivalent to the full Bureau of Internal Revenue (BIR) zonal valuation, seeking possession of the property, and filed an Urgent Ex-Parte Motion for Issuance of Writ of Possession on August 24, 2010.
3. The RTC granted NGCP possession of the property on July 8, 2011, following a Writ of Possession in NGCP's favor.
4. In September 2012, a Board of Commissioners was appointed to determine the fair market value. They recommended a value of P60.00 per sqm based on nearby properties and corresponding sales data.
5. A dissenting report by Commissioner Atty. Raymundo Capistrano suggested a P300.00 per sqm valuation based on an unimplemented Ordinance and a sale between DPWH and another landowner.
6. On August 5, 2014, the RTC fully adopted Capistrano's report, ordering NGCP to pay PhP2,391,910.80 at P300.00 per sqm less the initial deposit, including a legal interest of 6% per annum.
7. The RTC denied NGCP's Motion for Reconsideration on June 17, 2015, and NGCP subsequently filed a Notice of Appeal.
8. The Court of Appeals (CA) dismissed NGCP's appeal on October 27, 2016, for failure to file an Appellant's Brief, refusing to reconsider even after NGCP filed the brief attached to a Motion for Reconsideration.
9. NGCP sought Supreme Court review, arguing both substantial injustice at the lower court's decision and error on the part of the CA in dismissing its appeal on procedural grounds.

Issues:

1. Did the Court of Appeals err in dismissing NGCP's appeal due to failing to file an Appellant's Brief?
2. Was the RTC's valuation for just compensation appropriate, or should the matter be reassessed under the law?

Court's Decision:

1. The Supreme Court held the CA has discretion in dismissing an appeal due to procedural deficiencies, not rendering dismissal mandatory, especially where justice is endangered by technicalities.
2. Reviewing the RTC's compensation determination, the Court found Atty. Capistrano's report lacked a reliable evidential basis - largely predicated on an unfinalized reclassification of land and an unrelated property sale.
3. The joint report's P60 per sqm valuation, anchored in actual sales data and relevant economic conditions, was deemed more accurate and just.

Doctrine:

1. Just compensation must be "just," real, substantial, fullest, requiring reliable data for it to be so.
2. Procedural rules must sometimes yield to the demands of equitable justice, and courts hold discretion in such determinations.

Class Notes:

- **Doctrines of Just Compensation**: Real, substantial, based on reliable data.
- **Appellate Discretion**: Court's discretion not mandatory dismissal for procedural flaws.
- **Legal Interest in Expropriation**: Reflects compensation for forbearance, ranging from 12% pre-July 1, 2013, transitioning to 6% post-date per statutory changes.

Historical Background:

The case underscores the procedural safeguards and substantive rights military expropriation, reflecting ongoing development and modernization efforts balanced against property rights in the Philippines. It highlights judicial emphasis on equitable outcomes over rigid procedural compliance amid national infrastructure expansion.