



August 21, 2015

VIA EMAIL (puc.commission@state.or.us) **and FIRST CLASS MAIL**

Public Utilities Commission of Oregon
3930 Fairview Industrial Drive SE
PO Box 2148
Salem, Oregon 97308

Re: *In the Matter of Sunriver Water LLC Request for Approval of an Affiliated Interest Agreement with Sunriver Environmental, LLC*
OPUC Docket No. UI 355
Consent Agenda Item No. 9 / August 25, 2015 Public Meeting Agenda

Dear Commissioners:

We enclose supplemental written comments from The Sunriver Owners Association regarding the above-referenced proceeding. Thank you in advance for your consideration.

Respectfully yours,


JOSH NEWTON *by sdm*
JN/sdm

Enclosure

cc: UI 355 Service List

5539.99\888472



MAINTAINING SUNRIVER AS A PREMIER RESIDENTIAL AND RESORT COMMUNITY PROTECTING AND ENHANCING ITS QUALITY OF LIFE,
NATURAL ENVIRONMENT AND PROPERTY VALUES.

August 20, 2015

VIA EMAIL (puc.commission@state.or.us) and FIRST CLASS MAIL

Public Utilities Commission of Oregon
3930 Fairview Industrial Drive SE
P.O. Box 2148
Salem, Oregon 97308

Re: August 25, 2015 Public Meeting Agenda
Consent Agenda Item No. 9: Sunriver Water LLC (Docket No. UI 355)
The Sunriver Owners Association – Supplemental Written Comments

Dear Commissioners:

I am the General Manager of The Sunriver Owners Association (“SROA”). SROA is an Oregon nonprofit corporation comprised of approximately 4,188 members. SROA is organized to provide for the management, maintenance, protection, and preservation of Sunriver, and to promote the health, safety, and welfare of its members, not for profit, but for the mutual advantages to be derived therefrom by the Consolidated Plan of Sunriver. SROA and its members constitute the substantial majority of the customers of applicant Sunriver Water LLC (“Sunriver Water”).

On behalf of SROA, I have filed two comment letters, dated April 29 and July 8, 2015 respectively, in this affiliated interest proceeding. I have also spoken with Commission staff members and have reviewed the staff report and recommendation, dated August 17, 2015, for this matter (“Staff Recommendation”) as well as earlier drafts of the Staff Recommendation that were provided to SROA by staff.

For the reasons set forth in my letters, SROA does not support waiver of OAR 860-036-0739(4)(e) or the Staff Recommendation. Earlier drafts of the Staff Recommendation had included the following alternative recommendation and proposed Commission motion:

As an alternative, if the Commission does not grant the waiver and approve the above amounts in Table 4, Staff proposes an annual charge of \$125 for the Reservoir Site and an annual charge of \$1,960 for the Office Space, previously discussed as the cost to the affiliate.”

SROA was prepared to support staff's alternative recommendation and motion, but staff removed it from the final version of the Staff Recommendation without notice or explanation to SROA. SROA requests that the Commission deny Sunriver Water's requested waiver of OAR 860-036-0739(4)(e) and instead approve the subject leases in accordance with that rule by adopting staff's alternative recommendation from its draft staff report at an annual charge of \$125 for the Reservoir Site and an annual charge of \$1,960 for the Office Space.

Based on Condition No. 2 in the Staff Recommendation, SROA understands that if the Commission nonetheless adopts the Staff Recommendation the Commission will be reserving the right to review the reasonableness of the subject leases in any future rate proceeding, including a full consideration of the issues that SROA has raised in this proceeding without prejudice. Accordingly, SROA does not object to this matter remaining on the Consent Agenda. SROA intends for this letter to be its final comment on the matter and does not intend to present any testimony even if the Commission were to reassign this matter to the Regular Agenda.

Thank you in advance for your consideration.

Respectfully yours,



Hugh Palcic,
General Manager
Sunriver Owners Association

cc: UI 355 Service List
SROA Board of Directors