

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UI 355

In the Matter of
SUNRIVER WATER COMPANY LLC
Request for Approval of an Affiliated
Interest Agreement with Sunriver
Environmental, LLC.

PETITION TO INTERVENE

The Sunriver Owners Association petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Hugh Palcic, General Manager
Company: Sunriver Owners Association
Street Address: 57455 Abbot Drive
City, State, Zip: Sunriver, Oregon 97707
Email Address: hughp@srowners.org
Telephone: 541 593 2411

Please include this contact on the service list.

2a. The petitioner will will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Josh Newton
Company: Karnopp Petersen LLP
Street Address: 1201 NW Wall St., Ste 200
City, State, Zip: Bend, OR 97701
Email Address: jn@karnopp.com
Telephone: (541) 382-3011

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Jeff Hinman
Company: Karnopp Petersen LLP
Street Address: 1201 NW Wall St., Ste. 200
City, State, Zip: Bend, OR 97701

Email Address: jsh@karnopp.com
Telephone: (541) 382-3011

Name: N/A
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

Petitioner is an Oregon nonprofit corporation comprised of approximately 4188 members. Petitioner 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 there from by the Consolidated Plan of Sunriver. (Articles of Incorporation of The Sunriver Owners Association, last amended September 15, 1997)

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

Petitioner and its members constitute the substantial majority of Sunriver Water's approximate population of 4,500 customers. Petitioner's interest in the proceeding is to ensure that any affiliated interest agreement approved by the Commission is fair and reasonable to SROA and its members and that Sunriver Water's affiliated interest agreement application complies with OPUC order no. 14-405.

5. The issues the Petitioner intends to raise at the proceeding are:

Petitioner intends to address whether Sunriver Water's proposed affiliated interest agreements are fair and reasonable and not contrary to SROA's or its members' interests and whether Sunriver Water's affiliated interest application is sufficient to comply with OPUC order no. 14-405. Petitioner also intends to assist, as appropriate, with the investigation of issues raised by Commission staff and other parties in the proceeding.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

Petitioner is the homeowners association for Sunriver and possesses significant institutional knowledge regarding the Sunriver community. Petitioner was also a party in OPUC docket no. UW 160, the resolution of which required Sunriver Water to file "a new affiliated interest agreement" in this proceeding. Petitioner

believes that it can assist the Commission in evaluating the fairness and reasonableness of Sunriver Water's affiliated interest agreement application.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Josh Newton
Petitioner or Petitioner's Representative

03/26/2015
Date Signed

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Petition to Intervene on:

Laurel Anderson
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308
laurel.anderson@state.or.us

Steven P. Hultberg
Radler White Parks & Alexander
P.O. Box 2007
Bend, Oregon 97709
shultberg@radlerwhite.com
of Attorneys for Sunriver Water LLC

Jason W. Jones
PUC Staff – Department of Justice
1162 Court Street, NE
Salem, Oregon 97301
jason.w.jones@state.or.us

by causing a full, true, and correct copy thereof to be sent via email at the above parties' email address on March 26, 2015.

DATED this 26th day of March, 2015.

KARNOPP PETERSEN LLP

/s/ Jeffrey S. Hinman
Josh Newton, OSB# 983087
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Association