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DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

October 5, 2017

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166
PUC.FilingCenter@state.or.us

Attn: Filing Center

Re: Docket No. UM 1818 – Staff's Errata Filing
DOJ File No. 860170/GB0168-17

Commission Staff hereby submits for filing the attached errata to the following Staff Reply Testimony:

- Staff/100, Gibbens-Rossow/6: correct meter number.

Sincerely,

Johanna M. Riemenschneider
Assistant Attorney General
Business Activities Section

JLM:Justice#8541616
Attachments

BASIS FOR COMPLAINT

1
2 **Q. Is there any indication that UEC has offered utility service in another**
3 **allocated territory?**

4 A. No. And, CBEC does not allege UEC has offered service in either its complaint or
5 its Opening Testimony.

6 **Q. Is there any indication that UEC has constructed utility service in another**
7 **allocated territory?**

8 A. No. And, CBEC does not allege UEC has constructed utility service in either its
9 complaint or its Opening Testimony.

10 **Q. Is there any indication that UEC has extended utility service into another**
11 **allocated territory?**

12 A. No. "Utility service" is defined in ORS 758.400(3). Looking at the portions of this
13 definition describing electric service, "utility service" means service provided by
14 any equipment, plant or facility for the distribution of electricity to users through a
15 connected and interrelated distribution system. In its Opening Testimony, CBEC
16 concedes that none of UEC's electric distribution facilities extend into Columbia
17 Basin's allocated service territory.⁷

18 **Q. Why does CBEC allege its allocated service territory has been violated?**

19 A. Willow Creek Dairy hired an electrical contractor to install electrical wiring
20 connecting the irrigation circles in CBEC's territory with UEC's meter 8465525, a
21 meter located in UEC's service territory.⁸ UEC installed this meter in 2016.⁹

⁷ Exhibit CBEC/100, Wolff/12.

⁸ Exhibit CBEC/108, Wolff/1, Greg te Velde Data Response Numbers 2 and 3 (5-26-2017 version).

⁹ Exhibit CBEC/100, Wolff/9, 22.

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