

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF OREGON  
Docket No. PCN-2

In the Matter of Tillamook People’s Utility District’s Petition for Certificate of Public Convenience and Necessity (PCN-2)	) ) )	Oregon Coast Alliance’s Response to Issues List
---	-------------	--

To the extent the preparation of the issues list was intended to identify relevant issues, ORCA does not object that the issues listed have been raised by the parties. ORCA incorporates by reference those issues that raised the issues listed below. To the extent that the preparation of the issues list was intended to indicate each party’s position, then ORCA either sets forth its own position as set forth in prior testimony or adopts the position of those parties in opposition to TPUD’s position. The number and order of the issues, as set forth below, is intended to mirror that of the issues list presented by TPUD.

- Compliance with OAR 860-025-0030 Filing requirements – No Comment
- OAR 860025-0030(1)(b): Information required to be in the Application under OAR 860-025-0005 – No Comment
- 0. Detailed Line Description – As set forth in ORCA’s comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD’s application.
- 1. Purpose of Proposed Transmission Line -As set forth in ORCA’s comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD’s application.
- 1.1. Necessity of Proposed Transmission Line – As set forth in ORCA’s comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD’s application.
- 1.2. Safety of proposed transmission line – As set forth in ORCA’s comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD’s application.
- 1.3. Practicability of proposed transmission line - As set forth in ORCA’s comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts

the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD's application.

- 1.4. Justification of proposed transmission line - As set forth in ORCA's comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD's application.
- 2. OAR 860-025-0030(1)(c): Spatial Information - As set forth in ORCA's comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD's application.
- 3. OAR 860-025-0030(1)(d): Cost of Information - As set forth in ORCA's comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD's application.
- 4. Financial feasibility information required under OAR 860-025-0030(1)(e) - As set forth in ORCA's comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD's application.
- 5. OAR 860-025-0030(1)(f): Information related to potential condemnation of property - As set forth in ORCA's comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer.
- 6. OAR 860-025-0030(1)(g): Information related to alternate route - As set forth in ORCA's comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD's application.
- 7. OAR 860-025-0030(1)(h): additional information - As set forth in ORCA's comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD's application.
- 8. OAR 860-025-0030(2) and (3): land use information - As set forth in ORCA's comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD's application.
- 8.1. Statewide Planning Goals – As set forth in ORCA's comments, ORCA believes that TPUD has not satisfied the applicable criteria. ORCA also adopts the comments of David and Doris Mast and Dan Aufdermaeuer or other party in opposition to TPUD's application.

Respectfully Submitted,

/s/ Sean Malone

Sean Malone (OR Bar # 084060)

259 E.5th Ave, Ste. 200-C  
Eugene, OR 97401  
Tel: (303) 859-0403  
Fax: (650) 471-7366  
[seanmalone8@hotmail.com](mailto:seanmalone8@hotmail.com)