



Oregon

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Public Utility Commission

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August 23, 2018

Via Electronic Filing and U.S. Mail

OREGON PUBLIC UTILITY COMMISSION
ATTENTION: FILING CENTER
PO BOX 1088
SALEM OR 97308-1088

RE: Docket No. WJ 34 – In the Matter of ASPEN LAKES UTILITY COMPANY, LLC, An Investigation Pursuant to ORS 756.515 to Determine Jurisdiction.

Enclosed for electronic filing is Staff Reply Testimony (100-104 and 200-205). A certificate of service, service list, are included with this filing.

Exhibit 104 is confidential and that information is being provided to parties who have signed Protective Order No. 18-152 via U.S. Mail.

/s/ Mark Brown

Mark Brown

Utility Program

Filing on Behalf of Public Utility Commission Staff

(503) 378-8287

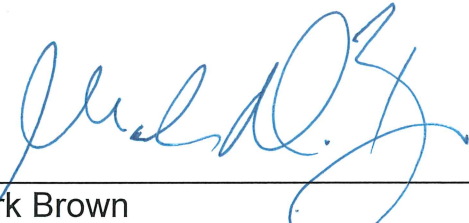
Email: mark.brown@state.or.us

CERTIFICATE OF SERVICE

WJ 34

I certify that I have this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-001-0180, to the following parties or attorneys of parties.

Dated this 23rd day of August, 2018 at Salem, Oregon.



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Public Utility Commission
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WJ 34
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**PUBLIC UTILITY COMMISSION
OF OREGON**

WJ 34

STAFF REPLY TESTIMONY OF

**JOAN GRINDELAND
SCOTT SHEARER**

**In the Matter of
ASPEN LAKES UTILITY COMPANY, LLC,
An Investigation Pursuant to ORS 756.515
to Determine Jurisdiction.**

**REDACTED
August 23, 2018**

CASE: WJ 34
WITNESS: JOAN GRINDELAND

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 100

Reply Testimony

August 23, 2018

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Joan Grindeland. I am a Utility Analyst employed in the
3 Telecommunications and Water Division of the Public Utility Commission of
4 Oregon (OPUC). My business address is 201 High Street SE, Suite 100, Salem,
5 Oregon 97301.

6 **Q. Please describe your educational background and work experience.**

7 A. My witness qualification statement is found in Exhibit Staff/101.

8 **Q. What is the purpose of your testimony?**

9 A. The purpose of my testimony is to provide the Commission with a
10 recommendation as to whether Aspen Lakes should become rate regulated.

11 **Q. Did you prepare any exhibits for this docket?**

12 A. Yes. I prepared Exhibit Staff/101, consisting of 1 page, Exhibit Staff/102
13 consisting of 12 pages, Exhibit Staff/ 103 consisting of 9 pages, and Confidential
14 Exhibit Staff/104 consisting of 9 pages.

15 **Q. How is your testimony organized?**

16 A. My testimony is organized as follows:

17	Issue 1 – Introduction and Summary Recommendation.....	2
18	Issue 2 – Requirements For Rate Regulation.....	5
19	Issue 3 – Calculation of the Annual Average Monthly Rate	6
20	Issue 4 – Other Considerations.....	10
21	Issue 5 – Staff’s Recommendation.....	12

22 **Q. Who is testifying in this docket?**

23 A. I am testifying as the primary Staff witness. Mr. Scott Shearer will provide
24 additional testimony in Staff/200 regarding the validity of customer petitions
25 received and the relevance of prior petitions.

ISSUE 1 – INTRODUCTION AND SUMMARY RECOMMENDATION

1
2 **Q. Please provide a brief summary of the procedural background of this**
3 **docket.**

4 A. On January 22, 2018, Aspen Lakes Estate Owners, Inc. (HOA), the
5 homeowner's association for the development served by Aspen Lakes Utility
6 (Aspen Lakes or Company), filed a petition for rate regulation with the
7 Commission. In their petition, customers requested that the Commission
8 assert rate regulation over the Company because the Company was charging
9 in excess of the threshold set by OAR 860-036-1910,¹ more than 20 percent of
10 customers petitioned the Commission for rate regulation,² and the petitions
11 were timely filed.³ The HOA also questioned whether the rates charged by the
12 Company are fair, just and reasonable, non-discriminatory, and based on
13 principles of cost-causation.⁴ On January 26, 2018, the HOA filed an
14 Amended Petition to include redacted exhibits.

15 On February 15, 2018, Aspen Lakes filed a response to the HOA's
16 Petition. In its response, Aspen Lakes denied that the Company's rates were
17 discriminatory and not transparent, and recommended that the Commission
18 reject the HOA petition for rate regulation because applicable statutory and rule

¹ Aspen Lakes Estate Owners' (HOA) Amended Petition at 3-4. Staff notes that the HOA amended its Petition on January 26, 2018, to include redacted exhibits. The substance of the original petition did not change.

² HOA Amended Petition at 4.

³ HOA Amended Petition at 4-7.

⁴ HOA Amended Petition at 1.

1 requirements are not met, the petition was untimely, and the petitions from
2 customers were unverified.⁵

3 Aspen Lakes, the HOA, and Staff agreed to a procedural schedule in this
4 case that would allow for the development of a factual record and for the
5 parties to add facts to the record, make policy recommendations and legal
6 arguments and to provide recommendations to the Commission.

7 **Q. Please provide a brief summary of Aspen Lakes Utility and the services it**
8 **provides.**

9 A. Aspen Lakes provides domestic and irrigation water services to the Aspen Lakes
10 development, located in the vicinity of Sisters, Oregon. Aspen Lakes serves 117
11 residential lots in the Aspen Lakes development; 80 residential customers are
12 connected to the Company's distribution system and pay the full rate for water
13 service and the remainder were undeveloped lots charged \$22 per month for
14 stand-by fire service, regardless of whether the lot is developed or receives other
15 water service.⁶ The Company also serves two commercial domestic customers
16 and two commercial irrigation customers.⁷ The commercial customers include a
17 golf course and the HOA recreation facility and pool.⁸

18 Most Aspen Lakes residents are provided with domestic and residential
19 irrigation service through separate, one-inch pipes with the exception of one or
20 two customers who are provided water for domestic and irrigation purposes from

⁵ Answer of Aspen Lakes Utility Company, LLC to Amended Petition (Aspen Lakes Answer) at 1-2.

⁶ Staff/102 - Aspen Lakes' response to Staff Data Request 2.

⁷ Staff/102 - Aspen Lakes' response to Staff Data Request 1.

⁸ *Id.*

1 the same one inch pipe.⁹ The monthly residential domestic and irrigation base
2 rate for each one-inch meter is \$22.00, with a 3,000 gallon monthly allowance for
3 domestic use.¹⁰ There is a \$2.00 charge for each 1,000 gallons of additional
4 domestic water used.¹¹ Customers are also charged \$2.00 for per 1,000 gallons
5 used for irrigation with no base rate charge.¹²

6 Aspen Lakes also charges each lot in the community (whether developed or
7 not) a stand-by fire protection charge fee of \$22 per month that covers the
8 expenses for constructing and maintaining the community's fire hydrants and
9 associated facilities.¹³ According to Aspen Lakes, the \$22 stand-by fire protection
10 charge is "often combined on invoices and show[s] as a monthly charge of \$44"
11 when combined with the residential base rate.¹⁴

12 **Q. Please summarize Staff's recommendation in this case.**

13 A. Staff recommends that the Commission assert rate regulation over Aspen Lakes,
14 and order the Company to file a general rate case within 60 days of its order
15 asserting rate regulation. Staff has reviewed the Company's rates, terms, and
16 conditions of service, and the petitions filed by customers. Staff's testimony
17 demonstrates that the Company's rates are in excess of the threshold set by
18 OAR 860-036-1910 and that between 28 and 51 percent of customers have

⁹ Aspen Lakes' Answer at 2 provides that two developed residential lots are serviced by one, one inch line that provides both domestic and irrigation service. Aspen Lakes' response to Staff Data Request 1 (Staff/102) provides that all but one residential customer has separate lines for domestic and irrigation water. All residential and commercial services are provided through 1-inch meters.

¹⁰ Aspen Lakes Answer at Exhibit A, pg. 3; Staff/102 - Aspen Lakes' response to Staff DR 5 and DR 6.

¹¹ Aspen Lakes Answer at Exhibit A, pg. 3; Staff/102 - Aspen Lakes' response to Staff DR 5 and DR 6.

¹² Aspen Lakes Answer at Exhibit A, pg. 3; Staff/102 - Aspen Lakes' response to Staff DR 5 and DR 6.

¹³ Aspen Lakes Answer at 3; Staff/102 - Aspen Lakes' response to Staff DR 2.

¹⁴ Staff/102 - Aspen Lakes' response to Staff DR 6.

1 submitted timely, valid petitions for rate regulation¹⁵. Staff also finds that rate
2 regulation is in the public interest. Staff also finds that its recommendation is
3 consistent with relevant statutory requirements, but will address this issue further
4 in briefing.

5 **ISSUE 2 – REQUIREMENTS FOR RATE REGULATION**

6 **Q. Please explain the requirements for the Commission to assert rate**
7 **regulation.**

8 A. For water utilities providing service to fewer than 500 customers, ORS 757.061
9 provides that water utilities are subject to rate regulation if the rate proposed to be
10 charged exceeds the threshold amount established by Commission rule, and if
11 20 percent or more customers petition the Commission requesting rate regulation.

12 In OAR 860-036-1910, the Commission adopted the annual average monthly
13 charge threshold rates for both residential and commercial customers based on
14 whether service is metered or unmetered. The threshold for metered “residential
15 service,” which is defined as “water service provided for domestic or irrigation
16 purposes in a residential area and is not considered a commercial service,”¹⁶ is
17 \$45 if provided via a one inch pipe.¹⁷ For metered residential service provided
18 through a pipe with a diameter greater than one inch, the threshold is \$128.¹⁸
19 The same thresholds apply to metered commercial service.

¹⁵ Staff/205 Shearer at 1-5.

¹⁶ OAR 860-036-1910(2).

¹⁷ OAR 860-036-1010(7).

¹⁸ OAR 860-036-1910(4).

1 In this case, Aspen Lakes provides metered service to its residential
2 customers via a one inch line, meaning that the \$45 annual average monthly rate
3 threshold would apply for the purposes of this case.

4 **Q. Is there a timing restriction on when the Commission can assert rate**
5 **regulation?**

6 A. Staff intends to address the applicable legal standards in briefing, but it is my
7 understanding that there is no requirement as to when the Commission can
8 assert rate regulation if the public water utility, serving fewer than 500 customers,
9 is charging above the rate threshold and 20 percent or greater of customers have
10 petitioned for such treatment.

11 As discussed in Staff Witness Scott Shearer's testimony, the Commission's
12 Division 36 rules address timing requirements for utility notice of a proposed rate
13 increase and requirements for petition collection, but these requirements are not
14 informative or dispositive in this case.

15 **ISSUE 3 – CALCULATION OF THE ANNUAL AVERAGE MONTHLY RATE**

16 **Q. Please explain the methodology Staff uses to calculate the annual average**
17 **monthly rate.**

18 A. In order to determine the annual average monthly rate, Staff first includes any
19 base charge made to the customer, including a base charge for a specified
20 amount of water usage. Next, Staff calculates the amount that is based on the
21 annual total gallons of use (minus an amount for leakage) that is above the usage
22 included in the base charge. That amount is then multiplied by the usage rate,
23 divided by the number of customers, and then divided by 12 in order to obtain an

1 annual monthly average charge for that usage. The base charge and calculated
2 monthly average are then added together. If customers are required to pay other
3 charges as customers of the utility, Staff's practice has been to include those
4 charges in its calculation, so as to ensure that the calculation of the annual
5 average monthly charge calculation includes all services for which residential and
6 commercial customers are required to pay, regardless of how they are reflected
7 on customers' bills.

8 **Q. How did Staff calculate the annual average monthly rate in this case?**

9 A. Staff calculated the annual average monthly rate by considering all rates charged
10 for service which includes base rate commodity rates for domestic service and
11 stand-by fire protection. These rates include a base rate of \$22 per month for
12 residential service with a 3,000 gallon monthly allowance for domestic use and a
13 \$2.00 charge for each 1,000 gallons of additional domestic water used plus a
14 charge of \$2.00 for per 1,000 gallons used for irrigation, and a charge of \$22 per
15 month for fire protection. Using the consumption data provided by the Company
16 from April 1, 2017 through April 1, 2018,¹⁹ the total commodity charges billed to
17 domestic and irrigation customers was \$55,601.73.

18 Because the undeveloped lots are charged \$22 for stand-by fire protection,
19 which appears to Staff to be a required (i.e., not optional) charge, Staff calculated
20 the average annual monthly usage based on the 117 lots that pay for service with
21 the Company. Using this methodology, the monthly average for water usage only
22 is \$39.60. That combined with the base rate of \$22 per month plus the \$22 per

¹⁹ Aspen Lakes Answer at Exhibit A, pg. 3; Staff/102 - Aspen Lakes' response to Staff DR 5 and DR 6.

1 month stand-by fire protection charge puts the monthly rate at \$83.60, above the
2 \$45 threshold. However, even if the \$22 per month fire protection rate were not
3 included in the calculation, the average monthly rate would still be \$39.60 for the
4 commodity rate plus the \$22 per month base rate for a total of \$61.60, which is
5 well over the \$45 threshold. Staff notes that this is the most conservative
6 methodology to calculate the annual average monthly rate. If the \$22 stand-by
7 fire protection charge were excluded from the calculation, meaning that the
8 calculation would utilize 80 customer lots, the annual average monthly charge
9 would be \$57.92 for the commodity rate plus the \$22 base rate for a total of
10 \$79.92.

11 **Q. Please summarize Staff's understanding of how Aspen Lakes interprets the**
12 **calculation of the annual average monthly rate.**

13 A. Aspen Lakes appears to argue that because customers are served from two
14 separate one inch meters, the Commission should apply the rate applicable to
15 service provided from lines greater than one inch. For metered service, this is
16 \$128. Aspen Lakes further argues that the \$22 fire protection charge should not
17 be included in the calculation because it is "not a rate charged for 'water service'
18 as that term is used in ORS 757.061 or OAR Division 36."²⁰ Applying this
19 methodology, the Company argues that the average annual monthly customer
20 charges for domestic and irrigation service do not exceed the applicable \$128
21 threshold.²¹

²⁰ Aspen Lakes Answer at 3.

²¹ *Id.*

1 **Q. Does Staff agree with the methodology applied by the Company?**

2 A. No. Staff disagrees with the methodology applied by the Company in two ways.

3 First, Staff finds that the applicable rate threshold to apply is \$45, which is the
4 threshold that applies to residential water service provided through one-inch or
5 smaller pipes. Staff does not agree that it is appropriate to combine the two one-
6 inch meters and apply the larger, \$128 threshold simply because customers are
7 provided domestic service through different pipes than residential irrigation
8 service. Such treatment would put residential customers on unequal footing, as
9 at least one customer (and perhaps two developed residential lots) are served by
10 a single one-inch meter for both domestic and irrigation service. The Company
11 does not explain why such disparate treatment is appropriate, nor does it provide
12 relevant prior Commission precedent that would support such treatment. Staff
13 agrees with the HOA's contention that the customers could receive their water
14 through a single, one-inch meter and that the two meter system appears to be a
15 convenience to the Company, but not a necessity for service.²²

16 Second, as discussed more fully below, Staff disagrees that the \$22 stand-
17 by fire charge should not be included in the calculation. This fee has been, and
18 continues to be, charged on a monthly basis to all lots, regardless of whether the
19 lots take any other type of service, and has been rolled into the customers' base
20 rate in at least some instances.²³ Further, this fee has been charged and paid,
21 with customers never considering it to be optional.²⁴

²² Aspen Lakes Answer at 3.

²³ Staff/102 – Aspen Lakes' response to Staff DR 6.

²⁴ *Id.*

1 **Q. Please respond to the calculation scenarios provided by the HOA.**

2 A. HOA Witness Mr. Thompson sets forth several options that could be used to
3 calculate the annual average monthly rate.²⁵ Each option results in a rate that is
4 greater than the \$45 threshold adopted by the Commission. Although Staff's
5 methodology for calculation is described above, and differs from the scenarios
6 provided, Staff notes that Mr. Thompson's calculations are generous in their
7 assumptions of the total amounts billed for both domestic and irrigation water. In
8 all scenarios provided, the average monthly bill was above the rate regulation
9 trigger amount of \$45 per month.

10 **ISSUE 4 – OTHER CONSIDERATIONS**

11 **Q. Are there other considerations or facts that Staff found compelling in**
12 **analyzing this case?**

13 A. Yes. Staff finds that in addition to the requirements of rate regulation being met,
14 the HOA's assertions of potentially preferential billing treatment of certain
15 customers, shared ownership interests of Aspen Lakes and the golf course
16 customer,²⁶ and the overwhelming amount of customers requesting rate
17 regulation also support the Commission's determination that rate regulation is
18 appropriate in this case.

19 The issue of the Golf Course and Aspen Lakes Development Lots being
20 charged at a different rate (or money for the service not being collected) was

²⁵ HOA/200, Thompson/2-3.

²⁶ Staff/102 – Aspen Lakes Response to Staff DR 9.

1 introduced in the HOA's Petition²⁷ and brought up again in the HOA's opening
2 testimony.²⁸ After review of the billing spreadsheets provided by the Company,
3 Staff submitted a discovery request to Aspen Lakes in an attempt to clarify
4 charges and payments related to the Golf Course,²⁹ as well as a data request
5 regarding the lack of stand-by fire service charges for four Aspen Lakes
6 Development lots since 2014.³⁰ In answer to these requests, the Company
7 clarified the invoice line items in question. However, in doing so more
8 irregularities appeared concerning the repayment of sums transferred from the
9 Golf Course and Aspen Lakes. Staff will be sending out additional DRs to the
10 Company to clarify these issues.

11 Staff also has questions regarding the sudden appearance of general
12 journal entries for offsetting accounts payable to the golf course for office rent and
13 bookkeeping services against accounts receivable from the golf course for water
14 invoices.³¹ Staff will be issuing additional discovery requests requesting
15 clarification of these issues. This is especially pertinent in light of the question of
16 potential affiliated interests between the Company, the Golf Course, and Aspen
17 Lakes Development being raised in the HOA opening testimony.³²

18 Although the Commission need not make a determination on the billing
19 treatment of certain customers and the relationship between Aspen Lakes and the

²⁷ HOA Amended Petition at 1.

²⁸ HOA/100, Fadeley/3.

²⁹ Staff/102 – Aspen Lakes' response to Staff DR 10.

³⁰ Staff/102 – Aspen Lakes' response to Staff DR 11.

³¹ Staff/102 – Aspen Lakes' response to Staff DR 10.

³² HOA/200, Thompson/5.

1 golf course in this case, these are both issues that Staff would investigate in a
2 general rate case. In addition, as discussed in Mr. Shearer's testimony, an
3 overwhelming number of customers, between 28 and 51 percent³³ have
4 requested rate regulation, which Staff finds compelling.

5 **ISSUE 5 – STAFF'S RECOMMENDATION**

6 **Q. What is Staff's recommendation in this case?**

7 A. For the reasons stated above as well as those covered in the testimony of
8 Mr. Shearer, Staff recommends that the Commission:

- 9 • Find that the \$45 annual average monthly threshold should be used in this
10 case;
- 11 • Find that the Company's annual average monthly rate exceeds the \$45
12 threshold;
- 13 • Find that at least twenty percent of the customers petitions submitted are valid;
- 14 • Assert rate regulation over Aspen Lakes;
- 15 • Order the Company to file a general rate case in compliance with
16 OAR 860-036-2020 within 60 days of the Commission's order.

17 **Q. Does this conclude your testimony?**

18 A. Yes.

³³ Staff/205 Shearer at 1-5.

CASE: WJ 34
WITNESS: JOAN GRINDELAND

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 101

Witness Qualification Statement

August 23, 2018

WITNESS QUALIFICATION STATEMENT

NAME: Joan Grindeland

EMPLOYER: Public Utility Commission of Oregon (OPUC)

TITLE: Utility Analyst
Retail Telecom & Water Regulation

ADDRESS: 201 High Street SE. Suite 100
Salem, OR 97301

EDUCATION: Bachelor of Science, Environmental Studies, Huxley
College, Western Washington University

EXPERIENCE: Employed with the OPUC since 2014; currently a Utility
Analyst for Retail Telecom & Water Regulation

Prior to employment with the OPUC, I held various
positions, including: Manager at Lake Forest Park
Water District; Resource Management Supervisor at
Franklin County PUD; Officer Manager/Supervisor at In-
Gas, Inc. propane distribution subsidiary for Inland
Power and Light; Office Administrator for EA
Engineering, Science and Technology; Administrative
Manager at Summit Cablevision; and Administrative
Support Specialist for Salem Keizer School District.

CASE: WJ 34
WITNESS: JOAN GRINDELAND

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 102

**Exhibits in Support
Of Reply Testimony**

August 23, 2018

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

Docket WJ 34

In the Matter of)	RESPONSES OF ASPEN LAKES
)	UTILITY COMPANY, LLC TO PUBLIC
Request for Rate Regulation of Aspen Lakes)	UTILITY COMMISSION'S FIRST SET
Utility, LLC)	OF DATA REQUESTS
)	

DR-1. For each schedule listed below, please provide for each month of the most recent twelve months of data available: 1) the actual usage and amounts billed for each customer, 2) the total usage and amount billed for the schedule listed for each month, and 3) the number of customers for the schedule listed for that month:

- a. Schedule No. 1 – residential domestic service – 1-inch meter
- b. Schedule No. 1 – residential irrigation service – 1-inch meter
- c. Schedule No. 2 – commercial domestic service – 1-inch meter
- d. Schedule No. 2 – commercial irrigation service – 1-inch meter
- e. Schedule No. 1 – residential domestic service – greater than 1-inch meter
- f. Schedule No. 1 – residential irrigation service – greater than 1-inch meter
- g. Schedule No. 2 – commercial domestic service – greater than 1-inch meter
- h. Schedule No. 2 – commercial irrigation service – greater than 1-inch meter
- i. Schedule No. 3 – charges to customers with a 1-inch meter
- j. Schedule No. 3 – charges to customers with a greater than 1-inch meter

Answer: The raw data in response to sub-requests one and two is contained in the account statements produced as Bates Nos. ALU_000198-000488. A spreadsheet response summarizing the data will be provided on a separate sheet. The number of customers for each schedule over the last twelve months has not changed and is as follows:

- a. Schedule No. 1 – residential domestic service – 1-inch meter: 80
- b. Schedule No. 1 – residential irrigation service – 1-inch meter: 79
- c. Schedule No. 2 – commercial domestic service – 1-inch meter: 0
- d. Schedule No. 2 – commercial irrigation service – 1-inch meter: 0
- e. Schedule No. 1 – residential domestic service – greater than 1-inch meter: 0
- f. Schedule No. 1 – residential irrigation service – greater than 1-inch meter: 0
- g. Schedule No. 2 – commercial domestic service – greater than 1-inch meter:

Aspen Lakes Golf Course, LLC: 3 inch plus
Aspen Lakes Homeowners Association: 2 inch

- h. Schedule No. 2 – commercial irrigation service – greater than 1-inch meter: 2
- i. Schedule No. 3 – charges to customers with a 1-inch meter: 80
- j. Schedule No. 3 – charges to customers with a greater than 1-inch meter: 2

DR-2. Are customers required to pay the \$22/month fire charge as a condition of receiving service? Is failure to pay for this charge considered grounds for disconnection?

Answer: Receiving residential or commercial service is not conditioned upon paying the charge for Stand-by Fire Protection and residential or commercial service is not disconnected for failure to pay the Stand-by Fire Protection charge. The \$22 per month Stand-by Fire Protection charge is not related to receiving either domestic or irrigation service. All properties within the development are billed for this service regardless of whether they have domestic or irrigation water service. The Stand-by charge helps pay for the minimum maintenance on the fire protection system and helps keep it operational in the event there is a fire on any of the properties serviced. The system is overbuilt to accommodate fire flows that were not a development condition. The expanded fire capabilities have allowed the community to obtain an ISO rating of 3, which results in substantially lower fire insurance for the properties within the service area. It should be noted that this provides the fire department, and/or each customer equally, with access to a 6" service with a fire hydrant.

DR-3. How many residential customers also receive separate irrigation service (for non-commercial purposes)?

Answer: All residential customers, except one (Lot 42, Bates Nos. ALU_000315-6), have a separate irrigation service with a separate meter. The exception is due to the proximity to the golf course distribution system and the corresponding difficulty in serving the customer from the irrigation source. There will likely be two other customers with a single service when the community is built out. The current service count is: two commercial customers with separate service for irrigation, seventy-nine residential customers with separate irrigation service, and one residential customer with a single service for both domestic and irrigation service.

DR-4. Are the residential domestic and irrigation systems served by separate sources of water?

Answer: Yes. The residential domestic is served primarily from a small well that produces about 200 gpm. The irrigation is served via a 2,000 gpm well that provides water to a pond on the golf course that is then pressurized into the golf course irrigation system, which also serves the irrigation needs of the residential community. The exception is that the two wells are interconnected so that the irrigation well can provide fire flows and serve as an emergency backup to the domestic well.

DR-5. Please describe, with references to the Company's tariffs, how residential customers are charged for residential irrigation service. In your response, please address whether there is a separate meter charge for residential irrigation and residential domestic services.

Answer: Customers are charged separately but billed together for both domestic and irrigation usage. Domestic use is charged a \$22 base rate that includes the first 3,000 gallons per month, plus \$2 per 1,000 gallons over the base allowance. Irrigation has no base rate and is billed at \$2 per 1,000 gallons used.

DR-6. Please verify what meter sizes are used for residential irrigation and the corresponding charges for the meters, if any.

Answer: The standard meter size for each residential irrigation service is 1 inch. There is a single \$1,000 meter installation charge that includes both the domestic service and irrigation service meters. There is no separate Monthly Base Rate charge for the irrigation service meter but the water usage is billed at \$2 per 1,000 gallons. There is a \$22 Monthly Base Rate charge for the domestic service. Completely separate from the \$22 Monthly Base Rate charge on Schedule No. 1 for domestic service, there is a Schedule No. 3 Monthly Base Rate charge of \$22 for Stand-By Fire Protection. These two \$22 charges are often combined on invoices and show as a monthly charge of \$44. (*See, e.g.* Bates No. ALU_000211, line item 01/05/2017 “Residential Water, 12@\$44.00=528.00.”)

DR-7. Please provide a complete customer list that includes Name, Service Address, and Service Type. If a customer has multiple Service Addresses and/or Service Types, please list each address and service provided.

Answer: The current customer list is produced as Bates Nos. ALU_000489-000496. The type of service is identified in the far left column. Service is either "Com" for commercial domestic and separate commercial irrigation service, "Dom & Irr" for residential domestic service and separate irrigation service, and "Standby" for only Stand-by Fire Protection service with no commercial or residential water service (these are empty lots).

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

Docket WJ 34

In the Matter of)	RESPONSES OF ASPEN LAKES
)	UTILITY COMPANY, LLC TO PUBLIC
Request for Rate Regulation of Aspen Lakes)	UTILITY COMMISSION'S SECOND SET
Utility, LLC)	OF DATA REQUESTS
)	

DR-8. On page 3 of Aspen Lakes Utility Company's Answer to the Amended Petition, the Company, regarding the stand-by fire protection fee, states:

This is not a rate charged for "water service" as that term is used in ORS 757.061 or OAR Division 36, and therefore, should not be used as that term is used in calculating rates applicable to the threshold amount.

Please explain the Company's rationale for making that statement.

Answer: The term "water service" is not expressly defined in ORS Chapter 757 or in OAR Chapter 860, Division 36. However, two categories, and only two categories, of water service are defined in OAR 860-036-1010 for "Commercial service" and "Residential service." These are:

(2) "Commercial service" means water service provided by the water utility that the customer uses in the promotion of a business or business product that is a source of revenue or income to the customer or others using the premises.

(7) "Residential service" means water service provided for domestic or irrigation purposes in a residential area and is not considered a commercial service.

A pressurized system of fire hydrants that supply water only in a fire emergency does not fall under the definition of either Commercial or Residential service.

Further, the only reference to fire suppression that Aspen Lakes Utility was able to locate in the Commissions regulations relates to a utility's ability to temporarily reduce or increase water presser for fire flows in OAR 860-035-1650.

Finally, the methodology for determining the threshold levels for rate regulation in OAR 860-036-1910 do not contemplate how the Stand-by Fire Protection charge would be evaluated. The fire hydrants are connected to the eight-inch mainline through a six-inch line but the hydrants do not serve any specific customer, but are used by the community as a whole and available to the entire district for the purpose fire protection and reduction of insurance costs.

Thus, the term “water service” and the calculations to determine the rate regulation threshold in the statutes and regulations appear limited to lateral service directly to customers for either Commercial or Residential purposes, and not for stand-by fire protection services.

DR-9. Please describe the relationship between each of the entities listed below. In each case, please provide information including, but not limited to 1) any ownership interest in one entity by the other, 2) any ownership interest by third party in both of the entities listed, and 3) any form of oversight that may be exercised by one entity over the other through bylaws or any other form of agreement or organizational structure.

- a. Aspen Lakes Utility Company and the Aspen Lakes Golf Course,
- b. Aspen Lakes Utility Company and Aspen Lakes Development, and [sic]

Answer:

- a. Aspen Lakes Utility Company and the Aspen Lakes Golf Course are both limited liability companies owned by the Cyrus family. The golf course is a customer of the utility company.
- b. Aspen Lakes Utility Company and Aspen Lakes Development are both limited liability companies owned by the Cyrus family. Aspen Lakes Development is a land holding company that has since changed its name to Aspen Investments, LLC. At the request of a lender, the land under the golf course was split off from Aspen Investments and held by Wildhorse Meadows, LLC. This entity charges the utility company for the lease of its land where the wells and distribution system are located.

DR-10. Please provide details regarding the following credits to the Golf Course account;

- a. 09/01/2015 PMT (no check number or description provided on statement)
- b. 09/22/2015 PMT #25000.00 (actual amount paid, no description provided)
- c. 08/08/2016 PMT #EFT (no description)
- d. 04/04/2017 PMT #Transfer (no description)
- e. 04/14/2017 PMT #Transfer (no description)
- f. 06/25/2017 PMT (no description)
- g. 06/26/2017 PMT (no description)
- h. 06/29/2017 PMT (no description)
- i. 12/31/2017 GENJRNL (no description)
- j. 12/31/2017 GENJRNL to clear up a/P and A/R (please elaborate)

Answer:

- a. \$4,945.96 was payment of invoice #4993 for \$1,100 and the open balance on invoice #4674 for \$3845.96.
- b. Utility borrowed \$25,000 from golf course to cover operating expenses.
- c. \$1,500 partial payment via automatic funds transfer for invoice number #4945.
- d. Don't find record of payment on this date. We show a payment on 4/7/17 of \$1,000 to Utility for partial payment of invoice #5006.
- e. \$1,200 payment on #5006 for \$100 and #5009 for \$1,100.
- f. We show no records for 6/25, but show a payment on 6/5/17 for \$2,200 for invoice #6347 and #6348.
- g. We show no records for 6/26/17, but show a payment on 6/23/17 for \$3,300 for invoices #6002, #6100, and #6346 each in the amount of \$1,100.
- h. \$1,000 partial payment on invoice #4946.
- i. General Journal entry for \$20,566.42 to clear offsetting balance on notes payable (under b. above) to the golf course against the accounts receivable from the golf course.
- j. General Journal entry for \$13,176.12 for offsetting accounts payable to the golf course for office rent and bookkeeping services against accounts receivable from the golf course for water invoices.

DR-11. Please explain why the four listed accounts for Aspen Lakes Development show no payments since 2014. (ALU pages 000459, 000467, 000486, and 000487)?

Answer: The four lots represented by the accounts listed on ALU_ 000459, 000467, 000486, and 000487 are empty residential lots whose utility accounts were held by the developer of the Aspen Lakes planned community, formerly Aspen Lakes Development, LLC, and now named Aspen Lakes Investment, LLC. The properties have no water service and are only charge the Stand-by Fire Protection charge. At various times through project development, Aspen Lakes Development has experienced cash flow deficits that delay its ability to make payment of these charges. In such situations, the Stand-by Fire Protection charges on these properties continue to accumulate and if not otherwise paid, should be paid out of closing when the lots sell.

CASE: WJ 34
WITNESS: JOAN GRINDELAND

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 103

**Exhibits in Support
Of Reply Testimony**

August 23, 2018

COMMODITY RATES ONLY

4-1-2017 to 7-1-2017

domestic \$ 1,673.92
irrigation \$ 26,773.08

7-1-2017 to 10-1-2017

domestic \$ 927.38
irrigation \$ 25,180.46 less sewer \$ 2,703.98 \$ 22,476.48

10-1-2017 to 1-1-2018

domestic \$ 327.28
irrigation \$ - less sewer 0

1-1-2018 to 4-1-2018

domestic \$ 236.30
irrigation \$ 3,389.79 less sewer \$ 202.50 \$ 3,187.29

Total commodity charges	\$ 55,601.73	Total commodity rates per billing spreadsheet
Divide by 12 months	\$ 4,633.48	Per month average commodity rate only
Divided by 117 lots	\$ 39.60	Average commodity rate by all 117 lots
Divided by 80 lots	\$ 57.92	Average commodity rate by 80 lots (currently being served)

Lot #	Domestic Reading		Domestic Usage	Net Less 8K GAL	Rate	3 months Base Rate	Total Billed	Lot #	Irrigation		Irrigation Usage	Rate	2016 BILL SEWER FEES
	4/1/2017	7/1/2017							4/1/2017	7/1/2017			
1	1,261,090	1,275,140	14,050	5,090	0.0020	\$ 66.00	\$ 66.00	1	6,911,720	7,329,370	417,650	0.0020	835.30
2	184,050	188,070	4,040	-4,860	0.0020	\$ 66.00	\$ 66.00	2	3,569,488	3,842,950	73,502	0.0020	\$ 147.00
3	293,610	295,840	2,330	-6,670	0.0020	\$ 66.00	\$ 66.00	3	6,075,190	6,233,290	158,100	0.0020	\$ 316.20
4	169,360	173,810	7,450	-1,550	0.0020	\$ 66.00	\$ 66.00	4	2,655,660	2,711,880	56,220	0.0020	\$ 112.44
5	3,477,490	3,508,420	20,930	21,930	0.0020	\$ 43.66	\$ 66.00	5	6,260,430	6,499,440	239,010	0.0020	\$ 478.02
6	0	0	0	-9,000	0.0020	\$ -	\$ -	6	0	0	0	0.0020	\$ -
7	1,128,500	1,138,720	10,220	1,220	0.0020	\$ 66.00	\$ 66.00	7	3,717,110	3,872,610	155,500	0.0020	\$ 311.00
8	317,820	323,240	5,420	-3,580	0.0020	\$ 66.00	\$ 66.00	8	4,335,260	4,522,350	187,130	0.0020	\$ 374.28
9	2,331,720	2,338,660	4,940	-4,060	0.0020	\$ 66.00	\$ 66.00	9	6,703,010	6,992,590	289,580	0.0020	\$ 579.16
10	597,220	596,400	9,180	180	0.0020	\$ 66.00	\$ 66.00	10	4,950,550	5,229,570	289,020	0.0020	\$ 578.04
11	622,230	633,240	11,110	2,110	0.0020	\$ 66.00	\$ 66.00	11	3,701,280	3,833,050	131,770	0.0020	\$ 263.54
12	181,160	184,030	2,870	-6,130	0.0020	\$ 66.00	\$ 66.00	12	8,864,850	9,131,590	266,730	0.0020	\$ 533.46
13	1,469,310	1,471,120	1,810	-7,190	0.0020	\$ 66.00	\$ 66.00	13	2,088,890	2,234,690	145,700	0.0020	\$ 291.40
14	2,653,820	2,668,570	14,750	5,750	0.0020	\$ 11.50	\$ 66.00	14	1,432,260	1,570,330	168,070	0.0020	\$ 336.14
15	512,780	521,080	8,330	-670	0.0020	\$ 66.00	\$ 66.00	15	3,389,230	3,527,910	138,680	0.0020	\$ 277.38
16	0	0	0	-9,000	0.0020	\$ -	\$ -	16	0	0	0	0.0020	\$ -
17	890,210	910,770	20,560	11,560	0.0020	\$ 23.12	\$ 66.00	17	3,810,700	3,948,510	135,810	0.0020	\$ 271.62
18	687,100	688,230	1,130	-7,870	0.0020	\$ 66.00	\$ 66.00	18	3,993,630	4,107,350	123,720	0.0020	\$ 247.44
Deleted - 19	0	0	0	-9,000	0.0020	\$ -	\$ -	19	0	0	0	0.0020	\$ -
Deleted - 20	0	0	0	-9,000	0.0020	\$ -	\$ -	20	0	0	0	0.0020	\$ -
21	830,960	832,990	2,030	-6,970	0.0020	\$ 66.00	\$ 66.00	21	4,157,140	4,281,700	124,560	0.0020	\$ 249.12
22	488,540	490,340	3,800	-5,200	0.0020	\$ (10.40)	\$ 66.00	22	2,198,070	2,600,950	401,880	0.0020	\$ 803.76
23	0	0	0	-9,000	0.0020	\$ -	\$ -	23	0	0	0	0.0020	\$ -
24	899,810	919,490	19,680	10,680	0.0020	\$ 21.36	\$ 66.00	24	4,212,870	4,368,560	158,690	0.0020	\$ 307.32
25	2,228,390	2,291,600	63,110	54,110	0.0020	\$ 108.22	\$ 66.00	25	1,521,940	1,596,010	74,070	0.0020	\$ 148.14
26	0	0	0	-9,000	0.0020	\$ -	\$ -	26	0	0	0	0.0020	\$ -
27	0	0	0	-9,000	0.0020	\$ -	\$ -	27	0	0	0	0.0020	\$ -
28	3,258,790	3,275,180	16,390	9,390	0.0020	\$ 18.78	\$ 66.00	28	287,240	301,030	13,790	0.0020	\$ 27.68
New Owner 29	660,540	697,510	36,970	27,970	0.0020	\$ 55.94	\$ 66.00	29	1,480,440	1,509,600	99,160	0.0020	\$ 198.32
30	0	0	0	-9,000	0.0020	\$ -	\$ -	30	0	0	0	0.0020	\$ -
31	0	0	0	-9,000	0.0020	\$ -	\$ -	31	0	0	0	0.0020	\$ -
32	0	0	0	-9,000	0.0020	\$ -	\$ -	32	0	0	0	0.0020	\$ -
33	403,320	411,880	8,560	-440	0.0020	\$ 66.00	\$ 66.00	33	2,263,740	2,362,120	118,380	0.0020	\$ 236.76
34	1,337,320	1,364,880	32,360	23,360	0.0020	\$ 46.72	\$ 66.00	34	2,040,740	2,489,400	448,660	0.0020	\$ 897.32
35	357,300	397,870	10,570	1,570	0.0020	\$ 3.14	\$ 66.00	35	2,072,910	2,154,890	81,980	0.0020	\$ 163.96
36	518,890	526,270	7,380	-1,610	0.0020	\$ 66.00	\$ 66.00	36	5,742,640	6,021,350	278,710	0.0020	\$ 557.42
37	134,330	146,020	11,690	2,690	0.0020	\$ 66.00	\$ 66.00	37	5,002,070	5,215,500	163,430	0.0020	\$ 326.86
38	0	0	0	-9,000	0.0020	\$ 66.00	\$ 66.00	38	0	0	0	0.0020	\$ -
39	618,920	536,080	17,170	8,170	0.0020	\$ 18.34	\$ 66.00	39	2,713,680	2,831,760	117,860	0.0020	\$ 235.78
40	0	0	0	-9,000	0.0020	\$ -	\$ -	40	0	0	0	0.0020	\$ -
41	104,100	132,190	28,090	19,090	0.0020	\$ 38.18	\$ 66.00	41	cubic feet 5655.26	5717.33	1,212	0.0020	\$ 2.42
42	1,390,280	1,605,280	215,000	206,000	0.0020	\$ 412.00	\$ 66.00	42	0	0	0	0.0020	\$ -
43	0	0	0	-9,000	0.0020	\$ -	\$ -	43	0	0	0	0.0020	\$ -
44	201,000	221,830	20,830	11,830	0.0020	\$ 66.00	\$ 66.00	44	848,790	860,200	31,410	0.0020	\$ 62.82
45	21,250	23,060	1,810	-7,190	0.0020	\$ -	\$ -	45	0	0	0	0.0020	\$ -
46	453,110	484,640	11,530	2,990	0.0020	\$ 66.00	\$ 66.00	46	1,701,000	1,893,550	182,550	0.0020	\$ 365.10
47	1,134,490	1,138,610	4,120	-4,890	0.0020	\$ 66.00	\$ 66.00	47	5,330,550	5,521,770	191,220	0.0020	\$ 382.44
48	1,511,620	1,601,540	89,920	80,920	0.0020	\$ 161.84	\$ 66.00	48	5,333,630	5,462,040	148,410	0.0020	\$ 296.82
49	0	0	0	-9,000	0.0020	\$ -	\$ -	49	0	0	0	0.0020	\$ -
50	0	0	0	-9,000	0.0020	\$ -	\$ -	50	0	0	0	0.0020	\$ -
51	1,278,940	129,070	-1,149,870	-1,158,870	0.0020	\$ 66.00	\$ 66.00	51	2,933,540	3,040,200	106,760	0.0020	\$ 213.52
52	117,250	122,410	5,160	-3,940	0.0020	\$ (7.68)	\$ 66.00	52	2,241,400	2,312,430	71,030	0.0020	\$ 142.06
53	715,881	717,828	1,947	-7,053	0.0020	\$ 66.00	\$ 66.00	53	4,495,920	5,022,040	526,120	0.0020	\$ 1,052.24
54	4,444,780	4,449,770	4,990	-4,910	0.0020	\$ 66.00	\$ 66.00	54	3,318,970	3,531,520	212,550	0.0020	\$ 425.10
55	0	0	0	-9,000	0.0020	\$ -	\$ -	55	0	0	0	0.0020	\$ -
56	171,010	179,500	8,490	-510	0.0020	\$ (1.02)	\$ 66.00	56	4,810,410	4,925,650	115,240	0.0020	\$ 230.48
57	0	0	0	-9,000	0.0020	\$ -	\$ -	57	0	0	0	0.0020	\$ -
58	539,330	553,600	14,210	5,210	0.0020	\$ 10.42	\$ 66.00	58	5,163,320	5,276,320	113,000	0.0020	\$ 226.00
59	16,290	24,850	8,560	-440	0.0020	\$ 66.00	\$ 66.00	59	101,780	109,470	7,690	0.0020	\$ 15.38
60	608,670	621,090	12,420	3,420	0.0020	\$ 6.84	\$ 66.00	60	626,130	630,870	4,740	0.0020	\$ 9.48
61	37,800	48,570	10,770	1,770	0.0020	\$ 3.54	\$ 66.00	61	0	150,650	150,350	0.0020	\$ 316.70
62	400,600	412,920	12,320	3,320	0.0020	\$ 6.64	\$ 66.00	62	2,394,920	2,485,940	91,020	0.0020	\$ 182.04
63	45,100	49,880	1,880	-7,120	0.0020	\$ 66.00	\$ 66.00	63	749,440	813,260	63,820	0.0020	\$ 127.64
64	35,690	37,400	1,510	-7,490	0.0020	\$ 66.00	\$ 66.00	64	2,326,580	2,434,160	107,600	0.0020	\$ 216.20
65	0	0	0	-9,000	0.0020	\$ -	\$ -	65	0	0	0	0.0020	\$ -
66	647,570	656,100	7,530	-1,470	0.0020	\$ 66.00	\$ 66.00	66	2,196,560	2,294,630	188,060	0.0020	\$ 376.12
67	0	0	0	-9,000	0.0020	\$ -	\$ -	67	0	0	0	0.0020	\$ -
68	113,120	122,450	9,330	330	0.0020	\$ 66.00	\$ 66.00	68	384,000	389,440	5,440	0.0020	\$ 10.88
69	22,040	236,820	214,880	205,880	0.0020	\$ 411.76	\$ 66.00	69	522,400	616,810	94,410	0.0020	\$ 189.82
70	72,520	79,610	7,090	-1,910	0.0020	\$ 66.00	\$ 66.00	70	1,748,900	1,848,750	99,850	0.0020	\$ 199.70
71	92,640	101,020	8,380	-920	0.0020	\$ 66.00	\$ 66.00	71	827,510	916,690	89,170	0.0020	\$ 178.34
72	1,039,000	1,052,920	13,920	4,920	0.0020	\$ 9.84	\$ 66.00	72	4,852,230	5,018,990	156,760	0.0020	\$ 313.52
73	1,453,950	1,459,030	5,080	-3,920	0.0020	\$ 66.00	\$ 66.00	73	1,161,770	1,214,820	53,050	0.0020	\$ 106.10
74	0	0	0	-9,000	0.0020	\$ -	\$ -	74	0	0	0	0.0020	\$ -
75	1,375,640	1,390,540	14,900	5,900	0.0020	\$ 66.00	\$ 66.00	75	7,418,820	7,687,920	269,100	0.0020	\$ 538.20
76	2,412,890	2,424,270	11,380	2,380	0.0020	\$ 66.00	\$ 66.00	76	5,658,160	5,806,420	148,260	0.0020	\$ 296.52
77	0	0	0	-9,000	0.0020	\$ 66.00	\$ 66.00	77	0	0	0	0.0020	\$ -
78	403,920	416,830	13,010	4,010	0.0020	\$ 66.00	\$ 66.00	78	2,544,570	2,671,760	127,190	0.0020	\$ 254.38
79	558,120	689,870	11,750	2,750	0.0020	\$ 5.50	\$ 66.00	79	1,545,450	1,624,900	79,450	0.0020	\$ 158.90

Lot #	Domestic Reading		Domestic Usage	Net Loss		Rate	3 months Base Rate		Total Billed	Inflation		Inflation Usage	Rate	BILL 2016 SEWER FEES
	4/1/2017	7/1/2017		RC-GAL	RC-GAL		4/1/2017	7/1/2017		Inflation	Usage			
80	0	0	0	-9,000	0.0020	\$	\$	\$	0	0.0020	\$	-		
81	0	0	0	-9,000	0.0020	\$	\$	\$	0	0.0020	\$	-		
82	34,660	367,690	10,930	1,500	0.0020	\$	\$ 66.00	\$ 66.00	1,644,630	1,644,710	0	0.0020	\$ 0.36	
83	39,730	49,480	9,670	570	0.0020	\$	\$ 66.00	\$ 66.00	24,659	384,180	369,551	0.0020	\$ 739.10	
84	609,920	640,160	30,240	21,240	0.0020	\$	\$ 66.00	\$ 109.46	4,449,940	4,574,390	124,440	0.0020	\$ 246.86	
code # 85	116,860	129,380	12,500	3,500	0.0020	\$	\$ 7.00	\$ 66.00	6,997,530	7,149,410	251,680	0.0020	\$ 502.16	
86	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
87	664,560	996,070	27,520	18,620	0.0020	\$	\$ 37.04	\$ 66.00	1,025,860	1,018,300	12,450	0.0020	\$ 24.64	
88	674,640	673,580	1,060	7,810	0.0020	\$	\$ 66.00	\$ 66.00	4,694,280	4,702,140	194,860	0.0020	\$ 369.72	
89	509,590	614,780	5,200	-2,910	0.0020	\$	\$ 66.00	\$ 66.00	7,469,260	7,734,000	244,640	0.0020	\$ 469.28	
90	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
91	45,620	48,390	2,760	-8,240	0.0020	\$	\$ 66.00	\$ 66.00	2,693,260	2,691,760	72,420	0.0020	\$ 144.64	
92	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
93	166,640	179,810	17,270	8,270	0.0020	\$	\$ 16.64	\$ 66.00	2,667,710	2,763,660	115,660	0.0020	\$ 221.76	
94	526,720	541,720	15,000	9,000	0.0020	\$	\$ 66.00	\$ 66.00	6,622,660	5,872,580	263,460	0.0020	\$ 506.58	
95	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
96	1,427,390	1,480,070	52,680	43,680	0.0020	\$	\$ 87.36	\$ 66.00	4,372,410	4,435,920	63,510	0.0020	\$ 127.16	
97	393,620	398,510	4,690	-4,310	0.0020	\$	\$ 66.00	\$ 66.00	3,969,620	3,726,020	166,560	0.0020	\$ 322.76	
98	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
99	59,810	64,100	7,160	-1,810	0.0020	\$	\$ 66.00	\$ 66.00	2,145,920	2,145,920	214,520	0.0020	\$ 429.04	
100	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
101	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
102	469,680	611,000	48,320	39,320	0.0020	\$	\$ 76.64	\$ 66.00	6,192,330	6,363,730	191,400	0.0020	\$ 362.80	
103	154,150	163,950	9,800	800	0.0020	\$	\$ 66.00	\$ 66.00	1,931,132	1,706,430	1,667,260	0.0020	\$ 3,134.59	
104	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
105	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
106	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
107	187,530	191,260	3,730	-5,270	0.0020	\$	\$ 66.00	\$ 66.00	6,509,200	6,628,540	119,340	0.0020	\$ 238.66	
108	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
109	964,740	967,850	13,210	-4,210	0.0020	\$	\$ 8.42	\$ 66.00	3,866,280	4,264,490	265,210	0.0020	\$ 530.42	
110	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
111	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
112	82,710	62,670	260	-6,740	0.0020	\$	\$ 66.00	\$ 66.00	1,110	63,190	82,690	0.0020	\$ 164.16	
113	758,100	757,340	2,200	-6,800	0.0020	\$	\$ 66.00	\$ 66.00	6,116,070	6,458,260	352,180	0.0020	\$ 704.36	
114	264,170	271,570	7,400	-1,690	0.0020	\$	\$ 66.00	\$ 66.00	4,433,710	4,673,450	239,740	0.0020	\$ 479.46	
115	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
116	0	0	0	-9,000	0.0020	\$	\$	\$	0	0	0	0.0020	\$	
117	0	0	0	-9,000	0.0020	\$	\$ 1,673.92	\$ 5,214.00	0	0	0	0.0020	\$ 26,773.08	
202,877										-770,123	-307,300			13,396,659

	4/1/2017	7/1/2017
#5 Restroom	143,140	146,010
#15 Restroom	2,074,950	2,690,020
Rec Ctr Domestic	9,693,979	1,821,970
Rec Ctr Inrg	30,452,190	32,256,600
clubhouse	6,468,500	6,675,000

	4/1/2017	7/1/2017
Domestic Water Prod	57,964,000	62,484,000
Inflation WWR	87,945,090	83,773,500

2,870
5,050
-6,473,089
1,783,700
186,100
144,240

0
-2,171,560

ESTIMATE	-625,863	-8,091,262
TOTAL BI	0	-2,171,560

PLEASE ONLY TYPE IN BLUE HIGHLIGHTED BOXES

Lot #	Domestic Reading	Domestic Reading	Domestic Usage	Nat'l Int'l SR-GAL	Rate	3 months Base Rate	Total Based	Lot #	Installation	Installation	Intercom Usage	Rate	2016 BILL SEWER FEES
76	419,930	424,370	7,440	-1,660	0.0020	\$ 66.00	\$ 66.00	76	2,671,760	2,674,720	202,960	0.0020	405.92
79	569,970	580,650	10,780	1,760	0.0020	\$ 66.00	\$ 69.96	79	1,624,900	1,724,690	99,790	0.0020	199.46
80	0	0	0	0	0.0020	\$ -	\$ -	80	0	0	0	0.0020	-
81	0	0	0	-9,000	0.0020	\$ -	\$ -	81	0	0	0	0.0020	-
82	357,990	394,950	6,960	-2,040	0.0020	\$ 66.00	\$ 66.00	82	1,644,710	1,644,730	20	0.0020	0.04
83	49,460	64,520	5,060	3,940	0.0020	\$ 66.00	\$ 66.00	83	394,180	539,840	142,660	0.0020	286.30
84	640,460	652,630	11,870	2,870	0.0020	\$ 67.4	\$ 71.74	84	4,574,380	4,687,660	112,680	0.0020	222.30
85	129,990	138,760	9,360	380	0.0020	\$ 66.00	\$ 66.76	85	7,149,410	7,412,290	263,790	0.0020	627.58
86	0	0	0	-9,000	0.0020	\$ -	\$ -	86	0	0	0	0.0020	-
87	986,070	1,029,930	32,910	23,910	0.0020	\$ 47.82	\$ 113.92	87	1,019,900	1,048,640	30,340	0.0020	60.88
88	679,980	690,220	640	-830	0.0020	\$ 66.00	\$ 66.00	88	4,773,140	5,058,890	279,740	0.0020	559.46
89	514,780	517,800	3,020	-5,980	0.0020	\$ 66.00	\$ 66.00	89	7,744,000	7,930,790	186,790	0.0020	373.56
90	0	0	0	-9,000	0.0020	\$ -	\$ -	90	0	0	0	0.0020	-
91	48,980	53,460	5,100	-3,900	0.0020	\$ 66.00	\$ 66.00	91	2,611,760	2,774,890	93,110	0.0020	166.22
92	0	0	0	-9,000	0.0020	\$ -	\$ -	92	0	0	0	0.0020	-
93	179,910	189,670	9,160	160	0.0020	\$ 66.00	\$ 66.32	93	2,789,690	2,873,670	90,220	0.0020	180.44
94	541,720	549,640	7,820	-1,080	0.0020	\$ 66.00	\$ 66.00	94	5,875,580	6,185,390	309,810	0.0020	619.62
95	0	0	0	-9,000	0.0020	\$ -	\$ -	95	0	0	0	0.0020	-
96	1,480,070	1,567,670	67,600	78,600	0.0020	\$ 167.20	\$ 223.20	96	4,435,990	4,521,580	65,570	0.0020	171.14
97	398,510	398,620	110	-8,990	0.0020	\$ 66.00	\$ 66.00	97	3,796,020	3,946,820	210,600	0.0020	421.60
98	0	0	0	-9,000	0.0020	\$ -	\$ -	98	0	0	0	0.0020	-
99	59,190	63,190	5,060	-3,610	0.0020	\$ 66.00	\$ 66.00	99	2,167,20	2,964,370	149,650	0.0020	299.70
100	0	0	0	-9,000	0.0020	\$ -	\$ -	100	0	0	0	0.0020	-
101	0	0	0	-9,000	0.0020	\$ -	\$ -	101	0	0	0	0.0020	-
102	511,800	536,190	25,190	16,160	0.0020	\$ 32.28	\$ 66.00	102	6,383,730	6,641,310	257,980	0.0020	515.16
103	163,990	170,190	5,240	-2,760	0.0020	\$ 66.00	\$ 66.00	103	1,796,490	1,992,870	276,240	0.0020	652.46
104	0	0	0	-9,000	0.0020	\$ -	\$ -	104	0	0	0	0.0020	-
105	0	0	0	-9,000	0.0020	\$ -	\$ -	105	0	0	0	0.0020	-
106	0	0	0	-9,000	0.0020	\$ -	\$ -	106	0	0	0	0.0020	-
107	191,260	195,680	4,420	-4,580	0.0020	\$ 66.00	\$ 66.00	107	6,626,540	6,690,180	51,650	0.0020	193.30
108	0	0	0	-9,000	0.0020	\$ -	\$ -	108	0	0	0	0.0020	-
109	557,950	568,940	16,030	7,030	0.0020	\$ 14.06	\$ 66.00	109	4,280,490	4,483,020	232,510	0.0020	469.02
110	0	0	0	-9,000	0.0020	\$ -	\$ -	110	0	0	0	0.0020	-
111	0	0	0	-9,000	0.0020	\$ -	\$ -	111	0	0	0	0.0020	-
112	62,970	63,090	120	-9,860	0.0020	\$ 66.00	\$ 66.00	112	93,190	209,690	116,460	0.0020	232.92
113	757,290	789,570	2,270	-6,730	0.0020	\$ 66.00	\$ 66.00	113	6,468,260	6,866,300	418,040	0.0020	636.06
114	271,570	276,990	7,420	-1,990	0.0020	\$ 66.00	\$ 66.00	114	4,673,460	4,875,410	201,980	0.0020	403.82
115	0	0	0	-9,000	0.0020	\$ -	\$ -	115	0	0	0	0.0020	-
116	0	0	0	-9,000	0.0020	\$ -	\$ -	116	0	0	0	0.0020	-
117	0	0	0	-9,000	0.0020	\$ 327.28	\$ 5,214.40	117	0	0	0	0.0020	25,180.46
				963,189	-89,611							172,890,231	

7/19/2017	10/1/2017	2,280	144,440
#5 Redroom	146,610	148,290	
#15 Redroom	2,080,630	2,089,990	3,580
Rec Ctr Domestic	1,521,900	1,569,300	46,400
Rec Ctr Int'l	32,235,800	33,491,800	1,256,000
clubhouse	6,675,000	6,845,700	173,700

Domestic Meter	52,964,000	52,964,000	0
Int'l Meter	85,773,500	165,489,472	79,719,972

ESTIMATE	10,640,080	1,199,129
TOTAL BK	218,467,472	79,719,972

PLEASE ONLY TYPE IN BLUE HIGHLIGHTED BOXES

Lot #	Domestic Reading		Domestic Usage	Net Less 9K GAL	Rate	Amt Billed	3 months		Lot #	Irrigation		Irrigation Usage
	10/1/2017	1/1/2018					Base Rate	Total Bill		10/1/2017	1/1/2018	
1	1280,760	1,283,090	2,330	-6,670	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	1	7,756,370	7,756,370	0
2	195,300	196,360	1,060	-7,940	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	2	3,748,020	3,748,020	0
3	297,960	299,580	1,620	-7,380	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	3	6,592,360	6,592,360	0
4	177,910	179,860	1,950	-7,050	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	4	2,778,640	2,778,640	0
5	3,529,040	3,543,500	14,460	5,460	0.0020	\$ 10.92	\$ 68.00	\$ 76.92	5	6,705,410	6,705,410	0
6	0	0	0	0	0.0020	\$	\$	\$ -	6	0	0	0
7	1,143,820	1,149,020	5,200	-3,800	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	7	4,049,710	4,049,710	0
8	327,120	328,510	1,390	-7,610	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	8	4,750,600	4,750,600	0
9	2,342,560	2,344,830	2,270	-6,730	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	9	7,267,180	7,267,180	0
10	604,040	606,290	2,250	-6,750	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	10	5,593,840	5,593,840	0
11	641,450	649,430	7,960	-1,020	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	11	3,979,230	3,979,230	0
12	185,980	188,440	2,460	-6,540	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	12	9,350,420	9,350,420	0
13	1,477,050	1,513,080	36,030	27,030	0.0020	\$ 54.06	\$ 68.00	\$ 120.06	13	2,436,170	2,436,170	0
14	2,680,530	2,892,890	12,360	3,360	0.0020	\$ 6.72	\$ 69.00	\$ 72.72	14	1,755,880	1,755,880	0
15	527,210	537,750	10,540	1,540	0.0020	\$ 3.08	\$ 66.00	\$ 69.08	15	3,669,000	3,669,000	0
16	0	0	0	0	0.0020	\$	\$	\$ -	16	0	0	0
17	924,630	941,110	16,480	7,480	0.0020	\$ 14.96	\$ 66.00	\$ 80.96	17	4,071,630	4,071,630	0
18	888,930	888,950	20	-8,980	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	18	4,313,840	4,313,840	0
Deleted - 19	0	0	0	0	0.0020	\$	\$	\$ -	19	0	0	0
Deleted - 20	0	0	0	0	0.0020	\$	\$	\$ -	20	0	0	0
21	933,120	933,180	60	-8,940	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	21	4,502,190	4,502,190	0
22	501,870	503,430	1,560	-7,440	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	22	2,695,750	2,695,750	0
23	0	0	0	0	0.0020	\$	\$	\$ -	23	0	0	0
24	936,750	951,540	14,790	5,790	0.0020	\$ 11.58	\$ 66.00	\$ 77.58	24	4,513,670	4,513,670	0
25	2,323,260	2,353,930	30,670	21,670	0.0020	\$ 43.34	\$ 66.00	\$ 109.34	25	1,662,520	1,662,520	0
26	0	0	0	0	0.0020	\$	\$	\$ -	26	0	0	0
27	0	0	0	0	0.0020	\$	\$	\$ -	27	0	0	0
28	3,285,960	3,301,540	15,580	6,580	0.0020	\$ 13.16	\$ 66.00	\$ 79.16	28	314,350	314,350	0
New Owner	716,130	733,980	17,850	8,850	0.0020	\$ 17.70	\$ 66.00	\$ 83.70	29	1,716,550	1,716,550	0
30	0	0	0	0	0.0020	\$	\$	\$ -	30	0	0	0
31	0	0	0	0	0.0020	\$	\$	\$ -	31	0	0	0
32	0	0	0	0	0.0020	\$	\$	\$ -	32	0	0	0
33	417,530	426,130	8,600	-400	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	33	2,494,910	2,494,910	0
34	1,377,970	1,390,010	12,040	3,040	0.0020	\$ 6.08	\$ 66.00	\$ 72.08	34	3,029,400	3,029,400	0
35	378,670	382,320	3,650	-5,350	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	35	2,293,610	2,293,610	0
36	529,640	534,350	4,710	-4,290	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	36	6,333,980	6,333,980	0
37	154,650	162,850	8,200	-800	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	37	5,356,390	5,356,390	0
38	0	0	0	0	0.0020	\$	\$	\$ -	38	0	0	0
39	549,200	563,290	14,090	5,090	0.0020	\$ 10.18	\$ 66.00	\$ 76.18	39	2,968,120	2,968,120	0
40	0	0	0	0	0.0020	\$	\$	\$ -	40	0	0	0
41	141,370	154,870	13,500	4,500	0.0020	\$ 9.00	\$ 66.00	\$ 75.00	cubic feet 41	5817.69	5817.69	0
42	1,747,530	1,767,410	19,880	10,880	0.0020	\$ 21.76	\$ 66.00	\$ 87.76	42	0	0	0
43	0	0	0	0	0.0020	\$	\$	\$ -	43	0	0	0
44	226,940	234,310	7,370	-1,630	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	44	903,580	903,580	0
45	31,610	31,620	10	-8,990	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	45	0	0	0
46	472,710	480,370	7,660	-1,340	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	46	2,031,800	2,031,800	0
47	1,140,720	1,142,860	2,140	-6,860	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	47	5,702,060	5,702,060	0
48	1,685,200	1,698,160	12,960	3,960	0.0020	\$ 7.92	\$ 66.00	\$ 73.92	48	5,574,830	5,574,830	0
49	0	0	0	0	0.0020	\$	\$	\$ -	49	0	0	0
50	0	0	0	0	0.0020	\$	\$	\$ -	50	0	0	0
51	130,215	131,096	881	-8,119	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	51	3,248,900	3,248,900	0
52	133,930	138,450	4,520	-4,480	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	52	2,414,100	2,414,100	0
53	720,462	721,082	620	-8,380	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	53	5,436,840	5,436,840	0
54	4,455,940	4,458,780	2,840	-8,160	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	54	3,826,170	3,826,170	0
55	0	0	0	0	0.0020	\$	\$	\$ -	55	0	0	0
56	189,940	191,980	2,040	-6,960	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	56	5,110,710	5,110,710	0
57	0	0	0	0	0.0020	\$	\$	\$ -	57	0	0	0
58	563,410	571,810	8,400	-600	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	58	5,420,010	5,420,010	0
59	31,290	33,560	2,270	-6,730	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	59	115,650	115,650	0
60	633,130	641,380	8,250	-750	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	60	633,800	633,800	0
61	63,740	69,580	5,840	-3,160	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	61	255,140	255,140	0
62	433,440	444,370	10,930	1,930	0.0020	\$ 3.86	\$ 66.00	\$ 69.86	62	2,602,540	2,602,540	0
63	49,450	50,760	1,310	-7,690	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	63	882,270	882,270	0
64	40,390	42,950	2,560	-6,440	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	64	2,515,050	2,515,050	0
65	0	0	0	0	0.0020	\$	\$	\$ -	65	0	0	0
66	660,650	667,480	6,830	-2,170	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	66	2,358,170	2,358,170	0
67	0	0	0	0	0.0020	\$	\$	\$ -	67	0	0	0
68	128,150	132,700	4,550	-4,450	0.0020	\$ 66.00	\$ 66.00	\$ 66.00	68	397,570	397,570	0

Lot #	Domestic Reading		Domestic Usage	Net Less 9K GAL.	Rate	Amt Billed	3 months		Lot #	Irrigation		Irrigation Usage
	10/1/2017	1/1/2018					Base Rate	Total Bill		10/1/2017	1/1/2018	
69	263,500	271,830	8,430	-570	0.0020	\$ 66.00	\$ 66.00	69	725,820	725,820	0	
70	8,373	8,850	477	-8,523	0.0020	\$ 66.00	\$ 66.00	70	1,952,670	1,952,670	0	
71	105,390	109,730	4,340	-4,660	0.0020	\$ 66.00	\$ 66.00	71	1,089,530	1,089,530	0	
72	1,068,930	1,077,610	8,680	-320	0.0020	\$ 66.00	\$ 66.00	72	5,204,750	5,204,750	0	
73	1,463,100	1,468,180	5,080	-3,920	0.0020	\$ 66.00	\$ 66.00	73	1,274,590	1,274,590	0	
74	0	0	0	0	0.0020	\$ -	\$ -	74	0	0	0	
75	1,398,290	1,411,060	12,770	3,770	0.0020	\$ 7.54	\$ 66.00	\$ 73.54	75	7,933,970	7,933,970	0
76	2,432,650	2,440,880	8,230	-770	0.0020	\$ 66.00	\$ 66.00	76	5,963,630	5,963,630	0	
77	0	0	0	0	0.0020	\$ -	\$ -	77	0	0	0	
78	424,390	430,310	5,920	-3,080	0.0020	\$ 66.00	\$ 66.00	78	2,874,720	2,874,720	0	
79	580,650	589,950	9,300	300	0.0020	\$ 0.60	\$ 66.00	\$ 66.60	79	1,724,680	1,724,680	0
80	0	0	0	0	0.0020	\$ -	\$ -	80	0	0	0	
81	0	0	0	0	0.0020	\$ -	\$ -	81	0	0	0	
82	364,850	371,340	6,390	-2,610	0.0020	\$ 66.00	\$ 66.00	82	1,644,730	1,644,730	0	
83	54,520	63,090	8,570	-430	0.0020	\$ 66.00	\$ 66.00	83	536,840	536,840	0	
84	652,030	669,360	17,330	8,330	0.0020	\$ 16.66	\$ 66.00	\$ 82.66	84	4,687,060	4,687,060	0
cubic ft 85	138,760	149,500	10,740	1,740	0.0020	\$ 3.48	\$ 66.00	\$ 69.48	85	7,412,200	7,412,200	0
86	0	0	0	0	0.0020	\$ -	\$ -	86	0	0	0	
87	1,028,980	1,035,520	6,540	-2,460	0.0020	\$ 66.00	\$ 66.00	87	1,048,640	1,048,640	0	
88	680,220	681,360	1,140	-7,860	0.0020	\$ 66.00	\$ 66.00	88	5,058,880	5,058,880	0	
89	517,800	518,200	400	-8,600	0.0020	\$ 66.00	\$ 66.00	89	7,930,790	7,930,790	0	
90	0	0	0	0	0.0020	\$ -	\$ -	90	0	0	0	
91	53,460	54,370	890	-8,110	0.0020	\$ 66.00	\$ 66.00	91	2,774,890	2,774,890	0	
92	0	0	0	0	0.0020	\$ -	\$ -	92	0	0	0	
93	189,070	197,490	8,420	-580	0.0020	\$ 66.00	\$ 66.00	93	2,873,870	2,873,870	0	
94	549,640	557,340	7,700	-1,300	0.0020	\$ 66.00	\$ 66.00	94	6,185,390	6,185,390	0	
95	0	0	0	-8,000	0.0020	\$ -	\$ -	95	0	0	0	
96	1,567,670	1,593,900	26,230	17,230	0.0020	\$ 34.46	\$ 66.00	\$ 100.46	96	4,521,560	4,521,560	0
97	398,620	401,830	3,210	-5,790	0.0020	\$ 66.00	\$ 66.00	97	3,946,820	3,946,820	0	
98	0	0	0	0	0.0020	\$ 66.00	\$ 66.00	98	0	0	0	
New Owner 99	63,160	68,920	5,760	-3,240	0.0020	\$ 66.00	\$ 66.00	99	364,370	364,370	0	
100	0	0	0	0	0.0020	\$ -	\$ -	100	0	0	0	
101	0	0	0	0	0.0020	\$ -	\$ -	101	0	0	0	
102	536,190	559,570	23,380	14,380	0.0020	\$ 28.76	\$ 66.00	\$ 94.76	102	6,641,310	6,641,310	0
103	170,190	175,960	5,770	-3,230	0.0020	\$ 66.00	\$ 66.00	103	1,982,670	1,982,670	0	
104	0	0	0	0	0.0020	\$ -	\$ -	104	0	0	0	
105	0	0	0	0	0.0020	\$ -	\$ -	105	0	0	0	
106	0	0	0	0	0.0020	\$ -	\$ -	106	0	0	0	
107	195,680	197,340	1,660	-7,340	0.0020	\$ 66.00	\$ 66.00	107	6,680,190	6,680,190	0	
108	0	0	0	0	0.0020	\$ -	\$ -	108	0	0	0	
109	583,980	593,710	9,730	730	0.0020	\$ 1.46	\$ 66.00	\$ 67.46	109	4,483,000	4,483,000	0
110	0	0	0	0	0.0020	\$ -	\$ -	110	0	0	0	
111	0	0	0	0	0.0020	\$ -	\$ -	111	0	0	0	
112	63,090	64,190	1,100	-7,900	0.0020	\$ 66.00	\$ 66.00	112	209,650	209,650	0	
113	759,570	762,240	2,670	-6,330	0.0020	\$ 66.00	\$ 66.00	113	6,886,300	6,886,300	0	
114	278,990	288,380	7,390	-1,610	0.0020	\$ 66.00	\$ 66.00	114	4,875,410	4,875,410	0	
115	0	0	0	0	0.0020	\$ -	\$ -	115	0	0	0	
116	0	0	0	0	0.0020	\$ -	\$ -	116	0	0	0	
117	0	0	0	0	0.0020	\$ -	\$ -	117	0	0	0	
					\$ 327.28	\$ 4,290.00	\$ 5,541.28					
					593.808	-117,192		65,691				

	10/1/2017	1/1/2018		
#5 Restroom	148,290	149,090	800	
#15 Restroom	2,083,590	2,085,250	1,660	
Rec Ctr Domestic	1,568,300	1,569,600	1,300	144,240
Rec Ctr Irrig	33,491,800	33,491,800	0	
clubhouse	6,848,700	6,886,100	37,400	

PLEASE ONLY TYPE IN BLUE HIGHLIGHTED BOXES

Domestic Well fees	5,298,400	5,286,400	0	
Irrigation Well	165,493,472	82,141,800	83,351,672	

ESTIMATED C	10,690,040	0
TOTAL BOTH	135,105,800	0

Lat #	Domestic Resection	Domestic Resection	Domestic Usage	Net/Late RR-GAL	Rate	Amount	3 months Bmo Rate	Total Billed	Lat #	Invasion	Invasion	Invasion Usage	Rate	Amount	BILL SEWER FEES
80	31/12/018	4/1/2/018	0	0	0.0020		\$	68.00	80	11/20/018	4/1/2/018	0	0.0020	0.00	0.00
81	0	0	0	0	0.0020		\$	68.00	81	0	0	0	0.0020	0.00	0.00
82	371,340	373,500	21,890	-4,840	0.0020		\$	68.00	82	1,644,730	1,644,730	0	0.0020	0.00	0.00
83	63,090	67,890	4,800	-4,200	0.0020		\$	68.00	83	536,640	536,640	21,340	0.0020	42.76	New
84	699,390	673,630	4,470	-1,530	0.0020		\$	68.00	84	4,687,680	4,688,620	1,790	0.0020	3.52	
cube R 85	148,600	158,410	6,970	-2,090	0.0020		\$	68.00	85	7,412,000	7,438,000	23,900	0.0020	47.60	
86	0	0	0	0	0.0020		\$	68.00	86	0	0	0	0.0020	0.00	0.00
87	1,035,500	1,043,650	4,140	-80	0.0020		\$	68.00	87	1,048,640	1,048,640	0	0.0020	0.00	0.00
88	601,390	697,780	6,400	-2,000	0.0020		\$	68.00	88	5,098,960	5,065,910	6,090	0.0020	18.88	
89	0	0	0	0	0.0020		\$	68.00	89	7,800,790	7,850,380	19,990	0.0020	38.18	
90	0	0	0	0	0.0020		\$	68.00	90	0	0	0	0.0020	0.00	0.00
91	54,370	54,559	180	-4,020	0.0020		\$	68.00	91	2,774,890	2,788,010	11,720	0.0020	22.24	
92	0	0	0	0	0.0020		\$	68.00	92	0	0	0	0.0020	0.00	0.00
93	197,430	202,690	5,190	-3,810	0.0020		\$	68.00	93	2,873,970	2,904,290	30,710	0.0020	81.42	
94	587,340	555,010	7,670	-1,330	0.0020		\$	68.00	94	6,188,390	6,256,720	70,860	0.0020	141.76	
95	0	0	0	0	0.0020		\$	68.00	95	0	0	0	0.0020	0.00	0.00
96	0	0	0	0	0.0020		\$	68.00	96	4,581,580	4,535,310	13,750	0.0020	27.50	
97	401,830	403,510	1,890	-7,320	0.0020		\$	68.00	97	3,948,820	4,006,750	59,990	0.0020	119.86	
New Owner	0	75,000	0	-2,000	0.0020		\$	68.00	98	0	0	0	0.0020	0.00	0.00
99	68,830	0	6,090	0	0.0020		\$	68.00	99	384,370	382,940	18,470	0.0020	38.94	
100	0	0	0	0	0.0020		\$	68.00	100	0	0	0	0.0020	0.00	0.00
101	0	0	0	0	0.0020		\$	68.00	101	0	0	0	0.0020	0.00	0.00
102	599,570	575,590	16,020	7,020	0.0020	14.04	\$	68.00	102	8,844,310	8,662,270	20,960	0.0020	41.92	New
103	178,980	181,050	7,090	-1,810	0.0020		\$	68.00	103	1,987,670	1,025,170	-957,500	0.0020	0.00	
104	0	0	0	0	0.0020		\$	68.00	104	0	0	0	0.0020	0.00	0.00
105	0	0	0	0	0.0020		\$	68.00	105	0	0	0	0.0020	0.00	0.00
106	0	0	0	0	0.0020		\$	68.00	106	0	0	0	0.0020	0.00	0.00
107	187,340	201,220	3,980	-5,120	0.0020		\$	68.00	107	6,690,190	6,692,130	6,940	0.0020	13.88	
108	0	0	0	0	0.0020		\$	68.00	108	0	0	0	0.0020	0.00	0.00
109	599,710	603,170	9,490	460	0.0020	0.92	\$	68.00	109	4,483,000	4,489,920	5,920	0.0020	11.64	
110	0	0	0	0	0.0020		\$	68.00	110	0	0	0	0.0020	0.00	0.00
111	0	0	0	0	0.0020		\$	68.00	111	0	0	0	0.0020	0.00	0.00
112	64,190	64,480	280	-4,740	0.0020		\$	68.00	112	209,690	223,230	13,560	0.0020	27.18	
113	759,240	782,640	600	-8,400	0.0020		\$	68.00	113	6,890,300	6,819,550	32,250	0.0020	64.50	
114	288,390	294,470	8,090	-810	0.0020		\$	68.00	114	4,875,410	4,898,370	12,960	0.0020	26.82	
115	0	0	0	0	0.0020		\$	68.00	115	0	0	0	0.0020	0.00	0.00
116	0	0	0	0	0.0020		\$	68.00	116	0	0	0	0.0020	0.00	0.00
117	0	0	0	0	0.0020		\$	68.00	117	0	0	0	0.0020	0.00	0.00
509,292 -211,788															
256.50 \$ 5,214.00															
737,395															

PLEASE ONLY TYPE IN BLUE HIGHLIGHTED BOXES

Domestic Resection	Domestic Resection	Domestic Usage	Net/Late RR-GAL	Rate	Amount	3 months Bmo Rate	Total Billed	Lat #	Invasion	Invasion	Invasion Usage	Rate	Amount
4/5 Resection	11/1/2018	4/1/2/018						80	11/20/018	4/1/2/018	0	0.0020	0.00
#15 Resection	149,090	149,470	380					81	0	0	0	0.0020	0.00
Rec Ct-Ing	2,085,250	2,039,620	4,370					82	1,644,730	1,644,730	0	0.0020	0.00
colchasse	1,669,600	1,569,800	200	144,240				83	536,640	536,640	21,340	0.0020	42.76
	33,481,800	33,481,800	0					84	4,687,680	4,688,620	1,790	0.0020	3.52
	6,998,100	9,937,480	2,811,380					85	7,412,000	7,438,000	23,900	0.0020	47.60
	52,984,000	52,984,000	0					86	0	0	0	0.0020	0.00
Irregular Well	82,141,800	90,396,900	1,254,700					87	1,048,640	1,048,640	0	0.0020	0.00
								88	5,098,960	5,065,910	6,090	0.0020	18.88
								89	7,800,790	7,850,380	19,990	0.0020	38.18
								90	0	0	0	0.0020	0.00
								91	2,774,890	2,788,010	11,720	0.0020	22.24
								92	0	0	0	0.0020	0.00
								93	2,873,970	2,904,290	30,710	0.0020	81.42
								94	6,188,390	6,256,720	70,860	0.0020	141.76
								95	0	0	0	0.0020	0.00
								96	4,581,580	4,535,310	13,750	0.0020	27.50
								97	3,948,820	4,006,750	59,990	0.0020	119.86
								98	0	0	0	0.0020	0.00
								99	384,370	382,940	18,470	0.0020	38.94
								100	0	0	0	0.0020	0.00
								101	0	0	0	0.0020	0.00
								102	8,844,310	8,662,270	20,960	0.0020	41.92
								103	1,987,670	1,025,170	-957,500	0.0020	0.00
								104	0	0	0	0.0020	0.00
								105	0	0	0	0.0020	0.00
								106	0	0	0	0.0020	0.00
								107	6,690,190	6,692,130	6,940	0.0020	13.88
								108	0	0	0	0.0020	0.00
								109	4,483,000	4,489,920	5,920	0.0020	11.64
								110	0	0	0	0.0020	0.00
								111	0	0	0	0.0020	0.00
								112	209,690	223,230	13,560	0.0020	27.18
								113	6,890,300	6,819,550	32,250	0.0020	64.50
								114	4,875,410	4,898,370	12,960	0.0020	26.82
								115	0	0	0	0.0020	0.00
								116	0	0	0	0.0020	0.00
								117	0	0	0	0.0020	0.00
								ESTIMATED C			13,606,370	3,324,652	
								TOTAL BOTH			146,380,500	11,254,700	

CASE: WJ 34
WITNESS: JOAN GRINDELAND

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 104

**Exhibits in Support
Of Reply Testimony**

CONFIDENTIAL EXHIBIT
August 23, 2018

STAFF EXHIBIT 104

**IS CONFIDENTIAL AND SUBJECT TO PROTECTIVE
ORDER NO. 18-152. YOU MUST HAVE SIGNED
APPENDIX B OF THE PROTECTIVE ORDER IN
DOCKET WJ 34 TO RECEIVE THE
CONFIDENTIAL VERSION
OF THIS EXHIBIT.**

CASE: WJ 34
WITNESS: SCOTT SHEARER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 200

Reply Testimony

August 23, 2018

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Scott Shearer. I am a Senior Compliance Specialist
3 employed in the Consumer Services Section of the Public Utility
4 Commission of Oregon (Commission). My business address is 201 High
5 Street SE, Suite 100, Salem, Oregon 97301.

6 **Q. Please describe your educational background and work experience.**

7 A. My witness qualification statement is found in Exhibit Staff/201.

8 **Q. What is the purpose of your testimony?**

9 A. The purpose of my testimony is to provide background and details
10 related to customers' petitions to assert rate jurisdiction over water
11 utilities and how the petitions received apply in this case.

12 **Q. Did you prepare any exhibits for this docket?**

13 A. Yes. I prepared Exhibits Staff/201, my witness qualification statement;
14 Staff/202, Aspen Lakes notice of rate increase and right to petition;
15 Staff/203, customer petition list by customer type, validity; Staff/204,
16 rate schedule, customer counts; and Staff/205, petition percentage
17 calculations.

18 **Q. How is your testimony organized?**

19 A. My testimony is organized as follows:

20	Item 1, Validity of Petitions Received.....	2
21	Item 2, Customer Petitions Filed Previously	6
22	Item 3, Staff Recommendation on Petition Acceptance	8

ITEM 1, VALIDITY OF PETITIONS RECEIVED

Q. What is required for a petition to be considered valid in order to assert rate jurisdiction for water companies?

A. As discussed in Staff Witness Grindeland's testimony and as will be further discussed in briefing, Oregon Revised Statute 757.061(3) provides the requirements for when a water utility becomes rate regulated. For water utilities serving fewer than 500 customers, the Commission may assert rate regulation if the water utility proposed to charge a rate for water service that exceeds the maximum rates established by Commission rule, and if 20 percent or more of its customers file a valid petition requesting that the utility be subject to rate regulation.

Q. How does Staff determine the validity of customer petitions?

A. The Commission's practice, and explicit policy in other similar circumstances, has been that an original signature is required in order for a petition to be considered valid. The customer petition needs to have enough information to confirm that it is from a customer of the utility. I reviewed each petition received and matched each petition to a customer of record of the utility. Two petitions received did not include a signature, even though they were customers of the company.

Q. How does Staff calculate whether twenty percent of customers have petitioned?

1 A. Generally, Staff takes the number of valid petitions divided by the number of
2 customers. As discussed below, there is some dispute on what is considered a
3 customer class/service. I calculated the threshold using several scenarios.

4 **Q. Did the Commission receive valid petitions from twenty percent or more**
5 **of Aspen Lakes' customers in this case?**

6 A. Yes. The Commission received petitions from customers of 50 unique
7 addresses, representing 44 individuals, with 6 names tied to multiple
8 addresses. Two petitions were excluded, as they were unsigned. Of the
9 remaining 48 petitions, 16 were also signed by co-customers.

10 Because of the complexity of the rate schedules filed by the Company,
11 as well as some disparity in what is considered a customer/service, I have
12 calculated the petition rates in five different scenarios (see Exhibit
13 Staff/205). The calculations show petition percentages between 28 percent
14 when calculated by customer class¹ to 51 percent when calculated by all
15 rate schedules.²

16 Staff recommends that the Commission include stand-by fire protection
17 customers in the customer count, as discussed in Staff Witness Grindeland's
18 testimony. Using this methodology, 41 percent³ of customers petitioned the
19 Commission for rate regulation.

¹ 10 out of 36 customers whose only service is Stand-by Fire Protection petitioned.

² 124 out of 245 customers petitioned when breaking out each customer and petition by customer class.

³ See Exhibit Staff/205, Shearer/2.

1 However, as there is some dispute as to whether the stand-by fire
2 protection customers should be included as a rate schedule, the Commission
3 may also rely on the figures in Exhibit Staff/205, Shearer/1, which portrays the
4 types of customer classes the Company serves and excludes other customer
5 statuses that are potentially in dispute in this proceeding. This conservative
6 calculation uses only the number of valid commercial and residential petitions
7 received by the Commission in this filing (38) divided by the number of
8 Commercial and Residential customers reported by the Company (82), and
9 excludes Irrigation and Stand-by Fire Protection services. Using this
10 calculation, the customer petitions received equal to 46 percent, 26 percentage
11 points over the minimum customer petition requirement.

12 **Q. Are customer petitions only accepted during the 45 notice of**
13 **rate increase period?**

14 A. No. The Commission's Division 36 rules and Commission practice
15 typically tie the 45 day window for petitions to the utility-issued notice of
16 rate increase. Although I am not an attorney, and this issue will be
17 addressed in Staff's briefs in this matter, it is my understanding that
18 neither ORS 757.061 nor the Division 36 rules restrict rate regulation
19 petitions to any specific period of time.

20 This is also supported by policy and is consistent with prior
21 Commission precedent. For example, in Commission Dockets WJ 23,
22 WJ 25, and WJ 27, rate regulation was asserted even though rates had

1 already gone into effect.⁴ In Commission Docket WJ 19, the
2 Commission received petitions from more than 20 percent of customers
3 after rates had gone into effect, but before Commission Staff made a
4 determination on threshold and notice requirements. Because the
5 Commission had already received a sufficient number of customers'
6 petitions, the Commission determined additional notice was unneeded
7 and asserted rate regulation.⁵

⁴ *In re Whispering Pines Estates Water*, OPUC Docket No. WJ 23, Order No. 09-312, Commission investigation of different issue lead to discovery of charging above threshold; Company noticed customers and more than 20 percent petitioned; Commission asserted rate regulation. *In re Pelican Bay Heights Water System*, OPUC Docket No. WJ 25, Order No. 10-029, Staff received complaint from customer, determined that Company was charging above threshold amounts, and Pelican Bay notified customers. Commission asserted rate jurisdiction. *In re Boulder Creek Water System*, OPUC Docket No. WJ 27, Staff investigated rates and determined were already above the maximum threshold; customers notified of right to petition; Commission asserted jurisdiction.

⁵ *In re Mill Mar Estates Water, Inc.*, OPUC Docket No. WJ 19, Order No. 08-354 Staff determined the company was charging above threshold, but did not provide notice to customers. The Commission received petitions from more than 20 percent of customers; "since the Commission has already received a sufficient number of customers' petitions, requiring the Utility to provide adequate notice at this time would be superfluous."

ITEM 2, CUSTOMER PETITIONS FILED PREVIOUSLY

1
2 **Q. Please provide background on the previous Aspen Lakes customer**
3 **petitions received by the Commission.**

4 **A.** The Company raised rates on January 1, 2017. After being notified of
5 the increase, Commission Staff determined the rate being charged was
6 over the threshold and notified the Company of the need to issue a
7 notice. The Company sent notice to customers on March 9, 2017. The
8 notice specified "The petitions must be completed and signed by the
9 customer and must be received by the Commission within 45 days of
10 this notice." (see Exhibit Staff/203), with the 45-day period ending on
11 April 23, 2017. Due to the unique circumstances in this case, Staff
12 allowed additional time for petitions to be received, moving the cut off to
13 May 4, 2017. Even with the extended time, the Commission did not
14 receive sufficient petitions within the allowed timeframe. The
15 Commission received additional petitions through July 10, 2017.

16 **Q. How many petitions did the Commission receive related to the**
17 **original notice period?**

18 **A.** The Commission received 16 valid petitions between March 27, 2017,
19 and May 4, 2017 (the adjusted deadline date), which is just short of the
20 20 percent threshold. The Commission received an additional 16
21 petitions and 16 duplicate petitions from May 22, 2017, through July 10,
22 2017.

1 **Q. Why didn't Staff consider the late petitions received as meeting the**
2 **20 percent threshold at that time?**

3 A. Petitions were received from March 27, 2017, to July 10, 2017, which
4 equals 105 days. While there is no specific timeframe for when
5 petitions can be filed, OAR 860-035-1900 sets a 45-day timeframe
6 from the date of the notice of rate increase for when petitions would
7 be considered valid. While the 45 day period is specific to the notice
8 ahead of rates going into effect, it is prudent place reasonable
9 expectations and timeframes on petitions. Not doing so could cause
10 additional problems. If there were no end period for collecting
11 petitions, customers could petition over the course of several years
12 and still "trigger" rate regulation, which may or may not be the
13 continued desire of the customers who originally petitioned. In this
14 case, petitions were received over the course of 105 days, more than
15 twice the prescribed period.

16 **Q. What makes this petition filing different from the original attempt**
17 **to petition?**

18 A. In this instance, all petitions were received at the same time in one
19 filing, as opposed to 105 days petitions were received on the original
20 notice of rates increase period. For this reason, there is no concern
21 about the lag in timing.

1 **ITEM 3, STAFF RECOMMENDATION ON PETITION ACCEPTANCE**

2 **Q. How should the Commission proceed with the customer petitions**
3 **filed in this case?**

4 A. The Commission should conclude that the twenty percent threshold
5 requirement for petitions for rate regulation has been satisfied in this
6 case. As discussed more fully above, the Commission's rules do not
7 limit when customers may petition the Commission for rate regulation.
8 In this case, it is compelling that a significant percentage of Aspen
9 Lakes' customers petitioned for regulation. Notably, when the
10 Commission has been confronted with overwhelming customers support
11 for a particular action in the past, it has acted in accordance with
12 customer wishes. For example, in Commission Docket UM 1750, the
13 Commission's Consumer Service Section received a large number of
14 complaints compared to prior years, regarding NW Natural's Weather
15 Adjusted Rate Mechanism (WARM) program opt-outs.⁶ Despite the fact
16 that the NW Natural tariff had previously been approved by the
17 Commission,⁷ staff made a recommendation to the Commission to open
18 an investigation into the WARM program. The Commission adopted the
19 recommendation in Commission Order No. 15-264. The subsequent

⁶ There were 75 complaints related to the WARM program received by the Commission's Consumer Service Section in 2015, compared to 3 total between 2011 and 2014.

⁷ *In the Matter of Northwest Natural Gas Company Application for a General Rate Revision*, Docket No. UG 152, Order 03-507 at 7 (Aug 27, 2003).

1 investigation had NW Natural make several changes to the WARM
2 program.⁸

3 Similar to NW Natural customers' requests in Docket UM 1750, a
4 large number of Aspen Lakes Water's customers contacted the
5 Commission in this Docket, requesting the rates of Aspen Lakes Water
6 be reviewed.

7 **Q. Has the Commission asserted rate regulation under similar**
8 **circumstances in the past?**

9 A. Yes. In *In re Mill Mar Estates Water, Inc.* (OPUC Docket WJ 19), the
10 Commission asserted rate regulation over a utility that was charging
11 above the threshold upon receipt of petitions from more than twenty
12 percent of customers. Notably, the utility did not provide notice to
13 customers as an impetus to the petition process, and the Commission
14 noted that "since [it] has already received a sufficient number of
15 customer petitions, requiring the utility to provide adequate notice at this
16 time would be superfluous."⁹

17 **Recommendation**

18 Staff recommends the Commission assert rate regulation on Aspen
19 Lakes Water and order the company to file a rate case/tariffs within
20 60 days of the final order in this case.

⁸ Per the stipulation filed as a part of Order 15-264, NW Natural was subject to change the monthly WARM adjustment cap and floor rates for residential and commercial customers and the application of WARM adjustments that exceeded the new cap and floor rates; and add additional Notice requirements for non-weather sensitive customers.

⁹ *In re Mill Mar Estates Water, Inc.*, OPUC Docket N. WJ 19, Order No. 08-354 (July 3, 2008).

1 **Q. Does this conclude your testimony?**

2 A. Yes.

CASE: WJ 34
WITNESS: SCOTT SHEARER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

Staff Exhibit 201

Witness Qualification Statement

August 23, 2018

WITNESS QUALIFICATION STATEMENT

NAME: Scott Shearer

EMPLOYER: Public Utility Commission of Oregon

TITLE: Senior Compliance Specialist
Consumer Services Section

ADDRESS: 201 High Street SE. Suite 100
Salem, OR. 97301

EDUCATION: Corban University Salem, Oregon
Bachelors of Science in Business, Organizational
Leadership

EXPERIENCE:

2014 - Current - Heritage Grove Credit Union
Board of Directors/Chairman of the Board
Provide strategic direction for a credit union
with assets of over 110 million dollars.
Reviewing and approving monetary
expenditures and budget.

2007 - Current - Oregon Public Utility Commission
Telecommunications Specialist/Consumer
Specialist/Senior Compliance Specialist
Reviewing and applying Oregon Administrative
Rules to tariffs in relation to consumer
complaints.

2006 - 2007 - Oregon Department of Justice/Division of
Child Support
Administrative Specialist
Researching responsible parties in Child
Support orders

1999 - 2006 - EPIQ Systems/Poorman Douglas Corp.
Claims Analyst/Senior Claims Analyst
Reviewing and implementing orders and
settlements for the largest Class Action
Lawsuit administrator in the United States.
Auditing and processing class action lawsuits
with payouts from two-hundred thousand to
over one billion dollars to claimants.

CASE: WJ 34
WITNESS: SCOTT SHEARER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

Staff Exhibit 202

**Aspen Lakes notice of rate increase
and right to petition**

August 23, 2018

Aspen Lakes Utility Co., LLC
16900 Aspen Lakes Drive
Sisters, OR 97759

March 9, 2017

Re: Rate Increase and Notice of Right to Petition

With this letter, you are receiving a formal Notice of Right to Petition for Rate Regulation. Last year, we consulted with the Oregon Public Utility Commission (PUC), the agency that regulates utility rates, regarding possible fee increase notice requirements. At that time, they determined that our rate increase did not require a notice to users because they determined that irrigation was not part of the calculation. They have since reconsidered that position and determined that our water rates now meet the notice requirements for rate increases, which also allows our customers to petition for rate regulation.

The rates for the Aspen Lakes system are higher than some local utilities, but are in line with others. Aspen Lakes serves a relatively small customer base with above normal flows and capabilities. The system includes two wells, which provide a backup and full fire flows. The primary well has a 40 hp variable frequency drive pump that provides 200 gpm variable flow with a constant pressure for domestic use. The second well has a 2,000 gpm pump that is used primarily for filling the pond, but is linked to the domestic system such that it can cover full fire flows or be utilized as a backup when the first pump is off-line for maintenance or repairs.

The system was designed with oversized main lines to allow for fire flows to the homesites. These flows helped the Aspen Lakes development attain an insurance rating of ISO 3. In comparison, the cities of Redmond and Bend are both ISO 4 and Sisters is a 5 (the lower the number the better). Our ISO 3 results in a significant savings in fire insurance costs to every homeowner. However, this additional capability costs more to maintain.

Another consideration for higher than average monthly water bills is the higher than average lot size at Aspen Lakes and larger landscape areas. A typical city lot is roughly 6,000 square feet with only a fraction of that devoted to landscaping. Aspen Lakes lots are 7 times that size and proportionately, much larger landscapes. The state average for water use and rates also includes the wet Willamette Valley which has 4 times the rainfall of Central Oregon and requires much less landscape irrigation. Within Aspen Lakes, there are roughly 20 acres of irrigation just for homeowner landscaping and requires the use of the golf course irrigation system for delivery.

The golf course buys water from the utility, which is delivered to the pond on the #11 hole. This water is then pressurized and distributed throughout the golf course and to the homes through the use of three 100 hp variable frequency drive pumps owned and operated by the golf course. This high capacity pump station is expensive to operate and adds additional pumping costs to the delivery of irrigation water,

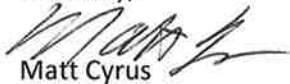
which is actually pumped twice ... once from the ground to the pond and then from the pond to the course and homesites. This second pumping cost is why there is a difference in water cost between the homeowner irrigation water and the golf course. The golf course pays for the operation of that pump station.

The water system was built in 1996 and started serving customers at that time. The rates at that time were \$15 for the base rate with no overage fee. The base rate was raised by \$3 to \$18 in 2002 and the overage fee of \$1 per 1,000 gallons was introduced in 2004. In 2016, after 12 years without an increase, the overage price was raised to \$2 per 1,000 gallons. The base price was raised by \$4, from \$18 to \$22 in January of 2017 after 15 years without an increase. Operational costs increase each year and Aspen Lakes Utility has been absorbing those increased costs for many years. The increase is higher than normal because it is long overdue and necessary to play catch up with costs.

Should 20% of our customers petition the PUC for rate regulation, we will be required to incur additional costs for accountants and attorneys to represent us in this expensive process. These additional costs would also be added to the new rates. We believe the rates are reasonable and in-line with the services provided. The old rates do not provide sufficient funds for equipment upgrades such as a state mandated shelter over the pump at Hwy 126, nor does it provide for necessary cash reserve accounts to replace aging equipment or system upgrades such as a generator to prevent loss of pressure during power outages. Given, the makeup of the system and relative low customer base, we believe it is likely that rate regulation by the PUC would result in rate increases that are higher than those currently in place.

If you have any questions, feel free to call me at 541-771-4980.

Sincerely,



Matt Cyrus

Aspen Lakes Utility Co., LLC

NOTICE OF CUSTOMER'S RIGHT TO PETITION FOR RATE REGULATION

March 9, 2017

Aspen Lakes Utility Co., LLC
16900 Aspen Lakes Dr.
Sisters, OR 97759

541-549-3660 Business Phone

541-908-6539 Emergency Phone

accounting@aspenlakes.com Email Address

The purpose of this notice is to inform you that the Public Utility Commission of Oregon has determined that **Aspen Lakes Utility Co., LLC** is charging above the **average** monthly service rate of \$45.00 for your water service.

NOTICE FROM THE PUBLIC UTILITY COMMISSION OF OREGON:

Customers have the opportunity to file a petition to have the water utility's rates regulated by the Commission. The water utility is charging rates in excess of the threshold levels set by the Commission. If the Commission receives valid petitions from at least 20 percent of the customers, the Commission will assert jurisdiction over your water utility. Rate regulation requires that all rates and rate changes be approved by the Commission. The Commission will set appropriate cost-based rates. If the Commission does not receive the sufficient number of valid customer petitions, the water utility's current rates will remain in effect.

The water utility will provide a complete customer list (including names and addresses) within 10 days of receiving such a request from any customer. **Be aware that Commission-set rates may be above those currently being paid by customers.**

Petition forms are available on the Commission's website at:

<http://www.puc.state.or.us/Pages/Information-for-Customers.aspx>. The petitions must be completed and signed by the customer and must be received by the Commission within 45 days of this notice. Copies of petitions or petitions without an original signature will not be accepted.

Completed petitions must be mailed to the Consumer Services Section, PO Box 1088, Salem, Oregon 97308-1088 **or** delivered to 201 High Street SE, Suite 100, Salem, Oregon 97301. Petitions may not be filed electronically. Petitions may not be withdrawn or rescinded.

Customers with questions may contact the Customer Services Section at 1-800-522-2404.

Aspen Lakes Development
16900 Aspen Lakes Drive
Sisters, OR 97759

Randy & Frances Randall
1522 NE Jackson School Rd.
Hillsboro, OR 97124

Bruce Olivier
17017 Golden Stone Drive
Sisters, OR 97759

Randy & Frances Randall
1522 NE Jackson School Rd.
Hillsboro, OR 97124

Steven & Denise Banton
17007 Golden Stone Drive
Sisters, OR 97759-9698

Gregory & Jennifer McWade
5347 Red Leaf Street
Lake Oswego, OR 97035

Don & Connie Dooley
3040 Stonebridge Way
Lake Oswego, OR 97034

Randy & Frances Randall
1522 NE Jackson School Road
Hillsboro, OR 97124

Mark L. VanBuskirk
8035 SW Garden Home Road
Portland, OR 97223

John & Joy Robertson
16847 Golden Stone Dr.
Sisters, OR 97759-9696

Aspen Lakes Development
16900 Aspen Lakes Drive
Sisters, OR 97759

Charles & Patricia Drake
P.O. Box 3500-188
Sisters, OR 97759

D.S. Dunlap
16897 Algonquin St. Suite A
Huntington Beach, CA 92649

Aspen Lakes Development
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Sisters, OR 97759

Chris & Kyle Gibson
16900 Green Drake Ct.
Sisters, OR 97759

D.S. Dunlap
16897 Algonquin St. Suite A
Huntington Beach, CA 92649

Aspen Lakes Development
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Sisters, OR 97759

Kenneth and Nancy Depriest
1058 Brookfield Patch
Keller, TX 76248

Ken & Sheryl Ruetters
16897 Golden Stone Dr.
Sisters, OR 97759

Grant & Deborah Prentice
2447 NW Jonathon Place
Portland, OR 97229

Eugene Kremer
10612 N. Crestview Drive
Fountain Hills, AZ 85268

John & Kristin Tackmier
17000 Green Drake Ct.
Sisters, OR 97759

John & Anne Fletcher
1420 Terry Ave. #1806
Seattle, WA 98101

Charles & Betty Fadeley
P.O. Box 117
Sisters, OR 97759

Janet & Scott Lamoreaux
16951 Lady Caroline Dr.
Sisters, OR 97759

Dan & Fran Berry Living Trust
17041 Lady Caroline Drive
Sisters, OR 97759

Robert & Doris Hodge
16965 Green Drake Court
Sisters, OR 97759

Dave and Sheryl Whent
P.O. Box 1654
Sisters, OR 97759

David Hjorth & Kay Wilson
16802 Royal Coachman Dr.
Sisters, OR 97759

Roger and Edie Jensen
P.O. Box 686
Redmond, OR 97756

JH Herscher Family Ltd Partnership
16951 Lady Caroline Dr.
Sisters, OR 97759
Atten: Scott Lamoreaux

Ken & Mary Lee Aduddell
16812 Royal Coachman Dr.
Sisters, OR 97759

John & Carla Powell
16945 Green Drake Ct.
Sisters, OR 97759

Jeff & Amy Sills
16981 Lady Caroline Drive
Sisters, OR 97759

Robert & Carol Adams
16822 Royal Coachman Dr.
Sisters, OR 97759

Carl Urben
16935 Green Drake Ct.
Sisters, OR 97759

John P and Robin Gold
16991 Lady Caroline Drive
Sisters, OR 97759

Gary & Nancy Kneisel
7510 NW McDonald Circle
Corvallis, OR 97330

Jon & Nancy Egge
PO Box 720
Mesquite, NV 89024

William Reed
P.O. Box 218
Sisters, OR 97759

Paul & Mary Shea
16842 Royal Coachman Dr
Sisters, OR 97759

Michelle & James P. Sandoz, Jr.
16911 Lady Caroline Dr.
Sisters, OR 97759

James & Cynthia Wojtasek
16515 Wren Lane
Sisters, OR 97759

Alan Shimizu
Michael E. Keller
9060 Tudsbury Road
Loomis, CA 95650

Vern & Mary Heiman
16921 Lady Caroline Dr.
Sisters, OR 97759

Robert & Marypat Hill
1737 Sky Terrace SE
Salem, OR 97306

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1771 La Plaza Drive
San Marcos, CA 92078

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7250 Avalon Drive
Corvallis, OR 97330

Michael & Denise Cooper
David Hjorth & Kay Wilson
5845 SW Wichuta Way
Tualatin, OR 97062

Lewis & Eileen Rothrock
16862 Royal Coachman Drive
Sisters, OR 97759

Dr. Dave & Mary Ingraham
16941 Lady Caroline Dr.
Sisters, OR 97759

Joseph & Sandra Doman
17031 Lady Caroline Dr.
Sisters, OR 97759

Brian and Melinda Witt
P.O. Box 1866
Sisters, OR 97759

Docket No. WJ 34

David and Patsy Jones
23098 Watercourse Way
Bend, OR 97701

Ray & Barbara Barnum
16962 Royal Coachman Drive
Sisters, OR 97759

Reinhard & Kathy Scholz
17033 Royal Coachman Dr
Sisters, OR 97759

William & Lynette Wilson
16882 Royal Coachman Dr
Sisters, OR 97759

Beverly Ross
16972 Royal Coachman
Sisters, OR 97759

Linda & David Cox
17023 Royal Coachman Dr.
Sisters, OR 97759

Douglas E Kulper
825 Fredensborg Canyon Road
Solvang, CA 93463

Edward Woods
69145 Damsel Fly Ct.
Sisters, OR 97759

Ronald Schumacher & Susan Hyder
620 SW Carmel Circle
Willsonville, OR 97070

Robert & Edie Shelton
16902 Royal Coachman
Sisters, OR 97759

Vincent & Rhonda Mastropietro
4930 Anna Drive
San Jose, CA 95124

David & Sheila Ellsworth
17439 SW Rivendell Drive
Durham, OR 97224

Chuck Gibson
16912 Royal Coachman Drive
Sisters, OR 97759

Dennis & Vicky Regen
P.O. Box 670
Lincoln City, OR 97367

Richard May
P.O. Box 596
North Plaines, OR 97133

Gary & Barbara Barnett
16922 Royal Coachman Drive
Sisters, OR 97759

Richard Coyne
17262 SW Cedar Rd.
Lake Oswego, OR 97034

David & Catherine Childress
16983 Royal Coachman Drive
Sisters, OR 97759

John & Tamara Dickson
1887 S.W. Haskins Ct.
Troutdale, OR 97060

Claude & Jean Nave
69120 Damsel Fly Ct.
Sisters, OR 97759

Thomas & Debra Braun
403 Belle Monti Court
Aptos, CA 95003

Chris & Pam Green
16940 Green Drake Ct.
Sisters, OR 97759

Brian Chugg
PO Box 20082
Mesa, AZ 85277

John & Judith Troike
16963 Royal Coachman Dr.
Sisters, OR 97759

Michael & Mary Fry
4825 Sky Ridge Dr.
Yorba Linda, CA 92887

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5133 Proctor Ave
Oakland, CA 94618

Tim & Eva Ross
16953 Royal Coachman Drive
Sisters, OR 97759

Barry & Judy Valder
16952 Royal Coachman
Sisters, OR 97759

John & Kelly Christen
17010 Royal Coachman
Sisters, OR 97759

David & Berni Seibel
16960 Green Drake Ct.
Sisters, OR 97759

Docket No. WJ 34
Doug Mombell & Dian Connett
16943 Royal Coachman
Sisters, OR 97759

James & Susan Sanger
16970 Green Drake Ct.
Sisters, OR 97759

Brian & Nicolette Linse
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Portland, OR 97225

Oscar & Guadalupe Pena
16933 Royal Coachman Drive
Sisters, OR 97759

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10612 N Crestview Dr.
Fountain Hills, AZ 85268

Stephen Harder
1455 SW Myrtle Dr.
Portland, OR 97201

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16923 Royal Coachman Drive
Sisters, OR 97759

Lot 80 Rodney & Karen Stuve
17082 Royal Coachman Drive
Sisters, OR 97759

Kenneth & Connie Chin
19352 Trino Circle
Yorba Linda, CA 92886

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Sisters, OR 97759

Michael E. Keller
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Loomis, CA 95650

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17121 Lady Caroline Dr.
Sisters, OR 97759

Harold & Frances Kibby
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Sisters, OR 97759

Steve & Terri Loveland
17138 Caddis Court
Sisters, OR 97759

Michael & Heidi Peyton
17111 Lady Caroline Drive
Sisters, CA 97759

Albert & Jane Krause
11111 SE 18th St.
Vancouver, WA 98664

Robert & Gayle Landwehr
17148 Caddis Court
Sisters, OR 97759

Robert & Doris Hodge
16965 Green Drake Court
Sisters, OR 97759

Robert & Harriet Rossio
16863 Royal Coachman Drive
Sisters, OR 97759

Jerry Slaughter
PO Box 2402
Sisters, OR 97759

Stephen and Carol Dixon
17054 Lady Caroline
Sisters, OR 97759

Mark & Diane Bennett
2133 Wood Duck Way
Eugene, OR 97401

Allyn & Elaine Gilbert
17168 Caddis Ct.
Sisters, OR 97759

Lot 94 John & Thalene Hebeisen
17064 Lady Caroline Drive
Sisters, OR 97759

Thomas & Diedra Thompson
17100 Golden Stone Drive
Sisters, OR 97759

Kent & Kathy Beebe
15510 SE 38th Circle
Vancouver, WA 98683

Shirley Milroy
1102 N. Springbrook Rd.
251
Newberg, OR 97132

Norman & Kelly Sanesi
17062 Royal Coachman Drive
Sisters, OR 97759-9834

Boyd & Kay Levet
17157 Caddis Ct.
Sisters, OR 97759

Russell & Phyllis Smith
17084 Lady Caroline Dr.
Sisters, OR 97759

Docket No. WJ 34

Gary & Inga Mansker
11520 Seabeck Hwy
Seabeck, WA 98380

aspen lakes Golf Course
16900 Aspen Lakes Dr.
Sisters OR 97759

Michael and Heidi Peyton
5135 SW Joshua St.
Tualatin, OR 97062

Steven & Lynda Jaspersen
160 Oak Street
Suite #186
Sisters, OR 97759

aspen lakes HOA assoc
c/o cascadia management
805 SW Industrial way # 9
Bend OR 97702

CASE: WJ 34
WITNESS: SCOTT SHEARER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

Staff Exhibit 203

**Customer Petition List by
Customer Type, Validity**

August 23, 2018

Customer Petition List by Customer Type, Validity

Name ^{1,3}	Address ¹	Date Signed ¹	Co-Customer ^{1,3}	Valid ¹	Customer ²	Customer Type ²
ALEOA	17045 Royal Coachman	9/11/2017		X	Yes	Commercial/Standby Fire
AK	16893 Royal Coachman	10/5/2017	JK	X	Yes	Residential/Standby Fire
AG	17168 Caddis	10/15/2017	EG	X	Yes	Residential/Standby Fire
BR	16972 Royal Coachman	10/5/2017		X	Yes	Residential/Standby Fire
BL	17157 Caddis	9/11/2017		X	Yes	Residential/Standby Fire
BW	16872 Royal Coachman	10/11/2017	MW	X	Yes	Residential/Standby Fire
BO	17017 Golden Stone	10/10/2017		X	Yes	Residential/Standby Fire
CF	16975 Green Drake	10/18/2017		X	Yes	Residential/Standby Fire
CG	16940 Green Drake	10/11/2017		X	Yes	Residential/Standby Fire
CN	69120 Damsel Fly	10/9/2017		X	Yes	Residential/Standby Fire
DH	16802 Royal Coachman	10/5/2017	KW	X	Yes	Residential/Standby Fire
DS	16960 Green Drake	10/11/2017	BS	X	Yes	Residential/Standby Fire
DDT	16927 Golden Stone	11/20/2017		X	Yes	Residential/Standby Fire
ES	16902 Royal Coachman	10/16/2017	RS	X	Yes	Residential/Standby Fire
EW	69415 Damsel Fly	10/19/2017		X	Yes	Residential/Standby Fire
GH	17010 Royal Coachman	10/9/2017		X	Yes	Residential/Standby Fire
HK	16913 Royal Coachman	11/4/2017		X	Yes	Residential/Standby Fire
JJ	16983 Royal Coachman	10/4/2017	GJ	X	Yes	Residential/Standby Fire
JS	17158 Caddis	10/4/2017		X	Yes	Residential/Standby Fire
JH	16923 Royal Coachman	10/5/2017		X	Yes	Residential/Standby Fire
JR	16847 Golden Stone	9/21/2017		X	Yes	Residential/Standby Fire
JT	16963 Royal Coachman	10/9/2017	JT	X	Yes	Residential/Standby Fire
Je	16910 Green Drake	10/6/2017		X	Yes	Residential/Standby Fire
JD	17031 Lady Caroline	10/9/2017		X	Yes	Residential/Standby Fire
LR	16862 Royal Coachman	10/19/2017	ER	X	Yes	Residential/Standby Fire

¹ Name, Address, Date Signed, Co-Customer, and Signed data extracted from Customer Petition Filing.² Customer and Customer Type extracted from Aspen Lakes Utilities response to OPUC DR-7, Bates Nos. ALU_000489-000496³ Customer and Co-Customer Names Redacted for Confidentiality

Customer Petition List by Customer Type, Validity (cont.)

Name ¹	Address ¹	Date Signed ¹	Co-Customer ¹	Valid ¹	Customer ²	Customer Type ²
MH	16921 Lady Caroline	10/18/2017	VH	X	Yes	Residential/Standby Fire
MP	1711 Lady Caroline	10/5/2017		X	Yes	Residential/Standby Fire
MK	16930 Green Drake	10/5/2017			Yes	Residential/Standby Fire
OP	16933 Royal Coachman	10/13/2017		X	Yes	Residential/Standby Fire
PS	16842 Royal Coachman	10/11/2017		X	Yes	Residential/Standby Fire
RR	16877 Golden Stone	10/6/2017		X	Yes	Residential/Standby Fire
RB	16962 Royal Coachman	10/7/2017		X	Yes	Residential/Standby Fire
RL	17148 Caddis	10/11/2017		X	Yes	Residential/Standby Fire
RG	16991 Lady Caroline	10/5/2017	JG	X	Yes	Residential/Standby Fire
SL	16951 Lady Caroline	10/5/2017	JL	X	Yes	Residential/Standby Fire
SR	16897 Golden Stone	10/31/2017	KR	X	Yes	Residential/Standby Fire
SD	17054 Lady Caroline	10/4/2017	CD	X	Yes	Residential/Standby Fire
TT	17100 Golden Stone	10/5/2017		X	Yes	Residential/Standby Fire
TR	16953 Royal Coachman	10/23/2017		X	Yes	Residential/Standby Fire
DD	16987 Golden Stone	10/24/2017	CD	X	Yes	Standby Fire Protection
DDT	16907 Golden Stone	11/20/2017		X	Yes	Standby Fire Protection
HK	16903 Royal Coachman	11/4/2017		X	Yes	Standby Fire Protection
JW	17001 Lady Caroline	10/6/2017		X	Yes	Standby Fire Protection
JHH	16971 Lady Caroline	10/5/2017		X	Yes	Standby Fire Protection
MF	16942 Royal Coachman	10/8/2017	MF	X	Yes	Standby Fire Protection
MP	17087 Golden Stone	10/5/2017		X	Yes	Standby Fire Protection
MK	Lot 81 Aspen Lakes	10/5/2017			Yes	Standby Fire Protection
RR	16857 Golden Stone	10/6/2017		X	Yes	Standby Fire Protection
RR	16887 Golden Stone	10/6/2017		X	Yes	Standby Fire Protection
SW	16961 Lady Caroline	10/24/2017		X	Yes	Standby Fire Protection

¹ Name, Address, Date Signed, Co-Customer, and Signed data extracted from Customer Petition Filing.² Customer and Customer Type extracted from Aspen Lakes Utilities response to OPUC DR-7, Bates Nos. ALU_000489-000496³ Customer and Co-Customer Names Redacted for Confidentiality

CASE: WJ 34
WITNESS: SCOTT SHEARER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

Staff Exhibit 204

Rate Schedule, Customer Counts

August 23, 2018

Rate Schedule, Customer Counts

Schedule ^{1, 2}	Service Type	Meter Type	Customer Count
Schedule No. 1a	residential domestic service	1-inch meter	80
Schedule No. 1b	residential irrigation service	1-inch meter	79
Schedule No. 2c	commercial domestic service	1-inch meter	0
Schedule No. 2d	commercial irrigation service	1-inch meter	0
Schedule No. 1e	residential domestic service	greater than 1-inch meter	0
Schedule No. 1f	residential irrigation service	greater than 1-inch meter	0
Schedule No. 2g	commercial domestic service	greater than 1-inch meter	2
Schedule No. 2h	commercial irrigation service	greater than 1-inch meter	2
Schedule No. 3i	charges to customers with a	1-inch meter	80
Schedule No. 3j	charges to customers with a	greater than 1-inch meter	2

¹ Schedule Data from Aspen Lakes Utilities response to OPUC DR-1

² Alphabetical schedule designations are added for ease of reference on Staff/205, Shearer/4

CASE: WJ 34
WITNESS: SCOTT SHEARER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

Staff Exhibit 205

Petition Percentage Calculations

August 23, 2018

Petitions - Commercial, Residential Calculations

Petitions Received Breakdown	50
<i>Incomplete Petitions (1 standby fire protection, 1 residential)</i>	2
<i>Commercial Customer Petitions</i>	1
<i>Residential Customer Petitions</i>	37
Customer Count from Company Response to Commission Data Request 1 (DR-1)	
<i>Commercial Customer (Standby Fire Protection included)</i>	2
<i>Residential Customers (Includes Standby Fire Protection and Irrigation service*)</i>	80
Minimum Petition Threshold (OAR 860-036-1920 = 20% of Customers)	17
Valid Petitions (Commercial and Residential Customers only)	38
Total Customer Count (Commercial and Residential Customers Only)	82
Percentage of Valid Customer Petitions to Customer Count (Petitions divided by Customers)	46%

Petitions - Commercial, Residential, Standby Fire Protection Calculations

Petitions Received Breakdown	50
<i>Incomplete Petitions (1 standby fire protection, 1 residential)</i>	2
<i>Commercial Customer Petitions</i>	1
<i>Residential Customer Petitions</i>	37
<i>Stand-by Fire Protection Customer Petitions (Service to vacant lots only)</i>	10
Customer Count from Company Response to Commission Data Request 1 (DR-1)	
<i>Commercial Customer (Standby Fire Protection included)</i>	2
<i>Residential Customers (Includes Standby Fire Protection and Irrigation service*)</i>	80
<i>Stand-by Fire Protection (Service to vacant lots only)</i>	36
Minimum Petition Threshold (OAR 860-036-1920)	40
Valid Petitions (Commercial, Residential, and Stand-by Fire Protection Customers)	48
Total Customer Count (Commercial, Residential, and Stand-by Fire Protection Customers)	118
Percentage of Valid Customer Petitions to Customer Count (Petitions Divided by Total Customers)	41%

Petitions - Commercial, Residential, Irrigation, Standby Fire Protection Calculations

Petitions Received Breakdown	88
<i>Incomplete Petitions (1 standby fire protection, 1 residential)</i>	2
<i>Commercial Customer Petitions</i>	1
<i>Commercial Irrigation Customer Petitions</i>	1
<i>Residential Customer Petitions(Includes Stand-by Fire Protection Service)</i>	37
<i>Residential Irrigation Customer Petitions</i>	37
<i>Stand-by Fire Protection Customer Petitions (Service to vacant lots only)</i>	10
Customer Count from Company Response to Commission Data Request 1 (DR-1)	
<i>Commercial Customer (Standby Fire Protection included)</i>	2
<i>Commercial Irrigation Customers</i>	2
<i>Residential Customers (Includes Standby Fire Protection)</i>	80
<i>Residential Irrigation Customers</i>	79
<i>Stand-by Fire Protection (Service to vacant lots only)</i>	36
Minimum Petition Threshold (OAR 860-036-1920)	40
Valid Petitions (Commercial, Residential, Irrigation, and Stand-by Fire Protection)	86
Total Customer Count (Commercial, Residential, Irrigation, and Stand-by Fire Protection)	199
Percentage of Valid Customer Petitions to Customer Count	43%

Petition - Rate Schedule Type Calculations

Petitions Received Breakdown	127
<i>Incomplete Petitions (Schedule 1a)</i>	1
<i>Incomplete Petitions (Schedule 1b)</i>	1
<i>Incomplete Petitions (Schedule 3i)</i>	1
<i>Commercial Customer Petitions (Schedule 2g)</i>	1
<i>Commercial Irrigation Customer Petitions (Schedule 2h)</i>	1
<i>Residential Customer Petitions (Schedule 1a)</i>	37
<i>Residential Irrigation Customer Petitions (Schedule 1b)</i>	37
<i>1-Inch Stand-by Fire Protection Customer Petitions (Schedule 3i)</i>	47
<i>Greater than 1-Inch Stand-by Fire Protection Customer Petitions (Schedule 3j)</i>	1
Customer Count from Company Response to Commission Data Request 1 (DR-1)	
<i>Commercial Customer (Schedule 2g)</i>	2
<i>Commercial Irrigation Customer (Schedule 2h)</i>	2
<i>Residential Customer (Schedule 1a)</i>	80
<i>Residential Irrigation Customer (Schedule 1b)</i>	79
<i>1-Inch Stand-by Fire Protection Customer (Schedule 3i)</i>	80
<i>Greater than 1-Inch Stand-by Fire Protection Customer (Schedule 3j)</i>	2
Minimum Petition Threshold (OAR 860-036-1920)	49
Valid Petitions (Total of all schedules)	124
Total Customer Count (Total of all schedules)	245
Percentage of Valid Customer Petitions to Customer Count	51%

Petition - Percentages by Customer Type Calculations

Petitions Received Breakdown (Total Petitions)	50
<i>Incomplete Petitions (1 standby fire protection, 1 residential)</i>	2
<i>Commercial Customer Petitions</i>	1
<i>Residential Customer Petitions</i>	37
<i>Stand-by Fire Protection Customer Petitions (Service to vacant lots only)</i>	10
Customer Count from Company Response to Commission Data Request 1 (DR-1)	
<i>Commercial Customer (Standby Fire Protection included)</i>	2
<i>Residential Customers (Includes Standby Fire Protection and Irrigation service*)</i>	80
<i>Stand-by Fire Protection (Service to vacant lots only)</i>	36
Petition percentage by Customer Class	
<i>Commercial (Petitions count divided by customer count)</i>	50%
<i>Residential (Petitions count divided by customer count)</i>	46%
<i>Stand-by Fire Protection (Petitions count divided by customer count)</i>	28%