

December 15, 2006

THE HONORABLE SAMUEL J. PETRILLO  
ADMINISTRATIVE LAW JUDGE  
PUBLIC UTILITY COMMISSION OF OREGON  
PO BOX 2148  
SALEM, OR 97308-2148

RE: Roats Water System, Inc. vs. Golfside Investments, LLC  
PUC Case No. UM 1248  
Stipulated Answers to Clarifying Questions

Dear Judge Petrillo:

The following are the additional responses of the parties to Clarifying Questions Number 10 and 11:

10. On the date that the conversion from a manufactured home subdivision to a PUD subdivision became effective, were any of the lots receiving permanent water service from Roats?

Answer: Yes.

10(a). If yes, specify for each lot: (a) the lot number, (b) the type of dwelling (e.g., manufactured home or "stick-built" home), and (c) the date that Roats began providing permanent water service to the lot.

Answer: See attached breakdown prepared by Roats Water Systems.

\* Roats believes lot 91 was converted from a manufactured home to a site-built home but Golfside's legal counsel has not been able to confirm today whether such conversion was made. Both parties agree that permanent water service began on lot 91 prior to conversion to a PUD (9/22/03). Golfside disagrees with some of Roats' specific dates for the beginning of water service, but Golfside agrees with Roats that 52 lots were receiving permanent water service before the conversion to a PUD.

11. Did Roats begin providing permanent water service to any of the lots in the PUD subdivision after the conversion from a manufactured home subdivision became effective?

Answer: Yes.

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11(a). If yes, specify for each lot: (a) the lot number, (b) the type of dwelling (e.g., manufactured home or "stick-built" home), and (c) the date that Roats began providing permanent water service to the lot.

Answer: See attached breakdown prepared by Roats Water Systems.

Roats has recently received requests for service on lots 55 and 57. Golfside agrees that lot 57 should also be added to the list of site-built homes but will need an opportunity to confirm the status of lot 55. Also, Golfside's records differ concerning service dates on a number of lots but the parties agree that the records are accurate as to whether the services began before or after conversion to a PUD on March 17, 2005.


Roat's has begun "new" service for 17 lots with "site-built" homes after conversion to a PUD on March 17, 2005. Roats believes it is providing service to one site-built home on a lot previously occupied by a manufactured home (lot 91). Water service for the previously existing manufactured home on that lot began 9/22/03).

The number of vacant lots is 23 or 24 depending on the status of lot 55, which Golfside will confirm.

Both parties expect continued changes in these numbers. Legal counsel is attempting to provide the best information possible. Let us know if you have any questions.

Sincerely,

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Mark G. Reinecke,  
Attorney for Roats Water Systems

  
Brian C. Hickman,  
Attorney for Golfside Investments

Prepared by Mark G. Reinecke  
cc: [Jason.W.Jones@state.or.us](mailto:Jason.W.Jones@state.or.us)



27		MH	7/31/2001
28		MH	1/31/2001
29		MH	1/31/2001
30		MH	1/31/2001
31		MH	1/24/2001
32		MH	1/31/2001
33		MH	1/31/2001
34		MH	6/24/2003
35		MH	9/25/2001
36		MH	9/25/2001
37		NI	
38		NI	
39		NI	
40		NI	
41		NI	
42		MH	12/16/2002
43		MH	1/21/2003
44		MH	4/29/2002
45		NI	
46		MH	12/3/2003
47		NI	
48		MH	6/12/2002
49		MH	10/22/2001
50		MH	5/29/2001
51		MH	10/7/2002
52		SB	5/12/2006
53		NI	
54		NI	
55		NI	
56		SB	11/3/2006
57		NI	
58		MH	10/19/2004
59		SB	11/3/2006
60		SB	10/30/2006
61		SB	10/16/2006
62		SB	10/16/2006
63		SB	10/16/2006

64		SB	5/12/2006
65		SB	
66		SB	2/14/2006
67		MH	9/27/2004
68		NI	
69		NI	
70		NI	
71		NI	
72		NI	
73		MH	3/3/2004
74		MH	3/3/2004
75		SB	7/13/2006
76		NI	
77		NI	
78		NI	
79		NI	
80		NI	
81		NI	
82		SB	7/20/2006
83		MH	2/9/2005
84		SB	7/20/2006
85		SB	8/28/2006
86		NI	
87		SB	10/16/2006
88		NI	
89		NI	
90		MH	6/21/2004
91		SB	9/22/2003
92		MH	3/3/2004
93		SB	5/18/2006
94		SB	7/20/2006