

The Honorable Judge Pat Power
Public Utility Commission of Oregon
Administrative Hearings

March 4, 2017

Dear Sir,

This letter is in response to Staff's Motion For Leave to Supplement the Record and its testimony.

In its testimony, Staff argues that the difference in customer count due to the removal of Crown Villa as a customer changes the allocation to domestic and irrigation customers and, therefore; should not be considered.

While Staff recommends the Commission recognize the addition of Avion as a late addition to the rate case without regard to the resulting change to the allocations, it recommends **not** recognizing the loss of Crown Villa as a late subtraction to the rate case because it results in a change to the allocations. Isn't this a distinction without a difference?

Avion's additional \$64,000 in annual revenue represents the addition of one customer (Avion) with 180 Nottingham multipliers, and Crown Villa's revenue loss of \$18,604.80 represents one customer (Crown Villa) with 65 multipliers.

If staff wants to add Avion as a customer, it would seem to be reasonable that the same approach should be applied to the removal of Crown Villa as a customer. It does not seem reasonable to recognize one without the other. Both the addition and loss of revenues should be addressed in the current rate case.

Also I would like to address the future effective date for rates. Because the expenses associated with the acquisition of Juniper began February 1st the new rates are needed as soon as possible to offset these expenses.

Sincerely,



Bill Roats
President
Roats Water System