

PUBLIC UTILITY COMMISSION OF OREGON

Docket No. WA 83 – In the Matter of Sunriver Water LLC, Expanded Service Territory Application

I wish to voice my concerns/comments/questions regarding WA 83 - Sunriver Water's Supplement to Application dated 7/20/2021

<https://edocs.puc.state.or.us/efdocs/HAQ/wa83haq14840.pdf>

Robert Gamble
Sunriver, Oregon
September 08, 2021

Number 1

Exhibit 2 Water Service Agreement

Agreement 1.C. states “Caldera Springs Annexation water service will include a maximum of 395 residential units.”

The Exclusive Service Territory Application proposes 415 new residential customers in the Annexation, but the Water Service Agreement indicates water service to 395 residential units. What is the reason for this discrepancy? Would Sunriver Water provide water service to 395 of the 415 units proposed in the Annexation? <https://edocs.puc.state.or.us/efdocs/HAA/haa124432.pdf>

Agreement 3. G. (4) states “All water... shall be potable.”

What is in the public interest to specify potable water for: “dust control, fire protection, restoration, construction, irrigation water” as stated in 1.C?

Number 2

OAR 860-036-1820(1)(k) Financial statements demonstrating applicant's financial capability.

“Sunriver Water is a wholly-owned subsidiary of NW Natural Water of Oregon, LLC, which in turn is a wholly-owned subsidiary of NW Natural Water Company, LLC, which in turn is a wholly-owned subsidiary of Northwest Natural Holding Company (“NW Holdings”). NW Holdings’ Form 10-K for 2020 and its Form 10-Q for the first quarter of 2021, filed with the Securities and Exchange Commission

(“SEC”) on February 26 and May 5, 2021, respectively, are attached as Exhibits 4 and 5 of this Supplemental Update.”

Exhibits 4 and 5 refer to NORTHWEST NATURAL HOLDING COMPANY and NORTHWEST NATURAL GAS COMPANY. SRW did not provide its books and records as separate from its parent and affiliates which was required according to Condition 12 and 15 of Order No. 19-147.

“Condition 12 provides that SRW's books and records shall be available in accordance with the applicable uniform system of accounts, or, as appropriate, generally accepted accounting principles; “SRW will utilize a different system of accounts than does its gas affiliate, NWN Gas.”

Condition 15 requires SRW to maintain its assets and liabilities, and related books and records in a way that will easily identify its individual assets and liabilities as separate and distinct from those of its parent and affiliates.”

<https://apps.puc.state.or.us/orders/2019ords/19-147.pdf>

“In addition, Sunriver Water possesses the financial ability to adequately serve the existing and proposed expanded service territories, as shown in the general rate case filed by Sunriver Water on May 28, 2021 (UW 186).”

Rather than demonstrating the financial ability to serve its existing and proposed expanded service territories, Sunriver Water through UW 186 alleges a \$726,542 shortfall in revenue and requests approval of about a 40 per cent increase in water rates. <https://edocs.puc.state.or.us/efdocs/UAA/uaa141853.pdf>

Number 3

Impact and Capacity

System Cost Allocation

“the reasonable and equitable approach is use an impact fee, or System Development Charge (SDC), to recover this capital cost from each new customer. In that way, each new customer " buys in" to the system and isn' t a burden on existing customers. Where there is excess capacity, the new customers reimburse existing customers for the value of capital costs the existing customers have already paid to build and maintain this extra capacity.

Where additional capacity is needed i. e., water storage, water pumping, etc., that cost is assigned fully to the new development.” Page 14-15 of <https://weblink.deschutes.org/cdd/DocView.aspx?id=621137&cr=1>

“The sewerage facility currently operated by SELLC (Sunriver Environmental) is not large enough to handle additional flow from South Deschutes County. The sewage collection system is not big enough to transport additional sewage through Sunriver Resort to the treatment plant; the treatment plant, effluent storage and reuse systems are not big enough to treat, store and dispose of the additional sewage” is from the Feasibility Study prepared for: Oregon Department of Environmental Quality, Deschutes County, Sunriver Environmental, LLC on March 2, 2010 prepared by: Newton Consultants, Inc., W H Pacific Engineers, Vision Engineering. Pages 54-55 of <https://weblink.deschutes.org/cdd/DocView.aspx?id=621137&cr=1>

What is the capacity of the current sewage treatment facility?

What percentage of capacity is the sewage treatment facility currently running at?

What are the impact fees for water and sewer per unit?

How were the impact fees calculated and who determined those numbers?

Would the PUC please examine the Sunriver Water submission for acknowledgement of service development compensation?

Number 4

Exclusive Service Territory Application, Section B.4 states “No other existing community water systems are located within ten miles of the development tract.”

Water Wonderland Improvement District is a water utility company located at 17153 Crane Dr, Bend, OR, 97707 which is about 5 miles from Caldera Springs.

Number 5

Groundwater and Aquifer

The Sunriver Water General Manager wrote on August 6, 2021, “Our hydrologist has confirmed that our wells are the best indicators of potential impact from external environmental factors (e.g., precipitation levels). Most of the Deschutes River water systems are tapping a shallow aquifer, whereas Sunriver Water’s wells are in a deeper aquifer.

<https://edocs.puc.state.or.us/efdocs/HAC/wa83hac142556.pdf>

“Welcome to the [USGS](https://www.usgs.gov/) (U.S. Geological Survey) in Oregon. Our mission is to... provide reliable scientific information to help Federal, State, and local agencies, Tribes, and the public make well-informed decisions. Our research is widely used to manage Oregon's water resources for the benefit and safety of people and the environment.” <https://www.usgs.gov/centers/or-water>

“Groundwater monitoring in the Deschutes Basin shows water-level declines are larger than might be expected from climate variations alone, raising questions regarding the influence of groundwater pumping, canal lining, and other human influences.” https://www.usgs.gov/centers/or-water/science/groundwater-upper-deschutes-basin-oregon?qt-science_center_objects=0#qt-science_center_objects

Would the PUC please request a second opinion of the current status of the Sunriver groundwater and Deschutes Basin aquifer from the USGS or Oregon Water Science Center?

Number 6

Eastern Expansion of Caldera Springs offered for sale at \$450,000, \$28,000,000, and \$174,000,000.

Sale of this property by the developer, Pine Forest Development, LLC c/o Sunriver Resort Limited Partnership, would suggest that the 614 acres are a separate resort rather than an annexation to an existing resort. Deschutes County Community Development approved a Final Master Plan for an annexation to Caldera Springs, not a separate resort.

The Resort would not be able to meet the Annexation CMP Decision conditions labeled as “CMP” if the property were sold.

CMP 1. states “Any substantial change in this approved use will require review through a new land use application.”

<https://weblink.deschutes.org/cdd/DocView.aspx?id=944787&cr=1>

Cascade | Sotheby's International Realty


17750 Caldera Springs Drive
Bend, OR 97707

613.99 Acres | Land | MLS# 220130939

\$450,000
Est. Payment: \$1,613/mo

Favorite | Share | Views: 13 | Days On Site: 6

Go Tour This Listing
Wednesday 08 Sep | Thursday 09 Sep | Friday 10 Sep
Schedule A Showing



Listing provided courtesy of Sunriver Realty

Property Details

Description

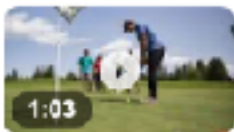
The Eastern Expansion of Caldera Springs is jaw-dropping. Uniquely nestled in the serene pine forest, the Eastern Expansion will bring an incredible collection of homesites and community amenities. Mirror Bluffs is the first new neighborhood at Caldera Springs since 2007. Featuring some of the best view homesites and an unparalleled location between the Forest-protection Wildlife Greater Deschutes and the new development, Mirror Bluffs offers an unique amenity close to or many miles from the

Contact

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<https://www.youtube.com/watch>

Sunriver Realty - 17750 Caldera Springs Drive - YouTube



17750 Caldera Springs Drive Bend 97707 \$28,000,000, MLS# 220130939

The Eastern Expansion of ...

5 days ago · Uploaded by Sunriver Realty Oregon



\$174,000,000 613.89 ac lot
Price Increase: \$146M | 17750 Caldera Spring...
● Lot / Land for sale | Zestimate®: None

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\$174,000,000 613.89 ac lot
Price Increase: \$146M
17750 Caldera Springs Dr, Bend, OR 97707
● Lot / Land for sale | Zestimate®: None

Time on Zillow **2 days** | Views **751** | Saves **19**

The Eastern Expansion of Caldera Springs is underway. Uniquely nestled in the serene pine forest, the Eastern Expansion will bring an incredible collection of homesites and community amenities. Mirror Rock is the first new neighborhood at Caldera Springs since 2007. Featuring some of the best new homesites and an unparalleled location between the forever-protected Wildlife Forest Preserve and the new amenity core. Mirror Rock offers [More](#) ✓

Listed by:
Sunriver Realty
Source: Oregon DataShare,
MLS#: 220130939

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