

Laura A. Schroeder
Oregon, Idaho,
Nevada, Washington & Utah

Therese A. Ure
Oregon & Nevada

Sarah R. Liljefelt
Oregon,
California & Utah

William F. Schroeder
(1928 - 2015)



Jakob S. Wiley
Oregon

Wyatt E. Rolfe
Of Counsel
Oregon & Washington

James Browitt
Of Counsel
Idaho & Washington

June 13, 2019

VIA ELECTRONIC MAIL ONLY

PUC Staff

Email: puc.filingcenter@state.or.us

RE: Advice No. 19-1: Amendments to Tariffs PUC Oregon No. 2

Dear PUC Staff:

Pursuant to Oregon Revised Statute (“ORS”) 757.205 and Oregon Administrative Rule (“OAR”) 860-036-2010(2), Government Camp Water Company (“the Utility”) submits the enclosed proposed tariff sheets associated with PUC Oregon No. 2, with a requested effective date of **July 14, 2019**, as follows:

- 1) First Revised Sheet No. 7: Schedule 5, Miscellaneous Service Charges;
- 2) First Revised Sheet No. 11: Rule 10: Main Line Extension Policy (OAR-036-1310);
- 3) Original Sheet 11A; and
- 4) First Revised Sheet No. 25: Rule 41: Cross Connection/Backflow Prevention Program (OAR 860-036-1680).

A redline version of the proposed tariff sheets is enclosed as Attachment A, for convenience.

To satisfy the requirements of OAR 860-036-2010(2), the Utility responds as follows:

The purpose of the filing is two-fold. First, the filing proposes to clarify the Utility’s Main Line Extension Policy expressed within Rule 10 and include a charge for main line extensions, at cost, within Schedule 5, Miscellaneous Service Charges. The proposed main line extension charge will be applicable to customers requesting a main line extension only. The proposed charge will not affect customer rates generally.

Next, the filing proposes to clarify the Utility’s policies and customer obligations within its Cross Connection/Backflow Prevention Program expressed within Rule 41. The purpose of the proposed changes is to more closely align Rule 41 with the Utility’s adopted policies and the Oregon Health Authority regulations. Amendments to Rule 41 will not affect customer rates generally.

1915 NE Cesar E. Chavez Boulevard, Portland, Oregon 97212 (503) 281-4100

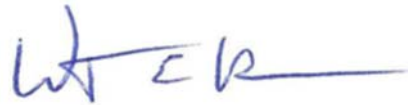
10615 Double R Boulevard, Suite 100, Reno, Nevada 89521 (775) 786-8800

www.water-law.com counsel@water-law.com

PUC Staff
June 13, 2019
Page 2 of 2

Thank you for your assistance with this matter. Please contact our office with any questions you may have.

Very truly yours,
SCHROEDER LAW OFFICES, P.C.

A handwritten signature in blue ink, appearing to read 'W E R', with a long horizontal line extending to the right.

Wyatt E. Rolfe
Laura A. Schroeder
Of Attorneys for Government Camp Water Company

TJJ:wer

Enclosures

cc: Client
Elizabeth Uzelac

SCHEDULE NO. 5

MISCELLANEOUS SERVICE CHARGES

This schedule lists the miscellaneous charges included in the Utility’s Rules and Regulations; refer to the appropriate Rules for an explanation of charges and conditions under which they apply.

<u>Connection Charge for New Service</u> (Rule Nos. 8 & 9)	
Standard ¾-inch service	At cost
Nonstandard ¾-inch service	At cost
Larger than ¾-inch	At cost
Irrigation hookup (if provided on separate system)	At cost
<u>Main Line Extension</u> (Rule No. 10)	
At cost	
<u>Meter Test</u> (Rule Nos. 19 & 20)	
First test within 12-month period	N/C
Second test within 12-month period	At Cost
<u>Pressure Test</u> (Rule No. 39)	
First test within 12-month period	N/C
Second test within 12-month period	\$35 per hour
<u>Late-Payment Charge</u> (Rule No. 21)	Pursuant to OAR 860-036-1400
<u>Deposit for Service</u> (Rule No. 5)	Pursuant to OAR 860-036-1220
<u>Returned-Check Charge</u> (Rule No. 22)	\$35
<u>Trouble-Call Charge</u> (Rule No. 35)	
During normal or after office hours	\$55 per hour
Require Backhoe	\$110 per hour
<u>Disconnection/Reconnect Charge</u> (Rule Nos. 28 & 29)	
May through September	\$50
October through April	\$64 plus cost of snow removal
<u>Unauthorized Restoration of Service</u> (Rule No. 30)	Disconnection/Reconnection charge plus costs
<u>Damage/Tampering Charge</u> (Rule No. 28)	At cost
<u>Disconnect Site-Visit Charge</u> (Rule No. 29)	\$25

Issue Date / Filing Date	June 13, 2019	Effective for Service on or after	July 14, 2019
Issued by Utility	Government Camp Water Company		

All premises supplied with water will be served through service lines so placed as to enable the Utility to control the supply to each individual premise using a valve placed within and near the line of the street, the Utility right-of-way, or at the meter.

Rule 8: Water Service Connections (OAR 860-036-1300)

The water service connection is defined as the facilities used to connect the Utility's distribution network to the point of connection at the customer's service line. The Utility owns, operates, maintains, and replaces the service connection when necessary and promptly repairs all breaks and leaks. The customer shall not be responsible for any damage or poor service due to inadequacy of the Utility's service lines or any portion of the Utility's plumbing.

Rule 9: Service Connection Charge (OAR 860-036-1300(3))

An applicant requesting permanent water service to a premise not previously supplied with permanent service by the Utility will be required to pay the cost of the service connection, including or excluding the meter as provided in Rule No. 8 and the Utility's Miscellaneous Service Charges in this tariff.

Rule 10: Main Line Extension Policy (OAR 860-036-1310)

A main line extension is defined as the extension of the Utility's main line necessary to provide service to a customer when the property does not currently have main line frontage.

Main line extension charges are stated in the Utility's tariff; Schedule 5, Miscellaneous Service Charges.

Each new customer requesting a main line extension shall advance the Utility the cost-based amount necessary to extend the main line to provide the service requested.

For a period of 7 years after construction of the requested main line extension, the Utility shall also collect from any additional applicants who connect to the main line extension an amount per foot equal to the new applicant's proportionate share of the main line extension cost for that portion used. The Utility will then refund the share differential amount to those customers who previously shared the cost of said main line extension. Refunds shall not exceed the amount originally advanced.

No part of the distribution system installed prior to the request for a main line extension shall be used to calculate any customer advance or refund.

Issue Date / Filing Date	June 13, 2019	Effective for Service on or after	July 14, 2019
Issued by Utility	Government Camp Water Company		

Rule 11: Types of Use

Water service may be supplied for residential, commercial, irrigation, temporary construction, special contracts, fire prevention, and other uses. The Utility shall file separate rate schedules for each type of use and basis of supply.

Rule 12: Multiple Residences/Commercial Users

An apartment building, mobile home park, motel, trailer camp, duplex, townhouse, or any property consisting of more than one residential/commercial unit, if served through a single service line and 3/4" or 5/8" meter, shall be considered to be equivalent to the number of dwelling units when determining the customer count.

Issue Date / Filing Date	June 13, 2019	Effective for Service on or after	July 14, 2019
Issued by Utility	Government Camp Water Company		

The Utility and its customers will comply with the requirements of OAR 952-001-0010 through and including OAR 952-001-0090 (One Call Program) regarding identification and notification of underground facilities.

Rule 41: Cross Connection/Backflow Prevention Program (OAR 860-036-1680)

It is the Utility’s mission with this program to provide safe and clean water to its customers and protect the water quality from potential threats and health hazards from cross connection or backflow. The Utility’s Cross Connection/Backflow Prevention Program is stated in this tariff. Each service connection must be in accordance with Oregon’s Drinking Water Program requirements (OAR Chap. 333, Division 61).

The following must have a BACKFLOW PREVENTION ASSEMBLY (BPA) installed by the water meter and tested on the service line:

1. Any property for which water service is classified and billed as “Commercial” pursuant to the Utility’s tariffs,
2. Any property making use of a separately plumbed sprinkler system, hot tub, solar panels, dark room, fire suppression system, or boiler/hot water heating system, or use of water that otherwise renders the property as a premise requiring isolation as defined by State of Oregon drinking water regulations,
3. Any property for which the Utility’s personnel determine there exists a potential threat or health hazard, as defined by Oregon’s drinking water regulations.

All BPAs must pass the Utility’s inspection after installation, but before service is initiated. The Utility will not serve water to any property requiring a BPA, until such BPA has been installed and tested, and then inspected by the Utility. BPAs are to be installed as close as it is possible to the water meter.

The property owner is responsible to have the BPA annually tested and send a copy of the test report to the Utility’s office each year on or before December 31.

A customer that does not comply with the Utility’s rules and regulations regarding backflow cross connection prevention, will be disconnected according to Rule 28, Disconnection for Cause.

It is the responsibility of the property owner to contract with a plumber or other qualified individual to conduct the installation and testing in accordance with all applicable laws, rules and regulations. The Utility does not provide BPA installation or testing service.

Issue Date / Filing Date	June 13, 2019	Effective for Service on or after	July 14, 2019
Issued by Utility	Government Camp Water Company		

Government Camp Advice No. 19-1

Redline Version of Amendments to:

SCHEDULE NO. 5, MISCELLANEOUS SERVICE CHARGES

Rule 10

Rule 41

ATTACHMENT A

SCHEDULE NO. 5

MISCELLANEOUS SERVICE CHARGES

This schedule lists the miscellaneous charges included in the Utility’s Rules and Regulations; refer to the appropriate Rules for an explanation of charges and conditions under which they apply.

Connection Charge for New Service (Rule Nos. 8 & 9)

Standard ¾-inch service	At cost
Nonstandard ¾-inch service	At cost
Larger than ¾-inch	At cost
Irrigation hookup (if provided on separate system)	At cost

Main Line Extension (Rule No. 10) **At cost**

Meter Test (Rule Nos. 19 & 20)

First test within 12-month period	N/C
Second test within 12-month period	At Cost

Pressure Test (Rule No. 39)

First test within 12-month period	N/C
Second test within 12-month period	\$35 per hour

Late-Payment Charge (Rule No. 21) Pursuant to OAR 860-036-1400

Deposit for Service (Rule No. 5) Pursuant to OAR 860-036-1220

Returned-Check Charge (Rule No. 22) \$35

Trouble-Call Charge (Rule No. 35)

During normal or after office hours	\$55 per hour
Require Backhoe	\$110 per hour

Disconnection/Reconnect Charge (Rule Nos. 28 & 29)

May through September	\$50
October through April	\$64 plus cost of snow removal

Unauthorized Restoration of Service (Rule No. 30) Disconnection/Reconnection charge plus costs

Damage/Tampering Charge (Rule No. 28) **At cost**

Disconnect Site-Visit Charge (Rule No. 29) \$25

Issue Date / Filing Date	June 13, 2019	Effective for Service on or after	July 14, 2019
Issued by Utility	Government Camp Water Company		

All premises supplied with water will be served through service lines so placed as to enable the Utility to control the supply to each individual premise using a valve placed within and near the line of the street, the Utility right-of-way, or at the meter.

Rule 8: Water Service Connections (OAR 860-036-1300)

The water service connection is defined as the facilities used to connect the Utility's distribution network to the point of connection at the customer's service line. The Utility owns, operates, maintains, and replaces the service connection when necessary and promptly repairs all breaks and leaks. The customer shall not be responsible for any damage or poor service due to inadequacy of the Utility's service lines or any portion of the Utility's plumbing.

Rule 9: Service Connection Charge (OAR 860-036-1300(3))

An applicant requesting permanent water service to a premise not previously supplied with permanent service by the Utility will be required to pay the cost of the service connection, including or excluding the meter as provided in Rule No. 8 and the Utility's Miscellaneous Service Charges in this tariff.

Rule 10: Main Line Extension Policy (OAR 860-036-1310)

A main line extension is defined as the extension of the Utility's main line necessary to provide service to a customer when the property does not currently have main line frontage.

Main line extension charges, ~~if any,~~ are stated in the Utility's tariff ~~or statement of rates;~~ Schedule 5, Miscellaneous Service Charges.

Each new customer requesting a main line extension shall advance the Utility the cost-based amount necessary to extend the main line to provide the service requested.

For a period of 7 years after construction of the requested main line extension, the Utility shall also collect from any additional applicants who connect to the main line extension an amount per foot equal to the new applicant's proportionate share of the main line extension cost for that portion used. The Utility will then refund the share differential amount to those customers who previously shared the cost of said main line extension. Refunds shall not exceed the amount originally advanced.

No part of the distribution system installed prior to the request for a main line extension shall be used to calculate any customer advance or refund.

Issue Date / Filing Date	June 13, 2019	Effective for Service on or after	July 14, 2019
Issued by Utility	Government Camp Water Company		

Rule 11: Types of Use

Water service may be supplied for residential, commercial, irrigation, temporary construction, special contracts, fire prevention, and other uses. The Utility shall file separate rate schedules for each type of use and basis of supply.

Rule 12: Multiple Residences/Commercial Users

An apartment building, mobile home park, motel, trailer camp, duplex, townhouse, or any property consisting of more than one residential/commercial unit, if served through a single service line and 3/4" or 5/8" meter, shall be considered to be equivalent to the number of dwelling units when determining the customer count.

Issue Date / Filing Date	June 13, 2019	Effective for Service on or after	July 14, 2019
Issued by Utility	Government Camp Water Company		

The Utility and its customers will comply with the requirements of OAR 952-001-0010 through and including OAR 952-001-0090 (One Call Program) regarding identification and notification of underground facilities.

Rule 41: Cross Connection/Backflow Prevention Program (OAR 860-036-1680)

~~All customers must comply with the Utility's Cross Connection Control Program to protect the water system from contamination. A customer's failure to comply is grounds for disconnection under OAR 860-036-1500.~~

~~The Utility will comply with the rules and regulations for the Cross Connection/Backflow Prevention Program, as provided in ORS Chapter 333 and the Utility's approved Backflow Prevention tariff or statement of rates.~~

It is the Utility's mission with this program to provide safe and clean water to its customers and protect the water quality from potential threats and health hazards from cross connection or backflow. The Utility's Cross Connection/Backflow Prevention Program is stated in this tariff. Each service connection must be in accordance with Oregon's Drinking Water Program requirements (OAR Chap. 333, Division 61).

The following must have a BACKFLOW PREVENTION ASSEMBLY (BPA) installed by the water meter and tested on the service line:

1. Any property for which water service is classified and billed as "Commercial" pursuant to the Utility's tariffs,
2. Any property making use of a separately plumbed sprinkler system, hot tub, solar panels, dark room, fire suppression system, or boiler/hot water heating system, or use of water that otherwise renders the property as a premise requiring isolation as defined by State of Oregon drinking water regulations,
3. Any property for which the Utility's personnel determine there exists a potential threat or health hazard, as defined by Oregon's drinking water regulations.

All BPAs must pass the Utility's inspection after installation, but before service is initiated. The Utility will not serve water to any property requiring a BPA, until such BPA has been and tested, and then inspected by the Utility. BPAs are to be installed as close as it is possible to the water meter.

The property owner is responsible to have the BPA annually tested and send a copy of the test report to the Utility's office each year on or before December 31.

Issue Date / Filing Date	June 13, 2019	Effective for Service on or after	July 14, 2019
Issued by Utility	Government Camp Water Company		

A customer that does not comply with the Utility's rules and regulations regarding backflow cross connection prevention, will be disconnected according to Rule 28, Disconnection for Cause.

It is the responsibility of the property owner to contract with a plumber or other qualified individual to conduct the installation and testing in accordance with all applicable laws, rules and regulations. The Utility does not provide BPA installation or testing service.

Issue Date / Filing Date	June 13, 2019	Effective for Service on or after	July 14, 2019
Issued by Utility	Government Camp Water Company		