

ELLEN F. ROSENBLUM  
Attorney General



LISA M. UPLAND  
Deputy Attorney General

**DEPARTMENT OF JUSTICE**  
GENERAL COUNSEL DIVISION

December 29, 2023

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97308-1088  
[puc.filingcenter@puc.oregon.gov](mailto:puc.filingcenter@puc.oregon.gov)

**Re: UM 2310 Staff's Application to Defer Collection of Government Camp Water Company Rate Case Expenses**

Enclosed for filing is Oregon Public Utility Commission Staff's (Staff) Application to Defer Collection of Government Camp Water Company's Rate Cases Expenses.

A Notice of Application and copy of the Application have been sent to each person on the UW 174 service list.

Sincerely,

*/s/ Marli Klass*

Marli Klass  
Assistant Attorney General  
Business Activities Section

MK:pjr/937721910  
Enclosures

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**  
3 **UM 2310**

4 In the Matter of

5 STAFF OF THE PUBLIC UTILITY  
6 COMMISSION OF OREGON,

APPLICATION TO DEFER COLLECTION  
OF GOVERNMENT CAMP WATER  
COMPANY RATE CASE EXPENSES

7 Application to Defer Collection of  
8 Government Camp Water Company Rate Case  
Expenses.

9 Pursuant to ORS 757.259 and OAR 860-027-0300, Staff of the Public Utility  
10 Commission of Oregon (Staff) files this Application to Defer Collection of Government Camp  
11 Water Company's (Government Camp or the Company) collection of rate case expenses.

12 **I. OAR 860-027-0300(3) requirements.**

13 **A. Expense or Revenue at Issue**

14 Pursuant to Order No. 18-488 in UW 174, Government Camp agreed in stipulation to  
15 collect \$75,000 in rate case expenses to be amortized over a period of five years effective  
16 January 1, 2019.<sup>1</sup>

17 Staff requests to defer, for potential later ratemaking treatment, the further collection of  
18 Government Camp's rate case expenses for a 12-month period beginning January 1, 2024.

19 **B. Reason for Deferral**

20 Staff requests the Commission approve this Application pursuant to ORS 757.259(2)(e),  
21 which provides the Commission with discretion to defer "identifiable utility expenses or  
22 revenues, the recovery or refund of which the commission finds should be deferred in order to  
23 minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately  
24 the costs borne by and benefits received by ratepayers."

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26 <sup>1</sup> *In Re Government Camp Water Company Inc., Request for a General Rate Revision*, OPUC  
Docket No. UW 174, Commission Order No. 18-488, Dec. 21, 2018.

1 The Company requested an extension of the deadline agreed to in stipulation in UW 174  
2 for filing a new general rate case. During staff’s investigation into the validity of the request,  
3 Staff discovered that rate case amortization portion of expenses that the Company recovers in  
4 rates should expire on December 31, 2023, and represents about 10 percent of the Company’s  
5 operating expenses. Should the Company’s requested rate case filing extension be granted, the  
6 Company stands to potentially collect additional rate case amortization expenses for a full year  
7 beyond what was agreed to in Stipulation.<sup>2</sup> Hence, Staff submits this application to defer further  
8 collection of rate case expenses for later ratemaking treatment.

9 **C. Proposed Accounting**

10 Staff proposes that the deferred amounts be recorded in Account 186, Misc Deferred  
11 Debits.

12 **D. Estimate of Amounts to be Recorded in Deferred Account**

13 Staff estimates a total of \$15,000 to be recorded in the deferred account.

14 **E. Notice**

15 A copy of the Notice of Application and a list of persons served with Notice are attached  
16 to this Application as Exhibit A.

17 **II. Staff contacts.**

18 Communications regarding this Application should be addressed to:

19 Marli Klass  
20 Assistant Attorney General  
21 Oregon Department of Justice  
22 1162 Court Street NE  
23 Salem, OR 97301  
24 [marli.klass@doj.state.or.us](mailto:marli.klass@doj.state.or.us)

Russel Beitzel  
Senior Utility Analyst  
Oregon Public Utility Commission  
201 High Street SE, Suite 100  
Salem, OR 97301  
[Russel.beitzel@puc.oregon.gov](mailto:Russel.beitzel@puc.oregon.gov)

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<sup>2</sup> *Id* at 6.

1 **III. Conclusion**

2 For the reasons stated above, Staff respectfully requests that the Commission authorize  
3 the deferral of collection of Government Camp’s rate case expenses.

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5 DATED this 29<sup>th</sup> day of December, 2023.

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Respectfully submitted,

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ELLEN F. ROSENBLUM  
Attorney General

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*/s/ Marli Klass*

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Marli Klass, OSB No. 223244  
Assistant Attorney General  
Of Attorneys for Staff of the Public Utility  
Commission of Oregon

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1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**  
3 **UM 2310**

4 In the Matter of  
5 STAFF OF THE PUBLIC UTILITY  
6 COMMISSION OF OREGON,

NOTICE OF APPLICATION TO DEFER  
COLLECTION OF GOVERNMENT CAMP  
WATER COMPANY RATE CASE EXPENSES

7 Application to Defer Collection of  
8 Government Camp Water Company  
Rate Case Expenses.

9 On December 29, 2023, Staff of the Public Utility Commission of Oregon (Staff) filed an  
10 Application to Defer Collection of Government Camp Water Company’s (Government Camp or  
11 the Company) Rate Case Expenses.

12 Pursuant to Oregon Public Utility Commission Order No. 18-488 in UW 174,  
13 Government Camp agreed in stipulation to collect \$75,000 in rate case expenses to be amortized  
14 over a period of five years effective January 1, 2019. Staff files its Application in order to defer,  
15 for potential later ratemaking treatment, the difference between Government Camp’s current  
16 rates and its currently approved rates inclusive of the Company’s rate case expenses. Approval  
17 of Staff’s Application will not authorize a change in Government Camp’s rates, but will permit  
18 the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

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**UM 2310 - CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the **Notice of Application to Defer Collection of Government Camp Water Company Rate Case Expenses** to be served by electronic mail to those parties whose e-mail addresses appear on the attached service list for OPUC Docket UW 174.

DATED this 29<sup>th</sup> day of December, 2023.

*/s/ Marli Klass*

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Marli Klass, OSB No. 223244  
Assistant Attorney General  
Of Attorneys for Staff of the Public Utility  
Commission

OFFICIAL SERVICE LIST

List: **UW 174**

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