

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 UW 120

4 In the Matter of

5 CROOKED RIVER RANCH WATER
6 COMPANY

7 Request for Rate increase resulting in total
8 annual revenues of \$868,453.

STAFF RESPONSE TO RECONSIDERATION

9 INTRODUCTION

10 Staff respectfully submits this response to Crooked River Ranch Water Company's
11 (CRRWC or Company) Application for Reconsideration of PUC Order No. 08-177; Request for
12 a Hearing; and Petition for Extension of Time to Comply. On March 24, 2008, the Public Utility
13 Commission of Oregon (Commission) entered Order No. 08-181, which stayed in part Order No.
14 08-177 pending further review.

15 In Order No. 08-181, the Commission, again, ordered the Company to provide an
16 accounting of the special assessment surcharge funds, due by April 8, 2008. The reimbursement
17 of all capital funds should be distributed to members, as soon as practical, upon the receipt and
18 review of the Company's April 8, 2008 filing.¹

19 DISCUSSION

20 The Company claims that it provided a spreadsheet showing the balance of the special
21 assessment funds and that providing such information was entirely consistent with Section 5 of
22 the Order No. 07-527. This is incorrect. Staff received a spreadsheet on March 27, 2008, that is
23 titled "Assessment Monies Used in March 2008" (Attachment 1). This spreadsheet only shows
24

25 ¹ The Company's June 2007 customer list includes 1,570 customers. Once the Commission determines
26 the entire amount, it should order the money distributed pro rata to each member as soon as practicable
under the circumstances. In addition, the reimbursement of this amount to members should be separated
and distinct from the normal billing cycle.

1 monies utilized in March 2008 and does not give a complete accounting as required by the
2 Order.

3 In addition, \$30,080 of the March expenditure total was used for dump truck and back
4 hoe repairs. This is problematic for several reasons, including:

- 5 1. The back hoe and dump truck repairs are not within the scope of the
6 enabling resolution for the capital assessment fund.
- 7 2. Based on records previously provided by the Company, the back hoe
8 repair was actually accomplished in August 2007 by Cascade Machinery
9 at a price of \$16,459.96.
- 10 3. The Commission, in Order 07-527, included \$30,633 in repair expenses
11 and \$43,991 in depreciation expenses in rates. This inclusion of these
12 expenses allows for sufficient funds to make capital repairs to the
13 Company's equipment without using the capital assessment funds for
14 purposes not contained in the enabling resolution.

13 The Company has now flip-flopped and claims that it needs the assessment fund for
14 unanticipated capital expenditures. *See* CRRWC's Application at 5. In a previous declaration,
15 Mr. Rooks stated that "no new construction or capital improvements are in progress or planned at
16 the current times as the funds are not available." However, Mr. Rooks in a new declaration lists
17 certain possible capital improvement projects such as rubber bearings on Well #1, cistern leaks,
18 and possibility of major line breaks. *See* Declaration of James Rooks at 1-2. These declarations
19 are entirely inconsistent and appear to be driven by the Company's desire to retain the
20 assessments funds rather than the actual plans of the Company.

21 Furthermore, the assessment fund was not established for the type of repairs stated in Mr.
22 Rooks' declaration. As stated on numerous occasions during UW 120, the fund was established
23 for:

- 24 ■ Drilling of Well No. 3, and plumbing to accommodate a chlorination system;
- 25 ■ Upgrading the Cistern and building a new pump house;
- 26 ■ Re-plumb and add a chlorination station to Well No. 1 (formally Well No. 4);
and
- Pay-off the loan on the office building.

1 Additionally, and as already mentioned, Order No. 07-527 allowed for \$30,633 in repair
2 expenses and \$43,991 in depreciation expenses, which provide sufficient funds to make these
3 repairs, if necessary. The newly created repairs and projects contained in Mr. Rooks second
4 declaration were not, and have never been, submitted to Staff as part of a capital plan.

5 Finally, the Company, as of February 29, 2008, had an ending balance of \$100,908 in its
6 operating account; and, as of November 30, 2007, had an ending balance of \$35,492 in its
7 contingency account. These funds are more than sufficient to perform required maintenance and
8 repairs to the system.

9 The record from UW 120 demonstrates that the Company never disclosed the existence
10 of the contingency account and the certificates of deposit. Furthermore, CRRWC may have
11 failed to provide all responsive documents to the Commission's October 3, 2007, subpoena
12 duces tecum. Item #1 of the subpoena required Mr. Rooks and the CRRWC to produce:

13 Bank records concerning the capital (special assessment) fund. Bank records
14 should include all months that the special assessment fund has been in place,
15 and copies of all checks written by the Company that were processed or
16 recorded by the bank for the time period listed above. (Data requests nos. 3,
17 110, 121, 122, 124(b), and 126).²

18 Although unaware of these accounts, Staff requested additional information of other bank
19 accounts in a March 12, 2008, data request to the Company (Attachment 2). Staff requested this
20 information on possible additional accounts based upon a review of the Company's 2003 tax
21 filing that showed \$32,816 in cash and \$159,166 in savings and temporary cash investments.
22 The Company's operating account maintained a 2003 ending balance of \$47,940, indicating the
23 strong possibility of additional accounts. As of April 2, 2008, CRRWC has not responded to
24 Staff's data request. As a result, there may be other accounts that Staff is unaware of at this time.

25 ///

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28 ² The Department of Justice has spoken to the Company's attorney and sent a letter requesting
29 information on this omission by April 11, 2008 (Attachment 3).

1 The Company states that the special fund balance is \$233,889. *See* CRRWC's
2 Application at 6. The Company does not specifically state how it reached this number, but
3 includes four certificates of deposits (CDs) as an attachment to its application. The current
4 balance of the CDs is \$84,708.78. If Staff adds this amount to the balance of the contingency
5 account (\$35,492.28) and Community First Capital Assessment Account (\$118,368.01), the
6 result is \$238,569.07. However, this total amount is misleading for several reasons.

7 Although the CDs show an original issue date of November 9, 2006, there is no
8 indication if this is a renewal date for previous established CDs or if the monies were transferred
9 from other preexisting accounts. The CDs may have been established prior to the assessment
10 fund or transferred from other accounts for several reasons.

11 First, a review of the Company's operating account from the start of the assessment fund
12 in July 2004 through November 2006, does not show any transfers of funds to establish the CDs.
13 In contrast, Staff can identify the transfers from the operating account to the Community First
14 Bank in March 2005 and February 2007.

15 Second, and as previous mentioned, a review of the Company's 2003 tax statement
16 shows \$159,166 in savings and temporary cash investments. This tax statement was filed prior
17 to the establishment of the assessment fund and demonstrates that the Company already
18 maintained significant investments.

19 In addition, Staff can not identify any transfers from the operating account to establish a
20 contingency account during the capital assessment period. Because Staff is unable to follow a
21 chain of money, Staff sent a data request to the Company (Attachment 4) requesting additional
22 information concerning the accounts. For these reasons, Staff believes that inclusion of CD and
23 contingency accounts as part of the assessment funds may not be accurate.³

24 The Company may try to present an argument that a portion of funds in the operating
25 account are capital assessment funds that have not yet been transferred to the capital assessment

26 _____

³ Early redemption of the four CD accounts would result in approximately \$943.27 in forfeitures.

1 account. This argument would need to be based on the fact that the operating account has grown
2 by approximately \$42,800 since the establishment of the assessment charge. However, because
3 of the fact that the Company has not made a transfer to the Community First Bank since
4 February 2007, there is no established trend of making assessment fund transfers in a timely
5 manner. As a result, there is no reason to believe that the Company intends to transfer this
6 amount to the capital account. However, even in this scenario, the total maximum assessment
7 funds available are \$161,168 (\$42,800 plus \$118,368).

8 Considering that the Company collected \$476,682 in assessments and spent
9 approximately \$131,081 for its intended purpose of the assessment fund, the capital assessment
10 account should have \$345,602, and not \$118,368, as shown in the February 29, 2008,
11 Community First statement.

12 It is important to note that Staff, in its March 7, 2008, report states on page 5 that
13 (emphasis added):

14 If the Company properly only used the capital assessment fund for the Board
15 intended purposes, the balance would have been \$345,602 as of November
16 30, 2007. **This indicates that the Company has not implemented proper
17 controls surrounding this capital assessment fund and appears to be
18 using the capital assessment fund as an extension to its operating
19 account.** This is in violation of the Company's Board Resolution, dated
20 March 29, 2004.⁴

18 Although Staff believes that the Board has not implemented proper controls around the
19 assessment fund, no withdrawals from Community First account have recently occurred to
20 Staff's knowledge.

21 Based upon the information outlined above, Staff believes that the Commission should
22 not extend the stay any longer than necessary after April 8, 2008. The pro rata reimbursement to
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25 ⁴ Staff's report dated March 2007, contained a matching error concerning the total amount collected
26 (\$476,682) and the Difference (funds not accounted for - \$140,881 – based on the November 2007
Community First balance). When the December 2007 assessment collection is added to the Difference,
the difference is actually \$151,795.

1 members does not need to be tied to the monthly bills of customers. The Company can, and
2 should, send this reimbursement to members as a separate mailing.

3 Recent correspondence (Attachment 5) continues to suggest that CRRWC is posturing in
4 a way to show “an unwillingness or incapacity or refusal to effectively operate and manage the
5 water system to provide safe and adequate service to its customers in compliance with Oregon
6 statutes.” See OAR 860-036-0365. As demonstrated in this response, the Company has more
7 than sufficient cash on hand and current rates are sufficient to allow the Company to operate in a
8 prudent and responsible manner.

9 **CONCLUSION**

10 The Commission should order the Company to distribute the assessment fund balances
11 pro rata to each member, as soon as practical, after April 8, 2008.

12 DATED this 4th day of April 2008.

13 Respectfully submitted,

14 HARDY MYERS
15 Attorney General

16 s/ Jason W. Jones
17 Jason W. Jones, #00059
18 Assistant Attorney General
19 Of Attorneys for the Public Utility Commission
20 of Oregon

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ASSESSMENT MONIES USED IN MARCH 2008

BUILDING (PAYMENT TOWARDS PAYOFF)
REPAIRS DUMP TRUCK
REPAIRS BACK HOE

\$	27,533.00
\$	11,473.00
\$	18,607.00

\$ 57,613.00



Oregon

Theodore R. Kulongoski, Governor

RECEIVED

MAR 12 2008

Department of Justice
General Counsel-Salem

Public Utility Commission
550 Capitol Street NE, Suite 215
Mailing Address: PO Box 2148
Salem, OR 97308-2148
Consumer Services
1-800-522-2404
Local: 503-378-6600
Administrative Services
503-373-7394

March 12, 2008

J. R. ROOKS
CROOKED RIVER RANCH WATER COMPANY
PO BOX 2319
TERREBONNE, OREGON 97760

RE:	<u>Docket No.</u>	<u>Staff Request No.</u>	<u>Response Due By</u>
	UW 120	DR 147 - 149	March 27, 2008

Please provide responses to the following request for information. Contact the undersigned before the response due date noted above if the request is unclear or if you need more time.

147. Besides the Community First Bank (Capital) Account and the Washington Mutual (Operating) Account does CRRWC maintain any other bank and investments accounts including Certificates of Deposits, Money Market accounts, Checking, Mutual Funds, other? Please explain.
148. If the Company maintains other bank and investment accounts, please provide statements of such accounts from May 2006 through February 2008.
149. Please provide specific details of any deposits, transfers, and withdrawals from these accounts.

Please provide an original and one complete copy of your response to the attention of Vikie Bailey-Goggins, PO Box 2148 or 550 Capitol St NE Ste 215, Salem, OR 97308-2148; (puc.datarequests@state.or.us) and one complete copy to the attention of counsel for PUC Staff, Jason W. Jones, Department of Justice, 1162 Court St NE, Salem, OR 97301-4096 (jason.w.jones@state.or.us).

Michael Dougherty
Program Manager
Corporate Analysis and Water Regulation
(503) 378-3623

cc: Service List

Attachment 2
Page 1 of 1

HARDY MYERS
Attorney General



PETER D. SHEPHERD
Deputy Attorney General

DEPARTMENT OF JUSTICE
CIVIL ENFORCEMENT DIVISION

file copy

March 28, 2008

Tim Gassner
Glenn, Sites, Reeder & Gassner, LLP
Attorneys at Law
205 S.W. Fifth Street
Madras, OR 97741

Sent via facsimile & regular mail
Fax: (541) 475-3944

Re: *Public Utility Commission v. Rooks & Crooked River Ranch Water Company*
Jefferson County Circuit Court Case No. CV07-0150

Dear Mr. Gassner:

I am sending this letter as a follow up to our conversation this morning. As we discussed, it has come to my attention that Mr. Rooks and the Crooked River Ranch Water Company (CRRWC) may have failed to provide all responsive documents to the PUC's October 3, 2007 subpoena duces tecum. Item #1 of the subpoena required Mr. Rooks and the CRRWC to produce:

Bank records concerning the capital (special assessment) fund.
Bank records should include all months that the special assessment fund has been in place, and copies of all checks written by the Company that were processed or recorded by the bank for the time period listed above.

In addition, the Court Order entered after the December 13, 2007 show cause hearing required Mr. Rooks and the CRRWC to produce all responsive documents to Item 1 of the subpoena for the period of time from June 2004 through November 20, 2006.

I became aware that Mr. Rooks and the CRRWC may have failed to produce all documents required by the 10/3/07 subpoena and Court Order after Mr. Rooks submitted his March 26, 2008 declaration to the PUC. In it, he stated that the special assessment fund contains \$233,889. He further stated that the CRRWC has a portion of the capital fund assessment in certificates of deposit and attached four documents to his declaration. These attachments appear to relate to four separate certificates of deposit that were issued on November 9, 2006.

Unfortunately, the PUC has not been provided with all bank records concerning these certificates of deposit as required by Item 1 of the 10/3/07 subpoena and the Court Order. In addition, it appears that some special assessment funds may be deposited with Washington

Attachment 3
Page 1 of 2

Tim Gassner
March 28, 2008
Page 2

Mutual or in another account. It appears that the PUC has not been provided with documents relating to this other account. If Mr. Rooks and the CRRWC failed to produce documents covered by Item 1 of the subpoena, they are in violation of the subpoena and the Court Order requiring such production.

In our conversation today, you said that you were going to speak with your client about this matter and that you would call me back. When we discuss this matter again, I will want to know:

1. What documents have not yet been produced by Mr. Rooks and the CRRWC.
2. Why such documents have not been produced.
3. When the PUC will receive such documents.

I hope that we can quickly resolve this matter without having to go back to the court. Until we have resolved this matter, I will not sign the Judgment of Dismissal. In addition, I shall be forced to seek the Court's assistance if we have not resolved this matter by April 11, 2008. I look forward to talking to you. Thank you.

Sincerely,



Michael W. Grant
Assistant Attorney General

MWG:mad\CEDW4465

March 27, 2008

J. R. ROOKS
CROOKED RIVER RANCH WATER COMPANY
PO BOX 2319
TERREBONNE, OREGON 97760

RE:	<u>Docket No.</u>	<u>Staff Request No.</u>	<u>Response Due By</u>
	UW 120	DR 150 - 156	April 11, 2008

Please provide responses to the following request for information. Contact the undersigned before the response due date noted above if the request is unclear or if you need more time.

150. Concerning the Certificate of Deposits:

a. If these Certificates of Deposits are part of the assessment fund balance, please explain why these accounts were not provided in data request responses and in response to the subpoena request:

1. *Bank records concerning the capital (special assessment) fund. Bank records should include all months that the special assessment fund has been in place, and copies of all checks written by the Company that were processed or recorded by the bank for the time period listed above. (Data requests nos. 3, 110, 121, 122, 124(b), and 126).*

- b. When were these CD accounts originally established?
- c. Please include the CRRWC check numbers that established these accounts. Please provide copies of the processed checks.
- d. Was November 2006 the original date these CD's were established or is November 2006 a renewal date on previous established accounts? Please explain. Please provide all statements since establishment of the accounts.

151. Please provide copies of the following checks (3344, 3346, 3583, 3806) made to CRRWC that were not cashed as of July 2006 operating account statement and show as a \$0.00 deposit in the August 2006 statement?

152. What was the purpose of writing checks to CRRWC off the operating account and not cashing these checks? Please explain.

Attachment 4
Page 1 of 3

153. Please explain why the capital assessment funds were used for dump truck repairs and back hoe repairs when the enabling resolution specifically stated that the funds would be use for:

- Drilling of Well No. 3, and plumbing to accommodate a chlorination system;
- Upgrading the Cistern and building a new pump house;
- Re-plumb and add a chlorination station to Well No. 1 (formally Well No. 4); and
- Pay-off the loan on the office building.

154. Please provide the applicable Board of Director resolutions that authorized this fund to be used for:

- Back hoe repairs;
- Dump truck repairs;
- Legal costs concerning the Commission assertion of jurisdiction of CRRWC in WJ 8;
- Accounting costs related to WJ 8, UW 120, a civil complaint, standard financial reporting, and other Commission regulatory matters;
- UW 120 legal costs concerning contributions in aid of construction;
- \$30,000 for land that was actually purchased in 2001 prior to the establishment of the capital assessment fund; and
- \$13,500 for a crane that was actually purchased in 2002 prior to the establishment of the capital assessment fund.

155. Concerning the Contingency Account:

- a. When was the Contingency Account established?
- b. Please include the CRRWC check numbers that established this account. Please provide copies of the processed checks.

156. Please provide the December 1, 2007 customer list.

CRRWC
Data Requests 150 - 156
March 27, 2008
Page 3

Please provide an original and one complete copy of your response to the attention of Vikie Bailey-Goggins, PO Box 2148 or 550 Capitol St NE Ste 215, Salem, OR 97308-2148; (puc.datarequests@state.or.us) and one complete copy to the attention of counsel for PUC Staff, Jason W. Jones, Department of Justice, 1162 Court St NE, Salem, OR 97301-4096 (jason.w.jones@state.or.us).

Michael Dougherty
Program Manager
Corporate Analysis and Water Regulation
(503) 378-3623

cc: Service List

Date: March 26, 2008
To: CRRWC Members
From: CRRWC Board of Directors
Subject: Public Utility Commission Update

Many of you have heard on the radio or television, or read in the newspaper, statements made by the PUC and their representatives which are not correct. The biggest misrepresentation has been that CRRWC has misappropriated \$118,000. Many of the media reports are inaccurate and misrepresent the contents of the PUC's order. If you would like to read the order itself, you can access it through the PUC website at <http://apps.puc.state.or.us/edockets/>, order number 08-177. The management and Board of Directors of Crooked River Ranch Water Co-op state to you now that there are no funds missing or unaccounted for in this company.

As you may know, in 2006 and 2007, petitions were collected by the Water Watch Dogs and submitted to the PUC requesting that they assert jurisdiction over your water company. After their first failed attempt to assert jurisdiction over CRRWC in 2001 the PUC sponsored legislation which became Oregon Revised Statute (ORS) 757.063. This is the law that provides for the PUC to intervene when 20% of a recognized association petitions for regulation. CRRWC has challenged the constitutionality of a law which allows an unrepresentative minority to take action on behalf of the majority as contrary to the fundamental democratic principles of this country.

When Chairman of the Public Utility Commission, Lee Beyer sponsored this new law before the legislature in Salem he said "If 20% of the associations' members say that or - petition us and say that we would like you to regulate our association, then it gives the PUC the right to come in and determine whether there is a need to do that or not. And, that is simply all it does. It provides us the opportunity to do that." After the legislature passed the Bill which became ORS 757.063 and petitions for regulation were submitted to the PUC the PUC started regulating CRRWC as soon as those petitions were received. This action by the PUC Staff was upheld by the PUC Board of Commissioners when challenged. In an order signed by Lee Beyer the PUC said "...we agree with Staff that ORS 757.063 confers jurisdiction upon Commission receipt and verification of signatures from 20 percent of a water association's members." "Furthermore, because jurisdiction presumptively attached at that time, CRRWC became a regulated utility subject to the laws

administered by the Commission." Commissioner Beyer told the legislature one thing about the effect of the new law and then enforced a completely different interpretation. CRRWC has challenged this fraud which was perpetrated on our legislature through an appeal to the Court of Appeals in Salem, Oregon.

The fraud in the procurement of the law that allowed the PUC to regulate CRRWC is not the only illegal act perpetrated by the PUC against your water company. Actions by the Public Utility Commission are regulated by the Oregon Administrative Procedures Act. The Oregon Administrative Procedures Act is set out in laws known as Oregon Administrative Rules (OAR's). The PUC violated these OAR's when they asserted jurisdiction over CRRWC. This issue is also on Appeal to the Oregon Court of Appeals in Salem however we are still waiting for that case to be decided.

While the Court of Appeals considers whether or not the actions of the PUC were legal CRRWC remains under their oversight. Because of the PUC oversight a proceeding was started to establish rates necessary for the operation of your company. The PUC handpicked an Administrative Law Judge to conduct this proceeding. When the Judge disregarded information submitted by CRRWC an investigation revealed that the person the PUC picked was not a licensed attorney in the State of Oregon in violation of ORS 9.160. The Oregon State Bar started an investigation against this man for the un-authorized practice of law a crime punishable by up to a fine of \$500 or imprisonment in the county jail for a period not to exceed six months, or both. The Oregon State Bar investigator first found that the Judge had committed the un-authorized practice of law but later changed his position without explanation, likely under heavy political pressure.

The proceeding to establish rates went on with the PUC's Judge in charge and CRRWC submitted the initial rate request. The rate request was prepared with the assistance of the company's accounting firm who is experienced in these types of submissions to the PUC. The rate request contained a proposal for rates that would allow the company to continue with its maintenance program and perform necessary upgrades. The PUC responded with a budget that would not allow CRRWC to maintain the integrity of the existing water system let alone make any improvements.

The Board of Directors and management have made adjustments in order to try to continue operations with the budget required by the PUC. Almost all overtime has been eliminated for all staff, no major repairs have been undertaken, all upgrades have been cancelled due to lack of funds, and the

equipment repairs have been cut. Even with these cuts, the company is now operating in the red. The PUC reduced rates but at the cost of the integrity of your water system. Under the current PUC imposed budget it is only a matter of time before the integrity of the system and the service provided will be compromised.

In recognition of the fact that the Court of Appeals will likely overturn their order asserting jurisdiction the PUC is claiming non-compliance with its existing order and trying to impose fines against the CRRWC Board of Directors in order to appoint it's own representative to run CRRWC and eliminate the current Board and Management. With PUC people running the company the Appeal to the Court of Appeals will simply be dropped and the PUC will not be held accountable for their actions. The fact is that even though the law is not a fair one it is still the law until overturned by the Court of Appeals. CRRWC has abided by the law despite the claims of the PUC and their hand picked and non-licensed Judge. When certain issues in this case were brought before a Circuit Court Judge in Jefferson County CRRWC has obtained favorable rulings unfortunately due to legal processes not every action of the PUC can be appealed to the Circuit Court.

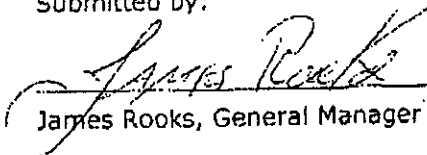
The PUC has demonstrated that it will stop at nothing to expand it's bureaucracy. The CRRWC Board of Directors and Management will continue to oppose regulation by the PUC when it is achieved through unethical and in some cases illegal means. Ask yourself this question:

Do you have clean, abundant water with adequate pressure at your house? If your answer is "yes", please pick up the phone and call the PUC and tell them to leave your water company alone! The Commissioner's phone number is

503-378-6611

The CRRWC Board of Director's and Management will continue to work hard to provide quality water service despite the interference by the PUC.

Submitted by:


James Rooks, General Manager

1 **CERTIFICATE OF SERVICE**

2
3 I certify that on April 4, 2008, I served the foregoing upon all parties of record in this
4 proceeding by delivering a copy by electronic mail and by mailing a true and exact copy by
5 postage prepaid first class mail or by hand delivery/shuttle mail.

6 STEVEN COOK
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14 CRAIG SOULE
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18 **CROOKED RIVER RANCH WATER CO**
19 BRIAN ELLIOTT
20 PRESIDENT, BOARD OF DIRECTORS
21 PMP 313 - 1604 S HWY 97 #2
22 REDMOND OR 97756

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18 

19 Neoma Lane
20 Legal Secretary
21 Department of Justice
22 Regulated Utility & Business Section