

September 14, 2021

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

Re: WA-83 – In the Matter of Sunriver Water LLC, Expanded Service Territory Application – Public Comment Response

Administrative Law Judge Allwein:

Intervenor Pine Forest Development LLC submits this letter is in response to the comments filed by Robert Gamble on September 8, 2021. This letter responds only to those issues that are directed towards Pine Forest Development, LLC.

Under “Number 1” Mr. Gamble asks why there is a discrepancy between the territory expansion application and the water services agreement. In 2015, when the Caldera Springs Expansion was first proposed and the water services agreement signed, the developer sought approval for 395 residential units plus an undetermined number of overnight lodging units (“OLUs”). The OLU’s fall within the general category of “commercial uses” under the agreement. The number of OLU’s was not specified in the Water Services Agreement. The 2018 revision to the resort plan reduced the number of residential units to 340 and specifically included a maximum of 150 OLU’s. The OLU’s are designed to include a single-family residence together with an auxiliary dwelling unit as a single water company customer. Consequently, the resort will include 340 single-family residence customers and 75 OLU customers (each with two OLU units), for a total of 415 new customers.

Mr. Gamble also questions why the water services agreement requires that water for irrigation and dust control should be potable. The agreement does not impose any such requirement. Section 3.G.4 of the agreement provides that all “water provided pursuant to this Agreement for domestic and commercial use shall be potable[.]” Dust control and irrigation do not fall within commercial or domestic uses.

Under “Number 6” Mr. Gamble asserts that Pine Forest Development, LLC is attempting to sell the 614-acre expansion area, that the expanded resort will be a “separate resort” and therefore fail to comply with certain conditions of approval. Mr. Gamble is mistaken. As clearly stated in the body of the MLS information which Mr. Gamble cites, the developer of the resort is currently accepting reservations for lots within the expansion area. Under applicable Multiple Listing Service (“MLS”) rules, upon initiation of the reservation program the developer was required to create a “parent listing” for the subdivision.

September 14, 2021

Page 2

The 614-acre property is not for sale and the developer has no intention of either selling the property or creating a separate resort. The resort is in no danger of failing to comply with conditions of approval.

Thank you for your consideration of these comments.

Very truly yours,



Steven P. Hultberg

cc: PUC Distribution List