

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 UW 111

4 In the Matter of
5 RL Water LLC
6 Request for a general revenue requirement
7 Increase in the amount of \$106,143, or 376%

MOTION TO FURTHER SUSPEND NEW
RATES UP TO AN ADDITIONAL THREE
MONTHS AND REVISE THE PROCEDURAL
SCHEDULE

8
9 Staff respectfully moves, pursuant to ORS 757.215(1), to further suspend the new rates
10 up to an additional three months and revise the remaining procedural schedule in this docket.

11 Staff understands that RL Water LLC does not oppose this request. On February 22, 2006, Staff
12 met with counsel for RL Water LLC to discuss RL Water LLC's failure to provide data
13 responses that were, and are currently, late. On February 27, 2006, RL Water LLC filed a
14 motion to extend the data response due date for Staff data request number 3 by 30 days.¹

15 Under the current schedule, Staff will not have sufficient time to analyze or follow up on
16 RL Water LLC's late data responses within the existing schedule and suspension period. Staff
17 understands from its meeting with counsel for RL Water LLC that it now is represented and
18 would like the opportunity to respond to Staff's data responses in a meaningful manner, but that
19 it will need additional time to do so. Because RL Water LLC is now represented and has stated
20 its willingness to respond to Staff data requests in a meaningful manner, Staff supports allowing
21 an extension of time for RL Water LLC to respond. However, this extension requires that the
22 existing suspension period be extended by up to another three months and the existing procedural
23 schedule be revised. Therefore, Staff respectfully requests an order extending the suspension
24 period by up to three months and that the remaining schedule be revised as follows:

25 ///

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¹ Staff notes that Staff data requests number 1 and 2 are also outstanding and late.

1	Settlement Conference ² :	May 4, 2006 ³
2		Klamath Falls
3	Deadline for Data Requests to Company:	May 5, 2006
4	Deadline for Company Responses to Data	May 15, 2006
5	Requests:	
6	Staff and Intervenor Direct Testimony Due:	May 26, 2006
7	Evidentiary Hearing	June 8, 2006 ⁴
8		Klamath Falls

9 For the foregoing reasons, Staff requests that the suspension period be extended an
10 additional three months and the procedural schedule be revised as described above.

11 DATED this 14th day of March 2006.

12
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 Public Utility Commission of
20 Oregon

21
22
23
24 _____
25 ² Staff understands that it, and not Administrative Hearings, schedules settlement conferences. This date is provided
for general information and to give context to the overall proposed schedule.

26 ³ Staff notes this is its best estimate of the settlement conference, but that the date may change.

⁴ Again, Staff includes this date as a possible hearing date, but that the parties' schedule, including the ALJ's, may demand an alternative date.

1 **CERTIFICATE OF SERVICE**

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3 I certify that on March 14, 2006, I served the foregoing upon the parties hereto by
4 electronic mail and sending a true, exact and full copy, postage prepaid, by regular mail, or by
5 shuttle mail/hand delivery to:

6 **RL WATER LLC**
7 CAROL LIN
8 OWNER
9 23425 SE 17TH PL
10 SAMMAMISH OR 98075
11 rlwater@gmail.com

12 **PUBLIC UTILITY COMMISSION**
13 KATHY MILLER
14 550 NE CAPITOL ST STE 215
15 SALEM OR 97301-2551
16 kathy.miller@state.or.us

17 **RL WATER LLC**
18 CHRIS & TERRI SHOCKEY
19 MGR - OREGON
20 4000 ROUND LAKE RD # 84
21 KLAMATH FALLS OR 97601
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25
26
Neoma Lane _____
Neoma Lane
Legal Secretary
Department of Justice
Regulated Utility & Business Section