

1 0070(3), Soule has conferred with CRRWC concerning the subject data requests. The
2 parties are unable to informally resolve the dispute.

3 Pursuant to OAR 860-014-0070(3), Soule files this motion to compel production of the
4 information/documentation requested and respectfully requests a ruling or order
5 requiring CRRWC to provide full and complete answers or documentation to the subject
6 data requests. Since the time for these responses has already passed, Soule also
7 requests that CRRWC be ordered to provide these full and complete responses or
8 documentation in a timely fashion.

10 DISCUSSION

11 Data Request 67

12 In response to data request 67 CRRWC stated the following:

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14 *"Request 67 is argumentative and CRRWC objects to the inquiry on that basis".*

15 Data Request 67 asks for a clarification of financial information provided by CRRWC
16 that is conflicting. The subject data request concerning conflicting financial information
17 for equipment repairs is relevant to the rate/tariff setting process and CRRWC should be
18 compelled to provide this information.

20 Data Request 68 Through 73

21 In response to data requests 68 through 73 CRRWC indicated the following:

22
23 *CRRWC objects to DR 68 through 73 as not relevant to the establishment of*
24 *rates.*

25 The legitimacy of an individual's presence on Board of Directors and therefore the
26 individual's ability to make decisions concerning the finances of the CRRWC is clearly

1 relevant to the financial condition of the Company and its rates and services given that
2 CRRWC's By-laws, as amended 9/24/04 states the following:

3 *The Board shall have general supervision and control over and shall manage and*
4 *conduct the affairs and business of the Corporation, and shall make all*
5 *necessary rules and regulations, not inconsistent with law or with the Bylaws or*
6 *Articles of Incorporation, for the management of the Corporation and the*
7 *guidance of the officers, employees and agents of the Corporation.*
8

9 Also, CRRWC expending funds for legal representation of individual members of the
10 Board of Directors is relevant to the financial condition of the Company and its rates and
11 services.

12 The subject data requests concerning the legitimacy of individual members of the Board
13 of Director's of CRRWC and funds expended by CRRWC for the individual
14 representation of the board members is relevant to the rate/tariff setting process and
15 CRRWC should be compelled to provide this information.
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17 **Data Request 74**

18 In response to data request 74, CRRWC stated the following:

19 *"CRRWC objects based on OAR 860-014-0070(2)."*
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21 CRRWC's objection to the subject data request is curious in that OAR 860-014-0070(2)
22 specifically allows a party to file a written request for a copy of a specific response to
23 another party's data request. The subject data request asks for copies of the responses
24 to the PUC's DR 140(a), 140(b), 140(c), 141(a), 141(b), 142(a), 142(b), 143(b), 143(d),
25 143(e), 143(g), 145, 146, 147, 148, 149, 150(a), 150(b), 150(c), 150(d), 151, 152, 153,
26 154, 155(a), 155(b), 156, 157 and 158. The subject data request is supported by OAR

1 860-014-0070(2) and CRRWC should be compelled to provide the information.

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CONCLUSION

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4 For the foregoing reasons, Intervenor – Craig Soule requests that CRRWC be
5 compelled to produce the information/documentation discussed herein.

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8 DATED this 18th day of June 2008.

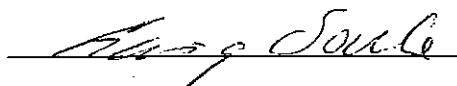
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Respectfully submitted,

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Intervenor Craig Soule

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CERTIFICATE OF SERVICE UW 120

I certify that on June 18, 2008 I served a true and correct copy of the foregoing "Motion to Compel Data Request 67 to 74" on all parties of record in this proceeding by placing in the US Mail with postage prepaid and by delivering a copy by electronic mail to:

CHARLES G NICHOLS
POB 1594
Redmond, Oregon 97756
charlien@blazerind.com

STEVEN COOK
POB 1111
Terrebonne, Oregon 97760
sewfab4u@hotmail.com

OREGON DEPARTMENT OF JUSTICE
JASON W. JONES - ASSISTANT AG
1162 Court Street NE
Salem Oregon 97301-4096
jason.w.jones@state.or.us

GLENN, SITES, REEDER & GASSNER, LLP
TIMOTHY GASSNER
205 SE 5th Street
Madras Oregon 97741
timgassner@gmail.com

CROOKED RIVER RANCH WATER CO.
JAMES ROOKS - GENERAL MANAGER
POB 2319
Terrebonne, Oregon 97760
jr@crrwc.com

HARRANG LONG GARY RUDNICK PC
JONA MAUKONEN
1001 SW Fifth Ave, 16th Floor
Portland Oregon 97204
jona.maukonen@harrang.com

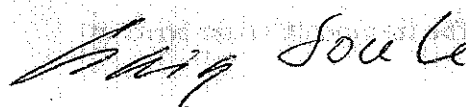
OR PUBLIC UTILITY COMMISSION
MICHAEL DOUGHERTY
550 Capitol Street NE Suite 215
Salem Oregon 97301
michael.dougherty@state.or.us

HARRANG LONG GARY RUDNICK PC
C. ROBERT STERINGER
1001 SW Fifth Ave, 16th Floor
Portland Oregon 97204
bob.steringer@harrang.com

&

I certify that on June 18, 2008 I served the following entity, by placing in the US Mail with postage prepaid, a true and correct copy of the foregoing "Motion to Compel Data Request 67 to 74":

CROOKED RIVER RANCH WATER COMPANY
BRIAN ELLIOT - PRESIDENT BOARD OF DIRECTORS
PMP 313 - 1604 S Hwy 97 # 2
Redmond, Oregon 97756



CRAIG SOULE