1	<b>BEFORE THE PUBLIC UTILITY COMMISSION</b>		
2	OF OREGON		
3	UW 174		
4 5 6	In the Matter of GOVERNMENT CAMP WATER COMPANY, INC.,	JOINT MOTION TO AMEND PROCEDURAL SCHEDULE AND EXTEND TARIFF SUSPENSION PERIOD	
7	Request for a General Rate Revision.	Expedited Consideration Requested	
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Government Camp Water Company, Inc. (Government Camp or Company) and Staff of

the Public Utility Commission of Oregon (Staff) hereby respectfully request that the Public Utility 10 Commission of Oregon (Commission) issue an order modifying the procedural schedule in this 11 docket and further extending the tariff suspension period. As the current procedural schedule's due 12 date for the Company's next round of testimony is this Thursday, May 24, 2018, the Company and 13 Staff respectfully request expedited consideration of this motion under OAR 860-001-0420(6). 14 The Company filed this request for a general rate increase on December 29, 2017, to be 15 effective January 31, 2018. The Commission issued an order finding cause to investigate the filing 16 and suspending the rate filing for nine months, which expires October 31, 2018. On February 26, 17 2018, the Commission held a public comment hearing and a prehearing conference in Government 18 19 Camp, Oregon. ALJ Power issued a procedural schedule to which the parties had agreed. Since that date, the parties have diligently proceeded with discovery and engaged in settlement 20 21 negotiation. On May 3, 2018, as required by the procedural schedule, Staff filed direct testimony. In the course of discovery and developing testimony in this case, Staff identified several 22 transactions for which the Company needs the Commission's approval under ORS 757.480 and 23 ORS 757.495. These transactions include: (1) the 2014 transfer of the company to a new owner, 24 which occurred without Commission consideration or approval under ORS 757.480; (2) an 25 26 affiliated interest lease for office space; (3) an affiliated interest lease for storage space; and (4) an

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affiliated interest agreement pertaining to the purported new owner's salary.<sup>1</sup> The Company and 1 Staff agree that the Company will make these four additional filings by June 5, 2018.<sup>2</sup> 2

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To enable the redirection of Company resources to preparing these filings and responding to discovery regarding the new filings, the Company requested a revised procedural schedule and a 4 further extension to the suspension period. These changes will enable the Commission to consider 5 and make a decision regarding these transactions before considering and making a decision 6 regarding this rate case. This order of events is desirable because all of the above transactions may 7

have a significant effect on the inputs to and outcome of the rate case. Staff agrees the requested 8

changes will provide for the most efficient and orderly resolution of this case and the additional 9

10 filings, and additionally will provide the Commission with the most adequate record for decision in

all of these matters. Staff therefore joins the Company's request. 11

Further extension of the suspension period beyond the initial nine months provided for in 12 ORS 757.215 will not harm ratepayers in this case. While Staff's direct testimony recommended a 13 small revenue decrease, that same testimony also noted that Staff's recommendations may change 14 to reflect updated figures for the affiliated interest agreements, if and when they are approved by 15 the Commission.<sup>3</sup> The Company and Staff agree that the overall result of these changes will most 16 likely result in a revenue increase. Granting the Company's request for an extension to the 17 suspension period therefore will accrue to the ratepayers' benefit by delaying the rate increase that 18

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21 <sup>1</sup> See In re Pete's Mountain Water Company, Inc., OPUC Docket No. UW 117, Order No. 06-657 (Dec. 4, 2006) ("[W]e agree [the water utility] must file affiliated interest contracts under 22 ORS 757.495 for the wages and salaries paid to [owner-operators] before we can complete our

review of the requested rate increase."). 23

<sup>2</sup> On March 30, 2018, the Company filed for approval of two of the affiliated interest agreements in Docket Nos. UI 398 and UI 399. These filings inadvertently failed to include the affiliate's 24 cost information required by Section G of the form, which is necessary to enable the

25 Commission to apply the lower of cost or market standard under OAR 860-036-2230(e). The Company agrees that it will withdraw UI 398 and UI 399 and refile applications for these

agreements including affiliate cost information by June 5, 2018. 26

<sup>3</sup> Exhibit Staff/100, Brock/3, Brock/5-6, Brock/26, Brock/28-29 (filed May 3, 2018).

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may result from this case. Extending the suspension period of a rate case with the affected
company's agreement is consistent with ORS 747.215(2) and past Commission practice.<sup>4</sup>
The Company and Staff have agreed to the below revised schedule:

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5	UW 174: Agreed Revised Schedule		
6	Activity	Date	
	Affiliated Interest / Transfer Applications Due	June 5, 2018	
7	Staff Presents Affiliated Interest / Transfer	August 28, 2018	
8	Applications to Commission at Public Meeting		
9	Replacement Staff Direct Testimony Due <sup>5</sup>	September 7, 2018	
10	Settlement Conference	September 18, 2018	
11	Company Reply Testimony <sup>6</sup>	September 28, 2018	
12	Staff Rebuttal Testimony	October 19, 2018	
13	Company Surrebuttal Testimony	November 9, 2018	
14	Cross Examination Statements and Exhibits	November 28, 2018	
15	Evidentiary Hearing	December 11, 2018	
	Simultaneous Opening Briefs	January 4, 2019	
16	Simultaneous Reply Briefs	January 25, 2019	
17	Target Date for Commission Decision	March 22, 2019	
18	New Suspension Expiration Date	March 31, 2019	

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20 Due to the impending due date for the Company's testimony on May 24, 2018, under the

21 current procedural schedule, and the need to redirect resources to the additional necessary filings,

22 the Company and Staff respectfully request expedited consideration of this motion under OAR

23 860-001-0420(6). No other parties have intervened in this case, and all parties to the case join this

26 respective testimony and to develop the most appropriate record for the Commission in this case.

<sup>6</sup> The parties agree to a seven calendar-day discovery turnaround time following this date.

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<sup>&</sup>lt;sup>24</sup> *see* Order No. 06-657, at 3-4 (citing ORS 747.215(2)).

<sup>&</sup>lt;sup>5</sup> The parties agree that on this date, Staff may file testimony replacing its direct testimony filed on May 3, 2018. This will enable both Staff and the Company to more efficiently scope their

motion. Because further extension of the tariff suspension period would accrue to the benefit of
ratepayers, the Company and Staff agree that no time for response is necessary for this motion.

3	and and	
4	DATED this day of May, 2018	
5		Respectfully submitted,
6		ELLEN F. ROSENBLUM Attorney General
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8		profile
9		Elizabeth Uzelac, ØSB # 170507 Assistant Attorney General
10		Of Attorneys for Staff of the Public Utility Commission of Oregon
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12		Laura A. Schroeder, OSB # 873392 Wyatt Rolfe, OSB # 064926
13		Schroeder Law Offices, P.C. Counsel for Government Camp Water, Inc.
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