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April 23, 2024

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Public Utility Commission of Oregon
ATTN:Filing Center
201 High Street SE, Suite 100
Salem, OR 97308-1088

Re: UW 174 - Staff's Motion to Modify Commission Order No. 18-488

Enclosed for filing is Oregon Public Utility Commission Staff's (Staff) Motion to Modify Commission Order No. 18-488.

Sincerely,

/s/ Marli Klass

Marli Klass
Assistant Attorney General
Business Activities Section

MK6:pjr/958752345
Enclosures

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

3 UW 174

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5 In the Matter of
6 GOVERNMENT CAMP WATER
COMPANY, INC.,
7 Request for a General Rate Revision.

MOTION TO MODIFY
ORDER NO. 18-488

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9 **INTRODUCTION**

10 The Public Utility Commission of Oregon’s Staff (Staff), consistent with ORS 756.568,
11 respectfully requests that the Public Utility Commission of Oregon (Commission) amend Order
12 No. 18-488.¹ Order No. 18-488 required that Government Camp Water Company, Inc.
13 (Government Camp or Company) file a new rate case on or before June 1, 2024.² Staff now
14 request that the Commission allow a one-time modification of this Order to extend the rate case
15 deadline so that the Company may file a rate case on or before December 31, 2024. This
16 extension would allow the Company to develop and file a thorough and comprehensive rate case.

17 **BACKGROUND**

18 In September of 2023, Staff received a request from the Company regarding obtaining an
19 extension to file its 2024 rate case as outlined in Order No. 18-488. The Company let Staff know
20 that it is unable to develop and file a new rate case on or by June 2024 due to the first two
21 quarters of the year being extremely busy for the Company. In an email dated March 7, 2024,
22 the Company further elaborated on its distinctive situation to Staff, pointing out reasons
23 contributing to its inability to file a new rate case on or before June 1, 2024, including: 1. Heavy
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25 ¹ *In re Government Camp Water Company Inc., Request for a General Rate Revision*, OPUC
Docket No. UW 174, Commission Order o. 18-488, Dec. 21, 2018.

26 ² *Id.* at 4.

1 snow in its service territory resulting in limitations to the Company’s ability to perform its
2 normal operations, including maintenance work and capital improvements; 2. Influx of request
3 from government agencies including the Federal USDA that often requires immediate attention
4 from the Company’s limited personnel; and 3. Not having enough qualified Staff to oversee and
5 perform licensed operation services. According to the Company, these limitations result in a
6 situation where the Company is not able to fully develop and file an adequate rate case.

7 Staff investigated the Company’s request and determined that based on the Company’s
8 circumstances it is not unreasonable to extend the rate case filing deadline by six (6) months.
9 Staff notes, however, that during its investigation, Staff found that the Company’s current
10 collection of rate case expenses from its previous rate case were stipulated to be fully amortized
11 on or by January 1, 2024.³ As a result, Staff had conversations with the Company regarding the
12 collection of the Company’s previous rate case expenses and both parties mutually agreed that
13 Staff would file a deferral for said expenses. Staff has, therefore, filed a deferral for the
14 Company’s previous rate case expenses for a 12-month period, beginning January 1, 2024.
15 Staff’s deferral application is docketed in UM 2310.⁴ Staff’s deferral application is on the
16 agenda for the April 16, 2024, Public Meeting for a Commission decision. Staff believes that
17 upon approval of Staff’s deferral application in UM 2310, it would be reasonable to grant the
18 Company’s six-month rate case filing extension request to be due on or before December 31,
19 2024. Staff, therefore, respectfully requests that the Commission grant this motion to modify
20 Order No. 18-488.

21 **PROPOSED MODIFICATION**

22 Staff respectfully request that the Commission approve this motion to modify Order No.
23 18-488 to provide for the following: extend the deadline for Government Camp to file a new rate
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25 ³ *Id.* at 6.

26 ⁴ *In re OPUC, Application to Defer Collection of Government Camp Water Company Rate Case Expenses*, OPUC Docket No. UM 2310, Dec. 29, 2023.

1 case on or before December 31, 2024.

2 This modification will afford the Company the proper amount of time that it needs to file
3 a thorough and comprehensive rate case.

4 **CONCLUSION**

5 For the reasons described in this motion, Staff respectfully requests that the Commission
6 adopt the modification to Order No. 18-488 proposed in this motion so that the Company may
7 file its rate case on or before December 31, 2024.

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9 DATED this 23rd day of April 2024.

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Respectfully submitted,

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ELLEN F. ROSENBLUM

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Attorney General

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/s/ Marli Klass

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Marlie Klass, OSB No. 223244

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Assistant Attorney General

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Of Attorneys for Staff of the Public Utility
Commission of Oregon

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UW 174

In the Matter of
GOVERNMENT CAMP WATER
COMPANY, INC.,
Request for a General Rate Revision.

NOTICE OF MOTION TO MODIFY
COMMISSION ORDER NO. 18-488

On April 23, 2024, Staff of the Oregon Public Utility Commission (Staff) filed a Motion to Modify Commission Order No. 18-488.

Consistent with ORS 756.568, Staff moves the Commission to modify Order No 18-488. Order No. 18-488 requires Government Camp Water Company (Company) to file a rate case on or before June 1, 2024. Due to the Company’s unique circumstances, it is unable to develop and file a new rate case on or before June 1, 2024. Staff looked into the Company’s request and determined that a six-month rate case deadline extension would be appropriate at this time.

Persons who wish to obtain a copy of Staff’s Motion to Modify Commission Order No. 18-488 will be able to access it on the Public Utility Commission of Oregon’s website.

DATED this 23rd day of April 2024.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

/s/ Marli Klass

Marli Klass, OSB No. 223244
Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon

UW 174 - CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Staff's Motion to Modify Commission Order No 18-488** to be served by electronic mail to those parties whose e-mail addresses appear on the attached service list for OPUC Docket UW 174.

DATED this 23rd day of April 2024.

/s/ Marli Klass

Marli Klass, OSB No. 223244
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Of Attorneys for Staff of the Public Utility
Commission

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Printed: 2/20/2019

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Printed: 2/20/2019

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Printed: 2/20/2019

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