



VIA ELECTRONIC FILING

August 27, 2021

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

**Re: UW 186 – Sunriver Water LLC Request for a General Rate Revision
Motion to Vacate Procedural Schedule**

To Whom It May Concern:

Sunriver Water LLC hereby files a motion to vacate the procedural schedule adopted in the above-mentioned proceeding in the Prehearing Conference Memorandum issued on July 14, 2021.

Sincerely,

Sunriver Water LLC

/s/ Tim Smith

Tim Smith
General Manager

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UW 186

In the Matter of
SUNRIVER WATER LLC,
Request for a General Rate Revision

MOTION TO VACATE PROCEDURAL
SCHEDULE

Expedited Consideration Requested

Before Administrative Law Judge
Christopher J. Allwein

1 Pursuant to OAR 860-001-0420, Sunriver Water LLC (“Sunriver Water” or
2 the “Company”) moves the Administrative Law Judge (“ALJ”) to issue a ruling that
3 vacates the procedural schedule adopted for this proceeding in the ALJ’s
4 Prehearing Conference Memorandum issued on July 14, 2021. Good cause exists
5 to issue such a ruling for the reasons set forth below. Because the Company
6 simultaneously is filing revised tariff sheets that bear an issued date and an
7 effective date that reflect the granting of this requested motion, Sunriver Water
8 requests that the motion be issued on an expedited basis.

9 In support of this motion, the Company states:

10 1. On August 23, 2021, two comments were filed by members of the
11 public in this docket. The commenters raised concerns about notice to customers
12 of the Company’s general rate case filed on May 28, 2021.

13 2. On August 24, 2021, Staff of the Public Utility Commission of Oregon
14 (“Staff”) issued a data request inquiring about the timing and methods of the
15 Company’s compliance with the notice requirements of the OAR.

16 3. In the course of conversations to prepare a response to Staff’s data
17 request, the Company determined that, as a result of a miscommunication, it had

1 not provided notice to customers as either a separate written notice inserted in its
2 regular billing or a written notice delivered to customers in accordance with OAR
3 860-036-2030(1) and OAR 860-036-2030(2) and it had not made the general rate
4 case filing available in the Company's main office in Oregon in accordance with
5 OAR 860-036-2030 or on its website.

6 4. Company counsel verbally informed counsel for Staff about this
7 situation at the end of the business day on August 24, 2021. On the morning of
8 August 25, 2021, the Company held a virtual meeting with the parties to this case,
9 Staff and Sunriver Owners Association ("SROA"), to discuss this situation. Based
10 on those conversations, it was determined that Sunriver Water should file this
11 motion and file revised tariff sheets with a new effective date. It is the Company's
12 understanding that once it has made these filings, the Public Utility Commission of
13 Oregon (the "Commission") will decide on the suspension period of those revised
14 tariff sheets and a new public comment hearing will be scheduled. Based on the
15 suspension period decision and public comment hearing date, the Company
16 understands that Staff will draft a revised procedural schedule and circulate it to the
17 parties for review ahead of its submission at the public comment hearing.

18 5. Sunriver Water appreciates the patience and consideration of the
19 Commission, the ALJ, Staff, SROA and the Company's customers in light of the
20 Company's oversight that caused it to not provide due notice to customers and that
21 therefore resulted in resources being spent over a prolonged period of time.
22 Sunriver Water takes its compliance obligations very seriously, and it is
23 implementing processes to ensure notice is provided properly going forward.

1 6. The Company's website (www.sunriverwater.com) now contains a
2 prominent notice on the main page under "News and Updates" that it filed for a
3 water rate revision with the Commission on May 28, 2021, and that notice contains
4 links to that filing and to the customer notice being mailed to the Company's
5 customers on Monday, August 30, 2021. The notice being mailed also informs
6 customers that, with the Company's office currently closed to the public to ensure
7 the safety of its staff and customers during COVID-19, they may call the Company
8 at its office to schedule a socially-distanced appointment to view the filing or to
9 inquire more about the filing. Sunriver Water will file in this docket proof that the
10 customer notice has been mailed to its customers.

11 7. Sunriver Water has made a good faith effort to confer with other parties
12 to seek agreement about the subject of the motion, in compliance with OAR 860-
13 001-0420(2). As a follow-up to the conversations and determination mentioned
14 above, Sunriver Water has shared a copy of this motion with the other parties and
15 the other parties have authorized the Company to state on their behalf that they
16 support the motion and that it should be filed.

17 8. Expedited consideration of this motion is being requested because the
18 Company simultaneously is filing revised tariff sheets that bear an issued date and
19 an effective date that reflect the granting of this requested motion. In compliance
20 with OAR 860-001-0420(6), the Company certifies that it has attempted to contact,
21 and in fact has contacted, the other parties to the proceeding to discuss the motion.
22 During a virtual meeting on the afternoon of August 27, 2021, the parties stated
23 their support of this motion. As the other parties in this proceeding support this

1 motion, the Company requests to shorten or eliminate the time for responses and, if
2 applicable, replies.

3 For the foregoing reasons, Sunriver Water requests that the ALJ issue a
4 ruling that vacates the procedural schedule adopted for this proceeding in the ALJ's
5 Prehearing Conference Memorandum issued on July 14, 2021, and take such
6 further action as the ALJ deems appropriate and reasonable in light of this motion.

7 Dated August 27, 2021.

8 Respectfully submitted,

9 **NW NATURAL**

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