

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

WJ 8

In the Matter of)
) MOTION FOR EXTENSION OF TIME
CROOKED RIVER RANCH WATER)
COMPANY)
)
An Investigation Pursuant to ORS 756.515 to)
Determine Jurisdiction)

COMES NOW Crooked River Ranch Water Cooperative formerly known as Crooked River Ranch Water Company and hereinafter referred to as CRRWC and moves for an extension of time for the filing of testimony and exhibits. The original due date for CRRWC testimony and exhibits is March 8, 2010.

A prehearing conference in this proceeding was held on January 8, 2010. At the hearing Administrative Law Judge Patrick Power inquired of counsel for CRRWC how long counsel would need to respond to Staff's Initial Testimony and Exhibits. Counsel responded that the nature of Staff's testimony was unknown however, it was anticipated that three weeks would be needed. A schedule allowing for three weeks between submission of Staff and CRRWC's testimony was implemented.

CRRWC has three basis to request additional time. As this Court is aware CRRWC has objected both at the administrative and appellate level to the submission by Staff of additional information on the record during remand portion of this proceeding. Until such time as relief is afforded to CRRWC in this regard, CRRWC is compelled to respond to the additional evidence submitted for the record in Staff testimony. CRRWC could not have anticipated that the volume of Staff testimony on remand in this proceeding would exceed the volume of Staff testimony in the original portion of the proceeding.

The second basis for this request is that the schedule originally adopted required submission of Staff testimony by February 16, 2010. Counsel for CRRWC first began to receive e-mails containing attachments with Staff testimony on February 16, 2010. These e-mails continued through February 19. Counsel for CRRWC received no less than 28 separate e-mails regarding submission of Staff testimony and corrections to those submissions. The first hard copies of Staff testimony were received at counsel's office on February 18. It is unknown if further hard copies will be

1- MOTION FOR EXTENSION OF TIME

forthcoming to correspond with the ongoing e-mail submissions of corrected information. Counsel has not yet had the opportunity to reconcile the 28 e-mail submissions with hard copies received. CRRWC will require additional time just to establish what the correct record is of Staff testimony prior to examining the merits of said testimony.

The last reason for the this request is that the General Manager for CRRWC, is obligated to participate in training between February 22-26th and is unavailable to respond to Staff testimony during that time period.

For reasons stated above CRRWC requests an extension of four weeks (4) from February 18, 2010, to prepare and submit CRRWC testimony and exhibits.

RESPECTFULLY submitted this 23rd day of February 2010.

GLENN, SITES, REEDER & GASSNER, LLP

/s/ Timothy R. Gassner
TIMOTHY R. GASSNER OSB 02309
Of Attorneys for CRRWC