

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UP 384

In the Matter of:

SALE OF SUNRIVER WATER LLC TO
NW NATURAL WATER

PETITION TO INTERVENE

The Sunriver Owners Association petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Hugh Palcic, General Manager
Company: Sunriver Owners Association
Street Address: 57455 Abbot Drive
City, State, Zip: Sunriver, Oregon 97707
Email Address: hughp@srowners.org
Telephone: (541) 593-2411

Please include this contact on the service list.

2a. The petitioner will will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Josh Newton
Company: Karnopp Petersen LLP
Street Address: 360 SW Bond Street Ste. 400
City, State, Zip: Bend, OR 97702
Email Address: jn@karnopp.com
Telephone: (541) 382-3011

Name: John W. Stephens
Company: Esler Stephens & Buckley
Street Address: 121 SW Morrison Street Ste. 700
City, State, Zip: Portland, OR 97204
Email Address: stephens@eslerstephens.com
Telephone: (503) 223-1510

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: None
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

Petitioner is an Oregon nonprofit corporation comprised of 4188 members. Those 4188 members consist of 4176 residential units, 9 commercial entities, and 3 resort entities. Petitioner is organized to provide for the management, maintenance, protection, and preservation of Sunriver, and to promote the health, safety, and welfare of its members, not for profit, but for the mutual advantages to be derived there from by the Consolidated Plan of Sunriver. (Articles of Incorporation of The Sunriver Owners Association, last amended September 15, 1997)

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

Petitioner and its members constitute the substantial majority of Sunriver Water's approximate population of 4,500 customers. Petitioner's interest in the proceeding include a right of first refusal or a first offer right in SROA of the ownership interests in Sunriver Water LLC.

5. The issues the Petitioner intends to raise at the proceeding are:

Petitioner intends to represent itself and its members in connection with the proposed sale of Sunriver Water LLC to ensure that Petition and its members receive safe and adequate service at fair and reasonable rates. Petitioner also intends to assist, as appropriate, the investigation of issues raised by the Commission staff and other parties in the proceeding.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

Petitioner is the homeowners association for Sunriver. Petitioner possesses significant institutional knowledge regarding the Sunriver community and believes that it can assist the Commission in evaluating the proposed sale Sunriver Water LLC.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Josh Newton

Petitioner or Petitioner's Representative

Date: November 19, 2018