

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

WA 83

In the Matter of  
SUNRIVER WATER LLC  
Expanded Service Territory Application.

PETITION TO INTERVENE

Pine Forest Development, LLC 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: Tom O'Shea  
Company: Pine Forest Development, LLC  
Street Address: 17600 Center Drive  
City, State, Zip: Sunriver, OR 97707  
Email Address: thomas.o'shea@sunriver-resort.com  
Telephone: (541) 593-4915

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: Steven P. Hultberg  
Company: Radler White Parks & Alexander LLP  
Street Address: P.O. Box 2007  
City, State, Zip: Bend, OR 97709  
Email Address: shultberg@radlerwhite.com  
Telephone: (541) 585-3697

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

Name: John Fettig  
Company: Pine Forest Development, LLC  
Street Address: 17600 Center Drive  
City, State, Zip: Sunriver, OR 97707  
Email Address: john.fettig@sunriver-resort.com  
Telephone: 541-593-7910

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 limited liability company which consists of one member. The sole member of Petitioner is Sunriver Resort Limited Partnership. Petitioner is organized for the purpose of owning, developing, managing, operating, maintaining, and eventually transferring, selling and/or exchanging an approximately 617-acre parcel of land located in Deschutes County, Oregon adjacent to the eastern boundary of the Caldera Springs Resort.

List of Members attached

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

Petitioner and related entities have developed the Caldera Springs Destination Resort. In 2018, Petitioner received approval to expand Caldera Springs on the 617-acre property identified above. Petitioner specifically requested that Sunriver Water, LLC expand its service territory to serve the expanded resort. Consequently, Petitioner has a vested interest in the outcome of this proceeding.

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

Petitioner has prepared water needs analysis and a water master plan for the expanded resort in coordination with Sunriver Water, LLC. Petitioner intends to discuss water capacity, water infrastructure and costs associated with service territory expansion.

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

As the developer of the expanded resort, Petitioner has specific knowledge and expertise regarding the water needs of the expanded resort. Petitioner is in the best position to assist the Commission with evaluating the needs of the resort and how those needs relate to the capacity of Sunriver Water LLC to serve the resort and ensure there are no negative impacts to Sunriver Water LLC or its existing customer base.

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/ Steven P. Hultberg  
Petitioner or Petitioner's Representative

June 22, 2021  
Date Signed