



LAURA C. MAFFEI, R.G.
ADMITTED IN OREGON AND WASHINGTON

lmaffei@cablehuston.com
www.cablehuston.com

February 29, 2024

VIA EMAIL - puc.filingcenter@puc.oregon.gov

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

Re: NC 405 – In the Matter of Public Utility Commission of Oregon v. City of
Portland

Dear Filing Center:

Intervenors League of Oregon Cities and Oregon Association of Clean Water Agencies respectfully submit their combined Closing Brief in Case No. NC 405.

Very truly yours,

A handwritten signature in blue ink that reads 'Laura Maffei'.

Laura C. Maffei, R.G.

LCM:arh
Enclosure

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

3 **NC 405**

4 PUBLIC UTILITY COMMISSION OF
5 OREGON,

6 Complainant,

7 v.

8 THE CITY OF PORTLAND,

9 Defendant.

**INTERVENORS LEAGUE OF OREGON
CITIES AND OREGON ASSOCIATION
OF CLEAN WATER AGENCIES
CLOSING BRIEF**

10 Intervenor League of Oregon Cities (“LOC”) and Oregon Association of Clean Water
11 Agencies (“ACWA”) (collectively, “Intervenors”) jointly submit this Closing Brief. LOC and
12 ACWA represent cities and municipal entities across Oregon who may be impacted by the
13 outcome of this case.¹

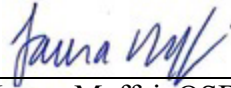
14 Intervenor LOC and ACWA support the arguments included in the City’s Closing Brief
15 and incorporate them by reference. Intervenors reiterate that the outcome of this case will have
16 an impact state-wide and is not limited to the City of Portland. Intervenors respectfully request
17 that the PUC’s interpretation of the locates rules be rejected and that its complaint against the
18 City of Portland be dismissed.

19
20
21
22
23
24
25
26

¹ Response Testimony ACWA/100 at 1-2; Response Testimony LOC/100 at 1-2.

1 Dated this 29th day of February, 2024.

2 Respectfully submitted,

3
4 

5 _____
6 Laura Maffei, OSB No. 993177
7 Cable Huston LLP
8 Email: lmaffei@cablehuston.com
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26