1	BEFORE THE PUBLIC UTILITY COMMISSION	
2	OF OREGON	
3	UW 117	
4	In the Matter of	
5	PETE'S MOUNTAIN WATER CO., INC.	APPLICANT'S CLOSING BRIEF
6 7	Request for an increase in total annual revenues from \$111,079 to \$212,300	
8		
9	The applicant, Pete's Mountain Water Company, Inc. (herein the "company"), has	
10	reviewed the "Staff's Closing Brief." The company concurs with Staff's arguments and	
11	reasoning, and joins in Staff's brief.	
12	There is one additional issue that may be raised by the intervenor, Kenneth E. Roberts,	
13	in his closing brief. If so, now will be the company's only chance to address the matter.	
14	In her testimony on cross-examination, Suzanne Webber misstated the frequency of her	
15	trips to the company's bank. When pressed for a number by Mr. Roberts, Ms. Webber said, as	
16	we recall, two or three times a week. She now realizes that two or three times a month would	
17	be more accurate, though as she testified, she has not kept a log of her daily activities. Ms.	
18	Webber regrets the error and apologizes for it. But in any event, this overstatement of the	
19	frequency of banking trips is immaterial because, as she testified, the bank is about a block from	
20	the Post Office, and she does her banking in conjunction with trips to the Post Office. Thus, the	
21	mileage traveled would be no different whether she banked two times a month or two times a	
22	/////	
23	11111	
24	/////	

1	week. The difference in time spent would be de minimis—maybe an hour or so a month	
2	difference if one assumes about 10 minutes in the bank on each visit.	
3	Respectfully submitted,	
4		
5	James A. Cox, OSB No. 57019	
6	Attorney for Applicant	
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CERTIFICATE OF SERVICE

STATE OF OREGON

County of Marion; ss.

I certify that I served the foregoing document on the following parties or attorneys by electronic mail addressed as follows on November 9, 2006:

Jason W. Jones, PUC Staff attorney – <u>Jason.w.jones@doj.state.or.us</u>

Kenneth E. Roberts, intervenor – <u>robek@fosterpdx.com</u>

Jo Becker, intervenor – jojobkr@aol.com

David and Kay Pollack, intervenors - dapollack@aol.com;

and by United States mail deposited in the Post Office at Woodburn, Oregon on November 9, 2006:

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