



California American Water – Monterey
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January 31, 2018

Erik Ekdahl, Deputy Director
Division of Water Rights
State Water Resources Control Board
1001 I Street
Sacramento, CA 95812

Re: SWRCB Order WR 2016-0016 / WR 2009-0060, 1st Quarterly Report for the 2017-2018 Water Year Addressing Operations for the Period of October 1, 2017 to December 31, 2017.

Dear Mr. Ekdahl:

Pursuant to Condition Eight of Order WR 2016-0016 and Condition Six of Order WR 2009-0060, this letter is California American Water's report for the 1st quarter of Water Year 2018 covering the period of October 1, 2017 to December 31, 2017. This report has been modified from previous quarterly reports submitted in accordance with Order WR 2016-0016. For ease of reference, the requirement of each subsection is summarized, followed by the requested information.

Condition 8(a)

Condition 8(a) requires California American to provide monthly summaries of the total quantity of water produced from the Carmel River, and other separate sources of water used by Cal-Am within the service area.

Compliance with Condition 8(a):

Table One summarizes the total quantity of water produced from the Carmel River, and other separate sources of water used by Cal-Am within the service area by month. This data is compiled from meter readings that are collected daily from California American Water's pumps, either through an employee manually reading each meter, or through an employee reading the data from the Supervisory Control and Data Acquisition ("SCADA") system. A California American Water employee manually enters those daily readings into a spreadsheet that is provided to the Monterey system General Manager. The spreadsheet is designed to automatically calculate the monthly total from the daily readings. At the end of each month, this daily summary is cross-checked against SCADA information that is separately maintained for each well.

**Table One
Total Quantity of Water Produced from Carmel River and other separate sources of water used by Cal-Am within the service area by month**

Month	Carmel Valley Wells ¹ (AF)	Eastwood-Cañada Well (AF)	Seaside Wells ² (AF)	Sand City Desal (AF)	Total Production (AF)
Oct 2017	529.06	2.55	367.69	13.70	912.99
Nov 2017	416.12	6.01	307.12	2.85	732.10
Dec 2017	398.28	0.67	315.00	26.17	740.12
Q1 Total	1,343.46	9.22	989.81	42.72	2,385.21
WYTD	1,343.46	9.22	989.81	42.72	2,385.21
Jan 2018					
Feb 2018					
Mar 2018					
Q2 Total					
WYTD					
Apr 2018					
May 2018					
Jun 2018					
Q3 Total					
WYTD					
Jul 2018					
Aug 2018					
Sep 2018					
Q4 Total					
WYTD					

¹Includes ASR Injection

²Includes ASR Recovery

Condition 8(b)

Condition 8(b) requires California American Water to provide monthly summaries of the total quantity of ASR project water diverted from the river under water right Permit 20808A and Permit 20808C and stored in the Seaside Groundwater Basin, including the separate accounting of the amounts pumped in excess of 600 afa. The monthly reporting shall also state the quantity of ASR water recovered from aquifer storage and beneficially used, and the current balance of ASR water remaining in storage in the Seaside Groundwater Basin.

Compliance with Condition 8(b):

Table Two summarizes by month the quantity of ASR project water diverted from the Carmel River under Permit 20808A and Permit 20808C, and includes a separate accounting of the amounts pumped in excess of 600 afa. This summary is from a spreadsheet e-mailed to the General Manager for California American Water's Monterey system by a Monterey Peninsula Water Management District employee each business day during the diversion season. This spreadsheet shows the gallons of water injected into each of the four injection wells. California American Water understands that the daily injection data is a manual reading of the meters on the injection pumps by a Monterey Peninsula Water Management District employee. This spreadsheet also contains a formula that converts the number of acre-feet based on the gallons injected and also totals the daily readings for the month. The information in Table Two is taken directly from this spreadsheet.

The data regarding ASR water recovered is taken from the Quarterly Water Budget developed cooperatively between California American Water, the Monterey Peninsula Water Management District, NOAA Fisheries, and the California Department of Fish and Wildlife, and represents an accounting of water withdrawn from the Seaside Groundwater Basin.

**Table Two
Monthly Water Diverted to Storage and Storage Balance**

Month	Well 1 Diverted to Storage (AF)		Well 2 Diverted to Storage (AF)		Well 3 Diverted to Storage (AF)		Well 4 Diverted to Storage (AF)		ASR Injection (AF)	ASR Injection Balance in excess of 600 (AF)	ASR Recovery (AF)	Month End ASR Storage Balance (AF)
	Permit 20808A	Permit 20808C	Permit 20808A	Permit 20808C	Permit 20808A	Permit 20808C	Permit 20808A	Permit 20808C				Previous WY (AF) 1148.78
Oct 2017	0	0	0	0	0	0	0	0	0	0	0	1148.78
Nov 2017	0	0	0	0	0	0	0	0	0	0	0	1148.78
Dec 2017	0	0	0	0	0	0	0	0	0	0	0	1148.78
Q1 Total	0	0	0	0	0	0	0	0	0	0	0	
WYTD	0	0	0	0	0	0	0	0	0	0	0	1148.78
Jan 2018												
Feb 2018												
Mar 2018												
Q2 Total												
WYTD												
Apr 2018												
May 2018												
Jun 2018												
Q3 Total												
WYTD												
Jul 2018												
Aug 2018												
Sep 2018												
Q4 Total												
WYTD												

Condition 8(c)

Condition 8(c) requires California American Water to provide monthly summaries of the quantity of water being supplied by the Malpasos Water Company to Cal-Am and to Malpasos customers supplied using Cal-Am facilities. The reporting shall identify the amount of water used at Cal-Am's existing meter connections and within the Cal-Am service area, and the amounts at new service connections served by Malpasos Water Company. The monthly reports shall specify the quantity of water used to reduce diversions from the river during the reporting period.

Compliance with Condition 8(c):

Table Three summarizes by month the quantity of water supplied by the Malpasos Water Company, the quantity of water used by new connections, and quantity of water used to reduce river diversions.

Table Three			
Malpasos Water Company Monthly Production and Product Allocation			
Month	Malpasos Production (AF)	Use by Malpasos Connections* (AF)	Water Used to Reduce Diversions (AF)
Oct 2017	2.55	0.53	2.02
Nov 2017	6.01	0.53	5.48
Dec 2017	0.67	0.53	0.14
Jan 2018			
Feb 2018			
Mar 2018			
Apr 2018			
May 2018			
Jun 2018			
Jul 2018			
Aug 2018			
Sep 2018			
Total	9.22	1.58	7.64

*See Attachment Three and Four

Condition 8(d)

Condition 8(d) requires California American Water to provide monthly summaries of the quantity of water produced by the City of Pacific Grove, and the quantity of water used to reduce diversions from the river during the reporting period. Cal-Am shall not deliver water produced by the City of Pacific Grove unless such use is consistent with Resolution 2015-0070, paragraph 4.

Compliance with Condition 8(d):

Table Four summarizes by month the quantity of water produced by the City of Pacific Grove, and the quantity of water used to reduce river diversions.

Table Four City of Pacific Grove Monthly Production and Product Allocation		
Month	City of Pacific Grove Production (AF)	Water Used to Reduce River Diversions (AF)
Oct 2017	0	0
Nov 2017	0	0
Dec 2017	0	0
Jan 2018		
Feb 2018		
Mar 2018		
Apr 2018		
May 2018		
Jun 2018		
Jul 2018		
Aug 2018		
Sep 2018		
Total	0	0

Condition 8(e)

Condition 8(e) requires California American Water for the final quarter of each water year to report the quantification and basis of any credits earned and of any amount being carried over for future years.

Compliance with Condition 8(e):

Table Five (a) summarizes the Effective Diversion Limit adjustment calculation, Table Five (b) summarizes the adjusted Carmel Valley Well production calculation, and Table Five (c) summarizes the final quarter quantification and basis of credits earned to be carried over for future years.

Table Five (a) Effective Diversion Limit Adjustment Calculation (AF)	
Effective Diversion Limit	8,310
Penalty for Missed Milestones	(0.00)
Water Produced by Sand City not used by Sand City Customers	(23.65)
Pure Water Monterey Groundwater Replenishment Project Water Recovery	(0.00)
Carry over credit from previous water year	750.00
Instream Flow Agreement Carry Over Credit (50%) from previous water year	0.00
Adjusted Effective Diversion Limit	*8,310

* EDL cannot exceed 8,310 AF

Table Five (b) Adjusted Carmel Valley Well Production Calculation (AF)	
Carmel Valley Well Production (excludes Malpaso Water)	1,343.46
Malpaso Water Produced not served to subscribers	7.64
Water served to Pebble Beach entitlements	(0.00)
ASR Injection in excess of 600AF	(0.00)
Adjusted Carmel Valley Well Production	1,351.10

Table Five (c) *Final Quarter Quantification and Basis of Credits earned and Amount Being Carried Over (AF)	
Adjusted EDL (from Table 5a)	
Adjusted Carmel Valley Well Production (from Table 5b)	
Carry over credit for Future Years (not to exceed 750 AF)	

* Data in this table only populated in the Final (Fourth) Quarter of the WY.

Condition 8(f)

Condition 8(f) requires California American Water to provide an accounting of the progress towards completion of the Water Supply Project MPWSP Desalination Plant and Pure Water Monterey Project that identifies all progressive steps completed during the previous 12 months and the upcoming 12 month's anticipated progress, and discussion of potential setbacks that may be beyond the Applicant's control.

Compliance with Condition 8(f):

Progressive Steps Completed During the Previous 12 Months

The milestone for Water Year 2015-2016 CPUC approval of (1) the Water Purchase Agreement for Cal-Am's purchase of Pure Water Monterey water, and of (2) construction of the Cal-Am components of the Pure Water Monterey conveyance facilities was achieved on September 22, 2016, when the CPUC issued Decision 16-09-021. The SWRCB was provided notice on 9/27/2016.

The milestone for Water Year 2016-2017, start of construction of the Cal-Am components of the Pure Water Monterey project, meaning commencement of physical work after issuance of required regulatory permits and authorizations to begin work must be achieved by September 30, 2017. Cal Am commenced construction of the Monterey pipeline and pump station project as part of the Pure Water Monterey project in October 2016, and commenced installation of the 36-inch pipeline on January 3, 2017. Cal Am has therefore timely achieved this milestone.

Additionally, the test slant well for the MPWSP desalination plant has been operating for over 730 days of pumping. Data collected from test well operation and monitoring has been posted and is available for review on the project website.

Anticipated Progress in the Upcoming 12 Months

- First Quarter 2018 – Anticipated Release of Final EIR/EIS Approval and CPCN by CPUC
- Third Quarter 2018 – Anticipated EIR/EIS Approval and CPCN by CPUC
- 2019 – Coastal Development Permit approvals

Anticipated actions by the CPUC are beyond Cal-Am's control.

Condition 6(a)

Condition 6(a) requires California American to provide monthly summaries of the quantity of water it diverts from the river.

Compliance with Condition 6(a):

See Table One, above (compliance with SWRCB Order WR 2016-0016 Condition 8(a)).

Condition 6(b)

Condition 6(b) requires California American Water to provide monthly summaries of the quantity of ASR project water diverted from the river under Permit 20808A and Permit 20808C and stored in the Seaside groundwater basin. The monthly report is to state the quantity of water beneficially used under Permit 20808A and Permit 20808C and the current balance of water in storage.

Compliance with Condition 6(b):

Condition 6(b) superseded by SWRCB Order WR 2016-0016 Condition 8(b).

Condition 6(c)

Condition 6(c) requires California American Water to provide monthly summaries of the quantity of water being produced by the Sand City desalination plant. The report is also to identify new service connections within Sand City and report the quantity of water being delivered to the new connections. The monthly report is also to specify the quantity of water used to reduce diversions from the river during the reporting period.

Compliance with Condition 6(c):

Table Six lists the number of new connections in the City of Sand City by month. This information is taken from Attachment One. Attachment One is manually compiled by a California American Water employee from the water connection permits issued by the Monterey Peninsula Water Management District and subsequently provided to California American Water by prospective customers. If a listing on Attachment One has no "Installed Date," the customer has provided California American Water with the water connection permit, but has not requested a meter to be installed.

Table Six New Connections Within the Sand City		
Month	New Connections	Installed Date
Oct 2017	0	
Nov 2017	0	
Dec 2017	0	
Jan 2018		
Feb 2018		
Mar 2018		
Apr 2018		
May 2018		
Jun 2018		
Jul 2018		
Aug 2018		
Sep 2018		

Table Seven summarizes by month the quantity of water produced by the Sand City desalination plant, the quantity of water used by new connections, and quantity of water used to reduce river diversions.

Table Seven			
Sand City Desalination Facility Monthly Production and Product Allocation			
Month	Sand City Production (AF)	Water Used by New Connections (AF)	Water Used to Reduce River Diversions (AF)
Oct 2017	13.70	0.034	13.67
Nov 2017	2.85	0.039	2.81
Dec 2017	26.17	0.051	26.12
Jan 2018			
Feb 2018			
Mar 2018			
Apr 2018			
May 2018			
Jun 2018			
Jul 2018			
Aug 2018			
Sep 2018			
Total	42.72	0.124	42.60

Condition 6(d)

Condition 6(d) requires California American Water to provide monthly summaries of the quantity of water saved by reducing system losses.

Compliance with Condition 6(d):

Water systems typically calculate losses using a 12-month running average to smooth seasonal variations in the data. Table Eight lists the 12-month running average for Monterey Main System losses and compares the losses to an October 2008 through September 2009 base period. The 12-month running average is calculated by subtracting the cumulative metered consumption from the Monterey Main System production volumes which consist of Carmel Valley, Seaside, and Sand City production. The cumulative metered consumption is based on the individual monthly meter readings and is obtained from a report generated by our accounting system. The Monterey system General Manager calculates the difference from these two numbers to arrive at the monthly system loss, and then calculates the 12-month running average from the monthly data.

Table Eight		
12-Month Running Average of Unaccounted For Water		
12 Month Period	System Losses (AF)	Savings Compared to Base Year (AF)
Oct 08 - Sep 09	1276 (base year)	NA
Nov 16 - Oct 17	426.29	849.71
Dec 16 – Nov 17	535.93	740.07
Jan 17 - Dec 17	483.78	792.22
Feb 17 – Jan 18		
Mar 17 – Feb 18		
Apr 17 – Mar 18		
May 17 – Apr 18		
Jun 17 – May 18		
Jul 17 – Jun 18		
Aug 17 – Jul 18		
Sep 17 – Aug 18		
Oct 17 – Sep 18		

It is difficult to identify the actual components of unaccounted-for-water as it is a combination of system leaks and actual water use not captured by meters. A high priority is being given to identifying and repairing leaks, meter replacement, and infrastructure replacement. Table Nine presents information on leaks detected and repaired. Each time a leak is detected, a California American Water repair crew responds to repair the leak. The assigned crew leader prepares a "leak report." The information in Table Nine is based on a manual count of the leak reports received by the Monterey system General Manager.

Table Nine		
Total Main and Service Leak Repairs		
Month	Main Leaks	Service Leaks
Oct 2017	10	39
Nov 2017	9	29
Dec 2017	18	21
Jan 2018		
Feb 2018		
Mar 2018		
Apr 2018		
May 2018		
Jun 2018		
Jul 2018		
Aug 2018		
Sep 2018		
Total	37	89

Table Ten summarizes service, main, meter, and hydrant replacements. Please note that service, main, meter and hydrant replacements are performed by both California American Water's forces and contractors. Service replacements are tracked via work orders for various purposes, including accounting and system management. The service replacements are calculated by a California American Water Operations supervisor from these work orders. The quantity of water mains and fire hydrants replaced is compiled by a California American Water Operations supervisor from Engineering Department records, which in turn are based on information from contractors. California American Water maintains records regarding meter replacements for various purposes, including reporting to the California Public Utilities Commission and inventory control. The number of meters replaced was compiled by a California American Water Operations supervisor from these records. To the extent that the data in Table Ten includes contractor reports or data from invoices for contract services, this information: (a) is based on the representations made by our contractors; (b) may include field estimates for the lengths of pipe replaced.

Table Ten				
Monthly Totals of Water Service, Main, Meter and Fire Hydrant Replacements				
Month	Service Replacements Number	Main Replacements Feet	Meter Replacements Number	Fire Hydrant Replacements Number
Oct 2017	100	4,700	122	1
Nov 2017	9	0	67	2
Dec 2017	27	2,679	119	3
Jan 2018				
Feb 2018				
Mar 2018				
Apr 2018				
May 2018				
Jun 2018				
Jul 2018				
Aug 2018				
Sep 2018				
Total	136	7,379	308	6

Condition 6(e)

Condition 6(e) requires California American Water to provide monthly summaries of reductions in demand for potable water due to conservation actions such as increased rates, the Monterey Peninsula Water Management District's retrofit program, programs to reduce potable water use for outdoor irrigation, and other demand reduction initiatives.

Compliance with Condition 6(e):

California American Water implemented a new conservation rate structure effective February 1, 2010. The change in the rate structure is shown in Table Eleven. The residential tiered conservation rate structure increases were directed at the top tier users and were designed to promote conservation practices and reduce overall water usage.

Table Eleven			
Main System Residential Rate Structure Effective			
Tier	Old Rates Per Unit February 2009	Current Rates Per 100 Gallons August 2017	Percent Change
1	\$0.2298	\$0.7287	217.10%
2	\$0.4596	\$1.5039	227.22%
3	\$0.6894	\$3.5091	409.01%
4	\$0.9192	\$6.7606	635.49%
5	\$1.8385	\$8.2645	349.52%

A unit of water is equal to 100 gallons.

Table Twelve compares the five year historical tier 4 and 5 usage with actual use. Tier 4 and 5 usage is almost exclusively outdoor watering. There are several factors that can affect water consumption; including price, weather, and conservation efforts. California American Water assumes that the changes in consumption shown in Table Twelve are, in part, a result of the conservation rates and the other conservation activities. Except for savings estimated by the Monterey Peninsula Water Management District for water appliance retrofitting, California American Water cannot attribute specific portions of reduced consumption to rates, weather, or other conservation efforts.

Table Twelve		
Tier 4 and 5 Average Historical Usage (WY 2005 - WY 2009) compared to WY 2018		
Month	Historical Usage (AF)	WY 17-18 (AF)
Oct	91.3	34.18
Nov	92.4	31.42
Dec	64.7	16.29
Jan	43.1	
Feb	37.0	
Mar	31.5	
Apr	44.7	
May	46.2	
Jun	83.4	
Jul	108.6	
Aug	111.3	
Sep	97.9	

Table Thirteen reports the estimated annual water savings from the Monterey district retrofit program. The monthly rebate costs are dependent on the number and type of water conserving appliances. Examples of rebates include High Efficiency Toilet, High Efficiency Dishwasher, High Efficiency Washer, High Efficiency Urinal, Cistern Water Tank, Cooling Tower Conductivity Controller, and X-ray Film Processor Recirculation System. This information was specifically requested from the Monterey Peninsula Water Management District by California American Water's Monterey system General Manager for the purposes of this report. The data provided by the Monterey Peninsula Water Management District and reported in Table Thirteen included the retrofit expenditures and estimated water savings in acre-feet by month.

Table Thirteen		
Total Retrofit Rebate Payments and Estimated Water Savings by Month		
Month	Cost (\$)	Annual Savings (AF)
Oct 2017	38,317	1.89
Nov 2017	43,867	2.14
Dec 2017	54,544	2.26
Q1 Total	136,728	6.29
Jan 2018		
Feb 2018		
Mar 2018		
Q2 Total		
Apr 2018		
May 2018		
Jun 2018		
Q3 Total		
Jul 2018		
Aug 2018		
Sep 2018		
Q4 Total		

The Monterey Peninsula Water Management District and California American Water conduct water conservation audits for homes, businesses and landscape accounts. Table Fourteen shows the total number of audits conducted. The information in Table Fourteen was reported to the Monterey system General Manager by California American Water's local Conservation Manager, who manages the conservation contract with the Monterey Peninsula Water Management District.

Table Fourteen	
Total Water Conservation Audits By Month	
Month	Number of Audits
Oct 2017	98
Nov 2017	69
Dec 2017	40
Q1 Total	207
Jan 2018	
Feb 2018	
Mar 2018	
Q2 Total	
Apr 2018	
May 2018	
Jun 2018	
Q3 Total	
Jul 2018	
Aug 2018	
Sep 2018	
Q4 Total	

Both the Monterey Peninsula Water Management District and California American Water use contractors to perform some audits. Accordingly, the data in Table Fourteen is based, in part, on: (a) representations by those contractors as to the work performed; and (b) information provided by the Monterey Peninsula Water Management District.

The Monterey Peninsula Water Management District and California American Water conducted the following conservation programs and workshops during the reporting period:

California American Water (CAW) in conjunction with the Monterey Peninsula Water Management District (MPWMD), continues to offer and provide conservation programs to its customers, including residential water audits, landscape water audits and water budgets, a rebate program, residential plumbing retrofit program, large landscape workshop program, and a public program.

California American Water Activities:

- 207 Residential Water Audits
- 1 Commercial Audit
- 81 Indoor/Outdoor Rate BMP Compliance Inspections
- 4 Conservation Meetings with the MPWMD
- 125 Data Logs – Customer hourly usage reports downloaded from meters
- 3 Meetings with the Monterey County Water Awareness Committee
- Conservation Events
 - Conservation Table at the Carmel Post Office 12-1-17

Monterey Peninsula Water Management District Activities:

- Inspired Home Expo October 14 and 15, 2017
- 97 CII Inspections

California American Water & Monterey Peninsula Water Management District Joint Conservation Activities:

- Spring Beauty Starts in the Fall Classes
 - Rain Water Harvesting 10-11-17
 - Gardening for Birds and Water Wise Native Plants 10-14-17
 - Design your own water wise native plant garden 10-21-17
 - Sheet Mulching 11-4-17

Condition 6(f)

Condition 6(f) requires California American Water to provide monthly summaries identifying all new service connections. The report is to include the California American Water account number, the service address, the name of each authority granting any approval required for connecting to California American Water's system and the name of each authority granting any approval required before commencing construction; the issuer of each approval and the date of each approval shall be separately listed for each service address.

Compliance with Condition 6(f):

In compliance with Monterey Peninsula Water Management District regulations, California American Water does not connect new customers unless the prospective customer provides California American Water with a water connection permit issued by the Monterey Peninsula Water Management District.

Attachment One is a list of all new connections authorized by the Monterey Peninsula Water Management District. Attachment One is being provided under separate cover as it contains confidential customer account information. California American Water requests the State Water Resources Control Board maintain this information as confidential. As discussed in Section 6(c) above, Attachment One is compiled by California American Water employees from the water connection permits issued by the Monterey Peninsula Water Management District and provided to California American Water by prospective customers. Prospective customers may elect to have a meter installed shortly after presentation of the water connection permit, or may request the meter at a later date. This report includes prospective customers who have presented California American Water with a water connection permit, even if that customer has not requested a meter to be immediately installed. If the customer has provided California American Water with the water connection permit, but has not requested a meter to be installed, the entry on Attachment One has no "Installed Date."

The new connection count does not include emergency fire service connections or the splitting of master meter connections into individual accounts, as neither of these activities increases water use.

Condition 6(g)

Condition 6(g) requires California American Water to provide monthly summaries identifying existing service addresses that receive an increased supply of water due to a change in zoning or use. The report is to include the California American Water account number, the service address and the name of each authority authorizing the change of use or zoning and the date of such change.

Compliance with Condition 6(g):

Attachment Two is a list of permits issued by the Monterey Peninsula Water Management District authorizing changes to existing service addresses that will result in an increased use of water through a change in zoning or use. Attachment Two is being provided under separate cover as it contains confidential customer account information. California American Water requests the State Water Resources Control Board maintain this information as confidential. Although not clearly a "change in zoning or use," Attachment Two includes permits issued for additions to, or

remodeling of, an existing service address where that addition or remodel has been determined by the Monterey Peninsula Water Management District to result in increased water consumption. California American Water requested this information from the Monterey Peninsula Water Management District specifically for this report. The Monterey Peninsula Water Management District provided a spreadsheet that the data from which is included in Attachment Two. This spreadsheet tracks the information by Assessor's Parcel Number. A California American Water employee correlated California American Water's records to the Monterey Peninsula Water Management District's spreadsheet based on Assessor's Parcel Number to obtain the California American Water account number and service address. Other than California American Water account number and service location, all data in Attachment Two was compiled or calculated by the Monterey Peninsula Water Management District. Where there were clear clerical errors in data entry, California American Water corrected those errors in compiling this report.

Conclusion

This concludes our report for the 1st quarter of Water Year 2018. Should you or your staff have any questions please call me at your earliest convenience at (831) 646-3291.

I declare under penalty of perjury, under the laws of the State of California, that all statements contained in this report and any accompanying documents are true and correct, with full knowledge that all statements made in this report are subject to investigation and that any false or dishonest statements may be grounds for prosecution.

Sincerely,



Eric Sabolsice
Director, Operations
Coastal Division
California American Water

Attachments (4)