

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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October 28, 2020

Jeffrey T. Linam
Vice President of Rates & Regulatory
California-American Water Company
4701 Beloit Drive
Sacramento, CA 95838-2434

Dear Mr. Linam,

The Commission has approved California-American Water Company's Advice Letter No. 1306, filed on August 3, 2020, regarding authorization To change pressure requirement exception in General Order 103-A VII.6.D.

Enclosed is a copy of the advice letter with an effective date of September 3, 2020 for the utility's files.

Please contact Bradley Leong at BL4@cpuc.ca.gov or 415-703-2307, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant
Water Division

Enclosures

**CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS**

Advice Letter Cover Sheet

Utility Name: California American Water

Date Mailed to Service List: August 3, 2020

District: All District

CPUC Utility #: U210W

Protest Deadline (20th Day): August 23, 2020

Advice Letter #: 1306

Review Deadline (30th Day): September 3, 2020

Tier 1 2 3 Compliance

Requested Effective Date: September 3, 2020

Authorization

Rate Impact: \$See AL
See AL%

Description: To change pressure requirement exception
in General Order 103-A VII.6.D.

The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list. Please see the "Response or Protest" section in the advice letter for more information.

Utility Contact: Kamilah Jones

Utility Contact: Jonathan Morse

Phone: 916-568-4232

Phone: 916-568-4237

Email: Kamilah.Jones@amwater.com

Email: Jonathan.morse@amwater.com

DWA Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

<u>DATE</u>	<u>STAFF</u>	<u>COMMENTS</u>
_____	_____	_____
_____	_____	_____

[] APPROVED

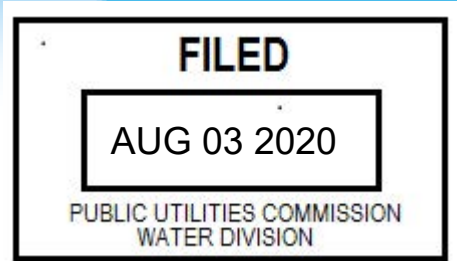
[] WITHDRAWN

[] REJECTED

Signature: _____

Comments: _____

Date: _____



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August 3, 2020

ADVICE LETTER NO. 1306

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Pursuant to General Order 96-B, California-American Water Company (U210W) hereby submits for review this advice letter.

PURPOSE

By this advice letter, California American Water requests a pressure requirement exception as specified under California Public Utilities Commission ("Commission") General Order 103-A VII.6.D. for the limited area that covers the property in question.

BACKGROUND

General Order 103-A VII.6 states:

6. Pressures

A. Variations in Pressure

Each potable water distribution system shall be operated in a manner to assure that the minimum operating pressure at each service connection throughout the distribution system is not less than 40 psi nor more than 125 psi, except that during periods near PHD the pressure may not be less than 30 psi and that during periods of hourly minimum demand the pressure may be not more than 150 psi. Subject to the minimum pressure requirements of 40 psi, variations in pressures under normal operation shall not exceed 50% of the average operating pressure.

The average operating pressure shall be determined by computing the arithmetical average of at least 24 consecutive hourly pressure readings.

It is not currently feasible to provide service to the property in question at the pressure range required by General Order 103-A and therefore California American Water requests this exception to allow for providing service at a lower pressure, which, under the circumstances, California American Water believes will be safe. General Order 103-A VII.6.D. states:

D. Pressure Requirement Exceptions

A water utility may furnish service to a customer at less than the pressure requirement specified in this General Order, if the customer is fully advised of the conditions under which service will be provided, and a customer agreement is secured in writing. The limited nature of the service shall also be recorded as a deed restriction on the property. The properties receiving service at other

than specified operating pressures specified in this General Order shall be identified on the utility's service area map.

California American Water has met all of the requirements under VII.6.D. for the exception, including that the customer has been informed and agreed in writing, the limited nature is recorded in a property deed restriction on the property and an amended service map. A copy of the Agreement Regarding Low Pressure Water Service ("Lower Pressure Agreement"), which is between California American Water and the proposed customer, is included with this advice letter as Attachment 1. The Map designating the area for lower pressure service, is included as attachment 3.

REQUEST

This advice letter requests Commission authorization pursuant to General Order 103-A VII.6.D. to serve the property identified in Exhibit A of the attached Lower Pressure Agreement at lower than 40 psi but above 20 psi. Service at that lower pressure is currently necessary because current system configuration and design cannot provide service above 40 psi.

Under General Order 103-A VII.6.D., "[a] water utility may furnish service to a customer at less than the pressure requirement specified in this General Order [i.e., 40 to 125 psi], if the customer is fully advised of the conditions under which service will be provided and a customer agreement is secured in writing." As is shown in the attached Lower Pressure Agreement, the customer has been fully advised of the conditions under which service will be provided and a written agreement has been secured.

Finally, General Order 103-A VII.6.D. states: "The limited nature of the service shall also be recorded as a deed restriction on the property" and "properties receiving service at other than specified operating pressures specified in this General Order shall be identified on the utility's service area map." As is indicated in the Lower Pressure Agreement, the customer shall deliver a copy of recorded deed restrictions within 30 days after receipt of notice the Commission grants authority for lower pressure service.

Based on the foregoing, California American Water respectfully requests authorization to, as is detailed in the Lower Pressure Agreement, serve the property in question at a lower pressure than is generally required by General Order 103-A.

SERVICE LIST

Pursuant to Section 4.3 of General Order No. 96-B, a copy of this advice letter is being sent to those entities listed in the attached service list. Copies of the detailed work papers and the documents supporting this Advice Letter have also been furnished to the Commission Staff.

EFFECTIVE DATE

California American Water submits this as a Tier 2 filing and requests an effective date of September 3, 2020.

RESPONSE OR PROTEST¹

Anyone may submit a response or protest for this AL. When submitting a response or protest, **please include the utility name and advice letter number in the subject line.**

¹ G.O. 96-B, General Rule 7.4.1

A **response** supports the filing and may contain information that proves useful to the Commission in evaluating the AL. A **protest** objects to the AL in whole or in part and must set forth the specific grounds on which it is based. These grounds² are:

1. The utility did not properly serve or give notice of the AL;
2. The relief requested in the AL would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
3. The analysis, calculations, or data in the AL contain material error or omissions;
4. The relief requested in the AL is pending before the Commission in a formal proceeding;
or
5. The relief requested in the AL requires consideration in a formal hearing, or is otherwise inappropriate for the AL process; or
6. The relief requested in the AL is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require relitigating a prior order of the Commission.

A protest may not rely on policy objections to an AL where the relief requested in the AL follows rules or directions established by statute or Commission order applicable to the utility. A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

DWA must receive a response or protest via email (**or** postal mail) within 20 days of the date the AL is filed. When submitting a response or protest, **please include the utility name and advice letter number in the subject line.**

The addresses for submitting a response or protest are:

Email Address:

Water.Division@cpuc.ca.gov

Mailing Address:

CA Public Utilities Commission
Division of Water and Audits
505 Van Ness Avenue
San Francisco, CA 94102

On the same day the response or protest is submitted to DWA, the respondent or protestant shall send a copy of the protest to California American Water at:

Email Address:

jonathan.morse@amwater.com

Mailing Address:

4701 Beloit Drive
Sacramento, CA 95838

sarah.leeper@amwater.com

555 Montgomery Street, Suite 816
San Francisco, CA 94111

Kamilah.Jones@amwater.com

4701 Beloit Drive
Sacramento, CA 95838

² G.O. 96-B, General Rule 7.4.2

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform DWA, within the 20 day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

REPLIES³

The utility shall reply to each protest and may reply to any response. Any reply must be received by DWA within five business days after the end of the protest period, and shall be served on the same day on each person who filed the protest or response to the AL.

The actions requested in this advice letter are not now the subject of any formal filings with the California Public Utilities Commission, including a formal complaint, nor action in any court of law.

This filing will not cause the withdrawal of service, nor conflict with other schedules or rules.

If you have not received a reply to your protest within 10 business days, please contact me at (916) 568-4255.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Kamilah Jones

Kamilah Jones

Sr Financial Analyst

³ G.O. 96-B, General Rule 7.4.3

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ADVICE LETTER 1306

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