

PRELIMINARY STATEMENT
(Continued)

Sheet 1

K. Chromium-6 Memorandum Account (Hexavalent Chromium) Memorandum Accounts (L)(D)

1. PURPOSE:

The purpose of the Sacramento Service Area Chromium-6 Memorandum Account is to track the incremental costs incurred to comply with the final Chromium-6 Maximum Contaminant Level (MCL) or drinking water standard adopted by the California Department of Public Health (CDPH). California-American Water Company (California American Water) may begin tracking incremental costs in these accounts once a final drinking water standard is adopted by the CDPH and may request recovery of the tracked costs through a one-time Tier 3 advice letter per district, or through its next GRC, according to the procedures described below. (T) (D)(T)

2. APPLICABILITY:

Applicable to the Sacramento Service Area, including the Dunnigan service area. The Sacramento Service Area Chromium-6 memo account is to remain open per Resolution W-5212. (T) (D)

3. RATES:

The Sacramento Service Area Chromium-6 Memorandum Account has no rate component. (D)(T)

4. ACCOUNTING PROCEDURE:

After a final drinking water standard for Chromium-6 is adopted by the CDPH, California American Water shall make the entries described below. The "incremental costs" that may be tracked in these accounts include: engineering, design, permitting, construction, capital carrying, labor, overhead, operations and maintenance, one-time and ongoing operational and monitoring expenditures for treatment most suited to a particular site or sites; potential acquisition expenditures of purchasing land to construct treatment facilities, and/or expenditures related to well abandonment as a cost-effective strategy for compliance, and capital related costs (including return on investment, income taxes, ad valorem tax, depreciation, and other taxes and fees) that are over and above those that the Commission has approved for recovery through base rates. California American Water may not track in this memo account costs that can be reasonably forecasted for inclusion in California American Water's next general rate case application, to be filed in May 2016 (i.e. California American Water may not include in these memorandum accounts costs and revenue requirement expected to be incurred starting in January 1, 2018, the beginning of the GRC cycle following A.13-07-002).

- a. A debit or credit entry equal to incremental expenses for compliance with the final drinking water standard, as described above;
- b. A debit or credit entry equal to the incremental revenue requirement of each operationally in-service and closed to plant capital investment for compliance with the final drinking water standard (including return on investment, income taxes, ad valorem tax, depreciation, and other taxes and fees), as described above;
- c. A monthly debit or credit entry equal to the average balance in each segment of the account multiplied by 1/12th of the most recent month's interest rate on Commercial Paper (prime, 90-day) published in the Federal Reserve Statistical Release H-15.
- d. Account balances will be amortized as part of a general rate case or via advice letter, at the Company's discretion, per Standard Practice U-27-W.

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(TO BE INSERTED BY UTILITY)		ISSUED BY	(TO BE INSERTED BY C.P.U.C.)	
Advice	1280-A	J. T. LINAM	Date Filed	<u>06/22/2020</u>
Decision		DIRECTOR - Rates & Regulatory	Effective	<u>02/10/2020</u>
			Resolution	_____

PRELIMINARY STATEMENT
(Continued)

Sheet 2

K. Chromium-6 Memorandum Account (Hexavalent Chromium) Memorandum Account (continued): (D)(T)

5. EFFECTIVE DATE:

The Chromium-6 Memorandum Account is effective the date the California Department of Public Health's final Chromium-6 drinking water standard regulation is approved by the Office of Administrative Law. (D)(T)

6. REGULATORY PROCEDURE:

- a. Required justifications: For each capital project, California American Water will provide detailed justifications that contain least-cost analyses considering all feasible alternatives, including but not limited to blending, removing the well from active status, and Best Available Technologies ("BATs") for chromium-6 treatment as specified in Title 22, California Code of Regulations. The need to maintain the affected well's active status, thus requiring capital investment, must be supported with consideration of the district's available water supply resources, including new supply projects authorized in the 2013 GRC.
- b. For recovery through an advice letter: California American Water may only file one Tier 3 advice letter per district. When the last capital project in a district is nearing completion (operationally in-service and closed to plant), approximately one month before an advice letter seeking recovery is filed, California American Water will confer with the Office of Ratepayer Advocates to alert it of the advice letter filing, and begin providing the data supporting both the capital projects and expenses in the memo accounts for which recovery will be requested. The advice letter will request (a) inclusion of the revenue requirements for the authorized projects in rates going forward, and (b) a surcharge to recover the incremental revenue requirement and expenses tracked in the memo accounts.
- c. For recovery in a GRC: To the extent that incremental Chromium-6 costs are not included in the beginning plant balance for the next GRC, or are not otherwise recovered, California American Water may request cost recovery in the next GRC. In that event, California American Water shall note the request in the Chromium-6 Memorandum Account for tracking purposes. (D)(T)

(Continued)

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