STATE OF CALIFORNIA GAVIN NEWSOM, Governor

#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



May 20, 2019

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. 1200-A (Supplement to Advice Letter No. 1200), filed on February 26, 2019, regarding authorization to recover expenses from the Conservation Rationing Memorandum Account to the Larkfield Consolidated Expense Balancing Account (CEBA) for the Larkfield County District.

Enclosed are copies of the following revised tariff sheets for the utility's files:

P.U.C.	
Sheet No.	Title of Sheet
8932-W	Schedule No. LK-1 (continued), Larkfield Tariff Area
	General Metered Service
8933-W	Table of Contents, (Page 2)
8934-W	Table of Contents, (Page 1)

Please contact Jim Boothe at 415-703-1748, if you have any questions.

Thank you,

#### /s/ROBIN BRYANT

Robin Bryant Water & Sewer Advisory Branch Water Division

**Enclosures** 

## CALIFORNIA PUBLIC UTILITIES COMMISSION DIVISION OF WATER AND AUDITS

### **Advice Letter Cover Sheet**

Date Mailed to Service List: February 26, 2019

Protest Deadline (20th Day): March 13, 2019

Review Deadline (30<sup>th</sup> Day): March 23, 2019

Requested Effective Date: March 1, 2019

Rate Impact: \$See AL

**Utility Name:** California American Water

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CPUC Utility #: U210W

Advice Letter #: 1200-A

Tier

Authorization W-5186

**District:** Larkfield County District

 $\square$ 3

 $\square$  Compliance

Description:	The purpose of this supplemental advice letter to recover expenses the Conservation/Ration Memorandum Account ("CRMA") to CEBA \$138,110 for Larkfield District.	er is ning	See AL%
	line for this advice letter is 20 days from the of section in the advice letter for more informa		was mailed to the service list. Please
Utility Contact:	Kamilah Jones	<b>Utility Contact:</b>	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 OI	NLY	
<u>DATE</u>	STAFF	<u>CO</u>	MMENTS
			_
[ ] APPROVED	[ ]WITHDE	AWN	[ ] REJECTED
Signature:	Commo	ents:	





February 26, 2019

ADVICE LETTER NO. 1200-A

#### TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

California-American Water Company (California American Water) (U210W) hereby submits for review this advice letter, including the following tariff sheets applicable to all of its districts, which are attached hereto:

C.P.U.C. Sheet No.	Title of Sheet	Canceling Sheet No.
8932-W	Schedule No. LK-1 (continued) Larkfield Tariff Area GENERAL METERED SERVICE	8791-W
8933-W	TABLE OF CONTENTS (Page 2)	8930-W
8934-W	TABLE OF CONTENTS (Page 1)	8931-W

#### Purpose:

This supplemental advice letter is being filed to comply with Resolution W-5186, authorizing California American Water Company to recover expenses from the Conservation Rationing Memorandum Account to the Larkfield Consolidated Expense Balancing Account (CEBA).

The purpose of this advice letter is to request authority to recover expenses from March 13, 2014 to July 31, 2017 tracked in the Conservation/Rationing Memorandum Account ("CRMA") due to Rule 14.1 and/or Schedule 14.1 for Voluntary and Mandatory Conservation in the amount of \$138,488 for Larkfield District. California American Water request to recuperate in expenses from the CRMA for the California American Water service district of Larkfield into the Consolidated Expense Balancing Account ("CEBA").

#### **Background:**

- January 17, 2014 Governor of State of California declared State of Emergency in California due to severe drought conditions
- August 15, 2014 In Advice Letter 1047, 1048 and 1049, California American Water requested authority to activate the "Conservation/Rationing Memorandum Account" in all its districts in accordance with Resolution W-4976 to track incremental costs related to implementing the requirements of Rule 14 and Schedule 14.1. The Commission

- approved the Advice letters on August 25, 2014, with an effective date of March 13, 2014 for AL 1047 and 1048 and an effective date of August 25, 2014 for AL 1049.
- April 25, 2014 Governor of State of California issued an Executive Order to strengthen
  the State's ability to manage water and habitat effectively in drought conditions, and call
  on all Californians to redouble their efforts to conserve water.
- May 5, 2015 the SWRCB issued an Emergency Regulation due to continuing drought conditions with specific water use reductions, by service area, and prohibitions on how end-use customers can use potable water to achieve a statewide 25% reduction in usage as compared with the amount used in 2013 (through February 2016).
- May 21, 2015 AL 1077-A, filed through Tariff Schedule 14.1, California American Water
- November 13, 2015 Governor of the State of California issued another Executive
  Order that directed the Water Board to, if drought conditions persist through January
  2016, extend until October 31, 2016 restrictions to achieve a statewide reduction in
  potable water usage.
- On February 2, 2016 Water Board adopted an extended and revised Emergency Regulation due to continuing drought conditions.
- May 18, 2016 Water Board approved updated Emergency Regulation that extends emergency regulation through January 2017 with specific modifications, the most significant of these being the creation of a self-certification process for all utilities to identify required reductions based on supply need for a 3 year period.

#### **Discussion:**

California American Water has been offering leading conservation programs to its customers to achieve water savings and water wise behaviors and has further expanded its programs during the California drought of 2011 through 2016. In May of 2015 the company activated the Conservation/Rationing Memorandum Account to track all drought related expenses incurred during the drought to comply with the State's Drought Emergency orders.

#### Request:

From 2014 through 2017, California American Water in the Larkfield District incurred \$138,488 to help meet the statewide implemented water use reduction targets in each service area and to implement the SWRCB's water use prohibitions. These costs included ongoing drought communications and water use education and the employment of customer service employees (mostly temporary) dedicated to the drought situation.

The California Public Utilities Commission (Commission) adopted Resolution W-4976 on February 27, 2014 which revised the drought procedures for water conservation, rationing and service connection moratoria enumerated in Standard Practice U-40-W. Cal-Am requests to recover \$138,488 including interest from the Conservation/Rationing Memorandum Account (CRMA) balance to the Larkfield CEBA will be recovered through a quantity based surcharge of \$0.393 per 100 gallons over 24 months upon effective date.

Resolution W-4976 states that:

Memorandum accounts to track expenses and monies collected by the utility through water use violation fines must be requested through an advice letter, either in conjunction with an advice letter requesting adding Rule 14.1 or Schedule 14.1, or in a stand-alone advice letter.

Paragraph 37 in Resolution W-4976, states that:

The tracking of lost revenues as a result of conservation efforts in a lost revenue memorandum account is tied to the utility having Rule 14.1 or Schedule 14.1 in its tariffs and having activated either Rule 14.1 or Schedule 14.1.

Copies of detailed workpapers and supporting documents for this Advice Letter

#### Tier Designation:

This advice letter is submitted with a Tier 1 designation pursuant to General Order No. 96-B.

#### **Effective Date:**

California American requests an effective date of February 26, 2019.

#### **Protests and Responses:**

Anyone may respond to or protest this advice letter. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter.

A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

- (1) The utility did not properly serve or give notice of the advice letter;
- (2) The relief requested in the advice letter 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 advice letter contain material errors or omissions;
- (4) The relief requested in the advice letter is pending before the Commission in a formal proceeding; or
- (5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
- (6) The relief requested in the advice letter 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 shall provide citations or proofs where available to allow staff to properly consider the protest.

A response or protest must be made in writing or by electronic mail and must be received by the Water Division within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

> Tariff Unit, Water Division, 3<sup>rd</sup> floor California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102 water\_division@cpuc.ca.gov

In the same date the response or protest is submitted to the Water Division, the respondent or protestant shall send a copy by mail (or e-mail) to us, addressed to:

E-Mail: Recipients: Mailing Address: Kamilah U Jones Kamilah.Jones@amwater.com 4701 Beloit Drive Financial Analyst - Rates & Sacramento, CA 95838 Regulatory Fax: (916) 568-4260 Sarah E. Leeper sarah.leeper@amwater.com 333 Haves Street Vice President - Legal, San Francisco, CA 94102 Regulatory Fax: (415) 863-0615 CA Rates Ca.Rates@amwater.com 4701 Beloit Drive Sacramento, CA 95838 Fax: (916) 568-4260

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division, 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.

If you have not received a reply to your protest within 10 business days, contact this person at (916) 568-4222.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Kamilah Jones

Kamilah Jones Financial Analyst - Rates & Regulatory CALIFORNIA-AMERICAN WATER COMPANY

San Diego, CA 92101

655 W. Broadway, Suite 1410

Revised Cancelling Revised Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No. 8932-W 8791-W

(C)

#### Schedule No. LK-1 Larkfield District Tariff Area GENERAL METERED SERVICE

Sheet 3

#### SPECIAL CONDITIONS

#### General Items:

- 1. Qualifying low-income customers can receive a discount on their bill. Customers must apply with the Company for acceptance into the low-income program. For additional details, please see Tariff Schedule CA-LIRA.
- 2. Any customer paying for service at a premise where a Residential Fire Protection Service (RFPS) is required/requested to be installed by local fire and building codes shall be allowed to have their monthly service charge modified in accordance with the monthly costs for RFPS service charges. Provided, however, that the RFPS rate has been requested by the customer and verified by the Company that the smaller size of meter would be large enough to provide adequate service for the property in absence of the additional demand necessary to supply water to the sprinkler system. The RFPS will not be considered a fire service by the Company, but as an oversized general metered service. As such the rules and conditions of service for general metered service shall apply.

#### Fees and Surcharges:

- 1. All bills are subject to the reimbursement fee set forth in Schedule No. UF.
- 2. A surcharge is included on each bill to collect franchise fees and/or business license fees paid to the County of Sonoma. The amount collected is based on a percentage of the gross revenues of each bill. The percentage is as follows: Larkfield Franchise Fee - 1.00%
- 3. Per Advice Letter 1072-B, a surcharge of \$0.0120 per 100 gallons will be applied to each bill to fund conservation efforts. The surcharge will remain in effect until otherwise directed by the Commission.
- 4. Per Advice Letter 1137-A, a surcharge of \$1.21 for the Low-Income Ratepayer Assistance Program ("LIRAP") Balancing Account will be collected from all non-low income water and Wastewater customers.
- 5. Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA) Surcharge
  - a. A surcharge is included in each bill to recover the net under-collection in the Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA). For the period ending December 31, 2017, the net under-collection totals \$1,224,021 including interest. The surcharge is \$0.1069 per 100 gallons and will remain effective for 36 months beginning March 31, 2018.
- 6. Per Advice Letter 1200-A, the under-collected balance in the Larkfield District Consolidated Expense Balancing Account (CEBA) will be recovered through a quantity based surcharge of \$0.0393 per 100 gallons over 24 months effective February 26, 2019. The total amount will be (R)(C) recovered from all classes of customers.

(Continued)

(TO BE INSERTED BY UTILITY) ISSUED BY (TO BE INSERTED BY C.P.U.C.) Advice 1200-A J. T. LINAM Date Filed 02/26/2019 Decision **DIRECTOR** - Rates & Regulatory Effective 02/26/2019 Resolution

CALIFORNIA-AMERICAN WATER COMPANY

San Diego, CA 92101

655 W. Broadway, Suite 1410

(TO BE INSERTED BY UTILITY)

1200-A

Advice

Decision

Cancelling

Revised Revised Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

8933-W 8930-W

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(TO BE INSERTED BY C.P.U.C.)

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(Continued)					

ISSUED BY

J. T. LINAM

DIRECTOR - Rates & Regulatory

655 W. Broadway, Suite 1410

San Diego, CA 92101

Decision

Cancelling

Revised Revised

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

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(TO BE INSERTED BY UTILITY) Advice 1200-A Decision	ISSUED BY J. T. LINAM DIRECTOR - Rates & Regulatory	(TO BE INSERTED BY C.P.U.C.)  Date Filed  02/26/2019  Effective 02/26/2010

DIRECTOR - Rates & Regulatory

Effective

Resolution

02/26/2019

# LARKFIELD DISTRICT SERVICE LIST CALIFORNIA-AMERICAN WATER COMPANY ADVICE LETTER 1200-A

BY MAIL:

Sarah E. Leeper

California American Water 555 Montgomery St, Suite 816 San Francisco, CA 94111

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Penngrove/Kenwood Water Co

Mario Gonzalez

Guerneville 95446

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