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VIA E-MAIL & U.S. MAIL

November 23, 2010

Hon. Hallie Yacknin
Administrative Law Judge
California Public Utilities Commission
505 Van Ness Avenue, Room 5005
San Francisco, CA 94102

Re: Comments of California Water Association on Draft Resolution ALJ-260

Your Honor:

California Water Association ("CWA") is an association of investor-owned water utilities subject to the Commission's regulation and represents those companies in policy development and rulemaking proceedings before the Commission. CWA files these comments on behalf of its member utilities, which also participate regularly in Commission proceedings.

CWA supports the numerous changes in the Commission's Rules of Practice and Procedure ("Rules") proposed in Resolution ALJ-260, including the proposed revisions to Rule 1.5 regarding the form and size of tendered documents. CWA is, however, concerned that the proposed restrictions on the type size (no less than 12-point) and page margins in Rule 1.5 will limit the ability of parties submitting certain documents, subject to page limits, from adequately addressing issues of concern. CWA respectfully proposes that such page limits be adjusted to avoid such an undesirable result.

In particular, Rule 14.3 regarding comments on proposed or alternate decisions limits opening comments to 15 pages, except that in certain classes of proceeding up to 25 pages are allowed, and the Rule limits reply comments in all cases to five pages. Those page limits already impose substantial constraints on parties' ability to address relevant issues in many cases, even though they frequently and routinely file pleadings in 10-point type. The requirement to use no less than 12-point type will, in many cases, significantly reduce parties' ability to present their views and concerns about proposed decisions and to reply meaningfully to the comments of other parties.

Accordingly, CWA proposes that the increased type-size requirement of proposed Rule 1.5 be accompanied by proportionate increases in the page limits specified in Rule 14.3.



Specifically, CWA proposes that the 15 and 25-page limits for comments be increased to 18 and 30 pages, respectively, and that the five-page limit for reply comments be increased to six pages.

Respectfully submitted,

A handwritten signature in cursive script that reads "Martin A. Mattes".

Martin A. Mattes
of Nossaman LLP

MAM/

cc (by e-mail): Thomas F. Smegal, California Water Service Company
John K. Hawks, California Water Association
Rules Update Listserv