

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

Advice Letter Cover Sheet

Utility Name: California American Water
District: All Districts
CPUC Utility #: U210W
Advice Letter #: 1391
Tier 1 2 3 Compliance
Authorization D. 22-03-022
Description: Intervenor Compensation for Pacific Institute

Date Mailed to Service List: November 11, 2022
Protest Deadline (20th Day): December 1, 2022
Review Deadline (30th Day): December 11, 2022
Requested Effective Date: December 11, 2022
Rate Impact: \$See AL
See AL%

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: Leana Ramirez
Phone: 916-568-4279
Email: Leana.ramirez@amwater.com

Utility Contact: Jonathan Morse
Phone: 916-568-4237
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

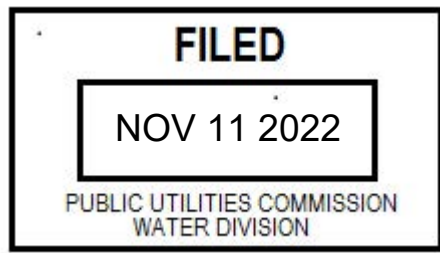
WITHDRAWN

REJECTED

Signature: _____

Comments: _____

Date: _____



520 Capitol Mall, Suite 630
Sacramento, CA 95814
www.amwater.com

P (916)-568-4279

November 11, 2022

ADVICE LETTER NO. 1391

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

California-American Water Company (California American Water) (U210W) submits this advice letter, including the following attached tariffs applicable to all districts:

Purpose:

This advice letter filing requests recovery of intervenor compensation awarded to Pacific Institute.

Background:

In Decision (“D.”) 22-03-022, Pacific Institute was awarded compensation for its contribution in connection with D.20-08-047, which resolves Phase I issues in Rulemaking 17-06-024.

In D.22-03-022, the Commission granted Pacific Institute’s compensation request as follows:

1. *Pacific Institute shall be awarded \$19,420.*
2. *Within 30 days of the effective date of this decision, California-American Water Company shall pay Pacific Institute for Studies in Development, Environment, and Security the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 6, 2021, the 75th day after the filing of Pacific Institute’s request, and continuing until full payment is made.¹*
3. *California Water Service Company shall invoice the other Class A water companies for their respective shares of the award, based on their California-jurisdictional 2018 jurisdictional water revenues for the 2018 calendar year within 30 days of the effective date of this decision. Within 15 days of invoice, California-American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos), Liberty Utilities (Park Water), San Gabriel Valley Water Company, San Jose Water Company, and Suburban Water Systems shall pay California Water Service Company their respective shares of the award, based on their California-jurisdictional 2018 jurisdictional water revenues for the 2018 calendar year, to reflect the year in which the proceeding was primarily litigated.*

¹ D.20-08-040, Para. 2, p. 17.

California Water Service Company confirmed that it made payment to the Center for Accessible Technology in compliance with Ordering Paragraph 1. California Water Association provided the allocation calculation for the Class A companies listed in Ordering Paragraph 3 above, including for California American Water, and collected payments to remit to California Water Service Company.

On October 18, 2022, California American Water issued a payment of \$2,291.96 which includes interest to Pacific Institute in accordance with D.22-03-022. One check for \$8,590.10 was issued to California Water Association which included payments for Pacific Institute and Center for Accessible Technology.

Request:

California American Water requests authorization to bill customers a meter surcharge to recover the \$2,291.96 compensation awarded to Pacific Institute, from all customer classes as ordered by D.22-03-022.

Tier Designation:

These tariffs are submitted pursuant to General Order No.96-B and this advice letter is submitted with a Tier 2 designation.

Effective Date:

California American Water requests an effective date of December 11, 2022.

NOTICE:

Pursuant to Section 4.3 of General Order No. 96-B, a copy of this advice letter is being provided to those entities listed in the attached "SERVICE LIST PURSUANT TO SECTION 4.3 OF G.O. NO. 96-B." Per guidance from the California Public Utilities Commission's Water Division, during the COVID-19 pandemic, advice letters will only be delivered electronically to the service list.

PROTEST OR RESPONSES:

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.**

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

² G.O. 96-B, General Rule 7.4.2

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.
7. 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:

leana.ramirez@amwater.com

Mailing Address:

520 Capitol Mall, Suite 630
Sacramento, CA 95838

sarah.leeper@amwater.com

555 Montgomery Street, Suite 816
San Francisco, CA 94111

jonathan.morse@amwater.com

520 Capitol Mall, Suite 630
Sacramento, CA 95838

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.

REPLIES

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) 568-4279.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Leana Ramirez

Leana Ramirez
Business Support Specialist – Rates & Regulatory

Cal P.U.C. Sheet No.	Title of Sheet	
XXXXX-W	Schedule No. CEN-SAT Central Satellite Tariff Area GENERAL METERED SERVICE Sheet 91	
XXXXX-W	Schedule No. MO-1C GENERAL METERED SERVICE in the Monterey Service Area Tariff Area NON-RESIDENTIAL CUSTOMERS Sheet 91	
XXXXX-W	Schedule No. MO-1-MF GENERAL METERED SERVICE in the Monterey Service Area Tariff Area MULTI-FAMILY RESIDENTIAL CUSTOMERS Sheet 91	
XXXXX-W	Schedule No. MO-1O GENERAL METERED SERVICE in the Monterey Service Area Tariff Area OTHER CUSTOMERS Sheet 91	
XXXXX-W	Schedule No. MO-1-SF GENERAL METERED SERVICE in the Monterey Service Area Tariff Area SINGLE FAMILY RESIDENTIAL CUSTOMERS Sheet 91	
XXXXX-W	Schedule No. ND-1 Northern Division Tariff Area GENERAL METERED SERVICES Sheet 91	
XXXXX-W	Schedule No. SOU-1 Southern Division Tariff Area GENERAL METERED SERVICES Sheet 91	

655 W. Broadway, Suite 1410

San Diego, CA 92101

Schedule No. CEN-SAT
 Central Satellite Tariff Area
GENERAL METERED SERVICE

Sheet 91

CENTRAL SATELLITE SERVICE AREA

SPECIAL CONDITIONS:

Fees & Surcharges (continued):

Intervenor Compensation Surcharges

- Per Decision D.22-03-022, intervenor compensation paid to Pacific Institute will be recovered through a meter surcharge for one billing cycle upon approval of Advice Letter 1391. The total amount of \$2,319.06 will be recovered from all classes of metered customers. Chualar customers are excluded from this surcharge.

Meter Size	Surcharge
5/8 x 3/4	\$0.01
3/4	\$0.01
1	\$0.02
1 1/2	\$0.04
2	\$0.07
3	\$0.12
4	\$0.20
6	\$0.41
8	\$0.65
10	\$0.94
12	\$1.35

(Continued)

(TO BE INSERTED BY UTILITY)

Advice 1391
 Decision

ISSUED BY

J. T. LINAM
 DIRECTOR - Rates & Regulatory

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

Date Filed _____
 Effective _____
 Resolution _____

655 W. Broadway, Suite 1410

San Diego, CA 92101

Schedule No. MO-1C
 GENERAL METERED SERVICE in the Monterey Service Area Tariff Area
NON-RESIDENTIAL CUSTOMERS

Sheet 91

MONTEREY SERVICE AREA

SPECIAL CONDITIONS:

Fees & Surcharges (continued):

Intervenor Compensation Surcharges

1. Per Decision D.22-03-022, intervenor compensation paid to Pacific Institute will be recovered through a meter surcharge for one billing cycle upon approval of Advice Letter 1391. The total amount of \$2,319.06 will be recovered from all classes of metered customers.

Meter Size	Surcharge
5/8 x 3/4	\$0.01
3/4	\$0.01
1	\$0.02
1 1/2	\$0.04
2	\$0.07
3	\$0.12
4	\$0.20
6	\$0.41
8	\$0.65
10	\$0.94
12	\$1.35

(Continued)

(TO BE INSERTED BY UTILITY)

Advice 1391
 Decision

ISSUED BY

J. T. LINAM
 DIRECTOR - Rates & Regulatory

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

Date Filed _____
 Effective _____
 Resolution _____

655 W. Broadway, Suite 1410

San Diego, CA 92101

Schedule No. MO-1-MF
 GENERAL METERED SERVICE in the Monterey Service Area Tariff Area
MULTI-FAMILY RESIDENTIAL CUSTOMERS

Sheet 91

MONTEREY SERVICE AREA

SPECIAL CONDITIONS:

Fees & Surcharges (continued):

Intervenor Compensation Surcharges

1. Per Decision D.22-03-022, intervenor compensation paid to Pacific Institute will be recovered through a meter surcharge for one billing cycle upon approval of Advice Letter 1391. The total amount of \$2,319.06 will be recovered from all classes of metered customers.

Meter Size	Surcharge
5/8 x 3/4	\$0.01
3/4	\$0.01
1	\$0.02
1 1/2	\$0.04
2	\$0.07
3	\$0.12
4	\$0.20
6	\$0.41
8	\$0.65
10	\$0.94
12	\$1.35

(Continued)

(TO BE INSERTED BY UTILITY)

Advice 1391
 Decision

ISSUED BY

J. T. LINAM
 DIRECTOR - Rates & Regulatory

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

Date Filed _____
 Effective _____
 Resolution _____

655 W. Broadway, Suite 1410

San Diego, CA 92101

Schedule No. MO-10
 GENERAL METERED SERVICE in the Monterey Service Area Tariff Area
OTHER CUSTOMERS

Sheet 91

MONTEREY SERVICE AREA

SPECIAL CONDITIONS:

Fees & Surcharges (continued):

Intervenor Compensation Surcharges

1. Per Decision D.22-03-022, intervenor compensation paid to Pacific Institute will be recovered through a meter surcharge for one billing cycle upon approval of Advice Letter 1391. The total amount of \$2,319.06 will be recovered from all classes of metered customers.

Meter Size	Surcharge
5/8 x 3/4	\$0.01
3/4	\$0.01
1	\$0.02
1 1/2	\$0.04
2	\$0.07
3	\$0.12
4	\$0.20
6	\$0.41
8	\$0.65
10	\$0.94
12	\$1.35

(Continued)

(TO BE INSERTED BY UTILITY)

Advice 1391
 Decision

ISSUED BY

J. T. LINAM
 DIRECTOR - Rates & Regulatory

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

Date Filed _____
 Effective _____
 Resolution _____

655 W. Broadway, Suite 1410

San Diego, CA 92101

Schedule No. MO-1-SF
 GENERAL METERED SERVICE in the Monterey Service Area Tariff Area
SINGLE FAMILY RESIDENTIAL CUSTOMERS

Sheet 91

MONTEREY SERVICE AREA

SPECIAL CONDITIONS:

Fees & Surcharges (continued):

Intervenor Compensation Surcharges

1. Per Decision D.22-03-022, intervenor compensation paid to Pacific Institute will be recovered through a meter surcharge for one billing cycle upon approval of Advice Letter 1391. The total amount of \$2,319.06 will be recovered from all classes of metered customers.

Meter Size	Surcharge
5/8 x 3/4	\$0.01
3/4	\$0.01
1	\$0.02
1 1/2	\$0.04
2	\$0.07
3	\$0.12
4	\$0.20
6	\$0.41
8	\$0.65
10	\$0.94
12	\$1.35

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(TO BE INSERTED BY UTILITY)

Advice 1391
 Decision

ISSUED BY

J. T. LINAM
 DIRECTOR - Rates & Regulatory

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

Date Filed _____
 Effective _____
 Resolution _____

655 W. Broadway, Suite 1410

San Diego, CA 92101

Schedule No. ND-1
Northern Division Tariff Area
GENERAL METERED SERVICES

Sheet 91

NORTHERN DIVISION SERVICE AREA

SPECIAL CONDITIONS:

Fees & Surcharges (continued):

Intervenor Compensation Surcharges

1. Per Decision D.22-03-022, intervenor compensation paid to Pacific Institute will be recovered through a meter surcharge for one billing cycle upon approval of Advice Letter 1391. The total amount of \$2,319.06 will be recovered from all classes of metered customers. Fruitridge Vista customers are excluded from this surcharge.

Meter Size	Surcharge
5/8 x 3/4	\$0.01
3/4	\$0.01
1	\$0.02
1 1/2	\$0.04
2	\$0.07
3	\$0.12
4	\$0.20
6	\$0.41
8	\$0.65
10	\$0.94
12	\$1.35

(Continued)

(TO BE INSERTED BY UTILITY)

Advice 1391
Decision

ISSUED BY

J. T. LINAM
DIRECTOR - Rates & Regulatory

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

Date Filed _____
Effective _____
Resolution _____

655 W. Broadway, Suite 1410

San Diego, CA 92101

Schedule No. SOU-1
 Southern Division Tariff Area
GENERAL METERED SERVICES

Sheet 91

SOUTHERN DIVISION SERVICE AREA

SPECIAL CONDITIONS:

Fees & Surcharges (continued):

Intervenor Compensation Surcharges

- Per Decision D.22-03-022, intervenor compensation paid to Pacific Institute will be recovered through a meter surcharge for one billing cycle upon approval of Advice Letter 1391. The total amount of \$2,319.06 will be recovered from all classes of metered customers.

Meter Size	Surcharge
5/8 x 3/4	\$0.01
3/4	\$0.01
1	\$0.02
1 1/2	\$0.04
2	\$0.07
3	\$0.12
4	\$0.20
6	\$0.41
8	\$0.65
10	\$0.94
12	\$1.35

(Continued)

(TO BE INSERTED BY UTILITY)

Advice 1391
 Decision

ISSUED BY

J. T. LINAM
 DIRECTOR - Rates & Regulatory

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

Date Filed _____
 Effective _____
 Resolution _____

ALL DISTRICTS SERVICE LIST
CALIFORNIA-AMERICAN WATER COMPANY

BY MAIL:

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City of Bradbury
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City Hall
California & Sylvan Avenues
Sand City, CA 93955
Attn: City Clerk

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Monterey County DPW
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Sacramento, CA 95812

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Temple City, CA 91780

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Attn: City Attorney

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ALL DISTRICTS SERVICE LIST
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Santa Rosa, CA 95409

Will and Carol Surman
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Monterey, CA 93940

City of Thousand Oaks Water Dept.
2100 E. Thousand Oaks Blvd.
Thousand Oaks, CA 91362

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City Clerk
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Monrovia, CA 91016

Don Jacobson
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Woodside, CA 94062-1210

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Rio Linda, CA 95673

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City Clerk
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Rosemead, CA 91770

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Salinas, CA 93901

Sacramento Suburban Water District
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Sacramento, CA 95821-5303

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County of Monterey
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Salinas, CA 93902

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California Public Utilities Commission
dra_water_al@cpuc.ca.gov

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Christina Baker, City Clerk
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ALL DISTRICTS SERVICE LIST
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Chief Financial Officer
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dadellosa@sgvwater.com

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brai@cityofinglewood.org

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suemadura@sbcglobal.net

City of Sacramento, Water Division
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Cliff Finley, PE
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John K. Hawks
Executive Director
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Marvin Philo
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ALL DISTRICTS SERVICE LIST
CALIFORNIA-AMERICAN WATER COMPANY

Florin County Water District
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Sacramento, CA 95829
fcwd@sbcglobal.net

George Riley
Citizens for Public Water
1198 Castro Road
Monterey, CA 91940
georgetriley@gmail.com

City of Del Rey Oaks
City Hall
650 Canyon Del Rey Road
Del Rey Oaks, CA 93940
Attn: City Clerk
citymanager@delreyoaks.org
kminami@delreyoaks.org

David C. Laredo and Fran Farina
Attorneys at Law
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dave@laredolaw.net

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Chief Deputy City Clerk
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CALIFORNIA-AMERICAN WATER COMPANY
SUPPORTING DOCUMENTATION FOR STAFF

All Districts - Intervenor Compensation to Pacific Institute
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CALIFORNIA AMERICAN WATER COMPANY			
Class A Water Companies			
Pacific Institute* Compensation: \$19,420 - D.22-03-022; For Contributions to D.20-08-047			
WORKPAPER 1-1			
			Pacific Institute
	Jurisdictional		Compensation
Water Utility	Revenues	% of Total	Amount
	2018		Per Company
California American Water	\$ 218,296,426	11.78%	\$ 2,291.96
California Water Service	\$ 656,939,209	35.44%	\$ 6,897.41
Golden State Water	\$ 293,379,731	15.83%	\$ 3,080.28
Great Oaks Water Company	\$ 19,168,770	1.03%	\$ 201.26
Liberty Utilities	\$ 58,305,330	3.15%	\$ 612.17
San Gabriel Valley Water	\$ 155,567,979	8.39%	\$ 1,633.36
San Jose Water	\$ 369,843,456	19.95%	\$ 3,883.10
Suburban Water Systems	\$ 81,985,626	4.42%	\$ 860.79
Total	\$ 1,853,486,527	100.00%	\$ 19,460.33

CALIFORNIA AMERICAN WATER COMPANY
Pacific Institute for Studies in Development, Environment & Security Payment
WORKPAPER 1-2

	Interest Rate** %/ 100	Authorized Amt (a)	Interest (b)	Sum of Interst (c) = sum of (b)	Sum (d)=(c6)+(e)
January-21	0.10%	\$ 19,420.00	\$ 1.62	\$ 1.62	\$ 19,421.62
February-21	0.08%		\$ 1.29	\$ 2.91	\$ 19,422.91
March-21	0.08%		\$ 1.29	\$ 4.20	\$ 19,424.20
April-21	0.06%		\$ 0.97	\$ 5.17	\$ 19,425.17
May-21	0.05%		\$ 0.81	\$ 5.98	\$ 19,425.98
June-21	0.05%		\$ 0.81	\$ 6.79	\$ 19,426.79
July-21	0.06%		\$ 0.97	\$ 7.76	\$ 19,427.76
August-21	0.06%		\$ 0.97	\$ 8.73	\$ 19,428.73
September-21	0.06%		\$ 0.97	\$ 9.70	\$ 19,429.70
October-21	0.06%		\$ 0.97	\$ 10.67	\$ 19,430.67
November-21	0.08%		\$ 1.30	\$ 11.97	\$ 19,431.97
December-21	0.13%		\$ 2.11	\$ 14.08	\$ 19,434.08
January-22	0.15%		\$ 2.43	\$ 16.51	\$ 19,436.51
February-22	0.21%		\$ 3.40	\$ 19.91	\$ 19,439.91
March-22	0.63%		\$ 10.21	\$ 30.12	\$ 19,450.12
April-22	0.63%		\$ 10.21	\$ 40.33	\$ 19,460.33

\$ 19,420.00 \$ 40.33 **\$ 19,460.33 Total payment with**

**FRS - 3 month non-financial commercial paper rate

**CALIFORNIA AMERICAN WATER COMPANY
PACIFIC INSTITUTE
INTERVENOR COST AS A % OF REVENUE
WORKPAPER 1-3**

Intervenor Compensation Cost Recovery

Pacific Institute	\$	2,287.21
Interest	\$	<u>4.75</u>

Total Payment	\$	2,291.96
---------------	----	----------

Current Authorized Revenue

Northern Division	\$	71,542,272
Central Division	\$	73,840,036
Southern Division	\$	<u>123,353,416</u>
Total Authorized Revenue	\$	268,735,724

% Increase		0.001%
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CALIFORNIA-AMERICAN WATER COMPANY
 NORTHERN, CENTRAL, AND SOUTHERN DIVISIONS
 TOTAL METER SURCHARGE CALCULATION
 WORKPAPER 1-4

Description			
1	Average Customers by Meter Size	5/8 x 3/4	140,484
2		3/4	2,621
3		1	23,072
4		1 1/2	4,100
5		2	5,214
6		3	236
7		4	226
8		6	80
9		8	34
10		10	4
11		12	0
12		TOTAL Average Customers	176,071
13			
14	Meter Equivalents by Meter Size	5/8 x 3/4	1.0
15		3/4	1.5
16		1	2.5
17		1 1/2	5.0
18		2	8.0
19		3	15.0
20		4	25.0
21		6	50.0
22		8	80.0
23		10	115.0
24		12	165.0
25			
26	Total Meter Equivalents	5/8 x 3/4	140,484
27		3/4	3,932
28		1	57,680
29		1 1/2	20,500
30		2	41,712
31		3	3,540
32		4	5,650
33		6	4,000
34		8	2,720
35		10	460
36		12	0
37		TOTAL	280,678
38			
39	Total Revenue Necessary		\$2,291.96
40			
41	Cost per Meter Equivalent		\$0.01
42			
43	Monthly Meter Equivalent Cost		\$0.01
44			
45			
46			
47	<u>SURCHARGE RATE BY METER SIZE</u>		
48		5/8 x 3/4	\$0.01
49		3/4	\$0.01
50		1	\$0.02
51		1 1/2	\$0.04
52		2	\$0.07
53		3	\$0.12
54		4	\$0.20
55		6	\$0.41
56		8	\$0.65
57		10	\$0.94
58		12	\$1.35
59			
60	<u>PROOF OF SERVICE CHARGE REVENUES</u>		
61	check	5/8 x 3/4	\$1,147
62		3/4	\$32
63		1	\$471
64		1 1/2	\$167
65		2	\$341
66		3	\$29
67		4	\$46
68		6	\$33
69		8	\$22
70		10	\$4
71		12	\$0
72		Meter Size Surcharge	\$2,292
73			
74		Variance	\$0

**CALIFORNIA-AMERICAN WATER COMPANY
NORTHERN DIVISION
METER SERVICE COUNT
ADVICE LETTER 1356
WORKPAPER 1-5**

			AL 1356
Description			
1 .	Average Customers by Meter Size	5/8 x 3/4	56,578
2 .		3/4	1,764
3 .		1	4,147
4 .		1 1/2	1,011
5 .		2	1,992
6 .		3	24
7 .		4	92
8 .		6	24
9 .		8	8
10 .		10	1
11 .		12	0
12 .	TOTAL Average Customers		65,641
13 .			
14 .	Meter Equivalents By Meter Size	5/8 x 3/4	1
15 .		3/4	1.5
16 .		1	2.5
17 .		1 1/2	5
18 .		2	8
19 .		3	15
20 .		4	25
21 .		6	50
22 .		8	80
23 .		10	115
24 .		12	165
25 .			
26 .	Total Meter Equivalents	5/8 x 3/4	56,578
27 .		3/4	2,646
28 .		1	10,368
29 .		1 1/2	5,055
30 .		2	15,936
31 .		3	360
32 .		4	2,300
33 .		6	1,200
34 .		8	640
35 .		10	115
36 .		12	0
37 .	Total Meter Equivalents	TOTAL	<u>95,198</u>

**CALIFORNIA-AMERICAN WATER COMPANY
CENTRAL DIVISION
METER SERVICE COUNT
ADVICE LETTER 1357
WORKPAPER 1-6**

AL 1357

	Description		
1 .	Average Customers by Meter Size	5/8 x 3/4	31,585
2 .	(Monterey Main, Ambler, Hidden Hills,	3/4	264
3 .	Ryan Ranch, Bishop and Chualar)	1	5,776
4 .		1 1/2	1,004
5 .		2	648
6 .		3	64
7 .		4	28
8 .		6	15
9 .		8	15
10 .		10	0
11 .		12	0
12 .		TOTAL Average Customers	39,399
13 .			
14 .	Meter Equivalents by Meter Size	5/8 x 3/4	1
15 .		3/4	1.5
16 .		1	2.5
17 .		1 1/2	5
18 .		2	8
19 .		3	15
20 .		4	25
21 .		6	50
22 .		8	80
23 .		10	115
24 .		12	165
25 .			
26 .	Total Meter Equivalents	5/8 x 3/4	31,585
27 .		3/4	396
28 .		1	14,440
29 .		1 1/2	5,020
30 .		2	5,184
31 .		3	960
32 .		4	700
33 .		6	750
34 .		8	1,200
35 .		10	0
36 .		12	0
37 .		TOTAL	<u>60,235</u>

**CALIFORNIA-AMERICAN WATER COMPANY
SOUTHERN DIVISION
METER SERVICE COUNT
ADVICE LETTER 1358
WORKPAPER 1-7**

AL 1358

	Description		
1.	Average Customers by Meter Size	5/8 x 3/4	52,321
2.		3/4	593
3.		1	13,149
4.		1 1/2	2,085
5.		2	2,574
6.		3	148
7.		4	106
8.		6	41
9.		8	11
10.		10	3
11.		12	0
12.		TOTAL Average Customers	71,031
13.			
14.	Meter Equivalents by Meter Size	5/8 x 3/4	1
15.		3/4	1.5
16.		1	2.5
17.		1 1/2	5
18.		2	8
19.		3	15
20.		4	25
21.		6	50
22.		8	80
23.		10	115
24.		12	165
25.			
26.	Total Meter Equivalents	5/8 x 3/4	52,321
27.		3/4	890
28.		1	32,873
29.		1 1/2	10,425
30.		2	20,592
31.		3	2,220
32.		4	2,650
33.		6	2,050
34.		8	880
35.		10	345
36.		12	0
37.		TOTAL	<u>125,246</u>

COM/DH7/nd3

Date of Issuance 3/24/2022

Decision 22-03-022 March 17, 2022

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Evaluating the Commission’s 2010 Water Action Plan Objective of Achieving Consistency between Class A Water Utilities’ Low-Income Rate Assistance Programs, Providing Rate Assistance to All Low – Income Customers of Investor-Owned Water Utilities, and Affordability.

Rulemaking 17-06-024

**DECISION GRANTING COMPENSATION TO
PACIFIC INSTITUTE FOR STUDIES
IN DEVELOPMENT, ENVIRONMENT, AND SECURITY
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 20-08-047**

Intervenor: Pacific Institute for Studies in Development, Environment, and Security	For contribution to Decision (D.) 20-08-047
Claimed: \$19,420	Awarded: \$19,420.00
Assigned Commissioner: Darcie L. Houck ¹	Assigned ALJs: Camille Watts-Zagha and Robert W. Haga

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>This decision concludes that the Water Revenue Adjustment Mechanisms are ineffective in achieving conservation and that a Monterey-Style WRAM will better serve this purpose. In addition, the decision:</p> <ol style="list-style-type: none"> 1. directs utilities must provide analysis in their next general rate case to determine the appropriate Tier 1 rate breakpoint,
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¹ Proceeding was reassigned from Commissioner Guzman Aceves to Commissioner Houck on January 24, 2022.

	<p>2. adopts consistent terminology across low-income rate assistance programs,</p> <p>3. authorizes a pilot program to provide discounts to low-income tenants in multi-family dwellings that don't pay their water bill through the utility, and</p> <p>4. it requires standardized reporting requirements to be followed by water utilities and outlines information required to streamline consideration of consolidation requests.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812²:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	September 11, 2017	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	September 25, 2017 (original) March 9, 2018 (supplement) May 28, 2018 (supplement)	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.17-06-024	Verified
6. Date of ALJ ruling:	06/29/2017	Verified
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes

² All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
Showing of “significant financial hardship” (§ 1802(h) or § 1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	Rulemaking 17-06-024	Verified
10. Date of ALJ ruling:	January 30, 2018	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.20-08-047	Verified
14. Date of issuance of Final Order or Decision:	09/03/2020	Verified
15. File date of compensation request:	09/10/2020	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. Sales Forecasting Pacific Institute believes it would be helpful to distinguish between short- and long-term sales forecasting. Accurate long-term water demand forecasts are essential planning tools and can help avoid costly investments in unnecessary water infrastructure. Water utilities should avoid constructing unnecessary and costly infrastructure and supplies by accurately accounting for declines in per- capita water demand.</p>	<p>D20-05-047, pp. 50-51 Further, certain factors should be included in the sales forecasting model presented by a water utility in its GRC or equivalent. While water utilities may still choose their preferred water sales forecasting model, the following factors should be incorporated into the model they choose:</p> <ol style="list-style-type: none"> 1. Impact of revenue collection and rate design on sales and revenue collection. 2. <u>Impact of planned conservation programs.</u> 3. <u>Changes in customer counts.</u> 4. <u>Previous and upcoming changes to</u> 	Verified

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p><u>building codes requiring low flow fixtures and other water-saving measures, as well as any other relevant code changes.</u></p> <p>5. Local and statewide trends in consumption, demographics, climate population density and historic trends by ratemaking area.</p> <p>6. Past Sales Trends.</p> <p>February 23, 2018 comments, pp. 12 & 16. Pacific Institute's recent work on the issue has focused on recommendations to improve the accuracy of long- term forecasts, but these recommendations are also relevant to improving medium- term sales forecasts. Water utilities should avoid constructing unnecessary and costly infrastructure and supplies by <u>accurately accounting for declines in per-capita water demand. Water use tends to decline due to passive turnover to more efficient devices, and active conservation and efficiency programs led by the water utility.</u> Managing costs prevents unnecessary rate increases to the benefit of all customers, especially low income residents.</p> <p><u>Here, we focus on incorporating the impacts of efficiency standards and codes as well as uncertainty into long-term demand forecasts because (1) these are areas of expertise for the Pacific Institute, and (2) they are not often adequately incorporated into long-range demand forecasts</u></p> <p>July 10, 2019 comments, pp. 3 To account for efficiency</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p>improvements, <u>forecasters should consider the various end uses of water by examining the stock and efficiency of appliances</u> as well as behavioral aspects of water use, such as shower duration and frequency. This approach is described in detail in the Water Research Foundation's 2018 report, Integrating Water Efficiency into Long-Term Demand Forecasting.</p>	
<p>2. Low-income rate assistance programs</p> <p>Pacific Institute supports coordination between AB 401 and LIRA programs offered by CPUC. The Joint Advocates strongly support the intent of the proposal, which is to ensure that the cost of water for Essential Indoor Uses (EIU) is affordable for low-income Californians.</p>	<p>D.20-08-047, pp. 82 Lastly, we agree with the Public Advocates that <u>multi-family housing units should qualify for LIRA programs if the housing is owned by a non-profit and are for the explicit purpose of providing affordable housing to low-income residents.</u> We direct Class A water utilities with existing LIRA programs to update their eligibility to reflect this change.</p> <p>July 27, 2020 comment, pp. 8-9 In a public comment letter to the Water Board's AB 401 public process, California Housing Partnership Corporation and Pacific Institute discussed the topic of multi-family housing affordability. <u>In that letter, we identified the multifamily affordable housing sector as the most tractable for affordability programs - The nonprofit affordable housing sector would benefit greatly from discounted conservation and efficiency programs as well as bill discounts.</u></p> <p>D.20-08-047, pp. 15 <i>Coordination of Issues Between Statewide Water Legislation and Commission-Regulated</i></p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p><i>Water Utilities</i> The resolution of three of the scoped issues in particular will be guided by adopted or pending legislation, or regulatory processes of other California regulatory agencies.</p> <p>July 10, 2019 comment, pp.8 CforAT and Pacific Institute <u>strongly support adoption of a low-income support program for water across all water districts in California, which would require legislative action and/or coordination with other agencies such as the Water Board.</u> CforAT and Pacific Institute encourage the Commission to take all reasonable action to encourage creation of such a program. To the extent that there is no viable path to create a state-wide program, CforAT and Pacific Institute recommend that the Commission act to create a consolidated program for all water utilities subject to its jurisdiction.</p> <p>D.20-08-047, pp. 81 Accordingly, we direct California-American Water Company to file a Tier 3 advice letter, <u>within 120-days of the issuance of this decision,</u> outlining a pilot program based on AL 1221 that provides a discount to water users in lowincome multi-family through their housing providers.</p> <p>July 27, 2020 comment, pp. 10 On the process for California- American Water to develop their pilot program, we have two comments. <u>First, the Joint Advocates would support extending the timeline for California-American Water to develop their pilot program from 60</u></p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	to 120 days.	
<p>3. Water revenue adjustment mechanism</p> <p>Pacific Institute believes that better demand forecasting can assist in the stabilization of revenue to minimize impact to ratepayers and improve water affordability. Pacific Institute recommends pre-approved drought surcharges on Tier 2 and higher usage to keep revenue closely aligned with expenses.</p>	<p>D. 20-08-047, pp. 18 In addition, parties highlighted the reality that <u>drought is the new normal in California and that forecasts need to be more accurate</u> so that WRAMs can be smaller, and that the Monterey-style WRAM would provide better incentives for parties to more accurately forecast sales while still providing the utility the ability to earn a reasonable rate of return</p> <p>February 23, 2018 comment, pp. 14-15 <u>Municipal water demand varies over time in response to a variety of factors, including population, economic activity, demographics, and the implementation of conservation and efficiency measures. Water demand can change dramatically during drought and water restriction, as many utilities experienced during California's most recent drought and restrictions in 2014. Forecasts should account for the impacts of: 1. conservation and efficiency standards and codes, 2. changing economic activity, 3. expected land use changes, 4. changing water price, 5. Climate change and drought, and 6. uncertainty.</u></p>	Verified
<p>4. Consolidation</p> <p>The commission should require utilities that are consolidating involve residents meaningfully in every step of the process. In addition, potential for consolidation should be examined</p>	<p>D.20-08-047, pp. 92 These nonduplicative items proposed by both California Water Association and the Public Advocates Office of the Public Utilities Commission are approved and listed below:</p> <p><u>19. Provide copies of all notices of a</u></p>	Verified

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>in systems violating water quality standards and those that are at risk.</p>	<p><u>proposed acquisition given to affected customers.</u></p> <p>20. <u>Provide copies of all disclosures and customer notices required by Pub. Util. Code § 10061 related to the sale and disposal of utilities owned by municipal corporations.</u></p> <p>February 23, 2018 comments, pp. 6 Rather, the Commission must ensure that consolidations that involve a private company subsuming a public water district <u>meaningfully involve community residents at every stage of the process.</u> This means, at a minimum, <u>outreach to the impacted community in the language(s) spoken by residents with translated materials,</u> community meetings and workshops as necessary, exploration of feasible alternatives, presentation of effects on rates and administrative sustainability to the community, and finally a voice in determining the solution.</p> <p>D.20-08-047, pp. 97 The Public Advocates Office of the Public Utilities Commission recommended utilities be required to perform a "cross check" with the Board's most current list of drinking water systems statewide that are out of compliance with drinking water standards. However, we will remove the word adjacent from the requirement, and <u>include all types of out-of-compliance systems regardless of geographic proximity.</u></p> <p>February 23, 2018 comment, pp. 9 The CPUC should adopt a</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p>requirement that <u>all regulated water utilities identify communities near their service areas that struggle with water or wastewater deficiencies</u> or unaffordability, identify feasible alternatives for solutions, and provide a publicly accessible report of those findings to the Commission.</p> <p>July 27, 2020 comment, pp. 10 The Proposed Decision is correct in stating that consolidation is a tool to remedy systems failing water quality and may also be a means of improving affordability by improving economies of scale and eliminating redundant administrative and operating costs. <u>We strongly support the consideration of consolidations outside of GRCs.</u></p>	
<p>5. Tier 1 Water Usage and Water Baselines Comments</p> <p>Pacific Institute, along with Center for Accessible Technology, supports a calculation of Essential Indoor Usage (EIU) based on household size and average usage in a water utility service area. However, average essential indoor water use in California has been declining and is currently below 55 GPCD, especially for low-income households. The Joint Advocates are not opposed to lowering the average residential bill for 55 GPCD. However, we are uncomfortable with a) mischaracterizing 55 GPCD as a reasonable approximation of</p>	<p>D.20-08-047, pp. 105 <u>Water utilities should consider and provide analysis for establishing a baseline not set below both the Essential Indoor Usage of 600 cubic feet per household per month, as stated in the Affordability Rulemaking (R.18-07-006) and the average winter use in each ratemaking district.</u></p> <p>July 10, 2019 comment, pp. 5 PI and CforAt strongly recommend that any formula assigning levels of EIU for a water district include a <u>process that allows a customer to request a variance for a larger allocation</u> based on a simple showing of why that household's essential usage is higher than average</p> <p>August 15, 2018 comment, pp. 1 <u>Exercise caution before enshrining 55 GPCD as a standard for essential</u></p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
average EIU, and b) decreasing the cost of 55 GPCD by lowering the volumetric charge.	indoor <u>water use</u> . Average essential indoor water use in California has been declining and is currently below 55 GPCD. In addition, low-income households tend to be low-volume users.	

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?³	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: PI participated in joint position development and lead discussion and comment development on short-term water demand forecasting, pilot programs for low-income multi-family units, and coordination with AB 401 with Leadership Counsel for Justice and Accountability, Community Water Center, Natural Resources Defense Council, and Center for Accessible Technology.		Verified
d. Intervenor’s claim of non-duplication: Pacific Institute represents customers with a concern for the environment and employs staff with technical expertise in quantitative data analysis and water management that distinguishes us from other customer advocates that are intervening in the proceeding. Pacific Institute has worked closely with Community Water Center, The Natural Resources Defense Council, and the Leadership Counsel for Justice and Accountability in the past, and closely coordinated with those organizations and Center for Accessible Technology in this proceeding in order to avoid duplication of effort. Though our interests in securing affordable drinking water for disadvantaged communities are aligned, these organizations have differing areas of expertise and represent diverse interests of different communities with distinct barriers to safe and		Noted

³ The Office of Ratepayer Advocates was renamed the Public Advocate’s Office of the Public Utilities Commission pursuant to Senate Bill 854, which the Governor approved on June 27, 2018.

	Intervenor’s Assertion	CPUC Discussion
	affordable water. Pacific Institute coordinated with other parties to avoid duplication and, where appropriate, submitted joint comments and resolved issues ahead of formal hearings. Pacific Institute's Laura Feinstein also spoke on a panel on August 2 nd , 2019 as a part of the proceeding that discussed low income rate assistance programs.	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness: Pacific Institute creates and advances solutions to the world's most pressing water challenges, such as unsustainable water management and use; climate change; environmental degradation; food, fiber, and energy production; and basic lack of access to fresh water and sanitation. Pacific Institute has significant technical, financial, and policy experience with water affordability and efficiency programs. Pacific Institute provided technical analysis on critical issues relevant to the proceeding and provided specific recommendations to maximizes benefit to residents who are struggling with unaffordable water rates while also encouraging water efficiency.</p>	Noted
<p>b. Reasonableness of hours claimed: Pacific Institute led problem-solving and comment drafting on short term water demand forecasting and ((Part II (B)(c)), participated in all workshops relating Phase 1 of this proceeding, and coordinated with other parties to avoid duplication of efforts ((Part II (B)(d)). Pacific Institute's claim is conservative for several reasons:</p> <ol style="list-style-type: none"> 1. All Pacific Institute comments were informed by the expert knowledge of our staff, curated over the organization's long history of research and engagement on issues covered in this proceeding. This request does not include hours for coordination logistics with partner organizations. It also excludes hours necessary for PI staff to become experts on low-income rate assistance programs or AB 401 (ie. Time of Use Rates). PI staff's prior knowledge of the topics in the proceeding allowed for comments to be written efficiently, without the extra cost of 	Noted

	CPUC Discussion																												
background research. 2. Pacific Institute worked diligently to catalyze coordination, comment letter scoping, and discussion with our partners.																													
c. Allocation of hours by issue: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="4" style="text-align: left; font-weight: normal;">Allocation of Hours by Issue</th> </tr> <tr> <th colspan="2" style="text-align: left; font-weight: normal;">PI's time is allocated by issue category as follows:</th> <th style="text-align: center; font-weight: normal;">Number of Hours</th> <th style="text-align: center; font-weight: normal;">Percent of Time</th> </tr> </thead> <tbody> <tr> <td style="font-weight: normal;">A</td> <td style="font-weight: normal;">Affordable Rate Structures</td> <td style="text-align: center;">29</td> <td style="text-align: center;">30%</td> </tr> <tr> <td style="font-weight: normal;">O</td> <td style="font-weight: normal;">Organizing, Position Development, and Problem Solving with Joint Parties</td> <td style="text-align: center;">13.5</td> <td style="text-align: center;">14%</td> </tr> <tr> <td style="font-weight: normal;">S</td> <td style="font-weight: normal;">Sales Forecasting</td> <td style="text-align: center;">16</td> <td style="text-align: center;">16%</td> </tr> <tr> <td style="font-weight: normal;">L</td> <td style="font-weight: normal;">Low-Income Rate Assistance Programs</td> <td style="text-align: center;">33.5</td> <td style="text-align: center;">34%</td> </tr> <tr> <td style="font-weight: normal;">W</td> <td style="font-weight: normal;">Water Rate Adjustment Mechanism</td> <td style="text-align: center;">6</td> <td style="text-align: center;">6%</td> </tr> </tbody> </table>	Allocation of Hours by Issue				PI's time is allocated by issue category as follows:		Number of Hours	Percent of Time	A	Affordable Rate Structures	29	30%	O	Organizing, Position Development, and Problem Solving with Joint Parties	13.5	14%	S	Sales Forecasting	16	16%	L	Low-Income Rate Assistance Programs	33.5	34%	W	Water Rate Adjustment Mechanism	6	6%	Noted
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Laura Feinstein	2018	41	\$170.00	Attachment 2 (Basis for Rates)	\$6,970	41.00	\$170.00 [1]	\$6,970.00
Laura Feinstein	2019	15	\$170.00	Attachment 2 (Basis for Rates)	\$2,550	15.00	\$170.00 [1]	\$2,550.00
Laura Feinstein	2020	18	\$170.00	Attachment 2 (Basis for Rates)	\$3,060	18.00	\$170.00 [1]	\$3,060.00
Sarah Diringer	2018	4.5	\$170.00	Attachment 2 (Basis for Rates)	\$765	4.50	\$170.00 [2]	\$765.00
Darcy Bostic	2020	19.5	\$150.00	Attachment 2 (Basis for Rates)	\$2,925	19.50	\$150.00 [3]	\$2,925.00
Subtotal: \$16,270.00						Subtotal: \$16,270.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Darcy Bostic	2020	31	\$75.00	Attachment 2 (Basis for Rates)	\$2,325	31.00 [5]	\$75.00	\$2,325.00

CLAIMED						CPUC AWARD		
Heather Cooley	2020	7.5	\$110.00	Attachment 2 (Basis for Rates)	\$825	7.50	\$110.00 [4]	\$825.00
Subtotal: \$3,150.00						Subtotal: \$3,150.00		
TOTAL REQUEST: \$19,420.00						TOTAL AWARD: \$19,420.00		

*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time are typically compensated at 1/2 of preparer's normal hourly rate

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Basis for Rates

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	Adopting \$170 rate for 2018, 2019, and 2020. Although Resolution ALJ-352,357, and 387 set the rate for an expert with 11 years of experience between \$180-\$315, \$170 is the rate billed by Feinstein to Pacific Institute. Feinstein has 11 years of experience in water affordability and sustainable water policy. She was a California Sea Grant Science Fellow and has been recognized by the California Senate for her service to the state. She holds a BA from UC Berkeley in anthropology and a PhD from UC Davis in ecology.
[2]	Adopting \$170 rate for 2018. Although Resolution ALJ-352 sets the rate for an expert with 8 years of experience between \$180-\$300, \$170 is the rate charged by Diringier to Pacific Institute. Diringier has 8 years of experience in water policy and management, specializing in water demand forecasting. Diringier has also worked as a research associate for a water focused NGO in Los Angeles and conducted assessments for California's Central Coast Regional Water Quality Control Board. She has a BS in Environmental Science from UCLA and a PhD in Civil and Environmental Engineering from Duke University.

Item	Reason
[3]	Adopting \$150 rate for 2018. Although Resolution ALJ-352, 357, and 387 set the rate for an expert with 0-6 years of experience between \$150-\$255, \$150 is the rate charged by Bostic to Pacific Institute.
[4]	Adopting \$220 rate for 2018, 2019, and 2020. Although Resolution ALJ-352, 357, and 387 set the rate for an expert with 13+ years of experience between \$180-\$465, \$220 is the rate billed by Cooley to Pacific Institute. Cooley has 13+ years of experience in water policy and management specializing in the relationship between water efficiency, effective water planning, and water costs. She has worked at Lawrence Berkeley Laboratory studying climate and land use change and carbon cycling. Cooley received a B.S. in Molecular Environmental Biology and a master’s degree in Energy and Resources from the University of California, Berkeley.
[5]	We find 28% of Pacific Institute’s request of Intervenor Compensation Claim Preparation (IComp Prep) hours to be excessive. However, since Pacific Institute is a first-time intervenor, we will not make reductions for IComp Prep at this time but note that the volume of hours for IComp Prep requested cannot be justified in the future for a claim of this amount.

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (see § 1804(c))

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. Pacific Institute for Studies in Development, Environment, and Security has made a substantial contribution to D.20-08-047.
2. The requested hourly rates for Pacific Institute for Studies in Development, Environment, and Security’s representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$19,420.00.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Pacific Institute for Studies in Development, Environment, and Security shall be awarded \$19,420.00.
2. Within 30 days of the effective date of this decision, the California Water Service Company shall pay Pacific Institute for Studies in Development, Environment, and Security the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 6, 2021, the 75th day after the filing of Pacific Institute for Studies in Development, Environment, and Security's request, and continuing until full payment is made.
3. California Water Service Company shall invoice the other Class A water companies for their respective shares of the award, based on their California-jurisdictional 2018 jurisdictional water revenues for the 2018 calendar year within 30 days of the effective date of this decision. Within 15 days of invoice, California-American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos), Liberty Utilities (Park Water), San Gabriel Valley Water Company, San Jose Water Company, and Suburban Water Systems shall pay California Water Service Company their respective shares of the award, based on their California-jurisdictional 2018 jurisdictional water revenues for the 2018 calendar year, to reflect the year in which the proceeding was primarily litigated.
4. The comment period for today's decision is waived.

This decision is effective today.

Dated March 17, 2022, at San Francisco, California.

ALICE REYNOLDS

President

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

DARCIE L. HOUCK

JOHN R.D. REYNOLDS

Commissioners

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D2203022	Modifies Decision?	No
Contribution Decision(s):	D2008047		
Proceeding(s):	R1706024		
Author:	ALJ Watts-Zagha and ALJ Haga		
Payer(s):	California Water Service Company on behalf of Class A water companies		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
Pacific Institute for Studies in Development, Environment, and Security	10/10/2020	\$19,420	\$19,420.00	N/A	<i>See Part III.D, CPUC Comments, Disallowances, and Adjustments above.</i>

Hourly Fee Information

First Name	Last Name	Labor Role	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Laura	Feinstein	Expert	\$170	2018	\$170.00
Laura	Feinstein	Expert	\$170	2019	\$170.00
Laura	Feinstein	Expert	\$170	2020	\$170.00
Sarah	Diringer	Expert	\$170	2018	\$170.00
Darcy	Bostic	Expert	\$150	2020	\$150.00
Heather	Cooley	Expert	\$220	2020	\$220.00

(END OF APPENDIX)

CHECK CONTAINS A VOID PANTOGRAPH, MICROPRINT BORDER, CHEMICAL REACTANTS AND A WATERMARK ON BACK — HOLD AT AN ANGLE TO VIEW

American Water

1 Water Street
Camden, NJ 08102

PNC BANK, NA 95-277
NEW JERSEY 312

NO. 1500061198
DATE 10/18/2022

EIGHT THOUSAND FIVE HUNDRED NINETY and 10/100 *****

\$*****8,590.10*
VOID AFTER 90 DAYS

PAY TO THE
ORDER OF:

CALIFORNIA WATER ASSOCIATION
808 R St, Ste 209
Sacramento CA 95811-6402



⑈ 150006 1198 ⑈ ⑆ 03 1202770 ⑆ 8013584806 ⑈