



**Suburban
Water Systems**

A SouthWest Water Company

1325 N. Grand Ave. Ste. 100, Covina, CA 91724-4044
Phone: 626.543.2500, Fax: 626.331.4848
www.swwc.com

U-339-W

VIA EMAIL

ADVICE LETTER NO. 365-W

March 31, 2022

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Suburban Water Systems (“Suburban”) hereby transmits the following changes in tariff schedules applicable to its service area and which are attached hereto:

CPUC Sheet No.	Title of Sheet	Canceling CPUC Sheet No.
1838-W	Schedule SJ-1 (Continued) San Jose Hills Service Area – Residential Metered Service	1827-W
1839-W	Schedule SJ-2 (Continued) San Jose Hills Service Area – Non Residential Metered Service	1829-W
1840-W	Schedule SJ-3 (Continued) San Jose Hills Service Area – Recycled Water Metered Service	1785-W
1841-W	Schedule WLM-1 (Continued) Whittier/La Mirada Service Area – Residential Metered Service	1833-W
1842-W	Schedule WLM-2 (Continued) Whittier/La Mirada Service Area – Non Residential Metered Service	1835-W
1843-W	Table of Contents	1837-W

This advice letter seeks Commission authorization for Suburban’s allocation of 2019 and 2020 Parent Company (SWWC) Information Technology (IT) rate base memorandum account amortization via a temporary surcharge for the remaining of the General Rate Case (GRC) cycle, June 1, 2022 through December 31, 2023. The requested annual amortization of revenue requirement in this filing is \$577,419 or 0.59% of adopted 2022 operating revenue. The total requested amount in this filing is \$914,247.

Background

This request is made pursuant to Ordering Paragraph No. 2 of Decision (D.) No. 21-10-024 which states:

“The joint motion (filed on April 14, 2021) for adoption of the Settlement Agreement is granted, and the Settlement Agreement attached to this decision as Appendix A is approved and adopted.”

Furthermore, the approved Settlement Agreement Between Suburban Water Systems and the Public Advocates Office related to Suburban’s Special Request No. 3: January 2018 – June 2019 SWWC IT Rate Base Offset states:

“...The parties agree that Suburban will file the 2019 and 2020 SWWC IT Rate Base Offset via Tier 3 Advice Letter filing after the projects from years 2019 – 2020 are completed. Suburban will file a Tier 1 Advice Letter to incorporate language into its preliminary statement as shown in Appendix F.”

Also, in accordance with the settlement agreement, Suburban understands that Public Advocates would allow a total amount not to exceed \$2,745,000 in 2019, which is equal to the amount authorized, and by extension a similar amount in 2020. The 2019 and 2020 actual project costs’ were \$2,921,751 and \$2,153,211, respectively. However, based on the settlement agreement, Suburban requests recovery of projects’ cost of \$2,745,000 and \$2,153,211 for 2019 and 2020, respectively.

In addition, the preliminary statement adopted in D.21-10-024 on the Allocated Parent Company Information Technology (IT) Rate Base Memorandum Account requires that requests shall be reduced by Suburban’s share of the IT Projects’ recorded capitalized labor costs, but not to exceed the amount adopted in rates. Consequently Suburban has reduced its request by \$1,085,000, the capitalized labor related to 2019 cost, and the same amount also applies for year 2020 cost, both before the three factor allocation calculation. The calculated amount also includes refund to customers related to the uncollectible and franchise fees on the 2019 and 2020 Suburban’s portion of the allocated capitalized labor costs. In addition, while preparing this calculation we discovered an error in the earlier calculation for 2018 IT ratebase recovery that incorrectly understated the surcharge by \$175,588. We have not corrected for that error. However, we have avoided making a similar error in this calculation that would otherwise have incorrectly understated the surcharge by \$219,400 for each year, totalling \$438,800 for years 2019 and 2020.

In this advice letter, Suburban requests that Suburban’s allocated amounts for the 2019 and 2020 Parent Company IT rate base memorandum account be amortized as a volumetric surcharge of \$0.031 per hundred cubic feet of water consumed, and to be recovered over the nineteen months remaining in the GRC cycle. Included in the surcharge is the remaining undercollection of \$43,957 related to the previously authorized one-time surcharge on Suburban’s allocated portion of 2018 IT rate base per D.21-10-024, implemented via advice letter 359-W, commencing on January 1, 2022. The company will include the next Suburban allocated rate base in the upcoming GRC filing as part of the cost of service calculation, which is currently scheduled to be filed on January 2, 2023.

The soft copies of the work papers supporting the requested amortization are supplied separately to the Water Division.

Tier Designation and Effective Date

In compliance with D.21-10-024, this advice letter is submitted with a Tier 3 designation, and Suburban requests this advice filing become effective for periods of approximately 19 months or until the under-collection in the Allocated Parent Company IT Rate Base Memorandum Account has been fully amortized, beginning June 1, 2022.

Notice

Customer Notice – in compliance with Water Industry Rule 3.1 of General Order 96-B, a legal

notice of this advice letter is being published in the newspaper of local circulation. A copy of proof of the newspaper publication will be provided to the Water Division after receipt from the newspaper. Also, according to this rule an individual customer notice is not required when the offset is less than 10% of the revenue requirement. Nevertheless, Suburban will provide a bill message identifying the surcharge in the first bill that includes the rate change.

In compliance with General Rule 4.3 and 7.2 and Water Industry Rule 4.1 of General Order 96-B, a copy of this advice letter has been mailed or electronically transmitted to all interested and affected parties as detailed in Attachment A.

Protest 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 error 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, 3rd floor
California Public Utilities Commission,
505 Van Ness Avenue, San Francisco, CA 94102
Water.Division@cpuc.ca.gov

On the same date any protest or response is submitted to the Water Division, the respondent or protestant must serve a copy of the protest or response to:

Suburban Water Systems, Kiki Carlson, Regulatory Affairs Manager, 1325 N. Grand Ave., Suite 100, Covina, CA 91724-4044, and email to kcarlson@swwc.com

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.

Replies: The utility shall reply to each protest and may reply to any response. Each reply must be received by the Division of Water and Audits within 5 business days after the end of the protest period, and shall be served on the same day to the person who filed the protest or response.

If you have not received a reply to your protest within 10 business days, contact Suburban Water Systems at (626) 543-2500.

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

Sincerely,

/s/Kiki Carlson_____

Kiki Carlson
Regulatory Affairs Manager

Enclosure

SUBURBAN WATER SYSTEMS
Distribution List

Attachment A

Page 1 of 3

Director Of Public Works
City of Whittier
13230 E. Penn Street
Whittier, CA 90602

City Clerk
City of West Covina
1444 W. Garvey Ave. South
West Covina, CA 91790

City Attorney
City of Whittier
13230 E. Penn Street
Whittier, CA 90602

City Clerk
City of La Mirada
P.O. Box 828
La Mirada, CA 90638

Michael Gualtieri
La Habra Heights County Water District
P.O. Box 628
La Habra, CA 90633-0628

City Attorney
City of Baldwin Park
14406 E. Pacific Ave.
Baldwin Park, CA 91706

City Clerk
City of Industry
P.O. Box 3366
Industry, CA 91744

County Clerk
Orange County
10 Civic Center Plaza, 3rd. Floor
Santa Ana, CA 92701

City Clerk
City of Covina
125 East College Blvd.
Covina, CA 91723

City Attorney
City of Covina
125 East College Blvd.
Covina, CA 91723

Director of Public Works
City of Buena Park
6650 Beach Blvd.
Buena Park, CA 90621

City of Santa Fe Springs
Department of Public Works
11710 E. Telegraph Road
Santa Fe Springs, CA 90670

Bill Robinson
Upper San Gabriel Valley M.W.D.
1146 East Louisa Avenue
West Covina, CA 91790-1346

City Attorney
City of La Habra
P.O. Box 337
La Habra, CA 90633

City Attorney
City of West Covina
1444 West Garvey Ave. South
West Covina, CA 91790

City Clerk
City of Baldwin Park
14406 E. Pacific Ave.
Baldwin Park, CA 91706

The Prinden Corporation
P.O. Box 712
Park Ridge, NJ 07656-0712

Orchard Dale County Water District
13819 East Telegraph Road
Whittier, CA 90604

SUBURBAN WATER SYSTEMS
Distribution List

City Attorney
City of La Mirada
P.O. Box 828
La Mirada, CA 90638

County Clerk
Los Angeles County
12400 Imperial Hwy, Room 2001
Norwalk, CA 90650

County Counsel
Orange County
10 Civic Center Plaza, 3rd. Floor
Santa Ana, CA 92701

City Clerk
City of La Puente
15900 East Main St.
La Puente, CA 91744

City Clerk
City of Glendora
116 East Foothill Blvd.
Glendora, CA 91741

City Attorney
City of Glendora
116 East Foothill Blvd.
Glendora, CA 91741

City Clerk
City of Walnut
P.O. Box 682
Walnut, CA 91788-0682

City Attorney
City of Walnut
P.O. Box 682
Walnut, CA 91788-0682

Jandy Macias, General Manager
Valley County Water District
JMacias@vcwd.org

Ed Jackson
Liberty Utilities
AdviceLetterService@LibertyUtilities.com

City Attorney
City of Buena Park
pbobko@rwglaw.com

City Attorney
City of Industry
mvadon@bwslaw.com

Rowland Water District
gsanchez@rwd.org

Valencia Heights Water Co.
dmichalko@vhwc.org

California Domestic Water Company
lnoriega@caldomestic.com

Walnut Valley Water District
cfleming@wvwd.com

City Clerk
City of La Habra
tmason@lahabracity.com

California Advocates Office Water Branch
California Public Utilities Commission
PublicAdvocatesWater@cpuc.ca.gov

City of Buena Park
Attn: Water Department
mgrisso@buenapark.com

City Clerk
City of La Puente
sgarcia@lapuente.org

SUBURBAN WATER SYSTEMS
Distribution List

Page 3 of 3

Chris Banner
South Hills Country Club
2655 S. Citrus Street
West Covina, CA 91791
cbanner@southhillscountryclub.org

Jeff Boand
O'Donnell Chevrolet – Buick
1312 Golden Vista Drive
West Covina, CA 91791
jboand007@aol.com

Ronald Moore
Golden State Water Company
Regulatory Affairs Department
630 E. Foothill Blvd.
San Dimas, CA 91709
RKMoore@gswater.com

The Public Advocates Office
California Public Utilities Commission
Richard.Raushmeier@cpuc.ca.gov
Hani.Moussa@cpuc.ca.gov

Audrey F. Jackson
Golden State Water Company
AFJackson@gswater.com

City of Azusa
Assistant Director – Water Operations
Imacias@AzusaCa.Gov

Schedule SJ-1
 (Continued)

SAN JOSE HILLS SERVICE AREA
RESIDENTIAL METERED SERVICE

SPECIAL CONDITIONS

6. As authorized by the California Public Utilities Commission (C.P.U.C.), pursuant to D.19-05-029, all non Low Income Ratepayer Assistance (LIRA) bills are subject to a surcharge of \$0.025 per 100 cubic feet, for a 12-month period, beginning with the effective date of Advice Letter 335-W. This surcharge will recover the under-collected balance in the LIRA Program as of September 30, 2016.
7. As authorized by the California Public Utilities Commission (C.P.U.C.) pursuant to D.19-05-029, all bills are subject to a surcredit of \$0.080 per 100 cubic feet for a 12-month period, beginning with the effective date of Advice Letter 335-W. This surcredit will refund the overcollected balance in the Water Revenue Adjustment Mechanism (WRAM) Balancing Account.
8. As authorized by the California Public Utilities Commission (C.P.U.C.), all bills are subject to surcharge of \$0.204 per 100 cubic feet. This surcharge will amortize the shortfall in revenue between the interim rates implemented on January 1, 2018 and pursuant to Decision 19-05-029 the rates approved in Advice Letter 335-W which became effective on July 6, 2019. This surcharge shall commence on August 7, 2019 and remain in effect for an estimated 24-month period or until the shortfall in revenue is fully amortized.
9. As authorized by the California Public Utilities Commission (C.P.U.C.) pursuant to D.21-10-024, all bills are subject to a one-time surcharge of \$0.12 per 100 cubic feet of water used, beginning with the effective date of Advice Letter 359-W. This surcharge will amortize the under-collection balance in various Memorandum and Balancing Accounts. (D)
(T)
10. As authorized by the California Public Utilities Commission (C.P.U.C.), all bills are subject to surcharge of \$0.031 per 100 cubic feet of water consumed. This surcharge will amortize the under-collection balance in the Allocated Parent Company IT Rate Base Memorandum Account related to the 2019 and 2020 Information Technology capital expenditures. The surcharge will commence on the effective date of Advice Letter 365-W, and will remain in effect for an estimated 19-month period or until the under-collection balance is fully amortized. (N)
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(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advise Letter No. <u>365-W</u>	<u>Craig D. Gott</u> <small>Name</small>	Date Filed _____
Decision No. <u>D.21-10-024</u>	<u>President</u> <small>Title</small>	Effective _____
		Resolution No. _____

Schedule SJ-2
(Continued)

SAN JOSE HILLS SERVICE AREA
NON RESIDENTIAL METERED SERVICE

SPECIAL CONDITIONS

- 6. As authorized by the California Public Utilities Commission (C.P.U.C.), pursuant to D.19-05-029, all bills are subject to a surcharge of \$0.025 per 100 cubic feet, for a 12-month period, beginning with the effective date of Advice Letter 335-W. This surcharge will recover the under-collection balance in the LIRA Program as of September 30, 2016.
- 7. As authorized by the California Public Utilities Commission (C.P.U.C.), all bills are subject to surcharge of \$0.204 per 100 cubic feet. This surcharge will amortize the shortfall in revenue between the interim rates implemented on January 1, 2018 and pursuant to Decision 19-05-029 the rates approved in Advice Letter 335-W which became effective on July 6, 2019. This surcharge shall commence on August 7, 2019 and remain in effect for an estimated 24-month period or until the shortfall in revenue is fully amortized.
- 8. As authorized by the California Public Utilities Commission (C.P.U.C.) pursuant to D.21-10-024, all bills are subject to a one-time surcharge of \$0.12 per 100 cubic feet of water used, beginning with the effective date of Advice Letter 359-W. This surcharge will amortize the under-collection balance in various Memorandum and Balancing Accounts.
- 9. As authorized by the California Public Utilities Commission (C.P.U.C.), all bills are subject to surcharge of \$0.031 per 100 cubic feet of water consumed. This surcharge will amortize the under-collection balance in the Allocated Parent Company IT Rate Base Memorandum Account related to the 2019 and 2020 Information Technology capital expenditures. The surcharge will commence on the effective date of Advice Letter 365-W, and will remain in effect for an estimated 19-month period or until the under-collection balance is fully amortized.

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(To be inserted by Cal. P.U.C.)

Issued by

Advise Letter No.	<u>365-W</u>	<u>Craig D. Gott</u>	Date Filed	_____
		Name		
Decision No.	<u>D.21-10-024</u>	<u>President</u>	Effective	_____
		Title		
			Resolution No.	_____

Schedule SJ-3
(Continued)

SAN JOSE HILLS SERVICE AREA
RECYCLED WATER METERED SERVICE

SPECIAL CONDITIONS

9. Low Income Ratepayer Assistance (LIRA) Memorandum Account
- a. The Company shall maintain a Low Income Ratepayer Assistance (LIRA) Memorandum Account to record the differences between LIRA discounts, program costs, and the revenues generated by the LIRA surcharge.
 - b. The Company will record the LIRA discounts (credits) for service as provided under Schedule No. LIC-1.
 - c. The Company will record the LIRA surcharge for service as provided under Special Conditions in Schedules SJ-3.
 - d. The Company will record the incremental costs for the LIRA program administration, which have not been reflected in authorized rates.
 - e. The Company shall maintain the LIRA memorandum account by making entries at the end of each month as follows:
 - i. A debit entry shall be made to the LIRA memorandum account at the end of each month to record the LIRA discounts and program costs.
 - ii. A credit entry shall be made to the LIRA memorandum account at the end of each month to record the revenues from the LIRA surcharges.
 - iii. Interest shall accrue to the LIRA memorandum account on a monthly basis by applying a rate equal to one-twelfth of the 3-month Commercial Paper Rate, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of month and the end-of-month balances.

The LIRA memorandum account shall go into effect on the effective date of Advice Letter 254-W.

10. As authorized by the California Public Utilities Commission (C.P.U.C.), pursuant to D. 19-05-029, all bills are subject to a surcharge of \$0.025 per 100 cubic feet, for a 12-month period, beginning with the effective date of Advice Letter 335-W. This surcharge will recover the under-collection balance in the LIRA Program as of September 30, 2016.
11. As authorized by the California Public Utilities Commission (C.P.U.C.) pursuant to D.21-10-024, all bills are subject to a one-time surcharge of \$0.12 per 100 cubic feet of water used, beginning with the effective date of Advice Letter 359-W. This surcharge will amortize the under-collection balance in various Memorandum and Balancing Accounts. (D)
(T)
12. As authorized by the California Public Utilities Commission (C.P.U.C.), all bills are subject to surcharge of \$0.031 per 100 cubic feet of water consumed. This surcharge will amortize the under-collection balance in the Allocated Parent Company IT Rate Base Memorandum Account related to the 2019 and 2020 Information Technology capital expenditures. The surcharge will commence on the effective date of Advice Letter 365-W, and will remain in effect for an estimated 19-month period or until the under-collection balance is fully amortized. (N)
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(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advise Letter No. 365-W Craig D. Gott Date Filed _____
Name
Decision No. 21-10-024 President Effective _____
Title
Resolution No. _____

Schedule WLM-1
 (Continued)

WHITTIER/LA MIRADA SERVICE AREA
RESIDENTIAL METERED SERVICE

SPECIAL CONDITIONS

6. As authorized by the California Public Utilities Commission (C.P.U.C.), pursuant to D.19-05-029, all non Low Income Ratepayer Assistance (LIRA) bills are subject to a surcharge of \$0.025 per 100 cubic feet, for a 12-month period, beginning with the effective date of Advice Letter 335-W. This surcharge will recover the under-collected balance in the LIRA Program as of September 30, 2016.
7. As authorized by the California Public Utilities Commission (C.P.U.C.) pursuant to D.19-05-029, all bills are subject to a surcredit of \$0.141 per 100 cubic feet for a 12-month period, beginning with the effective date of Advice Letter 335-W. This surcredit will refund the overcollected balance in the Water Revenue Adjustment Mechanism (WRAM) Balancing Account.
8. As authorized by the California Public Utilities Commission (C.P.U.C.), all bills are subject to surcharge of \$0.157 per 100 cubic feet. This surcharge will amortize the shortfall in revenue between the interim rates implemented on January 1, 2018 and pursuant to Decision 19-05-029 the rates approved in Advice Letter 335-W which became effective on July 6, 2019. This surcharge shall commence on August 7, 2019 and remain in effect for an estimated 36-month period or until the shortfall in revenue is fully amortized.
9. A surcredit of \$0.006 per 100 cubic feet of water used is to be applied to the monthly bills of all metered customers, excluding those customers receiving a Low Income Ratepayer Assistance (LIRA) credit, commencing on the effective date of Advice Letter 359-W, for approximately 12 months period.
10. As authorized by the California Public Utilities Commission (C.P.U.C.) pursuant to D.21-10-024, all bills are subject to a one-time surcharge of \$0.12 per 100 cubic feet of water used, beginning with the effective date of Advice Letter 359-W. This surcharge will amortize the under-collection balance in various Memorandum and Balancing Accounts. (D)
(T)
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(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advise Letter No. 365-W Craig D. Gott Date Filed _____
 Name
 Decision No. D.21-10-024 President Effective _____
 Title
 Resolution No. _____

Schedule WLM-2
(Continued)

WHITTIER/LA MIRADA SERVICE AREA
NON RESIDENTIAL METERED SERVICE

SPECIAL CONDITIONS

- 6. As authorized by the California Public Utilities Commission (C.P.U.C.), pursuant to D.19-05-029, all bills are subject to a surcharge of \$0.025 per 100 cubic feet, for a 12-month period, beginning with the effective date of Advice Letter 335-W. This surcharge will recover the under-collection balance in the LIRA Program as of September 30, 2016.
- 7. As authorized by the California Public Utilities Commission (C.P.U.C.), all bills are subject to surcharge of \$0.157 per 100 cubic feet. This surcharge will amortize the shortfall in revenue between the interim rates implemented on January 1, 2018 and pursuant to Decision 19-05-029 the rates approved in Advice Letter 335-W which became effective on July 6, 2019. This surcharge shall commence on August 7, 2019 and remain in effect for an estimated 36-month period or until the shortfall in revenue is fully amortized.
- 8. A surcredit of \$0.006 per 100 cubic feet of water used is to be applied to the monthly bills of all metered customers, excluding those customers receiving a Low Income Ratepayer Assistance (LIRA) credit, commencing on the effective date of Advice Letter 359-W, for approximately 12 months period.
- 9. As authorized by the California Public Utilities Commission (C.P.U.C.), pursuant to D.21-10-024, all bills are subject to a one-time surcharge of \$0.12 per 100 cubic feet of water used, beginning with the effective date of Advice Letter 359-W. This surcharge will amortize the under-collection balance in various Memorandum and Balancing accounts.
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(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advise Letter No. 365-W

Craig D. Gott
Name

Date Filed _____

Decision No. D.21-10-024

President
Title

Effective _____

Resolution No. _____

Suburban Water Systems
 1325 N. Grand Ave., Ste. 100
 Covina, CA 91724-4044

Revised

Cal. P.U.C. Sheet No. 1843-W

Canceling Revised

Cal. P.U.C. Sheet No. 1837-W

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(Continued)

(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 365-W

Craig D. Gott

Date Filed _____

Name

Decision No. D.21-10-024

President

Effective _____

Title

Resolution No. _____