

June 10, 2022

ADVICE 131-W
(U 338-W)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
WATER DIVISION

SUBJECT: Activation of Stage 1 Mandatory Water Conservation on Santa Catalina Island

In compliance with Schedule 14.1 - Staged Mandatory Water Conservation and Rationing, Section G.1, and Rule No. 14.1 - Santa Catalina Island Fresh Water Rationing Plan, General Information 4, Southern California Edison Company (SCE) hereby submits this advice letter to request activation of Stage 1 Mandatory Water Conservation on Santa Catalina Island (Catalina).

PURPOSE

SCE respectfully submits this advice letter to notify the California Public Utilities Commission (Commission or CPUC) of SCE's activation of Stage 1 of its Mandatory Water Conservation and Rationing Plan (Water Rationing Plan) on Catalina.

BACKGROUND

SCE's Fresh Water Rationing Plan

SCE's Water Rationing Plan was first established in 1977 by Resolution W-2122 and Advice 16-W, and was later modified by Decision (D.) 90-05-033, Advice 43-W, Advice 74-W, Advice 92-W, 92-W-A, and Advice 98-W. Advice 92-W and 92-W-A, approved on August 11, 2014, updated SCE's Rule and Schedule 14.1 to conform with the now-current Standard Practice U-40-W – Drought Procedures and Resolution W-4976.¹ Advice 98-W further updated SCE's Water Rationing Plan to add four additional mandatory water conservation requirements in conformance to Resolution W-5034 and W-5041.²

¹ Resolution W-4976 Adopting Drought Procedures for Water Conservation, Rationing, and Service Connection Moratoria, February 27, 2014

² Advice 98-W was submitted with an effective date of November 22, 2015

Rule 14.1 provides that SCE shall request activation of a particular stage of the Water Rationing Plan by submitting a Tier 2 advice letter if a declaration of Mandatory Conservation and Rationing is made by SCE per the conditions in Schedule 14.1.³

Drought Declaration of Emergency

On April 12, 2021, Governor Newsom proclaimed a drought state of emergency in three counties and ordering agencies to make Californians aware of drought and encouraging actions to reduce water usage.

On May 10, 2021, Governor Newsom expanded the proclaimed drought state of emergency to a total of 44 counties.

On July 8, 2021, Governor Newsom issued Executive Order N-10-21, directing agencies to take action to bolster drought resilience and prepare for future drought impacts. Additionally, N-10-21 called on Californians to voluntarily reduce their water use by 15 percent compared to 2020 levels. Also on July 8, 2021, the Water Division sent a letter to all investor-owned water utilities, calling on them to achieve the 15 percent reduction in water use from 2020 levels as stated in the N-10-21. Accordingly, on August 20, 2021, SCE sent a letter to all Catalina water customers informing them of voluntary conservation measures on the island. SCE encouraged customers to voluntarily conserve water to preserve the island's precious freshwater resources.

On October 19, 2021, Governor Newsom expanded the proclaimed drought state of emergency to six additional counties, such that the drought state of emergency is in effect statewide.

On March 28, 2022, Governor Newsom issued Executive Order N-7-22, calling on Californians to strive to limit summertime water use and to use water more efficiently indoor and out. Additionally, Governor Newsom encouraged Californians to track the amount of water they use and measure their progress towards conservation goals.

DISCUSSION

Activation of Stage 1

SCE Water Tariff Schedule 14.1 defines the triggers for activating/deactivating certain stages of mandatory conservation and rationing based on the water level in the Middle Ranch Reservoir (MRR). Schedule 14.1 prescribes that Stage 1 be activated when the water level in the MRR drops below 600 acre-feet and supplies are not sufficient to meet normal demands. The water level in the MRR is forecast to drop below the 600 acre-feet in June 2022. Accordingly, SCE seeks approval to activate Stage 1 Mandatory Water Conservation on Catalina with an effective date of July 11, 2022.

³ Rule 14.1, General Information #3.

On May 31, 2022, SCE notified the Director of the Commission's Water Division of its intent to implement Stage 1 Mandatory Water Conservation in accordance with Rule 14.1.

On June 8, 2022, SCE provided a water utility update to the community during the Avalon City Council meeting, including the water supply status and steps to implement Stage 1 Mandatory Water Conservation.

SCE is scheduled to provide a water utility update to the community during the Avalon City Council meeting on Tuesday June 21, 2022

SCE is scheduled to hold a public meeting regarding the activation of Stage 1 at the Avalon City Council meeting on Tuesday, July 19, 2022. SCE will complete this meeting prior to imposing any penalties or fines associated with a mandatory program. SCE will provide important information on the Stage 1 mandatory conservation measures and the availability of water conservation devices.

Additionally, in 2021 SCE worked with the United States Bureau of Reclamation (USBR) on the development of a Drought Contingency Plan (DCP) for the Catalina water system.⁴ Among other things, the DCP investigated other potential trigger mechanisms for activating/deactivating stages of mandatory water conservation and rationing on the island. One such metric is changes in pumping water levels in groundwater wells throughout the island. This metric confirms the current water supply status on the island and underscores the need to activate Stage 1.

Memorandum Accounts

On January 26, 2010, SCE submitted Advice 74-W, revising SCE's conservation and rationing tariffs to conform with SP U-40-W and establishing the Catalina Water Rationing Memorandum Account (CWRMA). The Commission approved Advice 74-W on March 2, 2010 with an effective date of February 25, 2010.

On April 14, 2020, SCE submitted Advice 119-W, seeking Commission authority to establish a Catastrophic Event Memorandum Account (CEMA) for the Catalina water utility. On April 28, 2020, SCE submitted supplemental Advice Letter 119-W-A, updated the requested effective date of the CEMA to comply with the Executive Director's letter to water utilities dated March 4, 2020.⁵ On May 5, 2020, the Commission approved

⁴ As of the timing of this advice letter the USBR is still reviewing SCE's final DCP for the Catalina water system.

⁵ The March 17, 2020 letter from the Executive Director states, "These customer protections should be retroactively applied to March 4, 2020."
https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Water%20Companies%20re%20COVID-19%20March%202017,%202020.pdf.

SCE Advice 119-W-A, establishing a Catastrophic Event Memorandum Account (CEMA) for the Catalina water utility with an effective date of March 4, 2020.

Concurrent with the activation of Stage 1 mandatory water conservation on Catalina, SCE is activating both its CWRMA and CEMA. The CWRMA will record costs associated with implementing the Water Rationing Plan. The CEMA will record costs associated with unforeseen events attributable to the drought emergency.

CONCLUSION

No cost information is required for this advice letter.

This advice letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

TIER DESIGNATION

Pursuant to Rule No. 14.1, General Information No. 4; Schedule 14.1, Special Condition No. 2; General Order (GO) 96-B, Water Industry Rule 7.3.2; and in conformance with Standard Practice U-40-W,A.1, this advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

SCE requests that this advice letter be effective on July 10, 2022, in accordance with General Order 96-B, General Rule 7.3.4.

NOTICE

Anyone wishing to protest this advice letter may do so only electronically. Protests must be received no later than 20 days after the date of this advice letter. Protests should be submitted to the CPUC Water Division:

Director, Water Division
California Public Utilities Commission
E-mail: water_division@cpuc.ca.gov

In addition, protests and all other correspondence regarding this advice letter should be sent electronically to the attention of:

Connor Flanigan
Managing Director, State Regulatory Operations
Southern California Edison Company
E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

SCE is serving copies of this advice letter to the service list for interested parties shown on the attached GO 96-B service list in accordance with Water Industry Rule 4.1 of GO 96-B. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-3719. For changes to all other service lists, please contact the Commission's Process Office at (415) 7032021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the advice letter at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

In addition, SCE is complying with the customer notice provisions of Rule 3.1 (Water Utility Rule) of GO 96-B.

For questions, please contact Cooper Cameron at (626) 302-3406 or by electronic mail at Cooper.Cameron@sce.com.

Southern California Edison Company

/s/ Connor Flanigan
Connor Flanigan

CF:cc:cm
Enclosures

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

Advice Letter Cover Sheet

Utility Name: Southern CA Edison

Date Mailed to Service List: Jun. 10, 2022

CPUC Utility #: WTC 338

Protest Deadline (20th Day): Jun. 30, 2022

Advice Letter #: 131-W

Review Deadline (30th Day): Jul. 10, 2022

Tier 1 2 3 Compliance

Requested Effective Date: Jul. 10, 2022

Authorization

Rate Impact: \$

Description: Activation of Stage 1 Mandatory Water Conservation on Santa Catalina Island

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: Darrah Morgan

Utility Contact 2: Jeanette Melgar

Phone: (626) 302-2086

Phone 2: (626) 302-4039

Email: advicetariffmanager@sce.com

Email 2: advicetariffmanager@sce.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: _____

CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS

Advice Letter Cover Sheet

APPROVED

WITHDRAWN

REJECTED

Signature: _____

Comments: _____

Date: _____
