CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS

Advice Letter Cover Sheet

Utility Name: GOLDEN STATE WATER COMPANY

District: COMPANY-WIDE

CPUC Utility #: 133 W

Advice Letter #: 1894-WA

Tier ☐1 ☒2 ☐3 ☐ Compliance

Authorization

Description: Establish a Lead and Copper Rule Revisions Memorandum Account

Date Mailed to Service List: 4/10/2023

Protest Deadline (20th Day): 3/20/2023

Review Deadline (30th Day): 3/30/2023

Requested Effective Date: 3/1/2023

Rate Impact: $0.00
0%

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: Gladys Estrada
Phone: (909) 394-3600 x 527
Email: grosendo@gswater.com

Utility Contact: Brad Powell
Phone: (909) 394-3600 x 422
Email: Brad.Powell@gswater.com

DWA Contact: Tariff Unit
Phone: (415) 703-1133
Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

DATE	STAFF	COMMENTS

[ ] APPROVED [ ] WITHDRAWN [ ] REJECTED

Signature: _____ **Comments:** _____

Date: _____

Golden State Water Company
A Subsidiary of American States Water Company

FILED
APR 10 2023
PUBLIC UTILITIES COMMISSION
WATER DIVISION

April 10, 2023

Advice Letter No. 1894-WA **(U 133 W)**

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Golden State Water Company (Golden State) requests approval to implement the following tariff changes applicable to its water operations:

CPUC Sheet No	Title of Sheet	Canceling CPUC Sheet No.
Original No. 9141-W*	Preliminary Statement Lead and Copper Rule Revisions Memorandum Account, Part SSSS Page 1	
Original No. 9142-W*	Preliminary Statement Lead and Copper Rule Revisions Memorandum Account, Part SSSS Page 2	
Revised No. 9143-W*	Table of Contents, Page 2	Revised No. 9139-W
Revised No. 9144-W*	Table of Contents, Page 1	Revised No. 9140-W

Supplemental

This supplemental advice letter is being filed as a result of Water Division's staff review. GSWC has added language in the advice letter to address grant-funding options from the EPA for utilities in California. Additionally, minor language has been included to Section 4, in the Preliminary Statement, per Water Division's request. This filing will replace Advice Letter No. 1894-W in its entirety.

Purpose

Golden State is seeking authorization to establish a Lead and Copper Rule Revisions Memorandum Account (LCRRMA) to track incremental costs incurred by GSWC that are required to comply with the United States Environmental Protection Agency's (EPA) Lead and Copper Rule Revisions (LCRR) that are not otherwise covered in GSWC's authorized rates.

Background

On January 15, 2021, the EPA issued the revised LCRR. This regulation introduces several new compliance and reporting requirements for water systems in the United States, some of which must be completed by the compliance date of October 16, 2024.

The EPA's revised LCRR are to protect consumers from the impact of lead exposure in drinking water. Under the LCRR revisions, the EPA requires water systems to conduct a comprehensive inventory of both utility-owned and customer-owned service line materials. The LCRR will require Golden State to identify any portion of a service line and categorize its findings as either lead, galvanized, non-lead (including copper, plastic or steel), or lead status-unknown service lines and lines requiring replacement. GSWC will also be required to make the inventory information available publicly.

On December 16, 2021, the EPA published Docket No. EPA-HW-OW-2021-0255 in the federal register. Within the Docket, EPA committed to propose and further revise the LCRR by October 2024 with the Lead and Copper Rule Improvements (LCRI). The LCRI are expected to delay the implementation of portions of the LCRR beyond the original October 16, 2024 compliance date with the exception of the service line material inventory requirements.

The LCRI may include additional modifications and requirements to the following LCRR sections:

- Timely replacement of lead service lines
- Revised tap sampling and lead action/trigger levels
- School and Child Care Center sampling
- Public education
- Corrosion control treatment

Memorandum Account Justification

The EPA requires public and private water systems to comply with the update of the LCRR. Golden State will need to prepare all of its 38 water systems for the LCRR, focusing on the regulatory requirements that are due by the compliance date. Golden State anticipates incurring substantial costs in order to comply with the revisions. The LCRR will require a comprehensive inventory of service line materials, which requires researching and documenting state and local plumbing codes, permits and existing records or other available historic records that indicate service line materials.

Golden State is requesting to establish a Lead And Copper Rule Revisions Memorandum Account (LCRRMA), to record costs associated with the LCRR for the initial extensive study for service line material inventories and any incremental O&M expenses and carrying costs on any capital investments incurred for any additional modifications and requirements that may result from the final LCRI. Only costs that are not otherwise covered in the Golden State's revenue requirement would be tracked in the memorandum account.

The substantial costs Golden State expects to incur include for the initial comprehensive study of service line materials. This effort alone will entail, but not be limited to, the following components:

- Development of service line material inventories for each of Golden State's water systems;

- Preparation of Lead Service Line Replacement (LSLR) Plans for each system;
- Replacement of lines (if necessary);
- Prepare a Standard Operating Procedure (SOP) for development, and for ongoing maintenance, of the customer service line inventory;
- Development of sampling plans for lead and copper compliance monitoring at the taps of customers, daycares and schools for each system and replacement of lines (if necessary);
- Development of school and child care facility inventories for all of Golden State's systems, and preparation for sampling in these facilities and the cost of sampling; and
- Preparation of messaging for public education and customer notifications.

GSWC anticipates it will incur estimated costs of $325,000 for consulting services to prepare the initial study for the service line material inventories for each of its water systems for the LCRR, focusing on the regulatory requirements that are due by October 2024. GSWC anticipates it will incur additional substantial costs associated with full compliance of the LCRR due to the comprehensive, evolving scope of the revisions.

The EPA is expected to issue further improvements to the LCRR which are expected to delay the implementation of portions of the LCRR beyond the original October 2024 compliance date. The EPA is in the process of defining and establishing grant funding options for disadvantage communities and qualifying utilities in California. GSWC may pursue grant funding options for cost associated with the LCRRI, if available.

Request To Establish A Memorandum Account

In accordance with the Commission's Standard Practice U-27-W, establishing a memorandum account is conditional and in consideration with the following criteria which have been met by Golden State:

1. The event is not under the utility's control.

On January 2021, the EPA issued a revised LCRR to protect consumers from the impact of lead exposure in drinking water. Under the LCRR, the EPA requires water systems to conduct a comprehensive inventory of both utility owned and customer owned service line materials. The LCRR requires water systems to identify any lead and galvanized lines requiring replacement, or lead status-unknown service lines. The water system is required to make the inventory information available publicly. The EPA is not under Golden State's control, the requirement to comply with the revisions will result in new, unavoidable expenses for Golden State, both exceptional in nature and not under Golden State's control.

2. The event could not have been reasonably foreseen in the utility's last general rate case.

The EPA's revisions to the LCRR were issued in January 2021. On December 16, 2021, the EPA published Docket No. EPA-HW-OW-2021-0255 in the federal register. Within the Docket, EPA committed to propose and revise the LCRR by October 2024 with the Lead and Copper Rule

Improvements (LCRI). The LCRI are expected to delay the implementation of portions of the LCRR beyond the original October 16, 2024 compliance date with the exception of the service line material inventory requirements. Therefore, the expenses could not have been reasonably foreseen in Golden State's current pending general rate case (A.20-07-012) and will begin to be incurred before the next scheduled general rate case filing in July 2023.

3. The event occurred before the utility's next scheduled rate case.

Golden State's next general rate case application is not scheduled to be filed until July 2023 for Years 2025-2027. The expenses will be incurred before the next scheduled general rate case in order meet the compliance date of October 2024.

4. **The event is of a substantial nature in that the amount of money involved is worth the effort of processing a memo account.**

Golden State anticipates incurring estimated costs of $325,000 in order to initiate the service line inventory requirement in compliance with the LCRR revisions required by the EPA by October 2024. GSWC anticipates additional substantial costs will be incurred once the EPA issues the LCRI which are expected to delay the implementation of portions of the LCRR beyond the original due date of October 2024.

The LCRI may include additional modifications and requirements to the following LCRR sections:

- Field verification of lead service line inventory
- Timely replacement of lead service lines
- Revised tap sampling and lead action/trigger levels
- School and Child Care Center sampling
- Public education
- Corrosion control study and treatment

The total magnitude of costs associated with full compliance of the LCRR will undoubtedly increase due to the comprehensive, evolving scope of the rules revisions. The anticipated substantial costs are currently not included in current rates nor projected in A.20-07-012, currently pending a decision.

5. The Memorandum Account has ratepayer benefits.

Golden State's customers will benefit from the establishment of this Memorandum Account because it will allow Golden State to adequately prepare all of its water systems for compliance with the updated LCRR requirements. The revisions will concentrate on inventory of lead service lines; developing sampling plans for lead and copper compliance at customers' taps; developing of school and childcare facility inventories and sampling at these facilities; and

preparing messaging for public education and customer notifications. Compliance with the regulatory requirements of the EPA's LCRR for its water systems protects consumers from the risks and impact of lead and copper exposure in drinking water.

Memorandum Account Treatment

Golden State is aware that a memorandum account is not a guarantee of eventual recovery of expenses, nor is it carried as a regular account under the uniform system of accounts for water utilities. It is carried "off the books", as a memorandum account. Further, it is also known that Commission policy on memorandum account treatment has always been that the burden of proof of the reasonableness of expenses charged to the account is the responsibility of the utility requesting reimbursement of such costs.

Additional Authority for Requested Memorandum Account

The Commission is scheduled to approve an identical (in nature) request for authority to establish a LCRRMA for Great Oaks Water Company pursuant to A. 21-07-001 and its pending proposed Decision, which is scheduled to be voted on April 6, 2023.[1]

Tier Designation

This advice letter is submitted with a Tier 2 designation. Golden State is requesting that this filing become effective March 1, 2023 on the filing date of the advice letter.

Customer Notice

This advice letter requests the establishment of a memorandum account only, there are no rate changes being requested, therefore, a customer notice is not required.

Response or Protest

Anyone may submit a response or protest for this Advice Letter (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 grounds 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

[1] Proposed Decision Agenda ID #21359

5. The relief requested in the AL requires consideration in a formal hearing, or is otherwise inappropriate for the AL process; or
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 re-litigating a prior order of the Commission.

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.
WD 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 is:

California Public Utilities Commission
Water Division
505 Van Ness Avenue
San Francisco, CA 94102
E-mail: Water.Division@cpuc.ca.gov

On the same day the response or protest is submitted to WD, the respondent or protestant shall send a copy of the protest to Golden State Water Company, addressed to:

Golden State Water Company
Attn: Gladys Estrada
630 East Foothill Blvd.
San Dimas, CA 91773
E-mail: regulatoryaffairs@gswater.com

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 WD 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.

No individuals or utilities have requested notification of filing of tariffs. Distribution of this advice letter is being made to the attached service list in accordance with General Order No. 96-B.

Sincerely,

/s/ *Gladys Estrada*
Gladys Estrada
Regulatory Analyst

cc: Jim Boothe, CPUC – Water Division
Victor Chan, CPUC- CalPA
Richard Rauschmeier, CPUC- CalPA
Jeremy Ho, CPUC- Water Division

Preliminary Statement
Lead And Copper Rule Revisions Memorandum Account

SSSS. Lead And Copper Rule Revisions Memorandum Account (LCRRMA) (N)

1. **Purpose**
The purpose of the LCRRMA is to track and recover any incremental expenses and carrying costs on capital investments incurred by Golden State Water Company (GSWC) that are required to comply with the United States Environmental Protection Agency's (EPA) Lead and Copper Rule Revisions (LCRR) that are not otherwise covered in GSWC's authorized rates.

2. **Applicability**
GSWC expects to incur expenses related to the initial comprehensive study of service line materials that include incremental operations and maintenance (O&M) costs, and carrying costs on capital investments that may be required. Costs may include but are not limited to the following:
   - Development of service line material inventories for each of GSWC's water systems;
   - Preparation of Lead Service Line Replacement (LSLR) Plans for each system;
   - Replacement of service lines (if necessary);
   - Preparation of a Standard Operating Procedure (SOP) for the development and ongoing maintenance of the customer service line inventories;
   - Development of sampling plans for lead and copper compliance monitoring at the taps of customers, daycares and schools for each system;
   - Development of school and child care facility inventories for all GSWC's systems, and preparation for and the cost of sampling in these facilities; and
   - Preparation of messaging for public education and customer notifications.

3. **Accounting Procedure**
The LCRRMA does not have a rate component.

   a. A debit entry shall be made to the LCRRMA to record all related costs including, but not limited to, developing of service line material inventories, lead and copper sampling plans/monitoring at the taps of private customers, daycares and schools/preparation of lead Service Line Replacement plans/public messaging, education and customer notifications.

   b. Interest shall accrue to the LCRRMA 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 end-of balances.

   c. A debit entry equal to the revenue of each capital expenditure at GSWC's authorized rate of return and related expenses (including return, income taxes, ad valorem tax, depreciation, and other taxes and fees).

   d. A credit entry to transfer all or portion of the balance in the LCRRMA to other adjustment clauses for future rate recovery, as may be approved by the CPUC.

(N)

(Continued)

Preliminary Statement
Lead And Copper Rule Revisions Memorandum Account

SSSS. Lead And Copper Rule Revisions Memorandum Account (LCRRMA) (N)

4. **Effective Date**
The LCRRMA shall go into effect on the filing date of Advice Letter No. 1894-WA. The LCRRMA will remain open until one year after the completion of the LCRR.

5. **Disposition**
Disposition of amounts recorded in the LCRRMA shall be determined in GSWC's next General Rate Case. (N)

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FFFF	2018 Cost of Capital Interim Rate True-Up Memorandum Account	8007-W	
GGGG	2019 Interim Memorandum Account	8246-W	
IIII	General Ratemaking Area Balancing Account	8366-W	
JJJJ	San Luis Obispo Valley Groundwater Basin Memorandum Account	8367-W	
KKKK	Public Safety Power Shut-Offs Memorandum Account		
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RRRR	2022 Interim Rates Memorandum Account	9007-W	
SSSS	Lead and Copper Rule Revisions Memorandum Account		
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(Continued)

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The following tariff sheets contain all effective rates and rules affecting rates and service of the utility, together with information relating thereto:

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MM	Omega Chemical Corporation Superfund Site Memorandum Account	5848-W	
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TT	Los Osos Groundwater Adjudication Memorandum Account	6101-W	
UU	Santa Maria Steelhead Recovery Plan Memorandum Account	6103-W	
VV	Randall-Bold Balancing Account	6123-W	
ZZ	Low-Income Customer Data Sharing Memorandum Account	6225-W	
EEE	Credit Card Payment Program Memorandum Account	6559-W	
GGG	Tangible Property Regulations Collateral Consequences Memorandum Account	6652-W	
HHH	Catastrophic Event Memorandum Account	8484-W	
JJJ	American Recovery And Reinvestment Act Balancing Account	6938-W	
KKK	2016 Interim Rates Memorandum Account	7368-W	
MMM	Los Osos Basin Management Committee Memorandum Account		
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NNN	Basin Pumping Rights Litigation Memorandum Account	7451-W	
OOO	School Lead Testing Memorandum Account	7481-W	

Fact Sheet

USEPA Lead and Copper Rule Revisions

ENVIRONMENTAL PROTECTION AGENCY
40 CFR Parts 141 and 142
[EPA–HQ–OW–2017–0300; FRL–10019–23–OW] RIN 2040–AF15
National Primary Drinking Water
Regulations: Lead and Copper Rule Revisions:
https://www.epa.gov/ground-water-and-drinking-water/final-revisions-lead-and-copper-rule

Published on January 15, 2021, U.S. Environmental Protection Agency (EPA) finalized the first major update to the Lead and Copper Rule (LCR or Rule) in nearly 30 years. EPA's new Lead and Copper Rule Revisions (LCRR) strengthen every aspect of the LCR to better protect communities and children in elementary schools and childcare facilities from the risks of lead exposure. The new Rule will get the lead out of our nation's drinking water and empower communities through information. Over the next three years, the LCRR will require community and non-transient non-community water systems throughout the United States to conduct an inventory of service lines and determine the material of those lines and fittings. The majority of the LCRR requirements are currently scheduled to go into effect January 2024. The LCRR is scheduled to become effective on June 17, 2021, however the EPA is proposing to delay implementation until December 16, 2021. The public comment period for the LCRR ended on April 12, 2021 and EPA is now determining whether to extend the effective and compliance dates.

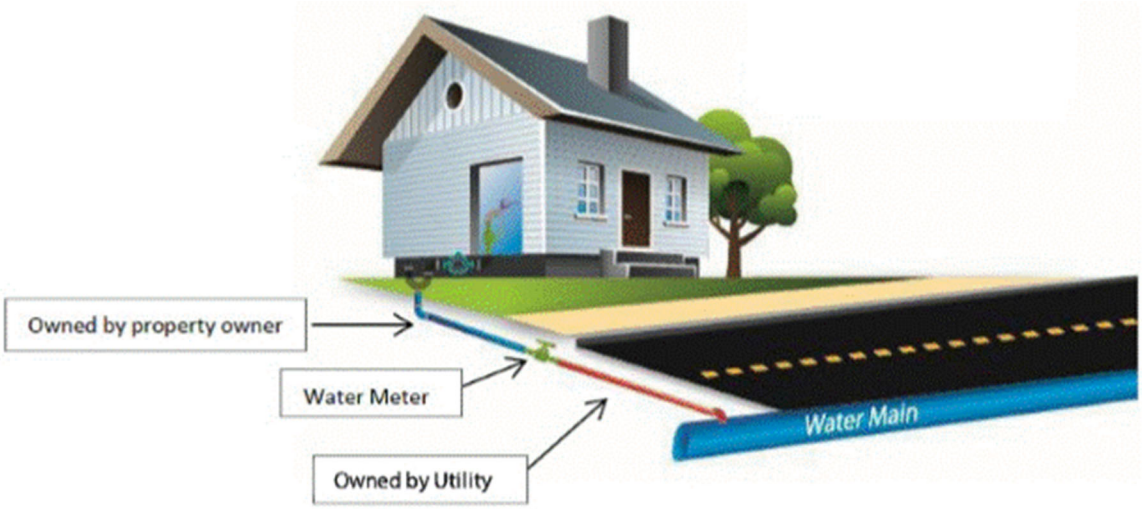
Background

In California, **Senate Bill 1398** (2016) and subsequent additions in **Senate Bill 427** (2017), updated the California Health and Safety Code to require only community water systems to conduct an inventory of lead user service lines by July 1, 2018 and submit the user service line data to the State Water Board. As demonstrated in the diagram below, the California definition of a "user service line" is the portion of the service line and fittings that are owned by the water system, from the water main to the meter. In most cases, the homeowner owns the portion of the service line that extends from the water meter to the building inlet.

In contrast to the California definition, the **LCRR define** "service line" as a pipe, including the water meter, which connects the water main to the building inlet. A service line may be owned by the water system, owned by the property owner, or both. The LCRR require **all** community and non-transient non-community water systems to complete **an inventory of service lines, regardless of ownership, by January 16, 2024**[1]. Under the LCRR, water systems will need to determine if any portion of the service line and its fittings are: lead, galvanized, non-lead, or lead

[1] If the EPA extends the LCRR effective date to December 16, 2021, then it will likely extend the inventory compliance deadline to September 16, 2024.

status unknown. A water system may want to collect more specific data on the type of material, such as copper, plastic or steel.



NOTE: Under SB 427 and previous California regulations, the sections of the service line titled *"Owned by Utility"* and the *"Water Meter"* are included in California's definition of a *"service line."* The EPA's new LCRR expands the definition of "service line" to also include "*Owned by property owner*" such that the entire line, regardless of ownership, is required to be included in a water system's inventory.

Community water systems in California have already submitted service line inventories that include the portions of the service line from the Water Main to the Water Meter. The State Water Board intends to start collecting the additional data for the remainder of the entire "service line," as defined by the LCRR, in the electronic annual report. Under the EPA's LCRR, community water systems in California **will need to inventory the privately-owned portion ("Owned by property owner") of the service line over the next three years**. Though the EPA is still currently taking public comment on its LCRR, and revisions may still happen to the LCR, its requirements regarding inventories will likely remain unchanged. California will update its regulations on required inventories so that they are consistent with the LCRR.

Moving Forward

Next Steps for water systems:

The LCRR specifically provides the following requirements to water systems to create an inventory:

> A water system must use any information on lead and galvanized iron or steel that it has identified when conducting the inventory of service lines in its distribution system. The water system service line material must be categorized with the following: lead, galvanized, non-lead (including copper, plastic, or steel) or lead status unknown.

The water system must also review the sources of information listed below to identify service line materials for the inventory. The water system may use other sources of information not listed below, if approved by the State.

- All construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials used to connect structures to the distribution system.
- All water system records, including distribution system maps and drawings, historical records on each service connection, meter installation records, historical capital improvement or master plans, and standard operating procedures.
- All inspections and records of the distribution system that indicate the material composition of the service connections that connect a structure to the distribution system.

To comply with the LCRR, the State Water Board suggests starting with an evaluation of your system's records. The water system should then consider investigating County and City construction and plumbing codes, going back as far as the beginning of your water system's construction. Interviewing County and City building inspectors would also provide valuable information. Additionally, interviewing local building contractors and plumbers to determine what type of pipe is constructed in various parts of your distribution system is an option. Please document all evaluations and interviews. Other types of identification methods currently used are scratch testing and eddy currents. Predictive modeling has also shown success in various systems.

If you are a community water system with an approved replacement plan, you will need to continue to replace the water-system-owned lead pipes, lead fittings and unknown user service lines in addition to inventorying the remainder of the entire "service line," as defined by the LCRR.

Non-Transient Non-Community water systems will need to develop an inventory of all pipe and fittings material distributing water from the source of supply to the building inlets.

Helpful information sites:

American Water Works Association (AWWA) held a webinar on what the LCRR rule changes mean for water systems in January 2021. It's free and available online here: W210128 Final Lead and Copper Rule Revisions | GoToStage.com.

The Lead Service Line Replacement Collaborative is working on updating its website based on the LCRR changes. Their website is a great resource: Preparing a Lead Service Line Inventory - LSLR Collaborative (lslr-collaborative.org). Please note that this does not reflect rule-specific requirements at this time.

(*These Facts were last updated on April 20, 2021)*

GOLDEN STATE WATER COMPANY
REGION 1, 2 & 3 – SERVICE LIST

Sacramento Suburban Water Dist.
3701 Marconi Avenue – Suite 100
Sacramento, CA 95821
HHernandez@sswd.org
DYork@sswd.org

Citrus Heights Water District
6230 Sylvan Road
Citrus Heights, CA 95610

Carmichael Water District
7837 Fair Oaks Blvd.
Carmichael, CA 95608-2405

California-American Water Co.
520 Capitol Mall, Suite 630
Sacramento, CA 95814
ca.rates@amwater.com

Cypress Ridge Owner's Association
Attn: President
1400 Madonna Road
San Luis Obispo, CA 93405

Fair Oaks Water District
10317 Fairoaks Blvd.
Fairoaks, CA 95628

City of Folsom
50 Natoma Street
Folsom, CA 95630
myasutake@folsom.ca.us

Orange Vale Water Co
P. O. Box 620800
9031 Central Avenue
Orange Vale, CA 95662

Director
Sacramento County Water Agency
827-7th Street, Room 301
Sacramento, CA 95814
DWRexecsecretary@saccounty.net

City of Antioch
P. O. Box 5007
Antioch, CA 94531

Bay Point Municipal Advisory Council
3105 Willow Pass Road
Bay Point, CA 94565-3149

City of Brentwood
Public Works Operations
James Wolfe, Water Operations Manager
2201 Elkins Way
Brentwood, CA 94513
jwolfe@brentwoodca.gov

Contra Costa Water District
P. O. Box H2O
Concord, CA 94520

Contra Costa County
Chief Assistant Clerk of the Board
651 Pine Street, Room 106
Martinez, CA 94553
Jami.napier@cob.cccounty.us

Diablo Water District
P. O. Box 127
Raley's Shopping Center – 2107 Main Street
Oakley, CA 94561-0127
Dmuelrath@diablowater.org
cbelleci@diablowater.org

Richard Lou, Principal Management Analyst
East Bay Municipal Utility District
375 – 11th Street, MS#804
Oakland, CA 94607
Rlou@ebmud.com

GOLDEN STATE WATER COMPANY
REGION 1, 2 & 3 – SERVICE LIST

City of Martinez
525 Henrietta Avenue
Martinez, CA 94553

Konocti County Water District
15844 – 35th Street
Clearlake, CA 95422
kcwd@mchsi.com

Arroyo Grande Municipal Water Dept.
P.O. Box 550
Arroyo Grande, CA 93420
staylor@arroyogrande.org

Cambria Community Services Dist.
1316 Tamson Drive – Suite 201
P.O. Box 65
Cambria, CA 93428

Los Osos CSD
2122 - 9th Street
Los Osos, CA 93402

S & T Mutual Water Co.
P.O. Box 6391
Los Osos, CA 93412
STMutualwater@gmail.com

Nipomo Community Services Dist.
147 S. Wilson Street
Nipomo, CA 93444-0326
MIglesias@ncsd.ca.gov

Calleguas Municipal Water District
2100 Olsen Road
Thousand Oaks, CA 91360
staylor@calleguas.com

City Clerk
City of Clearlake
14050 Olympic Drive
Clearlake, CA 95422
mswanson@clearlake.ca.us

Highlands Water Company
14580 Lakeshore Drive
Clearlake, CA 95422-8100

Local Agency Formation Commission
P. O. Box 2694
Granite Bay, CA 95746
j.benoit4@icloud.com

Avila Beach Community Service District
P O Box 309
191 San Miguel Street
Avila Beach, CA 93424
avilacsd@gmail.com

Community Services District
P. O. Box 6064
Los Osos, CA 93412

Morro Bay City Water (City Hall)
595 Harbor Blvd.
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