CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS

Advice Letter Cover Sheet

Utility Name:	**GOLDEN STATE WATER COMPANY**	**Date Mailed to Service List:**	**10/12/2023**
District:	**COMPANY WIDE**		
CPUC Utility #:	**133 W**	**Protest Deadline (20th Day):**	**11/1/2023**
Advice Letter #:	**1910-W**	**Review Deadline (30th Day):**	**11/11/2023**
Tier	☐ 1 ☒ 2 ☐ 3 ☐ Compliance	**Requested Effective Date:**	**1/1/2024**
Authorization	**D.23-06-025**	**Rate Impact:**	**$0 0%**
Description:	**Water Cost of Capital Mechanism-2024**		

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: Ronald Moore
Phone: (909) 394-3600 x682
Email: Ronald.Moore@gswater.com

Utility Contact: Jeff Linam
Phone: (909) 394-3600 x 664
Email: Jeff.Linam@gswater.com

Water Division 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[ ] APPROVED **[ ] WITHDRAWN** **[ ] REJECTED**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
OCT 12 2023
PUBLIC UTILITIES COMMISSION
WATER DIVISION

October 12, 2023

Advice Letter No. 1910-W **(U 133 W)**

California Public Utilities Commission

Golden State Water Company ("GSWC") hereby submits this advice letter applicable to all of its water operations.

Subject: ***Water Cost of Capital Mechanism – 2024***

Purpose

This advice letter ("AL") is submitted to adjust GSWC's authorized Cost of Capital for Year 2024.

The purpose of this AL is to propose an adjustment to GSWC's adopted cost of capital for the year 2024. California Public Utilities Commission ("Commission") Decision No. ("D") 23-06-025, Ordering Paragraph No7, authorizes GSWC to continue with its Water Cost of Capital Mechanism ("WCCM") for years 2023 and 2024, using the base year 2022. GSWC has followed the directives previously adopted in D. 09-07-051 (and continued in D.12-07-009, D.18-03-035 and D.23-06-025) to adjust its authorized cost of capital for 2024.

Background

On May 3, 2021, GSWC along with California-American Water Company, California Water Service and San Jose Water Company, filed simultaneous applications for approval of their respective proposed cost of capital for the three-year period beginning January 1, 2022. On June 29, 2023, D.23-06-025 was adopted, which adopted the cost of capital for 2022 and continued the WCCM.

Ordering Paragraphs 3 and 7 of the Decision state,

> *3. Golden State Water Company is authorized an 8.85% return on equity and a 5.10% cost of debt with a 43.00% debt to 57.00% equity ratio resulting in a 7.24% return on rate base for the calendar years 2022, 2023, and 2024.*
>
> *7. California-American Water Company, California Water Service Company, Golden State Water Company, and San Jose Water Company shall continue with their Water*

Cost of Capital Mechanism for the years 2023, and 2024, using the base year 2022 adopted in this decision.

Workpapers outlining the calculations relating to the change in the cost of capital are being submitted with this advice letter to the Commission's Water Division and to the Public Advocates Office.

Discussion

The automatic adjustment process is triggered in any year where the difference between the current 12-month October through September average Moody's utility bond rates and the existing rate benchmark exceeds the 100-basis point trigger. An automatic adjustment to GSWC's return on equity ("ROE") is made as follows:

- ROE is adjusted by one-half of the difference between the AA utility bond average for AA credit-rated utilities or higher and BAA utility bond average for BBB credit-rated utilities or lower and the current benchmark.

Long-term debt and preferred stock costs are updated to reflect actual August month-end embedded costs in that year and forecasted interest rates for variable long-term debt and new long-term debt and preferred stock scheduled to be issued.

Adopted Cost of Capital

D.23-06-025 approved the following capital structure, cost of equity, cost of debt and rate of return for GSWC for the base year 2022:

Golden State Water Company Adopted Base Year 2022					
	Cost of Equity	Cost of Debt	Capital Structure	Rate of Return	
	8.85%	5.10%	43.00% debt, 57.00% equity	7.24%	

2023 Adjusted Cost of Capital

On June 30, 2023, GSWC filed Advice Letter No. 1897-W to adjust the 2023 cost of capital based on water cost of capital mechanism triggering higher than the benchmark by 103 basis points. Incorporating the new ROE into the authorized cost of capital results in a revised total rate of return on rate base of 7.53%, an increase of 29 basis points from its previous authorized level of 7.24%. Advice Letter No. 1897-W became effective on July 31, 2023.

Golden State Water Company Adopted Base Year 2023					
	Cost of Equity	Cost of Debt	Capital Structure	Rate of Return	
	9.36%	5.10%	43.00% debt, 57.00% equity	7.53%	

2024 Proposed Cost of Capital

The comparison between the October 2022-September 2023 12-month average AA utility bond rate of 5.31%, and the benchmark of 3.91%[1], is a difference of 140 basis points. Because this difference is greater than 100 basis points, an automatic cost of capital adjustment is triggered. The result of the trigger is a ROE adjustment upward by one half that amount, or 70 basis points, to 10.06% from 9.36%. GSWC's long-term debt cost adopted in D.23-06-025 is unchanged.

Incorporating the new ROE into the authorized cost of capital results in a revised total rate of return on rate base of 7.93%, an increase of 40 basis points from its previous authorized level of 7.53%.

Golden State Water Company Proposed Base Year 2024					
	Cost of Equity	Cost of Debt	Capital Structure	Rate of Return	
	10.06%	5.10%	43.00% debt, 57.00% equity	7.93%	

The updated rate of return will be incorporated in the 2024 escalation year advice letters that will be filed separately by November 17, 2023.

Tier Designation

This advice letter is submitted with a Tier 2 designation.

Effective Date

GSWC requests that this filing become effective on January 1, 2024.

Response or Protest

Anyone may submit a response or protest for this Advice Letter. 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
5. The relief requested in the AL requires consideration in a formal hearing, or is otherwise inappropriate for the AL process; or

[1] The benchmark was updated in Golden State Water Company's Advice Letter No. 1897-W.

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: Marcus Gomez
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/ Ronald Moore

Ronald Moore
Regulatory Affairs Department

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

GOLDEN STATE WATER COMPANY
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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

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
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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
P. O. Box 5038
Bay Point, CA 94565

City of Brentwood
Public Works Operations
James Wolfe, Water Operations Manager
2201 Elkins Way
Brentwood, CA 94513-7344
jwolfe@brentwoodca.gov

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

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

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

Phoebe Grow
East Bay Municipal Utility District
375 – 11th Street, MS#804
Oakland, CA 94607
phoebe.grow@ebmud.com

City of Martinez
525 Henrietta Avenue
Martinez, CA 94553

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

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

GOLDEN STATE WATER COMPANY
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191 San Miguel Street
Avila Beach, CA 93424
avilacsd@gmail.com

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

Morro Bay City Water (City Hall)
595 Harbor Blvd.
Morro Bay, CA 93442
eriddiough@morrobayca.gov
pnewman@morrobayca.gov

San Luis Obispo City Water
879 Morro Street
San Luis Obispo, CA 93403
chenderson@slocity.org

City of Santa Maria
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Ventura County Water Works
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7150 Walnut Canyon Road
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Sharon.Hurault@Ventura.org

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mswanson@clearlake.ca.us

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

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

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

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P. O. Box 326
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Guadalupe, CA 93434

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Bellflower, CA 90706

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Director of Public Works
P. O. Box 90241-7016
Downey, CA 90241

City of Huntington Park
Water Department
6550 Miles Street
Huntington Park, CA 90255

City of Lakewood
Water Department
P.O. Box 220
Lakewood, CA 90714-0220

Long Beach Water Department
Chris Garner, General Manager
1800 Wardlow Road
Long Beach, CA 90807

City of Los Angeles
Department of Water & Power
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Los Angeles, CA 90051-0100

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Sacramento, CA 95812

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San Luis Obispo, CA 93408

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Cerritos, CA 90703

City of Hawthorne
4455 W. 126th Street
Hawthorne, CA 90250

City of Inglewood
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P. O. Box 6500
Inglewood, CA 90301

City of Long Beach
Water Department
1800 E. Wardlow Road
Long Beach, CA 90807-4994

Honorable Mayor Karen Bass
City of Los Angeles
200 N. Spring Street – Room 303
Los Angeles, CA 90012

City of Norwalk
Water Department
12700 Norwalk Blvd. – Room #5
Norwalk, CA 90650

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16420 Colorado Street
Paramount, CA 90723
sho@paramountcity.com

City of Santa Fe Springs
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Santa Fe Springs, CA 90670

City of South Gate
Water Department
8650 California Street
South Gate, CA 90280
rdickey@sogate.org
ccastillo@sogate.org

City of Torrance
Water Department
3031 Torrance Blvd.
Torrance, CA 90503

City of Whittier
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Whittier, CA 90602

California Water Service Co.
2632 West 237th Street
Torrance, CA 90505-5272
mduque@calwater.com

California Water Service
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Maywood Mutual Water - No. 2
3521 East Slauson Street
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Maywood Mutual Water - No. 3
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Orchard Dale County
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Pico County Water District
P. O. Box 758
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San Gabriel Valley Water Co.
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Robert Kelly, VP of Regulatory Affairs
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Tract 180 - Mutual Water Co.
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Cudahy, CA 90201
Tract180@hotmail.com

Water Replenishment District
4040 Paramount Blvd.
Lakewood, CA 90712-4127
General Manager: stucker@wrd.org
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General Manager
6252 Telegraph Road
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GOLDEN STATE WATER COMPANY
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Santa Ana, CA 92702

County Counsel
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Santa Ana, CA 92701

County of LA Waterworks Dist.
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Apple Valley, CA 92307

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

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California Dept. of Forestry
7105 Airway Drive
Yucca Valley, CA 92284

California Dept. of Forestry Hdqtrs
3800 N. Sierra Way
San Bernardino, CA 92405

Daggett Community Service
P.O. Box 308
Daggett, CA 92327

County Water
222 W. Hospitality Lane, 2nd Floor
San Bernardino, CA 92408

East Orange County Water
185 N. McPherson Road
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Bruce Youngblood: dyoungblood@eocwd.com
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Imperial County Board of Supervisors
Attn: Supervisor John Hawk, District 5
County Administration Center
940 W. Main St, #209
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Jurg Heuberger, CEP, Executive Officer
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Park Water Company
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Rancheritos Water Co.
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San Gabriel County Water Co.
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Seeley County Water District
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Seeley, CA 92273

Serrano Water Dist. – Villa Park
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Villa Park, CA 92667

Sheep Creek Water Company
P. O. Box 291820
Phelan, CA 92329-1820
Attn: Chris Cummings
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REGION 1, 2 & 3 – SERVICE LIST

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Ken@sunnyslopewater.com
Karen@sunnyslopewatercompany.com

Victor Valley Water District
17185 Yuma Street
Victorville, CA 92392

Westmorland Water Company
P.O. Box 698
Westmorland, CA 92281

City of Anaheim
City Clerk's Office
200 S. Anaheim Blvd. – Suite 217
Anaheim, CA 92805

City of Alhambra Utilities Dept.
111 S. First Avenue
Alhambra, CA 91801

City of Brea
Water Department
#1 Civic Center Drive
Brea, CA 92621

City of Calexico Water Co.
608 Heber Avenue
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City of El Centro Water Co.
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El Centro, CA 92244

City of Fullerton Water
Fullerton Water Department
303 W. Commonwealth Avenue
Fullerton, CA 92631
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City of Glendora
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Glendora, CA 91740

Twentynine Palms Water District
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Walnut Valley Water District
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Ms. Carol Goss, Chair
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Heber Public Utility District
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City of Imperial
Water Department
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City of La Palma
7822 Walker Street
La Palma, CA 90623
Attn: Jeff Moneda, PW Director

City of La Verne
Water Department
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mmcwade@cityoflaverne.org
rjmartinez@cityoflaverne.org
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Monte Vista Water District
10575 Central Avenue
Montclair, CA 91763

City of Monterey Park Water Co.
320 W. Newmark Avenue
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rgonzales@montereypark.ca.gov

City of Monrovia Water Company
415 S. Ivy Avenue
Monrovia, CA 91016

City of Orange
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City of Santa Ana Water
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REGION 1, 2 & 3 – SERVICE LIST

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REGION 1, 2 & 3 – SERVICE LIST

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