

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 21, 2018

To: ALL CLASSES (A, B, C and D) WATER AND SEWER UTILITIES

Chapter 3, Article 5 of the Public Utilities Code and General Order (G.O.) No. 104-A grants authority to the Public Utilities Commission to require all public utilities doing business in California to file reports as specified by the Commission of the utilities' operations.

The Annual Report templates for the calendar year 2018 can be accessed from the Commission's website at <http://www.cpuc.ca.gov> by clicking Water Division under Utilities & Industries, learn more under Annual Reports, and go to Templates & Forms. Type in the following for a direct link. <ftp://ftp.cpuc.ca.gov/waterannualreports/Water%20Division/Annual%20Reports/Templates%20%26%20Forms/2018/>

Your company is hereby directed to complete and return two signed, original hard copies of the 2018 Annual Report to the Commission no later than March 31, 2019. Your company is also directed to complete and return via e-mail an electronic version (in Microsoft Excel format) of the completed 2018 Annual Report to the Commission no later than May 1, 2019.

For those water utility companies with multiple Districts, your company is directed to file a District Annual Report for each District in the same way specified above.

Any request for an extension to file the 2018 Annual Report shall be in writing to the address below or email request to Bruce DeBerry at bmd@cpuc.ca.gov

For Class D and Sewer Utilities Only: A specified Annual Report for the calendar year 2018 filing is enclosed. On page 1 of 1 of the Annual Report, please indicate on the first line your type of organization – C corporation, S corporation, partnership, LLC or Individual owner. If your company is experiencing difficulties in filing an electronic Microsoft Excel version of the 2018 Annual Report, please include a signed letter along with the hard copies of your company's Annual Report explaining the underlying reasons and requesting a waiver for the electronic version of the 2018 Annual Report. Your request for a waiver will be granted only if you provide valid and convincing justification.

Address your report(s) to: California Public Utilities Commission
Water Division
Attention: Bruce DeBerry, Manager
505 Van Ness Avenue, Room 3106
San Francisco, CA 94102

If any updates or corrections are made to the figures presented in the submitted Annual Report, then a signed cover letter providing a written explanation of the update/change to the data affected, as well as the pages (marked Revised) shall be submitted to the above address within 30 days of the revision. An electronic version of the cover letter (in Microsoft Word format) and the revised pages (in Microsoft Excel format) shall be e-mailed to the Water Division.

The Commission staff cautions filers against the indiscriminate use of Public Utilities Code Section 583 to classify as “confidential” information contained in the Annual Report. It has been the long-term practice of this Commission to release Annual Reports to the public upon request.

Annual Reports are public records, and, as such, if they fail to fall within the provisions of General Order (G.O.) No. 66-C or the exemptions of the California Public Records Act (Government Code Section 6250 et seq.), they are required to be available for public inspection. Even those records which are exempted from public inspection can be made public upon the determination of the Commission that the public interest for purpose of disclosure outweighs the confidentiality of such records (see Section 6255 of the Government Code).

The policy of the California Public Records Act and the practices of this Commission favor making public records readily available to the public. Accordingly, if your company plans to claim confidential status for any information submitted in the company’s report, Commission staff advises that any such claim be prominently noted and supported by a detailed explanation of the reasons and facts that substantiate the necessity for confidential treatment. For example, you may cite G.O. No. 66-C, Section 2.2(b), which exempts from disclosure certain information, which if revealed, would place the regulated company at an unfair business disadvantage. The mere allegation of being placed in an unfair business disadvantage is not enough to establish it as a fact. More factual support demonstrating that the disadvantage resulting from disclosure of the information is required. Of course, data publicly exposed in other contexts (e.g. Corporation Annual Reports, Securities and Exchange Commission disclosure filings) should not be claimed to be confidential information when submitted.

If certain data included in the Annual Report are confidential, your company may file a request for confidential treatment of such data by following these procedures: The utility shall file two signed copies of the full and complete version of the report and two signed copies of the report with the claimed confidential information removed and the term “REDACTED” inserted in the blank area. The electronic version of both reports (i.e., confidential version and public version) should also be filed with the Water Division in the same way as directed in the preceding paragraphs. Requests by the public to review documents for which confidential treatment has been requested shall be handled pursuant to the provisions of G.O. No. 66-C.

If you have any questions concerning the 2018 Annual Report, please contact Ramon Go at (415) 703-1350 or rhg@cpuc.ca.gov

Sincerely,



Bruce DeBerry, Manager
Water Division

Enclosure(s) (for Class D Water and Sewer Utilities only)