

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 7, 2020

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 authorized 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 2019 can be accessed from the Commission's website at <ftp://ftp.cpuc.ca.gov/waterannualreports/> or for a direct link to the templates, <ftp://ftp.cpuc.ca.gov/waterannualreports/Water%20Division/Annual%20Reports/Templates%20%26%20Forms/>

Your company is hereby directed to compete and return the electronic version of the 2019 Annual Report (in Microsoft Excel format) via e-mail to Bruce DeBerry at bmd@cpuc.ca.gov and return two signed, original hard copies of the Annual Report (in PDF format) by post to the address below.

California Public Utilities Commission
Water Division
Attention: Bruce DeBerry, Manager
505 Van Ness Avenue, room 3200
San Francisco, CA 94102

The Annual Report (electronic version and hard copies) are due on or before March 31, 2020. Any request for extension to file the 2019 Annual Report shall be made in writing and addressed to Bruce DeBerry.

If any updates or corrections are made to the submitted 2019 Annual Report, a signed cover letter explaining the update/change, the pages (marked Revised) shall be submitted to the above address within 30 days of the revision. Both electronic version and hard copies shall be provided to the Water Division.

For Class D Water and Sewer Utilities Only: A specified Annual Report for the calendar year 2019 is enclosed. Please indicate on the cover page your type of organization (C corporation, S corporation, Partnership, LLC or Individual owner). If your company cannot provide an electronic version of the 2019 Annual Report, please provide a signed letter along with the hard copies explaining the underlying reasons and request a waiver for the submission of the electronic version.

The Commission staff cautions filers against the indiscriminate use of Public Utilities Code §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 G.O. No. 66-C or the exemptions of the California Public Records Act (Government Code § 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 (Government Code § 6255).

The policy of the California Public Records Act and the practices of the 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, § 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 on other contexts (e.g. Corporation Annual Reports, Securities and Exchange Commission disclosure filings) should not be claimed to be confidential information when submitted.

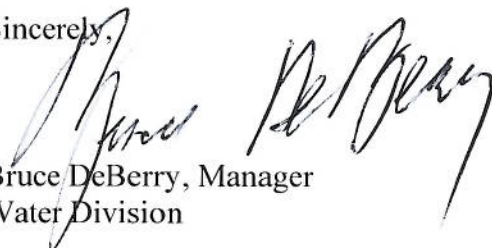
If certain data included in the Annual Report are confidential, your company may file a request for confidential treatment of such data by following these procedures:

1. The utility shall file two signed copies of the full and completed 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.
2. 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 stated previously.
3. 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.

The template has protected sheets whereby the total amounts are automatically carried forward or transferred to the utility plant, capitalization, income, expenses or other data accounts. Accordingly, it is recommended that you input data starting with the last Schedule and working your way back to Schedule A.

If you have any questions concerning the 2019 Annual Report filing, please contact Ramon Go at (415) 703-1350 or at rhg@cpuc.ca.gov

Sincerely,



Bruce DeBerry, Manager
Water Division

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