

DRAFT SUMMARY

Legend: DRA stands for Division of Rate Payer Advocates
 CWA stands for California Water Association
 ALJ stands for Administrative Law Judge Division

WAP stands for Water Action Plan
 RCP stands for Rate Case Plan
 GRC stands for General Rate Case
 OIR stands for Order Instituting Rulemaking

Version: 9/15/2006

		Issues	DRA	Joint Signatories	CalAm	CWA	Golden State	Great Oaks	Mono Lake Committee	Park	Suburban	San Gabriel
1	A B C	WAP - workshops and rulemaking	<p>Recommends using workshops to scope for rulemaking and using formal Commission rulemaking to facilitate implementing objectives of WAP (pp 1-3)</p> <p>Recommends using workshops and formal Commission rulemaking to facilitate implementing objectives of WAP (p.3)</p>		<p>Workshops would be beneficial to further discuss and refine the suggestions made by itself and other participating parties (p.6)</p>	<p>CWA not in favor of workshops in general. (p.7)</p>				<p>Park supports use of workshops (p.4)</p> <p>*****</p> <p>Reply to CWA: disagrees with CWA that workshops are not helpful. (p.1)</p>		<p>*****</p> <p>Workshops and new formal Commission rulemaking proceeding unnecessary. Workshops time consuming, benefits not commensurate with time. (p.9) Also inviting public input on what to include in GRCs is unnecessary and inappropriate to incorporate WAP into RCP. Written comment format is superior to workshop format. (p.10)</p>
2	A B C	WAP - workshops and rulemaking	<p>*****</p> <p>Reply to objections to workshops: DRA believes a professional facilitator can save everyone time by structuring a dialog to forge shared commitments to revise RCP and implement WAP. (p.2)</p> <p>*****</p> <p>Remove deficiency review, General Office Expenses, earnings test, and discovery from rulemaking because they were resolved in earlier proceedings. (p.4)</p>		<p>*****</p> <p>Reply to DRA: Objects to DRA's proposal to wait to open rulemaking to address WAP objectives. (p.1)</p> <p>Objects to DRA's view that implementation of WAP objectives is best achieved by establishing rules, regulations, and guidelines. Rules approach is too "one size fits all". Different methods to meet WAP objectives is best achieved in individual GRCs and not by rules. (p.1)</p>	<p>*****</p> <p>Reply to DRA: Objects to DRA's rulemaking approach for WAP as too one size fits all. (p.2)</p> <p>*****</p> <p>Reply to DRA: workshops not necessary in the early stages because OIR will identify issues to be addressed. However workshops may be helpful in the end stages of an OIR. (p.3)</p> <p>*****</p> <p>Reply to DRA: Rulemaking is proper procedure to consider changes to procedural aspects of RCP. Objects to DRA's preference for a combined RCP/WAP rulemaking as it may be too broad. (p.1)</p>			<p>*****</p> <p>Rulemaking could be useful for Phase Two items on Joint Signatories comments, but action on Phase One items should be taken more quickly. Urge Water Division to work with DRA and utilities to provide leadership to conserve water. (p.3)</p>			
3	A A B	WAP - implementation procedure	<p>Prefers handling more complex WAP objectives separately from GRCs. (p.3)</p>							<p>Recommends advice letter process to implement WAP objectives (p.1)</p> <p>*****</p> <p>Reply to DRA: Disagrees with DRA. GRC proceeding is the best process to implement WAP objectives, giving most comprehensive consideration of each company's unique characteristics. OIR should not be used to implement WAP. (p.2)</p>		

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4	A A C C	WAP - outlining objectives								Water Division should provide outline of WAP objectives that are specifically applicable to Class A water companies (p.1)		
5	A A C C	WAP - power use reduction						Concerned about WAP proposal to require mandatroty reduction of 10% in power in operating its water system every three years. (p.1) Great Oaks' power cost is already at realistic minimum. (p.2)				
6	A A B C	WAP - drafting an OIR	Recommends OIR be developed and framed by involving Legal, ALJ or Strategic Planning Division. (p.3)									
7	A A B C	WAP - using an OIR	Recommends assigning an ALJ to a rulemaking proceeding to consider revisions to the RCP as needed and best methods to implement the WAP. (p.4)							***** Reply to DRA: OIR is not necessary or required to implement WAP objectives because Commission already adopted WAP. (p.1)		