

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Consider Revisions to the General Rate
Case Plan for Class A Water
Companies.

R.06-12-016

**OPENING COMMENTS
OF THE DIVISION OF RATEPAYER ADVOCATES**

Pursuant to Rule 6.2 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Rules") and the schedule set forth in the Assigned Commissioner and Administrative Law Judge's ("ALJ") Scoping Memo and Ruling issued on January 29, 2007, the Division of Ratepayer Advocates ("DRA") files its opening comments in Rulemaking 06-12-016 ("OIR" or "Rulemaking"). DRA's comments address the issues set-forth in the Scoping Memo.

In this proceeding, the Commission seeks to revise and to refine the current Rate Case Plan for Class A water utilities adopted in D.04-06-018. In a cooperative effort to develop procedures that would work for all parties in the general rate case process, representatives of the DRA, California Water Association ("CWA"), and individual Class A water companies (collectively, the "Parties"¹) met informally on several occasions beginning in January 2007. The Parties discussed issues related to the OIR's proposed RCP and were able to develop a joint proposal on a number of these issues. The Parties' joint proposal on these issues is included in Attachment 1, hereto. (Attachment 1 is a mutually-approved document to which all the Parties have agreed and have attached to their separate comments on the OIR.) The Parties jointly recommend that the

¹ In addition to DRA, CWA, and the CWA member utilities, representatives of Park Water Company also participated in the informal meetings.

Commission incorporate the joint proposal described in Attachment 1 into the final Rate Case Plan adopted in this proceeding. The Parties have not been able to develop joint proposals on the remaining issues raised by the Rate Case Plan proposed in the OIR. With respect to these issues, DRA provides its comments below. However, the Parties will continue their discussions of RCP issues and may have further proposals with their reply comments or later in the proceeding.

I. SUMMARY

While DRA now has sufficient resources to process Class A Water Utilities' General Rate Cases ("GRC") under the existing Rate Case Plan ("RCP") and would prefer to continue to process the GRCs under this plan, DRA acknowledges the Commission's desire to streamline regulatory processes. In that light, DRA reviewed Appendix A of the Rulemaking and agrees generally with the following provisions of the proposed rate case plan:

- With limited exceptions, the RCP schedule should require multi-district utilities to file comprehensive GRCs for all districts at the same time.
- The schedule for Public Participations Hearings ("PPH") should provide sufficient time for utilities using bimonthly billing to notify customers of a proposed rate increase in a GRC.
- Adding a Technical Conference will assure that Water Division and all parties understand the ratemaking models used.
- The Commission should appoint an independent water quality expert to offer evidence in the GRC regarding the water utility's water quality compliance.

DRA recommends the Commission make certain changes to the proposed Rate Case Plan to assure that DRA can adequately conduct the work. These changes include:

- Modifying the order some utilities will file their GRC applications.
- Requiring Cal Am's Monterey District to be handled as a separate district.

- Changing the 20-month schedule to address certain concerns and to assure staff will be available to process subsequent 20-month applications.
- Requiring that cost of capital continue to be handled through the utilities' GRC applications.
- Expanding the Minimum Data Requirements to assure that DRA obtains the data it needs to conduct a timely and comprehensive review of the GRC applications or, in the alternative, requiring that a revised Master Data Request continue to be used for deficiency review purposes.
- Continuing to require a Commission decision for all interim rate relief requests.
- Adding a fifth criterion, the agreement of DRA, to the proposed process for allowing certain utilities to file their general rate cases by Advice Letter.

In addition to the changes proposed by DRA, as discussed above, the Joint Parties also recommend that the Commission make certain changes to Appendix A of the Rulemaking. These changes include:

- Changing the waiver provisions to allow a utility to waive a triennial GRC filing for a period that is less than three years if there is a written agreement between the Class A water utility and DRA, and to allow a utility that does not meet the specified conditions in Appendix A, Section V.2. to file its GRC by advice letter, if there is a written agreement between the Class A water utility and DRA.
- Revising the January 14-month schedule to addresses problems parties had experienced in past GRCs.
- Requiring Class A water utilities to continue water loss audits as they currently do using the existing BMP 3, unless revisions are made to the new BMP 3, currently being considered by California Urban Water Conservation Council ("CUWCC"), to account for the limited capital planning horizon of investor-owned utilities.

- Making the Alternative Dispute Resolution process optional after the initial meeting.

DRA recommends that the Commission establish any new Rate Case Plan resulting from this Rulemaking as a Pilot Plan. DRA notes that the Commission is processing this Rulemaking on a short timeframe although the issues addressed in the Rulemaking are complex and can have far-reaching effects if not adequately planned. DRA has not yet developed all of the internal processes and procedures needed to process a 24-district rate case at one time. Parties may learn that processing a 24-district GRC is unworkable in the time provided, or other issues may develop. Establishing any new rate case plan as a Pilot Plan will allow parties to learn from experience and make alterations to the plan as lessons are learned.

II. SINGLE RATE CASE FOR MULTI-DISTRICT UTILITIES

As set forth in Appendix A of the Rulemaking, the Commission-proposed rate case schedule would require a multi-district water utility to file a comprehensive general rate case application for all districts at the same time once every three years. The Commission defines a multi-district company as a company with two or more districts. This proposal affects five of the nine Class A water companies: California Water Service Company (“Cal Water”), California American Water Company (“Cal Am”), Golden State Water Company (“Golden State”), San Gabriel Valley Water Company (“San Gabriel”), and Park Water Company/Apple Valley Water Company (“Park”).

The Commission proposes to process all of the multi-district companies except Park on a 20-month schedule. The Commission proposes to process the remaining companies on a 14-month schedule that is similar to the existing RCP schedule for single district filers, but with some modifications.²

² The Rulemaking’s proposed schedule differs from the existing rate case plan schedule for single districts in three ways. It sets the public participation hearings to occur between 60 to 110 days from the date the application is filed, it schedules a technical conference with Water Division at 170 days, and it adds an ADR process, which begins before rebuttal testimony is issued. The existing RCP schedules the public participation hearings on dates 5 to 75 and did not provide for a technical conference.

A. DRA has sufficient staff to process Class A Water Utilities' GRCs under the current Rate Case Plan

When DRA implemented the new Rate Case Plan ordered in D.04-06-018, DRA experienced a difficult period transitioning to the new workload and difficulties in getting the additional staff, authorized by the Legislature in AB 2838. Until recently, when the new staff positions were finally approved and new personnel were hired, DRA did not have the resources to implement the existing Rate Case Plan.

As of July 1, 2006, DRA was authorized to fill sufficient positions to adequately staff the existing Rate Case Plan. Five new employees have joined DRA Water Branch since then, and three vacancies remain to be filled. Under that staffing plan, DRA has sufficient resources to implement the existing Rate Case Plan.

B. DRA is concerned that having a single rate case for multi-district utilities may lead to state-wide rates.

DRA's most significant concern with the Commission's proposal to have a single rate case for multi-district companies is that this could be the first trigger initiating a movement in water utilities requesting state-wide rate consolidation.³ DRA strongly opposes state-wide rates for water utilities. Establishing conditions for statewide rates would send the wrong price signal to consumers and cause costs to be unfairly distributed across customers: customers in lower cost areas would subsidize customers in higher cost areas. To subsidize rates in high cost areas may result in encouraging development in environmentally unsustainable locations. DRA strongly recommends that the

³ Unlike the transmission and distribution systems of energy companies, generally the water utility transmission and distribution systems are not interconnected. It is not easy to move water from one location to another. In addition to high costs, and lack of necessary interconnections, water rights issues also make transfers difficult. The cost of service for water utilities is very regional in nature. It significantly relies on individual circumstances that are primarily driven by local conditions unique to each district. For example, water companies are capital intensive, and under cost of service ratemaking, the capital investment costs to install infrastructure are allocated across the customers in each district. Finally, unlike electricity where it is generally possible to generate more, water is a natural resource in limited supply. There are environmental impacts to using more and more water.

Commission preserve the integrity of district-specific rate structures, regardless of how GRC applications are processed.⁴

C. If the Commission seeks to develop a streamlined regulatory process for Class A Water Utilities' GRC applications, DRA recommends certain changes to the proposal set forth in Appendix A of the Rulemaking.

To respond to the Commission's objective to streamline its regulatory processes, DRA reviewed the proposed rate case plan to determine what changes the Commission would need to make to assure that DRA could still conduct a comprehensive review of the water utilities' rate requests under the proposed schedule. DRA needs adequate time to perform a comprehensive review of revenue requirements, cost allocation and rate design, particularly for plant additions and cost of capital. Especially now that the Commission has ordered an investigation into water conservation rates under I.07-01-022, the workload for DRA to evaluate rate designs in the GRCs will increase in time and complexity significantly from past practice.

DRA evaluated the Commission-proposed 20-month schedule for performing general rate cases for multi-district companies. DRA evaluated its ability to re-tool its processes and to consider alternative ways of evaluating cases. In the past, the maximum number of districts that DRA Water handled in a single filing was a fifteen-district Cal Water case in 2001. Consequently, DRA does not have recent experience processing more than that number of districts. There are unknowns in considering all the complexities that may occur under a new time schedule.

DRA also explored various compromise solutions with the water utilities during this OIR that would be workable for all. While parties were not able to agree on details of an overall schedule in the time allowed, significant progress was made in understanding and taking into consideration mutual concerns and constraints.

⁴ DRA recommends that if the Commission wishes to consider statewide rates for water utilities, that this issue be litigated in a separate proceeding.

With two exceptions, DRA recommends that the Commission process all multi-district companies on the 20-month schedules set forth in Attachment 2. DRA agrees with the Commission that Park can be processed on the shorter 14-month schedule due to its size. DRA, however, proposes the Commission process only eight of Cal Am's nine districts and its General Office on the 20-month schedule. DRA recommends the Commission process Cal Am's Monterey District separately on a 14-month schedule, due to the complexities of that district, for the next two GRC cycles or until Cal Am's proposed Coastal Water Project or other long term water supply solution comes online.

DRA recommends some modifications to the 20-month schedule proposed in the Rulemaking. DRA made the following adjustments to the 20-month schedule:

- DRA shortened the overall schedule to assure that staff would be done with hearings and opening briefs in time to begin work on the next 20-month application. Because DRA typically works with interveners involved in the proceeding, DRA did not schedule a separate testimony date for interveners, which results in shortening the overall schedule.⁵
- DRA moved the rebuttal testimony due date to occur before the Alternative Dispute Resolution (“ADR”) or settlement process begins to assure there is an adequate record to settle and to assure a more efficient settlement process.
- DRA allowed more time for ADR or settlement discussion. Past experience has shown that there has not been sufficient time under the existing rate case schedule for settlement discussions.
- DRA extended the time for preparing opening and reply briefs to recognize that parties may be writing briefs on 24-districts and to accommodate the need for additional time preparing joint comparison exhibits on multi-district companies.

⁵ The Commission proposed 20-month schedule had rebuttal testimony due 30 days after the last party filed testimony. DRA's proposed schedule has rebuttal testimony due 28 days after DRA and other parties file their testimony.

DRA concurs that single district companies and Park can be processed on the Commission-recommended 14-month schedule with some modifications. As previously mentioned, DRA also recommends the Commission process Cal Am's Monterey District separately using the DRA proposed 14-month schedule.

DRA recommends that the Commission continue to have both January and July filers under the 14-month schedule. While initially there were issues surrounding the use of fiscal year data in some of the previous July filings, these problems have been resolved. DRA's proposed 14-month schedules are included in Attachment 2.⁶ DRA has modified the 14-month schedule included in the Rulemaking in the following ways:

- DRA moved the Public Participation hearings ("PPH") hearings back to the existing rate case plan schedule so they take place between 5 and 75 days after the application is filed. Under the proposed schedule, PPHs could occur after DRA has issued its report, which would not permit DRA to investigate issues that may be raised at the PPHs. DRA understands that the Commission proposed holding PPHs later to accommodate bimonthly billing. However, DRA believes that all single district companies and Park have monthly billing and this change is not needed for these filers.
- DRA moved the rebuttal testimony due date to occur before ADR or the settlement process begins to assure there is an adequate record to settle and to assure a more efficient settlement process.
- DRA allowed more time for ADR or for settlement talks. Past experience has shown that there has not been sufficient time under the existing rate case schedule for settlement discussions.
- In the January 14-month schedule, DRA allowed 21 days for opening briefs and 14 days for reply briefs to ensure there is adequate time for parties to prepare their briefs. Under the existing schedule parties often request more time to respond, and typically, it takes longer than the allowable time for

⁶ DRA's proposed January 14-Month schedule included in Attachment 2 is the same as the January 14-Month schedule included in the Parties' Joint Proposal (Attachment 1).

the parties to develop the joint comparison exhibits. In the July 14-month schedule, DRA allowed an additional 7 days for each brief to accommodate for the holidays.

- DRA’s schedule provides the ALJ 90 days to develop the proposed decision instead of 83 days.
- DRA expanded the overall schedule from 280 days to 298 days.

DRA’s proposed workplan assumes that DRA will process two single-district water company applications and one multi-district application most calendar years.⁷ This layout of the work uses the assumption that the same DRA team will be evaluating each of the single district water company applications. To accommodate these staffing and workload issues, DRA proposes some modifications to the Class A Water Company Schedule provided in Appendix A to the Rulemaking:

- DRA moved the Great Oaks filing earlier in the process, and switched it to a July filing date, (from January 5, 2008 to July 1, 2007, and from January 5, 2011 to July 5, 2010).
- DRA moved the Valencia filing earlier and switched it to a July filing date (from January 5, 2010 to July 1, 2009 and from January 5, 2013 to July 1 2012).

As discussed above, DRA recommends that the Rate Case Plan resulting from R.06-12-016 be established as a pilot, such that the parties can learn from experience and make alterations to the Rate Case Plan as lessons are learned.

III. NOTICE OF RATE INCREASES FOR UTILITIES WITH BIMONTHLY BILLING

To provide sufficient time for utility applicants using bimonthly billing to notify customers of a proposed rate increase in a GRC, the Commission proposes to modify the current Rate Case Plan to hold public participation hearings later in the rate case plan

⁷ DRA will process three single-district GRC and one multi-districts on years when Cal Am Monterey GRC is filed. DRA expects that the Monterey district rate cases can be consolidated with the remaining Cal Am districts once the Coastal Water Project or alternative project is completed.

schedule. Generally, DRA prefers to schedule the public participation hearings so that DRA has adequate time to investigate any customer concerns brought up during those hearings prior to finalizing the DRA report. In practice, very few of the utilities have bi-monthly billing, so having the PPHs early on should not pose a problem for most utilities. DRA understands that there are no single district Class A water utilities with bimonthly billing. Therefore DRA's proposed schedule for single district filers keeps the PPHs scheduled at five to seventy-five days after the utility's application is filed.

IV. ADDITION OF TECHNICAL CONFERENCE

To ensure that Water Division and other parties understand an applicant's ratemaking models, the Commission proposes to add a technical conference to the Rate Case Plan. DRA concurs with this recommendation under the assumption that Water Division will prepare the information needed by the ALJ Division and that Water Division will dedicate sufficient resources to run models for as many as 24 districts and assure that it is performed in a timely manner.⁸ Under the new proposed schedule, DRA would not have the staff to run the models. Should the Commission wish DRA's involvement in running the models, DRA would need to seek additional staff resources to do so.

V. COST OF CAPITAL PROCEEDING

In the Rulemaking, the Commission proposes that each utility scheduled to file a GRC application, file a cost of capital application by May 1 of the year prior to the Test Year ("TY"). It also allows other utilities to file an annual cost of capital application on May 1 of each year, at their option (Appendix A, p. 1). In addition, the Commission proposes that all Class A water utility cost of capital proceedings be consolidated.

⁸ DRA notes that in the Cal Water ratecase, as many as 20 RO tables per district will need updating, not counting the additional tables that will result from any new conservation rate designs the Commission may adopt.

DRA considered the merits of a consolidated cost of capital proceeding, but concluded that the drawbacks outweighed the advantages. DRA therefore recommends that cost of capital continue to be considered in the GRCs.

If the Commission implements a separate consolidated cost of capital proceeding, it will likely result in more frequent litigation of cost of capital. However, under the present Rate Case Plan, only four proceedings have litigated cost of capital: Cal Water 2005 GRC, Park Apple Valley 2005 GRC, Golden State Region III 2005 GRC, and Cal Am Los Angeles District 2006 GRC. All of the remaining Class A Water Utilities' GRC applications, or 73 percent, resulted in settled cost of capital. In addition, cost of capital is a factor in settling other issues in the GRCs, without which, the utilities may have much less incentive to settle major issues in the GRCs, resulting in additional evidentiary hearings, briefs, and issues for Commission decision.

There are many unanswered questions about how this process would work for Class A water utilities, as well. Most notably, the final rates in the GRCs cannot be established until a final cost of capital is approved. The timing of a consolidated cost of capital proceeding as proposed in the OIR would not be sufficient to render a decision on cost of capital in time for a timely resolution of the GRC. Parties generally acknowledged that the cost of capital application would need to be filed at least one year before the effective date of new rates. In addition, having a separate proceeding adds more work because utility-specific risk is considered in the GRCs.

The Commission's proposal that an annual cost of capital applications be "optional" for those utilities not filing their GRC in a given year is asymmetric in that it allows utilities to file for a review when interest rates increase, but does not require them to do so when interest rates decrease. In addition, if all the utilities decided to come in every year, it could adversely impact DRA's workload.

DRA recommends the Commission allow cost of capital to continue to be processed as part of the utility's GRC applications. DRA recommends that if the Commission decides to consolidate cost of capital in a single proceeding, that the Commission convene workshops to develop a comprehensive and workable process.

VI. MINIMUM DATA REQUIREMENTS

To reduce additional discovery during a formal rate case, the Commission included, as Attachments 1 and 2 to Appendix A of the Rulemaking, standardized Minimum Data Requirements (“MinDR”) that each utility must include in its GRC and cost of capital applications and supporting testimony. In their Scoping Memo, the Assigned Commissioner and ALJ asked parties to consider whether the Minimum Data Requirements should also require the applicant to demonstrate that it has complied with § 10620 of the California Water Code (preparation of Urban Water Management Plan).

DRA strongly recommends retaining complete documentation to substantiate the utility’s request for rate relief. As recently as July 2005, DRA revised its Master Data Request to include only the data DRA needs to perform its comprehensive review. During this OIR, DRA has compared the existing Master Data Request with the proposed Minimum Data Requirement and provides an edited version of the MinDR as Attachment 3, which includes the minimum data DRA needs for its analysis.⁹ In some cases, DRA eliminated data from its list. For example, DRA deleted the request for property details. In others, DRA proposes augmenting the Minimum Data Requirement. For example, DRA added requests for the data necessary to evaluate and validate rate design. Such data is especially important given Commission expectations for water utilities to develop conservation rate designs.

DRA urges the Commission to approve the additional data DRA proposes to include in the Minimum Data Requirements. If the Commission does not wish to add this additional data to the Minimum Data Requirements, DRA proposes that it issue a Supplemental Master Data Request that includes the data DRA needs for its analysis. DRA recommends that the data in the Supplemental Master Data Request be considered for deficiency review purposes to assure that DRA obtains all of the information needed in a timely manner so its review is not unnecessarily delayed.

⁹ DRA will provide a red-lined version of this document to parties on February 22, 2007 and will include it in its reply comments.

As mentioned above, the Scoping Memo asked parties to consider whether the Minimum Data Requirements should require the applicant to demonstrate that it has complied with § 10620 of the California Water Code (preparation of Urban Water Management Plan). DRA agrees that this requirement should be added to the Minimum Data Requirements. Subsection 10620 of the California Water Code requires the applicant to prepare an urban water management plan (“UWMP”). An urban water management plan describes and evaluates sources of supply, reasonable and practical efficient uses, and reclamation and demand management activities. Evidence of compliance could be a documented self-assessment of the plan¹⁰ using the review sheets that have been outlined by the Department of Water Resources (“DWR”), or, a letter from the DWR approving the UWMP. DWR reviews all such plans to determine whether they are in compliance with the code, or and are considered complete.

VII. WATER QUALITY REVIEW

See Joint Proposal provided in Attachment 1.

VIII. REDUCTION OF UNACCOUNTED WATER

See Joint Proposal provided in Attachment 1.

IX. INTERIM RATE RELIEF

In Appendix A of the Rulemaking, the Commission proposes to revise the current process by which utilities seek interim rates. Under the 2004 Rate Case Plan, the utility must file a motion seeking such relief. The Presiding Officer then prepares a decision for Commission consideration, which would address whether the delay in completing the GRC proceeding was due to the action of the water company. Where the water company had caused the delay, the Presiding Officer’s decision would propose a different effective date for interim or final rates.¹¹ The Rulemaking proposes to modify this process to allow

¹⁰ The Department of Water Resources provides UWMP Review Sheets at <http://www.owue.water.ca.gov/docs/ReviewSheets.xls>

¹¹ P.U. Code § 455.2 (b) states: If the commission's decision is not effective in accordance with subdivision (a), the applicant may file a tariff implementing interim rates that may be increased by an

the Assigned ALJ to determine whether the utility is entitled to interim rate relief through a ruling rather than requiring a Commission decision. DRA opposes this proposal.

As the Commission stated in the last rate case plan decision, Public Utilities Code Section 454¹² requires that all rate increases be “justified” and that any interim rate relief request demonstrate that the utility had made a substantial showing in its application supporting a rate increase at least equal to the rate of inflation. (D.04-06-018, p. 22.) If a party challenges a utility motion on the grounds that the utility has not made such a showing, Section 455.2 says “the Commission” may authorize a lesser increase, thus a Commission decision would be necessary. Similarly, challenges to a motion for interim rates on the grounds that the utility was the cause of the delay must also be decided by the Commission decision.

An ALJ cannot authorize an increase in rates on its own; the Commission must act to validate the ALJ’s action. A Commission decision is necessary to authorize any increase in a utility’s rates.

X. RATE CASE PLAN WAIVER PROCESS

In Appendix A of the Rulemaking, the Commission proposes to allow certain Class A water utilities the ability to file their general rate cases by Advice Letter rather than by application. The Commission states that a utility, at its option, can file its rate request by Advice Letter if 1) it tenders a proposed application, 2) the proposed application is not deficient, 3) the utility consists of a single ratemaking district, and 4) the requested change in revenue requirement is 5 percent or less.

amount equal to the rate of inflation as compared to existing rates. The interim rates shall be effective on the first day of the first test year in the general rate case application. These interim rates shall be subject to refund and shall be adjusted upward or downward back to the interim rate effective date, consistent with the final rates adopted by the commission. The commission may authorize a lesser increase in interim rates if the commission finds the rates to be in the public interest. If the presiding officer in the case determines that the commission's decision cannot become effective on the first day of the first test year due to actions by the water corporation, the presiding officer or commission may require a different effective date for the interim rates or final rates.

¹² Unless otherwise noted, all code references are to the Public Utilities Code.

DRA opposes this automatic application waiver process. While DRA agrees that if a utility meets the four requirements it may be suitable to process the utility's request by Advice Letter, there could be other events that warrant requiring the utility to file its request by Application. For example, a utility's rate increase request may meet the stated criteria yet the utility may have serious customer service problem or water quality issues that would warrant a comprehensive review through the application process.

DRA recommends that the Commission add a fifth criterion – that DRA agrees that the rate request can be processed through an Advice Letter. Adding this fifth criterion will help assure that the Commission does not process rate request applications that have serious issues, which warrant a more comprehensive review, through the Advice Letter process.

The Joint Proposal recommends two additional changes to the waiver process.
(See Attachment 1.)

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XI. CONCLUSION

DRA recommends that the Commission modify the rate case plan presented in Appendix A of R.06-12-015 to incorporate the changes discussed above and in the Attachments to this document, including those presented in the Joint Proposal included as Attachment 1. The changes are necessary to assure that DRA can process the Class A Water Utilities' general rate case applications in a timely and comprehensive manner.

Respectfully submitted,

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February 21, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **OPENING COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES** in **R.06-12-016** by using the following service:

E-Mail Service: sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

U.S. Mail Service: mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed on the 21st of February, 2007 at San Francisco, California.

Halina Marcinkowski

N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address and/or e-mail address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

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