

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 18, 2023

Ronald K. Moore
Senior Regulatory Analyst
Golden State Water Company
630 East Foothill Blvd.
San Dimas, CA 91773

Dear Mr. Moore,

The Water Division of the California Public Utilities Commission has approved Golden State Water Company's Advice Letter No. 1891-A, (Supplement to Advice Letter No. 1891), filed on January 17, 2023, regarding Acquisition Of A Contiguous Inadequately Operated And Maintained Small Water Utility.

Enclosed is a copy of the advice letter and Resolution W-5264 (Date Issued: 7/14/2023) with an effective date of July 13, 2023 for the utility's files.

Please contact Jeremy Ho at JRY@cpuc.ca.gov or 415-703-1905, if you have any questions.

Thank you.

Enclosures

DATE OF ISSUANCE: 07/14/2023

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

WATER DIVISION

RESOLUTION W-5264

July 13, 2023

RESOLUTION

**(RES. W-5264) GOLDEN STATE WATER COMPANY.
ORDER AUTHORIZING GOLDEN STATE WATER
COMPANY TO ACQUIRE CRESCENT BAY
IMPROVEMENT COMPANY**

**By Golden State Water Company's Advice Letter 1891-W;
submitted on December 20, 2022, and Advice Letter 1891-WA
submitted on January 17, 2023**

SUMMARY

By Advice Letter 1891-W submitted on December 20, 2022, as supplemented by Advice Letter 1891-WA (January 17, 2023), Golden State Water Company (Golden State), a Class A water utility, requests Commission authority to: 1) authorize Golden State's proposed acquisition of Crescent Bay Improvement Company (aka Crescent Bay Water System or Crescent Bay); 2) grant Golden State authority to consolidate Crescent Bay with the Clearlake Customer Service Area; 3) allow Crescent Bay customers to remain on their current flat rate until such time as meters can be installed on all services using state funding, then consolidate Crescent Bay customers into the Clearlake metered tariff no sooner than January 1, 2025; 4) find that Golden State's proposal complies with the rules and guidelines for the acquisition of an Inadequately Operated and Maintained Small Water Utility as set forth by the Commission in D.99-10-064 and Standard Practice U-14-W; 5) find that Golden State's acquisition of Crescent Bay is in the public interest and is consistent with the law; 6) find that Golden State is in compliance with all State and Federal drinking water standards; 7) to recognize/acknowledge the needed capital improvements to the Crescent Bay Improvement Company and authorize Golden State to rate base the average debt costs for Allowance For Funds Used During Construction (AFUDC) on capital investments for the period between when the costs are incurred and when the costs are reimbursed through grant funding; and 8) authorize Golden State to establish an Unanticipated Repair Cost Memorandum Account (URCMA) for Crescent Bay.

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This Resolution grants Commission authority for the following to Golden State: 1) to acquire Crescent Bay Improvement Company for \$1,000 under the terms and conditions set forth in the Asset Purchase Agreement executed on October 12, 2022; 2) to add Crescent Bay to the Clearlake tariff; 3) to allow Crescent Bay customers to remain on their current flat rates until the later of the given options: a year after Golden State completes meter installations, or January 1, 2025; 4) approves Golden State's request for rate base treatment of interest costs using the average debt cost associated with AFUDC for capital expenditures associated with the Crescent Bay system for the period between when the costs are incurred and when the costs are reimbursed through grant funding; and 5) approves Golden State's request to establish an URCMA with clarification that costs applied to the memorandum account are limited to expenses only and not construction expenditures.

This Resolution finds that Golden State's purchase of Crescent Bay is in the public interest if all capital expenditures for metering, rehabilitation, and interconnect of the Crescent Bay system is paid for through grant monies from the State Water Resources Control Board (SWRCB).

BACKGROUND

Crescent Bay Improvement Company (Crescent Bay) was founded in the 1930s and serves approximately 24 residential service connections. The current source of supply is surface water from Clear Lake. The treatment provided is characterized as diatomaceous earth filtration and provides for the necessary removal of Cryptosporidium, Giardia, and viruses. The application of free chlorine, however, combined with dissolved organic content in the water supports the formation of disinfection byproducts (DBP).

Crescent Bay has one redwood storage tank (10,000-gallon capacity), installed in the 1970s. This storage tank leaks; requires frequent patching; and has reached the end of its useful life. There are four polyethylene tanks (5,000-gallon capacity each) currently in operation, which were installed in Crescent Bay's water system in the 1990s. Two of these tanks are used as chlorine contact basins, and two of which act as clearwells. One chlorine contact tank and one clearwell require plastic welding, and both are in poor condition due to age. One contact tank is equipped with an aeration system intended to remove DBPs formed during chlorination. The chlorine contact tanks float together as

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they share an inlet and outlet pipe. These tanks can be valved-off and removed from operation independently to perform maintenance.

Crescent Bay has riparian rights allowing it to draw surface water from Clear Lake without paying usage fees. Two 1.5 hp/33 gallons per minute (gpm) manually cycled submersible pumps (Pumps C and D) draw water from the lake and direct it to the treatment plant. Pumps C and D are located approximately 15 and 50 ft. beyond the dock near the water treatment plant (WTP). Pump D is at an unknown depth, and Pump C is located 2 ft. from the lake bottom. Although water level switches installed in a 350-gallon tank at the WTP trigger both surface water pumps, only Pump D has been used recently as it has better raw water quality. Pump C is known to become clogged with algae during the summer months. The intake pumps' controls need to be upgraded to allow for automatic cycling. The water system does not have backup power capabilities, so the intake pumps shut down during power outages leaving customers without reliable water service. Water production between 2010-2015 and 2018-2019 varied seasonally from approximately 83,000 gallons per month in winter to 398,000 gallons per month in summer.

Pressure in Crescent Bay's system is maintained exclusively through elevation head in the system tanks. The target pressure is 20 pounds per square inch (psi) but elevations within the system make this pressure difficult to maintain. The tank site is at an elevation of approximately 1,525 feet, while customer services range from 1,350 feet to as high as 1,420 feet. Any future services located higher than the storage tank cannot maintain a pressure of 20 psi, which would require a water source level approximately 45 feet above any future connection, or the installation of a pumping system. The distribution system primarily consists of 3/4-inch to 2-inch Galvanized Iron (GI) water mains installed in 1935. Portions of the system are located outside of the public right of way, as well as routed across lawns and under structures. The system does not have maintenance easements. The fittings are of unknown age and material but are assumed to have been installed in 1935. Customer laterals are of unknown size and material and are unmetered.

The distribution system includes a single main which branches into four legs along Anderson Road. Each branch of the main is equipped with a manually operated control valve, which can be used to isolate a branch in case of a leak or emergency. Residences which utilize lake water pumped through private irrigation systems are equipped with

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backflow assemblies to prevent cross-contamination. Six (6) connections are equipped with backflow devices, which are tested regularly and are in good condition.

The system does not have fire hydrants, but one 2-inch standpipe is located along the distribution main, which is intended for fire protection. This is not considered appropriate or serviceable for fire protection or flushing, due to its small diameter and the relatively low system pressure. Crescent Bay has an existing emergency intertie with Baycliff Water Company to the east, but it has not been used, maintained, or exercised. This intertie is assumed to be inoperable.

Raw water from Clear Lake is treated at the 20-gpm WTP-site using a polymer and sodium hypochlorite injection, and a diatomaceous earth (DE) filtration process. Crescent Bay's water treatment system is manually operated requiring manual reset upon failure. As the system is old, most of the original treatment system controls are inoperable. The Crescent Bay's intake system pumps water through a filter, where it is injected with polymer, and stored in the raw water tank. Water is then pumped through the DE filtration system. Crescent Bay's treatment system is limited by this process. Constant water circulation and frequent replacement of the diatomaceous earth media is required to maintain the DE filters. This is a time-consuming process, particularly in summer months when organic material concentrations are high. Backwash water is stored in waste tanks then applied to a nearby spray field.

After DE filtration, water is stored in a 350-gallon tank and pumped through one 10 hp booster pump and one 5 hp high lift (pressure) pump, then sodium hypochlorite is injected. Turbidity and chlorine are measured downstream of the chlorine injection point. The aeration system in the two polyethylene tanks was installed to assist with the removal of volatile DBPs after formation but has not been effective in preventing DBP violations.

On April 28, 2017, Crescent Bay was issued domestic water supply permit #02-03-17P1700519 by the SWRCB, Division of Drinking Water (DDW) to operate its system.

On August 3, 2020, Crescent Bay was issued Citation No. 02_03_20C_021 by DDW for failure to comply with the maximum containment level for the DBP, total trihalomethanes, and haloacetic acids during the period of the fourth quarter of 2019 to the second quarter of 2020. To address this outstanding citation, Crescent Bay requires additional work to upgrade the system including replacement of infrastructure (mains, services, and meters), tanks, and treatment plant. The system's distribution, storage,

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and treatment infrastructure were built approximately 80, 40, and 20 years ago, respectively. The Crescent Bay system deficiencies include ineffective water treatment; aging, undersized and inaccessible distribution mains and appurtenances; manual and aging controls; insufficient storage capacity; degraded tank conditions; and an inaccessible tank site. The Crescent Bay system remains out of compliance due to its lack of financial ability to fund the necessary upgrades.

The majority of Crescent Bay's production and treatment facilities are located at the WTP site. Facilities at the site include backwash, raw, and treated water tanks and a treatment building. The treatment building houses a diatomaceous earth (DE) filter system, polymer and sodium hypochlorite injection systems, two booster pumps, and system controls. Crescent Bay's storage facilities are located at the tank site. Facilities at this site include five tanks and a bubble aeration system. The tank site is accessible only by foot via a 152-step staircase. Most of the system is manually operated, which increases the risk of operational failures during natural disasters. A more accessible storage site and alternate storage solution is needed.

On October 12, 2022, Golden State and Crescent Bay Improvement Company executed an Asset Purchase Agreement (Agreement) for Crescent Bay, a potable water distribution system located in Lake County, California.

Golden State submitted Advice Letter 1891-W on December 20, 2022, requesting to acquire Crescent Bay. Crescent Bay is considered an Inadequately Operated and Maintained Small Water System, as defined in the Settlement Agreement adopted by D.99-10-064, due to its lack of financial capacity necessary to upgrade Crescent Bay's system to comply with State and Federal drinking water standards. Golden State will purchase Crescent Bay for \$1,000 in accordance with the Agreement, and all assets will be transferred "as is", free and clear of all encumbrances, claims, and liens.

Golden State plans to consolidate Crescent Bay with its Clearlake district.

Improvements to the Crescent Bay system include but are not limited to replacement of distribution mains; replacement of control valves; installation of blowoffs; installation of fire hydrants; and installation of residential meters at each service connection. Golden State proposes two methods to bring Crescent Bay into compliance in response to DDW's Citation No. 02_03_20C_021, either: 1) building a new treatment plant using the existing Crescent Bay intake at Clear Lake; or 2) creating a tie-in with Golden State's Sonoma treatment plant in its Clearlake District to provide a connection to Crescent Bay via a pipeline along the shallow lake bottom.

NOTICE AND PROTESTS

In accordance with General Order 96-B, General Rules 4.3 and 7.2 and Water Industry Rule 4.1, Golden State served copies of Advice Letter 1891-W to the service list which included customers of Crescent Bay and the Clearlake customer service area. In accordance with Water Industry Rule 3.3, Golden State also posted Advice Letter 1891-W and its supplement on its website.

On January 9, 2023, Public Advocates Office submitted a protest to Advice Letter 1891-W on the grounds that (1) Golden State's request for recovery of funds used during construction should align with the company's short-term interest rate or average debt cost instead of the authorized rate of return in the AFUDC; and (2) clarifying that the URCMA should be used to track expenses only instead of any capital expenditures associated with unanticipated repairs.

Golden State responded on January 17, 2023, stating that they did not agree with Public Advocates Office's proposal to limit Golden State's carrying-cost calculation for its AFUDC to short term interest rates or average debt costs instead of calculating carrying costs based on Golden State's authorized rate of return; however, it is willing to accept this change for the purpose of expediting approval of Advice Letter 1891-W. The AFUDC will be added to rate base at the average debt carrying costs on capital investments for the period between when capital expenditures are incurred and when capital expenditures are reimbursed through grant funding.

In addition, Golden State agreed to clarify that the URCMA is limited to recovery of expenses and will not include capital expenditures. Golden State submitted a supplemental Advice Letter 1891-WA incorporating the changes proposed in Public Advocates protest.

On June 8, 2023, Public Advocates Office withdrew its protest stating that Golden State's supplemental Advice Letter 1891-WA successfully resolved the protested issues.

DISCUSSION

Golden State has served 2,100 customers in the Clearlake Customer Service Area for more than 35 years. As a Class A water utility serving over 260,000 customers statewide for more than 80 years, Golden State has the financial resources and technical experience in operating water systems to ensure the continuation of safe and reliable water service for Clearlake's and Crescent Bay's customers. In addition, the acquisition

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will grant Crescent Bay's customers access to Golden State's extensive customer service and online resources, along with Golden State's California Assistance Program.

Under the terms and conditions of the Agreement, Golden State agreed to acquire Crescent Bay for the purchase price of \$1,000. The impact on Golden State's rate base from the acquisition of Crescent Bay will be of a nominal amount. We find that the purchase price is reasonable and Golden State has the expertise to provide safe drinking water to Crescent Bay customers. While Golden State can provide safe and reliable drinking water to Crescent Bay, additional analyses are needed to address concerns in Golden State's requests in Advice Letter No. 1891-WA.

Crescent Bay Acquisition and Consolidation with Clearlake

Crescent Bay does not possess the financial capacity necessary to upgrade its water system to comply with State and Federal drinking water standards. Through Golden State's request to acquire and fully consolidate Crescent Bay to its Clearlake CSA, Crescent Bay will have the capacity to install meters for all connections by January 1, 2025, in order to meet the statutory deadline listed in Assembly Bill 2572 (Kehoe, 2004) and Assembly Bill 975 (2009, Fong). In addition, Golden State can provide much-needed upgrades to Crescent Bay's system by using their technical experience and financial capacity to maintain the system for many years to come. The State Water Resources Control Board provided the Technical Assistance Work Plan 6080-A study on May 2021 to evaluate the feasibility and improvements for Crescent Bay and other systems in the area. The study identified other baseline improvements including replacing service laterals; and installing a new distribution system, control valves, and fire hydrants. Golden State estimates the cost for this phase for system improvements to cost \$1.7 million and will be paid for through grant funding issued by SWRCB, Division of Financial Assistance (DFA).

Allowance for Funds Used During Construction

Golden State will use its own funding to begin making the necessary capital improvements for Crescent Bay until grant funding from DFA is received. Once grant funding is received, Golden State will stop using its own funds for capital improvements. The carrying costs of capital expenditures prior to grant funds being authorized by DFA will be applied to an AFUDC account at Golden State's average cost of debt for the period between when costs are incurred and when costs are reimbursed through grant funding. Once grant funding is received, Golden State should submit a Tier 2 advice letter to add the AFUDC balance to the Clearlake District's rate base.

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Transitional Rates for Crescent Bay

Golden State will continue charging Crescent Bay customers their existing flat rate of \$125.64 per month until January 1, 2025, and then transition them to Clearlake's metered rates once meters are installed. Since meters are not currently installed, there will be a time lag that will occur for the meter installation. As an amendment to Golden State's request, Crescent Bay customers will transition to Clearlake's metered rates only (1) Golden State completes the meter installations; and (2) after whichever date is later: either one year after Golden State completes the meter installations, or January 1, 2025. (In other words, if Golden State completes the installations on October 1, 2023, customers would switch to the metered rate on January 1, 2025. If the installations are complete on February 1, 2024, they would switch on February 1, 2025.) This will give customers adequate time to transition from their flat rates to metered rates.

Unanticipated Repair Cost Memorandum Account

Golden State proposes establishing an URCMA to track any costs associated with unanticipated repairs to Crescent Bay, as well as the possible construction of a new treatment facility or infrastructure needed to connect the current facility to Golden State's Sonoma treatment plant. Standard Practice U-14-W Section 8(g) allows utilities to establish an URCMA when acquiring an Inadequately Operated Maintained Small Water Utility and recovery of the URCMA must apply to only the inadequately operated utility. Golden State clarifies in their response to Cal PA's protest that costs applied to the URCMA are limited to recovery of expenses and will not include capital expenditures. Golden State's request to establish an URCMA is granted with the clarification explained above.

California Environmental Quality Act (CEQA) Review

Under Rule 2.4 of the Commission's Rules of Practice and Procedure, applications for authority to undertake any projects that are subject to CEQA shall comply with the review requirements set forth in CEQA, the regulations implementing CEQA, and Rule 2.4. A project triggering a CEQA review is an activity that may cause either a direct or a reasonably foreseeable indirect physical change in the environment.¹ In advice letter

¹ Public Resources Code Section 21065.

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1891-W, Golden State requests Commission approval of an Asset Purchase Agreement with Crescent Bay. The Commission has held that CEQA review is not required when a water utility submits an advice letter for approval of the purchase of the assets of another water utility.² Therefore, a CEQA review is not required in this Resolution. We recognize that the contractual agreements we approve in this Resolution may result in the future development of projects that are subject to CEQA review, and nothing in this Resolution is intended to alter our authority to review such projects.

Permit Requirement

Pursuant to the provisions of California Health and Safety Code Section 116525(a), the SWRCB requires any person or entity operating a public water system to obtain a domestic water supply permit to operate that water system. Golden State must therefore apply for and receive a permit from the SWRCB to operate Crescent Bay. Prior to obtaining a permit, Golden State must demonstrate to SWRCB that it possesses adequate technical, managerial, and financial (TMF) capability to assure the delivery of pure, wholesome, and potable drinking water. Golden State will send a copy of the completed TMF Assessment Form along with all necessary attachments to the Commission. Accordingly, the transfer of operations of Crescent Bay to Golden State should therefore be conditioned on Golden State obtaining the required permit to operate Crescent Bay.

Conclusion

Water Division finds that Golden State's acquisition of Crescent Bay for \$1,000 is reasonable. Golden State has the technical, managerial, and financial expertise to bring the system into compliance with SWRCB's water quality standards. The acquisition is in the public's interest based on Golden State's acquisition of Crescent Bay for \$1,000. Golden State's request to record AFUDC and establish the URCMA as discussed in this resolution are granted.

² D.21-08-002 at p38 and D.22-10-003 at p25

AFFORDABILITY OF RATES

The median household income (MHI) for Lower Lake, the location where Crescent Bay resides is \$34,384³ and Clearlake's MHI is \$37,783.⁴ SWRCB considers an area with an MHI of less than 60% of the Statewide MHI, or \$47,203, as a severely disadvantaged community,⁵ and therefore both Clearlake and Crescent Bay qualify as severely disadvantaged communities. The average monthly bill for a Crescent Bay residential customer is \$125.64 per month, which is approximately 4.4% of MHI. The average monthly bill for Clearlake residential customers in 2023 using 5 CCF of water is projected at over \$105.00 per month in the current general rate case, A.20-07-012, which is approximately 3.4% of MHI.

Using metrics from Rulemaking (R.)18-07-006, the Crescent Bay location yields an Affordability Ratio at the 20th percentile (AR20) of 12%. This means that customers whose income is at the 20th percentile in this area spend roughly 12% of their income for water utility bills on an annual basis. The 2020 Annual Affordability Report classifies any water utility service area with an AR20 greater than 10% as an Area of Affordability Concern and should be a priority within the Commission.⁶ Clearlake's location yields an AR20 of 11.2% and is therefore considered an Area of Affordability Concern.

The Clearlake Customer Service Area has the highest average monthly residential bill for the lowest average water usage of all Golden State rate areas in the state.

ENVIRONMENTAL AND SOCIAL JUSTICE

In February 2019, the Commission adopted an Environmental and Social Justice Action Plan (ESJ Action Plan) to serve as a roadmap to expand public inclusion in Commission decision-making processes to targeted communities across California. The ESJ Action Plan establishes a series of goals related to health and safety, consumer protection, program benefits, and enforcement in all the sectors the Commission regulates. On April 7, 2022, the Commission adopted Version 2.0 of the ESJ Action Plan to guide its

³ <https://www.california-demographics.com/lower-lake-demographics>

⁴ Census Bureau 2021 Clearlake Data

⁵ https://www.waterboards.ca.gov/drinking_water/services/funding/documents/srf/mhi.pdf

⁶ 2020 Annual Affordability Report, page 13

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decisions and make sure its broad regulatory authority continues to advance equity throughout the state. With this Resolution, the Commission addresses three goals of the ESJ Action Plan: Goal #1 “Consistently integrate equity and access considerations throughout Commission regulatory activities;” Goal #3: “Strive to improve access to high-quality water, communications, and transportation services for ESJ communities;” and Goal #5: “Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC’s decision-making process and benefit from CPUC programs.”

We have considered equity and access considerations through our review of the proposed transaction in this Resolution and note that Crescent Bay and Golden State’s Clearlake District are classified as severely disadvantaged communities as defined by the SWRCB and are Areas of Affordability Concern.

Our review of the proposed sale considering the ESJ goals indicates the proposed acquisition of Crescent Bay by Golden State would improve the existing water service by bringing the system into compliance with SWRCB water quality standards. Golden State also has the technical, managerial, and financial expertise as it served water to California customers for over 90 years. Lastly, through the acquisition, Crescent Bay customers may be eligible for rate assistance programs that are currently not readily available through their current water service.

COMPLIANCE

Golden State has no outstanding compliance orders, and the utility has been filing annual reports as required. Golden State is also in compliance with the SWRCB’s water quality standards for safe drinking water. Crescent Bay is still subject to an outstanding compliance order as previously discussed in the Resolution, and the acquisition of Crescent Bay by Golden State provides for a pathway to address this outstanding compliance order.

P.U. Code Section 433(a) requires public utilities to pay an annual public utilities reimbursement fee (annual fee) to the Commission. The Water Division confirmed with the Commission’s fiscal office that Golden State is current with its annual fee payments.

COMMENTS

This is an uncontested matter that pertains solely to a transfer of a water corporation in which the resolution grants the relief requested.

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Accordingly, pursuant to PU Code § 311(g)(3), the 30-day period for public review and comment is waived.

FINDINGS AND CONCLUSIONS

1. By Advice Letter 1891-W, submitted on December 20, 2022, and supplemented by Advice Letter 1891-WA on January 17, 2022, Golden State Water Company, a Class A water utility, requested authorization to acquire Crescent Bay for \$1,000 under the terms and conditions set forth in the Asset Purchase Agreement dated October 12, 2022.
2. The Public Advocates Office submitted a protest to Advice Letter 1891-W on January 9, 2023.
3. Golden State replied to Public Advocates Office's protest on January 17, 2022, and agreed to incorporate changes into its supplemental Advice Letter Filing 1891-WA.
4. Crescent Bay is a publicly operated water system that serves 24 connections and is considered an Inadequately Operated and Maintained Small Water System as defined by Decision 99-10-064 and SP-14-W.
5. On August 20, 2020, Crescent Bay was issued a citation from the State Water Resources Control Board (SWRCB), Division of Drinking Water for failing to comply with the maximum contaminant level for disinfection byproducts HAA5 and has continued to be out of compliance.
6. Crescent Bay is a Severely Disadvantaged Community as defined by the SWRCB.
7. Golden State's Clearlake District is a Severely Disadvantaged Community as defined by the SWRCB.
8. Crescent Bay is an Area of Affordability Concern as defined by the Affordability Ratio at the 20th income percentile (AR20) in the 2020 Annual Affordability Report.

9. Golden State's Clearlake District is an Area of Affordability Concern as defined by AR20 in the 2020 Annual Affordability Report.
10. Golden State's request for the acquisition of Crescent Bay via an advice letter is consistent with the process set forth by Decision 99-10-064 and General Order 96-B.
11. Golden State requests to allow Crescent Bay customers to remain on their current flat rate tariff until installations of meters, no sooner than January 1, 2025, and then consolidate Crescent Bay customers into the Clearlake metered tariff.
12. This resolution finds that Golden State's acquisition of Crescent Bay is in the public interest by providing safe and affordable drinking water for Crescent Bay residents.
13. Crescent Bay customers will benefit from Golden State's technical, managerial, and financial resources as well as low-income programs.
14. Golden State's planned improvements will bring the system into compliance with SWRCB and provide safety features by installing fire protection measures.
15. Golden State complies with all State and Federal drinking water standards.
16. Golden State will apply for grant funding through the SWRCB's Division of Financial Assistance to fully fund Crescent Bay's system improvements.
17. Capital investments to Crescent Bay are needed to bring the system into compliance.
18. It is reasonable to amend Golden State's request to allow for Crescent Bay customers to remain on their current flat rates until (1) Golden State completes meter installations; and (2) after whichever date is later: one year after Golden State completes meter installations, or January 1, 2025.

19. Golden State's request to rate base the average debt costs for Allowance for Funds Used During Construction on capital investments for the period between when investments are made and when the costs of those investments are reimbursed through grant funding should be approved.
20. Golden State's request to establish the Unanticipated Repair Cost Memorandum Account should be approved on the condition that costs applied to the memorandum account track expenses only and not construction expenditures.

THEREFORE, IT IS ORDERED THAT:

1. Pursuant to Public Utilities Code Sections 851-854 and Resolution ALJ-272, this Resolution authorizes Golden State Water Company to acquire the Crescent Bay Improvement Company for \$1,000, under the terms and conditions set forth in the Asset Purchase Agreement signed on October 12, 2022, conditioned on Golden State Water Company obtaining the required permit to operate the Crescent Bay Improvement Company water system from the State Water Resources Control Board.
2. Golden State Water Company's request to add the Crescent Bay Improvement Company to its Clearlake service tariff is granted.
3. Golden State Water Company's request to allow Crescent Bay Improvement Company's customers to stay on their current flat rate tariff until January 1, 2025, is amended to allow customers to stay on their current flat rate tariff for the later of the following options after all meters are installed: a year after meter installation or January 1, 2025.
4. Golden State Water Company is authorized to include Allowance for Funds Used During Construction at the average cost of debt associated with the time between when investments are made to provide safe drinking water for the Crescent Bay Improvement Company and when the costs of those investments are reimbursed through grant funding from the State Water Resources Control Board.

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5. Golden State Water Company's requests to establish an Unanticipated Repair Cost Memorandum Account is granted on the condition that the memorandum account tracks costs associated with expenses only and not construction expenditures.

This resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on July 13, 2023; the following Commissioners voting favorably thereon:

/s/ RACHEL PETERSON

RACHEL PETERSON

Executive Director

ALICE BUSCHING REYNOLDS

President

GENEVIEVE SHIROMA

DARCIE L. HOUCK

JOHN REYNOLDS

KAREN DOUGLAS

Commissioners

GOLDEN STATE WATER COMPANY SERVICE LIST

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**CALIFORNIA PUBLIC UTILITIES COMMISSION
WATER DIVISION**

Advice Letter Cover Sheet

Utility Name: Golden State Water Company

Date Mailed to Service List: 1/17/2023

Clearlake District
(Crescent Bay Water System

District: Acquisition)

CPUC Utility #: 133 W

Protest Deadline (20th Day): TBD

Advice Letter #: 1891-WA

Review Deadline (30th Day): TBD

Tier 1 2 3 Compliance

Requested Effective Date: TBD

D.99-10-064 and General Order
No. 96-B, Water Industry Rules,

Authorization Section 7.3.3

Rate Impact: N/A

Description: Acquisition Of A Contiguous Inadequately
Operated And Maintained Small Water Utility

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

Utility Contact: Nguyen Quan

Phone: (909) 394-3600 x 682

Phone: (909) 394-3600 x 664

Email: rkmoore@gswater.com

Email: nquan@gswater.com

WD 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: _____



January 17, 2023

Advice Letter No. 1891-WA

(U 133 W)

California Public Utilities Commission

Golden State Water Company (“Golden State”) hereby submits this advice letter filing applicable to its Clearlake Customer Service Area (“CSA”):

Subject: Acquisition of a Contiguous Inadequately Operated and Maintained Small Water Utility

SUPPLEMENT

GSWC is filing this supplement to its Advice Letter No. 1891-W to address the comments the Public Advocates Office (Cal Advocates) made in their protest, which was filed on January 9, 2023. Given the unique circumstances associated with this acquisition, GSWC is incorporating Cal Advocates’ recommendations accordingly. This supplemental filing will replace Advice Letter No. 1891-W in its entirety.

PURPOSE

The purpose of this advice letter is to obtain approval from the California Public Utilities Commission (“Commission”) to do the following:

- (1) Authorize Golden State’s proposed acquisition of Crescent Bay;
- (2) Grant Golden State authority to consolidate Crescent Bay with the Clearlake Customer Service Area;
- (3) Allow Crescent Bay customers to remain on their current flat rate until such time as meters can be installed on all services using state funding, then merge them on the Clearlake metered tariff. The merge will occur no sooner than January 1, 2025;
- (4) Find that Golden State’s proposal complies with the rules and guidelines for the acquisition of IOMSWUs, set forth by the Commission in D.99-10-064 and Standard Practice U-14-W;
- (5) Find that Golden State’s acquisition of Crescent Bay is in the public interest and is consistent with the law;
- (6) Find that Golden State is in compliance with all State and Federal drinking water standards;
- (7) To recognize/acknowledge the needed capital improvements to the Crescent Bay Water System and authorize Golden State to rate base the average debt costs on

- capital investments for the period between when the costs are incurred and when the costs are reimbursed through grant funding; and
- (8) Authorize Golden State to establish an Unanticipated Repair Cost Memorandum Account (“URCMA”) for Crescent Bay.

The aforementioned request is made pursuant to Commission directives in D.99-10-064, which states: “To expedite improvements mandated by the Department of Health Services, the transfers of assets and related obligations of an inadequately operated and maintained small water utility may be approved by the Commission pursuant to an advice letter.”^{1 2}

ADVICE LETTER PROCESS

The Commission’s Standard Practice U-14-W indicates that the advice letter process is the appropriate procedural vehicle for a water utility to acquire an IOMSWU and sets forth additional procedural requirements and standards for the review, processing and disposition of such advice letter filings.³ Finally, Water Industry Rule 7.3.3(10) of General Order 96-B specifically contemplates the use of a Tier 3 advice letter for: “Transfer of ownership of inadequately operated and maintained Class C or Class D water Utility (see D.99-10-064).”⁴ Golden State files this advice letter pursuant to these Commission rules and procedures, and in conformance with the general procedures and standards governing advice letter filings set forth in the Commission’s General Order No. 96-B.

BACKGROUND

On October 12, 2022, Golden State and Crescent Bay Improvement Company executed a Purchase and Sale Agreement (“Purchase and Sale Agreement”) of Crescent Bay, a potable water distribution system serving approximately 24 customers in the unincorporated community of Lower Lake, located in Lake County, California. The Crescent Bay Water System is currently being operated pursuant to a domestic water supply permit issued in April 2017 by the State Water Resources Control Board Division of Drinking Water (“DDW”). The permit granted Crescent Bay permission to operate a water system located within the community of Lower Lake (Public Water System No.CA1700159).

Crescent Bay does not possess the financial capacity necessary to upgrade its water system to comply with State and Federal drinking water standards.

¹ *Id.* at Appendix D, Section 3.02.

² Department of Health Services is now called State Water Resources Control Board Division of Drinking Water

³ *See id.* at §§ E-G.

⁴ GO 96-B at § 7.3.3(10).

On August 3, 2020, DDW issued citation no. 02_03_20C_21 for the failure to comply with the maximum contaminant level for the disinfection byproducts, total trihalomethanes and haloacetic acids, during the fourth quarter of 2019, first quarter of 2020 and second quarter of 2020. The system has remained out of compliance.

In Senate Bill 1268, the Public Water System Investment and Consolidation Act of 1997, codified as Public Utilities Code Sections 2718, *et seq.*, the California Legislature recognized the need to upgrade public water system infrastructure. Specifically, Public Utilities Code Section 2719 states:

- (a) Public water systems are faced with the need to replace or upgrade the public water system infrastructure to meet increasingly stringent state and federal safe drinking water laws and regulations governing fire flow standards for public fire protection.
- (b) Increasing amounts of capital are required to finance the necessary investment in public water system infrastructure.
- (c) Scale economies are achievable in the operation of public water systems.
- (d) Providing water corporations with an incentive to achieve these scale economies will provide benefits to ratepayers.⁵

The Commission thereafter issued (i) D.99-10-064, which sets forth the general requirements regarding acquisitions and mergers of public utility water systems and provides incentives for acquisition of IOMSWUs, and (ii) Commission Standard Practice U-14-W, which provides the rules and guidelines for seeking approval of the acquisition of an IOMSWU through the advice letter process.

As discussed below, Golden State's proposals (i) to acquire Crescent Bay, (ii) consolidate Crescent Bay with Golden State's Clearlake Customer Service Area, (iii) to make capital improvements to Crescent Bay that will be paid for with principal forgiveness loan proceeds to be secured by Golden State, and (iv) to establish an URCMA for unanticipated repair expenses associated with the Crescent Bay Water System (including costs associated therewith) resulting from approval of Golden State's proposed actions in this filing that are not otherwise provided for in a general rate case application or decision are consistent with the incentives set forth in D.99-10-064 and

⁵ Pub. Util. Code § 2719 (West 2015)

the Commission's Standard Practices U-14-W⁶ and in the public interest, therefore, the Commission should authorize each of the foregoing requests.

TECHNICAL, MANAGERIAL AND FINANCIAL ("TMF")

Prior to obtaining a water supply permit for a change of ownership, Golden State must demonstrate to DDW that they possess adequate technical, managerial and financial ("TMF") capability to assure the delivery of pure, wholesome, and potable drinking water. A completed TMF Assessment form along with all necessary attachments will be submitted to DDW and the Commission by Golden State.

DISCUSSION

The current source of supply for the Crescent Bay water system is surface water from Clear Lake. The treatment provided is classified as diatomaceous earth filtration, and provides the necessary removal credits for *Cryptosporidium*, *Giardia* and viruses. The application of free chlorine, however, combined with dissolved organic content in the water supports the formation of disinfection byproducts. The system monitors for DBPs quarterly and has exceeded the MCLs for HAA5s consistently for several years.

Optimizing the existing treatment system may produce water that meets all regulatory standards, including for DBPs, for an interim period. However, the existing treatment is not designed to treat the poor raw water quality of Clear Lake. In addition, the location of the existing plant at the shore of the lake makes for operations and maintenance difficulties, particularly with access to supplies and discharge of waste.

Golden State intends to optimize treatment further where possible and then evaluate and seek state funding for an alternate source of supply. Two of the options under consideration are (1) a new treatment plant using the existing Crescent Bay intake of Clear Lake, and (2) using source water treated at Golden State's Sonoma treatment plant and conveying it to Crescent Bay via a pipeline along the bottom of the shallow lake.

Additionally, Golden State will seek state funding to replace the undersized water mains and relocate them to the public right-of-way, and install water meters on each water service.

The capital improvements that Golden State plans to implement are described in Exhibit X-3.

In D. 99-10-064, the Commission adopted guidelines for the acquisition and merger of certain water utilities. In particular, citing the Public Water System Investment and Consolidation Act, Pub. Util. Code sections 2718, et seq., among other things, the

⁶ The incentive providing for the establishment of an URCMA for expenses associated with unanticipated repairs to an IOMSWU is provided in Appendix D to D.99-10-064 at Section 3.03(A), and Commission Standard Practice U-14-W (July 2007) at Section F.8.5.

Commission acknowledged that it is the policy of the State of California to provide incentives to the investor-owned utilities to acquire small publicly owned water systems and inadequately operated and maintained small water utilities (i.e., those serving less than 2,000 customers and subject to a DDW compliance order). This policy is designed to yield economies of scale to facilitate the upgrade of water system infrastructure to meet increasingly stringent water quality requirements, among other things.

In furtherance of this State policy and as part of the Commission's regulatory program to encourage investor-owned water utilities to acquire small publicly owned water systems and inadequately operated and maintained small water utilities, Golden State requests that the Commission make a finding that, so long as Golden State is in compliance with a DDW-approved Compliance Plan, Golden State shall be deemed to be in compliance with all State and Federal drinking water standards.

ACQUISITION OF CRESCENT BAY

Golden State's planned acquisition of Crescent Bay, which is expected to occur immediately following approval by the Commission is in the public interest. Crescent Bay is an IOMSWU, as defined in the Settlement adopted by D.99-10-064⁷, because Crescent Bay Improvement Company lacks the financial capacity necessary to upgrade Crescent Bay to be in compliance with State and Federal drinking water standards. The small number of customers of Crescent Bay makes the burden of complying with DDW standards extremely difficult. Therefore, Crescent Bay lacks sufficient financial resources to provide safe drinking water to its Crescent Bay customers. By consolidating Crescent Bay with the Clearlake CSA, for both operational and ratemaking purposes, it achieves economies of scale to improve and maintain Crescent Bay water system infrastructure.

In-lieu of an appraisal, Golden State is applying the provisions of Public Utilities Code 2720(a), which states the Commission "shall use the standard of fair market value when establishing the rate base for the distribution system of a public water system acquired by a water utility. This standard shall be used for ratesetting." PU Code 2720(a)(2) defines "fair market value" as having the meaning set forth in Code of Civil Procedures 1263.320, subsection (a) of which states that fair market value is "the highest price ...that would be agreed to by a seller, being willing to sell but under no particular or urgent necessity for doing, nor obligated to sell, and a buyer, being ready, willing and able to buy but under no particular necessity for doing so..."

Golden State understands that Crescent Bay assets will be transferred "as is", free and clear of all encumbrances, claims and liens. The purchase price for the assets is

⁷ See *supra*, note 1.

\$1,000.00 which is to be included in rate base. Given the de minimis purchase price, Golden State is not requesting a premium over existing Crescent Bay's rate base.

As set forth in Exhibit X-3, Golden State has a plan to provide the infrastructure improvements necessary to bring Crescent Bay into compliance with state and federal drinking water standards, and Golden State's proposed acquisition of Crescent Bay complies with the rules and guidelines for the acquisition of IOMSWUs, set forth by the Commission in D.99-10-064 and Standard Practice U-14-W. For all of the foregoing reasons, the Commission should find Golden State's acquisition of Crescent Bay in the public interest and authorize the acquisition.

CAPITAL IMPROVEMENTS

As set forth in Exhibit X-3 Golden State plans to make capital improvements to Crescent Bay in order to bring the system into compliance with State and Federal drinking water standards using principal forgiveness loan funding.

Golden State will apply for principal-forgiveness funding under the DDW's Drinking Water SRF program for the capital improvements described in Exhibit X-3. The system meets the criteria (small, disadvantaged community out of compliance with a primary drinking water standard) to be considered eligible and a high priority for funding.

Golden State requests permission to rate base the average debt costs incurred on capital investments for the period between when the costs are incurred and when the costs are reimbursed through grant funding.

CONSOLIDATION WITH CLEARLAKE CUSTOMER SERVICE AREA

The Clearlake CSA is the closest Golden State operating water system to Crescent Bay. The Clearlake CSA is contiguous to Crescent Bay (only separated by a lake (Clear Lake). Golden State's existing staff at the Clearlake CSA can be shared to service the Crescent Bay Water System. As stated above, a completed TMF Assessment form along with all necessary attachments will be submitted to SWRCB and the Commission.

After the acquisition is granted, Golden State is proposing to keep the Crescent Bay customers on their existing flat rate tariff until all the customers are metered, which will occur no sooner than January 1, 2025, after which, all Crescent Bay customers would be subject to the tariff schedules applicable to Golden State's Clearlake customers and would be part of the Clearlake CSA for both operational and ratemaking purposes. This request complies with provision 4.02, Filing of Rates, of Appendix D in D.99-10-064⁸ for the acquisition of Mutual and Publicly-Owned Water Systems. Crescent Bay's current tariff sheet and Golden State's Schedule CL-1 - General Metered Service tariff schedule are in Exhibit X-4. Golden State will be filing a General Rate Case Application in July 2023 to establish rates for 2025 through 2027. The cost of service and capital

⁸ This provision of rates to be charged to an IOMSWU is provided in Appendix D to D.99-10-064 at Section 4.02.

requests related to Crescent Bay, beginning in 2025, will be reflected in that General Rate Case Application.

CUSTOMER ASSISTANCE PROGRAM (“CAP”)

Golden State will offer the CAP program to the Crescent Bay customers, effective upon the acquisition’s approval. The key components of the CAP program are 1.) eligibility for the program is based on certain household income and household sizes, 2.) the monthly discount is a fixed amount equal to approximately 20% of the average bill for a residential customer in the Clearlake Customer Service Area, and 3.) the costs of the program are recovered through a surcharge applied to all ineligible customers. Crescent Bay will be consolidated into Golden State’s Clearlake Customer Service Area and its low-income customers will be eligible to enroll for the CAP discount.

UNANTICIPATED REPAIR COST MEMO ACCOUNT (“URCMA”)

Golden State proposes establishing an URCMA to track expenses associated with unanticipated repairs to Crescent Bay for later recovery in rates, subject to its prudent administration of such repairs. Because the incentives set forth in D.99-10-064 and incorporated into Commission Standard Practice U-14-W also permit a utility acquiring an IOMSWU to establish an URCMA,⁹ Golden State’s request is consistent with the Commission’s policy. The URCMA shall track expenses that are unanticipated, crucial to the operation of the utility, and costs not already included in rates.

COMPLIANCE WITH THE REQUIREMENTS OF D.99-10-064 AND COMMISSION STANDARD PRACTICE U-14-W

This advice letter and its exhibits include all of the information required by D.99-10-064 and Commission Standard Practices U-14-W:

- (1) A copy of the executed Purchase and Sale Agreement for Golden State’s acquisition of Crescent Bay is attached as Exhibit X-1.
- (2) A copy of the draft notice to be provided to all affected customers in Crescent Bay (i) comparing their current rates with the current rates in Clearlake and (ii) advising of Golden State’s filing of this advice letter, is attached as Exhibit X-2. This notice will also be provided to existing Clearlake customers and will be posted on Golden State’s website;
- (3) In lieu of an appraisal of Crescent Bay, Golden State is providing cost estimate for the proposed treatment facilities, which is attached as Exhibit X-3. More discussion on the principal forgiveness loan Golden State is seeking to drill the new well and installation of the treatment facilities is discussed in Exhibit X-3;
- (4) Crescent Bay’s Water tariff sheet and Golden State’s Schedule CL-1 – General Metered Service tariff schedule are in Exhibit X-4. Golden State will rename the existing Crescent Bay Water tariff to make it an official Clearlake tariff

⁹ *Id.* at Section 3.03(A); Standard Practice U-14-W at F.8.g.

- until all the Crescent Bay customers are metered and merged onto Clearlake's metered rate schedule, which will occur no sooner than January 1, 2025;
- (5) A detailed description of Crescent Bay, including a list of facilities including wells, storage and structures, and a distribution system map showing pipe sizes, fire flow and pressure areas is attached as Exhibit X-5;
 - (6) The names and addresses of all utilities, corporations, persons or other entities, either public or private, with which Crescent Bay is likely to compete, and all cities and counties within which service will be rendered, are included in the service list attached as Exhibit X-6; no entities are likely to compete with Crescent Bay, and Crescent Bay will only provide service in the unincorporated community of Crescent Bay.
 - (7) A list providing the status of the franchises and health and safety permits obtained or required to operate Crescent Bay, including the status of the Technical, Managerial and Financial Capacity certification required from the DDW is attached as Exhibit X-8;
 - (8) An accounting of the original cost (or estimated original cost) of all plant and depreciation reserve is attached as Exhibit X-9;
 - (9) A service area map delineating the new service area is attached as Exhibit X-10; and
 - (10) The proposed Preliminary Statement for the Crescent Bay Unanticipated Repair Cost Memorandum Account is attached as Exhibit X-7.

GENERAL REGULATORY COMPLIANCE

This filing will not interfere with the operation of Golden State's other public utility operations or the water system of another public agency.

Golden State respectfully submits this advice letter in compliance with Commission Standard Practice U-14-W, Standard Practice For Preparing and Processing Advice Letters For Service Area Extensions, and Determining That A Mutual Does Not Infringe On The Service Area Of A Regulated Water Company. Golden State respectfully requests that the Commission issues a resolution that approves the acquisition of Crescent Bay pursuant to the Purchase and Sale Agreement and, in accordance with D.99-10-064, find the rates applicable to customers in Crescent Bay just and reasonable.¹⁰

REQUEST

As demonstrated and supported in this advice letter filing, Golden State requests that the Commission finds that Golden State has acted in good faith and grants the following:

- (1) Authorize Golden State's proposed acquisition of Crescent Bay;

¹⁰ See D.99-10-064 at p. 11, Conclusion of Law #5.

- (2) Grant Golden State authority to consolidate Crescent Bay with the Clearlake Customer Service Area;
- (3) Allow Crescent Bay customers to remain on their current flat rate until such time as meters can be installed on all services using state funding, then merge them on the Clearlake metered tariff. The merge will occur no sooner than January 1, 2025;
- (4) Find that Golden State's proposal complies with the rules and guidelines for the acquisition of IOMSWUs, set forth by the Commission in D.99-10-064 and Standard Practice U-14-W;
- (5) Find that Golden State's acquisition of Crescent Bay is in the public interest and is consistent with the law;
- (6) Find that Golden State is in compliance with all State and Federal drinking water standards;
- (7) To recognize/acknowledge the needed capital improvements to the Crescent Bay Water System and authorize Golden State to rate base the average debt costs incurred on capital investments for the period between when the costs are incurred and when the costs are reimbursed through grant funding; and
- (8) Authorize Golden State to establish an Unanticipated Repair Cost Memorandum Account ("URCMA") for Crescent Bay.

NOTICE

The notice (i) comparing the rates before and after the acquisition of Crescent Bay, and (ii) advising of Golden State's filing of this advice letter, attached as Exhibit X-2, is being provided to all affected customers by first-class U.S. mail service.

In compliance with General Rules 4.2 and 7.2 and Water Industry Rule 4.1 of General Order 96-B, this advice letter is being served on all interested and affected parties. Golden State will also post this advice letter to its website.

TIER DESIGNATION

Pursuant to Water Industry Rule 7.3.3(10) of General Order 96-B, this advice letter is submitted with a Tier 3 designation.

EFFECTIVE DATE

Golden State is requesting that this filing become effective upon regular statutory notice.

PROTEST AND RESPONSES

Anyone may submit a response or protest for this Advice Letter ("AL"). 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 grounds¹¹ 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
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 are:

Email Address:

Water.Division@cpuc.ca.gov

Mailing Address:

CA Public Utilities Commission
Water Division
505 Van Ness Avenue
San Francisco, CA 94102

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 at:

Email Address:

regulatoryaffairs@gswater.com

Mailing Address:

Golden State Water Company
Attn: Ronald Moore
630 East Foothill Blvd.
San Dimas, CA 91773

¹¹ G.O. 96-B, General Rule 7.4.2

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform WD, 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.

REPLIES¹²

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.

Sincerely,
/s/ Ronald Moore

Ronald Moore
Regulatory Affairs Department
Golden State Water Company

c: Jim Boothe, CPUC - Water Division
Bruce DeBerry, CPUC- Water Division
Jeremy Ho, CPUC- Water Division
Victor Chan, CPUC- PAO
Richard Rauschmeier, CPUC- PAO

¹² G.O. 96-B, General Rule 7.4.3

GOLDEN STATE WATER COMPANY

SERVICE LIST

CLEARLAKE DISTRICT

Highlands Water Company
14580 Lakeshore Drive
Clearlake, CA 95422

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

City Clerk
City of Clearlake
14050 Olympic Drive
Clearlake, CA 95422
mswanson@clearlake.ca.us

City Attorney
City of Clearlake
14050 Olympic Drive
Clearlake, CA 95422

Local Agency Formation Commission
P. O. Box 2694
Granite Bay, CA 95746
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