

**CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS**

Advice Letter Cover Sheet

Utility Name: California American Water
District: All Districts
CPUC Utility #: U210W
Advice Letter #: 1220
Tier: 1 2 3 Compliance
Authorization: D.18-09-017
Description: MPWSP Modification of the Comprehensive Settlement and Memo Accounts

Date Mailed to Service List: December 31, 2018
Protest Deadline (20th Day): January 22, 2019
Review Deadline (30th Day): January 31, 2019
Requested Effective Date: December 31, 2018
Rate Impact: \$See AL
See AL%

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.

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DWA USE ONLY

| <u>DATE</u> | <u>STAFF</u> | <u>COMMENTS</u> |
|-------------|--------------|-----------------|
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |

APPROVED

WITHDRAWN

REJECTED

Signature: _____

Comments: _____

Date: _____



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December 31, 2018

ADVICE LETTER NO. 1220

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

California-American Water Company (Cal-Am) (U210W) submits this advice letter, including the following tariff sheets applicable to all Monterey Main including Bishop, Hidden Hills and Ryan Ranch water customers.

| <u>C.P.U.C. Sheet No.</u> | <u>Title of Sheet</u> | <u>Canceling Sheet No.</u> |
|-------------------------------|---|--------------------------------|
| XXXX-W | PRELIMINARY STATEMENT SUMMARY TABLE (continued) | 8755-W |
| XXXX-W | PRELIMINARY STATEMENT (continued) | NEW |
| XXXX-W | PRELIMINARY STATEMENT (continued) | NEW |
| XXXX-W | PRELIMINARY STATEMENT (continued) | NEW |
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Purpose:

In compliance with Decision (D.) 18-09-017, Cal-Am requests authorization from the California Public Utilities Commission (“Commission”) to:

- adjust the financing and ratemaking framework set out in the proposed Comprehensive Settlement Agreement (“Comprehensive Settlement”);
- implement the proposed modified financing and ratemaking framework;
- establish the Monterey Peninsula Water Supply Project (“MPWSP”) Phase 1 Project Cost Memorandum Account;
- establish the MPWSP Construction Fund Charge Memorandum Account; and
- establish the MPWSP Operations and Maintenance Memorandum Account.

Background & Discussion:

In Application (A.) 12-04-019, Cal-Am sought Commission authorization to construct and operate the MPWSP and to recover all present and future costs for the MPWSP in rates. In D.18-07-019,

the Commission found that “[c]onstruction and operation of the MPWSP will allow Cal-Am to meet reasonable demand... provide a reliable and secure supply, include a reasonable “buffer” against uncertainties, and satisfy all other reasonable needs.”¹

The proceeding for A.12-04-019 moved forward in two phases. Phase 1 addressed Cal-Am’s request for a Certificate of Public Convenience and Necessity (“CPCN”) for the MPWSP. Phase 2 concerned matters related to the Groundwater Replenishment Project (“GWR”) (later termed the “Pure Water Monterey Ground Water Replenishment Project”).

The Commission addressed Phase 2 issues in D.16-09-021, adopted on September 15, 2016. That decision authorized Cal-Am to move forward with the construction and recovery in rates of the Monterey Pipeline and Pump Station and the purchase of GWR water by Cal-Am under a Water Purchase Agreement.

On September 20, 2018, the Commission issued D.18-09-018, granting Cal-Am a CPCN to construct a 6.4 million gallons per day (“mgd”) desalination plant and certified the Final Environmental Impact Report/Environmental Impact Statement. In addition, the Commission made numerous findings regarding the financing and ratemaking issues associated with the MPWSP.

Adjustments to Financing and Ratemaking of the Comprehensive Settlement Framework

In D.18-09-017, the Commission found that the “proposed financing framework set out in the Comprehensive Settlement should be adopted” with conditions.² The Comprehensive Settlement was submitted to the Commission by sixteen parties on July 31, 2013. It addresses O&M expenses, cost caps, financing and ratemaking for the MPWSP. Ordering Paragraph 25 of D.18-09-017 directs Cal-Am to take certain actions with respect to the Comprehensive Settlement:

California-American Water Company shall submit a Tier 3 advice letter to the Commission that provides for specific adjustments to the framework set out in sections 7, 8 and 10-15 of the proposed Comprehensive Settlement Agreement, after consultation with Commission Water Division Staff and parties to the proceeding. The Tier 3 advice letters shall also provide specific detail to implement the provisions consistent with this decision. The Tier 3 advice letter shall be submitted no later than January 1, 2019.

In compliance with Ordering Paragraph 25, Cal-Am consulted with the parties to the proceeding on December 10, 2018 via an all-party conference call, and with Water Division staff on December 18, 2018 via a meeting at Commission offices.

Attachment A reflects the adjustments to the Comprehensive Settlement Agreement as directed by the Commission in D.18-09-017.³ For example, it reflects the updated cost cap, provides that costs exceeding the cost cap require a petition to modify, and changes the name of Surcharge 2

¹ D.18-09-017, p.169, Finding of Fact 25.

² D.18-09-017, p.195, Conclusions of Law 19.

³ Attachment A is a marked-up version of Sections 6, 7, 8, 11, 12, 13, 14 and 15 of the Comprehensive Settlement. Attachment B is a clean version of the same document.

to MPWSP Construction Funding Charge. Attachment A and B also reflects Cal-Am's four proposed additional modifications, which are described below.

1. The first proposal is to modify the MPWSP Construction Funding Charge from \$71.5 million to \$25.0 million. The purpose of this surcharge is to reduce the amount of the project subject to financing but doing so in a way that provides a "smooth transition in rates from the final period under the Surcharge to the year 1 revenue requirement of the desalination plant." The surcharge was designed to be implemented after approval of the CPCN and continue until the desalination plant goes into rates. The \$25.0 million recommended amount is smaller due to: (1) reduced construction costs with exclusion of the Phase 2 costs, (2) a compressed construction period versus what was envisioned in 2013, (3) the delay of the Surcharge until after the Tier 3 is approved, (4) the approval of the Phase 2 costs going into rates in 2019, and (5) other additions to Monterey rates that have created a smaller capacity to implement a larger surcharge. The 4-year forecast of the Monterey average residential total bill (2018-2022), is included as Attachment C. The 4-year forecast shows how the surcharge capacity of \$25.0 million moderates the rate increase and provides a smooth transition in rates.

2. The second proposal is to clarify that the MPWSP Construction Funding Charge be implemented within 30 days after the Tier 3 advice letter is approved. The MPWSP financial model assumed that the Surcharge would be implemented promptly after the CPCN. Cal-Am proposes to implement the Surcharge to be set at a rate equal to 10% of the district revenue requirement via a Tier 1 advice letter on July 1, 2019. The rate would be changed quarterly via a Tier 1 filing and extend until the construction is completed. Based on the financial model the Surcharge would increase to 15% on January 1, 2020, and 26% on January 1, 2021. The current financial model assumes a period of 29 months from July 1, 2019 through December 31, 2021. The Construction Funding Charge Memorandum Account would track the \$25.0 million target against actual surcharge collections. If the surcharge percentage is over or under-collecting against the target, Cal-Am will submit a Tier 2 advice letter to change the percentage surcharge from the amounts stated above and assumed in the financial model.

3. The third proposal is to update Section 12.2 of the Comprehensive Settlement to apply the first 50% of the funds collected under the MPWSP Construction Funding Charge to the "Remaining CAW-Only Facilities." The remaining 50% would be applied to the desalination plant after permits required to commence construction have been obtained. This is in keeping with the terms of the Comprehensive Settlement, which directed that the CAW-Only Facilities be funded first. These funds would still be collected and netted against the construction costs through a memorandum account, as described in the ratemaking section of the Comprehensive Settlement (Sections 6.8, 7.3 and 14).

4. The fourth proposal is to update the financing and ratemaking to account for recently approved Commission decisions that update certain ratemaking components. This includes Cal-Am's recent cost of capital decision (D.18-03-035), as well as Cal-Am's General Rate Case decision (D.18-12-021). The Comprehensive Settlement assumed that the financing, ratemaking and Allowance for Funds Used During Construction ("AFUDC") would be based on the current and effective cost of capital. D.18-03-035 became effective January 1, 2018. Thus, for calculations prior to January 1, 2018, the cost of capital from D.12-07-009 applies; for assumptions and calculations on or after January 1, 2018, the current and effective cost of capital set in D.18-03-035 applies.

Similarly, the depreciation rates in Section 14.3 of the Comprehensive Settlement should be based on the rates approved in D.18-12-021. If depreciation rates change prior to the desalination plant and Remaining Cal-Am Only Facilities going into service, the current and effective rates should be used for revenue requirement purposes.

Lastly, income tax rates and tax provisions need to be updated in the financial model based on rates approved in D.18-12-021 that reflect changes associated with the 2017 Tax Cut and Jobs Act.

Attachment C is a portion of the MPWSP financial model that was provided as part of the testimony in the proceeding. The financial model provides an approximation of the capital and O&M costs and the revenue requirement for the project, including the various components to the financing plan. The financial model and the long range residential rate forecast are provided to show how the adjustments to the construction funding charge are designed to smooth out the overall rate impacts to customers. The model and long-term forecast are included as Attachment C.

Memorandum Accounts

D.18-09-017 also provided direction to Cal-Am regarding establishment of certain memorandum accounts:

Ordering Paragraph 20. Rate recovery for any Operations and Maintenance expenditures will be authorized consistent with the framework set forth in Section 8 of the Comprehensive Settlement.

Ordering Paragraph 27. California-American Water Company shall record and track separately all collections and expenditures of the Construction Funding Charge in a memorandum account. If the Monterey Peninsula Water Supply Project does not go online or become used or useful to ratepayers the funds collected shall be returned to ratepayers.

Ordering Paragraph 28. California-American Water Company shall record and track all capital costs for the MPWSP in a memorandum account. All financing, expenditures, schedule, and progress with construction for the Monterey Peninsula Water Supply Project shall be included in Cal-Am's quarterly reports, along with any information that the Commission Water Division staff reasonably requires, and any other information reasonably necessary for a full and complete reporting to the Commission.

In compliance with D.18-09-017 and the above-referenced Ordering Paragraphs, Cal-Am seeks to establish the following three memorandum accounts.

1. MPWSP Phase 1 Project Cost Memorandum Account ("Project Cost Memorandum Account" or "PCMA"). This memo account will record and track the capital cost for the desalination plant and the Remaining Cal-Am Only Facilities (Phase 1 project). The PCMA will also track capital costs and the allocated portion of the CFMA in order to calculate AFUDC. Separate subaccounts will track capital costs associated with the desalination plant and the

Remaining Cal-Am Only Facilities and the Construction Funding Charge allocated to the desalination plant and the Remaining Cal-Am Only Facilities, respectively. It would also track for recovery any capital and financing costs between the date facilities are placed in service and prior to the Commission approving the costs to be included in plant in service and recovered in base rates. The tier 2 advice letter process would place the revenue requirement associated with the Phase 1 project into rates to coincide with the in-service date of the facilities. Should there be a gap in approval, the revenue requirement would be recorded to the PCMA and interest based on the 90-day commercial paper rate would apply.

2. MPWSP Construction Fund Charge Memorandum Account (“Construction Funding Charge Memorandum Account” or “CFMA”). This memo account will track and record separately all collections of the Construction Funding Charge. Separate subaccounts will track the funds collected and applied to the desalination plant and the Remaining Cal-Am Only Facilities. Cal-Am will also track the differences between estimated and actual surcharge collections to ensure that adjustments to the surcharge rate are made to track to the collection of the \$25.0 million amount.

3. MPWSP Operations and Maintenance Memorandum Account (“O&M Memorandum Account” or “MOMMA”). This account is established in compliance with Ordering Paragraph 20 and will track the differences between estimated costs adopted through the Tier 2 advice letter process and the actual incurred costs during the period of time from the beginning operation of the plant until the time an estimate of future costs is filed as part of a future general rate case application. It is assumed that O&M costs during plant startup will be capitalized as part of the project costs. However, if for accounting reasons certain O&M costs are required to be expensed, those costs will also be tracked in the MOMMA.

Request:

As stated above, and in compliance with D.18-09-017, Cal-Am requests, through this advice letter, authorization from the California Public Utilities Commission (“Commission”) to:

- adjust the financing and ratemaking framework set out in the proposed Comprehensive Settlement Agreement
- implement the proposed modified financing and ratemaking framework;
- establish the Project Cost Memorandum Account;
- establish the Construction Fund Charge Memorandum Account; and
- establish the Operations and Maintenance Memorandum Account.

Tier Designation:

This advice letter is submitted pursuant to D.18-09-017 and General Order No. 96-B, and is designated as a Tier 3 filing.

Effective Date:

California American requests an effective date of December 31, 2018, the date of filing.

RESPONSE OR PROTEST⁴

⁴ G.O. 96-B, General Rule 7.4.1

Anyone may submit a response or protest for this 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 grounds⁵ 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 relitigating 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.

Water Division 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
Division of Water and Audits
505 Van Ness Avenue
San Francisco, CA 94102

On the same day the response or protest is submitted to Water Division, the respondent or protestant shall send a copy of the protest to Cal-Am at:

Email Address:

kamilah.jones@amwater.com

Mailing Address:

4701 Beloit Drive
Sacramento, CA 95838

sarah.leeper@amwater.com

555 Montgomery Street, Suite 816
San Francisco, CA 94111

jeffrey.linam@amwater.com

655 W. Broadway, Suite 1410
San Diego, CA 92101

⁵ 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 Water Division, 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.

REPLIES⁶

The utility shall reply to each protest and may reply to any response. Any reply must be received by Water Division 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.

This filing will not cause the withdrawal of service, nor conflict with other schedules or rules.

If you have not received a reply to your protest within 10 business days, please contact Kamilah Jones at (916) 568-4232.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Jeffrey T. Linam

Jeffrey T. Linam
Vice President of Rates & Regulatory

⁶ G.O. 96-B, General Rule 7.4.3

PRELIMINARY STATEMENT
Summary Table

Sheet 3

| Reference | Account | Tariff |
|-----------|---|--------|
| BJ | Tax Cuts and Jobs Act Memorandum Account | 8717-W |
| BK | General Rate Case Interim Rate True-up Memorandum Account | 8751-W |
| BL | Cost of Capital Memorandum Account | 8756-W |
| BM | MPWSP Phase 1 Project Cost Memorandum Account (PCMA) | XXXX-W |
| BN | MPWSP Construction Fund Charge Memorandum Account (CFMA) | XXXX-W |
| BO | MPWSP Operations and Maintenance Memorandum Account (MOMMA) | XXXX-W |

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| (TO BE INSERTED BY UTILITY) | ISSUED BY | (TO BE INSERTED BY C.P.U.C.) |
| Advice 1220 | J. T. LINAM | Date Filed <u>December 31, 2018</u> |
| Decision | DIRECTOR - Rates & Regulatory | Effective _____ |
| | | Resolution _____ |

PRELIMINARY STATEMENT
(Continued)

Sheet 72

BM. MPWSP Phase 1 Project Cost Memorandum Account

(N)

California-American Water Company requests to establish a MPWSP Phase 1 Project Cost Memorandum Account (PCMA).

1. **PURPOSE:** The purpose of the PCMA is to record and track the capital cost associated with the desalination plant and the Remaining Cal-Am Only Facilities (Phase 1 project) as approved in D.18-09-017. The PCMA will track capital costs and the allocated portion of the Construction Funding Charge in separate subaccounts for the desalination plant and remaining Cal-Am-Only facilities, in order to calculate the Allowance for Funds Used During Construction (AFUDC). AFUDC will be calculated monthly based on the capital costs net of the construction funding charge collections. The PCMA will also track and record the revenue requirement and related financing costs for any portion of Phase 1 Costs placed in service prior to the Commission approving the costs to be included in plant in service and recovered in base rates.
2. **APPLICABILITY:** The Monterey County District Main Service Area, which includes Bishop, Hidden Hills and Ryan Ranch.
3. **ACCOUNTING PROCEDURE:** California-American Water Company shall maintain the PCMA by making entries at the end of each month as follows:
 - a. A debit entry shall be made to the PCMA at the end of each month to record the incremental project/capital cost. Separate subaccounts will record costs for the desalination plant and remaining Cal-Am-Only facilities.
 - b. A credit entry shall be made to the PCMA at the end of each month to record collections of the Construction Funding Charge allocated by subaccount to the desalination plant and remaining Cal-Am-Only facilities.
 - c. A credit/debit entry shall be made to the PCMA for AFUDC based on the net balance.
 - d. A debit entry shall be made to the PCMA at the end of each month to record any revenue requirement including financing costs that may occur in between the time the cost are placed In-Service and prior to the Commission approval of base rates.
 - e. Interest shall accrue monthly to the PCMA on any recorded revenue requirement from item 3.d. above on a monthly basis by applying a rate equal to one-twelfth of the 3-month non-financial Commercial Paper Rate, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of-month and the end-of-month balances.
4. **EFFECTIVE DATE:** The PCMA shall go into effect on December 31, 2018, per D.18-09-17.
5. **RATEMAKING PROCEDURE:** In accordance with D.18-09-017 a tier 2 Advice Letter will be filed that will reflect Revenue Requirement to put into rates associated with the PCMA.

(N)

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| (TO BE INSERTED BY UTILITY) | | ISSUED BY | (TO BE INSERTED BY C.P.U.C.) | |
|-----------------------------|------|-------------------------------|------------------------------|-------------------|
| Advice | 1220 | J. T. LINAM | Date Filed | December 31, 2018 |
| Decision | | DIRECTOR - Rates & Regulatory | Effective | |
| | | | Resolution | |

PRELIMINARY STATEMENT
(Continued)

Sheet 73

BN. MPWSP Construction Fund Charge Memorandum Account

(N)

California-American Water Company requests to establish a MPWSP Construction Fund Charge Memorandum Account (CFMA).

1. PURPOSE: The purpose of the CFMA will be to track and record separately all collections of the Construction Fund Charge. Separate subaccounts will track the funds collected and applied to the desalination plant and the Remaining Cal-Am Only Facilities. Cal-Am will also track the differences between estimated and actual surcharge collections to ensure that adjustments to the surcharge rate are made to track to the collection of the \$25.0 million amount.
2. APPLICABILITY: The Monterey County District Main Service Area, which includes Bishop, Hidden Hills and Ryan Ranch.
3. ACCOUNTING PROCEDURE: California-American Water Company shall maintain the CFMA by making entries at the end of each month as follows:
 - a. A debit entry shall be made to the CFMA at the end of each month to record customer collections from the Construction Funding Charge.
 - b. A credit entry shall be made to the CFMA at the end of each month should the Commission require any refunds of collections of the Construction Funding Charge.
4. EFFECTIVE DATE: The CFMA shall go into effect on December 31, 2018, per D.18-09-17, to reflect all above-mentioned collections.
5. RATEMAKING PROCEDURE: In accordance with D.18-09-017, a Tier 2 Advice Letter will be filed with the Commission to place into rates the revenue requirement associated with the Phase 1 costs that reflect collections from customers through the CFMA.

(N)

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| Advice | 1220 | J. T. LINAM | Date Filed | <u>December 31, 2018</u> |
| Decision | | DIRECTOR - Rates & Regulatory | Effective | _____ |
| | | | Resolution | _____ |

PRELIMINARY STATEMENT
(Continued)

Sheet 74

BO. MPWSP Operations and Maintenance Memorandum Account

(N)

California-American Water Company requests to establish a MPWSP Operations and Maintenance Memorandum Account (MOMMA).

1. PURPOSE: The MOMMA is established in compliance with Ordering Paragraph 20 of D.18-09-017 and will track the differences between estimated costs adopted through the Tier 2 advice letter process and actual O&M costs incurred during the period of time from the beginning of operation of the plant until the time an estimate of future costs is determined as part of a future general rate case application. It is assumed that O&M costs during plant startup will be capitalized as part of the project costs. However, if for accounting reasons certain O&M costs are required to be expensed, those costs will also be tracked in the MOMMA.
2. APPLICABILITY: The Monterey County District Main Service Area, which includes Bishop, Hidden Hills and Ryan Ranch.
3. ACCOUNTING PROCEDURE: California-American Water Company shall maintain the MOMMA by making entries at the end of each month as follows:
 - a. A debit entry shall be made to the MOMMA at the end of each month to record the actual O&M cost.
 - b. A credit entry shall be made to the MOMMA at the end of each month to record the estimated O&M cost.
 - c. A debit entry shall be made to the MOMMA at the end of the month for any O&M cost that are not capitalized as part of the project costs.
 - d. Interest shall accrue to the MOMMA on a monthly basis by applying a rate equal to one-twelfth of the 3-month non-financial Commercial Paper Rate, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of-month and the end-of-month balances.
4. EFFECTIVE DATE: The MOMMA shall go into effect on December 31, 2018, per D.18-09-17, to reflect all above-mentioned O&M Cost.
5. RATEMAKING PROCEDURE: In accordance with D.18-09-017 a Tier 2 Advice Letter will be filed to place into rates the estimated O&M costs associated with the Phase 1 project. Any balances recorded to the MOMMA as well as future O&M costs will be addressed in the following general rate case proceeding.

(N)

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| (TO BE INSERTED BY UTILITY) | | ISSUED BY | (TO BE INSERTED BY C.P.U.C.) | |
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| Advice | 1220 | J. T. LINAM | Date Filed | December 31, 2018 |
| Decision | | DIRECTOR - Rates & Regulatory | Effective | _____ |
| | | | Resolution | _____ |

MONTEREY DISTRICT SERVICE LIST
CALIFORNIA-AMERICAN WATER COMPANY
ADVICE LETTER 1220

(See Attached)

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