

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 20, 2022

Jonathan Morse  
Sr. Manager Rates & Regulatory  
California-American Water Company  
520 Capitol Mall Ste. 630  
Sacramento, CA 95814

Dear Mr. Morse,

The Water Division of the California Public Utilities Commission has approved California-American Water Company's Advice Letter No. 1383, filed on August 15, 2022, regarding authorization to establish Warring Memorandum Account Tariff Integration Post-Acquisition for the Piru (Warring) Service Area.

Enclosed are copies of the following revised tariff sheets, effective August 15, 2022, for the utility's files:

<b>P.U.C.</b>	
<b>Sheet No.</b>	<b>Title of Sheet</b>
10590-W	Preliminary Statement, Summary Table, Sheet 1
10591-W	Preliminary Statement, Summary Table, Sheet 2
10592-W	Preliminary Statement (Continued), AH. The Memorandum Account for Environmental Improvements and Compliance Issues for Acquisitions, Sheet 1
10593-W	Preliminary Statement (Continued), BU. Warring Transaction Memorandum Account (WTMA), Sheet 1
10594-W	Table Of Contents, Sheet 1

Please contact Bradley Leong at [BL4@cpuc.ca.gov](mailto:BL4@cpuc.ca.gov) or 415-703-2307, if you have any questions.

Thank you.

Enclosures

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

**Advice Letter Cover Sheet**

<b>Utility Name:</b> California American Water	<b>Date Mailed to Service List:</b> August 15, 2022
<b>District:</b> Piru (Warring) Service Area	
<b>CPUC Utility #:</b> U210W	<b>Protest Deadline (20<sup>th</sup> Day):</b> Sept 4, 2022
<b>Advice Letter #:</b> 1383	<b>Review Deadline (30<sup>th</sup> Day):</b> Sept 14, 2022
<b>Tier</b> <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input checked="" type="checkbox"/> Compliance	<b>Requested Effective Date:</b> August 15, 2022
<b>Authorization</b> D. 22-08-005	
<b>Description:</b> Warring Memorandum Account Tariff Integration Post-Acquisition	<b>Rate Impact:</b> \$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.

**Utility Contact:** Chase Grady

**Phone:**

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**Utility Contact:** Jonathan Morse

**Phone:** 916-568-4237

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<b>DWA USE ONLY</b>
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DATE

STAFF

COMMENTS

_____	_____	_____
_____	_____	_____
_____	_____	_____

APPROVED

WITHDRAWN

REJECTED

**Signature:** \_\_\_\_\_

**Comments:** \_\_\_\_\_

**Date:** \_\_\_\_\_

\_\_\_\_\_



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August 15, 2022

ADVICE LETTER NO. 1383

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Pursuant to General Order 96-B, California-American Water Company (“California American Water”) (U210W) hereby submits for review this advice letter, including tariff sheets applicable to California American Water’s Southern Division.

**Background:**

California American Water filed Application (“A.”) 20-04-017 requesting the approval of the sale of Warring Water Service, Inc.’s (“Warring”) assets to California American Water. On August 4, 2022, the Commission approved the asset sale in Decision (“D.”) 22-08-005.

**Discussion:**

The requests contained in this advice letter relate to Ordering Paragraphs (“OP”) 7 & 10 of D. 22-08-005, which state:

7. *California American Water Company shall file within 10 days of this decision a Tier 1 Advice Letter to establish a Warring Transaction Cost Memorandum Account and to include Warring in its existing Memorandum Account for Environmental Improvement and Compliance Issues for Acquisitions.*
10. *California American Water Company’s request for authorization to establish a Warring Transaction Memorandum Account to record all of its future transaction costs consistent with this Decision is granted.*

Based on the foregoing OPs, California American Water submits the following requests to incorporate Warring’s memorandum accounts into California American Water’s tariffs.

**Request:**

In accordance with OP 7 of D.22-08-005, California American Water requests authorization to establish the Warring Transaction Costs Memorandum Account (WTCMA) and to expand California American Water’s existing Memorandum Account for Environmental Improvement and Compliance Issues with Acquisitions to include Warring.

**Effective Date:**

California American Water submits this as a Tier 1 advice letter and requests an effective date of August 15, 2022.

**Notice:**

Pursuant to Section 4.3 of General Order No. 96-B, a copy of this advice letter is being provided to those entities listed in the attached “SERVICE LIST PURSUANT TO SECTION 4.3 OF G.O. NO. 96-B.” Per guidance from the California Public Utilities Commission’s Water Division, during the COVID-19 pandemic, advice letters will only be delivered electronically to the service list.

Hardcopy advice letters will be mailed as soon as administrative staff are able to return to California American Water offices.

**RESPONSE OR PROTEST**<sup>1</sup>

Anyone may respond to or protest this advice letter.

A response supports the filing and may contain information that proves useful to the Commission in evaluation the advice letter.

A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

- (1) The utility did not properly serve or give notice of the advice letter;
- (2) The relief requested in the advice letter 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 advice letter contain material errors or omissions;
- (4) The relief requested in the advice letter is pending before the Commission in a formal proceeding; or
- (5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
- (6) The relief requested in the advice letter 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 shall provide citations or proofs where available to allow staff to properly consider the protest.

A response or protest must be made in writing or by electronic mail and must be received by the Water Division within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3<sup>rd</sup> floor  
California Public Utilities Commission,  
505 Van Ness Avenue, San Francisco, CA 94102  
[water\\_division@cpuc.ca.gov](mailto:water_division@cpuc.ca.gov)

On the same date the response or protest is submitted to the Water Division, the respondent or protestant shall send a copy to California American Water, addressed to:

---

<sup>1</sup> G.O. 96-B, General Rule 7.4.1

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

If you have not received a reply to your protest within 10 business days, please contact Jonathan Morse at (916) 568-4237.

CALIFORNIA-AMERICAN WATER COMPANY

*/s/ Chase Grady*

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Chase Grady  
Associate Rates & Regulatory Analyst

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
10590-W	PRELIMINARY STATEMENT Summary Table Sheet 1	10550-W
10591-W	PRELIMINARY STATEMENT Summary Table Sheet 2	10551-W
10592-W	PRELIMINARY STATEMENT (Continued) Sheet 1	10201-W
10593-W	PRELIMINARY STATEMENT (Continued) Sheet 1	
10594-W	TABLE OF CONTENTS Sheet 1	10589-W

PRELIMINARY STATEMENT  
Summary Table

Sheet 1

Reference	Account	Tariff
A	Territory Served by Utility	10169-W
B	Types and Classes of Service	10169-W
C	Description of Service	10170-W
D	Procedure to Obtain Service	10170-W
E	Symbols	10170-W
F	Affiliate Transaction Rule IV.D.2 Memorandum Account (ATRMEMO)	10171-W
G	Catastrophic Event Memorandum Account (CEMA)	10172-W, 10173-W
I	Cease and Desist Order Memorandum Account (CDOMA)	10174-W
J	Cease and Desist Order - Penalties and Fines Memorandum Account	10175-W
K	Chromium-6 Memorandum Account – Sacramento Service Area	10176-W, 10177-W
L	Consolidated Expense Balancing Account	10178-W
M	Emergency Rationing Costs Incurred by CAW Memorandum Account	10179-W
N	Endangered Species Act (ESA) Memorandum Account (Monterey Service Area)	10180-W
P	Garrapata Service Area - SDWSRF Loan Repayment Balancing Account	10181-W
R	Customer Assistance Program (CAP) Balancing Account	10183-W, 10184-W
S	NOAA_ESA Memorandum Account	10185-W
T	Other Post-Employment Benefits Balancing Account	10186-W
U	Pension Balancing Account (PBA)	10187-W
V	San Clemente Dam Balancing Account	10188-W
W	Coastal Water Project Memorandum Account	10189-W
Y	Seaside Groundwater Basin Balancing Account	10190-W
Z	Water Contamination Litigation Expense Memorandum Account (WCLEMA)	10191-W
AA	West Placer Memorandum Account	10192-W
AB	Water Revenue Adjustment Mechanism/Modification Cost Balancing Account (WRAM/MCBA)	10193-W, 10194-W, 10195-W, 10196-W
AD	Water Cost of Capital Mechanism (WCCM)	10197-W
AE	Credit Card Fees Memorandum Account	10198-W
AG	School Lead Testing Memorandum Account (SLTMA)	10200-W
AH	The Memorandum Account for Environmental Improvement and Compliance Issues for Acquisitions	10592-W
AI	Dunnigan Consulting Memorandum Account	10202-W
AJ	Water-Energy Nexus Program Memorandum Account (WENMA)	10203-W

(C)

(Continued)

(TO BE INSERTED BY UTILITY)		ISSUED BY	(TO BE INSERTED BY C.P.U.C.)	
Advice	1383	J. T. LINAM	Date Filed	08/15/2022
Decision	22-08-005	DIRECTOR - Rates & Regulatory	Effective	08/15/2022
			Resolution	

PRELIMINARY STATEMENT  
Summary Table

Sheet 2

Reference	Account	Tariff
AK	Special Facilities Fee Memorandum Account	10204-W, 10205-W
AN	Public Safety Power Shut-Off Memorandum Account (PSPSMA)	10208-W, 10209-W
AO	2019 General Rate Case Interim Rate True-up Memorandum Account	10210-W
AQ	Two-Way Tax Memorandum Account	10556-W
AR	Sustainable Groundwater Management Act Memorandum Account (SGMA)	10211-W
AS	Group Insurance Balancing Account (GIBA)	10212-W
AT	Rio Plaza Groundwater Management Memorandum Account	10213-W
AU	Rio Plaza Transaction Memorandum Account	10214-W
AV	MPSWP Phase 1 Project Cost Memorandum Account (PCMA)	10215-W
AW	MPSWP Operations and Maintenance Memorandum Account (MOMMA)	10216-W
AX	Meadowbrook CIAC Regulatory Asset	10217-W
AZ	Monterey Wastewater Purchased Power Balancing Account	10218-W
BD	Fruitridge Vista Transaction Memorandum Account (FVTMA)	10220-W
BF	Hillview Service Area Memorandum & Balancing Accounts	10222-W
BG	Hillview Memorandum Account for Deferred Income Taxes (HMADIT)	10223-W
BH	Central Basin Contamination Memorandum Account	10224-W
BI	Drought Memorandum Account (DRMA)	10225-W
BK	East Pasadena Transaction Memorandum Account (EPTMA)	10227-W
BL	East Pasadena Purchased Power Balancing Account (EPPPBA)	10228-W
BM	East Pasadena Purchased Water Balancing Account (EPPWBA)	10229-W
BN	East Pasadena Pumping Assessment Cost Balancing Account (EPPACBA)	10230-W
BO	Drinking Water Fees Memorandum Account	10231-W
BP	TCP Litigation Proceeds Memorandum Account	10232-W
BQ	Central Satellite Service Area - Cost Allocation Tariff	10233-W, 10234-W
BR	Central Division – Chualar System – Tariff Rate Design	10235-W
BS	Larkfield Consolidation Tariff	10236-W, 10237-W
BT	Annual Consumption Adjustment Mechanism	10238-W
BU	Warring Transaction Memorandum Account (WTMA)	10593-W

(N)

(Continued)

(TO BE INSERTED BY UTILITY)		ISSUED BY	(TO BE INSERTED BY C.P.U.C.)	
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PRELIMINARY STATEMENT  
(Continued)

Sheet 1

**AH. The Memorandum Account for Environmental Improvements and Compliance Issues for Acquisitions.**

**1. PURPOSE:**

The purpose of the account is to track costs associated with required improvements related to environmental and compliance issues in the Dunnigan, Geyserville, Meadowbrook, Rio Plaza, Fruitridge Vista, Hillview, East Pasadena, and Piru (Warring) service territories. Example of such costs include, but are not limited to, nitrate mitigation, installation of geosynthetic liners, repair of a cracked surface seal on the main well, construction of a back-up well and back-up electrical power source to maintain minimum pressure in the event of failure in grid power. This account excluded costs related to hexavalent chromium mitigation since there is a separate memorandum account for those costs.

(C)

**2. APPLICABILITY:**

California American Water’s East Pasadena Service Areas; Hillview Service Areas; Fruitridge Vista Service Areas; Sacramento Service Area – Dunnigan, Geyserville, and Meadowbrook Service Areas; Los Angeles County District – Rio Plaza, in the City of Oxnard, Piru (Warring), Ventura County

(C)

**3. ACCOUNTING PROCEDURE:**

- a. A debit entry will be created to capture costs associated with the account.
- b. A debit or credit entry equal to interest on the balance in the account at the beginning of the month and half the balance after the above entries, at a rate equal to one-twelfth of the rate on 90-day non-financial Commercial Paper, as reported in the Federal Reserve Statistical Release, H.15 or its successor.
- c. A credit entry will be made to transfer the balances to the appropriate district Consolidated Expense Balancing Account’s (“CEBA”) upon Commission approval.

**4. RATEMAKING PROCEDURE:**

There is currently no ratemaking component to the memorandum account. Requests for recovery of any balance are to be processed according to General Order 96-B and Standard Practices or otherwise determined in a Commission decision. Upon Commission review and approval, balances shall be transferred to the appropriate District CEBA(s) for recovery/fund.

(Continued)

(TO BE INSERTED BY UTILITY)		ISSUED BY	(TO BE INSERTED BY C.P.U.C.)	
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			Resolution	_____

PRELIMINARY STATEMENT  
(Continued)

Sheet 1

**BU. Warring Transaction Memorandum Account (WTMA)**

(N)

**1. PURPOSE:**

The purpose of the WTMA is to record and track transactional costs associated with the purchase of Warring Water Service, Inc. Examples of such costs include but are not limited to expenses for: outside legal services, engineering, surveying, the appraisal, customer noticing, and other professional activities necessary to complete the transaction. Decision 22-08-005 granted California American Water authority to establish the WTMA.

**2. APPLICABILITY:**

California American Water's Piru (Warring) Service Area in Ventura County.

**3. ACCOUNTING PROCEDURE:**

California-American Water shall maintain the WTMA by making entries at the end of each month as follows:

- a. A debit entry will be created to capture transaction costs associated with the acquisition of Warring Water Service, Inc.
- b. A debit or credit entry equal to interest on the balance in the account at the beginning of the month and half the balance after the above entries, at a rate equal to one-twelfth of the rate on 90 day non-financial Commercial Paper, as reported in the Federal Reserve Statistical Release, H.15 or its successor.
- c. A credit entry will be made to transfer the balances to the appropriate district Consolidated Expense Balancing Account's (CEBA) upon Commission approval.

**4. RATEMAKING PROCEDURE:**

The memorandum account currently has no rate component.

**5. DISPOSITION:**

Disposition of amounts recorded in the WTMA shall be determined through a Tier 3 advice letter filing or in California American Water's next General Rate Case application or as otherwise determined by the Commission. Upon Commission review and approval, balances shall be transferred to the appropriate district's CEBA for recovery/refund.

(N)

(Continued)

(TO BE INSERTED BY UTILITY)		ISSUED BY	(TO BE INSERTED BY C.P.U.C.)	
Advice	1383	J. T. LINAM	Date Filed	<u>08/15/2022</u>
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<b><u>SERVICE AREA MAP:</u></b>	
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		Resolution      _____

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**ADVICE LETTER 1383**

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**LOS ANGELES COUNTY DISTRICT SERVICE LIST**  
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**ADVICE LETTER 1383**

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**PIRU (WARRING) DISTRICT SERVICE LIST**  
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**ADVICE LETTER 1383**

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