



**CALIFORNIA WATER SERVICE COMPANY**  
1720 NORTH FIRST STREET  
SAN JOSE, CA 95112 (408) 367-8200 F (408) 367-8428

February 6, 2015

**Advice Letter No. 2155**

**CALIFORNIA WATER SERVICE COMPANY (U 60 W)**

To the Public Utilities Commission of the State of California (Commission):

California Water Service Company ("Cal Water") hereby transmits for filing the following changes in its tariff schedules:

| <u>CPUC</u><br><u>Sheet No.</u> | <u>Title of Sheet</u>      | <u>Schedule</u><br><u>No.</u> | <u>Canceling</u><br><u>CPUC</u><br><u>Sheet No.</u> |
|---------------------------------|----------------------------|-------------------------------|---|
| TBD                             | Preliminary Statement AS   |                               | New   |
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**Summary**

By this Tier 2 advice letter, Cal Water requests authorization to open a Discharge Permit Memorandum Account to track costs relating to compliance with a new general National Pollutant Discharge Elimination System ("NPDES") permit for discharges from drinking water systems ("General Permit" or "NPDES Permit") adopted by the California State Water Resources Control Board ("SWRCB" or "State Water Board") on November 18, 2014.

Cal Water requests an effective date of February 26, 2015 for the Discharge Permit Memorandum Account, which is the earliest date upon which water purveyors can apply for coverage under the new permit.

As the new NPDES Permit applies to all water purveyors in California, Cal Water notes that all of the benefits of the Discharge Permit Memorandum Account discussed herein apply equally to other water utilities regulated by the Commission.

**Background**

Water purveyors regularly discharge drinking water into storm drains or other conveyances that drain to surface waters. Section 402 of the Clean Water Act requires that a discharge of any pollutant or combination of pollutants to surface waters that are deemed waters of the United States be regulated by a National Pollutant Discharge Elimination System



("NPDES") permit. The California State Water Resources Control Board ("SWRCB" or "State Board") enforces the Clean Water Act and adopted a "Statewide General NPDES Permit for Drinking Water System Discharges to Waters of the United States" ("General Permit" or "NPDES Permit") on November 18, 2014. Water purveyors must apply for the new NPDES permit between February 26 and September 1, 2015. A water purveyor's new NPDES permit becomes effective once the State Board acknowledges the application is complete.

Cal Water has hundreds of discharge points throughout the state, but the majority of these are over 600 water wells. According to preliminary estimates, the potential costs associated with meeting the new NPDES permit requirements in Cal Water's districts will most likely be significant, but will depend upon an individual analysis of each discharge point.

#### A) Drinking Water System Discharge Regulation

Water wholesalers and purveyors are responsible for developing water supplies and providing drinking water to their communities and customers in accordance with statutory requirements of the federal Safe Drinking Water Act and the California Health and Safety Code. Mandatory system-development and system-maintenance activities often result in surface water discharges, either via storm drain systems or other conveyance systems or directly to a surface water body.

Section 402 of the Federal Water Pollution Control Act (also referred to as the Clean Water Act) requires that a discharge of any pollutant or combination of pollutants to surface waters that are waters of the United States, with certain exceptions, be regulated by an NPDES permit. (For the purpose of this discussion, the terms "waters of the United States," "surface waters," and "receiving waters" are used interchangeably unless noted otherwise.) On September 22, 1989, the U.S. Environmental Protection Agency granted the State of California, through the State Water Board and the Regional Water Quality Control Boards ("Regional Water Boards"), the authority to issue general NPDES permits pursuant to Title 40 of the Code of Federal Regulations, Parts 122 and 123.

In accordance with the Clean Water Act, discharges subject to NPDES requirements include discharges of pollutants from drinking water systems. The Act does not include an exemption from federal regulation based on volume or flow of discharge; therefore, all sizes of drinking water systems, including very small systems with small volumes of surface water discharges, are subject to NPDES requirements.

The State Water Board recognizes that, although the quality of the discharges from different locations within a system (raw water, potable water, chlorinated water, etc.) varies, and there are different kinds of drinking water systems, the set of discharges from those systems are fairly uniform throughout the state. In particular, water must be discarded as part of the mandatory activities undertaken by water purveyors to ensure that the water ultimately delivered is safe for drinking.



Despite the similarities, drinking water system discharges in California that enter waters of the U.S. (either directly or via a storm water conveyance system) are regulated differently throughout the state. Many drinking water system discharges are not regulated at all. Others are regulated by various Regional Water Board permits depending upon the region in which the system is located. Some Regional Water Boards regulate the raw and potable drinking water discharges using region-wide low threat-type general NPDES permits that regulate a broad range of constituents through differing regulatory approaches. Other Regional Water Board general permits do not address the constituents of concern from these types of discharges, and/or contain requirements with which it is not feasible for water purveyors to comply without creating obstacles to the proper operation of drinking water systems.

Additionally, most large and small municipalities have Municipal Separate Storm Sewer System (MS4) NPDES permits for discharge of storm water to waters of the U.S. Some MS4 permit holders (permittees) allow drinking water system discharges to enter their storm water systems as authorized non-storm water discharges, typically through established local agreements. Other MS4 permittees do not allow such discharges to enter their storm water systems unless the State Water Board or Regional Water Board separately regulates those discharges prior to entering the system.

#### B) New General Permit for Discharges from Drinking Water Systems

In order to provide consistency throughout the state, the State Water Board opened a proceeding to create a new statewide NPDES permit for discharges from drinking water systems to waters of the United States.<sup>1</sup> The proceeding sought to increase regulatory certainty through a permit that would implement effluent limits, best management practices, and monitoring specific to the water quality threat of their drinking water discharges. More broadly, the fundamental goals of the statewide general permit included regulatory efficiency and consistency, reduced cost of compliance, and implementation of policy exceptions for mandated water system activities.

The State Water Board held numerous workshops to solicit information from all interested parties. Cal Water and the California Water Association actively participated in the workshops. Ultimately, a draft of the NPDES permit was issued on July 3, 2014. The “Fact Sheet on the Proposed General NPDES Permit for Discharges from Drinking Water Systems” on the State Water Board’s website provides a detailed discussion on the development of the new NPDES permit.<sup>2</sup> Interested parties were invited to comment on the draft. In August, 2014, Cal Water and the California Water Association provided

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<sup>1</sup> Title 40 Code of Federal Regulations part 122.28 provides for issuance of general permits to regulate a category of point sources if the sources: (1) involve the same or substantially similar types of operations; (2) discharge the same type of waste; (3) require the same type of effluent limitations or operating conditions; (4) require similar monitoring; and (5) are more appropriately regulated under a general order rather than individual orders.

<sup>2</sup> See [http://www.swrcb.ca.gov/water\\_issues/programs/npdes/docs/dwsgp/draft\\_permit\\_factsheet.pdf](http://www.swrcb.ca.gov/water_issues/programs/npdes/docs/dwsgp/draft_permit_factsheet.pdf).



comprehensive comments on the draft to ensure that the proposed permit made sense in light of actions water purveyors take in order to provide safe, reliable drinking water.<sup>3</sup>

The State Water Board made certain modifications to the draft NPDES permit based upon comments received, and issued a final new NPDES permit No. CAG140001.<sup>4</sup> The new NPDES permit provides consistent and efficient regulatory coverage and requirements for drinking water system discharges statewide that have a low threat to water quality when properly mitigated through implementation of best management practices.

The new NPDES permit authorizes drinking water system discharges of water that is dedicated to drinking water facilities for the primary purpose of providing safe and reliable drinking water including, but not limited to treatment facilities, storage and distribution systems, transmission systems, and water supply and monitoring wells in drinking water aquifers. Regulatory coverage under the new NPDES permit serves as authorization for the holder of the new NPDES permit to discharge water from its drinking water system(s) to waters of the U.S., either directly into waters of the U.S. or via other conveyance, including through a municipal storm sewer system.

## **Discussion**

The new NPDES permit provides tremendous value to water purveyors as explained above, but it does add a new restriction. The new restriction is that any discharges that are likely to cause or contribute to an exceedance of a water quality objective (as measured at the receiving waters of the U.S.) are not authorized under the new NPDES permit.<sup>5</sup> This would require treatment of groundwater with known contaminants to be treated to below the water quality objective before it can be discharged to waste which ultimately flows to a water of the U.S. As a practical matter, this forces water utilities to treat and test<sup>6</sup> water discharges at the sources to protect against potential mixing with other contaminants in storm drains as the discharge waters are conveyed to waters of the U.S.

This new requirement will make a large number of discharges that are necessary in the normal course of business significantly more expensive or, in some cases, economically infeasible. For example, there are wells that are treated that need to be discharged to waste prior to returning to service after maintenance or disinfection. This water cannot be

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<sup>3</sup> The letters are available at:

[http://www.swrcb.ca.gov/water\\_issues/programs/npdes/docs/dwsgp/comments\\_081914/dale\\_gonzales.pdf](http://www.swrcb.ca.gov/water_issues/programs/npdes/docs/dwsgp/comments_081914/dale_gonzales.pdf) and

[http://www.swrcb.ca.gov/water\\_issues/programs/npdes/docs/dwsgp/comments\\_081914/jack\\_hawks.pdf](http://www.swrcb.ca.gov/water_issues/programs/npdes/docs/dwsgp/comments_081914/jack_hawks.pdf).

<sup>4</sup> See

[http://www.swrcb.ca.gov/water\\_issues/programs/npdes/docs/drinkingwater/final\\_statewide\\_wqo2014\\_0194\\_dwq.pdf](http://www.swrcb.ca.gov/water_issues/programs/npdes/docs/drinkingwater/final_statewide_wqo2014_0194_dwq.pdf).

<sup>5</sup> Discharges from drinking water systems must still comply with Regional Basin plans. The Regional Basin plans limit the constituents of concern the particular water of the U.S.

<sup>6</sup> The testing at the point of discharge provides evidence that water purveyors' discharges meet the water quality objectives.



run through treatment facilities because it could ruin, or significantly lessen the life of, the treatment units.

Cal Water owns/operates nearly 600 water supply wells in California. Approximately 176 of these wells have water quality issues that require treatment to potable standards before being pumped into our drinking water systems. About 125 of those wells currently have treatment facilities. The majority of these would not be allowed to discharge as the permit is currently written because there are parameters that are either above or approaching a Maximum Contaminant Level ("MCL").

The remaining 51 wells with water quality issues are standby wells. Standby wells can be used in emergency situations, such as a fire, or severe drought. These wells may be over primary or secondary MCLs, but are still considered suitable for human consumption in the short term. However, standby wells need to be flushed to allow for the collection of a representative sample prior to putting the water into the distribution system, or to collect samples to maintain well status. The frequency for discharging to maintain well status can range from yearly to once every 9 years, depending on the parameter required for analysis. If these wells cannot be discharged, they will have to be moved to inactive status, and then destroyed. The replacement cost for a new well is approximately \$1.5 million but can vary significantly based on depth to water, potential need for treatment, and multiple other factors.

Occasionally some wells can be discharged to land or sanitary sewer, but discharge to storm drains or surface water is usually the only alternative. In some cases, water can be contained and discharged in a controlled manner from a tank or battery of tanks to land or sanitary sewer. However, the discharge rate is generally too great for either of those alternatives to be viable. Sanitary sewer is not always available nearby and may be restrained by available capacity in the sewer system.

Further, it can be very costly to bring temporary tanks on site just to comply with the discharge requirements of the new permit. For a representative well sampling, a typical well will run for 2 hours prior to sampling. For a 1,000 gallons per minute ("gpm") well, that equates to storage of 120,000 gallons of water prior to discharge, or about six portable storage tanks. The cost to rent portable storage tanks to contain the water for a single discharge event would be about \$20,000. However, this is generally not a viable option as most well sites do not have a large enough footprint to accommodate adequate onsite storage capacity.

Costs to install a treatment system just to treat periodic discharges would vary depending primarily on what contaminate requires treatment. For example, contaminants such as nitrate, Volatile Organic Compounds ("VOCs") or Chromium 6 treatment would cost over \$700,000.



There will also be additional non-capital-related costs necessary to apply and comply with the permit requirements. These costs include training, developing standard operating procedures and other administrative expenditures.<sup>7</sup>

The aforementioned cost information is generic in nature. Cal Water will be assessing each of its discharge points to determine the most cost-effective alternative, and to initiate reasonable and prudent discharge activities to comply with the new NPDES permit sometime before September 1, 2015. Nonetheless, all necessary activities will occur prior to or shortly after Cal Water's filing of its 2015 general rate case.

### **Memo Account Request**

General Order 96-B, Water Industry Rule 7.3.2(5), allows a Tier 2 advice letter filing for a "New Memorandum Account request." Given the timing and uncertainty of the costs to comply with the new Discharge Permit, Cal Water requests that the memo account track the following:

- (a) Incremental operations and maintenance ("O&M") and administrative and general ("A&G") costs incurred to comply with the new NPDES permit;
- (b) Incremental revenue requirement of any capital investments placed in service to comply with the new NPDES permit;
- (c) Interest at the 90-day commercial paper rate.

This request is made for all Cal Water's rate areas because all service area's need to meet the compliance requirements of the new NPDES permit. In seeking recovery, Cal Water will make a showing that the requested amounts are not included in rates. Furthermore, establishment of the Discharge Permit MA will not guarantee rate recovery of the recorded costs. Cal Water proposes to seek recovery in accordance with General Order 96-B or in a general rate case.

The proposed Discharge Permit Memorandum Account meets the commonly applied criteria for establishing such accounts as set forth in Resolution W-4824, as follows:<sup>8</sup>

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<sup>7</sup> These costs will include: preparing and submitting a Notice of Intent (NOI); developing Standard Operating Procedures (SOPs) to ensure compliance with effluent limitations, monitoring requirements, record keeping requirements and reporting requirements; developing blueprint to leverage existing information technology resources to gather discharge and compliance information (e.g. use of the existing work orders management database to collect main break information and roll it into the company's environmental information database); conducting training for the company's distribution system staff (main repairs and replacement); conducting training for the company's operations staff (tank/reservoir cleaning, well blow-offs, tank overflows); conducting training for the company's construction staff (oversees contractors for main replacements), and; purchasing field instruments (pH meters, turbidity meters, colorimeters for chlorine residual measurements, tablets for recording field data, etc.) and hiring staff for field audits, emergency response, and investigations.

<sup>8</sup> See Resolution W-4824, *California-American Water (Cal-Am). Order Authorizing Memorandum Account to Track Costs Incurred to Address the State Water Resources Control Board (SWRCB) Cease and Desist Order (CDO) for Unauthorized Diversion of Water from the Carmel River in the Monterey District* (April 8, 2010) at 5.



The expense is caused by an event of an exceptional nature that is not under the utility's control: The need to comply with the State Water Board's new NPDES permit is a regulatory requirement, as discussed above, and is an event of an exceptional nature that is beyond Cal Water's control.

The expense is of a substantial nature in the amount of money involved: As discussed above, the magnitude of the costs of compliance are unknown at this time, but will be substantial. Cal Water has 600 wells, of which 176 have known contaminants. The cost to replace a well costs approximately \$1.5 million. The cost to install a system to treat water with known contaminants such as nitrates, volatile organic compounds ("VOCs") or Chromium 6 has been estimated to be approximately \$700,000.

The expense cannot have been reasonably foreseen in the utility's last GRC and will occur before the utility's next scheduled rate case: Cal Water's last general rate case was filed in July 2012, prior to establishment of the new NPDES permit. As discussed above, Cal Water needs to begin complying with the new NPDES permit before September 1, 2015, 2015. Furthermore, Cal Water believes that there is too much uncertainty surrounding the appropriate cost-effective alternatives to comply with the new NPDES for Cal Water to forecast costs for its July 2015 GRC filing. Finally, Cal Water will likely be incurring substantial compliance costs prior to Test Year 2017 of the company's 2015 GRC.

The ratepayers will benefit by the memorandum account treatment: Ratepayers have benefitted from Cal Water's active participation in the development of the new NPDES permit. Cal Water assisted in molding the permit into a regulatory tool that recognizes the activities taken by water companies in meeting federal and state mandates to deliver safe, reliable drinking water. The new NPDES permit does present challenges as documented above, but the results of the final permit are significantly better than originally presented by the State Water Board (see the State Water Board's website for the history of the permit development).<sup>9</sup>

The new NPDES permit increases regulatory certainty by implementing effluent limits, best management practices, and monitoring specific to the water quality threats of drinking water discharges. Under the new permit, drinking water system discharges can enter the MS4 permit holder's storm water systems as authorized non-storm water discharges. This also provides protection for water purveyors from unplanned discharges that have been the cause of unjust violations and fines. As a benefit to both water companies and ratepayers, this greater certainty will allow water purveyors to better manage their systems. The new NPDES permit also directly benefits ratepayers by helping to protect the waters of the U.S. from pollutants.

A memo account that tracks the costs for compliance in the most cost-effective manner, for later disposition by the Commission, removes economic disincentives for that participation and compliance. When Cal Water is able to identify the most appropriate, cost-effective

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<sup>9</sup> See [http://www.swrcb.ca.gov/water\\_issues/programs/npdes/drinkingwatersystems.shtml](http://www.swrcb.ca.gov/water_issues/programs/npdes/drinkingwatersystems.shtml).



compliance alternative for each discharge point, Cal Water should be encouraged to initiate compliance activities and track the costs in a memo account, rather than proposing potentially speculative capital projects in Cal Water's 2015 GRC, for construction in Test Year 2017. Given the likelihood that significant expenditures may be necessary, ratepayers will benefit from timely compliance with the NPDES permit via a ramping up of costs, rather than a delay that will merely result in a higher cost impact later.

Finally, the memorandum account will not guarantee rate recovery of the recorded costs, and Cal Water will make a showing that any amounts sought for recovery are incremental and not already included in rates. For the above reasons, a memorandum account that tracks the costs for compliance with the new NPDES permit, and thus preserves the full range of regulatory options for disposition of those costs, is in the public interest.

### **Requested Effective Date**

Cal Water is already in the process of conducting a point-by-point analysis of its discharges given the tight timeframe for compliance with the new general NPDES permit. To facilitate these efforts, Cal Water requests an effective date of February 26, 2015 which is the soonest water purveyors are allowed to apply for coverage under the new NPDES permit. While this is less than 30 days after submission of this advice letter, under Water Industry Rule 7.2(2), "Staff may allow a Tier 2 advice letter to be made effective, subject to refund, in less than 30 days" upon "request and justification by the Utility." Granting this request for an effective date that is less than 30 days from submission should not result in any adverse impacts to interested parties or the public interest.

### **Notice and Service**

In accordance with General Order 96-B, General Rule 4.3 (Service Lists) and 7.2 (Serving Advice Letters and Related Documents) and Water Industry Rule 4.1 (Advice Letters Generally), a copy of this advice letter will be mailed or electronically transmitted today to competing and adjacent utilities and other utilities or interested parties having requested such notification. A list of those utilities and/or parties is attached. This advice letter does not seek to increase any rate or charge, so individual customer notice is not required.

### **Response or Protest**

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 evaluating 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. A protest shall provide citations or proofs where available to allow staff to properly consider the protest. The grounds for a protest 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 error 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 response or protest must be made in writing or by electronic mail and must be received by the Division of Water and Audits within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

Tariff Unit, Division of Water and Audits, 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 Division of Water and Audits, the respondent or protestant shall send a copy by mail (or e-mail) to us, addressed to:

Natalie Wales  
California Water Service Company  
1720 North First Street,  
San Jose, California 95112  
Fax 408-367-8430 or  
E-mail [nwales@calwater.com](mailto:nwales@calwater.com)

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Division of Water and Audits 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 on which the proposed protest might be voted.

The advice letter process does not provide for any responses, protests or comments, except for the utility's reply, after the 20-day comment period.

### **Replies:**

The utility shall reply to each protest and may reply to any response. Each reply must be received by the Division of Water and Audits within 5 business days after the end of the protest period, and shall be served on the same day to the person who filed the protest or response.

If you have not received a reply to your protest within 10 business days, contact California Water Service Company at 408-367-8200.



CALIFORNIA WATER SERVICE COMPANY

Advice Letter 2155, Discharge Permit Memorandum Account

Page 10

CALIFORNIA WATER SERVICE COMPANY

A handwritten signature in cursive script that reads "Natalie Wales".

Natalie Wales  
Regulatory Attorney

Enclosures

cc: Ting-Pong Yuen, ORA

|  |                                       |
|--|---------------------------------------|
| <b>CALIFORNIA PUBLIC UTILITIES COMMISSION</b><br><b>DIVISION OF WATER AND AUDITS</b><br><b>Advice Letter Cover Sheet</b> | (Date Filed / Received Stamp by CPUC) |
|--|---------------------------------------|

|                     |   |   |  |
|---------------------|---|---|--|
| <b>AL #</b><br>21xx | <b>Date Mailed to Service List:</b><br>February 6, 2015 | <b>Requested Effective Date:</b><br>February 26, 2015 | <b>Requested Tier:</b><br><b>Tier 1 <input checked="" type="checkbox"/> Tier 2    Tier 3</b> |
|---------------------|---|---|--|

|                              |                       |   |                    |               |              |
|------------------------------|-----------------------|---|--------------------|---------------|--------------|
| <b>Replacing AL#:</b><br>n/a | <b>Authorized by:</b> | <b>Compliance Filing?</b><br>Yes <input checked="" type="checkbox"/> No | <b>Rate Impact</b> | <b>\$</b> n/a | <b>%</b> n/a |
|------------------------------|-----------------------|---|--------------------|---------------|--------------|

|   |  |
|---|--|
| <b><u>The public has 20 days from Date Mailed (above) to protest this advice letter. If you chose to protest or respond to the advice letter, send Protest and/or Correspondence within 20 days to:</u></b> | Director<br>Division of Water and Audits<br>505 Van Ness Ave.<br>San Francisco, CA 94102 |
| <b><u>and if you have email capability, also email to:</u></b>  | <a href="mailto:water_division@cpuc.ca.gov">water_division@cpuc.ca.gov</a>               |
| <b><u>Your protest also must be served on the Utility</u></b>   | (see attached advice letter for more information and grounds for protest)                |

|   |                             |
|---|-----------------------------|
| <b>Company Name:</b> California Water Service Company | <b>CPUC Utility Number:</b> |
| <b>Address:</b> 1720 North First Street               | WTA U-60-W                  |
| <b>City, State, Zip:</b> San Jose, CA 95112           |                             |

|   |                  |                |                       |  |  |           |               |              |              |  |  |  |  |
|---|------------------|----------------|-----------------------|--|--|-----------|---------------|--------------|--------------|--|--|--|--|
| <b>Contact Name:</b>  | <b>Phone No.</b> | <b>Fax No.</b> | <b>Email Address:</b> |  |  |           |               |              |              |  |  |  |  |
| <table border="0" style="width:100%;"> <tr> <td style="font-size: small; vertical-align: middle;">Filer</td> <td>NATALIE WALES</td> <td>408-367-8566</td> <td>408-367-8426</td> <td><a href="mailto:nwales@calwater.com">nwales@calwater.com</a></td> </tr> <tr> <td style="font-size: small; vertical-align: middle;">Alternate</td> <td>JAMES POLANCO</td> <td>408-367-8239</td> <td>408-367-8426</td> <td><a href="mailto:jpolanco@calwater.com">jpolanco@calwater.com</a></td> </tr> </table> | Filer            | NATALIE WALES  | 408-367-8566          | 408-367-8426   | <a href="mailto:nwales@calwater.com">nwales@calwater.com</a> | Alternate | JAMES POLANCO | 408-367-8239 | 408-367-8426 | <a href="mailto:jpolanco@calwater.com">jpolanco@calwater.com</a> |  |  |  |
| Filer   | NATALIE WALES    | 408-367-8566   | 408-367-8426          | <a href="mailto:nwales@calwater.com">nwales@calwater.com</a>     |  |           |               |              |              |  |  |  |  |
| Alternate   | JAMES POLANCO    | 408-367-8239   | 408-367-8426          | <a href="mailto:jpolanco@calwater.com">jpolanco@calwater.com</a> |  |           |               |              |              |  |  |  |  |

**Description:**  
 In this space or on the back of this form:

1. Explain justification for requested Tier – GO 96-B, Water Industry Rule 7.3.2(5)
2. Describe service affected and how it is affected – No services directly affected
3. Describe differences from related Advice Letters (Similar service, replacement filing): n/a

**(FOR CPUC USE ONLY)**

|                          |                                  |                          |          |                          |
|--------------------------|----------------------------------|--------------------------|----------|--------------------------|
| WTS Budget/Activity/Type | Process as:                      | Tier 1                   | Tier 2   | Tier 3                   |
| _____ / _____ / _____    | 20th Day                         | <input type="checkbox"/> | 30th Day | <input type="checkbox"/> |
| <b>Project Manager:</b>  | <b>Suspended on:</b>             |                          |          |                          |
| <b>Analyst:</b>          | <b>Extended on:</b>              |                          |          |                          |
| <b>Due Date:</b>         | <b>Resolution No.:</b>           |                          |          |                          |
| <b>Completion Date:</b>  | <b>AL/Tariff Effective Date:</b> |                          |          |                          |

Preliminary Statement  
(continued)

AS. DISCHARGE PERMIT MEMORANDUM ACCOUNT (DISCHARGE MA)

( N )

1. PURPOSE: The purpose of the Discharge Permit Memorandum Account (Discharge MA) is to track the incremental costs incurred to comply with the general National Pollutant Discharge Elimination System (NPDES) permit for discharges from drinking water systems (General Discharge Permit) issued by the State Water Resources Control Board (State Water Board) on November 18, 2014. The General Discharge Permit governs discharges from drinking water systems into waters of the United States.
  
2. APPLICABILITY: The Discharge Permit MA applies to all regulated operations. This excludes out-of-state affiliates and unregulated operations expenses.
  
3. RATES: The Discharge Permit MA has no rate component.
  
4. ACCOUNTING PROCEDURE:  

Cal Water shall make the entries described below for costs incurred to comply with the General Discharge Permit. The "incremental costs" that may be tracked in this account are costs (including labor, overhead, operations & maintenance expenses, and capital-related costs including return on investment, income taxes, ad valorem tax, depreciation, and other taxes and fees) that are over and above those that the Commission has approved for recovery through base rates.

  - (a) A debit or credit entry equal to incremental expenses for compliance with the General Discharge Permit, as described above;
  - (b) A debit or credit entry equal to the incremental revenue requirement of each operationally in-service and closed to plant capital investment for compliance with the General Discharge Permit (including return on investment, income taxes, ad valorem tax, depreciation, and other taxes and fees), as described above.
  - (c) A monthly debit or credit entry equal to the average balance in each segment of the account multiplied by 1/12th of the most recent month's interest rate on Commercial Paper (prime, 90-day) published in the Federal Reserve Statistical Release H-15.
  
5. DISPOSITION:  

Requests for recovery of any balance in the Discharge MA are to be processed according to General Order 96-B or requested in a general rate case. Requests for recovery shall include a showing that the costs to be recovered were not included in rates.

( N )

(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No.       2155      

      PAUL G. TOWNSLEY      

Date Filed \_\_\_\_\_

Decision No.       -      

      Vice President      

Effective \_\_\_\_\_

Resolution No.       -



## Antelope Valley District

ADVICE LETTER FILING MAILING LIST  
PER SECTION 111 (G) OF GENERAL ORDER NO. 96-A

### Interested Parties

Peggy Fuller, Treasurer  
Leona Valley Town Council  
P.O. Box 795  
Leona Valley, CA 93551  
[pfuller@leonavalleytc.org](mailto:pfuller@leonavalleytc.org)

Jack L. Chacanaca  
Leona Valley Cherry Growers Association  
26201 Tuolumne St.  
Mojave, CA 93501

Joseph S. Lucido, President  
Leona Valley Cherry Growers Association  
26201 Tuolumne St  
Mojave, CA 93501

### Service Area Maps Only

Los Angeles LAFCO  
Executive Officer  
383 Hall of Administration  
Los Angeles, CA 90012

Fire Chief  
Los Angeles County  
500 W. Temple Street, Room 358  
Los Angeles, CA 90012

CDF, Battalion 11  
8723 Elizabeth Lake Road  
Leona Valley, CA 93550



## Bakersfield District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Competing and Adjacent Utilities:

City of Bakersfield  
1501 Truxtun Avenue  
Bakersfield, CA 93301501  
[jwstinson@bakersfieldcity.us](mailto:jwstinson@bakersfieldcity.us)

City of Bakersfield  
Water Resources Dept.  
1000 Buena Vista Rd.  
Bakersfield, CA 93311  
[mrandall@bakersfieldcity.us](mailto:mrandall@bakersfieldcity.us)

Casa Loma Water Company  
1016 Lomita Drive  
Bakersfield, CA 93307

East Niles Community Services District  
Manager: Timothy Ruiz  
P.O. Box 6038  
Bakersfield, CA 93386-6038  
Email: [truiz@eastnilescsd.org](mailto:truiz@eastnilescsd.org)

Victory Mutual Water Company  
P.O. Box 40035  
Bakersfield, CA 93304

Krista Mutual Water Company  
7025 Cuddy Valley Road  
Frazier Park, CA 93225

Oildale Mutual Water Company  
Attn: Manager Douglas Nunneley  
P.O. Box 5638  
Bakersfield, CA 93388  
Email: [dnunneley@yahoo.com](mailto:dnunneley@yahoo.com)

Stockdale Annex Mutual Water Company  
P.O. Box 9726  
Bakersfield, CA 93386-9726



## Bakersfield District

### Other Utilities and Interested Parties

#### Requesting Notification:

Kern County Water Agency  
Attn: Eric Averett  
P.O. Box 58  
Bakersfield, CA 93302

#### Service Maps

Kern County LAFCO  
Executive Officer  
5300 Lennox Avenue Ste.303  
Bakersfield, CA 93309  
Email: [KCLAFCO@bak.rr.com](mailto:KCLAFCO@bak.rr.com)

Kern County Fire Department  
Attn: Fire Chief  
1115 Truxtun Avenue  
Bakersfield, CA 93301

City of Bakersfield  
Attn: Fire Chief  
2101 H St.  
Bakersfield, CA 93301  
Email: [rfraze@bakersfieldfire.us](mailto:rfraze@bakersfieldfire.us)



## Bayshore District

### ADVICE LETTER FILING MAILING LIST PER SECTION III (G) OF GENERAL ORDER NO. 96-A

#### Municipalities and Governmental Agencies

City of San Carlos  
Attn: Linda Navarro  
600 Elm Street  
San Carlos, CA 94070  
Email: [rweil@cityofsancarlos.org](mailto:rweil@cityofsancarlos.org)

City of San Mateo, City Hall  
330 West 20th Ave.  
San Mateo, CA 94403  
Email: [vhansen@cityofsanmateo.org](mailto:vhansen@cityofsanmateo.org)

#### Adjacent Private and Public Utilities

Mid-Peninsula Water District  
Attn: Paul R. Regan  
P.O. Box 129  
Belmont, CA 94002

Justin Ezell  
Public Works Superintendent  
1400 Broadway  
Redwood City, CA 94063-2505  
Email: [jezell@redwoodcity.org](mailto:jezell@redwoodcity.org)

Ray Towne, Director of Public Works  
Foster City  
610 Foster City Blvd.  
Foster City, CA 94404  
Email: [rtowne@fostercity.org](mailto:rtowne@fostercity.org)

City of Burlingame  
501 Primrose Rd.  
Burlingame, CA 94010  
Email: [amorimoto@burlingame.org](mailto:amorimoto@burlingame.org)

Town of Hillsborough  
1600 Floribunda Ave.  
Hillsborough, CA 94010  
Email: [mdebry@hillsborough.net](mailto:mdebry@hillsborough.net)

City of South San Francisco  
400 Grand Avenue  
South San Francisco, CA 94080  
Attn: Barry Nagal

San Bruno Water Department  
567 El Camino Real  
San Bruno, CA 94066

Daly City DWWR  
Attn: Patrick Sweetland  
153 Lake Merced Blvd.  
Daly City, CA 94005  
Email: [psweetland@dalycity.org](mailto:psweetland@dalycity.org)

City of Brisbane  
Attn: Betsy Cooper  
50 Park Place  
Brisbane, CA 94005  
Email: [bcooper@ci.brisbane.ca.us](mailto:bcooper@ci.brisbane.ca.us)

Westborough Water District  
P.O. Box 2747  
South San Francisco, CA 94083



## Bayshore District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Other Interested Parties

Mr. John Gardner  
Tilden Engineering  
P.O. Box 897  
Menlo Park, CA 94026

### Service Area Maps Only

LAFCO (Local Agency Formation Commission)  
Executive Officer, San Mateo LAFCO  
County Government Center, Redwood City, CA 94063  
Email: [mpoyatos@co.sanmateo.ca.us](mailto:mpoyatos@co.sanmateo.ca.us)

Fire Department Servicing  
Affected Area



## Bear Gulch District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Menlo Park  
Attn: Carol Augustine  
701 Laurel Street  
Menlo Park, CA 94025  
Email: [ctaugustine@menlopark.org](mailto:ctaugustine@menlopark.org)

City of Menlo Park  
Attn: Lisa Ekers  
701 Laurel Street  
Menlo Park, CA 94025  
Email: [leakers@menlopark.org](mailto:leakers@menlopark.org)

City of Palo Alto  
Attn: Erik Keniston  
250 Hamilton Avenue  
Palo Alto, CA 94301  
Email: [eric.keniston@cityofpaloalto.org](mailto:eric.keniston@cityofpaloalto.org)

### Service Area Maps - only

Gail Sredanovic  
2161 Ashton Avenue  
Menlo Park, CA 94025

Town of Portola Valley  
Public Works Director  
765 Portola Rd.  
Portola Valley, CA 94028  
Email: [hyoung@portolavalley.net](mailto:hyoung@portolavalley.net)

LAFCO  
Executive Officer Ms. Martha Poyatos  
455 County Center, 2<sup>nd</sup> Floor  
Redwood City, CA 94063-1663

Town of Atherton  
Attn: Duncan Jones  
91 Ashfield Rd.  
Atherton, CA 94027  
Email: [djones@ci.atherton.ca.us](mailto:djones@ci.atherton.ca.us)

Fire Department Servicing Affected Area

Town of Woodside  
P.O. Box 620005  
Woodside, CA 94062

### Adjacent Private and Public Utilities

City of Menlo Park Water Dept.  
701 Laurel Street  
Menlo Park, CA 94025  
Email: [jpmcgirr@menlopark.org](mailto:jpmcgirr@menlopark.org)

Redwood City Water Department  
P.O. Box 391  
Redwood City, CA 94064

Los Trancos Water District  
1263 Los Trancos Road  
Portola Valley, CA 94025



## Chico District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Chico  
Attn: Frank Fields  
P.O. Box 3420  
Chico, CA 95927-3420  
Email: [ffields@ci.chico.ca.us](mailto:ffields@ci.chico.ca.us)

City of Chico  
Attn: Dave Burkland  
City Manager  
P.O. Box 3420  
Chico, Ca 95927  
[dburkland@ci.chico.ca.us](mailto:dburkland@ci.chico.ca.us)

City of Chico  
Attn: John Rucker  
Assistant City Manager  
P.O. Box 3420  
Chico, Ca 95927  
[jrucker@ci.chico.ca.us](mailto:jrucker@ci.chico.ca.us)

### Service Area Maps

Butte LAFCO  
1453 Downer Street, Suite C  
Oroville, CA 95965  
Email: [jstover@buttecounty.net](mailto:jstover@buttecounty.net)

(Service in Unincorporated Butte County)  
Butte County Fire Rescue  
Attn: Fire Chief  
176 Nelson Ave  
Oroville, CA 95965



## Coast Springs District

ADVICE LETTER FILING MAILING LIST  
Moratorium Service List

Joseph Farais  
1905 Adeline Street  
Oakland, CA 94607

Saint Antony's Monastery  
72 Bragdon Road  
Newberry Springs, CA 92365

Jochen Rueter  
662 Broadway  
Sonoma, CA 95476

Kirtus and Debra Doupnik  
11421 Mt. Vernon Rd.  
Auburn, CA 95603

Don Rinkor  
5314 Vista Grande Drive  
Santa Rosa, CA 95403

Jeff Libarle  
9100 Poplar Ave  
Cotati, CA 94931

Jeff Young  
473 Woodley Place  
Santa Rosa, CA 95409

Sauro Living Trust (William & Ronna  
Sauro)  
101 Red Cedar Drive, Unit 4  
Incline Village, NV 89451

Elwyn R. Richter  
12100 County Road 96  
Woodland, CA 95695

John Brekke  
7843 Hillmont Drive  
Oakland, CA 94605

Helen Lawson  
c/o Rebecca Potts  
5402 Arrowhead Court  
Livermore, CA 94550

Steve Jordan  
1600 Executive Ct  
Sacramento, CA 95864

Lawson Brothers  
PO Box 67  
Dillon Beach 94929

Erda LaBuhn  
519 Santa Barbara Rd.  
Berkeley, CA 94707

John & Cindy Stripe  
3433 Skylane  
Shingle Springs, CA 95682

Stephen & Margaret Simmons  
2499 Fifth Avenue  
Merced, CA 95340





## Coast Springs District

Oxfoot Associates  
24737 Arnold Dr.  
Sonoma, CA 94576

James & Peter Codding  
765 White Gates Ave.  
Healdsburg, CA 95448

Dana & Odette Christens  
418 Cross St.  
Woodland, CA 95695

Maureen Alessio  
1281 Fay Cir  
Sacramento, CA 95831

County of Marin  
3501 Civic Center Drive  
San Rafael, CA 94903

LH & KJ Lavine  
PO Box 247  
Dillon Beach, CA 94929

Steve & Akemi Bear  
5767 Dolores Drive  
Rohnert Park, CA 94928

Inam Maher  
1736 Tilling Way  
Stone Mountain, GA 30087

Richard & Betty Fisher  
519 Santa Barbara Road  
Berkeley, CA 94707

Kim Kocher  
1431 Sproul Ave.  
Napa, CA 94559

Mr. & Mrs Stone  
7995 Morningside Dr.  
Granite Bay, Ca 95746

Paul and Denise Jackson  
1888 Larkspur St  
Yountville, CA 94599-1232

Ken and Doris Roe  
3325 St. Moritz Ct.  
Redding, CA 96002

Robert and Susan Woodside  
28322 190<sup>th</sup> Avenue SE  
Kent, WA 98042

John Jungerman  
2422 Creekhollow Ln.  
Davis, CA 95616

Mark Farrar  
628 Marshall Ave.  
Pataluma, CA 94952

Armand and Patricia Camarena  
157 Amber Drive  
San Francisco, CA 94131

Jordan Management Company  
Attn: Denise Gilbert  
1600 Executive Court  
Sacramento, CA 95864

Mary C. Comyns, Trustee  
20 Elton Crt.  
Pleasant Hill, CA 94523

Gus Skarakis  
11335 Sutters Fort Way  
Gold River, CA 95670



## Dixon District

**ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A**

### Municipalities and Governmental Agencies

City of Dixon  
Attn: Finance Dept.  
600 East A Street  
Dixon, CA 95620  
*(Dixon finance department only wants notices of rate increases, not other filings)*

### Adjacent Private and Public Utilities

Solano Irrigation District  
Attn: General Manager  
508 Elmira Road  
Vacaville, CA 95687  
Email: [admin@sidwater.org](mailto:admin@sidwater.org)

Maine Prairie Water District  
P.O. Box 73  
Dixon, CA 95620

### Service Area Maps

LAFCO (Local Agency Formation Commission)  
Executive Officer  
Solano LAFCO  
675 Texas Street  
Fairfield, CA 94533

Fire Chief  
City of Dixon  
600 East A Street  
Dixon, CA 95620



## Dominguez District

ADVICE LETTER FILING MAILING LIST  
PER SECTION 111 (G) OF GENERAL ORDER NO. 96-A

### Adjacent Privately and Publicly Owned Utilities

City of Torrance Water Department  
Attn: Alan Berndt  
20500 Madrona Ave  
Torrance, CA 90630  
Email: [aberndt@torranceca.gov](mailto:aberndt@torranceca.gov)

City of Compton Municipal Water  
Department  
205 S. Willowbrook Avenue  
Compton, CA 90220

City of Los Angeles  
Department of Water and Power  
P.O. Box 51111, Room 956  
Los Angeles, CA 90051-0100  
Email: [Richard.west@ladwp.com](mailto:Richard.west@ladwp.com)

City of Long Beach Water Department  
1800 East Wardlow Road  
Long Beach, CA 90807

Golden State Water Company  
Attn: Regulatory Affairs  
630 East Foothill Blvd.  
San Dimas, CA 91733

Park Water Company  
P.O. Box 7002  
Downey, CA 90241-7002  
Email: [pwcadviceletterservice@parkwater.com](mailto:pwcadviceletterservice@parkwater.com)

### Service Area Maps

Los Angeles LAFCO  
Executive Officer  
383 Hall of Administration  
Los Angeles, Ca 90012

Fire Department Servicing Affected Area



## East Los Angeles District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Commerce  
Attn: Bob Zarrhi  
2535 Commerce Way  
Commerce, CA 90040

City of Montebello, Engineering Dept  
Attn: Roberta King,  
1600 W. Beverly Blvd.  
Montebello, CA 90640

City of Vernon  
4305 Santa Fe Ave.  
Vernon, CA 90058

City of Monterey Park  
Attn: Victor Meza  
Water Department  
320 W. Newmark Ave.  
Monterey Park, CA 91754

City of Los Angeles  
Dept. of Water & Power  
Attn: Richard West  
P.O. Box 51111, Room 956  
Los Angeles, CA 90051-0100  
Email: [richard.west@ladwp.com](mailto:richard.west@ladwp.com)

### Adjacent Private and Public Utilities

Park Water Company  
P.O. Box 7002  
Downey, CA 90241-7002  
Email: [pwcadviceletterservice@parkwater.com](mailto:pwcadviceletterservice@parkwater.com)

San Gabriel Valley Water Company  
Attn: Daniel A. Dell'Osa  
11142 Garvey Ave.  
El Monte, CA 91733  
Email: [dadellosa@sgvwater.com](mailto:dadellosa@sgvwater.com)

Montebello Land & Water Company  
Attn: Kenneth S. Bradbury  
344 E. Madison Avenue  
Montebello, CA 90640  
Email: [ken@mtblw.com](mailto:ken@mtblw.com)

South Montebello Irrigation District  
Attn: David Herrera  
864 W. Washington Blvd.  
Montebello, CA 90640

### Service Area Maps

Los Angeles LAFCO  
Executive Officer  
383 Hall of Administration  
Los Angeles, CA 90020

Los Angeles County Fire Dept.  
Attn: Alfie Blanch  
5847 Rickenbacker Rd.  
Commerce, CA 90040  
[ablanch@fire.lacounty.gov](mailto:ablanch@fire.lacounty.gov)

Fire Department Servicing Affected Area



## Grand Oaks District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Competing and Adjacent Utilities:

Golden Hills Community Services District  
Attn: Mr. Mike Sides Assistant General Manager  
P.O. Box 637  
Tehachapi, CA 93581  
Email: [msides\\_ghcsd@bak.rr.com](mailto:msides_ghcsd@bak.rr.com)

Mr. Dennis Wahlstrom, Public Works Director  
City of Tehachapi  
115 So. Robinson Street  
Tehachapi, CA 92561

### Service Area Maps only

Kern County LAFCO  
Executive Officer  
5300 Lennox Avenue  
Suite 303  
Bakersfield, CA 93309  
Email: [KCLAFCO@bak.rr.com](mailto:KCLAFCO@bak.rr.com)

Fire Chief  
City of Tehachapi  
115 So. Robinson Street  
Tehachapi, CA 92561



## Hermosa-Redondo District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Hermosa Beach  
1315 Valley Drive  
Hermosa Beach, CA 90254  
Email: [rmorgan@hermosabch.org](mailto:rmorgan@hermosabch.org)

City of Redondo Beach, Public Works Dept.  
Attn: Rob Osborne  
415 Diamond Street,  
Redondo Beach, CA 90277  
Email: [rob.osborne@redondo.org](mailto:rob.osborne@redondo.org)

City of Torrance, Dept. of Water  
Attn: Alan Berndt  
20500 Madrona Ave  
Torrance, CA 90630  
Email: [aberndt@torranceca.gov](mailto:aberndt@torranceca.gov)

### Adjacent Private and Public Utilities

City of Manhattan Beach  
Attn: Rob Erikson  
3621 Bell Avenue  
Manhattan Beach, CA 90266

City of Hawthorne  
4455 W. 126th St.  
Hawthorne, CA 90250

City of Los Angeles, Dept. of Water & Power  
Mr. Richard A. West, Rates Manager  
P.O. Box 51111, Room 956  
Los Angeles, CA 90051-0100  
Email: [richard.west@ladwp.com](mailto:richard.west@ladwp.com)

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

Park Billing Company  
Attn: Tina Davis and Vicky Miller  
P. O. Box 910  
Dixon, CA 95620  
Email: [vmiller@parkbilling.com](mailto:vmiller@parkbilling.com)  
Email: [tdavis@parkbilling.com](mailto:tdavis@parkbilling.com)

### Service Area Maps

Los Angeles LAFCO  
Executive Officer  
383 Hall of Administration  
Los Angeles, Ca 90012

Los Angeles County Fire Dept.  
Attn: Alfie Blanch  
5847 Rickenbacker Rd.  
Commerce, CA 90040  
[ablanch@fire.lacounty.gov](mailto:ablanch@fire.lacounty.gov)

Fire Department Servicing Affected Area



## Kern River Valley District

ADVICE LETTER FILING MAILING LIST

PER SECTION 111 (G) OF GENERAL ORDER NO. 96-A

### Interested Parties

Jim Davis  
8824 Cache  
Leona Valley, CA 93551

Rob Benson  
PO Box 1557  
Kernville, Ca 93238  
rcbenson@earthlink.net

Darlene Studdard  
Committee Member  
Residents Against Water Rates  
PO Box 3701  
Wofford Heights, Ca 93285-3701  
For: Residents Against Water Rates (Raw)

Jeremy Callihan  
Department of Water Resources  
Safe Drinking Water Program  
1416 Ninth Street, Rm. 816  
Sacramento, CA 95814

Linda Ng  
Department of Water Resources  
Safe Drinking Water Program  
1416 Ninth Street, Rm. 816  
Sacramento, CA 95814

### Service Area Map only

Kern County LAFCO  
Executive Officer  
5300 Lennox Avenue  
Suite 303  
Bakersfield, CA 93309  
Email: KCLAFCO@bak.rr.com



## King City District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

King City  
212 S. Vanderhurst Avenue  
King City, CA 93930  
Attn: Jim Larson, Finance Director

### Adjacent Private and Public Utilities

Little Bear Water Company  
51201 Pine Canyon Road, Space #125  
King City, CA 93930

Park Billing Company  
Attn: Tina Davis and Vicky Miller  
P. O. Box 910  
Dixon, CA 95620  
Email: [vmiller@parkbilling.com](mailto:vmiller@parkbilling.com)  
Email: [tdavis@parkbilling.com](mailto:tdavis@parkbilling.com)

### Service Area Maps Only

Kate McKenna, E.O.  
LAFCO of Monterey County  
Local Agency Formation Commission  
P O Box 1369, Salinas, CA 93902

Fire Chief  
King City  
212 S. Vanderhurst Avenue  
King City, CA 93930



## Livermore District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Livermore  
Utility Billing Division  
Attn: Erik Peterson  
1052 S. Livermore Ave.  
Livermore, CA 94550  
Email: [etpeterson@ci.livermore.ca.us](mailto:etpeterson@ci.livermore.ca.us)

Alameda County Flood Control  
& Water Conservation District  
Zone 7 Water Agency  
100 North Canyons Parkway  
Livermore, CA 94551

### Service Area Maps Only

Mona Palacios Executive Officer  
Alameda LAFCO  
1221 Oak Street Room 555  
Oakland, CA 94612  
Email: [mona.palacios@acgov.org](mailto:mona.palacios@acgov.org)

Fire Chief  
City of Livermore  
1052 S. Livermore Avenue  
Livermore, CA 94550



## Los Altos District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Cupertino  
Attn: Timm Borden  
10300 Torre Avenue  
Cupertino, CA 95014-3202

City of Los Altos  
Attn: Jim Gustafson  
1 North San Antonio Rd.  
Los Altos, CA 94022

Town of Los Altos Hills  
Attn: Carl Cahill  
26379 Fremont Road  
Los Altos Hills, CA 94022

### Adjacent Private and Public Utilities

San Jose Water Company  
Attn: Palle Jensen  
374 W. Santa Clara St.  
San Jose, CA 95196  
Email: [palle.jensen@sjwater.com](mailto:palle.jensen@sjwater.com)

Purissima Hills County Water District  
Attn: Patrick D. Walter  
26375 Fremont Rd.  
Los Altos, CA 94022  
Email: [pwalter@purissimawater.org](mailto:pwalter@purissimawater.org)

City of Mountain View, Water Dept.  
231 N. Whisman Rd.  
Mt. View, CA 94043  
Email: [will.medina@mountainview.gov](mailto:will.medina@mountainview.gov)

City of Sunnyvale, Water Dept.  
Attn: Val Conzet Water Operations Manager  
P.O. Box 3707  
Sunnyvale, CA 94088-3703  
Email: [vconzet@ci.sunnyvale.ca.us](mailto:vconzet@ci.sunnyvale.ca.us)  
[jperry@ci.sunnyvale.ca.us](mailto:jperry@ci.sunnyvale.ca.us)

City of Santa Clara, Water Dept.  
Attn: Alan Kurotori  
Water and Sewer Utilities  
1500 Warburton Ave.  
Santa Clara, CA 95050

City of Palo Alto, City Hall  
Attn: Catherine Cox  
250 Hamilton Ave.  
Palo Alto, CA 94301  
Email: [catherine.cox@cityofpaloalto.org](mailto:catherine.cox@cityofpaloalto.org)

### Other Parties Requesting Notification

Great Oaks Water Company  
15 Great Oaks Blvd. #100  
San Jose, CA 95119  
Email: [bloehr@greatoakswater.com](mailto:bloehr@greatoakswater.com)

Santa Clara Valley Water District  
5750 Almaden Expressway  
San Jose, CA 95118  
Email: [dtaylor@valleywater.org](mailto:dtaylor@valleywater.org)

### Service Area Maps Only

LAFCO of Santa Clara County  
Neelima Palacherla, Executive Director  
70 W. Hedding St. 11<sup>th</sup> Floor  
San Jose, CA 95110  
Email: [neelima.palacherla@ceo.sccgov.org](mailto:neelima.palacherla@ceo.sccgov.org)

Fire Department Serving Affected Area



## Marysville District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Marysville  
Attn: Dixon Coulter  
P.O. Box 150  
Marysville, CA 95901  
Email: [dcoulter@marysville.ca.us](mailto:dcoulter@marysville.ca.us)

### Adjacent Private and Public Utilities

City of Yuba City  
Utilities Director  
302 Burns Drive  
Yuba City, CA 95991

Olivehurst Public Utility District  
Attn: Gary Plasterer  
P.O. Box 670  
Olivehurst, CA 95961

Linda County Water District  
Attn: Dave Gothrow, Mgr.  
1280 Scales  
Marysville, CA 95901

### Service Area Maps only

Yuba County LAFCO  
915 8<sup>th</sup> Street, Suite 107  
Marysville, CA 95901

CDF – Northern Region Chief  
P.O. Box 944246  
Sacramento, CA 94244-2460

Fire Department Serving Affected Area



## Mid-Peninsula District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of San Carlos  
Attn: Linda Navarro  
600 Elm Street  
San Carlos, CA 94070  
Email: [rweil@cityofsancarlos.org](mailto:rweil@cityofsancarlos.org)

City of San Mateo, City Hall  
330 West 20th Ave.  
San Mateo, CA 94403  
Email: [vhansen@cityofsanmateo.org](mailto:vhansen@cityofsanmateo.org)

### Adjacent Private and Public Utilities

Mid-Peninsula Water District  
Attn: Paul R. Regan  
P.O. Box 129  
Belmont, CA 94002

Justin Ezell  
Public Works Superintendent  
1400 Broadway  
Redwood City, CA 94063-2505  
Email: [jezell@redwoodcity.org](mailto:jezell@redwoodcity.org)

Ray Towne, Director of Public Works  
Foster City  
610 Foster City Blvd.  
Foster City, CA 94404  
Email: [rtowne@fostercity.org](mailto:rtowne@fostercity.org)

City of Burlingame  
501 Primrose Rd.  
Burlingame, CA 94010  
Email: [amorimoto@burlingame.org](mailto:amorimoto@burlingame.org)

Town of Hillsborough  
1600 Floribunda Ave.  
Hillsborough, CA 94010  
Email: [mdebry@hillsborough.net](mailto:mdebry@hillsborough.net)

Mr. John Gardner  
Tilden Engineering  
P.O. Box 897  
Menlo Park, CA 94026

### Other Interested Parties

### Service Area Maps

Executive Officer  
San Mateo LAFCO  
County Government Center  
Redwood City, CA 94063  
Email: [mpoyatos@co.sanmateo.ca.us](mailto:mpoyatos@co.sanmateo.ca.us)



## Oroville District

ADVICE LETTER FILING MAILING LIST  
PER SECITON III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Oroville  
Attn: Diane MacMillian  
1735 Montgomery Street  
Oroville, CA 95965

### Adjacent Private and Public Utilities

Thermalito Irrigation District  
Attn: Jayme Boucher  
410 Grand Ave.  
Oroville, CA 95965  
Email: [jboucher@twsd.info](mailto:jboucher@twsd.info)

South Feather Water & Power  
Attn: Mike Glaze  
2310 Oroville Quincy Hwy.  
Oroville, CA 95966  
Email: [glaze@southfeather.com](mailto:glaze@southfeather.com)

### Service Area Maps Only

Butte County LAFCO  
1453 Downer St. Ste. C  
Oroville, CA 95965  
Email: [jstover@buttecounty.net](mailto:jstover@buttecounty.net)

Fire Chief  
City of Oroville  
1735 Montgomery Street  
Oroville, CA 95965



## Palos Verdes District

ADVICE LETTER FILING MAILING LIST  
PER SECITON III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Lomita  
Attn: Woody Thurlow  
P.O. Box 339  
Lomita, CA 90717

City of Palos Verdes Estates  
Attn: Judy Smith  
340 Palos Verdes Drive West  
Palos Verdes Estates, CA 90274  
Email: [cityclerk@pvestates.org](mailto:cityclerk@pvestates.org)

City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275  
Email: [publicworks@rpv.com](mailto:publicworks@rpv.com)

City of Rolling Hills  
No. 2 Portuguese Bend Road  
Rolling Hills, CA 90274  
Email: [hluce@cityofrh.net](mailto:hluce@cityofrh.net)

City of Rolling Hills Estates  
Attn: Mike Whitehead  
4045 Palos Verdes Drive North  
Rolling Hills Estates, CA 90274

### Adjacent Private and Public Utilities

City of Torrance, Water Dept.  
Attn: Alan Berndt  
20500 Madrona Ave  
Torrance, CA 90630  
Email: [aberndt@torranceca.gov](mailto:aberndt@torranceca.gov)

Mr. Richard A. West, Rates Manager  
City of Los Angeles, Dept. of Water & Power  
P.O. Box 51111  
Los Angeles, CA 90051-0100  
Email: [richard.west@ladwp.com](mailto:richard.west@ladwp.com)

### Service Area Maps

Los Angeles LAFCO  
Executive Officer  
383 Hall of Administration  
Los Angeles, CA 90012

Los Angeles County Fire Dept.  
Attn: Alfie Blanch  
5847 Rickenbacker Rd.  
Commerce, CA 90040  
[ablanch@fire.lacounty.gov](mailto:ablanch@fire.lacounty.gov)

Fire Department Servicing Affected Area



## Redwood Valley District

### ADVICE LETTER FILING MAILING LIST PER SECTION III (G) OF GENERAL ORDER NO. 96-A

Jeffrey Young  
473 Woodley Place  
Santa Rosa, CA 95409  
Email: [jffyng@gmail.com](mailto:jffyng@gmail.com)

Marcos Pareas  
P. O. Box 152  
Dillon Beach, CA 94929  
Email: [mapreas@gmail.com](mailto:mapreas@gmail.com)

County of Marin  
Director of Public Works  
P. O. Box 4186  
San Rafael, CA 94913-4186

County of Lake  
Special Districts  
230 North Main  
Lakeport, CA 95453

Joshua Ziese  
California Department of Public Health  
P.O. Box 997377, MS 7418  
1616 Capital Ave.  
Sacramento, CA 95899

Lance Reese  
California Department of Public Health  
P.O. Box 997377, MS 7418  
1616 Capital Ave.  
Sacramento, CA 95899

#### Service Area Maps only

County of Marin LAFCO  
3501 Civic Center Drive  
San Rafael, CA 94903

Fire Department Serving Affected Area



## Salinas District

### ADVICE LETTER MAILING LIST PER SECTION III (G) OF GENERAL ORDER NO. 96-A

#### Municipalities and Governmental Agencies

City of Salinas  
City Engineer  
200 Lincoln Avenue  
Salinas, CA 93901

City of Salinas  
City Attorney  
200 Lincoln Avenue  
Salinas, CA 93901  
Email: [vanessav@ci.salinas.ca.us](mailto:vanessav@ci.salinas.ca.us)  
Email: [chrisc@ci.salinas.ca.us](mailto:chrisc@ci.salinas.ca.us)

#### Adjacent Private and Public Utilities

Park Billing Company  
Attn: Tina Davis and Vicky Miller  
P.O. Box 910  
Dixon, CA 95620  
Email: [vmiller@parkbilling.com](mailto:vmiller@parkbilling.com)  
Email: [tdavis@parkbilling.com](mailto:tdavis@parkbilling.com)

Gavilan Water Company  
644 San Juan Grade Road  
Salinas, CA 93906

Alco Water Service  
Attn: Tom Adcock  
249 Williams Road  
Salinas, CA 93905

Monterey County Administration  
855 East Laurel Drive, Bldg C  
Salinas, CA 93905

#### Service Area Maps

Executive Officer  
LAFCO of Monterey County  
P.O. Box 1369  
Salinas, CA 93902

Fire Chief  
City of Salinas  
200 Lincoln Avenue  
Salinas, CA 93901





## Selma District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Selma, City Hall  
1710 Tucker Street  
Selma, CA 93662  
Email: [DBH@CityofSelma.com](mailto:DBH@CityofSelma.com)

### Adjacent Private and Public Utilities

City of Fowler  
Attn: D. Weisser  
128 S. 5th Street  
Fowler, CA 93625  
Email: [DWeisser@ci.fowler.ca.us](mailto:DWeisser@ci.fowler.ca.us)

### Other Parties Request Notification

City of Fresno, Dept. of Public Works  
2600 Fresno Street  
Fresno, CA 93721-3624

### Service Area Maps only

LAFCO (Local Agency Formation Commission)  
Attn: Executive Officer  
2115 Kern St. Ste.310  
Fresno, CA 93721  
Email: [jewitte@co.fresno.ca.us](mailto:jewitte@co.fresno.ca.us)

Fire Chief  
City of Selma  
1710 Tucker Street  
Selma, CA 93662



## South San Francisco District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of South San Francisco  
400 Grand Avenue  
South San Francisco, CA 94080  
Attn: Barry Nagel

### Adjacent Private and Public Utilities

San Bruno Water Dept.  
567 El Camino Real  
San Bruno, CA 94066

Daly City DWW  
Attn: Patrick Sweetland  
153 Lake Merced Blvd.  
Daly City, CA 94015  
Email: [psweetland@dalycity.org](mailto:psweetland@dalycity.org)

City of Brisbane  
Attn: Betsy Cooper  
50 Park Place  
Brisbane, CA 94005  
Email: [bcooper@ci.brisbane.ca.us](mailto:bcooper@ci.brisbane.ca.us)

Westborough Water District  
P.O. Box 2747  
South San Francisco, CA 94083

### Service Area Maps Only

LAFCO (Local Agency Formation Commission)  
Executive Officer, San Mateo LAFCO  
County Government Center, Redwood City, CA 94063  
Email: [mpoyatos@co.sanmateo.ca.us](mailto:mpoyatos@co.sanmateo.ca.us)

Fire Department Servicing  
Affected Area



## Stockton District

ADVISE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Stockton  
Attn: Sara Cortes  
425 N. El Dorado St.  
Stockton, CA 95202

San Joaquin County Board of Supervisors  
44 N. San Joaquin St. Ste. 627  
Stockton, CA 95202  
Email: [lsahyoun@sjgov.org](mailto:lsahyoun@sjgov.org)

### Adjacent Private and Public Utilities

City of Stockton Municipal Utility Dept.  
2500 Navy Drive  
Stockton, CA 95206

Director of Public Works, County of San Joaquin  
1810 East Hazelton Ave.  
Stockton, CA 95205  
Email: [vaguilar@sjgov.org](mailto:vaguilar@sjgov.org)

Stockton-East Water District  
6767 East Main Street  
Stockton, CA 95215  
Email: [sewd@sewd.net](mailto:sewd@sewd.net)

### Other Parties Requesting Notification

Heinz, USA  
Attn: Tom McMurty  
P.O. Box 57  
Stockton CA 95201

Commanding Officer (Code 136)  
Naval Facilities Engineering Com.  
Re: Cont. #N68711-74-M-7250-P00999  
Cont. #N68711-75-C-5006-P00999  
1220 Pacific Highway  
San Diego CA 92132

### Service Area Maps

San Joaquin LAFCO  
509 W. Weber Ave. Ste 420  
Stockton, CA 95203

City of Stockton  
Fire Chief  
425 North El Dorado St.  
Stockton, CA 95202

Park Billing Company  
Attn: Tina Davis and Vicky Miller  
P. O. Box 910  
Dixon, CA 95620  
Email: [vmiller@parkbilling.com](mailto:vmiller@parkbilling.com)  
Email: [tdavis@parkbilling.com](mailto:tdavis@parkbilling.com)

Pearl West  
3731 Portsmouth Circle North  
Stockton, CA 95219



## Visalia District

ADVISE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Visalia  
c/o Dooley, Herr, Carlson & Peltzer  
100 Willow Plaza, Suite 300  
Visalia, CA 93291  
Attn: Kenneth Richardson  
559-636-5600 Fax 559-636-9759  
559-636-5601 Email: [kenr@dhlaw.net](mailto:kenr@dhlaw.net)

Osa Wolff  
[wolff@smwlaw.com](mailto:wolff@smwlaw.com)

### Adjacent Private and Public Utilities

Bedel Water Company  
Attn: Glen Lublin  
2536 E. College Ave  
Visalia, CA 93292  
559-713-0794

### Service Area Maps

Tulare County Resource Management Agency  
LAFCO  
Executive Officer  
5961 S. Mooney Blvd.  
Visalia, CA 93277  
559-733-6291 Fax 559-730-2653

Fire Chief  
City of Visalia  
707 West Acequia Street  
Visalia, CA 93291



## Westlake District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Thousand Oaks  
Attn: Jay Spurgin, Deputy Public Works Director  
2100 Thousand Oaks Blvd.  
Thousand Oaks, CA 91362-2903

### Adjacent Private and Public Utilities

City of Los Angeles, Dept. of Water & Power  
Mr. Richard A. West, Rates Manager  
P.O. Box 51111, Room 956  
Los Angeles, CA 90051-0100  
Email: [Richard.west@ladwp.com](mailto:Richard.west@ladwp.com)

California-American Water Company  
4701 Beloit Drive  
Sacramento, CA 95838-2434  
Email: [ca.rates@amwater.com](mailto:ca.rates@amwater.com)

Ventura Regional Sanitation District  
Attn: Linda Moyer  
1001 Partridge Dr., Suite 150  
Ventura, CA 93003

Las Virgenes Municipal Water District  
Attn: Carol Palma  
4232 Las Virgenes Road  
Calabasas, CA 91302

### Service Area Maps

Fire Department Servicing Affected Area  
Ventura LAFCO  
Executive Officer  
800 S. Victoria Avenue  
Ventura, CA 93009-1850  
Email: [kim.uhlich@ventura.org](mailto:kim.uhlich@ventura.org)



## Willows District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

### Municipalities and Governmental Agencies

City of Willows  
Civic Center  
201 N. Lassen Street  
Willows, CA 95988

### Service Area Maps Only

Christy Leighton, Executive Officer  
County of Glenn Local Agency Formation Commission  
125 South Murdock  
Willows, California 95988

Fire Chief  
City of Willows  
201 North Lassen Street  
Willows, CA 95988  
Email: [wpeabody@cityofwillows.org](mailto:wpeabody@cityofwillows.org)