



July 15, 2016

Advice Letter No. 2226

To the California Public Utilities Commission:

California Water Service Company (“Cal Water”) respectfully submits this Tier 3 advice letter hereby transmits for filing the following changes in its tariff schedules applicable to all districts, including Grand Oaks.

New/Revised C.P.U.C.		Cancelling C.P.U.C.	
Sheet No.	Title of Sheet	Schedule No.	Sheet No.
xxxxx-W	Schedule AS, Page 3	Schedule No. AS	xxxxx-W
xxxxx-W	Table of Contents, Page 1		xxxxx-W
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Summary

This advice letter requests authority to amortize expenses from 2014-2015 tracked in the Drought Memorandum Account (“DRMA”) in the amount of \$4,243,266. Cal Water requests approval to apply a quantity-based surcharge of \$0.0315 per CCF on customers in its 23 Class A ratemaking areas as well as in Grand Oaks.

Background

- January 17, 2014 – Governor of State of California declared State of Emergency in California due to severe drought conditions
- April 1, 2014 – In Advice Letter 2124, Cal Water requested authority to add Preliminary Statement AL, titled “Drought Memorandum Account (“DRMA”)” to its tariff to track incremental costs related to implementing the requirements of Rule 14 and Schedule 14.1. The Commission approved AL 2124 on April 28, 2014, with an effective date of May 1, 2014.
- April 25, 2014 – Governor of State of California issued an Executive Order to strengthen the State’s ability to manage water and habitat effectively in drought conditions, and call on all Californians to redouble their efforts to conserve water.
- May 5, 2015 – the SWRCB issued an Emergency Regulation due to continuing drought conditions with specific water use reductions, by service area, and prohibitions on how



end-use customers can use potable water to achieve a statewide 25% reduction in usage as compared with the amount used in 2013 (through February 2016).

- June 1, 2015 – Through Tariff Schedule 14.1, Cal Water implemented individual customer water budgets, with drought surcharges applied to overages, and individual water banking.
- November 13, 2015 – Governor of the State of California issued another Executive Order that directed the Water Board to, if drought conditions persist through January 2016, extend until October 31, 2016 restrictions to achieve a statewide reduction in potable usage.
- On February 2, 2016 – Water Board adopted an extended and revised Emergency Regulation due to continuing drought conditions.
- May 18, 2016 – Water Board approved updated Emergency Regulation that extends emergency regulation through January 2017 with specific modifications, the most significant of these being the creation of a self-certification process for all utilities to identify required reductions based on supply need for a 3 year period.
- July 15, 2016 – In Advice Letter 2225, Cal Water requested elimination of Drought Surcharges throughout its regulated areas beginning July 29, 2016.

Discussion

Building on its existing focus on conservation, Cal Water began creating a drought response approach in 2014 that took a “customer-first” approach to the drought with the goal of meeting state mandates while strengthening relationships with customers and communities. Effective May 1, 2014, the Drought Memorandum Account was created to track all expenses related to the drought as Cal Water began drought specific conservation outreach in line with the declared State of Emergency.

From 2014 to 2015, Cal Water spent roughly \$5.7M in an effort to meet the statewide 25% water reduction target.¹ These costs included ongoing drought communications and advertising (with increased focus in districts not meeting target in 2015), programming/system work to address the addition of water budgets and surcharges due to the drought on customer bills/online, implementation of a drought specific call center, and payroll/benefits needs associated for additional full time and temporary employees to address drought response.

The focus throughout the drought response initiative has been on working with our customers to meet the water reduction targets by district. This included marketing our multiple conservation programs (conservation kits, rebates, water evaluation programs, turf replacement, bathroom fixture replacement, and high efficiency toilet programs), creating a Drought Call Center to address customer questions and handle appeals to water budgets and surcharges, and creating drought

¹ Of this amount, and as discussed below, Cal Water has identified incremental drought-related costs that are appropriate for recovery through the DRMA, and is requesting a recovery amount for this period that is lower than \$5.7 million.



conservation coordinators to work with districts on conservation efforts, as well as ensure compliance to waste of water violations.

Cal Water has seen much success from the programs efforts. Through the initial emergency drought regulation period (June 2015 – Feb 2016) Cal Water saved 74,000 Acre Feet of water, accounting for 6% of total water saved statewide. In addition, Cal Water achieved a cumulative water reduction of 26.8% for the same period. In terms of conservation during the initial emergency regulation period, Cal Water served 7,596 conservation kits to customers, provided 3,327 rebates, completed 738 turf replacement applications, completed 1,473 water usage evaluations, completed 4,003 bathroom replacements, and delivered 9,276 high efficiency toilets.

Drought Call Center activities – The Drought Call Center was opened in May 2015 in Cal Water’s East Los Angeles District to handle drought-specific customer service inquiries. While employees throughout the company address any general drought and conservation questions, the customer service representatives in the Drought Call Center answer more in-depth questions related to the drought and process any changes to water budgets (via appeals) and Waste of Water violations. Customer service areas directed to the Drought Call Center include:

- a. Any changes to water budgets through appeals process
- b. All appeal questions and requests
- c. Application or removal of Waste of Water penalties
- d. Detailed drought customer service calls

Incremental Drought Expenses

Cal Water requests recovery for drought expenses for 2014-2015 in the amount of \$4,243,266. On Attachment A to this advice letter, this sum is broken down into payroll charges, the benefits associated with payroll charges, and non-payroll charges. The workpapers for this advice letter provide details on how Cal Water determined that these costs are incremental to rates, and appropriately recovered through the DRMA.

Payroll Costs

The recoverable payroll costs consist of costs associated with employees dedicated to drought activities (“drought-specific employees”), and the costs associated with other drought activities performed by other employees.

Incremental Drought Employee Costs – Experienced customer service representatives (“CSRs”) from various district offices were chosen to staff the Drought Call Center. Their old positions were then backfilled, usually with temporary employees. Cal Water developed the following methodology to calculate the payroll and benefits costs associated with the drought that are incremental to rates. Cal Water looked at the current costs of having CSRs temporarily transferred to new drought positions, and compared them to the costs incurred prior to the drought for those same CSRs, as shown in the formula below. Current drought costs are defined to include the temporary labor brought on to fill the CSRs’ old positions.



$$\begin{aligned} & [\text{COSTS OF NEW DROUGHT POSITIONS}] + [\text{TEMPORARY LABOR FILLING OLD POSITIONS}] \\ & \text{MINUS} \\ & [\text{COSTS OF OLD POSITIONS}] \\ & = \text{INCREMENTAL PAYROLL-RELATED DROUGHT COSTS} \end{aligned}$$

Incremental Drought Activities by Other Employees: Expenses resulting from non-drought specific employees include, but are not limited to, activities such as overtime to fix emergency leaks (which would not require overtime coverage in a non-drought situation); districts working with customers on appeals or drought-specific issues, waste of water violations, and functional teams providing drought specific coverage in regards to communications, public meetings, drought call center creation and staffing, IT programming, etc.

Non-Payroll Costs

Cal Water has identified \$2,493,475 in recoverable drought expenses unrelated to payroll. See Attachment B to this advice letter for details regarding the nature of those costs.

With regard to Project Buildout Costs, these are significant IT expenses were incurred in order to program Cal Water's billing system to accommodate district-specific drought surcharges and customer-specific water banking. The value of this programming is not transferable to any of Cal Water's other regulated activities, so Cal Water proposes to expense these capital costs.

If amortization of these non-payroll costs is granted, Cal Water will remove them from the averages used to calculate rates in its general rate cases.

Future DRMA Amortization

Cal Water does not propose closing the DRMA. There are capital costs tracked in the DRMA for which Cal Water is not seeking recovery at this time. The costs relate to the construction of the Drought Call Center in Cal Water's East Los Angeles District. Cal Water has been winding down Call Center activities, and will be closing down the Call Center in the beginning of August 2016. The appropriate recovery of those costs is best evaluated after the Call Center is closed. In addition, Cal Water has continued to incur expenses in 2016. These will be addressed in a subsequent advice letter.

Authorization

Cal Water files this request as a Tier 3 advice letter pursuant to General Order 96-B, Water Industry Rule 7.3.3(7), which addresses requests for the amortization of memo accounts.

Requested Effective Date



CALIFORNIA WATER SERVICE COMPANY

Advice Letter 2226, 2014-15 Drought Expense Amortization

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Cal Water requests an effective date of **August 14, 2016** to amortize expenses tracked in the DRMA for 2014-2015.

Notice

Customer Notice: Notice of this request will be provided via legal notice consistent with General Order 96-B, General Rule 4.2 and Water Industry Rule 3.1.

Service List: In accordance with General Order 96-B, General Rules 4.3 and 7.2, and Water Industry Rule 4.1, a copy of this advice letter will be mailed or electronically transmitted on **July 15, 2016** to competing and adjacent utilities and other utilities or interested parties having requested such notification.

Response or Protest

Anyone may respond to or protest this advice letter. 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 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 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 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 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, 3rd floor
California Public Utilities Commission,
505 Van Ness Avenue, San Francisco, CA 94102
water_division@cpuc.ca.gov



CALIFORNIA WATER SERVICE COMPANY

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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 Cal Water at the following address:

Darin Duncan
California Water Service Company
1720 North First Street,
San Jose, California 95112
Fax 408/367-8430 or
E-mail dduncan@calwater.com

Cities and counties requiring 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 a late-filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

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

/s/

Natalie Wales
Regulatory Counsel

cc: Ting-Pong Yuen, ORA

Attachment A

	Adopted Meter Usage (Ccf.)	Adopted Flat Usage (Ccf.)	Surcharge per ccf for 2016	Flat Rate Surcharge
Total	125,792,984	9,063,995		
Antelope Valley				
Leona	79,264		\$ 0.0315	
Lancaster	188,229		\$ 0.0315	
Fremont & LH	21,727		\$ 0.0315	
Bayshore	9,701,446		\$ 0.0315	
Bear Gulch	5,279,654		\$ 0.0315	
Bakersfield	19,112,250	8,892,569	\$ 0.0315	\$ 1.2392
Chico	8,575,249		\$ 0.0315	
Dixon	479,439		\$ 0.0315	
Dominguez	16,759,200		\$ 0.0315	
East Los Angeles	6,574,316		\$ 0.0315	
Hermosa Redondo	4,981,567		\$ 0.0315	
Kern River Valley	358,178		\$ 0.0315	
King City	158,692		\$ 0.0315	
Livermore	3,745,713		\$ 0.0315	
Los Altos	5,061,700		\$ 0.0315	
Marysville	676,622	171,426	\$ 0.0315	\$ 0.5416
Oroville	859,670		\$ 0.0315	
Palos Verdes	7,751,543		\$ 0.0315	
Redwood Valley				
Coast Springs	7,566		\$ 0.0315	
Lucerne	96,524		\$ 0.0315	
Unified	32,252		\$ 0.0315	
Selma	1,733,154		\$ 0.0315	
Salinas	6,639,300		\$ 0.0315	
Stockton	10,001,360		\$ 0.0315	
Visalia	13,396,353		\$ 0.0315	
Willows	508,583		\$ 0.0315	
Westlake	3,013,434		\$ 0.0315	
DRMA Surcharge per CCF			\$ 0.0315	

Total DRMA Charges to amortize

\$ 4,243,266

Flat Districts:	GRC Adopted # of Services	GRC Adopted CCF	GRC Adopted Ccf/Flat Service	Current Adopted # of Flat Services	Current Adopted CCF	Flat Surcharge for Flat Customers
Bakersfield	22,111	10,449,572	472.6	18,816	8,892,569	\$ 14.8705 \$ 279,804
Chico	2,460	930,546	378.3	-	-	
Marysville	1,240	256,106	206.5	830	171,426	\$ 6.4987 \$ 5,394
Willows	44	13,118	298.1	-	-	
						\$ 285,198

DRMA Charges:	Actual	Requested for Recovery
Payroll Charges	\$ 1,431,208	\$ 1,318,202
Benefits	\$ 468,588	\$ 431,589
Non-payroll Charges	\$ 3,114,219	\$ 2,493,475
Total	\$ 5,014,015	\$ 4,243,266

Attachment B - DRMA Summary

Category	2014	2015	Total	Recovery Requested	Excluded from DRMA	Category Includes:
Admin & General Exp		\$64,906	\$64,906	\$64,906	\$0	Equipment for Drought Call Center, cleaning services, training, conservation raffle, misc.
One-time Project Build-out		\$934,736	\$934,736	\$783,060	\$151,676	Includes Drought system programming for surcharges, water budgets in customer billing system (CC&B); website load capabilities; payroll and benefits for employees on Capital Projects (IT/CS Drought programming). Cost included as expense due to one-time nature of project - cannot be re-used in the future.
Chemical & Filter Material		\$34,635	\$34,635	\$34,635	\$0	Call Center Construction Fees
Company Dues		\$400	\$400	\$400	\$0	Job Posting for Government Relations Associate (Drought)
Conferences		\$285	\$285	\$285	\$0	Drought Related Conference
Conservation Expense	\$15,477	\$6,693	\$22,170	\$22,121	\$19	Drought Advertising and Design, conservation expenses.
Customer Records-Equip Maint		\$960	\$960	\$960	\$0	Furniture installation for Conservation Coordinator
Customer Records-Software	\$8,750		\$8,750	\$8,750	\$0	Software needs for Drought
Customer Records-Supplies		\$177,338	\$177,338	\$162,875	\$6,443	Office supplies and drought mailers.
Employees Dues		\$702	\$702	\$702	\$0	Services requested for Drought
Gen Office Building Expense		\$2,090	\$2,090	\$1,599	\$0	Carpet Cleaning, travel for drought.
General Corporate Expense		\$7,912	\$7,912	\$7,067	\$0	New phone lines, drought advertising and design
Institutional Advertising	\$269,105	\$630,742	\$899,847	\$899,847	\$0	Drought Advertising
Jobbing Accounts	\$1,542		\$1,542	\$0	\$1,542	Resource to work on Drought Initiatives (included in incremental labor analysis)
Materials & Supplies		\$55	\$55	\$55	\$0	Equipment/Supplies for Drought Call Center
Misc Expense		\$6,901	\$6,901	\$6,901	\$0	Equipment/Supplies for Drought Call Center
Miscellaneous Expense		\$2,790	\$2,790	\$2,790	\$0	Equipment/Supplies for Drought Call Center
Miscellaneous General Expense		\$2,700	\$2,700	\$2,579	\$0	Equipment/Supplies for Drought Call Center
Office Salaries	\$11,535	\$47,204	\$58,739	\$0	\$58,739	All Labor included in Labor Analysis File
Office Supplies		\$28,501	\$28,501	\$28,462	\$40	Supplies, equipment and Stock photos for Drought
Office Supply & Expense		\$305	\$305	\$305	\$0	Furniture for Gov & Relations Associate
Other Outside Services	\$50,340	\$337,096	\$387,436	\$374,172	\$13,264	Consulting services for drought, training expenses, and drought advertising
Other Stationary & Printing		\$13,566	\$13,566	\$13,566	\$0	Drought Advertising
Payroll & Benefits		\$2,703,648	\$2,703,648	\$1,899,796	\$803,852	Drought specific Labor recoverable using incremental expense approach (see labor analysis file); Non drought specific labor performing drought specific tasks.
Postage	\$82,804	\$207,105	\$289,909	\$289,909	\$0	Postage for Drought Mailings
Regulatory Commission Expense		\$27,250	\$27,250	\$27,250	\$0	Public Notice Filings and Postage
Stationery & Printng	\$22,916	\$174,135	\$197,051	\$197,051	\$0	Printing material for Drought
Telephone & Telegraph		\$2,428	\$2,428	\$940	\$1,488	Increased availability of phone service due to drought
Telephone-General		\$7,521	\$7,521	\$7,521	\$0	Telephone equipment for Conservation
Temporary Labor		\$21,145	\$21,145	\$21,145	\$0	Office Labor
Training & Seminars		\$2,239	\$2,239	\$2,239	\$0	Training for Drought team (Conservation Coordinators and Director)
Trans & Distribution Mains		\$14,228	\$14,228	\$14,228	\$0	Emergency Leak Repair - increased service due to the drought
Transportation Clrg		\$782	\$782	\$602	\$180	Fuel reimbursement
Travel -Miscellaneous		\$117,154	\$117,154	\$117,154	\$0	Travel expenses for CSRs and Drought specific employees.
Travel-Meals		\$24,094	\$24,094	\$23,937	\$156	Meals for CSRs and Drought related employees
Travel-Meals at Headquarters		\$2,091	\$2,091	\$2,091	\$0	Meals for CSRs and Drought related employees
Wages - Conservation		\$0	\$0	\$0	\$0	
Wages - NR Customer Account		\$0	\$0	\$0	\$0	
Wages-Collection Maintenance		\$0	\$0	\$0	\$0	
Total	\$462,469	\$5,604,335	\$6,066,804	\$5,019,900	\$1,037,397	
(Less Hawthorne)				\$5,885		
GRAND TOTAL				\$5,014,015		

CALIFORNIA WATER SERVICE COMPANY
1720 North First Street, San Jose, CA 95112
(408) 367-8200

Appendix 1
Tariff Sheet Changes in Advice Letter 2226

<u>Rate Schedule</u>	<u>New CPUC Sheet No.</u>	<u></u>	<u>Cancelling CPUC Sheet No.</u>
TofC Pg. 1	XXXXX-W	Table of Contents Page 1	XXXXX-W
TofC Pg. 2	XXXXX-W	Table of Contents Page 2	XXXXX-W
AS	XXXXX-W	Additional Surcharges/Surcredits Page 3	XXXXX-W

Table of Contents Page 1

The following listed tariff sheets contain all effective rates and rules affecting the rates and service of the Utility together with information relating thereto:

<u>Sheet Subject Matter</u>	<u>CPUC Sheet No.</u>
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Preliminary Statement B-D	610-W
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Preliminary Statement M	Page 1 9345-W
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Preliminary Statement M	BK 10374-W
Preliminary Statement M	BAY XXXXX-W
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Preliminary Statement M	HR 10408-W
Preliminary Statement M	KRV 10602-W
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Preliminary Statement M	OR 10482-W
Preliminary Statement M	PV 10598-W
Preliminary Statement M	RV-CS 10597-W
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Preliminary Statement M	VS 10395-W
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Preliminary Statement X	8314-W
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(continued)

(To be inserted by utility)
 Advice Letter No. 2226
 Decision No. _____

Issued by
 PAUL G. TOWNSLEY
 Name
 Vice President
 TITLE

(To be inserted by CPUC)
 Date Filed _____
 Effective _____
 Resolution No. _____

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<u>Sheet Subject Matter</u>	<u>Service Area</u>	<u>Schedule No.</u>	<u>CPUC Sheet No.</u>
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Preliminary Statement AO			10448-W
Preliminary Statement AP			10449-W
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Preliminary Statement AR			10447-W
 <u>Rate Schedules:</u>			
ALL DISTRICTS			
Service to Company Employees		ED-1	5168-W
Surcharge to Fund Public Utilities Commission Reimbursement Fee		UF	6827-W
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Low Income Ratepayer Assistance		LIRA	10370-W
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Schedule 14.1 - Staged Mand. Reductions and Drought Surcharges		14.1 Page 15	XXXXX-W (P)
 ANTELOPE VALLEY DISTRICT			
Residential Metered Service	Leona Valley	AV-LEO-1-R	10719-W
Nonresidential Metered Service	Leona Valley	AV-LEO-1-NR	10718-W
Residential Metered Service	Lancaster	AV-LAN-1-R	10717-W
Nonresidential Metered Service	Lancaster	AV-LAN-1-NR	10716-W
General Metered Service	Fremont Valley/Lake Hugh	AV-FM-1	10715-W
Limited Residential Flat Rate Service	Lake Hughes	AV-LH-2R	2550-W
Private Fire Protection Service		AV-4	10266-W
 BAKERSFIELD DISTRICT			
Residential Metered Service		BK-1-R	XXXXX-W
Nonresidential Metered Service		BK-1-NR	XXXXX-W
Residential Flat Rate Service		BK-2R	XXXXX-W
Private Fire Protection Service		BK-4	1070-W
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 BAYSHORE DISTRICT			
Residential Metered Service - South San Francisco Service Area		BAY-1-R	XXXXX-W
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(To be inserted by utility)
 Advice Letter No. 2226
 Decision No. _____

Issued by
PAUL G. TOWNSLEY
 Name
Vice President
 Title

(To be inserted by CPUC)
 Date Filed _____
 Effective _____
 Resolution No. _____

Schedule No. AS
ADDITIONAL SURCHARGES/SURCREDITS

Page 3

2. True-Up Surcharges and Credits for Interim Rates

Due to the delay in adopting the final rates approved in Decision 14-08-011, the Commission authorized interim rates from January 1, 2014 through August 28, 2014. The surcharges below reflect the difference between the interim rates on customers' bills since January 1, 2014, and the recently-approved final rates that were scheduled to become effective on January 1, 2014. In addition, LIRA and RSF customers will receive the credits below to cover the difference between the credits customers have been receiving since January 1, 2014, and the recently-approved credits that were scheduled to become effective on January 1, 2014. These surcharges and credits will be included in the line item called "Other Surcharges and Credits" on customers' bills.

- Column A - Identifies the surcharges per 100 cubic feet that will be applied to the bills of all metered customers.
- Column B - Identifies the fixed monthly surcharges that will be applied to the bills of flat-rate customers.
- Column C - Identifies the fixed monthly credits that will be applied to the bills of customers who qualify for the Low-Income Ratepayer Assistance (LIRA) program.
- Column D - Identifies the fixed monthly credits that will be applied to the bills of customers in the districts that are in the Rate Support Fund (RSF) program.

The duration of these surcharges and credits will be 24 months or 36 months beginning September 30, 2014 (see below).

District	A	B	C	D
	Metered Surcharge (per CCF; monthly)	Flat Surcharge (monthly)	LIRA Surcredit (monthly)	RSF Surcredit (monthly)
For 36 months: September 30, 2014 – September 29, 2017				
Antelope Valley - Lancaster	\$ 0.3403		\$ 1.36	
Antelope Valley - Leona Valley	\$ 0.7623		\$ 3.13	\$ 0.33
Chico	\$ 0.0818	\$ 2.53	\$ 0.01	
Dixon	\$ 0.3418		\$ 0.24	
Kern River Valley	\$ 0.7554		\$ 4.07	\$ 0.49
King City	\$ 0.1546			
Oroville	\$ 0.1365	\$ 4.09	\$ 0.75	
Redwood Valley - Coast Springs	\$ 2.8642		\$ 4.35	\$ 3.03
Redwood Valley - Lucerne	\$ 1.4426		\$ 2.92	\$ 4.41
Redwood Valley - Unified	\$ 1.5562		\$ 3.91	\$ 7.83
For 24 months: September 30, 2014 – September 29, 2016				
Bakersfield	\$ 0.0891	\$ 3.45	\$ 0.20	
Hermosa Redondo	\$ 0.1846		\$ 0.42	
Marysville	\$ 0.1028	\$ 1.77		
Salinas	\$ 0.1421			
Selma	\$ 0.0923	\$ 2.67	\$ 0.02	
Stockton	\$ 0.1197		\$ 0.40	
Visalia	\$ 0.0816			
Westlake	\$ 0.2013		\$ 1.06	
Willows	\$ 0.1905	\$ 4.73	\$ 2.00	

3. Recovery for Drought Expenses

The following surcharges will be applied to all regulated customers, including Grand Oaks, in order to recover expenses incurred in 2014-2015 for drought activities.

All Metered Customers	\$ 0.0315	per CCF
Flat-rate Bakersfield customers	\$ 14.87	per month
Flat-rate Marysville customers	\$ 6.50	per month

(N)
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|
|
|
(N)

(To be inserted by utility)

Issued by

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

Advice Letter No. 2226

PAUL G. TOWNSLEY

Date Filed _____

NAME

Decision No. _____

Vice President

Effective _____

TITLE

Resolution No. -



Antelope Valley District

ADVICE LETTER FILING MAILING LIST

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

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Bakersfield District

ADVICE LETTER FILING MAILING LIST

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

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Bayshore District

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

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Bear Gulch District

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

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Chico District

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

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Dixon District

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

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Dominguez District

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



East Los Angeles District

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

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ADVICE LETTER FILING MAILING LIST

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

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ADVICE LETTER FILING MAILING LIST

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

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

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Livermore District

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

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

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

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

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

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

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

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Selma District

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



Stockton District

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

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

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

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

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Grand Oaks District

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

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