

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 16, 2025

Natalie Wales  
Director, Regulatory Policy & Compliance  
California Water Service Co.  
1720 North First Street  
San Jose, CA 95112

Dear Ms. Wales,

The Water Division of the California Public Utilities Commission has approved California Water Service Company's Advice Letter No. 2565, filed on September 3, 2025, regarding 2024 M-WRAM balance amortization.

Enclosed are copies of the following revised tariff sheets, effective October 1, 2025, for the utility's files:

<b>P.U.C. Sheet</b>	
<b>No.</b>	<b>Title of Sheet</b>
13948-W	Schedule No. AS, Additional Surcharges/Surcredits, Page 5
13949-W	Table of Contents, Page 6
13950-W	Table of Contents, Page 1

Please contact Van Harting at [VH4@cpuc.ca.gov](mailto:VH4@cpuc.ca.gov), if you have any questions.

Thank you.

Enclosures





September 3, 2025

**Advice Letter No. 2565**

To the California Public Utilities Commission:

California Water Service Company (Cal Water) respectfully submits this Tier 1 advice letter requesting authority to make the changes in its tariff as described below.

New/Revised CPUC Sheet No.	Title of Sheet	Schedule No.	Cancelling CPUC Sheet No.
	Additional Surcharges/Surcredits		
XXXXX-W	Page 5	XXXXX-W	13602-W
XXXXX-W	Table of Contents Page 6	TOC 6	XXXXX-W
XXXXX-W	Table of Contents Page 1	TOC 1	XXXXX-W

**Summary**

This advice letter is submitted pursuant to Preliminary Statement BG for the Monterey-Style Water Revenue Adjustment Mechanism Balancing Account (“M-WRAM”), authorized by Decision (“D.”) 24-03-042, resolving Cal Water’s 2021 General Rate Case (“2021 GRC”). The M-WRAM only applies to residential customers billed on a tiered rate structure and does not apply to flat rate service customers or non-residential service customers. Accordingly, Cal Water requests M-WRAM amortization for the following areas: Bay Area Region, Bakersfield, Bear Gulch, Dixon, East Los Angeles, Livermore, Los Altos, Los Angeles County Region, Marysville, North Valley Region, Salinas Valley Region, Selma, South Bay Region, Stockton, Visalia, Westlake, and Willows.<sup>1</sup>

Cal Water is requesting an effective date of **October 1, 2025** for the M-WRAM surcharges proposed in this Tier 1 filing.

**Background**

On February 29, 2008, the Commission issued D.08-02-036, Opinion Resolving Phase 1A Settlement Agreements and Contested Issues in its investigation into conservation policy objectives for Class A water utilities. Among other things, D.08-02-036 approved a settlement agreement authorizing Cal Water to establish full decoupling through a Water Revenue Adjustment Mechanism (“WRAM”) and Modified Cost Balancing Account (“MCBA”).<sup>2</sup>

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<sup>1</sup> These are all of Cal Water’s Class A ratemaking areas that have tiered quantity rates, and therefore exclude both the Kern River Valley District and the Travis District.

<sup>2</sup> D.08-02-036, Ordering Paragraph No. 1.



On September 3, 2020, the Commission issued D.20-08-047, prohibiting Cal Water (among other Class A water utilities) from proposing to continue its WRAM and MCBA in its next GRC, but allowing the utility to propose the use of the Monterey-style WRAM (“M-WRAM”) and Incremental Cost Balancing Accounts (“ICBA”).<sup>3</sup>

On March 15, 2024, the Commission issued D.24-03-042, which in part granted Cal Water’s request to utilize an M-WRAM in accordance with D.20-08-047.<sup>4</sup>

Advice letter 2532 authorized surcharges for the 2023 balances for all Class A ratemaking areas except Kern River Valley and Travis. The 2023 M-WRAM surcharge will continue for ratemaking areas that had a longer than 12-month amortization recovery period.

**Discussion**

In this advice letter, Cal Water proposes to amortize the amounts recorded in the M-WRAM for calendar year 2024, consistent with the provisions of Preliminary Statement BG, as shown in the table below. Cal Water is authorized to accrue interest on this balance based on the 90-day commercial paper rate, and to continue to earn interest on the uncollected balance. The amount used to determine the surcharge calculation includes: 1) the net balance at the end of calendar year 2024, 2) interest on the 2024 net balance through July 2025, and 3) compounded interest accrued over the duration of the 2023 M-WRAM amortization recorded from October 2024 through July 2025.

The M-WRAM tracks the difference between quantity revenues collected under each residential rate tier and the quantity revenues that would have been collected under a single quantity rate at the equivalent level of sales. The single quantity rates used to calculate the M-WRAM were approved in previously filed advice letters that were effective in 2024.

<b>Ratemaking Area</b>	<b>M-WRAM Balance</b>	<b>Surcharge Duration (mos.)</b>	<b>Surcharge (\$/ccf)</b>
Bakersfield	\$1,050,103	12	\$0.0754
Bay Area Region (Bayshore, Redwood Valley)	\$3,759,453	24	\$0.4521
Bear Gulch	\$414,059	12	\$0.1036
Dixon	\$184,536	12	\$0.5374
East Los Angeles	\$632,549	12	\$0.2451
Livermore	\$677,514	12	\$0.2733
Los Altos	\$1,899,506	12	\$0.5898
Los Angeles County Region - Antelope Valley	\$71,154	18	\$0.2991
Los Angeles County Region - Palos Verdes	\$ 2,420,039	18	\$0.3083
Marysville	\$81,912	12	\$0.2014

<sup>3</sup> D.20-08-047, Ordering Paragraph No. 3.

<sup>4</sup> D.24-03-042 at pp. 108-112.



Rate-making Area	M-WRAM Balance	Surcharge Duration (mos.)	Surcharge (\$/ccf)
North Valley Region (Chico, Oroville)	\$1,169,946	12	\$0.2282
Salinas Valley Region (Salinas, King City)	\$434,251	12	\$0.1419
Selma	\$82,129	12	\$0.0802
South Bay Region (Dominguez, Hermosa Redondo)	\$2,476,072	12	\$0.4509
Stockton	\$1,713,826	12	\$0.3706
Visalia	\$614,003	12	\$0.0764
Westlake	\$845,276	12	\$0.4850
Willows	\$124,749	12	\$0.4379

Calculation of M-WRAM Surcharges: Recovery of under-collected revenues tracked in the M-WRAM occurs via a quantity surcharge. To calculate the surcharge, the M-WRAM amortization balance for each rate-making area is divided by the 2025 adopted residential sales forecast for that area, resulting in a dollars-per-centum cubic feet (\$/CCF) surcharge.

Amortization Periods: Guidance on recovery periods is provided in Standard Practice U-27-W.<sup>5</sup> Under that guidance, the amortization period for all areas would be 12 months because their M-WRAM balances are less than 5% of the last authorized revenue requirement.

To reduce residential customer bill impacts, Cal Water is voluntarily proposing an extended 18-month recovery period in the Los Angeles County Region and 24-month recovery period in the Bay Area Region.

**Requested Effective Date**

Pursuant to General Order 96-B, Water Industry Rule 7.3.1, this advice is submitted with a Tier 1 designation. This advice letter can be considered “effective pending disposition” by the Commission staff’s determination that the filing complies with the standard practice and that the surcharge calculations are correct. Cal Water requests that the attached tariffs be considered effective on **October 1, 2025**.

**Notice**

Customer Notice – Pursuant to General Order 96-B, General Rule 7.3.1, no customer notice of Tier 1 advice letters is required.

Service List: In accordance with General Order 96-B, General Rule 4.3 and 7.2 and Water Industry Rule 4.1, a copy of this advice letter will be transmitted **electronically** on **September 3, 2025** to competing and adjacent utilities and other utilities or interested parties having requested such notification. **Please note that this advice letter is only being distributed electronically.**

<sup>5</sup> Standard Practice U-27-W, Paragraph 64.b.



## **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. 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 that such a protest may not be made where it would require relitigating a prior order of the Commission.)

A protest shall provide citations or proofs where available to allow staff to properly consider the protest. A response or protest must be made in writing or by electronic mail and must be received by the Water Division within 20 days of the date this advice letter is filed. The advice letter process does not provide for any responses, protests or comments, except for the utility's reply, after the 20-day comment period. The address for mailing or delivering a protest is:

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

On the same date the response or protest is submitted to the Water Division, the respondent or protestant shall send a copy by mail (or e-mail) to us, addressed to:

Natalie Wales  
California Water Service Company  
1720 North First Street,  
San Jose, California 95112  
[cwsrates@calwater.com](mailto:cwsrates@calwater.com)

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division, within the 20-day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.



**CALIFORNIA WATER SERVICE COMPANY**

Advice Letter 2565, Amortization of 2024 M-WRAM Balance

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**Replies**

The utility shall reply to each protest and may reply to any response. Each reply must be received by the Water Division 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/\_\_\_\_\_  
\_\_\_\_\_

Karlee Kaylor  
Rates Analyst

cc: Syreeta Gibbs (Public Advocates Office)

[PublicAdvocatesWater@cpuc.ca.gov](mailto:PublicAdvocatesWater@cpuc.ca.gov)

**Schedule No. AS**  
**Additional Surcharges/Surcredits**

**4. M-WRAM Surcharges and Surcredits**

The purpose of the Monterey-Style Water Revenue Adjustment Mechanism (M-WRAM) is to track the difference between actual quantity revenues collected from residential customers who have a tiered rate structure, and the quantity revenues that would have been collected if a single quantity rate (i.e., a uniform rate) had been in effect in that area. This comparison is done by multiplying the actual amount of water used by the uniform rate authorized by the Commission.

Because there was an under-collection of revenues tracked in the M-WRAM Balancing Account in calendar years 2023 and 2024, a surcharge is applied to each 100 cubic feet (CCF) of water used by residential metered customers in those areas that had tiered quantity rates as shown below.

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Ratemaking Area	2023 Balance			2024 Balance		
	Surcharge (\$/ccf)	Effective Dates		Surcharge (\$/ccf)	Effective Dates	
Bakersfield	\$0.0484	10/01/2024 – 09/30/2026		\$0.0754	10/01/2025 – 09/30/2026	(N)
Bay Area Region	\$0.3346	10/01/2024 – 09/30/2026		\$0.4521	10/01/2025 – <b>09/30/2027</b>	(N)
Bear Gulch			(D)	\$0.1036	10/01/2025 – 09/30/2026	(N)
Dixon	\$0.2734	10/01/2024 – 09/30/2026		\$0.5374	10/01/2025 – 09/30/2026	(N)
East Los Angeles			(D)	\$0.2451	10/01/2025 – 09/30/2026	(N)
Livermore			(D)	\$0.2733	10/01/2025 – 09/30/2026	(N)
Los Altos			(D)	\$0.5898	10/01/2025 – 09/30/2026	(N)
Los Angeles County Region - Antelope Valley	\$0.4675	10/01/2024 – 09/30/2026		\$0.2991	10/01/2025 – <b>03/31/2027</b>	(N)
Los Angeles County Region - Palos Verdes	\$0.1981	10/01/2024 – 09/30/2026		\$0.3083	10/01/2025 – <b>03/31/2027</b>	(N)
Marysville			(D)	\$0.2014	10/01/2025 – 09/30/2026	(N)
North Valley Region (Chico, Oroville)	\$0.1195	10/01/2024 – 09/30/2026		\$0.2282	10/01/2025 – 09/30/2026	(N)
Salinas Valley Region	\$0.0645	10/01/2024 – 09/30/2026		\$0.1419	10/01/2025 – 09/30/2026	(N)
Selma			(D)	\$0.0802	10/01/2025 – 09/30/2026	(N)
South Bay Region (Dominguez, Hermosa Redondo)	\$0.2025	10/01/2024 – 09/30/2026		\$0.4509	10/01/2025 – 09/30/2026	(N)
Stockton			(D)	\$0.3706	10/01/2025 – 09/30/2026	(N)
Visalia			(D)	\$0.0764	10/01/2025 – 09/30/2026	(N)
Westlake	\$0.2476	10/01/2024 – 09/30/2026		\$0.4850	10/01/2025 – 09/30/2026	(N)
Willows	\$0.2262	10/01/2024 – 09/30/2026		\$0.4379	10/01/2025 – 09/30/2026	(N)

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(To be inserted by utility)	Issued By	(To be inserted by CPUC)
Advice Letter <u>2565</u>	<u>Greg Milleman</u>	Date Filed <u>09/03/2025</u>
Decision	<u>Vice President</u>	Effective <u>10/01/2025</u>
	<u>Rates and Regulatory Affairs</u>	Resolution _____

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(To be inserted by utility)  
 Advice Letter 2565  
 Decision

Issued By  
Greg Milleman  
Vice President  
Rates and Regulatory Affairs

(To be inserted by CPUC)  
 Date Filed 09/03/2025  
 Effective 10/01/2025  
 Resolution

**CALIFORNIA WATER SERVICE COMPANY**

1720 North First Street  
 San Jose, CA 95112  
 (408) 367-8200

Revised  
 Cancelling

Cal. P.U.C. Sheet No. 13950-W  
 Cal. P.U.C. Sheet No. 13947-W

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

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(To be inserted by utility)  
 Advice Letter 2565  
 Decision

Issued By  
Greg Milleman  
Vice President  
Rates and Regulatory Affairs

(To be inserted by CPUC)  
 Date Filed 09/03/2025  
 Effective 10/01/2025  
 Resolution \_\_\_\_\_



## Antelope Valley District (Los Angeles County Region)

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

JACK L. CHACANACA  
**Leona Valley Cherry Growers  
Association**  
26201 Tuolumne St  
Mojave, CA 93501

JOSEPH S. LUCIDO  
**Leona Valley Cherry Growers  
Association**  
26201 Tuolumne St  
Mojave, CA 93501

PEGGY FULLER  
**Leona Valley Town Council**  
P.O. Box 795  
Leona Valley, CA 93551  
[pfuller@leonavalleytc.org](mailto:pfuller@leonavalleytc.org)

GABE NEVAREZ, PUBLIC WORKS  
MANAGER  
**City of Lancaster**  
615 West Avenue H  
Lancaster, CA 93534  
[gnevarez@cityoflancasterca.org](mailto:gnevarez@cityoflancasterca.org)

KIKI CARLSON, REGULATORY AFFAIRS  
MANAGER  
**Suburban Water Systems**  
1325 N. Grand Avenue, Suite 100  
Covina, CA 91724  
[kcarlson@swwc.com](mailto:kcarlson@swwc.com)

CHRISTIAN HORVATH, CITY CLERK  
**City of Rolling Hills**  
2 Portuguese Bend Road  
Rolling Hills CA 90274  
[chorvath@cityofrh.net](mailto:chorvath@cityofrh.net)

### ONLY FOR SERVICE AREA MAPS:

PAUL N. NOVAK, EXECUTIVE OFFICER  
**Los Angeles LAFCO**  
80 South Lake Avenue, Suite 870  
Pasadena, CA 91101  
[pnovak@lalafco.org](mailto:pnovak@lalafco.org)

BLAIR KNOX, EXECUTIVE OFFICER  
**Kern County LAFCO**  
5300 Lennox Avenue Suite 303  
Bakersfield, CA 93309  
[eo@kernlafco.org](mailto:eo@kernlafco.org)

ANTHONY C. MARONE, FIRE CHIEF  
**Los Angeles County**  
500 W Temple St, room 358  
Los Angeles, CA 90012

**CDF, Battalion 11**  
8723 Elizabeth Lake Rd  
Leona Valley, CA 93350



## Bakersfield District

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

DOUGLAS NUNNELEY  
**Oildale Mutual Water Company**  
P.O. Box 5368  
Bakersfield, CA 93388  
[dnunneley@oildalewater.com](mailto:dnunneley@oildalewater.com)

**Casa Loma Water Company**  
250 W. Spruce Ave., Suite 101  
Clovis, CA 93611  
[casalomawater@gmail.com](mailto:casalomawater@gmail.com)

TIMOTHY RUIZ  
**East Niles Community Services District**  
P.O. Box 6038  
Bakersfield, CA 93386  
[truiz@eastnilescsd.org](mailto:truiz@eastnilescsd.org)

CITY MANAGER'S OFFICE  
**City of Bakersfield**  
1600 Truxtun Avenue  
Bakersfield, CA 93301  
[admmgr@bakersfieldcity.us](mailto:admmgr@bakersfieldcity.us)

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

COLIN L. PEARCE  
JOLIE-ANNE S. ANSLEY  
ALEXANDRA B. JONES  
**Duane Morris LLP**  
One Market Plaza, Spear Tower,  
Suite 2200  
San Francisco, Ca 94105-1127  
[cpearce@duanemorris.com](mailto:cpearce@duanemorris.com)  
[jsansley@duanemorris.com](mailto:jsansley@duanemorris.com)  
[BAJones@duanemorris.com](mailto:BAJones@duanemorris.com)

DANIEL MALDONADO, WATER  
RESOURCES DEPARTMENT  
**City of Bakersfield**  
1000 Buena Vista Rd  
Bakersfield, CA 93311  
[drmaldonado@bakersfieldcity.us](mailto:drmaldonado@bakersfieldcity.us)

MATTHEW COLLOM DCA, CITY  
ATTORNEY'S OFFICE  
**City of Bakersfield**  
1600 Truxtun Ave, 4th Floor  
Bakersfield, CA 93301  
[mcollom@bakersfieldcity.us](mailto:mcollom@bakersfieldcity.us)

### **ONLY FOR SERVICE AREA MAPS:**

BLAIR KNOX, EXECUTIVE OFFICER  
**Kern County LAFCO**  
5300 Lennox Avenue Suite 303  
Bakersfield, CA 93309  
[eo@kernlafco.org](mailto:eo@kernlafco.org)

JOHN FRANDO, FIRE CHIEF  
**City of Bakersfield**  
2101 H St  
Bakersfield, CA 93301  
[jfrando@bakersfieldfire.us](mailto:jfrando@bakersfieldfire.us)

FIRE CHIEF  
**Kern County Fire Department**  
1115 Truxtun Ave  
Bakersfield, CA 93301



## Bayshore District (Bay Area Region)

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

KEVIN OKADA, ASSISTANT DIRECTOR OF  
PUBLIC WORKS  
**City of Burlingame**  
501 Primrose Rd  
Burlingame, CA 94010  
[kokada@burlingame.org](mailto:kokada@burlingame.org)

DARRYL BARROW, GENERAL MANAGER  
**Westborough Water District**  
P.O. Box 2747  
South San Francisco, CA 94083  
[dbarrow@westboroughwater.com](mailto:dbarrow@westboroughwater.com)

ANDREW BROZYNA, PUBLIC WORKS  
DIRECTOR, CITY ENGINEER  
**Foster City City Hall**  
610 Foster City Blvd  
Foster City, CA 94404  
[abrozyna@fostercity.org](mailto:abrozyna@fostercity.org)  
[zdanish@fostercity.org](mailto:zdanish@fostercity.org)  
[glarios@fostercity.org](mailto:glarios@fostercity.org)

DENNIS BOCH, DEPUTY DIRECTOR OF  
MAINTENANCE & OPERATIONS  
**San Bruno Water Department**  
567 El Camino Real  
San Bruno, CA 94066  
[dbosch@sanbruno.ca.gov](mailto:dbosch@sanbruno.ca.gov)

MATT LEE, PUBLIC SERVICES DIRECTOR  
**San Bruno Water Department**  
567 El Camino Real  
San Bruno, CA 94066  
[mlee@sanbruno.ca.gov](mailto:mlee@sanbruno.ca.gov)

JUSTIN CHAPEL, WATER UTILITIES  
SUPERINTENDENT  
**City of Redwood City**  
1400 Broadway  
Redwood City, CA 94063  
[jchapel@redwoodcity.org](mailto:jchapel@redwoodcity.org)

LOU DURAN, PUBLIC WORKS  
SUPERINTENDENT  
**City of San Carlos**  
600 Elm St  
San Carlos, CA 94070  
[lduran@cityofsancarlos.org](mailto:lduran@cityofsancarlos.org)

SHARON RANALS, CITY MANAGER  
**City of South San Francisco**  
400 Grand Ave  
South San Francisco, CA 94080  
[Sharon.Ranals@ssf.net](mailto:Sharon.Ranals@ssf.net)

JOSHUA COSGROVE DIRECTOR  
**City of Daly City Department of Water  
& Wastewater Resources**  
NSMCO Sanitation District  
153 Lake Merced Blvd  
Daly City CA 94015  
[jcosgrove@dalycity.org](mailto:jcosgrove@dalycity.org)

PAUL WILLIS, PUBLIC WORKS DIRECTOR,  
CITY ENGINEER  
**Town of Hillsborough**  
1600 Floribunda Ave  
Hillsborough, CA 94010  
[pwillis@hillsborough.net](mailto:pwillis@hillsborough.net)

PUBLIC WORKS DIRECTOR  
**City of San Mateo**  
330 West 20th Ave  
San Mateo, CA 94403  
[publicworks@cityofsanmateo.org](mailto:publicworks@cityofsanmateo.org)

RENE RAMIREZ, INTERIM GENERAL  
MANAGER  
**Mid Peninsula Water District**  
P.O. Box 129  
Belmont, CA 94002  
[rramirez@midpeninsulawater.org](mailto:rramirez@midpeninsulawater.org)



## **Bayshore District (Bay Area Region)**

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

KAT WUELFING, ASST. GENERAL  
MANAGER

**Mid Peninsula Water District**

P.O. Box 129

Belmont, CA 94002

[kwuefing@midpeninsulawater.org](mailto:kwuefing@midpeninsulawater.org)

TONY BRENNER, WATER DIVISION  
SUPERVISOR

**Town of Hillsborough**

1600 Floribunda Ave

Hillsborough, CA 94010

[tbrenner@hillsborough.net](mailto:tbrenner@hillsborough.net)

RACHEL JONES

**Cox Castle & Nicholson LLP**

50 California Street, Suite 3200

San Francisco, CA 94111

[rjones@coxcastle.com](mailto:rjones@coxcastle.com)

**ONLY FOR SERVICE AREA MAPS:**

ROB BARTOLI, EXECUTIVE OFFICER

**San Mateo LAFCO**

455 Country Center, 2<sup>nd</sup> Floor

Redwood City, CA 94063

[rbartoli@smcgov.org](mailto:rbartoli@smcgov.org)



## Bear Gulch District

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

SINDHI MEKALA, DEPUTY TOWN  
ENGINEER

**Town of Woodside**  
P.O.Box 620005  
Woodside, CA 94062  
[smekala@woodsideca.gov](mailto:smekala@woodsideca.gov)

ROBERT OVADIA  
**Town of Atherton**  
91 Ashfield Rd  
Atherton, CA 94027  
[rovadia@ci.atherton.ca.us](mailto:rovadia@ci.atherton.ca.us)

JOE LOCOCO, DEPUTY DIRECTOR OF  
ROADS DIVISION  
**Los Trancos Water District**  
1263 Los Trancos Rd  
Portola Valley, CA 94025  
[jlococo@smcgov.org](mailto:jlococo@smcgov.org)

JASON LEDBETTER, TOWN MANAGER  
**Town of Woodside**  
P.O.Box 620005  
Woodside, CA 94062  
[jledbetter@woodsidetown.org](mailto:jledbetter@woodsidetown.org)

PUBLIC WORKS DIRECTOR  
**Town of Portola Valley**  
765 Portola Rd  
Portola Valley, CA 94028  
[hyoung@portolavalley.net](mailto:hyoung@portolavalley.net)

WATER DEPARTMENT  
**City of Menlo Park**  
701 Laurel St  
Menlo Park, CA 94025  
[pwdirector@menlopark.gov](mailto:pwdirector@menlopark.gov)  
[water@menlopark.gov](mailto:water@menlopark.gov)

WATER DEPARTMENT  
**Redwood City**  
P.O.Box 391  
Redwood City, CA 94064  
[revenueservices@redwoodcity.org](mailto:revenueservices@redwoodcity.org)

### ONLY FOR SERVICE AREA MAPS:

ROB BARTOLI, EXECUTIVE OFFICER  
**San Mateo LAFCO**  
455 Country Center, 2<sup>nd</sup> Floor  
Redwood City, CA 94063  
[rbartoli@smcgov.org](mailto:rbartoli@smcgov.org)

**GAIL SREDANOVIC**  
2161 Ashton Ave  
Menlo Park, CA 94025



## Chico District (North Valley Region)

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

JENNIFER MACARTHY, DEPUTY CITY  
MANAGER

**City of Chico**

P.O.Box 3420

Chico, CA 95927

[Jennifer.macarthy@chicoca.gov](mailto:Jennifer.macarthy@chicoca.gov)

SCOTT DOWELL

**City of Chico**

P.O.Box 3420

Chico, CA 95927

[scott.dowell@chicoca.gov](mailto:scott.dowell@chicoca.gov)

MARK SORENSON, CITY MANAGER

**City of Chico**

P.O. Box 3420

Chico, CA 95927

[Mark.Sorensen@chicoca.gov](mailto:Mark.Sorensen@chicoca.gov)

BARBARA MARTIN, ADMINISTRATIVE  
SERVICES DIRECTOR

**City of Chico**

P.O. Box 3420

Chico, CA 95927

[Barbara.martin@chicoca.gov](mailto:Barbara.martin@chicoca.gov)

**ONLY FOR SERVICE AREA MAPS:**

STEPHEN LUCAS, EXECUTIVE OFFICER

**Butte County LAFCO**

1453 Downer St, Suite C

Oroville, CA 95965

[slucas@buttecounty.net](mailto:slucas@buttecounty.net)

GARRETT SJOLUND, FIRE CHIEF

**Butte County Fire Rescue**

176 Nelson Ave

Oroville, CA 95965



## Dixon District

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

FINANCE DEPARTMENT

**City of Dixon**

600 East A St

Dixon, CA 95620

[utility.billing@cityofdixon.us](mailto:utility.billing@cityofdixon.us)

CARY KEATEN, GENERAL MANAGER

**Solano Irrigation District**

508 Elmira Rd

Vacaville, CA 95687

[ckeaten@sidwater.org](mailto:ckeaten@sidwater.org)

**ONLY FOR SERVICE AREA MAPS:**

RICH SEITHEL, EXECUTIVE OFFICER

**Solano County LAFCO**

601 Texas Street, 2nd Floor

Fairfield, CA 94533

[rseithel@solanolafco.com](mailto:rseithel@solanolafco.com)

TODD MCNEAL, FIRE CHIEF

**City of Dixon**

600 East A St

Dixon, CA 95620

[tmcneal@cityofdixon.us](mailto:tmcneal@cityofdixon.us)



## Dominguez District (South Bay Region)

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

ANDY DARLAK  
**City of Torrance Public Works**  
20500 Madrona Ave  
Torrance, CA 90630  
[adarlak@torranceca.gov](mailto:adarlak@torranceca.gov)

AUDREY JACKSON, REGULATORY  
AFFAIRS  
**Golden State Water Company**  
630 East Foothill Blvd  
San Dimas, CA 91733  
[afjackson@gswater.com](mailto:afjackson@gswater.com)

GEORGE CHEN, RATES MANAGER  
**City of Los Angeles, Department of  
Water & Power**  
P.O. Box 51111 Room 956  
Los Angeles, CA 90051  
[ZhengGeorge.Chen@ladwp.com](mailto:ZhengGeorge.Chen@ladwp.com)

GLADYS ESTRADA, REGULATORY  
AFFAIRS  
**Golden State Water Company**  
630 East Foothill Blvd.  
San Dimas, CA 91773  
[GROSENDO@gswater.com](mailto:GROSENDO@gswater.com)

MICHAEL HARVEY, OPERATIONS  
MANAGER  
**City of Compton Water Utility Division**  
205 S Willowbrook Ave  
Compton, CA 90220  
[mharvey@comptonciry.org](mailto:mharvey@comptonciry.org)

PAUL FUJITA, WATER DEPARTMENT  
**City of Long Beach**  
1800 East Wardlow Rd  
Long Beach, CA 90807  
[paul.fujita@lbwater.org](mailto:paul.fujita@lbwater.org)

RONALD MOORE, REGULATORY  
AFFAIRS  
**Golden State Water Company**  
630 East Foothill I Blvd  
San Dimas, CA 91733  
[rkmoore@gswater.com](mailto:rkmoore@gswater.com)

TIFFANY THONG, RATES AND  
REGULATORY AFFAIRS MANAGER  
**PARK WATER COMPANY**  
P.O.Box 7002  
Downey, CA 90241  
[Tiffany.Thong@LibertyUtilities.com](mailto:Tiffany.Thong@LibertyUtilities.com)

### ONLY FOR SERVICE AREA MAPS:

PAUL N. NOVAK, EXECUTIVE OFFICER  
**Los Angeles LAFCO**  
80 South Lake Avenue, Suite 870  
Pasadena, CA 91101  
[pnovak@lalafco.org](mailto:pnovak@lalafco.org)



## East Los Angeles District

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

DANIEL A DELL'OSA  
**San Gabriel Valley Water Company**  
11142 Garvey Ave  
El Monte, CA 91733  
[dadellosa@sgvwater.com](mailto:dadellosa@sgvwater.com)

RICHARD GONZALES  
**City of Monterey Park**  
320 W Newmark Ave  
Monterey Park, CA 91754  
[rgonzales@montereypark.ca.gov](mailto:rgonzales@montereypark.ca.gov)

GEORGE NORIEGA  
**City of Monterey Park**  
320 W Newmark Ave  
Monterey Park, CA 91754  
[gnoriega@montereypark.ca.gov](mailto:gnoriega@montereypark.ca.gov)

KOREY BRADBURY  
**Montebello Land & Water Company**  
344 E Madison Ave  
Montebello, CA 90640  
[korey@mtblw.com](mailto:korey@mtblw.com)

MARIKO MARIANES, RATES MANAGER  
**City of Los Angeles Department of  
Water & Power**  
P.O.Box 51111 Room 956  
Los Angeles, CA 90051  
[mariko.marianes@ladwp.com](mailto:mariko.marianes@ladwp.com)

GINA NILA, DIRECTOR OF PUBLIC WORKS  
**City of Commerce**  
2535 Commerce Way  
Commerce, CA 90040

CESAR ROLDAN, DIRECTOR OF PUBLIC  
WORKS  
**City of Montebello**  
1600 W Beverly Blvd  
Montebello, CA 90640  
[croldan@montebelloca.gov](mailto:croldan@montebelloca.gov)

JOANNA MORENO  
**City of Vernon**  
4305 Santa Fe Ave  
Vernon, CA 90058  
[jmoreno@cityofvernon.org](mailto:jmoreno@cityofvernon.org)

TIFFANY THONG, RATES AND  
REGULATORY AFFAIRS MANAGER  
**PARK WATER COMPANY**  
P.O.Box 7002  
Downey, CA 90241  
[Tiffany.Thong@LibertyUtilities.com](mailto:Tiffany.Thong@LibertyUtilities.com)

KIKI CARLSON, REGULATORY AFFAIRS  
MANAGER  
**Suburban Water Systems**  
1325 N. Grand Avenue, Suite 100 Covina,  
CA 91724  
[kcarlson@swwc.com](mailto:kcarlson@swwc.com)

### **ONLY FOR SERVICE AREA MAPS:**

ALFIE BLANCH  
**Los Angeles County Fire Department**  
5847 Rickenbacker Rd  
Commerce, CA 90040  
[ablanch@fire.lacounty.gov](mailto:ablanch@fire.lacounty.gov)

PAUL N. NOVAK, EXECUTIVE OFFICER  
**Los Angeles LAFCO**  
80 South Lake Avenue, Suite 870  
Pasadena, CA 91101  
[pnovak@lalafco.org](mailto:pnovak@lalafco.org)



## Hermosa-Redondo District (South Bay Region)

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

ANDY DARLAK  
**City of Torrance Public Works**  
20500 Madrona Ave  
Torrance, CA 90630  
[adarlak@torranceca.gov](mailto:adarlak@torranceca.gov)

AUDREY JACKSON, REGULATORY  
AFFAIRS  
**Golden State Water Company**  
630 East Foodhill Blvd  
San Dimas, CA 91773  
[afjackson@gswater.com](mailto:afjackson@gswater.com)

FELICE LOPEZ, FINANCE DIRECTOR  
**City of Hawthorne**  
4455 W 126th St  
Hawthorne, CA 90250  
[flopez@cityofhawthorne.org](mailto:flopez@cityofhawthorne.org)

GEORGE CHEN, RATES MANAGER  
**City of Los Angeles, Department of  
Water & Power**  
P.O. Box 51111 Room 956  
Los Angeles, CA 90051  
[ZhengGeorge.Chen@ladwp.com](mailto:ZhengGeorge.Chen@ladwp.com)

GLEN KAU, PUBLIC WORKS DIRECTOR  
**City of Hermosa Beach**  
1315 Valley Dr  
Hermosa Beach, CA 90254  
[gkau@hermosabch.org](mailto:gkau@hermosabch.org)

ROB OSBORNE  
**City of Redondo Beach, Public Works  
Department**  
415 Diamond St  
Redondo Beach, CA 90277  
[rob.osborne@redondo.org](mailto:rob.osborne@redondo.org)

RONALD MOORE, REGULATORY  
AFFAIRS  
**Golden State Water Company,  
Department of Water & Power**  
630 East Foodhill Blvd  
San Dimas, CA 91773  
[rkmoore@gswater.com](mailto:rkmoore@gswater.com)

JEFF PAGE  
**City of Manhattan Beach**  
3621 Bell Ave  
Manhattan Beach, CA 90266  
[jpage@manhattanbeach.gov](mailto:jpage@manhattanbeach.gov)

**Park Billing Company**  
P.O.Box 910  
Dixon, CA 95620

### ONLY FOR SERVICE AREA MAPS:

ALFIE BLANCH  
**Los Angeles County Fire Department**  
5847 Rickenbacker Rd  
Commerce, CA 90040  
[ablanch@fire.lacounty.gov](mailto:ablanch@fire.lacounty.gov)

PAUL N. NOVAK, EXECUTIVE OFFICER  
**Los Angeles LAFCO**  
80 South Lake Avenue, Suite 870  
Pasadena, CA 91101  
[pnovak@lalafco.org](mailto:pnovak@lalafco.org)



## King City District (Salinas Valley Region)

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

STEVE ADAMS

**King City**

212 S. Vanderhurst Ave

King City, Ca 93930

[sadams@kingcity.com](mailto:sadams@kingcity.com)

**LITTLE BEAR WATER COMPANY**

51201 Pine Canyon Rd, Space #125

King City, CA 93930

**ONLY FOR SERVICE AREA MAPS:**

RUSS NICHOLS, FIRE CHIEF

**King City**

212 S. Vanderhurst Ave

King City, CA 93930

[kcfld@kingcity.com](mailto:kcfld@kingcity.com)

KATE MCKENNA, EXECUTIVE OFFICER

**LAFCO of Monterey County**

P.O. Box 1369

Salinas, CA 93902

[mckennak@monterey.lafco.ca.gov](mailto:mckennak@monterey.lafco.ca.gov)



## Livermore District

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

ALAMEDA COUNTY FLOOD CONTROL &  
WATER CONSERVATION

**District Zone 7 Water Agency**

100 North Canyons Parkway  
Livermore, CA 94551  
[osolitei@zone7water.com](mailto:osolitei@zone7water.com)

VALERIE PRYOR, GENERAL MANAGER

**District Zone 7 Water Agency**

100 North Canyons Parkway  
Livermore, CA 94551  
[vpryor@zone7water.com](mailto:vpryor@zone7water.com)

ERIK PETERSON, UTILITY BILLING  
DIVISION

**City of Livermore**

1052 S. Livermore Ave  
Livermore, CA 94550  
[etpeterson@ci.livermore.ca.us](mailto:etpeterson@ci.livermore.ca.us)

**STEVE LEHMAN**

3625 Thornhill Dr  
Livermore, CA 94551  
[slehman3625@gmail.com](mailto:slehman3625@gmail.com)

**ONLY FOR SERVICE AREA MAPS:**

JOE TESTA, FIRE CHIEF

**City of Livermore**

1052 S. Livermore Ave  
Livermore, CA 94550  
[mmclaughlin@lfire.org](mailto:mmclaughlin@lfire.org)

RACHEL JONES, EXECUTIVE OFFICER

**Alameda County LAFCO**

224 West Winton Ave., Suite 110  
Hayward, CA 94544  
[rachel.jones@acgov.org](mailto:rachel.jones@acgov.org)



## Los Altos District

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

PETER PIRNEJAD  
**Town of Los Altos Hills**  
26379 Fremont Road  
Los Altos Hills, CA 94022  
[ppirnejad@losaltoshills.ca.gov](mailto:ppirnejad@losaltoshills.ca.gov)

CATHERINE COX  
**City of Palo Alto, City Hall**  
250 Hamilton Ave  
Palo Alto, CA 94301  
[catherine.cox@cityofpaloalto.org](mailto:catherine.cox@cityofpaloalto.org)

CHRISTOPHER L DE GROOT  
**City of Santa Clara, Water Department,  
Water & Sewer Utilities**  
1500 Warburton Ave  
Santa Clara, CA 95050  
[cdegroot@santaclaraca.gov](mailto:cdegroot@santaclaraca.gov)

ARIKA MILLER  
**Town of Los Altos Hills**  
26379 Fremont Road  
Los Altos Hills, CA 94022  
[amiller@losaltoshills.ca.gov](mailto:amiller@losaltoshills.ca.gov)

JOHN B. TANG, P.E.  
**San Jose Water Company**  
110 W. Taylor Street  
San Jose, CA 95110  
[john.tang@sjwater.com](mailto:john.tang@sjwater.com)

PHIL WITT, GENERAL MANAGER  
**Purissima Hills Water District**  
26375 Fremont Rd  
Los Altos Hills, CA 94022  
[philw@purissimawater.org](mailto:philw@purissimawater.org)

SHILPA MEHTA  
**City of Santa Clara, Water Department,  
Water & Sewer Utilities**  
1500 Warburton Ave  
Santa Clara, CA 95050  
[smehta@santaclaraca.gov](mailto:smehta@santaclaraca.gov)

MATT MORLEY  
**City of Cupertino**  
10300 Torre Ave  
Cupertino, CA 95014  
[Mattm@cupertino.org](mailto:Mattm@cupertino.org)

MANSOUR NASSER  
**City of Sunnyvale, Water Dept.**  
P.O.Box 3707  
Sunnyvale, CA 94088  
[mnasser@sunnyvale.ca.gov](mailto:mnasser@sunnyvale.ca.gov)

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

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

**City of Santa Clara, Water Department,  
Water & Sewer Utilities**  
1500 Warburton Ave  
Santa Clara, CA 95050  
[water@santaclaraca.gov](mailto:water@santaclaraca.gov)

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

ANN SELLERS  
**City of Mountain View, Purchasing  
Dept.**  
231 N Whisman Rd  
Mt. View, CA 94043  
[Ann.Sellers@mountainview.gov](mailto:Ann.Sellers@mountainview.gov)



## Los Altos District

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

**ONLY FOR SERVICE AREA MAPS:**

NEELIMA PALACHERLA, EXECUTIVE  
DIRECTOR

**SANTA CLARA COUNTY LAFCO**

777 North First Street, Suite 410

San Jose, CA 95112

[neelima.palacherla@ceo.sccgov.org](mailto:neelima.palacherla@ceo.sccgov.org)



## Marysville District

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

DIANA LANGLEY, PUBLIC WORKS  
DIRECTOR/CITY ENGINEER  
**City of Yuba City**  
302 Burns Dr  
Yuba City, CA 95991  
[dlangley@yubacity.net](mailto:dlangley@yubacity.net)

BRIAN DAVIS  
GENERAL MANAGER  
**Linda County Water District**  
1280 Scales  
Marysville, CA 95901  
[bdavis@lindawater.com](mailto:bdavis@lindawater.com)

GENERAL MANAGER  
**Olivehurst Public Utility District**  
P.O.Box 670  
Olivehurst, CA 95961  
[opudmgr@opud.org](mailto:opudmgr@opud.org)

JENNIFER STYCZYNSKI, SENIOR  
ACCOUNTANT  
**City of Marysville**  
P.O.Box 150  
Marysville, CA 95901  
[jennifers@marysville.ca.us](mailto:jennifers@marysville.ca.us)

### **ONLY FOR SERVICE AREA MAPS:**

PAIGE HENSLEY, DEPUTY EXECUTIVE  
OFFICER  
**Yuba County LAFCO**  
915 8<sup>th</sup> St, Suite 107  
Marysville, CA 95901  
[phensley@co.yuba.ca.us](mailto:phensley@co.yuba.ca.us)

MARK KENDAL, DENNIS NOLAN;  
CHEIF OF OPERATIONS  
P.O. Box 944246  
Sacramento, CA 94244  
[mark.kendal@fire.ca.gov](mailto:mark.kendal@fire.ca.gov)  
[dennis.nolan@fire.ca.gov](mailto:dennis.nolan@fire.ca.gov)



## Oroville District (North Valley Region)

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

RUTH WRIGHT

**City of Oroville**

1735 Montgomery St  
Oroville, CA 95965

[wright@cityoforoville.org](mailto:wright@cityoforoville.org)

JAYME BOUCHER

**Thermalito Irrigation District**

410 Grand Ave  
Oroville, CA 95965

[jboucher@twsd.info](mailto:jboucher@twsd.info)

RATH MOSELEY, GENERAL MANAGER

**South Feather Water & Power**

2310 Oroville Quincy Hwy  
Oroville, CA 95966

[rmoseley@southfeather.com](mailto:rmoseley@southfeather.com)

**ONLY FOR SERVICE AREA MAPS:**

STEPHEN LUCAS, EXECUTIVE OFFICER

**Butte County LAFCO**

1453 Downer St, Suite C  
Oroville, CA 95965

[slucas@buttecounty.net](mailto:slucas@buttecounty.net)

FIRE CHIEF

**City of Oroville**

1735 Montgomery St  
Oroville, CA 95965



## Palos Verdes District (Los Angeles County Region)

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

ANDY DARLAK  
**City of Torrance Public Works**  
20500 Madrona Ave  
Torrance, CA 90630  
[adarlak@torranceca.gov](mailto:adarlak@torranceca.gov)

GEORGE CHEN, RATES MANAGER  
**City of Los Angeles, Department of Water & Power**  
P.O. Box 51111 Room 956  
Los Angeles, CA 90051  
[ZhengGeorge.Chen@ladwp.com](mailto:ZhengGeorge.Chen@ladwp.com)

JANE LIN  
**City of Rancho Palos Verdes**  
30940 Hawthorne Blvd  
Rancho Palos Verdes, CA 90275  
[janel@rpvca.gov](mailto:janel@rpvca.gov)

LINA HERNANDEZ **City of Lomita, Interim Public Works**  
P.O.Box 339  
Lomita, CA 90717  
[lina.hernandez@lomitacity.com](mailto:lina.hernandez@lomitacity.com)

MIKE WHITEHEAD  
**City of Rolling Hills Estates**  
4045 Palos Verdes Drive North  
Rolling Hills Estates, CA 90274

TRANG NGUYEN, DEPUTY DIRECTOR OF FINANCE  
**City of Rancho Palos Verdes**  
30940 Hawthorne Blvd  
Rancho Palos Verdes, CA 90275  
[tnguyen@rpvca.gov](mailto:tnguyen@rpvca.gov)

KYLYNN CHANEY, CITY CLERK  
**City of Palos Verdes Estates**  
340 Palos Verdes Dr West  
Palos Verdes Estates, CA 90274  
[cityclerk@pvestates.org](mailto:cityclerk@pvestates.org)

MARK PRESTWICH, CITY MANAGER  
**City of Palos Verdes Estates**  
340 Palos Verdes Dr West  
Palos Verdes Estates, CA 90274  
[citymanager@pvestates.org](mailto:citymanager@pvestates.org)

VINA RAMOS, ACCOUNTING SUPERVISOR  
**City of Rancho Palos Verdes**  
30940 Hawthorne Blvd  
Rancho Palos Verdes, CA 90275  
[vramos@rpvca.gov](mailto:vramos@rpvca.gov)

GREG GRAMMAR  
**City of Rolling Hills Estates**  
[gregg@ci.rolling-hills-estates.ca.us](mailto:gregg@ci.rolling-hills-estates.ca.us)

DAVID WAHBA  
**City of Rancho Palos Verdes**  
[davidw@ci.rolling-hills-estates.ca.us](mailto:davidw@ci.rolling-hills-estates.ca.us)

CHRISTIAN HORVATH, CITY CLERK  
**City of Rolling Hills**  
2 Portuguese Bend Road  
Rolling Hills CA 90274  
[chorvath@cityofrh.net](mailto:chorvath@cityofrh.net)

ARA MIHRANIAN  
**City of Rancho Palos Verdes**  
[AraM@rpvca.gov](mailto:AraM@rpvca.gov)

**City of Rancho Palos Verdes**  
30940 Hawthorne Blvd  
Rancho Palos Verdes, CA 90275  
[finance@rpvca.gov](mailto:finance@rpvca.gov)



## Palos Verdes District (Los Angeles County Region)

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

KIKI CARLSON, REGULATORY AFFAIRS  
MANAGER

**Suburban Water Systems**

1325 N. Grand Avenue, Suite 100

Covina, CA 91724

[kcarlson@swwc.com](mailto:kcarlson@swwc.com)

**ONLY FOR SERVICE AREA MAPS:**

ALFIE BLANCH

**Los Angeles County Fire Department**

5847 Rickenbacker Rd

Commerce, CA 90040

[ablanch@fire.lacounty.gov](mailto:ablanch@fire.lacounty.gov)

PAUL N. NOVAK, EXECUTIVE OFFICER

**Los Angeles LAFCO**

80 South Lake Avenue, Suite 870

Pasadena, CA 91101

[pnovak@lalafco.org](mailto:pnovak@lalafco.org)



## Redwood Valley District (Bay Area Region)

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

DIRECTOR OF PUBLIC WORKS

**County of Marin**

P.O.Box 4186  
San Rafael, CA 94913  
[rgaglione@marincounty.org](mailto:rgaglione@marincounty.org)

SCOTT HARTER

**County of Lake Special Districts**

230 North Main  
Lakeport, CA 95453  
[scott.harter@lakecountyca.gov](mailto:scott.harter@lakecountyca.gov)

SHARON DEMARTINI, ASSISTANT TO  
DIRECTOR OF PUBLIC WORKS

**County of Marin**

P.O. Box 4186  
San Rafael, CA 94913  
[sdemartini@marincounty.org](mailto:sdemartini@marincounty.org)

**CRAIG BACH**

[bachelectric.bach1@gmail.com](mailto:bachelectric.bach1@gmail.com)

**JOHN SUYDAM**

[jnsuydam@gmail.com](mailto:jnsuydam@gmail.com)

RACHEL JONES

**Cox Castle & Nicholson LLP**

50 California Street, Suite 3200  
San Francisco, CA 94111  
[rjones@coxcastle.com](mailto:rjones@coxcastle.com)

**North Marin Water District**

P.O. Box 146  
Novato, CA 94948  
[info@nmwd.com](mailto:info@nmwd.com)

**LISA CARTER**

[lisa.carter.333@gmail.com](mailto:lisa.carter.333@gmail.com)

**SCOTT MILLER**

P.O. Box 145  
Dillon beach, CA 94929  
[handmadeinmarin@gmail.com](mailto:handmadeinmarin@gmail.com)

**ONLY FOR SERVICE AREA MAPS:**

JASON FRIED, EXECUTIVE OFFICER

**Marin LAFCO**

1401 LOS GAMOS DRIVE, SUITE 220  
San Rafael, CA 94903  
[jfried@marinlafco.org](mailto:jfried@marinlafco.org)



## Salinas District (Salinas Valley Region)

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

BRIAN FRUS, INTERIM GENERAL  
MANAGER

**City of Salinas**  
200 Lincoln Ave  
Salinas, CA 93901

CHRISTOPHER A. CALLIHAN, CITY  
ATTORNEY

**City of Salinas**  
200 Lincoln Ave  
Salinas, CA 93901  
[chrisc@ci.salinas.ca.us](mailto:chrisc@ci.salinas.ca.us)

TOM ADCOCK  
**Alco Water Service**

249 Williams Rd  
Salinas, CA 93905  
[andrea@alcowater.com](mailto:andrea@alcowater.com)

**Gabilan Water Company**

644 San Juan Grade Road  
Salinas, CA 93906

CLAUDIA ESCALANTE, EXECUTIVE  
ASSISTANT

**Monterey County Administration**  
168 West Alisal Street, 3rd Floor  
Salinas, CA 93901  
[escalantec@co.monterey.ca.us](mailto:escalantec@co.monterey.ca.us)

SONIA M. DE LA ROSA, COUNTY  
ADMINISTRATIVE OFFICER

**Monterey County Administration**  
168 West Alisal Street, 3rd Floor  
Salinas, CA 93901  
[delarosasm@co.monterey.ca.us](mailto:delarosasm@co.monterey.ca.us)

**ONLY FOR SERVICE AREA MAPS:**

KATE MCKENNA, EXECUTIVE OFFICER  
**Monterey County LAFCO**

P.O. Box 1369  
Salinas, CA 93902  
[mkennak@monterey.lafco.ca.gov](mailto:mkennak@monterey.lafco.ca.gov)

SAMUEL KELMEK, FIRE CHIEF

**City of Salinas**  
200 Lincoln Ave  
Salinas, CA 93901

RUSS NICHOLS, FIRE CHIEF

**King City**  
212 S. Vanderhurst Ave  
King City, CA 93930  
[kcfid@kingcity.com](mailto:kcfid@kingcity.com)



## Selma District

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

BROCK BUCHE, DIRECTOR  
**City of Fresno, Department of Public  
Utilities**  
1626 E Street  
Fresno, CA 93706  
[Brock.Buche@fresno.gov](mailto:Brock.Buche@fresno.gov)

DARIO DOMINGUEZ , PUBLIC WORKS  
DIRECTOR  
**City of Fowler**  
128 S 5th St  
Fowler, CA 93625  
[ddominguez@ci.fowler.ca.us](mailto:ddominguez@ci.fowler.ca.us)

FERNANDO SANTILLAN, CITY MANAGER  
**City of Selma, City Manager**  
1710 TUCKER ST  
SELMA, CA 93662  
[fernandos@cityofselma.com](mailto:fernandos@cityofselma.com)

MAY ALBIANI, EXECUTIVE ASSISTANT  
**City of Fresno, Department of Public  
Utilities**  
1626 E Street  
Fresno, CA 93706  
[may.albiani@fresno.gov](mailto:may.albiani@fresno.gov)

JUAN RIOS, BUSINESS MANAGER  
**City of Fresno, Department of Public  
Utilities**  
1910 E. University Avenue  
Fresno, CA 93703  
[Juan.Rios@fresno.gov](mailto:Juan.Rios@fresno.gov)

### ONLY FOR SERVICE AREA MAPS:

BRIAN SPAUNHURST, EXECUTIVE  
OFFICER  
**Fresno County LAFCO**  
1401 FULTON STREET, SUITE 800  
Fresno, CA 93721  
[bspaunhurst@fresnocountyca.gov](mailto:bspaunhurst@fresnocountyca.gov)

JORDAN WEBSTER, FIRE CHIEF  
**City of Selma, City Hall**  
1710 Tucker St  
Selma, CA 93662  
[jordanw@cityofselma.com](mailto:jordanw@cityofselma.com)



## Stockton District

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

RACHEL DEBORD, CHIEF DEPUTY CLERK  
**San Joaquin County**  
44 N San Joaquin St, 6th Floor, Suite  
627  
Stockton, CA 95202  
[rdebord@sjgov.org](mailto:rdebord@sjgov.org)

DEPUTY DIRECTOR OF PUBLIC WORKS  
**County of San Joaquin**  
1810 East Hazelton Ave  
Stockton, CA 95205  
[fbuchman@sjgov.org](mailto:fbuchman@sjgov.org)

JOHN ABREW, MUNICIPAL UTILITIES  
DEPARTMENT DIRECTOR  
**City of Stockton**  
425 N El Dorado St  
Stockton, CA 95202  
[mud@stocktonca.gov](mailto:mud@stocktonca.gov)

HARRY BLACK, CITY MANAGER  
**City of Stockton**  
425 N El Dorado St  
Stockton, CA 95202  
[city.manager@stocktonca.gov](mailto:city.manager@stocktonca.gov)

CHRISTINA FUGAZI, MAYOR  
**City of Stockton**  
425 N El Dorado St  
Stockton, CA 95202  
[mayorfugazi@stocktonca.gov](mailto:mayorfugazi@stocktonca.gov)

MUNICIPAL UTILITY DEPARTMENT  
**City of Stockton**  
2500 Navy Dr  
Stockton, CA 95206  
[mud@stocktonca.gov](mailto:mud@stocktonca.gov)

SCOT A. MOODY, GENERAL MANAGER  
**Stockton-East Water District**  
6767 East Main Street  
Stockton, CA 95215  
[sewd@sewd.net](mailto:sewd@sewd.net)

**Park Billing Company**  
P.O.Box 910  
Dixon, CA 95620

### ONLY FOR SERVICE AREA MAPS:

J. D. HIGHTOWER, EXECUTIVE OFFICER  
**San Joaquin LAFCO**  
44 N. San Joaquin Street, Suite #374  
Stockton, CA 95202  
[jhightower@sjgov.org](mailto:jhightower@sjgov.org)

RICHARD J. EDWARDS, FIRE CHIEF  
**City of Stockton**  
400 E. Main Street, 4th floor  
Stockton, CA 95202



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

GLEN LUBLIN  
**Bedel Mutual Water Company**  
2536 E College Ave  
Visalia, CA 93292

LESLIE CAVIGLIA, CITY MANAGER  
**City of Visalia**  
220 N. Santa Fe St  
Visalia, CA 93291  
[leslie.caviglia@Visalia.City](mailto:leslie.caviglia@Visalia.City)

OSA WOLFF  
**Shute, Mihaly & Weinberger LLP**  
396 Hayes Street  
San Francisco, CA 94102  
[wolff@smwlaw.com](mailto:wolff@smwlaw.com)

**ONLY FOR SERVICE AREA MAPS:**

BEN GIULIANI, EXECUTIVE OFFICER  
**Tulare County , LAFCO**  
210 N. Church Street, Suite B  
Visalia, CA 93291  
[bgiuliani@tularecounty.ca.gov](mailto:bgiuliani@tularecounty.ca.gov)

DANIEL GRISWOLD, FIRE CHIEF  
**City of Visalia**  
707 West Acequia St  
Visalia, CA 93291  
[fd.online@visalia.city](mailto:fd.online@visalia.city)



## Westlake District

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

JOHN ZHAO, P.E.  
**Las Virgenes Municipal Water District**  
4232 Las Virgenes Road  
Calabasas, CA 91302  
[jzhao@lvmwd.com](mailto:jzhao@lvmwd.com)

URSULA BOSSON  
**Las Virgenes Municipal Water District**  
4232 Las Virgenes Road  
Calabasas, CA 91302  
[ubosson@lvmwd.com](mailto:ubosson@lvmwd.com)

GEORGE CHEN, RATES MANAGER  
**City of Los Angeles, Department of  
Water & Power**  
P.O. Box 51111 Room 956  
Los Angeles, CA 90051  
[ZhengGeorge.Chen@ladwp.com](mailto:ZhengGeorge.Chen@ladwp.com)

CLIFF FINLEY, PUBLIC WORKS DIRECTOR  
**City of Thousand Oaks**  
2100 Thousand Oaks Blvd  
Thousand Oaks, CA 91362  
[CFinley@toaks.org](mailto:CFinley@toaks.org)

JOCELYN ADLAO  
**Triunfo Water & Sanitation District**  
370 N. Westlake Blvd. Suite 100  
Westlake Village, CA 91362  
[JocelynAdlao@Triunfowsd.com](mailto:JocelynAdlao@Triunfowsd.com)

**CALIFORNIA-AMERICAN WATER  
COMPANY**  
520 Capitol Mall Ste. 630  
Sacramento, CA 95814  
[ca.rates@amwater.com](mailto:ca.rates@amwater.com)

### ONLY FOR SERVICE AREA MAPS:

KAI LUOMA, EXECUTIVE OFFICER  
**Ventura LAFCO**  
800 S Victoria Ave, Suite 301  
Ventura, CA 93003  
[kai.luoma@ventura.org](mailto:kai.luoma@ventura.org)

DAVID ENDAYA, FIRE CHIEF  
**City of Ventura Fire Department**  
1425 Dowell Drive  
Ventura, CA 93003  
[firechief@cityofventura.ca.gov](mailto:firechief@cityofventura.ca.gov)



## Willows District

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

MARTI BROWN, INTERIM CITY  
MANAGER

**City of Willows Civic Center**

201 N Lassen St  
Willows, CA 95988

[mbrown@cityofwillows.org](mailto:mbrown@cityofwillows.org)

**ONLY FOR SERVICE AREA MAPS:**

STEPHEN BETTS, INTERIM EXECUTIVE  
OFFICER

**County of Glenn Local Agency  
Formation Commission**

525 W. Sycamore St., Ste B1  
Willows, CA 95988

[srbetts@att.net](mailto:srbetts@att.net)

NATHAN MONCK, FIRE CHIEF

**City of Willows Fire Department**

445 South Butte St  
Willows, CA 95988

[nmonck@cityofwillows.org](mailto:nmonck@cityofwillows.org)