

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

**Advice Letter Cover Sheet**

**Utility Name:** California Water Service Company

**Date Mailed to Service List:** 03/15/2018

**District:** Hermosa Redondo

**CPUC Utility #:** U-60-W

**Protest Deadline (20<sup>th</sup> Day):** 04/04/2018

**Advice Letter #:** 2298

**Review Deadline (30<sup>th</sup> Day):** 04/14/2018

**Tier:** ☐ 1 ☒ 2 ☐ 3 ☐ Compliance

**Requested Effective Date:** 04/15/2018

**Authorization:** D.16-12-042

**Rate Impact:** 1.9% revenue  
increase

**Description:** Rate Base Offset for Hermosa Redondo

The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list. Please see the "Response or Protest" section in the advice letter for more information.

**Utility Contact:** Priya Rawal

**Utility Contact:** Natalie Wales

**Phone:** 408-367-8240

**Phone:** (408) 367-8566

**Email:** [prawal@calwater.com](mailto:prawal@calwater.com)

**Email:** [nwales@calwater.com](mailto:nwales@calwater.com)

**DWA Contact:** Tariff Unit

**Phone:** (415) 703-1133

**Email:** [Water.Division@cpuc.ca.gov](mailto:Water.Division@cpuc.ca.gov)

**DWA USE ONLY**

**DATE**

**STAFF**

**COMMENTS**

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

[ ] APPROVED

[ ] WITHDRAWN

[ ] REJECTED

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

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

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

\_\_\_\_\_



**CALIFORNIA WATER SERVICE COMPANY**

100 NORTH FIRST STREET

HERMOSA BEACH, CA 92648 ☎ (408) 367-8200 ☐ F (408) 367-8428

March 15, 2018

**Advice Letter No. 2298**

To The Public Utilities Commission of the State of California:

California Water Service Company ("Cal Water") respectfully submits this Tier 2 advice letter and hereby transmits for filing the following changes in its tariff schedules applicable to its Hermosa Redondo District.

CPUC <u>Sheet No.</u>	<u>Title of Sheet</u>	Schedule <u>No.</u>	CPUC <u>Sheet No.</u>
XXXX-W	Table of Contents (Page 1)		XXXXX-W
XXXX-W	Table of Contents (Page 2)		XXXXX-W
XXXX-W	Table of Contents (Page 7)		XXXXX-W
XXXX-W	Residential Metered Service	HR-1-R	XXXXX-W
XXXX-W	Nonresidential Metered Service	HR-1-NR	XXXXX-W
XXXX-W	Reclaimed Metered Service	HR-6	XXXXX-W
XXXX-W	Preliminary Statement M (WRAM / MCBA –HR)		XXXXX-W

**Summary**

This advice letter requests approval for a rate increase for the costs associated with a blending facility (PID 64502) in Cal Water's "Hermosa Redondo" ratemaking area to address water quality issues at two wells.<sup>1</sup> This is being submitted as Tier 2 advice letter with a requested effective date of April 15, 2018.

**Background**

The Commission adopted a Settlement Agreement and resolved Cal Water's 2015 General Rate Case in D.16-12-042.<sup>2</sup> As described in the introduction to the Plant Chapter for each district, the Settlement Agreement identifies capital projects that will not be included in new rates, but that may be recovered through an advice letter after the project is in service, up to a specified capped dollar amount. The list of approved projects that may be filed as "rate base offsets" is in Attachment 3 to the Settlement Agreement.

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<sup>1</sup> Note that this project was previously submitted in AL 2285, which Cal Water withdrew on November 29, 2017.

<sup>2</sup> D.16-12-042, Ordering Paragraph 1. The Settlement Agreement and its attachments are provided in Exhibit A to the decision.



Water Industry Rule 7.3.3(8) specifies that a rate base offset may be a Tier 2 filing if it meets the following requirements:

- (i) The Rate base offset was previously approved by the Commission in a decision or resolution
- (ii) The project scope is consistent with what the Commission approved
- (iii) The Commission approval included a budget cap and the rate base offset request is at a below the budget cap.

### **Discussion**

In the 2012 GRC, Cal Water proposed PID 64502 for two nanofiltration treatment facilities to mitigate secondary maximum contaminant level exceedances of Total Dissolved Solids (TDS) and Specific Conductivity (EC) at a cost of \$1.6 million each for wells 8-02 and 22-02. In rebuttal, Cal Water provided a revised cost estimate of \$5 million per site.

At ORA's suggestion, Cal Water explored blending as a solution. Under this approach, Cal Water would construct a pipeline to transport water from both wells to one of its existing facilities for blending with purchased water prior to distribution, at a total cost of \$4,080,000. Thus, ORA and Cal Water agreed to modify and include Project 64502 as an Advice Letter with a cap of \$4,080,000.

The final cost of the project, not including the costs of retirements, was \$4,168,839, however Cal Water requests revenue recovery up to the capped amount of \$4,080,000. This would result in an annual revenue increase of \$579,012, or 1.9%. The typical residential customer using 7 CCF will see a \$0.84 monthly increase in their water bill. The details relating to the calculations for the above amounts are contained in work papers.

### **Requested Effective Date**

Cal Water requests that the proposed tariffs in this advice letter become effective April 15, 2018.

### **Notice**

*Customer Notice* – Individual customer notice of this advice letter is not required under General Order 96-B, Water Industry Rule 3.1, because the requested rate increase is an offset of less than 10% of the district's revenue requirement.

*Service Lists* – 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 mailed or electronically transmitted on



March 15, 2018 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. 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:



**CALIFORNIA WATER SERVICE COMPANY**

Advice Letter 2298, Hermosa-Redondo Ratebase Offset

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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 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.

**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/

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Priya Rawal, Rates Analyst

Enclosures

cc: Ting-Pong Yuen, ORA

**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</u>	<u>Subject Matter</u>	<u>Service Area</u>	<u>Schedule No.</u>	<u>CPUC Sheet No.</u>
	Title Page			5613-W
	Table of Contents			
Page 1	Table of Contents			XXXXX-W (C)
Page 2	Preliminary Statements			XXXXX-W (C)
Page 3	Preliminary Statements			11614-W
Page 4	Preliminary Statements			11469-W
Page 5	Rate Schedules - All Districts			11521-W
Page 6	Rate Schedules - District Specific			11613-W
Page 7	Rate Schedules - District Specific			XXXXX-W (C)
Page 8	Rate Schedules - District Specific			11611-W
Page 9	Rate Schedules - District Specific			11307-W
Page 10	Rate Schedules - District Specific			11610-W
Page 11	Service Area Maps			11618-W
Page 12	Rules			11621-W
Page 13	Rules			11304-W
Page 14	Sample Forms			11409-W
Page 15	Sample Forms			2926-W-W

(continued)

(To be inserted by utility)  
Advice Letter No. 2298  
Decision No.

Issued by  
PAUL G. TOWNSLEY  
Name  
Vice President  
TITLE

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

**Table of Contents - Page 2**

Preliminary Statements

<u>Sheet</u>	<u>Subject Matter</u>	<u>Service Area</u>	<u>CPUC Sheet No.</u>
<u>Preliminary Statements</u>			
A	Territory Served by the Utility		9240-W
	Page 1		
	Page 2		8212-W
B-D	Types and Classes of Service, Procedure to Obtain Service, and Symbols		610-W
F	Methyl Tertiary Butyl Ether Memorandum Account (MTBE MA)		8312-W
H	Low-Income Ratepayer Assistance (LIRA) Memorandum Account		11323-W
K	Wausau Memorandum Account (WMA)		7313-W
M	Water Revenue Adjustment Mechanism/ Modified Cost Balancing Account (WRAM/MCBA)		
	Page 1		9345-W
	Page 2		8372-W
	Bakersfield	BK	11583-W
	Bay Area Region	BAR	11534-W
	Bear Gulch	BG	11543-W
	Chico	CH	11542-W
	Dixon	DX	11541-W
	Dominguez	DOM	11582-W
	East Los Angeles	EL	11581-W
	Hermosa Redondo	HR	XXXXX-W (C)
	Kern River Valley	KRV	11579-W
	Livermore	LV	11540-W
	Los Altos	LS	11539-W
	Los Angeles County Region	LAR	11575-W
	Marysville	MR	11538-W
	Monterey Region	MOR	11533-W
	Oroville	OR	11537-W
	Selma	SL	11578-W

(continued)

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**Table of Contents - Page 7**

<u>Sheet Subject Matter</u>	<u>Rate Schedules Service Area</u>	<u>Schedule No.</u>	<u>CPUC Sheet No.</u>
<u>Rate Schedules: (continued)</u>			
<b>DIXON DISTRICT</b>			
Residential Metered Service		DX-1-R	11563-W
Nonresidential Metered Service		DX-1-NR	11562-W
Private Fire Protection Service		DX-4	10288-W
<b>DOMINGUEZ DISTRICT</b>			
Residential Metered Service		DOM-1-R	11605-W
Nonresidential Metered Service		DOM-1-NR	11604-W
Recycled Water Service			
Page 1		DOM-RC-1	11604-W
Private Fire Protection Service		DOM-4	10293-W
<b>EAST LOS ANGELES DISTRICT</b>			
Residential Metered Service		EL-1-R	11603-W
Nonresidential Metered Service		EL-1-NR	11602-W
Reclaimed Water Service		EL-6	11601-W
Private Fire Protection Service		EL-4	10296-W
<b>GRAND OAKS DISTRICT</b>			
Residential Metered Service-		GO-R-1	7437-W
<b>HERMOSA-REDONDO DISTRICT</b>			
Residential Metered Service		HR-1-R	XXXXX-W (C)
Nonresidential Metered Service		HR-1-NR	XXXXX-W (C)
Private Fire Protection Service		HR-4	10299-W
Private Fire Protection Service		HR-4RPF	4652-W
Public Fire Hydrant Service		HR-5	3446-W
Reclaimed Water Service		HR-6	XXXXX-W (C)
<b>KERN RIVER VALLEY DISTRICT</b>			
General Metered Service		KRV-1 (Pg 1 of 2)	11597-W
		KRV-1 (Pg 2 of 2)	11596-W
Interruptible Public Authority			
Irrigation Service	Kernville	KRV-KD-2	10307-W
Private Fire Protection Service		KRV-4	10308-W

(continued)

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**Preliminary Statement**  
(continued)

**M. PRELIMINARY STATEMENT M (WRAM/MCBA - HERMOSA-REDONDO)**

Monthly Detail  
(In Thousands of Dollars)

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Month	Quantity Charge Revenue for WRAM	Service Charge and other Non- WRAM Revenue	Total Revenue	Purchased Water	Pump Tax	Purchased Power	Total Production Cost	
JAN	\$ 1,789.7	\$ 645.7	\$ 2,435.4	\$ 978.4	\$ 52.1	\$ 29.3	\$ 1,059.8	( C )
FEB	\$ 1,653.8	\$ 645.7	\$ 2,299.5	\$ 845.2	\$ 51.5	\$ 26.0	\$ 922.7	
MAR	\$ 1,695.4	\$ 645.7	\$ 2,341.1	\$ 979.1	\$ 57.4	\$ 29.9	\$ 1,066.3	
APR	\$ 1,722.2	\$ 645.7	\$ 2,367.9	\$ 1,037.4	\$ 51.8	\$ 30.8	\$ 1,120.0	
MAY	\$ 1,835.7	\$ 645.7	\$ 2,481.4	\$ 1,175.6	\$ 58.2	\$ 34.8	\$ 1,268.7	
JUN	\$ 2,152.6	\$ 645.7	\$ 2,798.3	\$ 1,197.2	\$ 57.7	\$ 35.3	\$ 1,290.2	
JUL	\$ 2,243.0	\$ 645.7	\$ 2,888.7	\$ 1,246.5	\$ 58.7	\$ 36.6	\$ 1,341.7	
AUG	\$ 2,229.2	\$ 645.7	\$ 2,874.9	\$ 1,240.8	\$ 59.6	\$ 36.6	\$ 1,336.9	
SEP	\$ 2,436.8	\$ 645.7	\$ 3,082.5	\$ 1,182.8	\$ 55.5	\$ 34.7	\$ 1,273.1	
OCT	\$ 2,019.7	\$ 645.7	\$ 2,665.4	\$ 1,137.7	\$ 48.1	\$ 32.9	\$ 1,218.7	
NOV	\$ 1,944.8	\$ 645.7	\$ 2,590.5	\$ 1,040.3	\$ 46.7	\$ 30.3	\$ 1,117.3	
DEC	\$ 1,836.9	\$ 645.7	\$ 2,482.6	\$ 765.8	\$ 55.4	\$ 24.4	\$ 845.7	
12 Month Total	\$ 23,559.9	\$ 7,748.1	\$ 31,308.0	\$ 12,826.6	\$ 652.8	\$ 381.6	\$ 13,861.0	( C )

(continued)

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Schedule No. HR-1-R  
**Hermosa Redondo Tariff Area**  
RESIDENTIAL METERED SERVICE

APPLICABILITY

Applicable to all metered water service provided to single-family residential customers.

TERRITORY

Hermosa Beach, Redondo Beach, Torrance, and vicinity, Los Angeles County

RATES

1 CCF is 100 cubic feet (748 gallons)

Quantity Rates:

For 1 - 10 CCF, per CCF	\$4.5052	(l)
For 11 to 15 CCF, per CCF	\$4.8885	
For over 15 CCF, per CCF	\$5.7513	(l)

Service Charge:

	Per Meter	
	Per Month	
For 5/8 x 3/4 - inch meter	\$12.19	(l)
For 3/4 - inch meter	\$18.29	
For Fire Sprinkler with 1 - inch meter	\$12.19	
For 1 - inch meter	\$30.48	
For 1-1/2 - inch meter	\$60.95	
For 2 - inch meter	\$97.52	
For 3 - inch meter	\$182.85	
For 4 - inch meter	\$304.75	
For 6 - inch meter	\$609.50	
For 8 - inch meter	\$975.20	
For 10 - inch meter	\$1,401.85	
For 12 - inch meter	\$2,011.35	
For 14 - inch meter	\$2,742.75	(l)

The service charge is a readiness-to-serve charge which is applicable to all metered service and to which is added the charge for water used computed at the quantity rates.

SPECIAL CONDITIONS

1. Qualifying low-income individually metered residential customers are eligible for credits as shown on **Schedule LIRA**.
2. All bills are subject to the following tariff schedules: **Schedule UF** (CPUC reimbursement fee) and applicable surcharges and surcredits on **Schedule RSF** (Rate Support Fund), **Schedule LIRA** (Low-Income Ratepayer Assistance), and **Schedule AS** (Additional Surcharges and Surcredits).
3. **Fire sprinkler rate:** Any service to a residential customer not exceeding two units on a lot size of 10,000 square feet or less with a meter size that has a "fire sprinkler" rate (listed above) is eligible for that rate if: (a) the customer is paying for service where a residential fire sprinkler system is required/requested to be installed by local fire or building codes; (b) a smaller meter would be large enough to provide adequate service in the absence of the additional demand needed to supply water to the system; (c) the sprinkler system is served through the meter providing residential water service; and (d) the customer requests the "fire sprinkler" rate. The Company may seek verification that the above criteria are met. This service will be considered a general metered service, and not a fire service, so the rules and conditions for general metered service shall apply. The fire sprinkler rate for a qualifying 1-inch meter shall be the same as the rate for a 5/8 x 3/4-inch meter service charge.
4. **Water Expense Increase:** Beginning on or after January 1, 2018, an increase in purchased water costs of \$0.0408/CCF for Tier 1 usage, \$0.0443/CCF for Tier 2 usage, and \$0.0521/CCF for Tier 3 usage, and an associated increase in total revenue of 0.7% (relative to the costs and revenues approved in AL 2263) are being tracked in a balancing account as required by Section 792.5 of the Public Utilities Code.

(To be inserted by utility)  
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Decision No. \_\_\_\_\_

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Date Filed \_\_\_\_\_  
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Schedule No. HR-1-NR  
**Hermosa Redondo Tariff Area**  
NONRESIDENTIAL METERED SERVICE

APPLICABILITY

Applicable to all metered water service except that provided to single-family residential customers.

TERRITORY

Hermosa Beach, Redondo Beach, Torrance, and vicinity, Los Angeles County

RATES

1 CCF is 100 cubic feet (748 gallons)

Quantity Rates:

Per CCF \$5.1878 (I)

Service Charge:

Per Meter  
Per Month

For	5/8 x 3/4 - inch meter	\$9.80	(I)
For	3/4 - inch meter	\$14.70	
For	1 - inch meter	\$24.50	
For	1-1/2 - inch meter	\$49.00	
For	2 - inch meter	\$78.40	
For	3 - inch meter	\$147.00	
For	4 - inch meter	\$245.00	
For	6 - inch meter	\$490.00	
For	8 - inch meter	\$784.00	
For	10 - inch meter	\$1,127.00	
For	12 - inch meter	\$1,617.00	
For	14 - inch meter	\$2,205.00	(I)

The service charge is a readiness-to-serve charge which is applicable to all metered service and to which is added the charge for water used computed at the quantity rates.

SPECIAL CONDITIONS

1. All bills are subject to the following tariff schedules: **Schedule UF** (CPUC reimbursement fee) and applicable surcharges and surcredits on **Schedule RSF** (Rate Support Fund), **Schedule LIRA** (Low-Income Ratepayer Assistance), and **Schedule AS** (Additional Surcharges and Surcredits).
2. Qualifying non-profit group living facilities, agricultural employee housing facilities, and migrant farm worker housing centers are eligible for credits as shown on **Schedule LIRA**.
3. **Water Expense Increase:** Beginning on or after January 1, 2018, an increase in purchased water costs of \$0.0470/CCF and an associated increase in total revenue of 0.7% (relative to the costs and revenues approved in AL 2263) are being tracked in a balancing account as required by Section 792.5 of the Public Utilities Code.

Schedule No. HR-6  
**Hermosa Redondo Tariff Area**  
**RECLAIMED METERED SERVICE**

**APPLICABILITY**

Applicable to all metered reclaimed water service

**TERRITORY**

Hermosa Beach, Redondo Beach, Torrance, and vicinity, Los Angeles County

**RATES**

1 CCF is 100 cubic feet (748 gallons)

Quantity Rates:  
Per CCF

\$4.1751 (l)

Service Charge:

Per Meter

Per Month

For	5/8 x 3/4 - inch meter	\$11.16 (l)
For	3/4 - inch meter	\$16.74
For	1 - inch meter	\$27.90
For	1-1/2 - inch meter	\$55.80
For	2 - inch meter	\$89.28
For	3 - inch meter	\$167.40
For	4 - inch meter	\$279.00
For	6 - inch meter	\$558.00
For	8 - inch meter	\$892.80
For	10 - inch meter	\$1,283.40
For	12 - inch meter	\$1,841.40
For	14 - inch meter	\$2,511.00 (l)

The service charge is a readiness-to-serve charge which is applicable to all metered service and to which is added the charge for water used computed at the quantity rates.

**SPECIAL CONDITIONS**

1. Reclaimed water will be supplied only as available from West Basin Municipal Water District.
  2. As a condition of service under this schedule, all customers are required to comply with the Company's Rule 16, Section D, Reclaimed Water Service.
  3. All bills are subject to the following tariff schedules: **Schedule UF** (CPUC reimbursement fee) and applicable surcharges and surcredits on **Schedule RSF** (Rate Support Fund), **Schedule LIRA** (Low-Income Ratepayer Assistance), and **Schedule AS** (Additional Surcharges and Surcredits).
  4. **Water Expense Increase:** Beginning on or after January 1, 2018, an increase in purchased water costs of \$0.0378/CCF and an associated increase in total revenue of 0.7% (relative to the costs and revenues approved in AL 2263) are being tracked in a balancing account as required by Section 792.5 of the Public Utilities Code.
- \* Reclaimed water customers that have signed a contract with the West Basin Municipal Water District (West Basin) for repayment of the conversion costs from potable to reclaimed water service will be charged the potable quantity rates while the contract is in effect. The Company will pay West Basin a percentage of the quantity rate revenues collected from reclaimed water customers billed at potable water rates. The percentage refunded represents the difference between the current West Basin wholesale potable water rate and the wholesale reclaimed water rate.

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## Hermosa-Redondo District

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

DIRECTOR OF PUBLIC WORKS/CITY  
ENGINEER, P.E.

**City of Hermosa Beach**  
1315 Valley Dr  
Hermosa Beach, CA 90254  
abrozyna@hermosabch.org

ROB OSBORNE  
**City of Redondo Beach, Public Works  
Dept**  
415 Diamond St  
Redondo Beach, CA 90277  
rob.osborne@redondo.org

ALAN BERNDT  
**City of Torrance, Dept of Water**  
20500 Madrona Ave  
Torrance, CA 90630  
aberndt@torranceca.gov

SHAWN IGOE  
**City of Manhattan Beach**  
3621 Bell Ave  
Manhattan Beach, CA 90266  
sigoe@citymb.info

FINANCE DIRECTOR  
**City of Hawthorne**  
4455 W 126th St  
Hawthorne, CA 90250  
rmanbahal@cityofhawthorne.org

GEORGE CHEN, RATES MANAGER

**City of Los Angeles, Dept. of Water &  
Power**  
P.O. Box 51111 Room 956  
Los Angeles, CA 90051  
ZhengGeorge.Chen@ladwp.com

AUDREY JACKSON, REGULATORY  
AFFAIRS  
**Golden State Water Company**  
630 East Foodhill Blvd  
San Dimas, CA 91773  
afjackson@gswater.com

RONALD MOORE, REGULATORY  
AFFAIRS  
**Golden State Water Company**  
630 East Foodhill Blvd  
San Dimas, CA 91773  
rkmoore@gswater.com

TINA DAVIS AND VICKY MILLER  
**Park Billing Company**  
P.O.Box 910  
Dixon, CA 95620  
tdavis@parkbilling.com  
vmiller@parkbilling.com