STATE OF CALIFORNIA GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



April 28, 2023

Natalie Wales Director of Regulatory Policy & Compliance California Water Service Company 1720 North First Street San Jose, CA 95112-4598

Dear Ms. Wales,

The Water Division of the California Public Utilities Commission has approved California Water Service Company's Advice Letter No. 2477-A (Supplement to Advice Letter No. 2477), filed on April 7, 2023, regarding 2022 WRAM/MCBA balance amortization for all Class A Ratemaking areas except Travis.

Enclosed are copies of the following revised tariff sheets, effective May 5, 2023, for the utility's files:

	P.U.C. Sheet	
_	No.	Title of Sheet
	13168-W	Schedule No. AS, Page 1
		Additional Surcharges/Surcredits
	13169-W	Table of Contents - Page 5
	13170-W	Table of Contents - Page 1
	Cancel	12521-W, Additional Surcharges/Surcredits, Page 6

Please contact Mahdi Jahami at MJ4@cpuc.ca.gov or 916-743-5080, if you have any questions.

Thank you.

Enclosures

CALIFORNIA PUBLIC UTILITIES COMMISSION DIVISION OF WATER AND AUDITS

Advice Letter Cover Sheet

Date Mailed to Service List: 04/07/2023

Utility Name: California Water Service Company

District:	All Class A Ratema Travis (excludes G	aking Areas except Grand Oaks)			
CPUC Utility #:	U-60-W		Protest Deadline (2	0 th Day):	04/19/2023
Advice Letter #:	2477-A		Review Deadline (3	0 th Day):	04/29/2023
Tier:	□ 2 □3	☐ Compliance	Requested Effect	ive Date:	05/05/2023
Authorization:			Dota	Imposti	Various
Description:	Supplement - 202 balance amortizat Ratemaking areas	tion for all Class A	Kate	e Impact:	various
The protest or response to the service list. Please		· · · · · · · · · · · · · · · · · · ·			
Utility Contac	t: Melody Singh		Utility Contact:	Natalie V	Vales
Phon	e: 916-329-1856		Phone:	408-367	-8566
Ema	il: msingh@calwa	ter.com	Email:	Nwales@	ocalwater.com
DWA Contact Phone Email	e: (415) 703-1133				
DATE	CTAFE	DWA USE ONLY	CON	1N/ENITS	
<u>DATE</u>	<u>STAFF</u>		CON	<u>1MENTS</u>	
		_			
		_			
		_			
[] APPROVED		[] WITHDRAW	N	[] REJECTED
Signature:		Comments:			
Date:		<u>_</u>			



April 7, 2023

Advice Letter No. 2477-A

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			Cancelling CPUC
Sheet No.	Title of Sheet	Schedule No.	Sheet No.
	Additional Surcharges/Surcredits		
13168-W	Page 1	AS	12940-W
	Additional Surcharges/Surcredits		
Delete	Page 6	AS	
13169-W	Table of Contents Page 5	TOC 5	13166-W
13170-W	Table of Contents Page 1	TOC 1	13167-W

Summary

This advice letter complies with the requirement to address the balances in the Water Revenue Adjustment Mechanism and Modified Cost Balancing Accounts (WRAM/MCBA) for all Class A ratemaking areas except Travis (which does not have a WRAM/MCBA). Accordingly, Cal Water requests WRAM/MCBA amortization for the following areas: Antelope Valley, Bakersfield, Bay Area Region, Bear Gulch, Chico, Dixon, Dominguez, East Los Angeles, Hermosa-Redondo, Kern River Valley, Livermore, Los Altos, Marysville, Oroville, Palos Verdes, Salinas Valley Region, Selma, Stockton, Visalia, Westlake, and Willows.

Supplement to AL 2477: In an effort to sync up rate changes and help balance affordability, Cal Water requests a modification to some WRAM surcharges proposed in AL 2477, and a beginning effective date of **May 5, 2023** rather than April 15, 2023.

Background

On February 28, 2008, the Commission issued D.08-02-036, which in part adopted a WRAM Settlement Agreement between Cal Water, DRA, and TURN filed on June 15, 2007.

This advice letter filing proposes to respond to the following provisions of the WRAM Settlement Agreement (adopted in Ordering Paragraph 1 of D.08-02-036):

IX.3) Parties agree that, in each district, the balance in the WRAM will offset the balances in the MCBAs in the following manner:

- a. Reporting Requirements: By April 1st of each year, Cal Water will provide the Water Division (with a copy to DRA) with a written report on the status of the WRAM and MCBAs as described herein.
- b. WRAM: The written report will include a section on the WRAM in each district showing the revenue over- or under-collection with respect to the Actual (or recorded) water sales as of December 31st of the preceding calendar year. Differences between Actual Revenues and Adopted Revenues will be tracked in the WRAM and accrue interest at the 90 day commercial paper rate.
- c. MCBA: The written report will include a section on the MCBA's in each district comparing Actual MCBA Costs with Adopted MCBA costs as of December 31st of the preceding calendar year. Differences between Actual Costs and Adopted Costs will be tracked in the MCBAs and accrue interest at the 90-day commercial paper rate.
- d. If this report shows that the combined over- or under-collection for the WRAM or the MCBAs in any district exceed 2.5% of the district's total recorded revenue requirement for the prior calendar year, Cal Water will file an advice letter within 30 days that amortizes the balance in both of the accounts in the district.

Standard Compliance Issues

<u>Differences from Preliminary Statement M</u>: The adopted revenues shown on the Preliminary Statement M for each ratemaking area identify forward-looking annual revenues. This annual true-up submission addresses adopted revenue from the last calendar year. In order to have a comparison of the correct time frame, Cal Water booked the adopted revenues pro-rated for each advice letter's effective date. As a result of this pro-ration, the adopted revenue shown in Cal Water's report is different than the amount in the Preliminary Statement M.

MCBA Issues: The net WRAM and MCBA balance is allocated 100% to metered customers. The MCBA balance previously applied to both flat-rate and metered customers. However, per Advice Letter 2357-A, Cal Water is authorized to eliminate the MCBA charge and credit to flat rate customers, effective for WRAM/MCBA balances incurred starting 1/1/2020. In particular, the following paragraph, which was originally in Preliminary Statement M in Section 6, was eliminated:

B. In districts with flat rate residential and raw water irrigation customers, Cal Water shall amortize any MCBA balance to ensure that a proportional share of the MCBA recovery or refund is applied to flat rate residential or raw water irrigation customers. Adopted sales for these classes as compared to total adopted sales should be used to determine proportional shares.

The WRAM Settlement Agreement also stipulates that significant changes in water purchases, defined as a change that is greater than 10%, require additional explanations in these WRAM/MCBA filings.

Compliance with D.12-04-048: In April 2012, the Commission adopted a decision modifying various aspects of the true-up process in response to changes proposed by Cal Water and other companies. D.12-04-048 allows companies the option to amortize a net balance (positive or negative) that is less than 2% of a ratemaking area's last adopted revenue requirement. If the combined net balance deviates by 2% or more in either direction, however, the company is required to amortize the balance as follows:

Net balances of 2%-5%: 12-month amortization.

Net balances of 5%-15%: 18-month amortization.

Net balances of 15%-30%: an amortization period of between 19 and 36 months.

Net balances over 30%: 36-month amortization.

Furthermore, Ordering Paragraph 3 of D.12-04-048 applies "a cap on total net WRAM/MCBA surcharges of 10% of the last authorized revenue requirement." For Cal Water, this cap began to apply to WRAM/MCBA balances incurred in calendar year 2014. The proposed amortizations in this submission are consistent with all of these aspects of D.12-04-048, with some exceptions relating to the uncertain future of full decoupling WRAM/MCBA mechanisms and to minimize rate shock, as discussed further below.

<u>Information-Only WRAM Submission</u>: On November 30, 2022, Cal Water made an Information-Only filing detailing the WRAM and MCBA data for nine months. (This advice letter includes an updated twelve months of WRAM and MCBA data along with the variance analysis.)

Discussion

The workpapers for this filing provide a table detailing the net balances for the WRAM/MCBA accounts for each area as of December 31, 2022. 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 is the net balance on December 31, 2022, plus compounded interest amounts accrued over the duration of the amortization, up to the 10% cap discussed below.

<u>Balances Included in this Filing:</u> In addition to the net WRAM and MCBA balances for calendar year 2022, Cal Water proposes including the following:

- (1) 2021 WRAM/MCBA deferrals,
- (2) Uncollected revenue from the existing surcharges for the 2020 and 2021 true-up balance due to sales decline; and

¹ OP 3 states that "WRAM/MCBA account balances incurred prior to calendar year, 2014, continue to be amortized under the adopted amortization schedule without being subject to the surcharge cap." D.12-04-048 on p.42.

- Cal Water receives Commission authority to amortize accounts over a specific time period. Cal Water's billing system then implements the surcharge or credit for the given duration. When the system stops billing the surcharge or credit, there is an undercollected or over-collected balance due to deviations in actual sales from adopted sales. These balances are different from those described in Item (1), above. While Item (1) addresses under/over-collected revenues associated with <u>existing</u> surcharges and credits, Item (2) addresses under/over-collected revenues associated with surcharges and credits that have already stopped.
- (3) The deferred WRAM/MCBA balances for those districts that exceeded the 10% cap limitation in the 2021 filing for WRAM/MCBA balances incurred in 2020 and earlier. These districts were Kern River Valley and Selma.

<u>Ten Percent Cap on WRAM Recovery</u>: The 10% cap established in Ordering Paragraph 3 of D.12-04-048 compares the net WRAM/MCBA balances sought for amortization to the last authorized revenue requirement. Amounts above the cap must be deferred for later recovery. Applying the 10% cap to the balances incurred through the end of 2022 results in WRAM/MCBA deferrals for the following areas: Chico, Dominguez, Livermore and Stockton. Cal Water's proposals to address these balances are discussed below.

<u>Compliance with LIRA Phase 1 Decision</u>: In August 2020, the Commission adopted Ordering Paragraph 3 in D.20-08-047,² which states that several utilities including Cal Water "shall not propose continuing existing Water Revenue Adjustment Mechanisms/Modified Cost Balancing Accounts but may propose to use Monterey-Style Water Revenue Adjustment Mechanisms and Incremental Cost Balancing Accounts." Accordingly, Cal Water lacked authority to request a WRAM/MCBA in its 2021 rate case (A.21-07-002) for Test Year 2023.

As a result of D.20-08-047, calendar year 2022 is the last year Cal Water can track costs and revenues in the current full decoupling WRAM/MCBA mechanisms. Accordingly, 2023 is the last year Cal Water can seek cost recovery pursuant to the existing Preliminary Statement M,⁴ however Cal Water is still limited by D.12-04-048 to revenue recovery through WRAM surcharges (including previously-approved WRAM surcharges that are in effect) up to 10% of revenue requirement.

² Order Instituting Rulemaking Evaluating the Commission's 2010 Water Action Plan Objective of Achieving Consistency between Class A Water Utilities' Low-Income Rate Assistance Programs, Providing Rate Assistance to All Low-Income Customers of Investor-Owned Water Utilities, and Affordability, *Decision and Order*, R.17-06-024 (August 27, 2020) ("LIRA Phase 1 Decision").

³ Note that Senate Bill 1469 amended Public Utilities Code Section 727.5 and became effective January 1, 2023. SB 1469 allows large water companies to propose a full decoupling WRAM/MCBA either in a general rate case or, with the consent of the Commission, a separate application. In addition, Cal Water and other water company representatives filed Petitions for Writ of Review of D.20-08-047 before the California Supreme Court, and the case is pending (Case Nos. S269009 and S271493).

⁴ In the absence of a final decision in A.21-07-002, but with an approved Interim Rates Memorandum Account to allow a decision's effective date to be retroactive back to January 1, 2023, Cal Water assumes for the purposes of this advice letter that the Preliminary Statement Ms for its full decoupling WRAM/MCBAs will be replaced by preliminary statements for Monterey-Style WRAMs as of January 1, 2023.

For **Dominguez** and **Livermore**, Cal Water therefore requests to amortize the balances over the 10% cap through a subsequent surcharge (after the previously-approved 2021 WRAM/MCBA surcharges expire, which will be August 14, 2024 for Dominguez and April 14, 2024 for Livermore), so that total revenues collected from customers through WRAM surcharges in a 12-month period do not exceed 10% of that ratemaking area's revenue requirement. For **Chico** and **Stockton**, Cal Water only requests one WRAM surcharge (for each area), but proposes to extend their amortization periods until January 4, 2024 in order to stay under the 10% cap).

<u>Supplementing AL 2477 to Minimize Rate Shock:</u> In order to minimize the bill impact of the new surcharges, Cal Water proposes increasing the 2022 WRAM/MCBA surcharge amortization window for the following districts: **Antelope Valley, Bakersfield, Los Altos, Palos Verdes, and Westlake**.

For **Dixon** customers, Cal Water proposes to extend the 2022 WRAM/MCBA surcharge amortization window and stagger the total increase. Therefore, while the currently existing 2021 WRAM/MCBA surcharge is still in place, a lower 2022 WRAM/MCBA surcharge would be put into effect. When the 2021 WRAM/MCBA surcharges expires, Cal Water proposes to increase the 2022 WRAM/MCBA surcharge for the remaining amortization window.

Finally, for **Kern River Valley** customers, Cal Water proposes to defer the 2022 WRAM/MCBA surcharge until an implementation date of 1/15/2024, when the 2020 WRAM/MCBA surcharge expires.

<u>Supplementing AL 2477 to Change Effective Date:</u> On March 31, 2023, Cal Water filed AL 2478 to amortize unspent conservation funds via surcredits to be applied to customer bills starting May 5, 2023. Because customers prefer that all changes to their rates occur at the same time, Cal Water proposes to change the effective date of the WRAM surcharges **from April 15, 2023 to May 5, 2023.**⁵

Los Angeles County Region: Effective January 1, 2017, the **Antelope Valley** and **Palos Verdes**Districts were consolidated into the Los Angeles County Region (LA Region) with one revenue requirement. Advice Letter 2408 established different WRAM/MCBA surcharges for Antelope Valley customers and Palos Verdes customers for the reasons described below.

Effective January 1, 2020, D.20-12-007 established a methodology so that the costs of the Palos Verdes Peninsula Water Reliability Project (PVPWRP), the largest capital project in Cal Water's history (at over \$100 million in capital costs) that provides benefits directly to what was formerly the Palos Verdes District, are only applied to customers in that area.⁶

⁵ The additional interest associated with this 20-day delay modifies the total net WRAM/MCBA balances, resulting in slight changes to all surcharges proposed in AL 2477 with two exceptions. The first surcharge for each of the Dominguez and Livermore Districts have not changed as a result of the change in interest due to the hard surcharge cap of 10%. Instead, the second surcharges in those districts have slightly increased.

⁶ The methodology includes calculating a revenue requirement and rates for the entire Los Angeles County Region, and a separate revenue requirement and rates just for the PVPWRP. Antelope Valley customers are then charged just the rates associated with the LA Region. The rate tariffs for Palos Verdes customers, however, consist of the sum of the rates for the LA Region and the rates for the PVPWRP.

D.20-12-007 also established a methodology to calculate WRAM/MCBA surcharges that reflects this split in cost allocation. The surcharges in this advice letter reflect that methodology, described in the settlement adopted in D.20-12-007 as follows:

The WRAM/MCBA surcharges/surcredits will be calculated separately for LAR and the Pipeline. The Pipeline's adopted WRAM revenues will be based on the rate base offset filing, and the "actual" WRAM revenues will be an allocation of total actual WRAM revenues. The resulting surcharges/surcredits for the Pipeline WRAM will then be added to the surcharges/surcredits for the LAR WRAM; the total combined surcharges/surcredits will be assessed solely on Palos Verdes customers ("PV WRAM surcharges/surcredits"). AV customers will receive just the LAR WRAM surcharges/surcredits, which excludes the surcharges/surcredits for the Pipeline WRAM.

Footnote 131: The "actual" revenues associated with the PV Pipeline for the Pipeline WRAM will be calculated as follows: (Actual WRAM revenues from the PV and AV tariffs) multiplied by the ratio of (Adopted Pipeline WRAM revenue) to (Adopted LAR WRAM revenues + Adopted Pipeline WRAM revenues).⁷

Requested Effective Date

Under General Order 96-B, Water Industry Rule 7.3.1, as modified by Resolution W-4664, this is a Tier 1 advice letter. The effectiveness is subject to refund pending the Commission staff's determination that the filing complies with the standard practice and that the surcharge calculations are correct. Cal Water requests an effective date of **May 5, 2023**.

Notice

<u>Customer Notice</u> – Customer notice of Tier 1 advice letters is not required under General Order 96-B, General Rule 7.3.1.

<u>Service List:</u> 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 **April 7, 2023** 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;

⁷ D.20-12-007, Attachment 1 (Settlement Agreement and Motion for Approval), p. 154.

- (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 Water Division within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3rd floor California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102 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 Cal Water at the following address:

Natalie Wales
California Water Service Company
1720 North First Street,
San Jose, California 95112
E-mail: cwsrates@calwater.com

Cities and counties requiring Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division 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 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, and ask for the Rates Department.

CALIFORNIA WATER SERVICE COMPANY

/s/

Melody Singh, Regulatory Program Manager

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

Revised Cancelling Cal. P.U.C. Sheet No. 13168-W Cal. P.U.C. Sheet No. 12940-W

Page 1

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

1. WRAM/MCBA Surcharges and Surcredits

The purpose of the Water Revenue Adjustment Mechanisms (WRAMs) and Modified Cost Balancing Accounts (MCBAs) (together, WRAM/MCBA) is to track water revenues and production-related costs as part of a comprehensive conservation framework adopted by the Commission and implemented in 2008. The net balance in a WRAM/MCBA account represents an over-collection or under-collection of the revenues authorized by the Commission.

Each year, the "net" WRAM/MCBA balance for an area is "amortized," meaning that surcharges or credits are applied to customer bills to bring the balance back to zero.

The "WRAM surcharge" for metered customers is a charge that is applied to each 100 cubic feet (or Ccf) of water usage. The "WRAM credit" is a fixed credit that is applied on a monthly basis, and is identified in the table below as a negative number.

	2021 Balance (AL 2447-A)		(T)	2022 Balance (AL 2477-A)		(T)
District or Region	Surcharge (\$/CCF)	Effective Dates		Surcharge (\$/CCF)	Effective Dates	(T)
Antelope Valley (LA Co. Region)			(D)	\$0.2242	5/05/23 - 12/04/25	(N)
Bakersfield			(D)	\$0.3014	5/05/23 - 1/04/25	(N)
Bay Area Region	\$0.3915	4/15/22 - 10/14/23	(L)	\$0.5648	5/05/23 - 11/04/24	(N)
Bear Gulch			(D)	\$0.5932	5/05/23 - 11/04/24	(N)
Chico	\$0.1029	4/15/22 - 10/14/23	(L)	\$0.2294	5/05/23 - 1/04/25	(N)
Dixon	\$0.4263	4/15/22 - 10/14/23	(L)	\$0.2594 \$0.7091	5/05/23 - 10/14/23 10/15/23 – 7/14/25	(N)
Dominguez	\$0.5040	4/15/22 - 8/14/24	(L)	\$0.0503 \$0.5564	5/05/23 - 5/04/24 8/15/24 - 2/14/26	(N) (N)
East Los Angeles	\$0.6275	4/15/22 - 10/14/23	(L)	\$0.2858	5/05/23 - 11/04/24	(N)
Hermosa-Redondo	\$0.2804	4/15/22 - 10/14/23	(L)	\$0.5742	5/05/23 - 11/04/24	(N)
Kern River Valley	\$2.4069	4/15/21 - 1/14/24*	(T)	\$2.6255	1/15/24 - 9/14/25	(N)
Livermore	\$0.6431	4/15/22 - 4/14/24	(L)	\$0.0559 \$0.6785	5/05/23 - 5/04/24 4/15/24 - 11/14/25	(N) (N)
Los Altos			(D)	\$0.5600	5/05/23 - 12/04/24	(N)
Marysville			(D)	\$0.2801	5/05/23 - 11/04/24	(N)
Oroville			(D)	\$0.2019	5/05/23 - 5/04/24	(N)
Palos Verdes (LA Co. Region)	\$0.1848	4/15/21 - 8/14/23*	(T)	\$0.2716	5/05/23 - 12/04/25	(N)
Salinas Valley Reg.			(D)	\$0.2085	5/05/23 - 11/04/24	(N)
Selma		·	(D)	\$0.3475	5/05/23 - 11/04/24	(N)
Stockton	\$0.5508	4/15/22 - 11/14/23	(L)	\$0.2479	5/05/23 - 1/04/25	(N)
Visalia			(D)	\$0.1235	5/05/23 - 11/04/24	(N)
Westlake			(D)	\$0.2623	5/05/23 - 4/04/26	(N)
Willows			(D)	\$0.6571	5/05/23 - 11/04/24	(N)

^{* 2020} Balance (AL 2408)

(Continued)

(To be inserted by utility) Issued By Advice Letter 2477-A Greg A. Milleman Decision Vice President

(To be inserted by CPUC) Date Filed 04/07/2023 05/05/2023

Effective Resolution (N)

Revised Canceling CPUC Sheet No. 13169-W
CPUC Sheet No. 13166-W

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rage 4		CAF	12343-44			
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Private Fire Protection Ser	vice	A A . 4	42506 144			
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(To be inserted by utility) Advice Letter No. 2477-A Decision No.

Issued by GREG A. MILLEMAN Name Vice President TITLE

(To be inserted by CPUC) Date Filed 04/07/2023 Effective 05/05/2023 Resolution No.

Revised Canceling CPUC Sheet No. 13170-W CPUC Sheet No. 13167-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 No. 2477-A Decision No.

Issued by GREG A. MILLEMAN Name Vice President TITLE

(To be inserted by CPUC) Date Filed 04/07/2023 Effective 05/05/2023 Resolution No.



Antelope Valley District (Los Angeles 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

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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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CALIFORNIA ZATER SERVICE

Selma District

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

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Stockton District

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

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CALIFORNIA ZATER SERVICE

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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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