

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



July 26, 2024

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. 2520, filed on May 17, 2024, regarding Extended Water and Wastewater Arrearage Program.

Enclosed are copies of the following revised tariff sheets, effective May 31, 2024, for the utility's files:

<b>P.U.C. Sheet</b>	
<b>No.</b>	<b>Title of Sheet</b>
13561-W	Schedule No. AS, Additional Surcharges/Surcredits, Page 1
13562-W	Table of Contents, Page 6
13563-W	Table of Contents, Page 1
Cancel	13165-W

Please contact Mahdi Jahami at [MJ4@cpuc.ca.gov](mailto:MJ4@cpuc.ca.gov), if you have any questions.

Thank you.

Enclosures

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

**Advice Letter Cover Sheet**

<b>Utility Name:</b> California Water Service Company All Class A Ratemaking Areas <b>District:</b> (does not include Grand Oaks) <b>CPUC Utility #:</b> U-60-W <b>Advice Letter #:</b> 2520 <b>Tier:</b> <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> Compliance <b>Authorization:</b> G.O. 96-B, Water Industry Rule 7.3.1(5)	<b>Date Mailed to Service List:</b> 05/17/2024  <b>Protest Deadline (20<sup>th</sup> Day):</b> 06/06/2024 <b>Review Deadline (30<sup>th</sup> Day):</b> 06/16/2024 <b>Requested Effective Date:</b> 05/31/2024  <b>Rate Impact:</b> Reduction for some customers  <b>Description:</b> Extended Water and Wastewater Arrearage Program
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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:** Natalie Wales  
**Phone:** (408) 367-8566  
**Email:** [nwales@calwater.com](mailto:nwales@calwater.com)

**Utility Contact:**  
**Phone:**  
**Email:**

**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**

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[ ] APPROVED

[ ] WITHDRAWN

[ ] REJECTED

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

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

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

\_\_\_\_\_



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

May 17, 2024

## Advice Letter No. 2520

To the California Public Utilities Commission:

California Water Service Company (“Cal Water”) respectfully submits this Tier 1 advice letter to request the suspension of certain surcharges currently applied to the bills of residential and commercial customers, and to inform the California Public Utilities Commission (“Commission”) of other activities benefitting residential and commercial customers as a result of funding received from the state’s Extended Arrearage Program.

New/Revised CPUC Sheet No.	Title of Sheet	Schedule No.	Cancelling CPUC Sheet No.
DELETE-W		AS	13165-W
13561-W		AS	13168-W
13562-W	Table of Contents Page 6	TOC 6	13553-W
13563-W	Table of Contents Page 1	TOC 1	13560-W

### Summary

Cal Water received funds from California’s Extended Water and Wastewater Arrearage Payment Program (“Extended Arrearage Program”) to help reduce and/or eliminate arrearages accumulated by certain customers during the pandemic period through the statutory date as set forth by the program. Funding was only available for residential and commercial customers.<sup>1</sup>

On May 31, 2024, Cal Water will apply the funds intended to offset the balances in the following accounts: the Customer Assistance Program (“CAP”) Balancing Account, the Rates Support Fund (“RSF”) Balancing Account, and the Water Revenue Adjustment Mechanism/Modified Cost Balancing Accounts (“WRAM”).

At the same time, Cal Water requests authority to suspend on **May 31, 2024** all WRAM surcharges on Schedule AS (for Additional Surcharges and Surcredits) that are or will be assessed on residential and commercial customers.

### Background

In 2021, the Legislature enacted, and the Governor signed, Assembly Bill 148, which established the Water & Wastewater Arrearage Payment Program (“Arrearage Program”). Administered by the State

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<sup>1</sup> This includes customers categorized in Cal Water’s billing system as being residential, multi-residential, business, and public authority. This excludes customers categorized as industrial, private fire protection, recycled, and agricultural irrigation.



## CALIFORNIA WATER SERVICE COMPANY

Advice Letter 2520, Arrearage Funding and Suspended WRAM Surcharges

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Water Resources Control Board (“Water Board”), the Arrearage Program enabled water suppliers across California pay customer arrearages accrued between March 4, 2020 and June 15, 2021. Funding for the program came from the federal Coronavirus State Fiscal Recovery Fund, authorized by the American Rescue Plan Act. Cal Water secured more than \$20.8 million in assistance for our customers through that original Arrearage Program.

This year, the Legislature enacted and the Governor signed Senate Bill 122, which amended the authorization for the Arrearage Program. Most notably, the eligibility period was extended to also cover the period from June 16, 2021 through December 31, 2022. The Water Board subsequently developed and approved the *California Extended Water and Wastewater Arrearage Payment Program Guidelines* (Extended Arrearage Program) on October 3, 2023.<sup>2</sup> Funding is eligible for arrearages accumulated by its customers between the period June 16, 2021 and December 31, 2022 “designated time period.” The Extended Arrearage Program guidelines contain detailed instructions covering specific eligibility requirements, application requirements, application review, fund disbursements, and allocations to customers.<sup>3</sup>

### Discussion

On November 13, 2023, Cal Water submitted its application for the Extended Arrearage Program relating to the residential, multi-residential, business, and public authority customer classes (hereinafter referred to as “residential and commercial customers”). (The customer classes that are not eligible under the Water Board’s guidelines include industrial, private fire protection, agricultural irrigation, and recycled water.)

In addition to direct reimbursement to customers for arrearages incurred during the designated time period, in the interest of maximizing the value of the Extended Arrearage Program for our customers Cal Water sought reimbursement for amounts tracked in balancing accounts that were incurred during the eligibility period. In compliance with program guidelines, Cal Water provided lists of all of the customers and dollar amounts that qualified for reimbursement.

In early April 2024, Cal Water received a check for the full amount requested for balancing account reimbursement as follows:

Extended Arrearage Program Requests for Balancing Accounts	
<i><b>Purpose</b></i>	<i><b>Amount</b></i>
Customer Assistance Program Reimbursement	\$ 2,231,350.40
Rate Support Fund Reimbursement	\$ 367,358.40
WRAM/MCBA Reimbursement	\$ 66,112,330.39
Total	\$ 68,711,039.19

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<sup>2</sup> [https://www.waterboards.ca.gov/arrearage\\_payment\\_program/](https://www.waterboards.ca.gov/arrearage_payment_program/)

<sup>3</sup> [Resolution No. 2023-0038 \(ca.gov\)](#)



Application for Extended Arrearage Funding:

- WRAM: Of the WRAM balance in each ratemaking area ("RMA") that was incurred by eligible customers during the designated period of time, Cal Water identified the amount those customers still needed to pay in each RMA. The outstanding WRAM balance was divided by the number of eligible customers in the RMA – resulting in the amount each eligible customer would have to pay in the future in the absence of funding from the Extended Arrearage Plan.
- CAP and RSF: During the designated time period, some eligible customers who had arrearages also received CAP<sup>4</sup> and/or RSF<sup>5</sup> benefits during that time period. Lists of customers and the amounts eligible for reimbursement to the CAP and RSF balancing accounts were provided to the Water Board.

Applying Extended Arrearage Funding:

Cal Water must refund any unused dollars received back to the Water Board in accordance with Program Guidelines (Section F.3. – Return of Funds Not Credited to Customers).

- WRAM: Because customers continued to pay WRAM surcharges while Cal Water's application was pending, WRAM balances are now lower than when Cal Water submitted its application. The remaining WRAM balance for each RMA as of March 31, 2024 was divided by the number of eligible customers in the RMA, resulting in the total dollar amount Cal Water needs to recover from each eligible customer.

That dollar amount will appear as a *one-time WRAM surcharge*, and the same amount will be applied as a corresponding *one-time WRAM surcredit*, in the "bill adjustment" section of each eligible customer's bill. Eligible customers will not experience an immediate bill impact; instead, this will allow the funds received from the Extended Arrearage Program to decrease the WRAM balances that eligible customers would have otherwise needed to pay in the future. At this time, Cal Water estimates that the Extended Arrearage Program will result in a \$45,973,502 decrease to the WRAM balances across the company.

- CAP and RSF: Cal Water will apply the funding received for the CAP and RSF directly to the CAP and RSF balancing accounts, respectively. The Extended Arrearage Program Guidelines do not require that reimbursement funds be applied to customer bills when funding is

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<sup>4</sup> CAP customers see a discount on their bills equal to 50% of the monthly service charge for the 5/8 x 3/4" meter in their rate area, so Cal Water identified the customers with arrearages eligible for the program who also received the CAP benefit.

<sup>5</sup> Customers in the Kern River Valley District receive RSF benefits in the form of a discount in the quantity rate for the first 10 CCF of water usage, so Cal Water identified the RSF benefits provided to all Kern River Valley customers with arrearages eligible for the program. Note that, while Dixon and Willows customers also receive an RSF subsidy, those amounts were not included in Cal Water's application for Extended Arrearage Program funds because the subsidy is already embedded in base rates – the annual RSF benefit offsets the revenue requirement, and rates are calculated based on the lower revenue requirement.



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provided for customer assistance programs, so Cal Water will not add these additional reimbursements to customer bills in order to prevent customer confusion.

### *Suspending WRAM Surcharges for Eligible Customers:*

Because the WRAM mechanism ended on December 31, 2022 such that WRAM balances are no longer being incurred, the reimbursement received through the Extended Arrearage Program (and applied to customer bills as described above) should eliminate all WRAM shortfalls attributable to the eligible customers, bringing the balance for those customers to zero. (Note that WRAM balances will remain for customers in the ineligible customer classes – industrial, recycled water, private fire protection, and recycled water.)

The WRAM surcharges for eligible customers should therefore be halted for the foreseeable future, pending confirmation that Cal Water has met the requirements of the program and applied the arrearage funding appropriately. If the state deems the application of funds to the balancing accounts is not in compliance with the guidelines, and the funds must be returned to the state, Cal Water will debit the relevant balancing accounts and resume collection of those balances as approved by the Commission.

Pursuant to G.O. 96-B, Water Industry Rule 7.3.1(5) for decreases in rates, Cal Water accordingly proposes to modify **Tariff Schedule No. AS** to suspend all WRAM surcharges for residential, multi-residential, business, and public authority customers, effective May 31, 2024, until further notice.

### **Requested Effective Date**

This is being submitted pursuant to General Order 96-B, Water Industry Rule 7.3.1(5) as a Tier 1 advice letter with a requested effective date of **May 31, 2024**.

### **Notice**

*Customer Notice* – This is a Tier 1 compliance filing under Water Industry Rule 7.3.1 of General Order 96-B. Water Industry Rule 3.2 indicates that this kind of Tier 1 filing does not require customer notice.

*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 electronically transmitted on **May 17, 2024**, 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:



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- (1) The utility did not properly serve or give notice of the advice letter;
- (2) The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
- (3) The analysis, calculations, or data in the advice letter contain material error or omissions;
- (4) The relief requested in the advice letter is pending before the Commission in a formal proceeding; or
- (5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
- (6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory (provided such a protest may not be made where it would require relitigating a prior order of the Commission.)

A protest shall provide citations or proofs where available to allow staff to properly consider the protest. A response or protest must be made in writing or by electronic mail and must be received by the 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, 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 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](mailto: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**

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CALIFORNIA WATER SERVICE COMPANY

/s/

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Natalie Wales  
Director, Rates

Enclosures

cc: Syreeta Gibbs (Public Advocates Office), [PublicAdvocatesWater@cpuc.ca.gov](mailto:PublicAdvocatesWater@cpuc.ca.gov)



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

Page 1

**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 Industrial, Recycled, Recycled Retrofit, and Agricultural Irrigation metered customers is a charge that is applied to each 100 cubic feet (or Ccf) of water usage. For other customers, the WRAM surcharge is suspended as of May 31, 2024.

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

(D)

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(To be inserted by utility)	Issued By	(To be inserted by CPUC)
Advice Letter <u>2520</u>	<u>Greg Milleman</u>	Date Filed <u>05/17/2024</u>
Decision	<u>Vice President</u>	Effective <u>05/31/2024</u>
	<u>Rates and Regulatory Affairs</u>	Resolution _____

**CALIFORNIA WATER SERVICE COMPANY**

1720 North First Street

San Jose, CA 95112

(408) 367-8200

Revised  
Cancelling

Cal. P.U.C. Sheet No. 13562-W

Cal. P.U.C. Sheet No. 13553-W

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Construction and Temporary Metered Service			
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(Continued)

(To be inserted by utility)		(To be inserted by CPUC)	
Advice Letter	<u>2520</u>	Date Filed	<u>05/17/2024</u>
Decision	<u>Greg Milleman</u> <u>Vice President</u> <u>Rates and Regulatory Affairs</u>	Effective	<u>05/31/2024</u>
		Resolution	

**CALIFORNIA WATER SERVICE COMPANY**

1720 North First Street

San Jose, CA 95112

(408) 367-8200

Revised

Cancelling

Cal. P.U.C. Sheet No. 13563-W

Cal. P.U.C. Sheet No. 13560-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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Page 9	Rate Schedules - District Specific			13551-W
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(Continued)

(To be inserted by utility)		Issued By	(To be inserted by CPUC)	
Advice Letter	<u>2520</u>	<u>Greg Milleman</u>	Date Filed	<u>05/17/2024</u>
Decision		<u>Vice President</u>	Effective	<u>05/31/2024</u>
		<u>Rates and Regulatory Affairs</u>	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 Concil**  
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 Truxton 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  
[clpearce@duanemorris.com](mailto:clpearce@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 Truxton Ave  
Bakersfield, CA 93301



## Bayshore District (Bay Area Region)

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

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

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

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

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

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

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

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

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

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

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

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