





**CALIFORNIA WATER SERVICE COMPANY**

1720 NORTH FIRST STREET  
SAN JOSE, CA 95112 • (408) 367-8200 • F (408) 367-8428

June 5, 2024

**Advice Letter No. 2521**

To the California Public Utilities Commission:

California Water Service Company (“Cal Water”) respectfully submits this Tier 2 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.
DELETE	Additional Surcharges/Surcredits Page 2	AS	13182-W
xxxxx-W	Additional Surcharges/Surcredits Page 2	AS	NEW
xxxxx-W	Table of Contents Page 1	TOC 1	xxxxx-W
xxxxx-W	Table of Contents Page 6	TOC 6	xxxxx-W

**Summary**

This advice letter requests authority to amortize amounts in the Lead Service Line Memorandum Account (“LSL MA”), the Chromium-6 Memorandum Account (“Cr6 MA”), and the General District Balancing Accounts (“District BAs”) for all Class A areas. Cal Water requests an effective date of **August 15, 2024** for the surcharges proposed in this compliance filing, which is being submitted as a **Tier 2** advice letter for reasons discussed below.

**Background**

On March 7, 2024, the Commission issued a final decision in Cal Water’s 2021 General Rate Case, D.24-03-042. The decision ordered Cal Water to amortize several balancing and memo accounts in Ordering Paragraph (“OP”) 20 (emphasis added):

- 20. As requested in Special Request 12, California Water Service Company must file a Tier 1 advice letter consistent with prior authorizations to amortize the December 31, 2022 balances in its: (a) Conservation Expense Balancing Account (CEBA 4); (b) Pension Cost Balancing Account (PCBA 4); (c) Healthcare Cost Balancing Account (HCBA 4); (d) **General District Balancing Account (District BA)**; (e) **Lead Service Line Memorandum Account (LSL MA)**; and (f) **Chromium 6 Memorandum Account (Cr6 MA)**.

The District BA referenced in OP 20 was approved in D.14-08-011 to aggregate the residual balances from memo and balancing accounts that have been amortized into one balancing account (per ratemaking area) so that the aggregate amount can be amortized when certain conditions are met.



The Commission approved the following conditions for this account:

- a. Each ratemaking area will have an associated “general balancing account” (referred to as a “general district balancing account”);
- b. Each general district balancing account may be amortized consistent with the Commission’s standard practices (2% of last adopted revenue requirement), or in a GRC; and
- c. For accounts for which the Commission has authorized a fixed period of amortization, the small residual balances that result from under- or over-amortization may be put into a general district balancing account.<sup>1</sup>

### Discussion

Cal Water seeks to amortize the memorandum (“memo”) and balancing accounts identified in sections (d), (e), and (f) of OP 20. For the reasons discussed in greater detail below, Cal Water requests authority to amortize the balances in those accounts as of **December 31, 2023**, rather than as of **December 31, 2022**, the end date specified in OP 20.

#### Chromium-6 Memo Account Amortization (Preliminary Statement A1)

Chromium is an odorless and tasteless metallic element. Long-term exposure to chromium-6 (“Cr6”), a subset of total chromium, is believed to be carcinogenic and harmful to public health. The Cr6 MA tracks the expenses associated with Cr6 treatment, as well as the capital carrying costs associated with the capital projects needed to treat for Cr6. So far, the Cr6 MA has only tracked costs for treatment projects in the Dixon District, the Salinas Valley Region, and the Willows District. The capital costs associated with these areas, as well as some of the treatment expenses and carrying costs,<sup>2</sup> have already been included in base rates in a previous GRC. For the Salinas Valley Region, Cal Water received approval to amortize outstanding expenses and carrying costs in AL 2503 through surcharges that will begin on September 1, 2024.

In this advice letter, Cal Water requests recovery for outstanding expenses and carrying costs in the Dixon and Willows Districts in the amounts of **\$70,635.77** and **\$90,777.98**, respectively, which includes interest calculated through December 2023. This will result in the following surcharges per CCF for 12 months:

- **\$0.1652 per CCF** for Dixon customers, and
- **\$0.2042 per CCF** for Willows customers.

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<sup>1</sup> D.14-08-011 at 73-74.

<sup>2</sup> In this context, carrying costs refers to the revenue requirement associated with a capital project that has been completed, but has not been authorized to be included in rates. Capital-related carrying costs tracked in a memo account represent the uncollected revenues from the time a project is completed to the time the project is included in rates.



Lead Service Line Memo Account Amortization (Preliminary Statement AX)

The LSL MA was opened on December 13, 2018 through Advice Letter 2331 in order to comply with state Senate Bill 1398 (signed September 17, 2016) requiring an inventory of lead service lines in the distribution system, and a plan for replacement. The LSL MA tracked the incremental costs associated with studying and potentially replacing lead service lines for the benefit of Cal Water's customers. The purpose of the LSL MA has been met, and Cal Water requested amortization of incremental, non-recurring costs for the outside consultant who managed the project.

Cal Water requests recovery of **\$314,124.89**, which includes interest calculated through December 2023, from customers throughout Cal Water's Class A ratemaking areas. This will result in the following surcharges:

- A surcharge of **\$0.0027 per CCF** (less than 1 cent per CCF) for metered customers for 12 months;
- A surcharge of **\$0.06 per month** for flat-rate residential customers in the Bakersfield District for 12 months; and
- A one-time surcharge of **\$1,188.64** for the Travis District, the recovery of which will be addressed in a separate advice letter as referenced below.

General District Balancing Account Amortization (Preliminary Statement AP)

The last time the District BAs were amortized was in AL 2409. The residuals from that amortization are included in this requested amortization. Since then, amortization has been completed for other balancing and memo accounts, for a total of 8 accounts (including the amortization authorized in AL 2409) that are now in the District BAs and can be amortized. Descriptions of the relevant accounts are provided in **Table 1** below.

The total net balance in the accounts as of December 31, 2023 was **\$7,897,494** (including interest as of December 31, 2023) across all ratemaking areas.

- The specific amount Cal Water seeks to amortize in each ratemaking area is listed in **Table 2**. Positive amounts represent under-collections, and negative amounts represent over-collections.
- All surcharges will be applied for a period of **12 months**, with the exception that Cal Water requests that the surcharge for **Kern River Valley** be amortized over **24 months** in order to mitigate the customer impact of the surcharge.
- Note that surcharge recovery for the **Travis District** will be addressed in a separate advice letter.



**Table 1: Description of Accounts**

Preliminary Statement	Account Name	Description
(none)	Old Interim Rates Surcharges	Cal Water implemented “interim rate surcharges” to effectuate the transition from one Cal Water rate case per year, to a consolidated rate case that started with the 2009 GRC. The delay in the GRCs for one group of districts was handled by allowing a surcharge for those districts for a set time period. The residual amounts from those amortizations are not part of a formally authorized memo or balancing account, but were authorized for a second amortization period in D.16-12-042, Exhibit A (Settlement) at 64. See also A.15-07-015, General Report at 36-37.
Z3	Conservation Expense One-Way Balancing Account (CEBA3)	One-way balancing account that tracks the difference between actual conservation expenses and authorized conservation amounts included in rates in 2017-2019 (2015 GRC period).
AA3	Pension Cost Balancing Account (PCBA3)	Two-way balancing account that tracks the difference between actual pension costs and pension costs adopted in the 2015 GRC for the period of 2017-2019. If actual pension costs exceeds adopted pension costs at the end of three year period, Cal Water will file for recovery. If actual costs are lower than adopted costs at the end of three year period, Cal Water will be liable to refund the balance to ratepayers.
AB3	Health Care Balancing Account (HCBA3)	Two-way balancing account that tracks the difference between actual healthcare costs and healthcare costs adopted in the 2015 GRC for the period of 2017-2019. True-up is only for 85% of the difference between actual and adopted costs.
AL1	Drought Memo Account 1	The purpose of this account is to track costs and penalties associated with implementation of Rule 14.1 and Schedule 14.1 consistent with Res. W-4976 in which the Commission adopted Drought Procedures.
AP	General District Balancing Accounts	Tracks small sums (negative and positive) associated with a ratemaking district so that they can be aggregated, and the net amount addressed as a group when the sums grow larger.
AV	2018 Tax Accounting Memo Account	Track the impact of the 2018 Tax Cuts and Jobs Act (“TJCA”) on the revenue requirements of Cal Water’s regulated ratemaking areas.
AW	Cost of Capital Interim Rate Memo Account	Track the difference between current rates, and rates based upon the new cost of capital adopted by the Commission in D.18-03-35, as if the new cost of capital had been in effect beginning January 1, 2018.



**CALIFORNIA WATER SERVICE COMPANY**

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**Table 2 – Amounts per Ratemaking Area per Balancing or Memorandum Account**

Dept	District/ Ratemaking Area	Old Interim BAMA	Conser- vation-Z3	Pension PCBA-AA3	Healthcare HCBA-AB3	Drought DRMA-AL1	Gen Dist BA -AP	2018 GRC IRMA18-AZ	COC&TCJA (AW-AV)	Total
170	Bay Area Region	32,475	(644)	249,594	(10,847)	6,809	71,083	1,068,785	54,061	\$ 1,471,315
101	Bakersfield	-	(4,288)	358,940	(25,157)	66,875	96,618	413,037	(97,152)	\$ 808,873
102	Bear Gulch	(5,365)	(7,211)	52,748	(7,414)	8,997	847	17,658	(22,994)	\$ 37,266
104	Chico	-	1,901	190,958	(6,034)	14,157	13,747	100,679	2,740	\$ 318,147
128	Dominguez	(10,494)	(271)	256,328	(7,322)	91,469	7,418	186,669	(11,530)	\$ 512,268
105	Dixon	-	2,852	17,262	657	2,525	13,802	-	1,309	\$ 38,409
106	East Los Angeles	-	(947)	202,633	(9,047)	28,067	32,699	(6,335)	(14,684)	\$ 232,385
108	Hermosa Redondo	-	3,333	51,230	(3,952)	11,955	9,852	186,519	(3,988)	\$ 254,949
134	Kern River Valley	-	(2,085)	81,564	(1,871)	11,880	39,392	33,988	(4,234)	\$ 158,634
110	Livermore	-	4,340	118,643	(2,913)	7,573	26,950	332,140	(154)	\$ 486,579
111	Los Altos	-	(1,820)	129,223	(5,718)	4,767	34,501	355,888	(11,388)	\$ 505,453
172	Los Angeles Region	21,596	225	14,375	(4,734)	22,967	(6,974)	1,211,845	(3,836)	\$ 1,255,463
112	Marysville	11,455	(3,317)	27,194	(1,877)	1,660	(1,757)	3,913	(9,518)	\$ 27,751
113	Oroville	-	248	29,345	(2,991)	1,775	(721)	(23,085)	129	\$ 4,699
171	Salinas Valley Region	-	(5,460)	(4,218)	(11,052)	12,549	(5,273)	(40,571)	(20,583)	\$ (74,609)
117	Selma	-	(1,923)	43,122	(2,617)	8,495	15,359	9,899	(2,893)	\$ 69,444
119	Stockton	-	156	299,902	(12,725)	32,876	59,117	816,430	(11,757)	\$ 1,183,998
157	Travis	-	-	-	-	-	-	275,127	-	\$ 275,127
120	Visalia	-	(815)	126,499	(12,691)	11,116	7,841	(368)	(10,704)	\$ 120,877
123	Westlake	-	996	100,661	(2,200)	10,742	18,861	54,365	(3,353)	\$ 180,072
121	Willows	-	(101)	24,668	(1,127)	30	8,166	-	(1,240)	\$ 30,395
<b>Total</b>		<b>49,666</b>	<b>(14,832)</b>	<b>2,370,668</b>	<b>(131,632)</b>	<b>357,285</b>	<b>441,528</b>	<b>4,996,581</b>	<b>(171,770)</b>	<b>\$ 7,897,494</b>



### Amortization of Balances as of December 31, 2023

In its 2021 GRC Application, Cal Water specifically requested amortization of amounts in qualifying balancing and memo accounts *as of December 31, 2022* because a decision in that case was to have been approved in time for the Test Year start of January 1, 2023. Since a final decision was not adopted until March 7, 2024, Cal Water requests recovery of balances through *December 31, 2023*.

First, Cal Water notes that the balancing and memo accounts at issue in this advice letter are not controversial. They have not been the subject of any dispute with the Public Advocates Office. In two cases, this request is in line with past practices. In the case of the requested Cr6 amortization in the Dixon and Willows Districts, the Water Division recently approved cost recovery in AL 2503 for costs of the same nature, but for the Salinas Valley Region. Similarly, the District BAs were most recently amortized in AL 2409 for residuals associated with *16 balancing and memo accounts*, as compared to the residuals of *8 accounts* proposed here.

More importantly, interest at the 90-day Commercial Paper rate applies to all balances in these accounts. Because almost all amounts consist of under-collections to be recovered from customers, calculating interest as of a more recent date benefits customers by minimizing the amounts subject to future interest, which is applicable as long as the accounts are open.

Because this request differs from OP 20 of D.24-03-042, Cal Water does not submit this request as a Tier 1 advice letter, but instead submits it as a **Tier 2 advice letter** to ensure Water Division conducts its review and the surcharges are approved prior to going into effect.

### Exception for the Travis District

Total surcharges of \$275,127 for the District BA and \$1,188.64 for the LSL MA are applicable to Travis Air Force Base, the sole customer of the Travis District. These will be addressed through a separate advice letter upon agreement about the appropriate timing of and method for recovery.

### Requested Effective Date

Under General Order 96-B, Water Industry Rule 7.3.1, and D.24-03-042, this compliance advice letter can be amortized as a Tier 1 filing. Instead, for the reasons discussed above, Cal Water is submitting this as a Tier 2 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 **August 15, 2024**.

### Notice

Customer Notice – Customer notice of a Compliance Advice Letters is not required under General Order 96-B, Water Industry Rule 3.2.

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 **June 5, 2024** to competing and adjacent utilities and other utilities or interested parties having requested such notification, including the Local Agency Formation Commission (LAFCO). **Please note that this advice letter will only be distributed electronically.**



### **Response or Protest**

Anyone may respond to or protest this advice letter. When submitting a response or protest, please include the utility name and advice letter number in the subject line. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter. A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

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

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



**CALIFORNIA WATER SERVICE COMPANY**

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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/

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Natalie Wales,  
Director, Rates

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

Schedule No. AS

**Additional Surcharges/Surcredits**

**2. Chromium-6 Treatment, Lead Service Line Inventories, and the General Balancing Account**

(N)

In Decision 24-03-042, Commission authorized Cal Water to amortize the balances in the following regulatory balancing or memo accounts by applying surcharges or credits to customers' bills.

In the "Chromium-6 Treatment Account," Cal Water tracked the costs spent to treat water for the odorless and tasteless metallic element, chromium-6, long-term exposure to which is believed to be carcinogenic and harmful to public health. As of December 31, 2023, the costs to be recovered are \$70,636 for the Dixon District and \$90,778 for the Willows District.

In the "Lead Service Line Account," Cal Water tracked the costs spent to inventory and plan for the replacement of water lines that may contain lead, another contaminant harmful to public health. The amount to be recovered across all ratemaking areas was \$314,125 as of December 31, 2023.

The "General Balancing Account" for each ratemaking area tracks small dollar amounts left over after other accounts have been amortized, and aggregates them for later amortization when the balances grow large. As of December 31, 2023, the residual balances left over after nine (9) accounts had been amortized totaled a net amount of \$7,897,494 to be recovered from ratemaking areas as shown below.

Effective August 15, 2024 – August 14, 2025 (unless otherwise indicated)						
\$ Surcharge per 100 Cubic Feet (CCF)/month (unless otherwise indicated)						
Area	General Balancing Account		Lead Service Line Account		Chromium-6 Treat. Acct.	
Bay Area Region	\$0.1764	(N)	\$0.0027	(N)		(N)
Bakersfield	\$0.0374	(N)	\$0.0027	(N)		(N)
Bakersfield Flat	\$0.83/month surcharge	(N)	\$0.06/month surcharge	(N)		(N)
Bear Gulch	\$0.0078	(N)	\$0.0027	(N)		(N)
Dixon	\$0.0898	(N)	\$0.0027	(N)	\$0.1652	(N)
East Los Angeles	\$0.0430	(N)	\$0.0027	(N)		(N)
Kern River Valley	\$0.4387 (Eff 8/15/24 – 8/14/26)	(N)	\$0.0027	(N)		(N)
Livermore	\$0.1401	(N)	\$0.0027	(N)		(N)
Los Altos	\$0.1051	(N)	\$0.0027	(N)		(N)
Los Angeles Region	\$0.1812	(N)	\$0.0027	(N)		(N)
Marysville	\$0.0328	(N)	\$0.0027	(N)		(N)
North Valley Region	\$0.0345	(N)	\$0.0027	(N)		(N)
Salinas Valley Region	\$ (0.20)/month credit	(N)	\$0.0027	(N)		(N)
Selma	\$0.0468	(N)	\$0.0027	(N)		(N)
Stockton	\$0.1343	(N)	\$0.0027	(N)		(N)
South Bay Region	\$0.0437	(N)	\$0.0027	(N)		(N)
Visalia	\$0.0097	(N)	\$0.0027	(N)		(N)
Westlake	\$0.0670	(N)	\$0.0027	(N)		(N)
Willows	\$0.0684	(N)	\$0.0027	(N)	\$0.2042	(N)

(N)

(To be inserted by utility)  
 Advice Letter 2521  
 Decision 24-03-042

Issued By  
Greg Milleman  
Vice President  
Rates and Regulatory Affairs

(To be inserted by CPUC)  
 Date Filed \_\_\_\_\_  
 Effective \_\_\_\_\_  
 Resolution \_\_\_\_\_

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(To be inserted by utility)	Issued By	(To be inserted by CPUC)
Advice Letter <u>2521</u>	<u>Greg Milleman</u>	Date Filed _____
Decision <u>D.24-03-042</u>	<u>Vice President</u>	Effective _____
	<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. XXXXX-W  
 Cal. P.U.C. Sheet No. 13556-W

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Advice Letter <u>2521</u>	<u>Greg Milleman</u>	Date Filed _____
Decision <u>D.24-03-042</u>	<u>Vice President</u>	Effective _____
	<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 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**  
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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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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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## Los Altos District

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

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

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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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## Palos Verdes District (Los Angeles County Region)

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

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## Redwood Valley District (Bay Area Region)

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

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

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

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

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## Travis District

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

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

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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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