

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



April 22, 2025

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. 2490-A (Supplement to Advice Letter No. 2490), filed on March 10, 2025, regarding amortization of June 14, 2021 - December 31, 2022 expenses in the Drought Memo Account.

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

P.U.C. Sheet	
No.	Title of Sheet
13774-W	Schedule AS, Page 7
13775-W	Table of Contents, Page 6
13776-W	Table of Contents, Page 1

Please contact Wilson Tsai at WT1@cpuc.ca.gov, if you have any questions.

Thank you.

Enclosures

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

Advice Letter Cover Sheet

Utility Name: California Water Service Company All Class A Ratemaking Areas (except Travis District: and excludes Grand Oaks)	Date Mailed to Service List: 03/10/25
CPUC Utility #: U-60-W	Protest Deadline (20th Day): 03/30/25
Advice Letter #: 2490-A	Review Deadline (30th Day): 04/09/25
Tier: X1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> Compliance	Requested Effective Date: 04/01/25
Authorization: General Order 96-B, Water Industry Rule 7.3.3(7)	
Description: Amortization of June 14, 2021 - December 31, 2022 expenses in the Drought Memo Account.	Rate Impact: Varies

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: Susan Lieu
Phone: 310-257-1483
Email: slieu@calwater.com

Utility Contact: Natalie Wales
Phone: 408-367-8566
Email: Nwales@calwater.com

DWA Contact: Tariff Unit
Phone: (415) 703-1133
Email: 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[] WITHDRAWN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

March 10, 2025

Advice Letter No. 2490-A

To the California Public Utilities Commission:

California Water Service Company ("Cal Water") respectfully submits this Tier 1 advice letter for filing the following changes in its tariff schedules applicable to all Class A ratemaking areas except Travis (and this excludes Grand Oaks).

New/Revised C.P.U.C. Sheet No.	Title of Sheet	Schedule No.	Cancelling C.P.U.C. Sheet No.
xxxxx-W	Schedule AS, Page 7	Schedule No. AS	xxxxx-W
xxxxx-W	Table of Contents, Page 6		xxxxx-W
xxxxx-W	Table of Contents, Page 1		xxxxx-W

Summary

This **supplement** to Advice Letter 2490 requests authority to modify the start date from January 1, 2024 to **April 1, 2025** for the application of surcharges requested by Cal Water in AL 2490 and approved by the Commission in Resolution ("Res") W-5285.

AL 2490 requested authority to amortize expenses from June 14, 2021 to December 31, 2022 tracked in the Drought Memorandum Account ("DRMA2") in the amount of \$1,393,447. Cal Water requested approval to apply a quantity-based surcharge that varies by ratemaking area per CCF on customers in its Class A ratemaking areas (except for Travis).

Background

- April 4, 2021, May 5, 2021, July 8, 2021, and October 19, 2021 – Governor Gavin Newsom issued a drought declaration for all California counties through multiple State of Emergency Proclamations.¹
- June 14, 2021 – In Advice Letter 2412, Cal Water proposed modifications to its current Rule 14.1 and Schedule 14.1 with an effective date of July 14, 2021.

¹ <https://www.gov.ca.gov/wp-content/uploads/2021/10/10.19.21-Drought-SOE-1.pdf>.
<https://www.gov.ca.gov/wp-content/uploads/2021/07/7.8.21-Conservation-EO-N-10-21.pdf>.
<https://www.gov.ca.gov/wp-content/uploads/2021/05/5.10.2021-Drought-Proclamation.pdf>.
<https://www.gov.ca.gov/wp-content/uploads/2021/04/4.21.21-Emergency-Proclamation-1.pdf>.



- June 14, 2021 – In Advice Letter 2413, Cal Water requested authority to add Preliminary Statement AL2, titled “Drought Memorandum Account 2 (“DRMA2”)” to its tariff to track incremental costs related to implementing the requirements of Rule 14.1 and Schedule 14.1. The Commission approved AL 2413 on August 24, 2021, with an effective date of June 14, 2021.
- October 20, 2021 – In Advice Letter 2426, Cal Water requested activation of Stage 2 in the Bakersfield, Kern River Valley, Livermore, Los Altos, Redwood Valley, and Visalia service areas, effective December 14, 2021.
- March 15, 2022 – In Advice Letter 2446, Cal Water requested activation of Stage 2 in the Bayshore, Bear Gulch, Dominguez, East Los Angeles, Hermosa-Redondo, Palos Verdes and Westlake service areas, effective April 15, 2022.
- March 28, 2022 – Governor Newsom issued Executive Order N-7-22 calling on water suppliers to implement Level 2 of their Water Shortage Contingency Plans and directing the State Water Resources Control Board to consider a number of additional actions to combat the drought.²
- April 22, 2022 – In Advice Letter 2448, Cal Water requested activation of Stage 2 in the Chico, Marysville, Oroville, Stockton and Willows Districts, effective of May 22, 2022.
- May 9, 2022 – In Advice Letter 2452, Cal Water requested activation of Stage 2 in the Antelope Valley, Dixon, King City, Salinas, and Selma service areas, effective June 10, 2022.

Discussion

Building on lessons learned in the previous drought, Cal Water’s drought response approach in 2021 took a “customer-first” approach to the drought in order to meet state goals and requirements while strengthening relationships with customers and communities. Effective June 14, 2021, the Drought Memorandum Account 2 was created to track all expenses related to the drought as Cal Water began drought-specific conservation outreach in line with the declared State of Emergency.

From June 14, 2021 to December 31, 2022, Cal Water spent roughly \$2M in an effort to meet the statewide goals and requirements.³ These costs included ongoing drought communications and advertising, increased conservation activity, and payroll needs associated for additional temporary employees to address drought response.

The focus throughout the drought response initiative has been on working with our customers to meet the water reduction targets by district. This included marketing our multiple conservation programs (conservation kits, rebates, water evaluation programs, turf replacement, bathroom

² <https://www.gov.ca.gov/wp-content/uploads/2022/03/March-2022-Drought-EO.pdf>.

³ Of this amount, and as discussed below, Cal Water has identified incremental drought-related costs that are appropriate for recovery through the DRMA2, and is requesting a recovery amount for this period that is lower than \$2 million.



fixture replacement, and high efficiency toilet programs), and creating positions to support additional conservation activity, as well as ensuring compliance with water-use restrictions. Additional focus was given to districts not meeting reductions targets and those with specific supply challenges.

Cal Water's drought efforts have resulted in much success. For the period of July 2021 through December 2022, Cal Water customers saved more than 39,266 acre feet of water compared to the 2020 baseline period. This equates to more than 12 billion gallons of water. During this period, Cal Water provided 8,484 conservation kits to customers, and provided rebates for 10,316 high-efficiency sprinkler nozzles, 1,297 smart irrigation controllers, and 2,481 indoor high-efficiency devices such as clothes washer and toilets. We also provided rebates for the conversion of 653,421 square feet of outdoor land to California-friendly landscaping, and the conversion of 486,053 square feet of spray irrigation to drip irrigation. Our Smart Landscape Tune-Up Program completed 1,613 site evaluations, resulting in the installation of 24,471 high-efficiency sprinklers and 820 smart irrigation controllers.

Incremental Drought Expenses

Cal Water requests recovery for drought expenses from June 14, 2021 to December 31, 2022 in the amount of \$1,393,447. On **Attachment A** to this advice letter, this sum is broken down into categories. The workpapers for this advice letter provide details on how Cal Water determined that these costs are incremental to authorized water rates, and appropriately recovered through the DRMA2. Any costs approved for recovery through the DRMA2 that are unlikely to be recurring in the future will be adjusted out of historical averages as appropriate for the purposes of forecasting expenses in future GRCs.

Payroll Costs

The payroll costs that Cal Water has identified as recoverable through the DMRA2 consist solely of costs associated with temporary employees dedicated to drought activities.

Non-Payroll Costs

Cal Water has identified \$855,079 in recoverable drought expenses unrelated to payroll.

Service Charges Received Used to Offset Expense Recovery

During 2021 and 2022, Butte County and a business called Califia Farms had need of emergency water from Cal Water on several occasions in the Chico and Bakersfield Districts, respectively. The water was provided pursuant to contracts with Cal Water that were submitted via advice letter for Commission review. The Water Division directed Cal Water to track the service charge revenues received under the contracts in order to offset any expenses requested through the DRMA2.⁴ The

⁴https://www.calwater.com/docs/rates/advice_letters/bk/2424_Califia_Farms_Emergency_Water_Service_20210930_AN.pdf, page 2. Quantity revenues were tracked in Cal Water's full decoupling mechanism, the Water Revenue



workpapers for this advice letter provide details on the service charges received from the emergency water use contracts, and these amounts are used to offset the expenses proposed for recovery through the DRMA2. In Bakersfield, recoverable expenses of \$62.67 were offset. In Chico, recoverable expenses of \$1,130.63 were offset.

Future DRMA Amortization

While Cal Water continued to incur drought expenses in 2023, Cal Water is only seeking recovery of expenses incurred up through the end of 2022. Commission-approved expenses are adopted for Cal Water on a calendar year basis. Because Cal Water compares actual (recorded) expenses to adopted expenses in many areas to help determine whether they are incremental, such an analysis is most appropriately completed after the end of the calendar year. Therefore, there are costs tracked in the DRMA2 for which Cal Water is not seeking recovery at this time that will be addressed in a subsequent advice letter.

Supplement to AL 2490

On January 30, 2025, the Commission approved Res. W-5285 granting the relief requested by Cal Water in AL 2490, and changing the start date for the 12-month surcharges from January 1, 2024 (as originally requested in AL 2490) to April 1, 2025.

Requested Effective Date

In compliance with Res. W-5285, this is a Tier 1 compliance filing with a requested effective date of April 1, 2025.

Notice

Customer Notice: Notice of this request has been provided via legal notice consistent with General Order 96-B, General Rule 4.2 and Water Industry Rule 3.1.

Service List: In accordance with General Order 96-B, General Rules 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 10, 2025**, to competing and adjacent utilities and other utilities or interested parties having requested such notification. ***Please note that this advice letter will only be distributed electronically to the Water Division and the attached service lists.***

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

Adjustment Mechanism/Modified Cost Balancing Account, and therefore automatically decrease the balances in the relevant district accounts.



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, 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/

Susan Lieu

Rates Analyst

Enclosures

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

ATTACHMENT A

Category	Total	Total Recoverable	Total Unrecoverable	Category Includes:
Postage	\$81,605	\$0	\$81,605	Postage for drought mailings (Invoiced to Cal Water)
Conservation Expense	\$998,426	\$680,151	\$318,275	Drought advertising and design, conservation expenses ("drought supplemental campaign, lawn signs, rebate account, and clear results")
Miscellaneous Expense	\$10,180	\$10,180	\$0	Equipment/ supplies for drought public meetings and expenses not included in other categories
Customer Records-Supplies	\$25,377	\$25,377	\$0	Office supplies and drought mailers
Rents	\$12,824	\$0	\$12,824	Rents can be properly included in utility operating expenses when payable by the Company
Other Outside Services	\$0	\$36,367	\$232,518	Consulting services for drought (Moved to drought expense allocation)
Institutional Advertising	\$244,383			Drought advertising and design, conservation expenses ("Drought Infomercial Marketing")
Postage	\$2,774			Postage for drought mailings (Purchased via P-card)
Stationery & Printng	\$10,900			Printing material for drought
Office Supplies	\$0			Supplies, equipment, and stock photos for drought (Moved to drought expense allocation)
General Corporate Expense	\$10,828			Equipment/ supplies for drought public meetings and WSCP Stage-2 publications (Purchased via P-card)
Miscellaneous Expenses	\$86,600	\$86,600	\$0	Expenses not included in other categories
Drought Expense Allocation	\$555,965	\$555,965	\$0	Drought expense allocation: Consulting services for drought and drought advertising
Emergency Water Use Revenue Offset	\$0	(\$1,193)	\$0	Service charges received used to offset expense recovery
Grand Total	\$2,039,863	\$1,393,447	\$645,223	

Schedule No. AS
Additional Surcharges/Surcredits

Page 7

(N)

(N)

6. Recovery for 2021-2022 Drought Expenses

(N)

The following surcharges will be applied to all regulated customers, excluding Grand Oaks and Travis, for a period of twelve months starting April 1, 2025 in order to recover expenses incurred for drought activities from June 14, 2021 until December 31, 2022 tracked in the Drought Memorandum Account 2 (DRMA2).

Ratemaking Area	Surcharge (\$/CCF)	Effective Dates
Bakersfield	\$0.0056	4/1/25 – 3/31/26
Bakersfield Flat	\$0.15 / Mo.	
Bay Area Region	\$0.0194	
Bear Gulch	\$0.0118	
Chico	\$0.0368	
Dixon	\$0.0086	
Dominguez	\$0.0033	
East Los Angeles	\$0.0054	
Hermosa-Redondo	\$0.0057	
Kern River Valley	\$0.0348	
Livermore	\$0.0108	
Los Altos	\$0.0106	
Los Angeles County Region	\$0.0068	
Marysville	\$0.0058	
Oroville	\$0.0052	
Salinas Valley Region	\$0.0050	
Selma	\$0.0037	
Stockton	\$0.0047	
Visalia	\$0.0031	
Westlake	\$0.0777	
Willows	\$0.0169	

(N)

(To be inserted by utility)

Advice Letter 2490-A

Decision

Issued By

Greg MillemanVice PresidentRates and Regulatory Affairs

(To be inserted by CPUC)

Date Filed 03/10/2025Effective 04/01/2025

Resolution

CALIFORNIA WATER SERVICE COMPANY

1720 North First Street

San Jose, CA 95112

(408) 367-8200

Revised
Cancelling

Cal. P.U.C. Sheet No. 13775-W

Cal. P.U.C. Sheet No. 13768-W

Table of Contents
Rate Schedules

Page 6

Sheet Subject MatterSchedule No.CPUC Sheet No.**ALL DISTRICTS:**

Service to Company Employees

ED-1

5168-W

Surcharge to Fund Public Utilities Commission
Reimbursement Fee

UF

13326-W

Rate Support Fund (RSF)

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RSF

13545-W

Page 2

RSF

13546-W

Customer Assistance Program (CAP)

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CAP

13009-W

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CAP

12547-W

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CAP

13767-W

Page 4

CAP

12549-W

Additional Surcharges/Surcredits

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AS

13561-W

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AS

13706-W

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AS

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AS

13596-W

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AS

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AS

13605-W

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AS

13774-W

(N)

Fire Flow Testing Charge

FF

8597-W

Construction and Temporary Metered Service

Page 1

9-CM

11514-W

Page 2

9-CM

11513-W

Private Fire Protection Service

Page 1

AA-4

13544-W

Page 2

AA-4

11630-W

(Continued)

(To be inserted by utility)

Advice Letter 2490-A

Decision

Issued By

Greg MillemanVice PresidentRates and Regulatory Affairs

(To be inserted by CPUC)

Date Filed 03/10/2025Effective 04/01/2025

Resolution

CALIFORNIA WATER SERVICE COMPANY

1720 North First Street

San Jose, CA 95112

(408) 367-8200

Revised
Cancelling

Cal. P.U.C. Sheet No. 13776-W

Cal. P.U.C. Sheet No. 13773-W

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				13288-W
Table of Contents				
Page 1	Table of Contents			13776-W (C)
Page 2	Preliminary Statements			13574-W
Page 3	Preliminary Statements			13573-W
Page 4	Preliminary Statements			13572-W
Page 5	Preliminary Statements			13762-W
Page 6	Rate Schedules - All Districts			13775-W (C)
Page 7	Rate Schedules - All Districts			13305-W
Page 8	Rate Schedules - District Specific			13761-W
Page 9	Rate Schedules - District Specific			13760-W
Page 10	Rate Schedules - District Specific			13759-W
Page 11	Rate Schedules - District Specific			13758-W
Page 12	Rate Schedules - District Specific			13772-W
Page 13	Rate Schedules - District Specific			13756-W
Page 14	Service Area Maps			13609-W
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Page 16	Service Area Maps			13582-W
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Page 18	Rules			13294-W
Page 19	Rules			13293-W
Page 20	Rules			13292-W
Page 21	Sample Forms			13291-W
Page 22	Sample Forms			13290-W
Page 23	Sample Forms			13559-W

(Continued)

(To be inserted by utility)		Issued By	(To be inserted by CPUC)	
Advice Letter	<u>2490-A</u>	<u>Greg Milleman</u>	Date Filed	<u>03/10/2025</u>
Decision		<u>Vice President</u>	Effective	<u>04/01/2025</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

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JOSEPH S. LUCIDO
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ONLY FOR SERVICE AREA MAPS:



Bakersfield District

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

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ONLY FOR SERVICE AREA MAPS:

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Bayshore District (Bay Area Region)

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

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Bayshore District (Bay Area Region)

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

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Mid Peninsula Water District

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Belmont, CA 94002

rramirez@midpeninsulawater.org

KAT WUELFING, ASST. GENERAL
MANAGER

Mid Peninsula Water District

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TONY BRENNER, WATER DIVISION
SUPERVISOR

Town of Hillsborough

1600 Floribunda Ave

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tbrenner@hillsborough.net

RACHEL JONES

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ONLY FOR SERVICE AREA MAPS:

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rbartoli@smcgov.org



Bear Gulch District

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

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ENGINEER

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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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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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