



September 02, 2025

Advice Letter No. 2563

To the California Public Utilities Commission:

California Water Service Company (“Cal Water”) respectfully submits this Tier 3 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 8	Schedule No. AS	New
XXXXX-W	Table of Contents, Page 6		XXXXX-W
XXXXX-W	Table of Contents, Page 1		XXXXX-W

Summary

This advice letter requests authority to amortize expenses from January 2023 through August 2024 tracked in the Drought Memorandum Account (“DRMA2”) in the amount of \$1,909,712. Cal Water requests approval to apply a quantity-based surcharge per CCF that varies by its Class A ratemaking areas (except none for Travis).

In this advice letter, Cal Water provides July 1, 2026 as a proposed effective date, however Cal Water proposes that the actual effective date depend on the date of a final Commission resolution and the next date on which other components on customers’ bills may be changing.¹

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.²

¹ Note that surcharges and surcredits must be known and final at least one month before their effective date to enable Cal Water to conduct the internal billing processes established to comply with Sarbanes-Oxley requirements.

² <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 2412, Cal Water proposed modifications to its current Rule 14.1 and Schedule 14.1 with an effective date of July 14, 2021.
- 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.³
- 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.
- July 28, 2023 – In Advice Letter 2490, Cal Water requested amortization of DRMA2 expenses from June 14, 2021 to December 31, 2022.
- September 4, 2024 - the Governor issued a termination proclamation and ended the drought in some California counties.

Discussion

Building on lessons learned in the previous drought, Cal Water’s drought response approach took a “customer-first” approach 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 January 2023 through August 2024 (for the period before the termination proclamation was issued on September 4, 2024 for several areas), Cal Water spent roughly \$2.0 million in an effort to

³ <https://www.gov.ca.gov/wp-content/uploads/2022/03/March-2022-Drought-EO.pdf>.



meet the statewide goals and requirements.⁴ These costs included ongoing drought communications and advertising, increased conservation activity, and consulting needs to address the 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 fixture replacement, and high efficiency toilet programs), and creating positions to support additional conservation activity, as well as ensuring compliance with water-use restrictions.

Incremental Drought Expenses

Cal Water requests recovery in the amount of \$1,909,712 (see Table 1 for breakout by district) for recoverable drought expenses of \$1,726,544 from the period of January 2023 to August 2024 and \$183,168 in interest from January 2023 to the date of this filing. In **Attachment A** to this advice letter, the expense sum is broken down into the categories of expenditure. 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.

Service Charges Received Used to Offset Expense Recovery

During 2024, Butte County had need of emergency water from Cal Water on several occasions in the North Valley Region. 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. The 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 the North Valley Region, revenues of \$1,996.03 therefore offset recoverable expenses.

Interest

As mentioned above, interest on the outstanding balances is included from January 2023 through August 2025. Upon adoption of a resolution approving any surcharges, Cal Water requests being allowed to true up future interest incurred from September 2025 forward in the compliance filing implementing the resolution. This ensures the company is fairly compensated for the carrying cost of its outstanding balance. This memo account will remain open while amortization occurs and continue to incur interest, however including interest-to-date is in the benefit of customers, who would otherwise end up paying additional *unnecessary* interest costs.

⁴ 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.



Table 1

DRMA2 Amortization Balances

Tariff Area	Amount to Amortize
Bakersfield	\$181,370
Bay Area Region (BAR)	\$101,840
Bear Gulch	\$60,428
Dixon	\$21,264
East Los Angeles	\$56,023
Kern River Valley	\$13,896
Livermore	\$84,074
Los Altos	\$42,965
Los Angeles County Region (LAR)	\$52,467
Marysville	\$7,117
North Valley Region (NVR)	\$665,445
Salinas Valley Region (SVR)	\$56,108
Selma	\$10,644
South Bay Region (SBR)	\$111,268
Stockton	\$76,199
Visalia	\$323,191
Westlake	\$37,472
Willows	\$7,940

Typical Residential Bill Impact

Table 2 below shows the monthly impact on the typical residential customer bill for the DRMA balances included in this advice letter.

Table 2

Typical Residential Bill Impact by Rate Area

Tariff Area	Median Usage	Gallons	Bill as of July 1, 2025	Bill including Surcharge	\$ Difference	% Difference
Bakersfield	12	8,976	\$50.59	\$50.69	\$0.10	0.2%
Bay Area Region	6	4,488	\$53.05	\$53.12	\$0.07	0.1%
BAR - Coast Springs	1	748	\$34.57	\$34.58	\$0.01	0.0%
Bear Gulch	8	5,984	\$80.23	\$80.33	\$0.10	0.1%
Dixon	7	5,236	\$74.27	\$74.62	\$0.35	0.5%
East LA	8	5,984	\$60.59	\$60.67	\$0.08	0.1%
Kern River Valley	3	2,244	\$74.39	\$74.62	\$0.23	0.3%



CALIFORNIA WATER SERVICE COMPANY

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Livermore	8	5,984	\$57.74	\$57.94	\$0.20	0.3%
Los Altos	9	6,732	\$87.45	\$87.53	\$0.08	0.1%
LAR - Antelope Valley	7	5,236	\$48.30	\$48.35	\$0.05	0.1%
LAR - Palos Verdes	11	8,228	\$98.26	\$98.34	\$0.08	0.1%
Marysville	7	5,236	\$49.55	\$49.61	\$0.06	0.1%
NVR - Chico	8	5,984	\$33.25	\$33.82	\$0.57	1.7%
NVR - Oroville	6	4,488	\$44.72	\$45.15	\$0.43	1.0%
Salinas Valley Region	7	5,236	\$47.19	\$47.25	\$0.06	0.1%
Selma	12	8,976	\$44.44	\$44.53	\$0.09	0.2%
SBR - Dominguez	7	5,236	\$48.43	\$48.47	\$0.04	0.1%
SBR - Hermosa-Redondo	6	4,488	\$40.56	\$40.60	\$0.04	0.1%
Stockton	7	5,236	\$50.60	\$50.66	\$0.06	0.1%
Visalia	11	8,228	\$26.98	\$27.26	\$0.28	1.0%
Westlake	10	7,480	\$72.20	\$72.34	\$0.14	0.2%
Willows	7	5,236	\$54.93	\$55.06	\$0.13	0.2%

Authorization

Cal Water files this request as a Tier 3 advice letter pursuant to General Order 96-B, Water Industry Rule 7.3.3(7), which addresses requests for the amortization of memorandum accounts.

Requested Effective Date

Cal Water respectfully requests that the Commission resolve this advice letter in time for Cal Water to implement authorized DRMA2 surcharges on **July 1, 2026**, on the same date other rate changes are likely to occur. However, Cal Water proposes that the actual effective date depend on the date of a final Commission resolution and the next date on which other components on customers' bills may be changing⁵.

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 **September 2, 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.***

⁵ Note that surcharges and surcredits must be known and final at least one month before their effective date to enable Cal Water to conduct the internal billing processes established to comply with Sarbanes-Oxley requirements.



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 by **October 20, 2025**. 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 comment period.



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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/

Todd Pray
Regulatory Program Manager

Enclosures

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

Attachment A

Category	Total	Total Recoverable	Total Unrecoverable	Category Includes:
Other Outside Services	\$125,291	\$31,912	\$93,379	Drought infomercial marketing, social media campaigns
Conservation Expense	\$1,017,978	\$900,015	\$117,963	Drought advertising and design, conservation expenses ("drought supplemental campaign, lawn signs, and rebate account")
Customer Records-Supplies	\$200,057	\$200,057	\$0	Drought mailers
Rents	\$34,693	\$4,028	\$30,665	Temporary pump needed for an emergency water intake.
Drought Expense Allocation	\$592,529	\$592,529	\$0	Drought expense allocation: Consulting services for drought and drought advertising
Emergency Water Use Revenue Offset	(\$1,996)	(\$1,996)	\$0	Service charges received used to offset expense recovery
Grand Total	\$1,968,551	\$1,726,544	\$242,006	

Schedule No. AS
Additional Surcharges/Surcredits

8. Drought Expense Recovery for 2023 – 2024

(N)

The following surcharges will be applied to all regulated customers, excluding Grand Oaks and Travis, for a period of twelve months starting July 1, 2026 to recover expenses incurred for drought activities from January 2023 until August 2024 tracked in the Drought Memorandum Account 2 (DRMA2).

Ratemaking Area	Surcharge (\$/CCF)	Effective Dates
Bakersfield	\$0.0085	07/01/2026 – 06/30/2027
Bay Area Region	\$0.0123	07/01/2026 – 06/30/2027
Bear Gulch	\$0.0128	07/01/2026 – 06/30/2027
Dixon	\$0.0497	07/01/2026 – 06/30/2027
East Los Angeles	\$0.0105	07/01/2026 – 06/30/2027
Kern River Valley	\$0.0772	07/01/2026 – 06/30/2027
Livermore	\$0.0244	07/01/2026 – 06/30/2027
Los Altos	\$0.0090	07/01/2026 – 06/30/2027
Los Angeles County Region (Antelope Valley, Palos Verdes)	\$0.0077	07/01/2026 – 06/30/2027
Marysville	\$0.0085	07/01/2026 – 06/30/2027
North Valley Region (Chico, Oroville)	\$0.0712	07/01/2026 – 06/30/2027
Salinas Valley Region	\$0.0080	07/01/2026 – 06/30/2027
Selma	\$0.0072	07/01/2026 – 06/30/2027
Stockton	\$0.0087	07/01/2026 – 06/30/2027
South Bay Region (Dominguez, Hermosa Redondo)	\$0.0064	07/01/2026 – 06/30/2027
Visalia	\$0.0259	07/01/2026 – 06/30/2027
Willows	\$0.0180	07/01/2026 – 06/30/2027
Westlake	\$0.0141	07/01/2026 – 06/30/2027

(N)

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<small>(To be inserted by utility)</small>	<small>Issued By</small>	<small>(To be inserted by CPUC)</small>
Advice Letter <u>2563</u>	<u>Greg Milleman</u>	Date Filed <u>May 9, 2025</u>
Decision	<u>Vice President</u>	Effective <u>June 1, 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

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

GABE NEVAREZ, PUBLIC WORKS
MANAGER
City of Lancaster
615 West Avenue H
Lancaster, CA 93534
gnevarez@cityoflancasterca.org

KIKI CARLSON, REGULATORY AFFAIRS
MANAGER
Suburban Water Systems
1325 N. Grand Avenue, Suite 100
Covina, CA 91724
kcarlson@swwc.com

CHRISTIAN HORVATH, CITY CLERK
City of Rolling Hills
2 Portuguese Bend Road
Rolling Hills CA 90274
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

BLAIR KNOX, EXECUTIVE OFFICER
Kern County LAFCO
5300 Lennox Avenue Suite 303
Bakersfield, CA 93309
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

Casa Loma Water Company
250 W. Spruce Ave., Suite 101
Clovis, CA 93611
casalomawater@gmail.com

TIMOTHY RUIZ
East Niles Community Services District
P.O. Box 6038
Bakersfield, CA 93386
truiz@eastnilescsd.org

CITY MANAGER'S OFFICE
City of Bakersfield
1600 Truxtun Avenue
Bakersfield, CA 93301
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
cpearce@duanemorris.com
jsansley@duanemorris.com
BAJones@duanemorris.com

DANIEL MALDONADO, WATER
RESOURCES DEPARTMENT
City of Bakersfield
1000 Buena Vista Rd
Bakersfield, CA 93311
drmaldonado@bakersfieldcity.us

MATTHEW COLLOM DCA, CITY
ATTORNEY'S OFFICE
City of Bakersfield
1600 Truxtun Ave, 4th Floor
Bakersfield, CA 93301
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

JOHN FRANDO, FIRE CHIEF
City of Bakersfield
2101 H St
Bakersfield, CA 93301
jfrando@bakersfieldfire.us

FIRE CHIEF
Kern County Fire Department
1115 Truxtun Ave
Bakersfield, CA 93301



Bayshore District (Bay Area Region)

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

KEVIN OKADA, ASSISTANT DIRECTOR OF
PUBLIC WORKS

City of Burlingame

501 Primrose Rd
Burlingame, CA 94010
kokada@burlingame.org

DARRYL BARROW, GENERAL MANAGER

Westborough Water District

P.O. Box 2747
South San Francisco, CA 94083
dbarrow@westboroughwater.com

ANDREW BROZYNA, PUBLIC WORKS
DIRECTOR, CITY ENGINEER

Foster City City Hall

610 Foster City Blvd
Foster City, CA 94404
abrozyna@fostercity.org
zdanish@fostercity.org
glarios@fostercity.org

DENNIS BOCH, DEPUTY DIRECTOR OF
MAINTENANCE & OPERATIONS

San Bruno Water Department

567 El Camino Real
San Bruno, CA 94066
dbosch@sanbruno.ca.gov

MATT LEE, PUBLIC SERVICES DIRECTOR

San Bruno Water Department

567 El Camino Real
San Bruno, CA 94066
mlee@sanbruno.ca.gov

JUSTIN CHAPEL, WATER UTILITIES
SUPERINTENDENT

City of Redwood City

1400 Broadway
Redwood City, CA 94063
jchapel@redwoodcity.org

LOU DURAN, PUBLIC WORKS
SUPERINTENDENT

City of San Carlos

600 Elm St
San Carlos, CA 94070
lduran@cityofsancarlos.org

SHARON RANALS, CITY MANAGER

City of South San Francisco

400 Grand Ave
South San Francisco, CA 94080
Sharon.Ranals@ssf.net

JOSHUA COSGROVE DIRECTOR

**City of Daly City Department of Water
& Wastewater Resources**

NSMCO Sanitation District
153 Lake Merced Blvd
Daly City CA 94015
jcosgrove@dalycity.org

PAUL WILLIS, PUBLIC WORKS DIRECTOR,
CITY ENGINEER

Town of Hillsborough

1600 Floribunda Ave
Hillsborough, CA 94010
pwillis@hillsborough.net

PUBLIC WORKS DIRECTOR

City of San Mateo

330 West 20th Ave
San Mateo, CA 94403
publicworks@cityofsanmateo.org

RENE RAMIREZ, INTERIM GENERAL
MANAGER

Mid Peninsula Water District

P.O. Box 129
Belmont, CA 94002
rramirez@midpeninsulawater.org



Bayshore District (Bay Area Region)

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

KAT WUELFING, ASST. GENERAL
MANAGER

Mid Peninsula Water District

P.O. Box 129

Belmont, CA 94002

kwuefing@midpeninsulawater.org

TONY BRENNER, WATER DIVISION
SUPERVISOR

Town of Hillsborough

1600 Floribunda Ave

Hillsborough, CA 94010

tbrenner@hillsborough.net

RACHEL JONES

Cox Castle & Nicholson LLP

50 California Street, Suite 3200

San Francisco, CA 94111

rjones@coxcastle.com

ONLY FOR SERVICE AREA MAPS:

ROB BARTOLI, EXECUTIVE OFFICER

San Mateo LAFCO

455 Country Center, 2nd Floor

Redwood City, CA 94063

rbartoli@smcgov.org



Bear Gulch District

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

SINDHI MEKALA, DEPUTY TOWN
ENGINEER

Town of Woodside
P.O.Box 620005
Woodside, CA 94062
smekala@woodsideca.gov

ROBERT OVADIA
Town of Atherton
91 Ashfield Rd
Atherton, CA 94027
rovadia@ci.atherton.ca.us

JOE LOCOCO, DEPUTY DIRECTOR OF
ROADS DIVISION
Los Trancos Water District
1263 Los Trancos Rd
Portola Valley, CA 94025
jlococo@smcgov.org

JASON LEDBETTER, TOWN MANAGER
Town of Woodside
P.O.Box 620005
Woodside, CA 94062
jledbetter@woodsidetown.org

PUBLIC WORKS DIRECTOR
Town of Portola Valley
765 Portola Rd
Portola Valley, CA 94028
hyoung@portolavalley.net

WATER DEPARTMENT
City of Menlo Park
701 Laurel St
Menlo Park, CA 94025
pwdirector@menlopark.gov
water@menlopark.gov

WATER DEPARTMENT
Redwood City
P.O.Box 391
Redwood City, CA 94064
revenueservices@redwoodcity.org

ONLY FOR SERVICE AREA MAPS:

ROB BARTOLI, EXECUTIVE OFFICER
San Mateo LAFCO
455 Country Center, 2nd Floor
Redwood City, CA 94063
rbartoli@smcgov.org

GAIL SREDANOVIC
2161 Ashton Ave
Menlo Park, CA 94025



Chico District (North Valley Region)

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

JENNIFER MACARTHY, DEPUTY CITY
MANAGER

City of Chico

P.O.Box 3420

Chico, CA 95927

Jennifer.macarthy@chicoca.gov

SCOTT DOWELL

City of Chico

P.O.Box 3420

Chico, CA 95927

scott.dowell@chicoca.gov

MARK SORENSON, CITY MANAGER

City of Chico

P.O. Box 3420

Chico, CA 95927

Mark.Sorensen@chicoca.gov

BARBARA MARTIN, ADMINISTRATIVE
SERVICES DIRECTOR

City of Chico

P.O. Box 3420

Chico, CA 95927

Barbara.martin@chicoca.gov

ONLY FOR SERVICE AREA MAPS:

STEPHEN LUCAS, EXECUTIVE OFFICER

Butte County LAFCO

1453 Downer St, Suite C

Oroville, CA 95965

slucas@buttecounty.net

GARRETT SJOLUND, FIRE CHIEF

Butte County Fire Rescue

176 Nelson Ave

Oroville, CA 95965



Dixon District

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

FINANCE DEPARTMENT

City of Dixon

600 East A St

Dixon, CA 95620

utility.billing@cityofdixon.us

CARY KEATEN, GENERAL MANAGER

Solano Irrigation District

508 Elmira Rd

Vacaville, CA 95687

ckeaten@sidwater.org

ONLY FOR SERVICE AREA MAPS:

RICH SEITHEL, EXECUTIVE OFFICER

Solano County LAFCO

601 Texas Street, 2nd Floor

Fairfield, CA 94533

rseithel@solanolafco.com

TODD MCNEAL, FIRE CHIEF

City of Dixon

600 East A St

Dixon, CA 95620

tmcneal@cityofdixon.us



Dominguez District (South Bay Region)

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

ANDY DARLAK
City of Torrance Public Works
20500 Madrona Ave
Torrance, CA 90630
adarlak@torranceca.gov

AUDREY JACKSON, REGULATORY
AFFAIRS
Golden State Water Company
630 East Foothill Blvd
San Dimas, CA 91733
afjackson@gswater.com

GEORGE CHEN, RATES MANAGER
**City of Los Angeles, Department of
Water & Power**
P.O. Box 51111 Room 956
Los Angeles, CA 90051
ZhengGeorge.Chen@ladwp.com

GLADYS ESTRADA, REGULATORY
AFFAIRS
Golden State Water Company
630 East Foothill Blvd.
San Dimas, CA 91773
GROSENDO@gswater.com

MICHAEL HARVEY, OPERATIONS
MANAGER
City of Compton Water Utility Division
205 S Willowbrook Ave
Compton, CA 90220
mharvey@comptonciry.org

PAUL FUJITA, WATER DEPARTMENT
City of Long Beach
1800 East Wardlow Rd
Long Beach, CA 90807
paul.fujita@lbwater.org

RONALD MOORE, REGULATORY
AFFAIRS
Golden State Water Company
630 East Foothill I Blvd
San Dimas, CA 91733
rkmoore@gswater.com

TIFFANY THONG, RATES AND
REGULATORY AFFAIRS MANAGER
PARK WATER COMPANY
P.O.Box 7002
Downey, CA 90241
Tiffany.Thong@LibertyUtilities.com

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



East Los Angeles District

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

DANIEL A DELL'OSA
San Gabriel Valley Water Company
11142 Garvey Ave
El Monte, CA 91733
dadellosa@sgvwater.com

RICHARD GONZALES
City of Monterey Park
320 W Newmark Ave
Monterey Park, CA 91754
rgonzales@montereypark.ca.gov

GEORGE NORIEGA
City of Monterey Park
320 W Newmark Ave
Monterey Park, CA 91754
gnoriega@montereypark.ca.gov

KOREY BRADBURY
Montebello Land & Water Company
344 E Madison Ave
Montebello, CA 90640
korey@mtblw.com

MARIKO MARIANES, RATES MANAGER
**City of Los Angeles Department of
Water & Power**
P.O.Box 51111 Room 956
Los Angeles, CA 90051
mariko.marianes@ladwp.com

GINA NILA, DIRECTOR OF PUBLIC WORKS
City of Commerce
2535 Commerce Way
Commerce, CA 90040

CESAR ROLDAN, DIRECTOR OF PUBLIC
WORKS
City of Montebello
1600 W Beverly Blvd
Montebello, CA 90640
croldan@montebelloca.gov

JOANNA MORENO
City of Vernon
4305 Santa Fe Ave
Vernon, CA 90058
jmoreno@cityofvernon.org

TIFFANY THONG, RATES AND
REGULATORY AFFAIRS MANAGER
PARK WATER COMPANY
P.O.Box 7002
Downey, CA 90241
Tiffany.Thong@LibertyUtilities.com

KIKI CARLSON, REGULATORY AFFAIRS
MANAGER
Suburban Water Systems
1325 N. Grand Avenue, Suite 100 Covina,
CA 91724
kcarlson@swwc.com

ONLY FOR SERVICE AREA MAPS:

ALFIE BLANCH
Los Angeles County Fire Department
5847 Rickenbacker Rd
Commerce, CA 90040
ablanch@fire.lacounty.gov

PAUL N. NOVAK, EXECUTIVE OFFICER
Los Angeles LAFCO
80 South Lake Avenue, Suite 870
Pasadena, CA 91101
pnovak@lalafco.org



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

DON MARSH
City of Tehachapi
115 S. Robinson St
Tehachapi, CA 93561
dmarsh@tehachapipw.com

TYLER NAPIER
City of Tehachapi
115 S. Robinson St
Tehachapi, CA 93561
tnapier@tehachapipw.com

SUSAN WELLS, ASSISTANT GENERAL MANAGER
Golden Hills Community Services District
P.O.Box 637
Tehachapi, CA 93581
gm@ghcsd.com

ONLY FOR SERVICE AREA MAPS:

BLAIR KNOX, EXECUTIVE OFFICER
Kern County LAFCO
5300 Lennox Ave, Suite 303
Bakersfield, CA 93309
eo@kernlafco.org

AARON DUNCAN, FIRE CHIEF
City of Tehachapi
115 S. Robinson St
Tehachapi, CA 93561



Hermosa-Redondo District (South Bay Region)

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

ANDY DARLAK
City of Torrance Public Works
20500 Madrona Ave
Torrance, CA 90630
adarlak@torranceca.gov

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

FELICE LOPEZ, FINANCE DIRECTOR
City of Hawthorne
4455 W 126th St
Hawthorne, CA 90250
flopez@cityofhawthorne.org

GEORGE CHEN, RATES MANAGER
**City of Los Angeles, Department of
Water & Power**
P.O. Box 51111 Room 956
Los Angeles, CA 90051
ZhengGeorge.Chen@ladwp.com

GLEN KAU, PUBLIC WORKS DIRECTOR
City of Hermosa Beach
1315 Valley Dr
Hermosa Beach, CA 90254
gkau@hermosabch.org

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

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

JEFF PAGE
City of Manhattan Beach
3621 Bell Ave
Manhattan Beach, CA 90266
jpage@manhattanbeach.gov

Park Billing Company
P.O.Box 910
Dixon, CA 95620

ONLY FOR SERVICE AREA MAPS:

ALFIE BLANCH
Los Angeles County Fire Department
5847 Rickenbacker Rd
Commerce, CA 90040
ablanch@fire.lacounty.gov

PAUL N. NOVAK, EXECUTIVE OFFICER
Los Angeles LAFCO
80 South Lake Avenue, Suite 870
Pasadena, CA 91101
pnovak@lalafco.org



Kern River Valley District

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

DARLENE STUDDARD, COMMITTEE
MEMBER

Residents Against Water Rates RAW
P.O.Box 3701
Wofford Heights, CA 93285

JEREMY CALLIHAN
**Department of Water Resources Safe
Drinking Water Program**
1416 Ninth St, Rm. 816
Sacramento, CA 95814
jeremy.callihan@water.ca.gov

**Department of Water Resources Safe
Drinking Water Program**
1416 Ninth St, Rm. 816
Sacramento, CA 95814

ROB BENSON
P.O.Box 1557
Kernville, CA 93238
rcbenso@earthlink.net

ONLY FOR SERVICE AREA MAPS:

BLAIR KNOX, EXECUTIVE OFFICER
Kern County LAFCO
5300 Lennox Ave, Suite 303
Bakersfield, CA 93309
eo@kernlafco.org



King City District (Salinas Valley Region)

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

STEVE ADAMS

King City

212 S. Vanderhurst Ave

King City, Ca 93930

sadams@kingcity.com

LITTLE BEAR WATER COMPANY

51201 Pine Canyon Rd, Space #125

King City, CA 93930

ONLY FOR SERVICE AREA MAPS:

RUSS NICHOLS, FIRE CHIEF

King City

212 S. Vanderhurst Ave

King City, CA 93930

kcfld@kingcity.com

KATE MCKENNA, EXECUTIVE OFFICER

LAFCO of Monterey County

P.O. Box 1369

Salinas, CA 93902

mckennak@monterey.lafco.ca.gov



Livermore District

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

ALAMEDA COUNTY FLOOD CONTROL &
WATER CONSERVATION

District Zone 7 Water Agency

100 North Canyons Parkway
Livermore, CA 94551
osolitei@zone7water.com

VALERIE PRYOR, GENERAL MANAGER

District Zone 7 Water Agency

100 North Canyons Parkway
Livermore, CA 94551
vpryor@zone7water.com

ERIK PETERSON, UTILITY BILLING
DIVISION

City of Livermore

1052 S. Livermore Ave
Livermore, CA 94550
etpeterson@ci.livermore.ca.us

STEVE LEHMAN

3625 Thornhill Dr
Livermore, CA 94551
slehman3625@gmail.com

ONLY FOR SERVICE AREA MAPS:

JOE TESTA, FIRE CHIEF

City of Livermore

1052 S. Livermore Ave
Livermore, CA 94550
mmclaughlin@lpfire.org

RACHEL JONES, EXECUTIVE OFFICER

Alameda County LAFCO

224 West Winton Ave., Suite 110
Hayward, CA 94544
rachel.jones@acgov.org



Los Altos District

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

PETER PIRNEJAD
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills, CA 94022
ppirnejad@losaltoshills.ca.gov

CATHERINE COX
City of Palo Alto, City Hall
250 Hamilton Ave
Palo Alto, CA 94301
catherine.cox@cityofpaloalto.org

CHRISTOPHER L DE GROOT
**City of Santa Clara, Water Department,
Water & Sewer Utilities**
1500 Warburton Ave
Santa Clara, CA 95050
cdegroot@santaclaraca.gov

ARIKA MILLER
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills, CA 94022
amiller@losaltoshills.ca.gov

JOHN B. TANG, P.E.
San Jose Water Company
110 W. Taylor Street
San Jose, CA 95110
john.tang@sjwater.com

PHIL WITT, GENERAL MANAGER
Purissima Hills Water District
26375 Fremont Rd
Los Altos Hills, CA 94022
philw@purissimawater.org

SHILPA MEHTA
**City of Santa Clara, Water Department,
Water & Sewer Utilities**
1500 Warburton Ave
Santa Clara, CA 95050
smehta@santaclaraca.gov

MATT MORLEY
City of Cupertino
10300 Torre Ave
Cupertino, CA 95014
Mattm@cupertino.org

MANSOUR NASSER
City of Sunnyvale, Water Dept.
P.O.Box 3707
Sunnyvale, CA 94088
mnasser@sunnyvale.ca.gov

Santa Clara Valley, Water District
5750 Almaden Expressway
San Jose, CA 95118
dtaylor@valleywater.org

Great Oaks Water Company
15 Great Oaks Blvd #100
San Jose, CA 95119
tguster@greatoakswater.com

**City of Santa Clara, Water Department,
Water & Sewer Utilities**
1500 Warburton Ave
Santa Clara, CA 95050
water@santaclaraca.gov

City of Mountain View, Water Dept.
231 N Whisman Rd
Mt. View, CA 94043
public.services@mountainview.gov

ANN SELLERS
**City of Mountain View, Purchasing
Dept.**
231 N Whisman Rd
Mt. View, CA 94043
Ann.Sellers@mountainview.gov



Los Altos District

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

ONLY FOR SERVICE AREA MAPS:

NEELIMA PALACHERLA, EXECUTIVE
DIRECTOR

SANTA CLARA COUNTY LAFCO

777 North First Street, Suite 410

San Jose, CA 95112

neelima.palacherla@ceo.sccgov.org



Marysville District

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

DIANA LANGLEY, PUBLIC WORKS
DIRECTOR/CITY ENGINEER
City of Yuba City
302 Burns Dr
Yuba City, CA 95991
dlanglely@yubacity.net

BRIAN DAVIS
GENERAL MANAGER
Linda County Water District
1280 Scales
Marysville, CA 95901
bdavis@lindawater.com

GENERAL MANAGER
Olivehurst Public Utility District
P.O.Box 670
Olivehurst, CA 95961
opudmgr@opud.org

JENNIFER STYCZYNSKI, SENIOR
ACCOUNTANT
City of Marysville
P.O.Box 150
Marysville, CA 95901
jennifers@marysville.ca.us

ONLY FOR SERVICE AREA MAPS:

PAIGE HENSLEY, DEPUTY EXECUTIVE
OFFICER
Yuba County LAFCO
915 8th St, Suite 107
Marysville, CA 95901
phensley@co.yuba.ca.us

MARK KENDAL, DENNIS NOLAN;
CHEIF OF OPERATIONS
P.O. Box 944246
Sacramento, CA 94244
mark.kendal@fire.ca.gov
dennis.nolan@fire.ca.gov



Oroville District (North Valley Region)

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

RUTH WRIGHT

City of Oroville

1735 Montgomery St
Oroville, CA 95965

wright@cityoforoville.org

JAYME BOUCHER

Thermalito Irrigation District

410 Grand Ave
Oroville, CA 95965

jboucher@twsd.info

RATH MOSELEY, GENERAL MANAGER

South Feather Water & Power

2310 Oroville Quincy Hwy
Oroville, CA 95966

rmoseley@southfeather.com

ONLY FOR SERVICE AREA MAPS:

STEPHEN LUCAS, EXECUTIVE OFFICER

Butte County LAFCO

1453 Downer St, Suite C
Oroville, CA 95965

slucas@buttecounty.net

FIRE CHIEF

City of Oroville

1735 Montgomery St
Oroville, CA 95965



Palos Verdes District (Los Angeles County Region)

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

ANDY DARLAK
City of Torrance Public Works
20500 Madrona Ave
Torrance, CA 90630
adarlak@torranceca.gov

GEORGE CHEN, RATES MANAGER
City of Los Angeles, Department of Water & Power
P.O. Box 51111 Room 956
Los Angeles, CA 90051
ZhengGeorge.Chen@ladwp.com

JANE LIN
City of Rancho Palos Verdes
30940 Hawthorne Blvd
Rancho Palos Verdes, CA 90275
janel@rpvca.gov

LINA HERNANDEZ **City of Lomita, Interim Public Works**
P.O.Box 339
Lomita, CA 90717
lina.hernandez@lomitacity.com

MIKE WHITEHEAD
City of Rolling Hills Estates
4045 Palos Verdes Drive North
Rolling Hills Estates, CA 90274

TRANG NGUYEN, DEPUTY DIRECTOR OF FINANCE
City of Rancho Palos Verdes
30940 Hawthorne Blvd
Rancho Palos Verdes, CA 90275
tnguyen@rpvca.gov

KYLYNN CHANEY, CITY CLERK
City of Palos Verdes Estates
340 Palos Verdes Dr West
Palos Verdes Estates, CA 90274
cityclerk@pvestates.org

MARK PRESTWICH, CITY MANAGER
City of Palos Verdes Estates
340 Palos Verdes Dr West
Palos Verdes Estates, CA 90274
citymanager@pvestates.org

VINA RAMOS, ACCOUNTING SUPERVISOR
City of Rancho Palos Verdes
30940 Hawthorne Blvd
Rancho Palos Verdes, CA 90275
vramos@rpvca.gov

GREG GRAMMAR
City of Rolling Hills Estates
gregg@ci.rolling-hills-estates.ca.us

DAVID WAHBA
City of Rancho Palos Verdes
davidw@ci.rolling-hills-estates.ca.us

CHRISTIAN HORVATH, CITY CLERK
City of Rolling Hills
2 Portuguese Bend Road
Rolling Hills CA 90274
chorvath@cityofrh.net

ARA MIHRANIAN
City of Rancho Palos Verdes
AraM@rpvca.gov

City of Rancho Palos Verdes
30940 Hawthorne Blvd
Rancho Palos Verdes, CA 90275
finance@rpvca.gov



Palos Verdes District (Los Angeles County Region)

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

KIKI CARLSON, REGULATORY AFFAIRS
MANAGER

Suburban Water Systems

1325 N. Grand Avenue, Suite 100

Covina, CA 91724

kcarlson@swwc.com

ONLY FOR SERVICE AREA MAPS:

ALFIE BLANCH

Los Angeles County Fire Department

5847 Rickenbacker Rd

Commerce, CA 90040

ablanch@fire.lacounty.gov

PAUL N. NOVAK, EXECUTIVE OFFICER

Los Angeles LAFCO

80 South Lake Avenue, Suite 870

Pasadena, CA 91101

pnovak@lalafco.org



Redwood Valley District (Bay Area Region)

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

DIRECTOR OF PUBLIC WORKS

County of Marin

P.O.Box 4186
San Rafael, CA 94913
rgaglione@marincounty.org

SCOTT HARTER

County of Lake Special Districts

230 North Main
Lakeport, CA 95453
scott.harter@lakecountyca.gov

SHARON DEMARTINI, ASSISTANT TO
DIRECTOR OF PUBLIC WORKS

County of Marin

P.O. Box 4186
San Rafael, CA 94913
sdemartini@marincounty.org

CRAIG BACH

bachelectric.bach1@gmail.com

JOHN SUYDAM

jnsuydam@gmail.com

RACHEL JONES

Cox Castle & Nicholson LLP

50 California Street, Suite 3200
San Francisco, CA 94111
rjones@coxcastle.com

North Marin Water District

P.O. Box 146
Novato, CA 94948
info@nmwd.com

LISA CARTER

lisa.carter.333@gmail.com

SCOTT MILLER

P.O. Box 145
Dillon beach, CA 94929
handmadeinmarin@gmail.com

ONLY FOR SERVICE AREA MAPS:

JASON FRIED, EXECUTIVE OFFICER

Marin LAFCO

1401 LOS GAMOS DRIVE, SUITE 220
San Rafael, CA 94903
jfried@marinlafco.org



Salinas District (Salinas Valley Region)

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

BRIAN FRUS, INTERIM GENERAL
MANAGER

City of Salinas
200 Lincoln Ave
Salinas, CA 93901

CHRISTOPHER A. CALLIHAN, CITY
ATTORNEY

City of Salinas
200 Lincoln Ave
Salinas, CA 93901
chrisc@ci.salinas.ca.us

TOM ADCOCK
Alco Water Service

249 Williams Rd
Salinas, CA 93905
andrea@alcowater.com

Gabilan Water Company

644 San Juan Grade Road
Salinas, CA 93906

CLAUDIA ESCALANTE, EXECUTIVE
ASSISTANT

Monterey County Administration
168 West Alisal Street, 3rd Floor
Salinas, CA 93901
escalantec@co.monterey.ca.us

SONIA M. DE LA ROSA, COUNTY
ADMINISTRATIVE OFFICER

Monterey County Administration
168 West Alisal Street, 3rd Floor
Salinas, CA 93901
delarosasm@co.monterey.ca.us

ONLY FOR SERVICE AREA MAPS:

KATE MCKENNA, EXECUTIVE OFFICER
Monterey County LAFCO

P.O. Box 1369
Salinas, CA 93902
mkennak@monterey.lafco.ca.gov

SAMUEL KELMEK, FIRE CHIEF

City of Salinas
200 Lincoln Ave
Salinas, CA 93901

RUSS NICHOLS, FIRE CHIEF

King City
212 S. Vanderhurst Ave
King City, CA 93930
kcfid@kingcity.com



Selma District

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

BROCK BUCHE, DIRECTOR
**City of Fresno, Department of Public
Utilities**
1626 E Street
Fresno, CA 93706
Brock.Buche@fresno.gov

DARIO DOMINGUEZ , PUBLIC WORKS
DIRECTOR
City of Fowler
128 S 5th St
Fowler, CA 93625
ddominguez@ci.fowler.ca.us

FERNANDO SANTILLAN, CITY MANAGER
City of Selma, City Manager
1710 TUCKER ST
SELMA, CA 93662
fernandos@cityofselma.com

MAY ALBIANI, EXECUTIVE ASSISTANT
**City of Fresno, Department of Public
Utilities**
1626 E Street
Fresno, CA 93706
may.albiani@fresno.gov

JUAN RIOS, BUSINESS MANAGER
**City of Fresno, Department of Public
Utilities**
1910 E. University Avenue
Fresno, CA 93703
Juan.Rios@fresno.gov

ONLY FOR SERVICE AREA MAPS:

BRIAN SPAUNHURST, EXECUTIVE
OFFICER
Fresno County LAFCO
1401 FULTON STREET, SUITE 800
Fresno, CA 93721
bspaunhurst@fresnocountyca.gov

JORDAN WEBSTER, FIRE CHIEF
City of Selma, City Hall
1710 Tucker St
Selma, CA 93662
jordanw@cityofselma.com



Stockton District

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

RACHEL DEBORD, CHIEF DEPUTY CLERK
San Joaquin County
44 N San Joaquin St, 6th Floor, Suite
627
Stockton, CA 95202
rdebord@sjgov.org

DEPUTY DIRECTOR OF PUBLIC WORKS
County of San Joaquin
1810 East Hazelton Ave
Stockton, CA 95205
fbuchman@sjgov.org

JOHN ABREW, MUNICIPAL UTILITIES
DEPARTMENT DIRECTOR
City of Stockton
425 N El Dorado St
Stockton, CA 95202
mud@stocktonca.gov

HARRY BLACK, CITY MANAGER
City of Stockton
425 N El Dorado St
Stockton, CA 95202
city.manager@stocktonca.gov

CHRISTINA FUGAZI, MAYOR
City of Stockton
425 N El Dorado St
Stockton, CA 95202
mayorfugazi@stocktonca.gov

MUNICIPAL UTILITY DEPARTMENT
City of Stockton
2500 Navy Dr
Stockton, CA 95206
mud@stocktonca.gov

SCOT A. MOODY, GENERAL MANAGER
Stockton-East Water District
6767 East Main Street
Stockton, CA 95215
sewd@sewd.net

Park Billing Company
P.O.Box 910
Dixon, CA 95620

ONLY FOR SERVICE AREA MAPS:

J. D. HIGHTOWER, EXECUTIVE OFFICER
San Joaquin LAFCO
44 N. San Joaquin Street, Suite #374
Stockton, CA 95202
jhightower@sjgov.org

RICHARD J. EDWARDS, FIRE CHIEF
City of Stockton
400 E. Main Street, 4th floor
Stockton, CA 95202



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

GLEN LUBLIN
Bedel Mutual Water Company
2536 E College Ave
Visalia, CA 93292

LESLIE CAVIGLIA, CITY MANAGER
City of Visalia
220 N. Santa Fe St
Visalia, CA 93291
leslie.caviglia@Visalia.City

OSA WOLFF
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102
wolff@smwlaw.com

ONLY FOR SERVICE AREA MAPS:

BEN GIULIANI, EXECUTIVE OFFICER
Tulare County , LAFCO
210 N. Church Street, Suite B
Visalia, CA 93291
bgiuliani@tularecounty.ca.gov

DANIEL GRISWOLD, FIRE CHIEF
City of Visalia
707 West Acequia St
Visalia, CA 93291
fd.online@visalia.city



Westlake District

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

JOHN ZHAO, P.E.
Las Virgenes Municipal Water District
4232 Las Virgenes Road
Calabasas, CA 91302
jzhao@lvmwd.com

URSULA BOSSON
Las Virgenes Municipal Water District
4232 Las Virgenes Road
Calabasas, CA 91302
ubosson@lvmwd.com

GEORGE CHEN, RATES MANAGER
**City of Los Angeles, Department of
Water & Power**
P.O. Box 51111 Room 956
Los Angeles, CA 90051
ZhengGeorge.Chen@ladwp.com

CLIFF FINLEY, PUBLIC WORKS DIRECTOR
City of Thousand Oaks
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362
CFinley@toaks.org

JOCELYN ADLAO
Triunfo Water & Sanitation District
370 N. Westlake Blvd. Suite 100
Westlake Village, CA 91362
JocelynAdlao@Triunfowsd.com

**CALIFORNIA-AMERICAN WATER
COMPANY**
520 Capitol Mall Ste. 630
Sacramento, CA 95814
ca.rates@amwater.com

ONLY FOR SERVICE AREA MAPS:

KAI LUOMA, EXECUTIVE OFFICER
Ventura LAFCO
800 S Victoria Ave, Suite 301
Ventura, CA 93003
kai.luoma@ventura.org

DAVID ENDAYA, FIRE CHIEF
City of Ventura Fire Department
1425 Dowell Drive
Ventura, CA 93003
firechief@cityofventura.ca.gov



Willows District

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

MARTI BROWN, INTERIM CITY
MANAGER

City of Willows Civic Center

201 N Lassen St

Willows, CA 95988

mbrown@cityofwillows.org

ONLY FOR SERVICE AREA MAPS:

STEPHEN BETTS, INTERIM EXECUTIVE
OFFICER

County of Glenn Local Agency

Formation Commission

525 W. Sycamore St., Ste B1

Willows, CA 95988

srbetts@att.net

NATHAN MONCK, FIRE CHIEF

City of Willows Fire Department

445 South Butte St

Willows, CA 95988

nmonck@cityofwillows.org