

**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 Kern River Valley and Travis (excludes District: Grand Oaks) CPUC Utility #: U-60-W Advice Letter #: 2565 Tier: ☒ 1 ☐ 2 ☐ 3 ☐ Compliance Authorization: D.24-03-042 Description: 2024 M-WRAM balance amortization	Date Mailed to Service List: 09/03/2025 Protest Deadline (20th Day): 09/23/2025 Review Deadline (30th Day): 10/03/2025 Requested Effective Date: 10/01/2025 Rate Impact: Various
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The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list. Please see the "Response or Protest" section in the advice letter for more information.

Utility Contact: Karlee Kaylor
Phone: 530-922-0855
Email: kkaylor@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
_____	_____	_____
_____	_____	_____
_____	_____	_____

[] APPROVED	[] WITHDRAWN	[] REJECTED
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Signature: _____	Comments: _____
Date: _____	_____



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

September 3, 2025

Advice Letter No. 2565

To the California Public Utilities Commission:

California Water Service Company (Cal Water) respectfully submits this Tier 1 advice letter requesting authority to make the changes in its tariff as described below.

New/Revised CPUC Sheet No.	Title of Sheet	Schedule No.	Cancelling CPUC Sheet No.
	Additional Surcharges/Surcredits		
XXXXX-W	Page 5	XXXXX-W	13602-W
XXXXX-W	Table of Contents Page 6	TOC 6	XXXXX-W
XXXXX-W	Table of Contents Page 1	TOC 1	XXXXX-W

Summary

This advice letter is submitted pursuant to Preliminary Statement BG for the Monterey-Style Water Revenue Adjustment Mechanism Balancing Account ("M-WRAM"), authorized by Decision ("D.") 24-03-042, resolving Cal Water's 2021 General Rate Case ("2021 GRC"). The M-WRAM only applies to residential customers billed on a tiered rate structure and does not apply to flat rate service customers or non-residential service customers. Accordingly, Cal Water requests M-WRAM amortization for the following areas: Bay Area Region, Bakersfield, Bear Gulch, Dixon, East Los Angeles, Livermore, Los Altos, Los Angeles County Region, Marysville, North Valley Region, Salinas Valley Region, Selma, South Bay Region, Stockton, Visalia, Westlake, and Willows.¹

Cal Water is requesting an effective date of **October 1, 2025** for the M-WRAM surcharges proposed in this Tier 1 filing.

Background

On February 29, 2008, the Commission issued D.08-02-036, Opinion Resolving Phase 1A Settlement Agreements and Contested Issues in its investigation into conservation policy objectives for Class A water utilities. Among other things, D.08-02-036 approved a settlement agreement authorizing Cal Water to establish full decoupling through a Water Revenue Adjustment Mechanism ("WRAM") and Modified Cost Balancing Account ("MCBA").²

¹ These are all of Cal Water's Class A ratemaking areas that have tiered quantity rates, and therefore exclude both the Kern River Valley District and the Travis District.

² D.08-02-036, Ordering Paragraph No. 1.



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On September 3, 2020, the Commission issued D.20-08-047, prohibiting Cal Water (among other Class A water utilities) from proposing to continue its WRAM and MCBA in its next GRC, but allowing the utility to propose the use of the Monterey-style WRAM ("M-WRAM") and Incremental Cost Balancing Accounts ("ICBA").³

On March 15, 2024, the Commission issued D.24-03-042, which in part granted Cal Water's request to utilize an M-WRAM in accordance with D.20-08-047.⁴

Advice letter 2532 authorized surcharges for the 2023 balances for all Class A ratemaking areas except Kern River Valley and Travis. The 2023 M-WRAM surcharge will continue for ratemaking areas that had a longer than 12-month amortization recovery period.

Discussion

In this advice letter, Cal Water proposes to amortize the amounts recorded in the M-WRAM for calendar year 2024, consistent with the provisions of Preliminary Statement BG, as shown in the table below. Cal Water is authorized to accrue interest on this balance based on the 90-day commercial paper rate, and to continue to earn interest on the uncollected balance. The amount used to determine the surcharge calculation includes: 1) the net balance at the end of calendar year 2024, 2) interest on the 2024 net balance through July 2025, and 3) compounded interest accrued over the duration of the 2023 M-WRAM amortization recorded from October 2024 through July 2025.

The M-WRAM tracks the difference between quantity revenues collected under each residential rate tier and the quantity revenues that would have been collected under a single quantity rate at the equivalent level of sales. The single quantity rates used to calculate the M-WRAM were approved in previously filed advice letters that were effective in 2024.

Ratemaking Area	M-WRAM Balance	Surcharge Duration (mos.)	Surcharge (\$/ccf)
Bakersfield	\$1,050,103	12	\$0.0754
Bay Area Region (Bayshore, Redwood Valley)	\$3,759,453	24	\$0.4521
Bear Gulch	\$414,059	12	\$0.1036
Dixon	\$184,536	12	\$0.5374
East Los Angeles	\$632,549	12	\$0.2451
Livermore	\$677,514	12	\$0.2733
Los Altos	\$1,899,506	12	\$0.5898
Los Angeles County Region - Antelope Valley	\$71,154	18	\$0.2991
Los Angeles County Region - Palos Verdes	\$ 2,420,039	18	\$0.3083
Marysville	\$81,912	12	\$0.2014

³ D.20-08-047, Ordering Paragraph No. 3.

⁴ D.24-03-042 at pp. 108-112.



CALIFORNIA WATER SERVICE COMPANY

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Ratemaking Area	M-WRAM Balance	Surcharge Duration (mos.)	Surcharge (\$/ccf)
North Valley Region (Chico, Oroville)	\$1,169,946	12	\$0.2282
Salinas Valley Region (Salinas, King City)	\$434,251	12	\$0.1419
Selma	\$82,129	12	\$0.0802
South Bay Region (Dominguez, Hermosa Redondo)	\$2,476,072	12	\$0.4509
Stockton	\$1,713,826	12	\$0.3706
Visalia	\$614,003	12	\$0.0764
Westlake	\$845,276	12	\$0.4850
Willows	\$124,749	12	\$0.4379

Calculation of M-WRAM Surcharges: Recovery of under-collected revenues tracked in the M-WRAM occurs via a quantity surcharge. To calculate the surcharge, the M-WRAM amortization balance for each ratemaking area is divided by the 2025 adopted residential sales forecast for that area, resulting in a dollars-per-centum cubic feet (\$/CCF) surcharge.

Amortization Periods: Guidance on recovery periods is provided in Standard Practice U-27-W.⁵ Under that guidance, the amortization period for all areas would be 12 months because their M-WRAM balances are less than 5% of the last authorized revenue requirement.

To reduce residential customer bill impacts, Cal Water is voluntarily proposing an extended 18-month recovery period in the Los Angeles County Region and 24-month recovery period in the Bay Area Region.

Requested Effective Date

Pursuant to General Order 96-B, Water Industry Rule 7.3.1, this advice is submitted with a Tier 1 designation. This advice letter can be considered “effective pending disposition” by the Commission staff’s determination that the filing complies with the standard practice and that the surcharge calculations are correct. Cal Water requests that the attached tariffs be considered effective on **October 1, 2025**.

Notice

Customer Notice – Pursuant to General Order 96-B, General Rule 7.3.1, no customer notice of Tier 1 advice letters is required.

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 **September 3, 2025** to competing and adjacent utilities and other utilities or interested parties having requested such notification. ***Please note that this advice letter is only being distributed electronically.***

⁵ Standard Practice U-27-W, Paragraph 64.b.



Response or Protest

Anyone may respond to or protest this advice letter. 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 that 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 advice letter process does not provide for any responses, protests or comments, except for the utility's reply, after the 20-day comment period. 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 us, addressed to:

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

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division, within the 20-day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.



CALIFORNIA WATER SERVICE COMPANY

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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.

CALIFORNIA WATER SERVICE COMPANY

_____/s/____

Karlee Kaylor
Rates Analyst

cc: Syreeta Gibbs (Public Advocates Office)

PublicAdvocatesWater@cpuc.ca.gov

CALIFORNIA WATER SERVICE COMPANY

1720 North First Street

San Jose, CA 95112

(408) 367-8200

Revised
CancellingCal. P.U.C. Sheet No. XXXXX-W
Cal. P.U.C. Sheet No. 13602-W**Schedule No. AS**
Additional Surcharges/Surcredits

Page 5

4. M-WRAM Surcharges and Surcredits

The purpose of the Monterey-Style Water Revenue Adjustment Mechanism (M-WRAM) is to track the difference between actual quantity revenues collected from residential customers who have a tiered rate structure, and the quantity revenues that would have been collected if a single quantity rate (i.e., a uniform rate) had been in effect in that area. This comparison is done by multiplying the actual amount of water used by the uniform rate authorized by the Commission.

Because there was an under-collection of revenues tracked in the M-WRAM Balancing Account in calendar years 2023 and 2024, a surcharge is applied to each 100 cubic feet (CCF) of water used by residential metered customers in those areas that had tiered quantity rates as shown below.

Ratemaking Area	2023 Balance			2024 Balance		
	Surcharge (\$/ccf)	Effective Dates		Surcharge (\$/ccf)	Effective Dates	
Bakersfield	\$0.0484	10/01/2024 – 09/30/2026		\$0.0754	10/01/2025 – 09/30/2026	(N)
Bay Area Region	\$0.3346	10/01/2024 – 09/30/2026		\$0.4521	10/01/2025 – 09/30/2027	(N)
Bear Gulch			(D)	\$0.1036	10/01/2025 – 09/30/2026	(N)
Dixon	\$0.2734	10/01/2024 – 09/30/2026		\$0.5374	10/01/2025 – 09/30/2026	(N)
East Los Angeles			(D)	\$0.2451	10/01/2025 – 09/30/2026	(N)
Livermore			(D)	\$0.2733	10/01/2025 – 09/30/2026	(N)
Los Altos			(D)	\$0.5898	10/01/2025 – 09/30/2026	(N)
Los Angeles County Region - Antelope Valley	\$0.4675	10/01/2024 – 09/30/2026		\$0.2991	10/01/2025 – 03/31/2027	(N)
Los Angeles County Region - Palos Verdes	\$0.1981	10/01/2024 – 09/30/2026		\$0.3083	10/01/2025 – 03/31/2027	(N)
Marysville			(D)	\$0.2014	10/01/2025 – 09/30/2026	(N)
North Valley Region (Chico, Oroville)	\$0.1195	10/01/2024 – 09/30/2026		\$0.2282	10/01/2025 – 09/30/2026	(N)
Salinas Valley Region	\$0.0645	10/01/2024 – 09/30/2026		\$0.1419	10/01/2025 – 09/30/2026	(N)
Selma			(D)	\$0.0802	10/01/2025 – 09/30/2026	(N)
South Bay Region (Dominguez, Hermosa Redondo)	\$0.2025	10/01/2024 – 09/30/2026		\$0.4509	10/01/2025 – 09/30/2026	(N)
Stockton			(D)	\$0.3706	10/01/2025 – 09/30/2026	(N)
Visalia			(D)	\$0.0764	10/01/2025 – 09/30/2026	(N)
Westlake	\$0.2476	10/01/2024 – 09/30/2026		\$0.4850	10/01/2025 – 09/30/2026	(N)
Willows	\$0.2262	10/01/2024 – 09/30/2026		\$0.4379	10/01/2025 – 09/30/2026	(N)

(Continued)

(To be inserted by utility)

Advice Letter 2565

Decision

Issued By

Greg MillemanVice PresidentRates and Regulatory Affairs

(To be inserted by CPUC)

Date Filed _____

Effective _____

Resolution _____

(T)
|
(T)

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. 13784-W

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Fire Flow Testing Charge	FF	8597-W	
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Private Fire Protection Service			
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(Continued)

(To be inserted by utility)	Issued By	(To be inserted by CPUC)
Advice Letter <u>2565</u>	<u>Greg Milleman</u>	Date Filed _____
Decision	<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

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

Cal. P.U.C. Sheet No. 13817-W

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The following listed tariff sheets contain all effective rates and rules affecting the rates and service of the Utility together with information relating thereto:

<u>Sheet</u>	<u>Subject Matter</u>	<u>Service Area</u>	<u>Schedule No.</u>	<u>CPUC Sheet No.</u>
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(To be inserted by utility)	Issued By	(To be inserted by CPUC)
Advice Letter <u>2565</u>	<u>Greg Milleman</u>	Date Filed _____
Decision	<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

GABE NEVAREZ, PUBLIC WORKS
MANAGER
City of Lancaster
615 West Avenue H
Lancaster, CA 93534
gnevarez@cityoflanasterca.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 Truxton 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
clpearce@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 Truxton Ave
Bakersfield, CA 93301



Bayshore District (Bay Area Region)

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

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

kwuelfing@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@solanolaftco.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@comptoncity.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@montebellocal.ca.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



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



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

kcfcd@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
dlangley@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

wrightr@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@lakecountycalifornia.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
kcfd@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@Triunfowd.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