





September 2, 2025

**Advice Letter No. 2564**

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 4	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 advice letter requests to amortize the balances of \$3,934,885 tracked in the Drought Response Memorandum Account ("DREMA") associated with revenue changes during mandatory rationing or voluntary conservation measures (often referred to as “lost revenues”) pursuant to Rule 14.1 and Schedule 14.1 for the period of January 2023 to August 2024. Based on under- or over- collected net balances, Cal Water requests approval to apply a quantity-based surcharge per CCF, or a sur-credit per service, to customers’ bills. The surcharges and sur-credits vary by ratemaking area.

In accordance with Water Industry Rule 7.3.3(7) of G.O. 96-B, this filing is designated as Tier 3 and requires a Commission resolution for approval. 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.<sup>1</sup>

**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.<sup>2</sup>

<sup>1</sup> 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.

<sup>2</sup> <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>.



- On June 8, 2021, the State Water Resources Control Board issued a Notice to Public Drinking Water Systems regarding ongoing dry conditions in California and drought preparation. On the same day, the President of the California Public Utilities Commission issued a letter to all investor-owned water utilities calling upon the utilities to remind their customers of the ongoing dry conditions and to encourage actions to reduce water usage. The letter referenced Standard Practice U-40-W, which was adopted pursuant to Resolution W-4976, issued February 28, 2014. Recognizing the financial impact of increased conservation measures during a declared drought emergency on those water utilities without a full decoupling water revenue adjustment mechanism ("WRAM"), the Commission authorized such utilities to add a memorandum account to track lost revenues associated with reduced sales from voluntary conservation or mandatory rationing, stating as follows:

A lost revenue memorandum account to track revenue shortfalls associated with reduced sales from either activation of voluntary conservation measures or a mandatory rationing plan [sic] pursuant to a declared drought emergency is available only to utilities that do not have an existing full revenue decoupling WRAM. Utilities requesting a lost revenue memorandum account should activate either voluntary conservation measures pursuant to Rule 14.1 or mandatory rationing pursuant to Schedule 14.1 before booking revenue shortfalls to the memorandum account. Lost revenues should be tracked only so long as conservation measures are in effect. Affected utilities should file a Tier 2 advice letter to add the memorandum account to the Preliminary Statements in its tariff. (Res. W-4976, p. 11)

- In June 2021, Cal Water updated its Water Shortage Contingency Plan in conjunction with the update to its Urban Water Management Plan. On June 14, 2021, Cal Water filed Advice Letter 2412 requesting updates to Rule 14.1 and Schedule 14.1 relating to voluntary and mandatory conservation.
- Cal Water has since filed Advice Letters 2426, 2446, 2448, and 2452 requesting authority to activate Stage 2 in all of its regulated service areas.
- On September 4, 2024, the Governor issued termination proclamation and ended drought in the some of the California counties.

### **Discussion**

Recently, in Decision ("D.") 20-08-047 (adopted in Phase 1 of the recently closed Rulemaking 17-06-024), the Commission expressed its *expectation* that water utilities would avail themselves of a

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<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>



Lost Revenue Memorandum account to track losses of revenues as a result of mandatory or voluntary drought measures, stating that:

During the Governor declared drought emergencies, the Commission has adopted appropriate measures which allowed utilities without a WRAM/MCBA to track lost revenues due to reductions in water use due to both voluntary and mandatory customer reductions. As described in Resolution W-4976 adopted February 27, 2014, these measures provide that a utility without a WRAM/MCBA was authorized to establish a Lost Revenue Memorandum Account to track revenue shortfalls. ... If, in the future, there are Governor declared droughts, we expect that water utilities that no longer have WRAM/MCBA for tracking lost drought revenues will be provided an opportunity to establish similar lost revenue memorandum accounts during the time of declared drought. (D.20-08-047, pp. 74-75 (emphasis added).)

Moreover, the Commission found as a matter of fact in D.20-08-047 that:

21. During a governor declared drought emergency, it is reasonable to provide utilities not using a WRAM/MCBA mechanism an option to establish lost revenue memorandum accounts. (D.20-08-047, Finding of Fact No. 21.)

Therefore, on December 9, 2022, Cal Water filed Advice Letter 2468 to open a "Drought Response Memorandum Account" ("DREMA") to address the Governor's Proclamations of State of Emergency regarding drought conditions in numerous California counties ("drought declaration"). The effective date of the DREMA was January 1, 2023.

Furthermore, in D. 24-03-042 (Cal Water's 2021 GRC), the Commission disallowed continuation of the WRAM/MCBA to comply with D.20-08-047.<sup>3</sup> (Previous impacts of the drought would have been addressed in the WRAM/MCBA.) Therefore, beginning January 1, 2023, Cal Water started tracking revenue changes associated with the drought.

In this advice letter, Cal Water is requesting to amortize calculated balances from January 2023 to August 2024 (for the period before the termination proclamation was issued on September 4, 2024) tracked in the Drought Response Memorandum Account ("DREMA") for the ratemaking areas listed below. Company-wide, this is a net amount of \$3,934,885.

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<sup>3</sup> 2021 GRC D. 24-03-042 p.108-112 (pdf p. 114-118) and CPUC D.20-08-047, ordering paragraph # 3, p. 106 (pdf p.108)



Dept ID	Rate Area	Amortization Balance
170	Bay Area Region	\$73,857
101	Bakersfield	\$1,113,532
102	Bear Gulch	\$248,920
105	Dixon	\$91,831
106	East Los Angeles	\$61,991
134	Kern River Valley	(\$573,457)
110	Livermore	(\$49,160)
111	Los Altos	\$0
172	Los Angeles County Region - Antelope Valley	(\$199,180)
122	Los Angeles County Region - Palos Verdes	\$623,428
112	Marysville	\$52,342
996	North Valley Region	\$0
171	Salinas Valley Region	\$340,563
117	Selma	\$0
119	Stockton	\$0
997	South Bay Region	\$982,693
120	Visalia	\$408,706
121	Willows	\$64,342
123	Westlake	\$694,477

Cal Water has furnished the Commission's Water Division staff with workpapers supporting the proposed surcharges. These work papers show the computation of the balances in the DREMA requested for amortization, including a 20-basis point adjustment (reduction) to the authorized return on equity as required prior to amortization. Furthermore, the DREMA balances for all districts are also adjusted with Earning Test analysis for the calendar year 2023-2024 performed for all districts for the same period of DREMA amortization. Finally, changes in water production costs (purchased power, purchased water, pump taxes, and purchased chemicals) resulting from are reflected in the DREMA balances.

The Table below shows typical monthly bill impact for a residential customers based on surcharge or sur-credit calculated for under- or over- revenue collections, respectively, applied to average usage.



Tariff Area	Median Usage	Gallons	Bill as of 8.31.25	Bill as of 7.1.26		
				w-DREMA Surcharge/Sur-credits	\$ Difference	% Difference
Bakersfield	12	8,976	\$50.59	\$51.21	\$0.62	1.2%
Bay Area Region	6	4,488	\$53.05	\$53.10	\$0.05	0.1%
BAR - Coast Springs	1	748	\$34.57	\$34.58	\$0.01	0.0%
Bear Gulch	8	5,984	\$80.23	\$80.65	\$0.42	0.5%
Dixon	7	5,236	\$74.27	\$75.77	\$1.50	2.0%
East LA	8	5,984	\$60.59	\$60.68	\$0.09	0.1%
Kern River Valley	3	2,244	\$74.39	\$68.59	(\$5.80)	-7.8%
LAR - Antelope Valley	7	5,236	\$48.30	\$42.44	(\$5.86)	-12.1%
LAR - Palos Verdes	11	8,228	\$98.26	\$99.29	\$1.03	1.0%
Livermore	8	5,984	\$57.74	\$55.14	(\$2.60)	-4.5%
Marysville	7	5,236	\$49.55	\$49.99	\$0.44	0.9%
Salinas Valley Region	7	5,236	\$47.19	\$47.53	\$0.34	0.7%
SBR - Dominguez	7	5,236	\$48.43	\$48.82	\$0.39	0.8%
SBR - Hermosa-Redondo	6	4,488	\$40.56	\$40.90	\$0.34	0.8%
Visalia	11	8,228	\$26.98	\$27.34	\$0.36	1.3%
Westlake	10	7,480	\$72.20	\$74.81	\$2.61	3.6%
Willows	7	5,236	\$54.93	\$55.95	\$1.02	1.9%

**Future DREMA Amortization**

While Cal Water may continue to experience lost revenues in areas where the end of the drought has not formally been declared, Cal Water proposes that the DREMA be considered *closed to further activity after August 2024, with the sole exception of interest*. In this advice letter, Cal Water is not including interest consistent with Resolution w-5282<sup>4</sup>, which did not allow San Gabriel to recover interest tracked in its lost revenue memorandum account. On July 30, 2025, the California Water Association filed a Petition to Modify D. 94-06-033 (CWA Petition) requesting that interest be allowed in lost revenue memo accounts consistent with the Commission’s treatment of all other balancing and memo accounts. Cal Water proposes to leave the DREMA open, under the terms indicated above, pending resolution of the CWA Petition.

**Requested Effective Date**

Cal Water respectfully requests that the Commission resolve this advice letter in time for Cal Water to implement authorized DREMA surcharges/Sur-credits on **July 1, 2026**, on the same date other rate changes are likely to occur.

<sup>4</sup> CPUC Resolution W-5282 p. 6-7.



## **Notice**

**Customer Notice:** Notice of this request has been provided via legal notice (in the form of Bill Onsert on customer bills) 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.***

## **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**. Please submit the response or protest by email or mail to:

[water.division@cpuc.ca.gov](mailto:water.division@cpuc.ca.gov) , or  
Tariff Unit, Water Division, 3<sup>rd</sup> floor  
California Public Utilities Commission,  
505 Van Ness Avenue, San Francisco, CA 94102



**CALIFORNIA WATER SERVICE COMPANY**

Advice Letter 2564, DREMA Amortization (2023-Aug'2024)

Page 8

On the same date the response or protest is submitted to the Water Division, the respondent or protestant shall send a copy by mail (or e-mail) to Cal Water at the following address:

Natalie Wales  
California Water Service Company  
1720 North First Street,  
San Jose, California 95112  
E-mail: [cwsrates@calwater.com](mailto:cwsrates@calwater.com)

Cities and counties requiring Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division by October 20, 2025, 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/

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Priya Rawal.  
Regulatory Program Manager

Enclosures

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

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

**7. Drought Response Memo Account 2023 – August 2024**

(N)

The following surcharges/surcredits will be applied to the following rate making areas. The duration varies by rate making area, and is set to begin July 1, 2026 to amortize lost revenue incurred for drought activities from 2023 to August 2024 tracked in the Drought Response Memorandum Account (DREMA).

<b>Ratemaking Area</b>	<b>Surcharge (\$/CCF)</b>	<b>Surcredit (Flat Monthly)</b>	<b>Effective Dates</b>
Bakersfield	\$0.0520		07/01/2026 – 06/30/2027
Bay Area Region	\$0.0090		07/01/2026 – 06/30/2027
Bear Gulch	\$0.0527		07/01/2026 – 06/30/2027
Dixon	\$0.2148		07/01/2026 – 06/30/2027
East Los Angeles	\$0.0116		07/01/2026 – 06/30/2027
Kern River Valley		(\$5.80)	07/01/2026 – 06/30/2028
Livermore		(\$2.60)	07/01/2026 <b>One Time Credit</b>
Los Angeles County Region - Antelope Valley		(\$5.86)	07/01/2026 – 06/30/2028
Los Angeles County Region - Palos Verdes	\$0.0934		07/01/2026 – 06/30/2027
Marysville	\$0.0622		07/01/2026 – 06/30/2027
Salinas Valley Region	\$0.0486		07/01/2026 – 06/30/2027
South Bay Region (Dominguez, Hermosa Redondo)	\$0.0562		07/01/2026 – 06/30/2027
Visalia	\$0.0327		07/01/2026 – 06/30/2027
Willows	\$0.1461		07/01/2026 – 06/30/2027
Westlake	\$0.2611		07/01/2026 – 06/30/2027

(N)

**Table of Contents**  
**Rate Schedules**

<u>Sheet Subject Matter</u>	<u>Schedule No.</u>	<u>CPUC Sheet No.</u>	
<b><u>ALL DISTRICTS:</u></b>			
Service to Company Employees	ED-1	5168-W	
Surcharge to Fund Public Utilities Commission Reimbursement Fee	UF	13783-W	
Rate Support Fund (RSF)			
Page 1	RSF	13764-W	
Page 2	RSF	13546-W	
Customer Assistance Program (CAP)			
Page 1	CAP	13009-W	
Page 2	CAP	12547-W	
Page 3	CAP	13767-W	
Page 4	CAP	12549-W	
Additional Surcharges/Surcredits			
Page 1	AS	13561-W	
Page 2	AS	13706-W	
Page 3	AS	13587-W	
Page 4	AS	13793-W	
Page 5	AS	13602-W	
Page 6	AS	13605-W	
Page 7	AS	13774-W	
Page 8	AS	XXXXX-W	(P)
Page 9	AS	XXXXX-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)

**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. 13817-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
<b>Table of Contents</b>				
Page 1	Table of Contents			XXXXX-W (C)
Page 2	Preliminary Statements			13574-W
Page 3	Preliminary Statements			13573-W
Page 4	Preliminary Statements			13781-W
Page 5	Preliminary Statements			13805-W
Page 6	Rate Schedules - All Districts			XXXXX-W (C)
Page 7	Rate Schedules - All Districts			13305-W
Page 8	Rate Schedules - District Specific			13810-W
Page 9	Rate Schedules - District Specific			13760-W
Page 10	Rate Schedules - District Specific			13759-W
Page 11	Rate Schedules - District Specific			13804-W
Page 12	Rate Schedules - District Specific			13772-W
Page 13	Rate Schedules - District Specific			13794-W
Page 14	Service Area Maps			13813-W
Page 15	Service Area Maps			13816-W
Page 16	Service Area Maps			13582-W
Page 17	Rules			13295-W
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			13820-W

(Continued)

<u>(To be inserted by utility)</u>	<u>Issued By</u>	<u>(To be inserted by CPUC)</u>
Advice Letter <u>2564</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

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**Leona Valley Cherry Growers  
Association**  
26201 Tuolumne St  
Mojave, CA 93501

JOSEPH S. LUCIDO  
**Leona Valley Cherry Growers  
Association**  
26201 Tuolumne St  
Mojave, CA 93501

PEGGY FULLER  
**Leona Valley Town Council**  
P.O. Box 795  
Leona Valley, CA 93551  
[pfuller@leonavalleytc.org](mailto:pfuller@leonavalleytc.org)

GABE NEVAREZ, PUBLIC WORKS  
MANAGER  
**City of Lancaster**  
615 West Avenue H  
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[gnevarez@cityoflancasterca.org](mailto:gnevarez@cityoflancasterca.org)

KIKI CARLSON, REGULATORY AFFAIRS  
MANAGER  
**Suburban Water Systems**  
1325 N. Grand Avenue, Suite 100  
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CHRISTIAN HORVATH, CITY CLERK  
**City of Rolling Hills**  
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### ONLY FOR SERVICE AREA MAPS:

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ANTHONY C. MARONE, FIRE CHIEF  
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**CDF, Battalion 11**  
8723 Elizabeth Lake Rd  
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## Bakersfield District

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

DOUGLAS NUNNELEY  
**Oildale Mutual Water Company**  
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**Casa Loma Water Company**  
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CITY MANAGER'S OFFICE  
**City of Bakersfield**  
1600 Truxtun Avenue  
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**Victory Mutual Water Company**  
P.O. Box 40035  
Bakersfield, CA 93304

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DANIEL MALDONADO, WATER  
RESOURCES DEPARTMENT  
**City of Bakersfield**  
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### **ONLY FOR SERVICE AREA MAPS:**

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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

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& Wastewater Resources**  
NSMCO Sanitation District  
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San Mateo, CA 94403  
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RENE RAMIREZ, INTERIM GENERAL  
MANAGER  
**Mid Peninsula Water District**  
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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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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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## Chico District (North Valley Region)

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

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## Dixon District

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

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## Dominguez District (South Bay Region)

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

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

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

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## Hermosa-Redondo District (South Bay Region)

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

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

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

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## Livermore District

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

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

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## Los Altos District

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

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

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## Palos Verdes District (Los Angeles County Region)

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

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

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## Redwood Valley District (Bay Area Region)

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

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

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

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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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