

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 30, 2019

Jeffrey T. Linam
Vice President of Rates & Regulatory
California-American Water Company
4701 Beloit Drive
Sacramento, CA 95838-2434

Dear Mr. Linam,

The Commission has approved California-American Water Company's Advice Letter No. 1264, filed on September 23, 2019, regarding the 2018 Central Satellite WRAM & MCBA.

Enclosed are copies of the following revised tariff sheets for the utility's files:

P.U.C.	
Sheet No.	Title of Sheet
9337-W	Schedule No. CEN-SAT (continued), Central Division District Tariff Area General Metered Service
9338-W	Schedule No. CEN-SAT (continued), Central Division District Tariff Area, General Metered Service
9339-W	Table of Contents, Page 3
9340-W	Table of Contents, Page 1

Please contact Bradley Leong at 415-703-2307, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant
Water & Sewer Advisory Branch
Water Division

Enclosures



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www.amwater.com

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September 23, 2019

ADVICE LETTER NO. 1264

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

California-American Water Company (California American Water) (U210W) hereby submits for review this advice letter including the following tariff sheets applicable to its Central Division District which are attached hereto:

<u>C.P.U.C. Sheet No.</u>	<u>Title of Sheet</u>	<u>Canceling Sheet No.</u>
9337-W	Schedule No. CEN-SAT (continued) Central Division District Tariff Area GENERAL METERED SERVICE	9237-W
9338-W	Schedule No. CEN-SAT (continued) Central Division District Tariff Area GENERAL METERED SERVICE	9173-W
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PURPOSE

The purpose of this advice letter filing is to request recovery of the 2018 WRAM & MCBA balances. This request is in compliance with authorizations of the California Public Utilities Commission as detailed in D.08-11-023, D.12-04-048, D.13-07-041 and D.18-12-021.

BACKGROUND

On November 6, 2008, the Commission issued Ordering Paragraph 1 in D.08-11-023 which adopted a settlement agreement between California American Water and the Division of Ratepayer Advocates (“DRA”) to establish a Pilot Program for a conservation rate structure in the Central Satellite District;

The June 28, 2007 settlement for the Coronado and Village districts, attached to Appendix A, is adopted and the motion to reduce the comment period is granted.

As part of the settlement, California American Water was to establish a WRAM as outlined below from pages 5 and 6 of the agreement.

Decoupling for California American Water will be accomplished through the following mechanisms:

- 1. A Water Revenue Adjustment Mechanism (WRAM) for the Coronado and Village districts.*
- 2. This decoupling mechanism, along with California American Water's Incremental Cost Balancing Accounts (ICBA)¹, will ensure recovery of the adopted fixed costs recovered through the quantity charge, and the actual variable costs for purchased power, purchased water, and pump taxes. The fixed costs not included in these accounts will be recovered through the service charge, which is a monthly charge that customers pay regardless of consumption.*
- 3. In accordance with established Commission practice, the WRAM account will accrue interest at the 90-day commercial paper rate.*

The WRAM will track the difference between the total quantity charge revenues authorized by the Commission ("Total Adopted Quantity Revenues"), and the total revenues actually recovered through the quantity charge based on actual sales ("Total Actual Quantity Revenues"), excluding:

- 1. Revenue from Private Fire Protection Service and;*
- 2. Revenue from the "Other" class of general metered customers.*

California American Water implemented the Pilot Program on February 1, 2009 via Advice Letter 717-A.

Historically, these types of advice letters were submitted by April 30th each year per the settlement agreement adopted in D.08-11-023. On July 25, 2013, modifications to the process were agreed to in D.13-07-041 as part of a settlement in California American Water's 2010 General Rate Case ("GRC") proceeding;

The parties agree that California American Water would use the same amortization schedules and procedures that were established for other Class A water utilities in D.12-04-048 for the WRAM/MCBA in all districts. This includes:

- 1. Amortization of net WRAM/MCBA balances at or above 2% of the last authorized revenue requirement, as described in Ordering Paragraph 2;*
- 2. The process to not initiate the cap until 2015, which is the first test year of the GRC to be filed July 1, 2013, as discussed in Ordering Paragraph 3;...*
- 3. A vigorous review of the WRAM/MCBA as well as sales forecasting to be conducted in the next GRC (Test Year 2015), as discussed in Ordering Paragraph 3;*
- 4. Cal Am will submit its annual request for amortization of net WRAM/MCBA balances by a Tier 1 advice letter on or before March 31, as described in Ordering Paragraph 5;*

The Modified Cost Balancing Account (MCBA) replaced the ICBA through the issuance of D.12-06-016.

5. *California American cannot include any additional type or category of cost in their Tier 1 Advice Letters that was not included in their Annual Report as described in Ordering Paragraph 9;*
6. *California American Water will separate the WRAM/MCBA surcharges on customer bills if it is capable of doing so with its new billing system, as discussed for other utilities in Ordering Paragraph 10.*

Additional criteria on the WRAM amortization process were outlined in D.12-04-048 as follows.

Conclusions of Law

7. *It is reasonable to require that net WRAM/MCBA over-collections be amortized through a surcredit on a customer's service charges and that all under-collections be amortized through a surcharge on the volumetric rate.*
8. *It is reasonable to change the deadline for applicants to submit their annual WRAM/MCBA report from March 31st to the previous November 30th, and to include nine months of recorded data through September 30th in the report.*

Ordering Paragraphs

1. *We adopt the amortization schedule set forth in Appendix A with a cap on total net Water Revenue Adjustment Mechanism/Modified Cost Balancing Account (WRAM/MCBA) surcharges of 10% of the last authorized revenue requirement...WRAM balances incurred prior to the first test year referenced above continue to be amortized under the adopted amortization schedule without being subject to the surcharge cap.*

In addition, D.18-12-021 increases the cap on amortization of the WRAM/MCBA balances:

Ordering Paragraph

151. *The cap on amortization of WRAM/MCBA balances should not be eliminated but should be increased to 15% of the last authorized revenue requirement for each of Cal-Am's districts.*

D.18-12-021 also approved the consolidation of Ambler, Toro, Ralph Lane, and Garrapata for ratemaking and tariff purposes.

Ordering Paragraph

9. *California-American Water Company is authorized to consolidate the Ambler, Toro, Ralph Lane, and Garrapata systems for ratemaking and tariff purposes. California-American Water Company's proposed rate design for these newly consolidated systems is approved.*

On November 7, 2018, prior to issuance of D.18-12-020, California American Water obtained an extension of time to able to file its 2018 WRAM/MCBA annual report and its Tier 1 annual request for amortization of net 2018 WRAM/MCBA balances. Without knowing the interim rate true-up, California American Water was not able to make the necessary calculations to submit these 2018 WRAM/MCBA filings. On August 8, 2019, California American Water received a second extension, to September 23, 2019.

REQUEST

The balances for the WRAM and MCBA are summarized in the table below.

TABLE 4: Recovery of WRAM/MCBA Balances				
DESCRIPTION	Authorized WRAM/MCBA Over/(Under) Collection	Cumulative Interest Earned/ Accrued	Cumulative Surcharge Collections	Balance
Central Satellites				
Authorized Prior Balance Remaining at 12/31/2018	\$0	\$0	\$0	\$0
Estimated Balance not yet Approved for YR 2018	(\$147,875)	(\$780)	\$0	(\$148,655)
UAW Penalty/(Reward)				(\$31,812)
Balance				(\$180,466)
2018 Revenue Requirement				\$1,572,860
2018 Balance % of Revenue				11.5%
Net Balance % of Revenue				11.5%

Based on the above balance and the adopted amortization schedule per D.12-04-048 Appendix A, California American Water requests a volumetric surcharge of \$0.1417 over a 12-month period be added to the Company's tariffs. D.18-12-021 authorized the consolidation of Ambler, Toro, Ralph Lane, and Garrapata for ratemaking purposes. Previous WRAM balances for Toro and Ambler Park will be kept separate from the current Central Satellite WRAM.

TABLE 4: Recovery of WRAM/MCBA Balances				
DESCRIPTION	Authorized WRAM/MCBA Over/(Under) Collection	Cumulative Interest Earned/ Accrued	Cumulative Surcharge Collections	Balance
Ambler				
Authorized Prior Balance Remaining at 12/31/2018	(\$802,087)	(\$17,438)	\$0	(\$819,525)
Estimated Balance not yet Approved for YR 2018	\$0	\$0	\$0	\$0
UAW Penalty/(Reward)				\$0
Balance				(\$819,525)
2018 Revenue Requirement				\$611,840
2018 Balance % of Revenue				-133.9%
Net Balance % of Revenue				-133.9%

TABLE 4: Recovery of WRAM/MCBA Balances				
DESCRIPTION	Authorized WRAM/MCBA Over/(Under) Collection	Cumulative Interest Earned/ Accrued	Cumulative Surcharge Collections	Balance
Toro				
Authorized Prior Balance Remaining at 12/31/2018	(\$456,638)	(\$10,328)	\$0	(\$466,965)
Estimated Balance not yet Approved for YR 2018	\$0	\$0	\$0	\$0
UAW Penalty/(Reward)				\$0
Balance				(\$466,965)
2018 Revenue Requirement				\$847,134
2018 Balance % of Revenue				55.1%
Net Balance % of Revenue				55.1%

SERVICE LIST

Pursuant to Section 4.3 of General Order No. 96-B, a copy of this advice letter is being sent to those entities listed in the attached service list. Copies of the detailed workpapers and the documents supporting this Advice Letter have also been furnished to the Commission Staff.

EFFECTIVE DATE

Cal-Am submits this as a Tier 1 advice letter per D.13-07-041 and requests an effective date of September 24, 2019.

RESPONSE OR PROTEST²

Anyone may submit a response or protest for this AL. 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 AL. A **protest** objects to the AL in whole or in part and must set forth the specific grounds on which it is based. These grounds³ are:

1. The utility did not properly serve or give notice of the AL;
2. The relief requested in the AL 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 AL contain material error or omissions;
4. The relief requested in the AL is pending before the Commission in a formal proceeding;
or
5. The relief requested in the AL requires consideration in a formal hearing, or is otherwise inappropriate for the AL process; or
6. The relief requested in the AL is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require re-litigating a prior order of the Commission.
7. A protest may not rely on policy objections to an AL where the relief requested in the AL follows rules or directions established by statute or Commission order applicable to the utility. A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

DWA must receive a response or protest via email (**or** postal mail) within 20 days of the date the AL is filed. When submitting a response or protest, **please include the utility name and advice letter number in the subject line.**

The addresses for submitting a response or protest are:

Email Address:

Water.Division@cpuc.ca.gov

Mailing Address:

CA Public Utilities Commission
Division of Water and Audits
505 Van Ness Avenue
San Francisco, CA 94102

On the same day the response or protest is submitted to DWA, the respondent or protestant shall send a copy of the protest to California American Water at:

Email Address:

Kamilah.Jones@amwater.com

Mailing Address:

4701 Beloit Drive
Sacramento, CA 95838

sarah.leeper@amwater.com

555 Montgomery Street, Ste. 916
San Francisco, CA 94111

² G.O. 96-B, General Rule 7.4.1

³ G.O. 96-B, General Rule 7.4.2

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform DWA, 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.

REPLIES⁴

The utility shall reply to each protest and may reply to any response. Any reply must be received by DWA within five business days after the end of the protest period, and shall be served on the same day on each person who filed the protest or response to the AL.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Jeffrey T. Linam

Jeffrey T. Linam
Vice President of Rates & Regulatory

⁴ G.O. 96-B, General Rule 7.4.3

Schedule No. CEN-SAT (Continued)
Central Division Tariff Area
GENERAL METERED SERVICE

Sheet 4

SPECIAL CONDITIONS

Fees and Surcharges (continued):

ALL CENTRAL DIVISION TARIFF AREA (Continued)

5. Per Advice Letter 1230-B, the under-collected balance in the Central Division Consolidated Expense Balancing Account will be recovered through a quantity based surcharge of \$0.0840 per 100 gallons over 12 months effective May 1, 2019. This total amount will be recovered from all classes of customers except for Chualar Customers.

6. Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA) Surcharge

D.18-12-021 authorized consolidation of Ambler, Garrapata, Ralph, Lane, and Toro into the Central Division. From January 1, 2018 Central Division has its own WRAM/MCBA. D. 18-12-021 raised the cap on WRAM/MCBA surcharges to 25% of the authorized revenue requirement.

7. Per D.18-12-021 a meter based bill credit for the Excess Non-Plant Accumulated Deferred Income Tax will be refunded to customers over the 24-month period beginning August 1, 2019.

Meter Size	Refunds by Meter Equivalent
5/8 x 3/4	\$0.87
3/4	\$1.30
1	\$2.17
1 1/2	\$4.33
2	\$6.93
3	\$13.00
4	\$21.66
6	\$43.32
8	\$69.32
10	\$99.65

8. A surcharge is included in each bill to recover the net under-collection in the Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA). For the period ending December 31, 2018, the net under-collection totals \$180,466 including interest. The surcharge of \$0.1417 per 100 gallons is set to recover the under-collection at a rate equal to 15% of the authorized revenue requirement as approved by D.18-12-021.

(N)
|
(N)

(Continued)

(TO BE INSERTED BY UTILITY)
Advice 1264
Decision

ISSUED BY
J. T. LINAM
DIRECTOR - Rates & Regulatory

(TO BE INSERTED BY C.P.U.C.)
Date Filed 09/23/2019
Effective 09/24/2019
Resolution _____

Schedule No. CEN-SAT (Continued)
 Central Division Tariff Area
GENERAL METERED SERVICE

Sheet 5

SPECIAL CONDITIONS (Continued)
Fees and Surcharges (continued):

AMBLER PARK SERVICE AREA ONLY

Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA) Surcharge

1. A surcharge is included in each bill to recover the net under-collection in the Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA). For the period ending December 31, 2018, the net under-collection totals \$819,525 including interest. The surcharge of \$0.1862 per 100 gallons is set to recover the under-collection at a rate equal to 15% of the authorized revenue requirement as approved by D.18-12-021. (C)

TORO SERVICE AREA ONLY

Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA) Surcharge

1. A surcharge is included in each bill to recover the net under-collection in the Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA). For the period ending December 31, 2018, the net under-collection totals \$466,965 including interest. The surcharge of \$0.1912 per 100 gallons is set to recover the under-collection at a rate equal to 15% of the authorized revenue requirement as approved by D.18-12-021. (C)

GARRAPATA SERVICE AREA ONLY

1. The Safe Drinking Water State Revolving Fund (SDWSRF) surcharge is in addition to the water bill. This surcharge must be identified on each bill. The surcharge is specifically for the repayment of a loan under the American Recovery and Reinvestment Act for SDWSRF projects authorized by Resolution W-4788, dated September 24, 2009. The surcharge to repay the loan will last until the loan is fully paid. The surcharge rates are subject to periodic adjustment. The monthly surcharge is \$16.62 for years 1-10; and \$15.11 for years 11-19 of the repayment period. The surcharge revenues shall be tracked separately and shall be used only for the repayment for the SDWSRF loan described in Resolution W-4788. This surcharge only applies to customers in the Garrapata service area.

(Continued)

(TO BE INSERTED BY UTILITY)

Advice 1264
 Decision

ISSUED BY

J. T. LINAM
 DIRECTOR - Rates & Regulatory

(TO BE INSERTED BY C.P.U.C.)

Date Filed 09/23/2019
 Effective 09/24/2019
 Resolution _____

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C.P.U.C. SHEET NO.

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(Continued)

(TO BE INSERTED BY UTILITY)

Advice 1264
Decision

ISSUED BY

J. T. LINAM
DIRECTOR - Rates & Regulatory

(TO BE INSERTED BY C.P.U.C.)

Date Filed 09/23/2019
Effective 09/24/2019
Resolution _____

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(TO BE INSERTED BY UTILITY)	ISSUED BY	(TO BE INSERTED BY C.P.U.C.)
Advice 1264	J. T. LINAM	Date Filed <u>09/23/2019</u>
Decision	DIRECTOR - Rates & Regulatory	Effective <u>09/24/2019</u>
		Resolution _____

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ADVICE LETTER 1264

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c/o Community Development Department
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Pacific Grove, CA 93950

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CALIFORNIA-AMERICAN WATER COMPANY
ADVICE LETTER 1264

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MONTEREY COUNTY DISTRICT SERVICE LIST
CALIFORNIA-AMERICAN WATER COMPANY
ADVICE LETTER 1264

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