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January 4, 2021

California Public Utilities Commission  
Water Division  
Room 3102, State Building  
505 Van Ness Ave.  
San Francisco, CA 94102-3298

Dear Division of Water and Audits:

Enclosed please find an original and three copies of Advice Letter No. 1320. Along with the Advice Letter, two copies of the work papers have been enclosed as well.

Regards,

/s/ Kamilah Jones

Kamilah Jones  
Financial Analyst III - Rates & Regulatory

CC: Richard Rauschmeier, California Public Utilities Commission, The Public Advocates Office, 505 Van Ness Ave., San Francisco, CA 94102-3298





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January 4, 2021

ADVICE LETTER NO. 1320

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

California-American Water Company (U210W) hereby submits for review this advice letter, including the following attached tariff sheets applicable to its California Districts.

**Purpose:**

The purpose of this advice letter is to comply with Ordering Paragraph 5 of D.20-08-047 which directs California American Water to outline a pilot program that provides a discount to water users in low-income multifamily buildings. California American Water proposes four individual targeted benefits to comply with the request to outline a pilot program. California American Water puts forth these four targeted benefits because it believes together these benefits will provide the best opportunity to explore the potential benefits and challenges of addressing the needs of low-income multi-family water users currently behind a master meter.

The benefits and challenges of developing a water rate assistance program for residents who are behind a master meter, and thus not responsible for paying their water bill, has been widely discussed in recent years. In addition to ratepayer assistance discussions in the Commission's current Low-Income Ratepayer Assistance Order Instituting Rulemaking, R.17-06-024 ("LIRA OIR"), the State Water Resources Control Board ("Water Board") was tasked with examining how to improve water rate assistance with the passage of Assembly Bill ("AB") 401 in 2015. Water Board members, staff and a multi-disciplinary working group that included Commissioners, Staff and regulated water utilities helped develop a report in response to AB 401. In February 2020 the "AB 401 Report" was presented to the Legislature. One component of the AB 401 Report is a recommendation to develop a renters' tax credit to offset the cost of water service for renters who are served through a master meter or are not connected to a community water system.

The AB 401 Report estimates that as many as 44 percent of residential water users in California do not pay their own water bill and that as many as 60 percent of low income Californians are not responsible for paying a water bill directly. These statistics highlight how expanding ratepayer assistance programs to disadvantaged Californians who are not ratepayers would provide benefits to many families.

The AB 401 report is candid in its assessment of the challenge:

While there is no perfect approach to delivering affordability assistance to low-income households which do not directly hold accounts with CWS [community water systems], the renter's water credit approach is feasible because it relies on an existing, successful benefit delivery mechanism instead of creating a new one.

Moreover, its advantages outweigh the disadvantages of alternative approaches such as direct cash assistance (cash, check, electronic bank transfer, other) to eligible households via a new state fund, or working with stakeholders to develop an expanded EBT program that could be safely accessed by all low-income households. (SWRCB Low Income Rate Assistance Final Report, Page 34)

California American Water proposes a multi-pronged approach to delivering benefits in this advice letter because there is no “silver bullet” to address this challenge. California American Water believes that the different housing types and residents who reside in them provide different opportunities to chip away at the issue. Given the amount of study and thinking that has gone into the problem in California by academics, government leaders, advocates and service providers the only clear model that has emerged is one in which a benefit is provided through tax credit and water utilities are not involved.

Nonetheless, California American Water is prepared to work “outside the box” and innovate solutions which is why a multi-pronged approach makes sense for a pilot study. We believe that each component will provide an opportunity to evaluate the efficacy of the solution. The actual benefits delivered to low income residents in multi-family housing should be balanced by the cost, effort and efficiency of benefit delivery methods. This data will help inform future programs for California American Water customers and will also be useful in any number of larger policy efforts in the coming years. As always, scale is important because unlike the energy sector, where a handful of utilities serve most Californians, there are over 400 medium and large water utilities in the state and thousands of smaller systems. California American Water has been a leader in water affordability since introducing the first ratepayer assistance program in the state in 1996 and believes this filing is an important opportunity to further the policy discussion in the state.

**Background:**

Ordering Paragraph 5 of D.20-08-047, issued on September 3, 2020, states:

California-American Water Company shall file a Tier 3 advice letter, within 120-days of the issuance of this decision, outlining a pilot program that provides a discount to water users in low-income multi-family through their housing providers.

D.20-08-047 also directed California American Water to use the pilot program outlined in AL 1221 as a starting point for its pilot proposals. Specifically, Finding of Fact No. 23 provides:

California-American Water Company’s Advice Letter 1221 for establishing a tariff that provided a discount to low-income multi-family renters through their housing providers establishes a good starting point for a pilot.

In AL 1221 California American Water requested extending Low-Income Ratepayer Assistance (“LIRA”)<sup>1</sup> programs to master metered Affordable Housing Facilities in its Monterey Service area. The proposal extended rate relief to providers/owners, mitigating cost impacts to low-income housing providers, in cases where lease payments, including utilities, are set by government regulation and potential rate increases cannot be passed on to tenants. Eligibility would be based on the California Tax Credit Allocation Committee (“TCAC”). Ultimately, advice Letter was rejected by the CPUC.

Below are the proposed four targeted solutions for the Commission’s review and approval. As stated above, California American Water believes that each component of the overall program (1) supports the aim of extending assistance to residents of multifamily properties, and (2) may provide insight on possible solutions to address the needs of low income water users that reside behind a master meter and thus currently do not qualify for California American Water’s LIRA benefit.

### **Program Component 1 – Multifamily Housing in Disadvantaged Communities – San Diego Service Area**

Program Component 1 would be applicable only to master metered buildings in a disadvantaged or severely disadvantaged community (“DAC/SDAC”) in California American Water’s San Diego Service Area. Under this component, California American Water would target one or more master metered building(s) in a disadvantaged or severely disadvantaged community (“DAC/SDAC”) and establish a partnership to provide Low-Income Ratepayer Assistance program discounts to tenants. This program component would deliver assistance directly to a tenant through a partnership between California American Water and a Community Based-Organization (“CBO”). California American Water intends to use data from the CARE data share with energy companies to identify properties that have individually metered units for energy. Through this process, California American Water may be able to identify water master metered properties with tenants that are qualified for the CARE program. California American Water would use the CARE data share methodology and provide discounts for eligible tenants to a CBO which would then pass the credit directly to the tenant. California American Water currently uses a CBO to administer its crisis assistance fund in Monterey and would build on this experience including developing an agreement to supply reasonable administrative costs.

Eligible tenants would receive the LIRA discount in the applicable service area which includes a meter-based discount and a discount on volumetric charges.

This program will require building partnerships with local CBOs. Resources will need to be devoted to building and maintaining these partnerships and tracking and verifying that discounts are reaching eligible tenants.

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<sup>1</sup> D.20-08-047 ordered regulated water utilities to name or rename low-income ratepayer assistance programs “Customer Assistance Program” or (“CAP”). California American Water is putting together a filing which will change the name of its Low-Income Ratepayer Assistance Programs (“LIRA”) to CAP on all applicable tariffs and forms. For the purposes of this filing, California American Water uses the LIRA classification to be consistent with current tariffs.

California American Water would track costs within a separate sub-account of its LIRA Balancing account.

### **Program Component 2 – Multifamily Low-Income Housing Tax Credit Recipients – Sacramento and Monterey Service Areas**

Program Component 2 would provide a discount directly to non-profit and for-profit affordable housing properties in California American Water's Sacramento and Monterey Service Areas that receive the California Low-Income Housing Tax Credit for all units. California American Water has identified 39 candidate properties, 31 in Sacramento and 8 in Monterey, that would be eligible to receive this discount. The utility portion of customer rent in these properties is generally fixed, so rather than providing the discount to tenants, the discount would go to the building owner with the aim of assisting the financial viability and availability of affordable housing in California American Water's service areas.

California American Water has had several conversations with the California Housing Partnership and the California Housing Consortium both of which are supportive of this program component as a means to support the availability of affordable housing in California and with the hope that discounts for affordable housing providers could be expanded across the state.

Eligible master metered account holders would receive the LIRA discount in the applicable service area which includes a meter-based discount and a discount on volumetric charges. Master metered multi-residential buildings are billed under one quantity rate in all California American Water service areas except for Monterey. In Monterey, some buildings may be billed under a multi-residential rate which is a tiered rate. The volumetric rate discount would apply to all usage in both Sacramento and Monterey.

This program will require resources for building and maintaining relationships with willing property owners. It will also require verification of current and ongoing affordable housing tax credit status for 100 percent of the units. To be eligible for this benefit the housing provider must have a minimum of five years remaining on affordable housing deed restrictions for the property. Requiring there be a minimum length of time remaining on deed restrictions provides the best assurance that this benefit will allow housing providers to continue to support the operations and maintenance of affordable housing in the state. This program will apply to eligible tax credit recipient properties in California American Water's Sacramento and Monterey service areas.

Like Program Component 1, California American Water would track costs within a separate sub-account of its LIRA Balancing account.

### **Program Component 3 – Meter Retrofit for Fruitridge Vista Multifamily units**

For Program Component 3, California American Water would identify suitable duplex and four unit multifamily buildings in its Fruitridge Vista Service Area and install individual meters. By installing individual meters, multifamily building tenants would be able to take advantage of the full menu of services offered by California American Water. These services include ratepayer assistance programs, conservation programs and services, payment options and arrangements including payment plans and budget billing, and improved information about water quality including Consumer Confidence Reports and water quality and service emergency notifications.

California American Water acquired the Fruitridge Vista system in February 2020. The Fruitridge Vista system has around 4,400 customers of which almost 3,200 are unmetered. The California Department of Water Resources identifies the Fruitridge Vista Service Area as a “severely disadvantaged community”. California American Water is beginning a meter installation program in Fruitridge Vista, and under Program Component 3 would identify certain multifamily units where the configuration makes installing individual meters practical at a cost similar to installing a meter for single family homes. This service area has approximately 150 duplexes and 50 multifamily buildings which contain four units and a common hot water and laundry facility for each building. Typically, in the Sacramento service area these types of buildings will have individual meters installed. This meter installation expansion could be performed under the current meter installation project, however there would be additional incremental costs associated with installing these meters. California American Water currently estimates a cost for materials and construction of \$6,945 for each single-family property in its meter retrofit program, so a similar incremental cost for each unit in a multi-family building could be expected.

During the previous meter retrofit program for its Sacramento District from around 2003 to 2013, California American Water was successful in placing individual meters for a number of similar units. The total number of individual units that could be individually metered in Fruitridge Vista is unknown at this time because some customer plumbing configurations do not easily lend themselves to this type of meter retrofit work and would remain master metered. Our engineering and construction teams believe the main limiting factor is the configuration of the plumbing between each unit and the property line.

California American Water requests authority to establish a memorandum account to track incremental costs associated with installing meters in these multifamily properties.

#### **Program Component 4 – Low-Income Joint Water and Energy Install Program – Recently Acquired Systems**

This Program Component would expand existing water energy retrofit programs that are currently conducted jointly with energy providers to multifamily buildings and mobile home parks. The program that currently extends hot and cold-water measures including appliances, fixtures, and weatherization to low income housing is funded jointly by California American Water and the energy utilities and has predominantly been utilized by single family dwelling households. Typically, the participating energy utility covers the cost of hot water measures such as water heater, showerhead and washing machine upgrades with the water utility covering cold water measure costs such as toilet upgrades, aerators and leak repairs. This program would explore extending the program reach to multifamily buildings and mobile home parks, both master metered and individually metered. Similar to Program Component 1, California American Water would use CARE data to identify tenants that are in individually metered units for electricity, but are master metered for water to qualify them for this program. The extent of program benefits and upgrade measures for each tenant would be based on condition and age of the applicant’s current fixtures and appliances and any previous program participation. Tenants would directly benefit from the measures and owners would benefit from lower water bills. The program will target the recently acquired service areas of Meadowbrook, Hillview, and Dunnigan.

This is a comprehensive program with significant associated costs. California American Water would need to devote resources to identify willing owners, maintain these relationships, and roll out the program. The program budget would not exceed \$200,000.

Like components 1 and 2, California American Water would track costs within a separate sub-account of its Low-Income Ratepayer Assistance Program (“LIRA”) Balancing account .

**Request:**

Approval to implement the pilot program, including all four components, described herein. California American Water proposes that a report be prepared 12 months after the implementation of the first two project components to examine their effectiveness and will also report on the progress of implementing the third and fourth components. The third component will continue until the meter retrofit project in Fruitridge Vista is completed in 2023 and the fourth component will continue until the end of the 2023 or the approved funding amount is exhausted.

California American Water requests the following tariff changes:

- Modify the language on the Low-Income Ratepayer Assistance (LIRA) Balancing Account preliminary statement to create a subaccount within to record and recover the low-income discounts and incremental costs associated with components 1, 2 and 4 herein.
- Create a Fruitridge Vista Multi-family Meter Retrofit Memorandum Account (“MFMRMA”) preliminary statement which will track the incremental capital necessary to separately meter individual dwelling units on target properties located within a disadvantaged community.
- Modify LIRA-Tariff in the following manner:
  - Modify special condition applicability language in the CA-LIRA tariff.
  - Add special condition language outlining the pilot program, including the four program components.
  - Add LIRA rates based on commercial service and volumetric charges for applicable pilot-program service areas.

**Tier Designation:**

This advice letter is submitted with a Tier 3 designation.

**Effective Date:**

Given the this is a Tier 3 filing and requires a Commission resolution, California American Water does not request a specific effective date. However, given the current economic crisis, likely legislative action as a result of the AB 401 Report and the ongoing proceedings related to water affordability that will benefit from additional data we believe this advice letter should be expedited and approved as soon as possible.

**Service List:**

In accordance with Section 4.3 of General Order 96-B, a copy of this advice letter has been served upon all interested and affected parties as shown in Exhibit A.



**Protests and Responses:**

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 errors 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 address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3<sup>rd</sup> 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:

**Recipients:**  
CA Rates  
.....

**E-Mail:**  
[ca.rates@amwater.com](mailto:ca.rates@amwater.com)  
.....

**Mailing Address:**  
4701 Beloit Drive  
Sacramento, CA 95838  
Fax: (916) 568-4260

Sarah E. Leeper ..... <i>Vice President – Legal, Regulatory</i>	<a href="mailto:sarah.leeper@amwater.com">sarah.leeper@amwater.com</a> .....	333 Hayes Street, Ste. 202 San Francisco, CA 94102 Fax: (415) 863-0615
Kamilah Jones ..... <i>Senior Financial Analyst – Rates &amp; Regulatory</i>	<a href="mailto:Kamilah.jones@amwater.com">Kamilah.jones@amwater.com</a> .....	4701 Beloit Drive Sacramento, CA 95838 Fax: (916) 568-4232

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.

If you have not received a reply to your protest within 10 business days, contact this person at (916) 568-4232.

CALIFORNIA-AMERICAN WATER COMPANY

*/s/ Kamilah Jones*

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Kamilah Jones  
Senior Financial Analyst - Rates & Regulatory

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
XXXX-W	PRELIMINARY STATEMENT (Continued) Sheet 1	9648-W
XXXX-W	PRELIMINARY STATEMENT (Continued) Sheet 1	
XXXX-W	Schedule No. CA-LIRA California American Water LOW INCOME RATEPAYER ASSISTANCE PROGRAM Sheet 1	XXXX-W
XXXX-W	Schedule No. CA-LIRA California American Water LOW INCOME RATEPAYER ASSISTANCE PROGRAM Sheet 8	9751-W
XXXX-W	Schedule No. CA-LIRA California American Water LOW INCOME RATEPAYER ASSISTANCE PROGRAM Sheet 12	9755-W
XXXX-W	Schedule No. CA-LIRA California American Water LOW INCOME RATEPAYER ASSISTANCE PROGRAM Sheet 13	

PRELIMINARY STATEMENT  
Summary Table

Sheet 1

Reference	Account	Tariff
A	Territory Served by Utility	9631-W
B	Types and Classes of Service	9631-W
C	Description of Service	9632-W
D	Procedure to Obtain Service	9632-W
E	Symbols	9632-W
F	Affiliate Transaction Rule IV.D.2 Memorandum Account (ATMEMO)	9633-W
G	Catastrophic Event Memorandum Account (CEMA)	9634-W, 9635-W, 9636-W
H	CAW Conservation Surcharge Balancing Account	9637-W
I	Cease and Desist Order Memorandum Account (CDOMA)	9638-W
J	Cease and Desist Order - Penalties and Fines Memorandum Account	9639-W
K	Chromium-6 Memorandum Accounts - Los Angeles County and Sacramento Districts	9640-W, 9641-W
L	Consolidated Expense Balancing Account	9642-W
M	Emergency Rationing Costs Incurred by CAW Memorandum Account	9643-W
N	Endangered Species Act (ESA) Memorandum Account (Monterey Main Service Area)	9644-W
O	Garrapata Service Area Memorandum Accounts	9645-W
P	Garrapata Service Area - SDWSRF Loan Repayment Balancing Account	9646-W
Q	MPWMD Conservation Balancing Account	9647-W
R	Low-Income Ratepayer Assistance Program (LIRA) Balancing Account	XXXX-W, XXXX-W
S	NOAA_ESA Memorandum Account	9650-W
T	Other Post-Employment Benefits Balancing Account	9651-W
U	Pension Balancing Account (PBA)	9652-W
V	San Clemente Dam Balancing Account	9653-W
W	Coastal Water Project Memorandum Account	9654-W
X	Seaside Basin Adjudication Balancing Account	9655-W
Y	Seaside Groundwater Basin Balancing Account	9656-W
Z	Water Contamination Litigation Expense Memorandum Account ("WCLEMA")	9657-W
AA	West Placer Memorandum Account	9658-W
AB	Water Revenue Adjustment Mechanism/Modification Cost Balancing Account ("WRAM/MCBA")	9659-W, 9660-W, 9661-W, 9662-W
AC	Leak Adjustment Memorandum Account	9663-W
AD	Water Cost if Capital Adjustment Mechanism	9664-W
AE	Credit Card Fee Memorandum Account	9665-W
AF	Purchased Water, Purchased Power, and Pump Tax Balancing Account	9666-W

(C)

(Continued)

(TO BE INSERTED BY UTILITY)		ISSUED BY	(TO BE INSERTED BY C.P.U.C.)	
Advice	1320	J. T. LINAM	Date Filed	_____
Decision		DIRECTOR - Rates & Regulatory	Effective	_____
			Resolution	_____

PRELIMINARY STATEMENT  
Summary Table

Sheet 2

Reference	Account	Tariff
AG	School Lead Testing Memorandum Account (SLTMA)	9667-W
AH	The Memorandum Account for Environmental Improvement and Compliance Issues for Acquisitions	9668-W
AI	Dunnigan Consulting Memorandum Account	9669-W
AJ	Water-Energy Nexus Program Memorandum Account (WENMA)	9670-W
AK	Special Facilities Fee Memorandum Account	9671-W
AL	Monterey Service Area Pre-2015 Residential Water Revenue Adjustment Mechanism/Modified Cost Balancing Account ("WRAM/MCBA") Under-collection/recovery Balancing Account	9673-W
AM	Monterey Service Area Pre-2015 Non-Residential Water Revenue Adjustment Mechanism/Modified Cost Balancing Account ("WRAM/MCBA") Under-collection/recovery Balancing Account	9674-W
AN	Public Safety Power Shut-Off Memorandum Account (PSPSMA)	9675-W, 9676-W
AO	General Rate Case Interim Rate True-up Memorandum Account	9677-W
AP	Central Division Leak Adjustment Balancing Account	9678-W
AQ	Two-Way Tax Accounting Memorandum Account (TMA)	9679-W
AR	Sustainable Groundwater Management Act Memorandum Account (SGMA)	9680-W
AS	Group Insurance Balancing Account (GIBA)	9681-W
AT	Rio Plaza Groundwater Management Memorandum Account	9682-W
AU	Rio Plaza Transaction Memorandum Account	9683-W
AV	MPSWP Phase 1 Project Cost Memorandum Account (PCMA)	9684-W
AW	MPSWP Operations and Maintenance Memorandum Account (MOMMA)	9685-W
AX	Meadowbrook CIAC Regulatory Asset	9686-W
AY	All District Conservation Rationing Memorandum Account	9687-W
AZ	Monterey Wastewater Purchased Power Balancing Account	9688-W
BA	Sand City Desalination Plant Purchased Water Balancing Account (SCDPPWBA)	9689-W
BB	Chromium-6 Balancing Account	9690-W
BC	Fruitridge Vista Meter Installation Memorandum Account (FVMIMA)	9691-W
BD	Fruitridge Vista Transaction Memorandum Account (FVTMA)	9692-W
BE	Sacramento Service Area Voluntary Conservation or Mandatory Rationing Memorandum Account (VCMRMA)	9693-W
BF	Hillview Service Area Memorandum & Balancing Accounts	9758-W
BG	Hillview Memorandum Account for Deferred Income Taxes (HMADIT)	9759-W
BH	Fruitridge Vista Multifamily Meter Retrofit Memorandum Account (MFMRMA)	XXXX-W

(N)

(Continued)

(TO BE INSERTED BY UTILITY)		ISSUED BY	(TO BE INSERTED BY C.P.U.C.)	
Advice	1320	J. T. LINAM	Date Filed	_____
Decision		DIRECTOR - Rates & Regulatory	Effective	_____
			Resolution	_____

PRELIMINARY STATEMENT  
(Continued)

Sheet 1

**R. Low-Income Ratepayer Assistance Program (“LIRA”) Balancing Account**

**1. PURPOSE:**

The purpose of the LIRA Balancing Account is to track the LIRA discounts provided, the LIRA surcharges collected, and to adjust the LIRA surcharges on January 1 of each year. The surcharge will be applicable to all non-low-income water and wastewater customers. California American Water was granted authority to continue this account in Decision (D.) 18-12-021. Decision (D.) 20-08-047 ordered California American Water to implement a pilot program providing low-income customer discounts for water users in master metered multi-family housing. This balancing account contains a sub-account which records low-income discounts and incremental costs associated with the: 1) San Diego Service Area Multifamily Housing in Disadvantaged Communities Program, 2) Sacramento and Monterey Service Area Multifamily Low-Income Housing Tax Credit Recipients Program, and 3) Low-Income Joint Water and Energy Install Program in Recently Acquired Systems. Specifics of the pilot program are included in California American Water Low-Income Ratepayer Assistance Program tariff. This pilot will run from the time of actual implementation of all components of the pilot program for a period of 12-month period, after which time a report will be submitted to the Commission. However, the component costs and low-income discounts will continue to be tracked in this account until such time as the Commission approves the component to become a permanent part of the low income program, or rejects the particular component and all customers currently receiving discounts from the program are notified 3-months in advance of the termination of the program component. Costs accumulated in this subaccount will be recovered as part of the annual surcharge in the first Rate Case after the Commission rejects, partially accepts/rejects or fully accepts the components of the pilot program.

(N)  
|  
(N)

**2. APPLICABILITY:**

All areas served by California American Water.

**3. ANNUAL SURCHARGE ADJUSTMENT:**

The surcharge will be evaluated and adjusted annually in the annual Step Rate filings and will reflect:

- a. A forecast of the December 31st balance in the LIRA for the current year that reflects.
  - i. The most recent recorded balance;
  - ii. The assumption that the proportion of LIRA to non-LIRA residential enrollment in September will remain constant as a proportion of adopted numbers for October through December; and
  - iii. The assumption that current LIRA surcharges will be applied to the estimated non-LIRA portion of adopted sales (adopted sales minus estimated LIRA sales based on the proportion of LIRA to non-LIRA residential customers in September), plus interest; and

(Continued)

(TO BE INSERTED BY UTILITY)		ISSUED BY	(TO BE INSERTED BY C.P.U.C.)	
Advice	1320	J. T. LINAM	Date Filed	_____
Decision		DIRECTOR - Rates & Regulatory	Effective	_____
			Resolution	_____

PRELIMINARY STATEMENT  
(Continued)

Sheet 2

**R. Low-Income Ratepayer Assistance Program (“LIRA”) Balancing Account (continued):**

b. A forecast of the December 31 balance in the LIRA for the following year that reflects:

- i. The assumption that the proportion of LIRA to non-LIRA residential enrollment in September of the previous year will remain constant as a proportion of adopted numbers; and
- ii. The assumption that the new surcharges will be applied to the estimated non-LIRA portion of adopted sales (adopted sales minus estimated LIRA sales based on the proportion of LIRA to non-LIRA residential customers in September of the previous year), plus interest.

(L)  
|  
(L)

**4. ACCOUNTING PROCEDURE:**

The following entries will be recorded continued with the date of Decision (D.) 18-12-021:

- a. A debit entry equal to the recorded customer discounts.
- b. A credit entry equal to the surcharges collected from the customers not qualified to participate in the LIRA.
- c. A debit or credit entry equal to interest on the balance in the account at the beginning of the month and half the balance after the above entries, at a rate equal to one-twelfth of the rate on 90-day non-financial Commercial Paper, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

**5. RATEMAKING PROCEDURE:**

Low income discount of 20%, for all districts except for the Monterey Service Area within Central Division, shall be applied to all monthly service fees, the tier one billed usage amount and the tier two usage amount. A low-income discount of 30% for Monterey Service Area shall be applied to all monthly service fees, and the first four tiers billed usage. Surcharges will be evaluated and adjusted annually in the annual Step Rate filings to ensure appropriate collection.

(Continued)

(TO BE INSERTED BY UTILITY)		ISSUED BY	(TO BE INSERTED BY C.P.U.C.)	
Advice	1320	J. T. LINAM	Date Filed	_____
Decision		DIRECTOR - Rates & Regulatory	Effective	_____
			Resolution	_____

655 W. Broadway, Suite 1410  
 San Diego, CA 92101

PRELIMINARY STATEMENT  
 (Continued)

Sheet 1

**BH. Fruitridge Vista Multifamily Meter Retrofit Memorandum Account (MFMRMA)**

(N)

**1. PURPOSE:**

The purpose of the Fruitridge Vista Multifamily Meter Retrofit Memorandum Account is to track the incremental costs incurred to individually meter the currently master-metered duplex and multi-plex units in the newly acquired Fruitridge Vista service area. The Fruitridge system has around 4,400 customers of which almost 3,200 are unmetered. California-American Water is currently authorized, and must by law, install meters on all current unmetered services by 2025. This program will run for three years from 2021 to 2023 and California-American Water Company (California American Water) will track all incremental costs, above those already authorized to convert the current meters, including those that are master metered and will be this program become individually metered, in this account and request recovery of the tracked costs through a Tier 3 advice letter to place into rates the cost tracked to the MFMRMA, according to the procedures described below. The cost associated with the MFMRMA will be recovered from non-low-income customers on a statewide basis.

**1. APPLICABILITY:**

Applicable to the Fruitridge Vista Service Area.

**2. ACCOUNTING PROCEDURE:**

During the three year program period from 2021 to 2023, the "incremental costs", those costs to individually meter currently master metered services, will be tracked in this account including: engineering, design, permitting, construction, capital carrying, labor, overhead, operations and maintenance, and capital related costs (including return on investment, income taxes, ad valorem tax, depreciation, and other taxes and fees), as well as, Allowance for Funds Used During Construction ("AFUDC") on the capital investment that are over and above those that the Commission has approved for recovery through base rates.

- a. A debit or credit entry equal to incremental expenses, as described above;
- b. A debit or credit entry equal to the incremental revenue requirement of each operationally in-service and closed to plant capital investment for meters (including return on investment, income taxes, ad valorem tax, depreciation, and other taxes and fees), as described above;
- c. A monthly debit or credit entry equal to the average balance in each segment of the account multiplied by 1/12th of the most recent month's interest rate on Commercial Paper (prime, 90-day) published in the Federal Reserve Statistical Release H-15.
- d. Account balances will be amortized as part of a general rate case or via advice letter, at the Company's discretion, per Standard Practice U-27-W.

**3. RATEMAKING PROCEDURE:**

Currently there is no ratemaking component to this memorandum account. Request for recovery of any balances may be made through a one-time Tier 3 advice letter or through California American Water's next GRC and are to be processed according to General Order 96-B and Standard Practices or otherwise determined in a Commission decision. Upon Commission review and approval, of balances. Cost incurred will be collected statewide for this memorandum account.

(N)

(Continued)

(TO BE INSERTED BY UTILITY) Advice      1320 Decision	ISSUED BY J. T. LINAM DIRECTOR - Rates & Regulatory	(TO BE INSERTED BY C.P.U.C.) Date Filed _____ Effective      _____ Resolution      _____
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Schedule No. CA-LIRA  
California American Water  
LOW INCOME RATEPAYER ASSISTANCE PROGRAM

Sheet 1

APPLICABILITY

Applicable to individually metered and flat rate residential customers, qualified non-profit group living facilities, qualified agricultural employee housing facilities, and migrant farm worker housing centers, and qualified Multifamily housing providers under the Multi-family Ratepayer Assistance Pilot Program where the customer meets all the special conditions of this schedule. (N)

TERRITORY

All territories served by California American Water Company

RATES:

**Northern Division:**

**Sacramento Service Area**

Quantity Rates:

	<u>Base Rate</u> <u>Per 100 gal (CGL)</u>	
For the first 74.8 CGL .....	\$0.3170	(P)
For next 74.8 CGL .....	\$0.4250	(P)
For all water delivered over 149.6 CGL.....	\$0.8315	(P)

Multi-Family Pilot Customers: \$0.3696 (N)

Service Charge: General Metered

	<u>Per Meter Per Month</u>	
For 5/8 x 3/4-inch meter.....	\$11.94	(P)
For 3/4-inch meter.....	\$17.92	
For 1-inch meter.....	\$29.86	
For 1-1/2-inch meter.....	\$59.71	
For 2-inch meter.....	\$95.53	
For 3-inch meter.....	\$179.12	
For 4-inch meter.....	\$298.54	
For 6-inch meter.....	\$597.08	
For 8-inch meter.....	\$955.33	
For 10-inch meter.....	\$1,373.28	
For 12-inch meter.....	\$2,567.44	(P)

**Larkfield Service Area**

Quantity Rates:

	<u>Base Rate</u> <u>Per 100 gal (CGL)</u>	
For the first 52.4 CGL .....	\$0.7204	(P)
For the next 52.4 CGL.....	\$0.7788	
For the next 139.4 CGL.....	\$1.3849	(P)
For all water delivered over 243.9 CGL.....	\$1.8010	

(Continued)

<u>(TO BE INSERTED BY UTILITY)</u>	<u>ISSUED BY</u>	<u>(TO BE INSERTED BY C.P.U.C.)</u>
Advice 1320	J. T. LINAM	Date Filed _____
Decision	DIRECTOR - Rates & Regulatory	Effective _____
		Resolution _____

Schedule No. CA-LIRA  
California American Water  
LOW INCOME RATEPAYER ASSISTANCE PROGRAM

Sheet 4

RATES:

**Central Division:**

**Monterey Service Area**

Residential Quantity Rates:

	<u>Base Rate</u> <u>Per 100 gal (CGL)</u>	
For the first 29.9 CGL.....	\$0.6260	(P)
For the next 29.9 CGL.....	\$0.9389	
For the next 44.9 CGL.....	\$2.1909	
For the next 67.3 CGL.....	\$4.0688	
For all water over 172.0 CGL.....	\$7.1539	(P)

Multifamily Pilot Quantity Rates:

	<u>Base Rate</u> <u>Per 100 gal (CGL)</u>	
For the first 29.9 CGL.....	\$0.5959	(N)
For the next 29.9 CGL.....	\$0.8939	
For the next 44.9 CGL.....	\$2.0858	
For the next 67.3 CGL.....	\$5.5337	
For all water over 172.0 CGL.....	\$6.8107	(N)

Service Charge: General Metered

	<u>Per Meter</u> <u>Per Month</u>	
For 5/8 x 3/4-inch meter.....	\$15.03	(P)
For 3/4-inch meter.....	\$26.32	
For 1-inch meter.....	\$52.60	
For 1-1/2-inch meter.....	\$164.91	
For 2-inch meter.....	\$281.45	
For 3-inch meter.....	\$527.71	
For 4-inch meter.....	\$923.50	
For 6-inch meter.....	\$1,978.93	
For 8-inch meter.....	\$3,166.29	(P)

**Central Satellite -- Ambler Park, Toro, Ralph Lane, Garrapata Service Areas**

Quantity Rates:

	<u>Base Rate</u> <u>Per 100 gal (CGL)</u>	
For the first 59.8 CGL.....	\$0.5239	(P)
For the next 74.8 CGL.....	\$0.8731	
For the next 650.8 CGL.....	\$1.0478	
For all water over 785.4 CGL.....	\$1.9100	(P)

(Continued)

(TO BE INSERTED BY UTILITY)	ISSUED BY	(TO BE INSERTED BY C.P.U.C.)
Advice      1320	J. T. LINAM	Date Filed      _____
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Schedule No. CA-LIRA  
California American Water  
LOW INCOME RATEPAYER ASSISTANCE PROGRAM

RATES (Continued):

**Rio Plaza Service Area**

Quantity Rates:

	<u>Base Rate</u> <u>Per 100 gal (CGL)</u>	
For the first 45 CGL.....	\$0.1569	(P)
For the next 45 CGL.....	\$0.2543	(P)
For all water delivered over 90 CGL.....	\$0.4546	(P)

Service Charge: General Metered

	<u>Per Meter</u> <u>Per Month</u>	
For 3/4-inch meter.....	\$24.18	 (P)
For 1-inch meter.....	\$40.32	
For 1-1/2-inch meter.....	\$80.61	
For 2-inch meter.....	\$129.03	
For 3-inch meter.....	\$241.88	
For 4-inch meter.....	\$403.12	

**San Diego Service Area**

Quantity Rates:

	<u>Base Rate</u> <u>Per 100 gal (CGL)</u>	
For the first 59.8 CGL.....	\$0.6199	 (P)
For the next 52.4 CGL.....	\$0.6966	
For the next 112.2 CGL.....	\$1.2821	
For all water delivered over 224.4 CGL.....	\$1.7218	(P)

Multi-Family Pilot Customers

\$0.6884 (N)

Service Charge: General Metered

	<u>Per Meter</u> <u>Per Month</u>	
For 5/8 x 3/4-inch meter.....	\$6.04	 (P)
For 3/4-inch meter.....	\$9.06	
For 1-inch meter.....	\$15.11	
For 1-1/2-inch meter.....	\$30.21	
For 2-inch meter.....	\$48.34	
For 3-inch meter.....	\$90.64	
For 4-inch meter.....	\$151.07	
For 6-inch meter.....	\$302.13	
For 8-inch meter.....	\$483.41	
For 10-inch meter.....	\$694.91	

(Continued)

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		Resolution _____

Schedule No. CA-LIRA  
California American Water  
LOW INCOME RATEPAYER ASSISTANCE PROGRAM

**SPECIAL CONDITIONS APPLICABLE TO LOW INCOME (Continued):**

(L)

**General Items:**

(L)

3. **Low-Income Ratepayer Assistance Program (LIRA) for Nonprofit Group Living Facilities:**  
(Continued)

4. Additional requirements:

**Group living facilities** must provide special-needs social services such as meals or rehabilitation and may have satellite facilities in the name of one licensed organization that meet the same requirements as the main facility. Group living facilities include transitional housing such as drug rehabilitation centers or halfway houses, short-or long-term – care facilities, group homes for the physically or mentally Challenged and other nonprofit group living facilities.

**Homeless shelters, hospices and women’s shelters** must provide lodging as the primary Function, must be open for operation with at least six beds for a minimum of 180 days and/or nights per year and may also have satellite facilities in the name of one licensed organization that meet the same requirements as the main facility.

Separate applications must be filed for each type of facility (a homeless shelter, a women’s shelter, a hospice or group living facility), even if they are under one licensed organization.

5. **Low-Income Ratepayer Assistance Program for Multi-Family Units:** Per Ordering Paragraph 5 of D.20-08-047, California American Water will offer discounts on water usage for low-income multifamily buildings under a pilot program as defined in the Preliminary Statement authorizing such program. The pilot program will consist of four program components:

(N)

a. **Multi-Family Housing in Disadvantaged Communities:** This Program component would be applicable only to master metered buildings in a disadvantaged or severely disadvantaged community (“DAC/SDAC”) in the San Diego Service Area.

1. Eligible master metered account holders would receive the Low-Income Ratepayer Assistance Discount in the applicable service area which includes a meter-based discount and a discount on volumetric charges, based on the percentage of eligible residents as compared to the total residents.
2. This program will require building partnerships with local community-based organizations in our San Diego Service Area.

(N)

(Continued)

(TO BE INSERTED BY UTILITY)

ISSUED BY

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

Advice 1320

J. T. LINAM

Date Filed \_\_\_\_\_

Decision

DIRECTOR - Rates & Regulatory

Effective \_\_\_\_\_

Resolution \_\_\_\_\_

Schedule No. CA-LIRA  
California American Water

LOW INCOME RATEPAYER ASSISTANCE PROGRAM

**SPECIAL CONDITIONS APPLICABLE TO LOW-INCOME RATEPAYER ASSISTANCE PROGRAM**

(N)

**(Continued):**

**General Items**

4. **Low-Income Ratepayer Assistance Program for Multifamily Units:** (Continued)

- b. **Multifamily Low-Income Housing Tax Credit:** This program component would provide a discount directly to the owner/operators of non-profit and for-profit affordable housing properties tax credit recipients. California American Water has identified properties in Sacramento and Monterey Service Areas eligible for this credit.
  - 1. Eligible master metered account holders would receive the Low-Income Ratepayer Assistance discount of 20% in Sacramento and 30% in Monterey which includes a discount on meter-based and volumetric charges.
  - 2. Eligibility is defined as rental housing developments that are subject to a regulatory agreement with the California Tax Credit Allocation committee. And to be eligible for this benefit the housing provider must have a minimum of five years remaining on affordable housing deed restrictions for the housing provider of the property.
  - 3. This program will require building partnerships with local community-based organizations in the Sacramento and Monterey Service Areas.
- c. **Meter Retrofit for Fruitridge Vista Multifamily Units:** This program component would identify suitable duplex and four-unit multifamily buildings and install individual meters, instead of master meters as currently projected and authorized to be installed.
- d. **Low-Income Joint Water and Energy Install Program:** This program component would expand existing water energy retrofit programs that are currently conducted jointly with energy providers to currently un-served multifamily buildings and mobile home parks. The program that currently extends hot and cold-water measures including appliances, fixtures, and weatherization to low-income housing is funded jointly by California American Water and the energy utility.

(N)

**Fees and Surcharges**

- 1. Please reference each district's Tariff Schedule 1 for a list of applicable fees and surcharges. Low-Income Ratepayer Assistance Program customers are exempt from the Low-Income Ratepayer Assistance Balancing Account surcharge.

(L)

(L)

(Continued)

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Advice	1320	J. T. LINAM	Date Filed	_____
Decision		DIRECTOR - Rates & Regulatory	Effective	_____
			Resolution	_____

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**ADVICE LETTER 1320**

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**ADVICE LETTER 1320**

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