

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 29, 2021

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. 1327, filed on March 31, 2021, regarding 2020 WRAM & MCBA for the Central Satellite district.

Enclosed are copies of the following revised tariff sheets, effective March 31, 2021, for the utility's files:

<b>P.U.C.</b>	<b>Sheet No.</b>	<b>Title of Sheet</b>
	10011-W	Schedule No. CEN-SAT, Central Satellite Tariff Area GENERAL METERED SERVICE, Sheet 4
	10012-W	Schedule No. CEN-SAT, Central Satellite Tariff Area GENERAL METERED SERVICE, Sheet 6
	10013-W	TABLE OF CONTENTS, Sheet 3
	10014-W	TABLE OF CONTENTS, Sheet 1

Please contact Bradley Leong at [BL4@cpuc.ca.gov](mailto:BL4@cpuc.ca.gov) or 415-703-2307, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant  
Water Division

Enclosures

**CALIFORNIA PUBLIC UTILITIES COMMISSION  
DIVISION OF WATER AND AUDITS**

**Advice Letter Cover Sheet**

**Utility Name:** California American Water  
**District:** Central Satellite  
**CPUC Utility #:** U210W  
**Advice Letter #:** 1327  
**Tier:**  1    2    3    Compliance  
**Authorization:** D.08-11-023, D.12-04-048,  
D.13-07-041, D.18-12-021  
**Description:** 2020 Central Satellite WRAM & MCBA

**Date Mailed to Service List:** March 31, 2021  
**Protest Deadline (20<sup>th</sup> Day):** April 19, 2021  
**Review Deadline (30<sup>th</sup> Day):** April 29, 2021  
**Requested Effective Date:** March 31, 2021  
**Rate Impact:** \$See AL  
See AL%

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:** Nancy Hollingsworth  
**Phone:** 916-568-4209  
**Email:** Nancy.Hollingsworth@amwater.com

**Utility Contact:** Jonathan Morse  
**Phone:** 916-568-4246  
**Email:** Jonathan.Morse@amwater.com

**DWA Contact:** Tariff Unit  
**Phone:** (415) 703-1133  
**Email:** [Water.Division@cpuc.ca.gov](mailto:Water.Division@cpuc.ca.gov)

**DWA USE ONLY**

DATE

STAFF

COMMENTS

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

APPROVED

WITHDRAWN

REJECTED

**Signature:** \_\_\_\_\_

**Comments:** \_\_\_\_\_

**Date:** \_\_\_\_\_

\_\_\_\_\_

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
10011-W	Schedule No. CEN-SAT Central Satellite Tariff Area GENERAL METERED SERVICE Sheet 4	9937-W
10012-W	Schedule No. CEN-SAT Central Satellite Tariff Area GENERAL METERED SERVICE Sheet 6	9804-W
10013-W	TABLE OF CONTENTS Sheet 3	10009-W
10014-W	TABLE OF CONTENTS Sheet 1	10010-W



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March 31, 2021

ADVICE LETTER NO. 1327

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:

### **PURPOSE**

The purpose of this advice letter filing is to request recovery of the 2020 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)<sup>1</sup>, 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.*

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

*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 30<sup>th</sup> 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. California American Water 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;*
- 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 31<sup>st</sup> to the previous November 30<sup>th</sup>, and to include nine months of recorded data through September 30<sup>th</sup> 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 California American Water'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.*

California American Water submitted its annual report with DWA on 11/30/2020. The report contained recorded balances January 1 through October 31, 2020 and forecasted balances for the period November 1 through December 31, 2020.

**REQUEST**

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

TABLE 1: Recovery of WRAM/MCBA Balances				
DESCRIPTION	Authorized WRAM/MCBA Over/(Under) Collection	Cumulative Interest Earned/ Accrued	Cumulative Surcharge Collections	Balance
<b>Central Satellites</b>				
Authorized Prior Balance Remaining at 12/31/2020	(\$465,337)	(\$2,474)	\$185,492	(\$282,319)
Recorded Balance not yet Approved for YR 2020	(\$263,323)	(\$270)	\$0	(\$263,593)
UAW Penalty/(Reward)				13,160
Balance				(\$532,752)
2020 Revenue Requirement				\$1,618,669
2020 Balance % of Revenue				32.9%

Based on the above balance and 15% cap outlined in D.18-12-021, California American Water requests a volumetric surcharge of \$0.1906 over a 26-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 Ampler Park are separate from the current Central Satellite WRAM. California American Water requests to continue the volumetric surcharges of \$0.1894 for Amber and \$0.1982 for Toro.

TABLE 2: Recovery of WRAM/MCBA Balances				
DESCRIPTION	Authorized WRAM/MCBA Over/(Under) Collection	Cumulative Interest Earned/ Accrued	Cumulative Surcharge Collections	Balance
<b>Ambler</b>				
Authorized Prior Balance Remaining at 12/31/2020	(\$781,574)	(\$4,328)	\$91,550	(\$694,352)
Recorded Balance not yet Approved for YR 2020				\$0
UAW Penalty/(Reward)				
Balance				(\$694,352)

TABLE 3: Recovery of WRAM/MCBA Balances				
DESCRIPTION	Authorized WRAM/MCBA Over/(Under) Collection	Cumulative Interest Earned/ Accrued	Cumulative Surcharge Collections	Balance
<b>Toro</b>				
Authorized Prior Balance Remaining at 12/31/2020	(\$413,326)	(\$2,253)	\$93,581	(\$321,998)
Recorded Balance not yet Approved for YR 2020				\$0
UAW Penalty/(Reward)				
Balance				(\$321,998)

### **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**

California American Water submits this as a Tier 1 advice letter per D.13-07-041 and requests an effective date of March 31, 2021.

### **NOTICE**

Pursuant to Section 4.3 of General Order No. 96-B, a copy of this advice letter is being provided to those entities listed in the attached "SERVICE LIST PURSUANT TO SECTION 4.3 OF G.O. NO. 96-B." Per guidance from the California Public Utilities Commission's Water Division, during the COVID-19 pandemic advice letters will only be delivered electronically to

the service list. Hardcopy advice letters will be mailed as soon as administrative staff are able to return to California American Water offices.

### **RESPONSE OR PROTEST**<sup>2</sup>

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 grounds<sup>3</sup> 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](mailto: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:**

[Nancy.Hollingsworth@amwater.com](mailto:Nancy.Hollingsworth@amwater.com)

**Mailing Address:**

4701 Beloit Drive  
Sacramento, CA 95838

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<sup>2</sup> G.O. 96-B, General Rule 7.4.1

<sup>3</sup> G.O. 96-B, General Rule 7.4.2



[sarah.leeper@amwater.com](mailto:sarah.leeper@amwater.com)

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

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.

**REPLIES**<sup>4</sup>

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*

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Jeffrey T. Linam  
Vice President of Rates & Regulatory

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<sup>4</sup> G.O. 96-B, General Rule 7.4.3

Schedule No. CEN-SAT  
Central Satellite Tariff Area  
GENERAL METERED SERVICE

Sheet 4

**SPECIAL CONDITIONS**

**Fees and Surcharges (Continued):**

**ALL CENTRAL SATELLITE TARIFF AREA (Continued)**

5. Per Advice Letter 1322, the under-collected balance in the Central Satellite Consolidated Expense Balancing Account will be recovered through a quantity-based surcharge of \$0.0527 per 100 gallons over 36 months effective March 18, 2021. This total amount will be recovered from all classes of customers except for Chualar customers.
6. Per Advice Letter 1327, a surcharge/surcredit is included in each bill to recover the net under/over-collection in the Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA). For the period ending December 31, 2020, the net under-collection totals \$545,912 including interest. The surcharge of \$0.1906 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. The Chualar service area is excluded from this surcharge. (C)  
(C)  
(C)
7. 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 15% of the authorized revenue requirement. The Chualar service area is excluded from this surcharge.
8. Per D.18-12-021 a meter based bill credit for the 2018 Excess Non-Plant Accumulated Deferred Income Tax will be refunded to customers over the 24-month period beginning October 17, 2019.

Meter Size	Refunds by Meter Equivalents
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

(Continued)

(TO BE INSERTED BY UTILITY)

Advice 1327  
Decision

ISSUED BY

J. T. LINAM  
DIRECTOR - Rates & Regulatory

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

Date Filed 03/31/2021  
Effective 03/31/2021  
Resolution \_\_\_\_\_

Schedule No. CEN-SAT  
Central Satellite Tariff Area  
GENERAL METERED SERVICE

**SPECIAL CONDITONS (continued):**  
**Fees and Surcharges**

**AMBLER PARK SERVICE AREA ONLY**

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

- 1. A surcharge/surcredit is included in each bill to recover the net under/over-collection in the Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA). For the period ending December 31, 2020, the net under-collection totals \$694,352 including interest. The surcharge of \$0.1894 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/surcredit is included in each bill to recover the net under/over-collection in the Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Account (MCBA). For the period ending December 31, 2020, the net under-collection totals \$321,998 including interest. The surcharge of \$0.1982 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)	ISSUED BY	(TO BE INSERTED BY C.P.U.C.)
Advice 1327	J. T. LINAM	Date Filed <u>03/31/2021</u>
Decision	DIRECTOR - Rates & Regulatory	Effective <u>03/31/2021</u>
		Resolution _____



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(Continued)

<u>(TO BE INSERTED BY UTILITY)</u>	<u>ISSUED BY</u>	<u>(TO BE INSERTED BY C.P.U.C.)</u>
Advice      1327	J. T. LINAM	Date Filed <u>03/31/2021</u>
Decision	DIRECTOR - Rates & Regulatory	Effective <u>03/31/2021</u>
		Resolution    _____

**MONTEREY COUNTY DISTRICT SERVICE LIST**  
**CALIFORNIA-AMERICAN WATER COMPANY**  
**ADVICE LETTER 1327**

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**BY MAIL:**

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**MONTEREY COUNTY DISTRICT SERVICE LIST**  
**CALIFORNIA-AMERICAN WATER COMPANY**  
**ADVICE LETTER 1327**

**By E-MAIL:**

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Monterey, CA 93940  
Attn: City Clerk  
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