



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Investigation to Consider Policies to Achieve the Commission's Conservation Objectives for Class A Water Utilities.	Investigation 07-01-022 (Filed January 11, 2007)
In the Matter of the Application of Golden State Water Company (U 133 W) for Authority to Implement Changes in Ratesetting Mechanisms and Reallocation of Rates.	Application 06-09-006 (Filed September 6, 2006)
Application of California Water Service Company (U 60 W), a California Corporation, requesting an order from the California Public Utilities Commission Authorizing Applicant to Establish a Water Revenue Balancing Account, a Conservation Memorandum Account, and Implement Increasing Block Rates.	Application 06-10-026 (Filed October 23, 2006)
Application of Park Water Company (U 314 W) for Authority to Implement a Water Revenue Adjustment Mechanism, Increasing Block Rate Design and a Conservation Memorandum Account.	Application 06-11-009 (Filed November 20, 2006)
Application of Suburban Water Systems (U 339 W) for Authorization to Implement a Low Income Assistance Program, an Increasing Block Rate Design, and a Water Revenue Adjustment Mechanism.	Application 06-11-010 (Filed November 22, 2006)
Application of San Jose Water Company (U 168 W) for an Order Approving its Proposal to Implement the Objectives of the Water Action Plan.	Application 07-03-019 (Filed March 19, 2007)

**COMMENTS OF CALIFORNIA WATER ASSOCIATION
ON THE PROPOSED DECISION OF ALJ GRAU AUTHORIZING
MEMORANDUM ACCOUNTS TO TRACK LEGAL AND REGULATORY EXPENSES
INCURRED IN THIS PROCEEDING**

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure,
California Water Association ("CWA") files its comments on the Proposed Decision of ALJ

Grau (“Proposed Decision” or “PD”), mailed on January 26, 2010, on the application for rehearing of the Division of Ratepayer Advocates (“DRA”) of D.08-02-036 in Phase 1A of this proceeding. DRA sought rehearing of D.08-02-036’s authorization for Class A water utilities to establish memorandum accounts to track legal and related expenses incurred by the water utilities in this proceeding from the date of the issuance of the Order Instituting Investigation.

CWA supports the Proposed Decision and urges the Commission to adopt it.

Joining CWA in these reply comments are the following CWA Class A water utilities members: California Water Service Company, California American Water Company, Golden State Water Company, San Jose Water Company, San Gabriel Valley Water Company, Suburban Water Systems and Valencia Water Company.

I. INTRODUCTION

Decision No. 08-02-036 (the “Decision”) provided that a “memorandum account is authorized for Suburban [Water Systems] and other Class A water utilities to track legal and related expenses incurred in participating in this proceeding from the date of issuance of this order instituting investigation ...” Decision, Ordering Paragraph 5, *mimeo*, at 56. In response to DRA’s application for rehearing, Decision No. 09-06-053 (the “Rehearing Decision”) granted limited rehearing of the Decision “solely on the issue of extending memorandum account treatment to all Class A water utilities.” Rehearing Decision, Ordering Paragraph 1, *mimeo*, at 26. Parties submitted opening comments on the issue of memorandum account treatment for all Class A water utilities on July 27, 2009 and reply comments on August 17, 2009.

II. DISCUSSION

The Proposed Decision addresses the two main issues necessary to resolve DRA’s application for rehearing: (1) whether the Decision’s authorization to establish memorandum

accounts is consistent with Commission policy on the establishment of memorandum accounts, and (2) whether the absence of specific requests by the water utilities (except for Suburban Water Systems' specific request) for authority to establish memorandum accounts to track legal and related expenses incurred in this proceeding is a bar to authorizing such memorandum accounts. The Proposed Decision correctly concludes that the Decision's authorization of memorandum accounts is consistent with the Commission's policy on the establishment of memorandum accounts, and that the Commission may authorize the establishment of memorandum accounts absent specific requests therefore.

The Proposed Decision correctly cites Commission Standard Practice U-27-W, "Standard Practices for Processing Rate Offsets and Establishing and Amortizing Memorandum Accounts," revised May 2008, and its five-pronged test for the establishment of memorandum accounts. That five-pronged test authorizes memorandum accounts to track reasonable costs that have been prudently incurred by utilities, that the Commission has directed to be tracked due to events of an exceptional nature and that: (1) are not under the utility's control; (2) could not have been reasonably foreseen in the utility's last general rate case; (3) that will occur before the utility's next scheduled rate case; (4) are of a substantial nature in that the amount of money involved is worth the effort of processing a memo account; and (5) have ratepayer benefits.

The Proposed Decision correctly concludes that the Class A water utilities' participation in this water conservation OII satisfies each criterion of the five-pronged test established by Commission Standard Practice U-27-W.

Similarly, the Proposed Decision, after a thorough discussion, correctly concludes that "there are many instances where the Commission has authorized memorandum accounts without a specific request," and that such instances "illustrate the Commission's ability to authorize

memorandum accounts where necessary, independent of the number of requests for them and the specific expenses to be tracked.” PD, at 14.

III. CONCLUSION

CWA believes the Proposed Decision correctly analyzes the relevant Commission policies and precedents regarding the establishment of memorandum accounts. Thus, CWA urges the Commission to adopt the Proposed Decision as its final decision on DRA’s application for rehearing of D.08-02-036

DATED: February 16, 2010

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Jeannie Wong, hereby certify that on this date I will serve by electronic mail and hand delivery, the foregoing **COMMENTS OF CALIFORNIA WATER ASSOCIATION ON THE PROPOSED DECISION OF ALJ GRAU AUTHORIZING MEMORANDUM ACCOUNTS TO TRACK LEGAL AND REGULATORY EXPENSES INCURRED IN THIS**

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Executed this 16th day of February 2010, in San Francisco, California.

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