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

Application of California-American Water  
Company (U210W) for Approval of the  
Monterey Peninsula Water Supply Project and  
Authorization to Recover All Present and Future  
Costs in Rates

Application No. 12-04-019  
(Filed April 23, 2012)

**REVISED COMMON BRIEFING OUTLINE**

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California-American Water Company

June 5, 2015

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**REVISED COMMON BRIEFING OUTLINE**

Pursuant to the assigned Administrative Law Judge’s rulings,<sup>1</sup> California-American Water Company (“California American Water”) submits a common outline to be used by the parties in the legal and policy opening and reply briefs due on July 14, 2015 and July 29, 2015, respectively.<sup>2</sup> California American Water submits this common briefing outline after working with the parties to the proceeding to develop a mutually-agreeable outline, attached hereto as Attachment 1. The outline previously filed on May 26, 2015 should be replaced with this version.

This outline has been created in consultation with all other parties and has been re-drafted to include all parties’ issues of concern. No party has objected to this outline.

Dated: June 5, 2015

Respectfully submitted,

By: /s/Sarah E. Leeper  
Sarah E. Leeper

Attorney for Applicant  
California-American Water Company

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<sup>1</sup> See *Ruling Setting forth Updated Schedule and Addressing Other Matters*, January 27, 2014, p. 2; *Administrative Law Judge’s Ruling Updating Schedule*, August 21, 2014, p. 3. The most recent ruling on the common briefing outline established a deadline for June 5, 2015 to file and serve the common outline. See *E-mail on Common Outline for Briefing*, June 2, 2015, p. 3.

<sup>2</sup> *Administrative Law Judge’s Ruling Updating Schedule*, January 23, 2015, p. 3 (setting deadline for the opening brief as 75 days after the issuance of the Draft Environmental Impact Report, and the reply brief 15 days later)

# **ATTACHMENT 1**

## **COMMON OUTLINE FOR BRIEFING ON LEGAL & POLICY ISSUES**

- I. INTRODUCTION
- II. PRESENT AND FUTURE PUBLIC CONVENIENCE AND NECESSITY OF PROJECT
  - A. Projection of Demand and Plant Size and Operations
  - B. Environmental Impacts of the MPWSP & Required Mitigation Measures and Conditions
    - 1. Brine Discharge
    - 2. Coastal Erosion
    - 3. Other Environmental Impacts and Mitigations Including Groundwater, Terrestrial, Marine, and Cumulative
    - 4. Seawater Intake System
  - C. Groundwater Predictive Models
  - D. Cost and Financing Issues
    - 1. Cost Caps
    - 2. Financing Issues
    - 3. Ownership (public or private) and Costs
    - 4. Other Cost Issues
  - E. Benefits and Overriding Policy Considerations as Compared to Significant and Unavoidable Impacts of the Project
  - F. Legal Principles in Support of and in Opposition to MPWSP
    - 1. Site Restrictions and Source Water Issues Relating to the Salinas River Groundwater Basin, including Hydrogeologic Work and Water Rights
    - 2. Other Legal Principles
  - G. Consideration of Alternative Projects
  - H. Jurisdictional Issues Related to the Governance Committee
  - I. Other CPCN Factors
- II. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ISSUES
- III. CONCLUSION