

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



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Application of California-American Water
Company (U-210W) for Authorization to Modify
Conservation and Rationing Rules, Rate Design,
and Other Related Issues for the Monterey
District

A1507019

**APPLICATION OF CALIFORNIA-AMERICAN WATER COMPANY (U-210W) FOR
AUTHORIZATION TO MODIFY THE CONSERVATION AND RATIONING PLAN,
RATE DESIGN, AND OTHER RELATED ISSUES FOR THE MONTEREY DISTRICT**

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Date: July 8, 2015

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RATE DESIGN, AND OTHER RELATED ISSUES FOR THE MONTEREY DISTRICT**

In accordance with Article 2 of the Rules of Practice and Procedure of the California Public Utilities Commission (“CPUC” or “Commission”), California-American Water Company (“California American Water,” or “Company”) respectfully submits this Application to modify its conservation and rationing plan, propose changes to the Monterey Main System rate design, and request other related relief for the Monterey District.¹

The requested modifications to the conservation and rationing plan are necessary to make sure the Monterey District can comply with the current and future modified conditions of the State Water Resource Control Board (“SWRCB”) Cease and Desist Order (“CDO”). In addition to addressing the problems with the current conservation and rationing plan, California American Water files this Application to address the significant problems with the rate design and propose other related mechanisms, including an annual consumption true-up mechanism and adjustments to the Water Revenue Adjustment Mechanism (“WRAM”) and Modified Cost Balancing Account (“MCBA”). The proposed changes in this Application are necessary to ensure that the that the securitization authorized by the State Legislature in Senate Bill 936² and State Revolving Funds (“SRF”) can be obtained and used to finance the replacement supply solution proposed in Application (“A.”) 12-04-019, the Monterey Peninsula Water Supply Project (“MPWSP”)³ in an

¹ All the proposed changes in this Application will be applicable to what is known as the Monterey Main system and including those systems that can produce or receive water from the Seaside Basin and/or Carmel River (including Ryan Ranch, Bishop and Hidden Hills). The Application is not applicable to the sub-systems of Toro, Ambler, Chualar, Ralph Lane or Garrapata.

² Senate Bill No. 936, signed by Governor Brown on September 19, 2014.

³ See Application 12-04-019, *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*, filed April 23, 2012.

equitable manner and at the lowest cost. These changes are also necessary to ensure that all past and future authorized revenue requirements are recovered in a manner that does not cause rate impact pancaking, especially with the overlay of the MPWSP and other projected expenses over the next five years.

I. BACKGROUND AND URGENCY OF REQUEST

Pursuant to the Commission directive in decision (“D.”) 09-07-023, California American Water seeks Commission authorization to change Monterey District Rule 14.1.1, which constitutes California American Water’s conservation and rationing plan. In that decision, the Commission directed California American Water to seek changes if the Monterey Peninsula Water Management District’s (“MPWMD”) Regulation XV does not operate effectively or the Company determines that further measures are needed.⁴

Monterey District Rule 14.1.1 was most recently addressed by the Commission in A.12-07-010 to provide California American Water with “new tools to better manage its water supply and to move quickly to reduce water production in response to a drought or any Cease and Desist Order from the SWRCB or the Seaside Watermaster.”⁵ Due to the complex water supply situation in Monterey, however, these tools are no longer adequate. Accordingly, in coordination with MPWMD, California American Water seeks to revise its Rule 14.1.1 to incorporate revisions to MPWMD’s Regulation XV, the Water Conservation and Rationing Plan, and ensure that California American Water has the tools available to take action in the unlikely event MPWMD does not act.

⁴ D.09-07-023, *Final Decision Adopting Settlement Agreement on Water Conservation and Rationing Issues for the Monterey District*, issued July 13, 2009, p. 16, Conclusion of Law 4 (“Cal-Am is responsible for meeting its obligation to provide adequate water to its customers. If MPWMD’s Regulation XV does not operate effectively, or if Cal-Am determines that further measures are needed, Cal-Am should request Commission authorization to change Monterey District Rule 14.1.1.”). A.07-12-010, *Application of California-American Water Company for Special Conservation Program and Rate Design Modifications in the Monterey District*, filed on December 14, 2007. California American Water filed Application 07-12-010 to request authorization for a special conservation program and modifications to its rate design in the Monterey District in order to reduce water production, create new emergency rates to be implemented for rationing, and provide adequate incentives to large water users to conserve. The Commission issued several decisions in the proceeding. D.09-02-006 authorized revisions to conservation stages 1-3 of California American Water’s Rule 14.1.1. D.09-07-023 adopted a new rationing plan with four additional stages along with modifications to conservation plan stages 1-3 to make it consistent with MPWMD’s Regulation XV.

⁵ D.09-07-023, p. 2.

The legal and regulatory restrictions on California American Water's water supply stem from the SWRCB Order WR 95-10,⁶ a superior court decision in the Seaside Ground Water Basin adjudication in 2006,⁷ and finally the SWRCB CDO in 2009.⁸ The CDO currently requires California American Water to reduce diversions from the Carmel River by prescribed amounts annually and end unauthorized diversions from the river completely by December 31, 2016,⁹ the "physical cliff". The December 2016 deadline to meet the restrictions of the CDO is rapidly approaching, but California American Water's efforts to establish the replacement water supply have been severely delayed, such that the MPWSP will not be online until sometime in 2018 or 2019.

With the "physical cliff" looming and the effects it could have on economic stability on the Monterey Peninsula, California American Water, along with community stakeholders, have proposed modifications to the existing CDO. These modifications would extend the previous deadline to December 21, 2020 but require the company to meet specific milestones related to the progress of the MPWSP or face significant rampdowns in water production. Although it does not intend to miss any of the milestones, California American Water must, nevertheless, be prepared now to deal with the consequences of a significantly reduced water supply and ensure its customers can make do with more limited resources by modifying the current conservation and rationing rules and rate design for the Monterey District. Fixing the conservation and rationing plan would support the SWRCB decision to modify the CDO as it would ensure the company's ability to comply with existing and future reductions.

At the same time, California American Water must create a plan that encourages continued conservation efforts while supporting the financial stability of the Monterey District and the Company's ability to finance the MPWSP in a timely and economical manner. As part of that plan, California American Water must modify the current rate design for the Monterey District in order to ensure that the securitization approved by the State Legislature and signed by Governor Edmund G. Brown can be obtained and funded to finance the MPWSP at the lowest

⁶ SWRCB Order WR 95-10, issued on July 6, 1995.

⁷ See *California American Water v. City of Seaside, et. al.*, March 27, 2006, Monterey Superior Court, Case No. M66343.

⁸ Order WR 2009-0060, October 20, 2009.

⁹ The current CDO requires California American Water to cut its total diversions from the Carmel River by approximately 66%.

cost. Additionally, California American Water must modify the WRAM/MCBA in order to address the fact that customers in the Monterey District will be impacted by the large, historical undercollected balance in the accounts as well as the need to pre-fund a \$71.5 million surcharge for construction of the MPWSP.¹⁰ Delaying recovery of existing authorized revenue creates significant harm for customers and potentially jeopardizes the financing plan for the MPWSP, which is designed to lower costs for customers. The modifications to the WRAM/MCBA will be critical for ensuring that all past and future authorized revenue requirements are recovered in a manner that does not cause rate shock or result in harm to the cost effective financing of the MPWSP. Included as Appendix B to this Application is a table summarizing the rate impacts of the proposed modifications with a comparison of the current and proposed rate design for different customer classes.

The provision of water on the Monterey Peninsula is complex. California American Water must craft a comprehensive solution in order to address current conditions, such as the water supply, as well as future complexities. Otherwise it risks negatively impacting the financial stability of the Monterey District and burdening customers with rate shock.

II. PROBLEMS WITH CURRENT RULE 14.1.1, RATE DESIGN, AND WRAM/MCBA ADDRESSED BY THIS APPLICATION

This Application addresses the significant problems with the current Rule 14.1.1, rate design and WRAM/MCBA recovery for the Monterey District. The current conservation and rationing rules are far too regimented and difficult to understand, which makes implementation nearly impossible. The rules are inefficient and require California American Water to move systematically through all the stages, some of which will have no effect on ensuring consumption reduction, before moving to succeeding stages. The rules rely heavily on tiered rates and rationing in early stages of the plan. Physical rationing, which currently comprises the main enforcement stages, is very costly to implement. As they are now, the rules simply may not be

¹⁰ Settling Parties' Motion to Approve Settlement [Settlement Agreement Attached], Attachment A, Settlement Agreement of California-American Water Company, Citizens for Public Water, City of Pacific Grove, Coalition of Peninsula Businesses, County of Monterey, Division of Ratepayer Advocates, Landwatch Monterey County, Monterey County Farm Bureau, Monterey County Water Resources Agency, Monterey Peninsula Regional Water Authority, Monterey Peninsula Water Management District, Monterey Regional Water Pollution Control Agency, Planning and Conservation League Foundation, Salinas Valley Water Coalition, Sierra Club, and Surfrider Foundation, filed July 31, 2013 ("Settlement Agreement"), p. 23.

implementable in their current form due to rate design issues. Changes to the Rule 14.1.1 must occur immediately as there are concerns that later stages of the plan may need to be implemented next year, especially given the drought prone nature of the Monterey District and the possible need to comply with a modified CDO.¹¹

Similarly, the current residential rate design in the Monterey District is plagued with significant problems that California American Water seeks to address in this Application. The rate design is far too complex, which makes bills difficult to understand and causes customer concern and outcry. This complexity also creates challenges with billing and customer service that exacerbate customer concerns. The current rate design provides water for outdoor use at far too low rates given the Monterey situation and allows multi-residential complexes far too much water in each tier. The design, with its individual allotment based system, is not equitable, and there is limited ability to ensure the water allotments are accurate.

Finally, the current rate design has made it impossible to recover the revenue requirement in a timely manner, and places too much of the revenue recovery in highly variable quantity rates. This, along with the exclusion of Tier 1 usage from the amortization of the net WRAM/MCBA balance for residential customers in Monterey, where nearly 60% of the usage occurs, has led to a situation where the WRAM/MCBA balance cannot be fully recovered and continues to grow. As of December 31, 2014, the cumulative net under-collected balance for the Monterey District was approximately \$40 million. If no action is taken to modify the rate design to reduce the current rate of under-collection and address the large balance, the current system will continue to impose additional costs on future generations of customers, further degrade the Company's cash flow, and will impact the ability of California American Water to finance the MPWSP. Furthermore, the changes in this Application are necessary to permit California American Water to obtain financing for the replacement water supply project at the most economical levels possible to the benefit of its ratepayers.

¹¹ Given that California American Water will not be able to meet the CDO requirements by the end of 2016, California American Water with the support of various stakeholders is in the process of negotiating a modification to the CDO.

III. SUMMARY OF REQUEST

This Application presents a set of solutions that, together, create a comprehensive approach to meeting the water production limitations of the Monterey District, while simultaneously ensuring the Company's ability to finance the MPWSP in a timely and economical fashion. Specifically, California American Water requests the Commission to:

Requests

- Modify the Monterey District Rule 14.1.1 to adjust the conservation and rationing rules to have fewer stages, be easier to implement in a timely manner, allow for rationing levels to be determined and noticed at the time of need, eliminate water banking, and limit the Plan to one stage of physical water rationing.
- Issue a decision by May 1, 2016 to eliminate all outdoor watering allotments from the rate design, consistent with the Governor's Executive Order B-29-15, SWRCB Resolution 2015-0032, and Commission Resolutions.¹²
- Modify Monterey Main System residential rates to eliminate the residential surveys to set allotments, eliminate the individual allotment based rate design, allow greater recovery of fixed costs in the service charge, reduce the amount of subsidy on water consumed in Tier 1, reduce the ratio of the rate difference between the first and upper tiers, and use authorized 2014 annual residential consumption and 2014 usage by tier as the basis for the rate design.
- Revise the Low Income Credit Program to mitigate the rate impact on these customers due to the elimination of allotments.
- Revise the Monterey authorized rate case level of consumption to adopt the 2014 actual consumption by tier for all Monterey Main System customers.
- Establish a single 20-year, fixed meter size ratio surcharge on customer water bills to address recovery of the remaining historical WRAM/MCBA balance as of the date of the final decision.

¹² See Commission Resolution W-5000, August 14, 2014; *see also* Commission Resolution W-5034, April 9, 2015; *see also* Commission Resolution W-5041, May 7, 2015.

- Authorize California American Water to apply all future WRAM surcharges on a uniform basis to all units of water sold, including residential tier 1 usage. This modification would ensure that the conservation and water use restriction message is uniformly conveyed on all Monterey residential customers' bills by applying the surcharge to all units of water in a single surcharge, exactly as is handled in all other California American Water districts.
- Initiate an annual residential consumption true-up pilot program.
- Schedule Commission-sponsored public workshop(s) to address the requests in this Application.

IV. AUTHORITY FOR REQUEST

This Application is made pursuant to the Commission's Rules of Practice and Procedure and the California Public Utilities Code ("P.U. Code"). The Company's authority for this request is Sections 451, 454, 491, 701, 728, 729, and 8201 of the P. U. Code. In addition, this Application complies with Article 2 of the Commission's Rules of Practice and Procedure.

California American Water also files this Application pursuant to D.09-07-023. In that decision, the Commission made it clear that the Company has a responsibility under P.U. Code §§451 and 8201 to adequately plan for and adequately serve its customers with water.¹³ With respect to the conservation and rationing plan, the Commission stated that the outcome of D.09-07-023 did not lessen California American Water's utility obligations in any way.¹⁴ The Commission further stated that, while MPWMD "has the authority to restrict water use in the [Monterey Peninsula Water Resource System] MPWRS during an emergency, Cal-Am cannot rely on the actions of any other entity to meet its utility obligations to serve its customers."¹⁵ The Commission specifically highlighted the Company's ability to strengthen its rationing programs as a way of meeting its obligations.¹⁶ After making it clear that California American Water is responsible for meeting its obligation to provide adequate water to its customers, the Commission concluded:

¹³ D.09-07-023, p. 12.

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.* at 13.

If MPWMD's Regulation XV does not operate effectively, or if Cal-Am determines that further measures are needed, Cal-Am should request Commission authorization to change Monterey District Rule 14.1.1 or take other action as needed.¹⁷

California American Water has determined that its current Rule 14.1.1, the Company's implementation of MPWMD's Regulation XV, does not operate effectively and that further measures are needed to ensure the Company can meet its obligations to provide adequate water to its customers in the face of looming legal and regulatory restrictions on the Monterey District's water supply. California American Water, therefore, respectfully requests that the Commission authorize the modifications listed above and described in its testimony.

California American Water did not include these requests in its most recent General Rate Case ("GRC"), A.13-02-007, because including these requests in that GRC would have required knowledge of facts in early 2013 that could not have been known and understood at that time. California American Water cannot wait until its next GRC, scheduled to be filed on July 1, 2016, because of the urgent need to address the requests in this Application now.

V. REQUIRED INFORMATION

A. Required Information

California American Water's exact legal name is California-American Water Company. Its corporate office and post office address is 1033 B Avenue, Suite 200, Coronado, California 92118. California American Water is a California corporation organized under the laws of the State of California on December 7, 1965. California American Water is a Class A regulated water utility organized and operating under the laws of the State of California. California American Water provides water and wastewater service in various areas in the following California counties: Los Angeles, Monterey, Placer, Sacramento, San Diego, Sonoma, and Ventura. Included as Appendix C to this Application is a chart summarizing the corporate structure of California American Water, and its relationship with its parent company, American Water, and American Water subsidiaries.

A certified copy of California American Water's articles of incorporation was filed with the Commission on January 6, 1966 in connection with Application 48170. A certified copy of

¹⁷ *Id.* at 13; see also Conclusion of Law 4.

an amendment to California American Water's articles of incorporation was filed with the Commission on November 30, 1989 in connection with Application 89-11-036. A certified copy of an amendment to California American Water's articles of incorporation dated October 3, 2001 and filed with the office of the California Secretary of State on October 4, 2001, was filed with the Commission on February 28, 2002, in connection with Application 02-02-030. The articles of incorporation have not been subsequently amended.

None of the persons described in Section 2 of General Order No. 104-A has a material financial interest in any transaction involving the purchase of materials or equipment or the contracting, arranging, or paying for construction, maintenance work, or service of any kind to which the Company has been a party during the period subsequent to the filing of California American Water's last Annual Report with this Commission or to which California American Water proposed to become a party at the conclusion of the year covered by said Annual Report.

B. Application Correspondence

Correspondence and communications concerning this Application should be addressed to the following persons:

Sarah E. Leeper
Nina Suetake
California-American Water Company
333 Hayes Street, Suite 202
San Francisco, CA 94102
(415) 863-2470
sarah.leeper@amwater.com
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Copies of such correspondence and communications should be sent to:

Sherrene Chew
California-American Water Company
4701 Beloit Drive
Sacramento, CA 95838
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sherrene.chew@amwater.com

C. Categorization

Rule 2.1(c) of the Commission's Rules of Practice and Procedure defines ratesetting proceedings as those in which "the Commission sets or investigates rates for a specifically named utility (or utilities), or establishes a mechanism that in turn sets the rates for a specifically

named utility (or utilities).” The Commission should categorize this proceeding as ratesetting.

D. Evidentiary Hearings and Issues to be Considered

California American Water requests expedited treatment of its proposal to eliminate all outdoor watering allotments. Given the severe drought conditions, in order to ensure an adequate water supply through the summer for essential uses, it is imperative to eliminate outdoor watering as much as possible and provide the appropriate rate signal to customers that outdoor watering is not in the best interests of preserving the current water supply. California American Water is requesting the Commission act expeditiously on this proposal no later than May 1, 2016, and possibly while the remainder of this Application is addressed by the Commission, such that when summer rates begin, customers will no longer have allotments for outdoor irrigation. Given the urgent need to remove outdoor watering allotments, California American Water requests expedited treatment for this issue and does not believe evidentiary hearings are necessary to enact this provision.

Evidentiary hearings will likely be necessary to address the remaining factual disputes on material issues such as the need for and reasonableness of modifications to the existing Rule 14.1.1, the reasonableness of specific rate design proposals, the reasonableness of the proposed modifications to the WRAM/MCBA and the proposal to address recovery of under-collected balances, and the reasonableness of the proposed consumption true-up pilot program.

1. Proposed Schedule

California American Water submits the procedural schedule below for the Commission’s consideration of the relief requested.

Table 1: Proposed Schedule (Without Evidentiary Hearings) for Expedited Rate Design Change to Eliminate Outdoor Watering Allotments

Event	Day	Dates
Application Filed/Testimony Served	0	7/8/2015
Docketing and Formal Public Notice	7	7/15/2015
Comments/Protests on Application	35	8/12/2015
Prehearing Conference on Expedited Issue	50	8/27/2015
ORA Testimony	110	10/26/2015
Rebuttal Testimony	131	11/16/2015

Event	Day	Dates
Opening Brief	148	12/3/2015
Reply Briefs	162	12/17/2015
ALJ's Proposed Decision Mailed	252	3/16/2016
Comments on Proposed Decision	272	4/5/2016
Reply Comments	277	4/10/2016
Commission Agenda	277+	April 2016

Table 2: Proposed Schedule (With Evidentiary Hearings)

Event	Day	Dates
Application Filed/Testimony Served	0	7/8/2015
Docketing and Formal Public Notice	7	7/15/2015
Comments/Protests on Application	35	8/12/2015
Prehearing Conference	61	9/7/2015
Public Workshop(s)	62-90	9/8/2015-10/6/2015
ORA Testimony	210	2/3/2016
Rebuttal Testimony	238	3/2/2016
ADR Processes or Settlement Begins	243-253	3/7/2016-3/17/2016
Evidentiary Hearings	257-260	3/21/2016-3/24/2016
Opening Brief	288	4/21/2016
Reply Briefs	316	5/19/2016
ALJ's Proposed Decision Mailed	406	8/17/2016
Comments on Proposed Decision	426	9/6/2016
Reply Comments	431	9/11/2016
Commission Agenda	431+	September 2016

E. Notice and Service

California American Water will serve a copy of the Application in accordance with Rule 3.2(b) and upon the attached service list. Unless otherwise noted on the service list, recipients will receive a copy of the Application only, exclusive of the supporting testimony due to its size, cost of reproduction, and cost to mail. A Notice of Availability is attached to this Application.

Within twenty days of the filing of the Application, California American Water will cause to be published once, in a newspaper of general circulation in the area served, a notice of the general terms of the proposed increases. California American Water will submit proof of such publication to the Commission. California American Water has provided a draft of the customer notice, included as Appendix D to the Application, to the Public Advisor's Office.

California American Water will send notice of the Application to its customers in accordance with Rule 3.2(d).

VI. SUPPORT FOR APPLICATION

In support of this request, California American Water will introduce the Application, exhibits, work papers, and other data responses, copies of which have been or will be delivered to the Office of Ratepayer Advocates (“ORA”) and Commission staff. California American Water will also provide written and oral direct and rebuttal testimony in support of its requests.

A. Testimony

California American Water will serve direct testimony in support of this Application. The following table is an index of the witnesses and the issues they are covering in their testimony.

Table 2 - Index of Witnesses and Testimony Issues

Name	Title	Subject of Testimony
Sherrene P. Chew	California American Water - Sr. Manager - Rates & Regulatory	<ul style="list-style-type: none"> • Rate design changes to eliminate all outdoor watering allotments • Policy considerations • Rate design policy, principles, and specific recommendation to revise Monterey Main System residential rates to adopt a standard inclining block rate design eliminating all allotments • Revisions to Low Income Credit Program • Revision to the Monterey authorized rate case level of consumption to adopt the 2014 actual consumption by tier for all Monterey Main System customers • Specific impacts of proposed modifications to residential rates and Low Income Credit Program • Request to schedule CPUC sponsored public workshops to address the requests in this Application
Jeffrey T. Linam	California American Water - Director of Finance and Rates	<ul style="list-style-type: none"> • Authorization to develop a new WRAM/MCBA surcharge to recover historical balances over a 20 year period • Authorization to apply all future WRAM surcharges on a uniform basis to all units of water sold, including Tier 1 units • Authorization for an annual consumption true-up pilot program

Name	Title	Subject of Testimony
Eric J. Sabolsice	California American Water - Director of Operations	<ul style="list-style-type: none"> • History of Monterey water supply constraints • History of Monterey conservation and rationing • History of Commission rate design in Monterey • Issues with Monterey District rate design (allotments) • Modifications to Rule 14.1.1
David J. Stoldt	Monterey Peninsula Water Management District - General Manager	<ul style="list-style-type: none"> • Modifications to Rule 14.1.1 • Revision to Monterey Main System residential rates to adopt a standard inclining block rate design eliminating all allotments • Revision to the Monterey authorized rate case level of consumption to adopt the 2014 actual consumption by tier for Monterey Main System • Impact of the rate design on the securitization and the ability to secure funds at the lowest costs to customers in Monterey

B. Appendices

Appended to this Application are the exhibits listed below, which California American Water submits in compliance with Rule 3.2(a) of the Commission’s Rules of Practice and Procedure.

- Appendix A – Consolidated balance sheets and statements of income, and summary of earnings
- Appendix B –Rate impacts for the proposed modifications
- Appendix C – Corporate Structure Chart
- Appendix D – Customer Notice

VII. CONCLUSION AND REQUEST FOR RELIEF

WHEREFORE, California American Water respectfully requests that the Commission issue its findings and orders to the effect that:

- (1) The requests in this Application are granted;
- (2) The rates proposed and requested by California American Water are fair, just and reasonable;
- (3) California American Water be granted the relief requested in Section 2 of this Application and detailed in supporting testimony; and

(4) For such other and further relief as may be necessary and appropriate.

Dated: July 8, 2015

Respectfully submitted,

By: Sarah E. Leeper
Sarah E. Leeper
Attorney for Applicant
California-American Water Company

NOTICE OF AVAILABILITY

The testimony in support of the Application listed below exceeds 50 pages in length. Therefore, pursuant to Rule 1.9(d)(1), California American Water hereby provides this Notice of Availability of the testimony in support of the Application. Upon written request, California American Water will provide a copy of the testimony in support of the Application on parties on whom this Notice of Availability is served. Parties that wish to obtain a copy of the testimony in support of the Application should contact:

Cynthia Russell
California American Water
333 Hayes Street, Suite 202
San Francisco, CA 94102
Tel: 1-415-293-3022
Fax: 1-415-863-0615
cynthia.russell@amwater.com

Testimony in Support of the Application:

- Direct Testimony of Sherrene Chew
- Direct Testimony of Jeffrey Linam
- Direct Testimony of Eric Sabolsice
- Direct Testimony of David Stoldt

VERIFICATION

I, the undersigned, say:

I am an officer of CALIFORNIA-AMERICAN WATER COMPANY, a corporation, and am authorized to make this verification for and on behalf of CALIFORNIA-AMERICAN WATER COMPANY, and I make this verification for that reason. I have read the foregoing application, am informed and believe the matters therein are true, and on that ground, allege that the matters stated therein are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Sacramento, California, July 8, 2015.

CALIFORNIA-AMERICAN WATER COMPANY

By: 
Richard Svindland