



FILED

01/02/26

04:59 PM

A2601001

EXHIBIT F

COMPLIANCE REPORT PER DECISION NO. 24-02-014

Decision Adopting Settlement Agreement Between Corix Infrastructure Inc., Corix Infrastructure (US) Inc., IIF Subway Investment LP, SW Merger Acquisition Corp., SouthWest Water Company, Suburban Water Systems, and the Public Advocates Office

Note: Information provided in this compliance report is for period Jan. 1 – Sept. 30, 2025. Data for the balance of 2025 is not available at the time this report is being prepared for Suburban’s GRC Proposed Application filing date of November 3, 2025. Suburban will provide the balance of data in the first quarter of 2026.

Appendix A – Settlement Agreement

Section IV. B. Resolution

1. Suburban shall provide high-quality water utility services to its customers. In Suburban’s three (test years 2027, 2030, and 2033) general rate cases (“GRCs”) following the close of the Proposed Transaction, Suburban agrees to provide detailed reports regarding service quality:
 - a. Customer Complaints: Suburban shall report the number of customer CPUC and water quality complaints received in each of the last three years, categorized by major subject areas. Suburban will continue to use the same process to identify and record a complaint that is currently uses in reporting complaints in accordance with D.07-05-062, Rate Case Plan for Class A Water Utilities, Minimum Data Requirement H.1. Suburban shall provide an explanation regarding any increase in complaints per active connection.

Response:

The following table represents Suburban’s customers’ CPUC and water quality complaints.

Type	Description	2022	2023	2024
CPUC Complaint	Billing Issue (High Bill)	12	6	7
CPUC Complaint	Dunning Process		1	1
CPUC Complaint	Field - Customer Service		2	
CPUC Complaint	Meter Error	1	1	
CPUC Complaint	Tariff Issue			1
CPUC Complaint	Usage Complaint		2	1
	<i>Subtotal CPUC Complaints</i>	13	12	10
Water Quality Complaint	Taste/Odor	25	23	18
Water Quality Complaint	Color	81	49	35
Water Quality Complaint	Turbidity (Particles)	18	8	13
Water Quality Complaint	Other (Includes Cloudy)	19	23	22
	<i>Subtotal Water Quality Complaints</i>	143	103	88
	<i>Total CPUC and Water Quality Complaints</i>	156	115	98

- b. Water Quality: Suburban shall provide a report summarizing any non-compliance with maximum contaminant levels (“MCLs”) since the last GRC, summarizing any Treatment Techniques or Action Level exceedances, and summarizing any Notification Levels or Response Level exceedances. Suburban will include with its report copies of California State Water Resources Control Board Division of Drinking Water (“DDW”) citations issued to Suburban, if any, and copies of the last DDW inspection reports and letters of violations, if any, Suburban shall provide any explanation of any increase in water quality events.

Response:

Please see Suburban’s response to MDR Section G for the response.

Since the last GRC Suburban has been in compliance with all MCL’s and has not had any Treatment Technique or Action Level exceedances.

There have been multiple Notification Level and Response Level exceedances. See MDR Section G.3 for a list of the exceedances. Also see the attachments to the MDR references in Section G.3 for the governing body notifications related to these exceedances.

See MDR Section G.5 for DDW citations and for Suburban’s responses to the Citations as well as references to the attachments to the MDR for citations and responses. See MDR Section G.6 for all DDW inspection reports and Section G.7 for Suburban’s responses, as well as for the references to the attached documents in the MDR.

The increase in water quality events is due to the prevalence and evolving regulation of PFAS chemicals in the environment. The increase in these events demonstrates the continued need for the Commission to support Suburban’s efforts to install treatment equipment to remove PFAS from water served to customers. The increase in water quality events can also be attributed to the increasing demands that evolving regulations have on Suburban’s Water Quality personnel. The increase in demands and resulting events demonstrate Suburban’s need for additional Water Quality technicians to comply with the expanded Cross-Connection Control Program requirements outlined in the Direct Testimony of Michael De Ghetto.

Performance Incentive Mechanism (PIM)

PIM-1

Customer Complaints: Suburban shall report the number of customer CPUC¹ and water quality complaints² received in each of the last three years, categorized by major subject areas. Suburban shall provide an explanation regarding any increase in complaints. Customer service performance shall be measured against a 0.30% rate of PUC and water quality complaints per active connection (“Benchmark Complaint Rate”).³

The Test Year 2027 rate case will compare the average results for the two years 2024 and 2025 to the Benchmark Complaint Rate. The Test Year 3030 rate case will compare the average results for the three years 2026, 2027, and 2028 to the Benchmark Complaint Rate.

The Test Year 2033 rate case will compare the average results for the three years 2029, 2030, and 2031 to the Benchmark Complaint Rate. Any direct impact on Suburban’s results during a state or federal declared emergency that affects drinking water service in Suburban’s territory would be excluded from the PIM.

Response:

Type	Description	2024	Jan. 1 – Sept. 30, 2025
CPUC Complaint	Billing Issue (High Bill)	7	5
CPUC Complaint	Dunning Process	1	
CPUC Complaint	Tariff Issue	1	
CPUC Complaint	Usage Complaint	1	
	<i>Subtotal CPUC Complaints</i>	10	5
Water Quality Complaint	Taste/Odor	18	17
Water Quality Complaint	Color	35	43
Water Quality Complaint	Turbidity (Particles)	13	6
Water Quality Complaint	Other (Includes Cloudy)	22	18
	<i>Subtotal Water Quality Complaints</i>	88	84
	<i>Total CPUC and Water Quality Complaints</i>	98	89
	Active Connection Count	78,309	78,412
	Benchmark Complaint Rate	235	235

PIM-2

(General Order 103-A Appendix E (1A)) Telephone Performance Standards – Call answer performance measures.

¹ CPUC water quality complaints are complaints submitted by Suburban customers to the CPUC’s Consumer Affairs Branch.

² Parties agree to use the number of Water Quality Complaints submitted by Suburban in its GRCs, in response to Minimum Data Requirement H.1. Suburban will continue to use the same process to identify and record a complaint that it currently uses in reporting complaints in response to Minimum Data Requirement H.1.

³ 0.30% x Total Number of Active Connections = Benchmark Complaint Rate.

Call Answering Service Level: Percentage of customers reaching a utility representative during normal business hours within 30 seconds after requesting to speak with a customer service representative (CSR). Performance shall be calculated as follows:

Number of calls reaching a utility representative within 30 seconds divided by number of attempts to reach a utility representative.

Performance measure: greater than or equal to 80%.

Source of data: data obtained from the utility's ACD system. The data will include all calls reaching the ACD during the normal business hours.

The Test Year 2027 rate case will compare the average results for the two years 2024 and 2025 to the performance measure above. The Test Year 2030 rate case will compare the average results for the three years 2026, 2027, and 2028 to the performance measure above. The Test Year 2033 rate case will compare the average results for the three years 2029, 2030, and 2031 to the performance measure above.

Response:

PIM – 2	Goal	2024	Jan. 1 – Sept. 30, 2025
Total Calls Received		54,454	46,742
Number of Calls Answered Within 30 seconds		52,587	44,959
Percentage of Calls Answered Within 30 Seconds	> or = 80%	96.6%	96.2%

PIM-3

(General Order 103-A Appendix E (1B)) Telephone Performance Standards – Abandoned call rate performance measures.

Abandoned call rate during normal business hours: Percentage of calls abandoned before reaching a utility representative (requested by the customer) during normal business. Performance shall be calculated as follows:

Number of calls abandoned/Number of attempts to reach a utility representative Abandoned call rate performance measure: less than or equal to 5%.

The Test Year 2027 rate case will compare the average results for the two years 2024 and 2025, to the performance measure above. The Test Year 2030 rate case will compare the average results for the three years 2026, 2027, and 2028 to the performance measure above. The Test Year 2033 rate case will compare the average results for the three years 2029, 2030, and 2031 to the performance measure above.

Response:

PIM – 3	Goal	2024	Jan. 1 – Sept. 30, 2025
Total Calls Received		54,454	46,742
Number of Calls Abandoned		1,313	1,380
Abandoned Call Rate	< or = 5%	2.4%	3.0%

PIM-4

(General Order 103-A Appendix E (1C)) Billing Performance Standards – Bill rendering performance measures.

Percentage of bills rendered (mailed) within seven calendar days of the scheduled billing date. Performance shall be calculated as follows:

Number of bills not rendered within seven calendar days of the scheduled billing date/Total number of bills scheduled to be rendered.

Exclusions: The measurement will exclude accounts that were activated within 10 calendar days prior to the normal billing cycle; accounts that are scheduled to receive a final bill within 10 calendar days after the normal billing cycle; off-system sales; utility use accounts; periods during which rates are changed.

Bill rendering performance measure: greater than or equal to 99%

Source of data: This standard shall be measured by using data obtained from the utility's Customer Information System, or equivalent records. Results shall be reported to one decimal place.

Response:

PIM – 4	Goal	2024	Jan. 1 – Sept. 30, 2025
Total Bills Scheduled to be Rendered		933,050	702,537
Number of Bills Not Rendered Within Seven Calendar Days		1,513	1,066
Percentage of Bills Rendered Within Seven Calendar Days	> or = 99.0%	99.8%	99.8%

PIM-5

(General Order 103-A Appendix E (2B)) Billing Performance Standards – Bill accuracy performance measures.

Bills found inaccurate: Percentage of bills found inaccurate after being sent to customers, brought to a utility's attention either as result of customer complaints and/or by the utility's own

efforts. Performance shall be calculated as follows: Number of bills rendered inaccurately for the cycle/Total number of bills rendered for the billing cycle

Exclusions: This standard does not include bills found to be inaccurate strictly as result of estimation, bills where the inaccuracy does not affect the calculation of the bill, or where the fault does not lie with the utility.

Percentage of inaccurate bills performance measure: less than or equal to 3.0%. Source of data: This standard shall be measured by using data obtained from the utility's Customer Information System or equivalent records. Results shall be reported to the second decimal place.

The Test Year 2027 rate case will compare the average results for the two years 2024, and 2025 to the performance measure above. The Test Year 2030 rate case will compare the average results for the three years 2026, 2027, and 2028 to the performance measure above. The Test Year 2033 rate case will compare the average results for the three years 2029, 2030, and 2031 to the performance measure above.

Response:

PIM – 5	Goal	2024	Jan. 1 – Sept. 30, 2025
Total Bills Rendered		931,537	701,471
Number of Inaccurate Bills Rendered		1,513	1,066
Percentage of Inaccurate Bills Rendered	< or = 3.0%	0.16%	0.15%

PIM-6

(General Order 103-A Appendix E (5A)) Response to Customer and Regulatory Complaints Performance Standard – Rate of Complaints to the Commission's Consumer Affairs Branch (CAB):

Percentage of customers who file complaints with the Commission's CAB. Performance shall be calculated as follows:

Number of complaints reported annually to the utility by the CAB/Total number of customers
Performance measure: less than or equal to 0.1 %

Source of data: Data shall be obtained from the quarterly reports provided by the Commission to the utility from the Commission's Consumer Affairs Tracking System. Results shall be reported to the second decimal place.

The Test Year 2027 rate case will compare the average results for the two years 2024 and 2025 to the performance measure above. The Test Year 2030 rate case will compare the average results for the three years 2026, 2027, and 2028 to the performance measure above. The Test Year 2033 rate case will compare the average results for the three years 2029, 2030, and 2031 to the performance measure above.

Response:

PIM – 6	Goal	2024	Jan. 1 – Sept. 30, 2025
Total Number of Customers		78,309	78,412
Number of Complaints Reported to the Commission’s CAB		10	5
Percentage of Customers Who File Complaints with the Commission’s CAB	< or = 0.1%	0.01%	0.01%