

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 22, 2020

Proposed Resolution W-5223

Agenda ID: 18445

To: All Interested Persons

Enclosed is Proposed Resolution W-5223 of the Water Division, which determines that the term "interest charges" in Health And Safety Code Section 116914 (a)(2) includes any charges of fees that water utilities subject to Health And Safety Code Section 116904(b) impose on delinquent water bills. Proposed Resolution W-5223 is scheduled to appear on the June 25, 2020 Commission Meeting Agenda (ID#18445).

The Commission may act on this resolution or it may postpone action until later. When the Commission acts on a proposed resolution, the Commission may adopt all or part of the proposed resolution, as written, or amend or modify the proposed resolution; or the Commission may set the proposed resolution aside and prepare a different resolution. Only when the Commission acts does the resolution become binding.

Interested persons may submit comments on Proposed Resolution W-5223 via email to [Water.Division@cpuc.ca.gov](mailto:Water.Division@cpuc.ca.gov) on or before **June 11, 2020**. Please reference **"Proposed Resolution W-5223"** in the subject line.

Interested persons must also serve a copy of their comments on the utility on the same date that the comments are submitted to the Water Division. If email is unavailable, please submit comments to:

California Public Utilities Commission  
Water Division  
505 Van Ness Avenue  
San Francisco, CA 94102

Comments should focus on factual, legal, technical errors, or policy issues in the proposed resolution.

Persons interested in receiving comments submitted may contact the Water Division at [Water.Division@cpuc.ca.gov](mailto:Water.Division@cpuc.ca.gov) or (415) 703-1133. Please reference "Proposed Resolution W-5223."

/s/BRUCE DEBERRY

Bruce DeBerry, Program Manager  
Water Division

Enclosures: Proposed Resolution W-5223  
Certificate of Service  
Service List

# PROPOSED RESOLUTION

Resolution W-5223  
WD

Agenda ID #18445

## PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

WATER DIVISION

RESOLUTION W-5223

June 25, 2020

### RESOLUTION

(RES. W-5223) THIS RESOLUTION DETERMINES THAT THE TERM “INTEREST CHARGES” IN HEALTH AND SAFETY CODE SECTION 116914 (a)(2) INCLUDES ANY CHARGES OF FEES THAT WATER UTILITIES SUBJECT TO HEALTH AND SAFETY CODE SECTION 116904(b) IMPOSE ON DELINQUENT WATER BILLS.

---

### SUMMARY

This Resolution addresses the implementation of Health and Safety Code Section 116914(a)(2) in Tier 1 Advice Letters filed by Commission-jurisdictional water utilities in compliance with Health and Safety Code Section 116904(b). This Resolution concludes that the term “interest charges” in Health and Safety Code Section 116914(a)(2) includes any late-payment charges or fees imposed on delinquent water bills. Water utilities that are subject to Health and Safety Code Section 116904(b) and that impose any charges or fees on delinquent water bills pursuant to their Tariffs shall revise their Tariffs to include the provision as stated in Health and Safety Code Section 116914(a)(2) as ordered by this Resolution. The Tariff changes are effective February 1, 2020 pursuant to Health and Safety Code Section 116904(b).

### BACKGROUND

All Californians are ensured the right to safe, clean, affordable, and accessible water as declared by Section 106.3 of the Water Code. On September 28, 2018, then California Governor Jerry Brown signed into law Senate Bill 998, which added Chapter 6, the Water Shutoff Protection Act (“Act”), to Part 12 of Division 104 of the Health and Safety

# PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

Code (H&S Code). The Act modifies water utilities' practices regarding disconnection of their customers' water service due to nonpayment of water bills, thereby ensuring customers the right to water. In particular, the Act defines mandates that protect a target population of beneficiaries: residential customers with a household income below two hundred percent (200%) of the federal poverty level (H&S Code § 116914). One of these mandates is the waiving of interest charges imposed on delinquent water bills once every twelve (12) months (H&S Code § 116914(a)(2)).

On December 10, 2019, Water Division instructed Commission-jurisdictional water utilities subject to H&S Code § 116904(b) to file individual Advice Letters implementing the provisions mandated in the Act into their tariffs. Water Division requested the effected water utilities to submit individual advice letters by January 27, 2020 in order to meet the compliance date of February 1, 2020 as mandated in the Act.

## **NOTICE AND PROTESTS**

Nine Class A water utilities, three Class B water utilities, fifteen Class C water utilities, and seven Class D water utilities submitted advice letters in compliance with H&S Code § 116904(b) and Water Industry Rule 7.3.1(3) of General Order 96-B.

California Public Advocates Office (Cal PA) timely protested Liberty Park Water's AL 296-W on February 11, 2020; Liberty Apple Valley's AL 238-W and Suburban's AL 344-W on February 12, 2020; Cal Water's AL 2372-W on February 13, 2020; and Great Oaks' AL 283-W on February 18, 2020. Cal PA's protests raised a number of issues regarding the compliance of utility advice letters with the Act. Water Division resolved all but one of the issues raised in Cal PA's protests through a disposition letter issued March 13, 2020. The one outstanding issue raised in Cal PA's protests and resolved in this resolution is whether the wording of H&S Code § 116914(a)(2) which requires waiver of interest charges on delinquent bills once every 12 months applies to late-payment fees/charges found in some water utility tariffs.

# PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

## DISCUSSION

### *Interpretation of the Term “Interest Charges” In H&S Code § 116914(a)(2)*

Liberty Apple Valley Ranchos Water Company (“Liberty Apple Valley”), Liberty Park Water Company (“Liberty Park Water”), California Water Service Company (“Cal Water”), and Suburban Water Systems (“Suburban”), hereon referred to collectively as “Utilities”, responded to Public Advocates Office’s (“Cal PA”) individual protests to Advice Letter Nos. 238-W, 296-W, 2372-W, and 344-W, respectively. The one unresolved matter in Cal PA’s protests is the Utilities failed to include the provision stated in H&S Code § 116914(a)(2) that for customers with household income below 200% of the federal poverty level, utilities are to “Waive interest charges on delinquent bills once every 12 months.” The common response in the Utilities’ individual replies to Cal PA’s protests is that each utility is not authorized by the Commission to impose “interest” charges on delinquent water bills and, as such, H&S Code § 116914(a)(2) is inapplicable. However, Liberty Apple Valley, Liberty Park Water, and California-American Water Company (“Cal-Am”) include a charge on delinquent water bills in their individual tariff schedules. The charge is referred to as either a “Late Payment Fee” or a “Late Payment Charge” without explicitly using the term “interest charge.” The utilities argue that H&S Code § 116914(a)(2) does not extend to either a Late Payment Fee or a Late Payment Charge.

With respect to H&S Code § 116914(a)(2), the Utilities interpret the term “interest” on the basis of a standard rule of statutory construction known as the “plain meaning” rule:

[I]n the interpretation of a statute, where the language is clear, its plain meaning should be followed.

Great Lakes Properties, Inc. v. El Segundo (1977) 19 Cal.3d 152, 155  
(citations omitted.)

Black’s Law dictionary defines “interest rate” as “the cost of borrowing funds or capital earned on loaned funds.” The Oxford Dictionary defines “interest” as “money paid regularly at a particular rate for the use of money lent, or for delaying the repayment of a debt.” Therefore, it is alleged by the Utilities that in the case of water utilities that elect to impose any charges on delinquent water bills without explicitly stating those charges

## PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

to be “interest”, those charges are not subject to the requirement under H&S Code § 116914(a)(2).

The Commission has standard templates for various tariff provisions, but it does not have a standard template for a schedule imposing charges on delinquent water bills. Although the Commission approves proposed tariff schedules covering these charges, it does not dictate how the water utilities are to structure the conditions for imposing those charges. Liberty Apple Valley’s and Liberty Park Water’s tariffs include “Schedule No. LC: Late Payment Charge.” This schedule lists several “Special Conditions”, one stating:

The late charge should be imposed only once on a delinquent bill since the account would be shut off before a subsequent bill...

The terms “interest” and “interest rates” are not used in this schedule. Imposing the “Late Payment Charge” once on a delinquent bill can be viewed as a functional difference from the technical definition of the term “interest.” Cal-Am’s Schedule No. CA-FEES differs from Liberty Apple Valley’s and Liberty Park Water’s Schedule No. LC. Cal-Am compounds its “Late Payment Fee” over all balances that are past due:

A late charge of 1.5% on unpaid balance will be assessed customers will be notified on the monthly issued bill that the 1.5% late fee will be applied to any account that is not paid before the past due date shown on the bill. . . . the fee shall be assessed on all open balances regardless of whether it is an initial or subsequent bill when a total balance has not been paid or there should have been a shut off for non-payment agreement. . . .

Cal-Am’s practice of assessing the “Late Payment Fee” over all past due balances is functionally similar to the technical definition of “interest.” However, Schedule No. CA-FEES also does not explicitly use the terms “interest” nor “interest rates”.

### Enforcing the Intent of the Legislature

Courts presume that every word of a statute has meaning and disfavor statutory interpretation that renders words meaningless:

# PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

[W]henever possible, significance must be given to every word [in a statute] in pursuing the legislative purpose, and the court should avoid a construction that makes some words surplusage.

People v. Rodriguez (2012) 55 Cal.4th 1125, 1131 (citations omitted.)

Commission-jurisdictional water utilities shall comply with the provisions of the Act on and after February 1, 2020 pursuant to H&S Code § 116904(b). Permitting water utilities to interpret the term “interest” by its “plain meaning” allows them to control their compliance with the Act by manipulating the descriptions and conditions of any charges imposed on delinquent bills that are stated in their tariff schedules. This interpretation renders the requirement in H&S Code § 116914(a)(2) meaningless since this provision as read by the Utilities only applies to the waiving of “interest charges” imposed on delinquent water bills. Water utilities would be complying under terms that they defined through alternate statutory interpretation of the legislature rather than comply under terms the legislature enacted with specific intent. Courts have found that the “plain meaning” rule cannot be used to thwart the purpose of the legislation:

[T]he ‘plain meaning’ rule does not prohibit a court from determining whether the literal meaning of the statute comports with its purpose or whether such a construction of one provision is consistent with other provisions of the statute. The meaning of the statute may not be determined from a single word or sentence; the words must be construed in context, and provisions relating to the same subject matter must be harmonized to the extent possible. Literal construction should not prevail if it is contrary to the legislative intent apparent in the statute. The intent prevails over the letter, and the letter will, if possible, be so read as to conform to the spirit of the act.

Lungren v. Deukmejian (1988) 45 Cal.3d 727, 735 (citations omitted.)

The legislative history of Senate Bill 998 outlines one of its purposes, which is the establishment of a consistent statewide structure for assisting low-income customers that are at risk of having their water service discontinued due to inability to pay:

Since water is a necessity for life, and since California has declared that access to safe and affordable water is a human right, many low-income ratepayers face troubling trade-offs in order to pay water bills.

# PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

Establishing a statewide structure for helping low income ratepayers cope with increasing water rates will reduce difficult tradeoffs families will have to make and improve overall health and safety for many communities and households.

(Assem. Com. On Environmental Safety and Toxic Materials, Rep. on Sen. Bill No. 998 (2017-2018 Reg. Sess.) June 26, 2018, p. 4.)

The legislative history firmly establishes that the intent of the Act is to provide economic relief to low-income customers, as codified in the Act to be the customers that demonstrate a household income below two hundred percent (200%) of the federal poverty level. By the Utilities' narrow interpretation of the word "interest", any charges or fees that water utilities elect to impose on delinquent water bills are not to be waived under H&S Code § 116914(a)(2). Although these charges may impose economic hardship onto the population of customers that this provision intends to protect, the Utilities' interpretation would find that the waiver does not apply to those customers' delinquent water bills. This result contradicts the very intent of the Act.

The provision that waives interest charges was included in the Act since its inception. The Act itself does not define the term "interest charges," nor does it mention the term "interest charges" other than in § 116914(a)(2). There is also no indication in the Act that the term "interest charges" is to be interpreted through its technical definition. Instead, the placement of the term "interest charges" in the H&S Code § 116914(a)(2) and the intent of that section to offer economic relief to low-income customers suggests that the term is intended to represent any charges or fees imposed on delinquent water bills.

## Conclusion

Commission-jurisdictional water utilities may elect to impose charges or fees on delinquent water bills and describe the conditions of these fees or charges in proposed tariff revisions subject to Commission approval. In order to comply with the legislative intent of the Water Shutoff Protection Act, and H&S Code § 116914(a)(2) specifically, these fees or charges are to be interpreted as "interest" and should be subject to the provision in H&S Code § 116914(a)(2). Water utilities subject to the H&S Code § 116904(b) and that include a late-payment fee or charge in their Tariff shall revise their Tariff to comply with H&S Code § 116914(a)(2) in two ways.

# PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

First, a new section B.1.a(3) should be added to Tariff Rule 11 that reads:

"Waiving of [Late Payment Charge/Fee/etc.]. For a customer taking Residential Service who demonstrates household income below 200 percent of the federal poverty level (or is otherwise deemed by the Water Shutoff Protection Act as having a household income of below 200 percent of the federal poverty level), the [Late Payment Charge/Fee/etc.] on past-due bills as authorized in [Schedule No.] shall be waived once every 12 months."

Second, the following language should be added to the Late Payment Fee or Charge Schedule as a separate special condition:

"A customer taking Residential Service, whose household income is below 200 percent of the federal poverty level, is entitled to have late payment charges on delinquent bills waived once every twelve (12) months pursuant to Tariff Rule No. 11.B.1.a(3)."

Pursuant to H&S Code §116904(b), these Tariff changes should be made effective retroactive to February 1, 2020.

## COMMENTS

Public Utilities Code Section 311(g)(1) provides that resolutions generally must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission.

Accordingly, this proposed resolution was mailed to the utilities and their service lists and made available for public comment on May 22, 2020.

## FINDINGS AND CONCLUSIONS

1. Senate Bill 998, which added Chapter 6, the Water Shutoff Protection Act ("Act"), to Part 12 of Division 104 of the Health and Safety Code, was signed into law on September 28, 2018.



# PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

2. Commission-jurisdictional water utilities submitted advice letters to amend their tariff rules in compliance with Health and Safety Code Section 116904(b).
3. The California Public Advocates Office filed timely protests on a number of water utilities compliance advice letter for failure to implement the Act, including Health and Safety Code Section 116914(a)(2).
4. Health and Safety Code Section 116914(a)(2) provides that for a residential customer who demonstrates to an urban and community water system household income below 200 percent of the federal poverty level, the urban and community water system shall waive interest charges on delinquent bills once every 12 months.
5. The utilities' responses to California Public Advocates Office's protests indicates that utilities are not authorized by the Commission to charge interest on delinquent bills and, as such, Health and Safety Code Section 116914(a)(2) is not applicable and need not be included in utilities' tariff rules.
6. Three Class A utilities and numerous smaller utilities include a charge on delinquent water bills in their individual tariff schedules. The charge is referred to as either a "Late Payment Fee" or a "Late Payment Charge" without explicitly using the term interest charge.
7. The legislative history of Senate Bill 998 outlines one of its purposes, which is the establishment of a consistent statewide structure for assisting low-income customers that are at risk of having their water service discontinued due to inability to pay.
8. In interpreting statutes, courts presume that every word of a statute has meaning and disfavor statutory interpretation that renders words meaningless.
9. The California Supreme Court in *Lungren v. Deukmejian* (1988) states that: "The meaning of the statute may not be determined from a single word or sentence; the words must be construed in context, and provisions relating to the same subject matter must be harmonized to the extent possible. Literal construction should not prevail if it is contrary to the legislative intent apparent in the statute. The intent prevails over the letter, and the letter will, if possible, be so read as to conform to the spirit of the act."
10. The term "interest charge" should not be interpreted by its plain meaning, rather the legislative intent is to include any charges that water utilities may elect to impose on delinquent water bills.
11. It is reasonable that water utilities subject to the Act and that include a late-payment fee or charge in their Tariffs should amend their Tariff Rules and late-

## PROPOSED RESOLUTION

Resolution W-5223

June 25, 2020

WD

payment fee or charge schedule to include the provision in Health and Safety Code Section 116914(a)(2) effective February 1, 2020.

# PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

## **THEREFORE, IT IS ORDERED THAT:**

1. Water utilities subject to Health and Safety Code Section 116904(b) that have in their Tariff a late-payment fee or charge shall file a Tier 1 advice letter within twenty days of the effective date of this Resolution to:
  - a. Revise Tariff Rule 11 to include the provision as stated in Health and Safety Code Section 116914(a)(2) by adding the following language as a new Section B.1.a(3): "Waiving of [Late Payment Charge/Fee/etc.]. For a customer taking Residential Service who demonstrates household income below 200 percent of the federal poverty level (or is otherwise deemed by the Water Shutoff Protection Act as having a household income of below 200 percent of the federal poverty level), the [Late Payment Charge/Fee/etc.] on past-due bills as authorized in [Schedule No.] shall be waived once every 12 months."
  - b. Add the following language to the Late Payment Fee or Charge Schedule as a separate special condition: "A customer taking Residential Service, whose household income is below 200 percent of the federal poverty level, is entitled to have late payment charges on delinquent bills waived once every twelve (12) months pursuant to Tariff Rule No. 11.B.1.a(3)."
  - c. Revise existing special conditions as necessary in the Late Payment Fee or Charge Schedule consistent with revisions to Tariff Rules pursuant to Water Shutoff Protection Act.
2. Revisions to Utility Tariffs required in Ordering Paragraph No. 1 are effective beginning February 1, 2020.

## PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

This resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on June 25, 2020; the following Commissioners voting favorably thereon:

---

ALICE STEBBINS  
Executive Director

## PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

## CERTIFICATE OF SERVICE

I certify that I have by either electronic mail or postal mail, this day, served a true copy of Proposed Resolution No. W-5223 on all parties in these filings or their attorneys as shown on the attached lists.

Dated May 22, 2020, at San Francisco, California.

/s/ROBIN BRYANT

---

Robin Bryant

Parties should notify the Water Division, Third Floor, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102, of any change of address to ensure that they continue to receive documents. You must indicate the Resolution number on which your name appears.

# PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

## SERVICE LIST

### Water Utility Companies with 200+ Connections

Sean Gray (Agate Bay) [Seangray00@gmail.com](mailto:Seangray00@gmail.com)  
Steve Glazer (Agate Bay) [glazerwest@att.net](mailto:glazerwest@att.net)  
Andrea Schmitz (Alco Water) [andrea@alcowater.com](mailto:andrea@alcowater.com)  
Andy Clarke (Alisal) [andy@alcowater.com](mailto:andy@alcowater.com)  
Thomas Adcock (Alisal) [tom@alcowater.com](mailto:tom@alcowater.com)  
Richard Tim Bakman (Bakman) [tim@bakman.com](mailto:tim@bakman.com)  
Shay Bakman (Bakman) [shay@bakmanwater.com](mailto:shay@bakmanwater.com)  
Stephen Welch (Bass Lake) [steview@basslakerealty.com](mailto:steview@basslakerealty.com)  
Big Basin Water Company [bbwater197@yahoo.com](mailto:bbwater197@yahoo.com)  
Jim Moore (Big Basin Water) [sjmoore600@aol.com](mailto:sjmoore600@aol.com)  
Cal Am Rates [ca.rates@amwater.com](mailto:ca.rates@amwater.com)  
Jeffrey T. Linam (Cal Am) [Jeffrey.Linam@amwater.com](mailto:Jeffrey.Linam@amwater.com)  
Jonathan Morse (Cal Am) [jonathan.morse@amwater.com](mailto:jonathan.morse@amwater.com)  
Kamilah Jones (Cal Am) [kamilah.jones@amwater.com](mailto:kamilah.jones@amwater.com)  
Lakhjit S Thind (Cal Am) [Lakhjit.Thind@amwater.com](mailto:Lakhjit.Thind@amwater.com)  
Preet Nagra (Cal Am) [Preet.Nagra@amwater.com](mailto:Preet.Nagra@amwater.com)  
James Polanco (Cal Water) [jpolanco@calwater.com](mailto:jpolanco@calwater.com)  
Melody Singh (Cal Water) [Msingh@calwater.com](mailto:Msingh@calwater.com)  
Natalie Wales (Cal Water) [nwales@calwater.com](mailto:nwales@calwater.com)  
Paul Townsley (Cal Water) [ptownsley@calwater.com](mailto:ptownsley@calwater.com)  
[carmellahaina@aol.com](mailto:carmellahaina@aol.com)  
Jacqueline Zischke (Canada Woods Water) [jzischkelaw@charter.net](mailto:jzischkelaw@charter.net)  
[rawilliams@carmeldevelopment.com](mailto:rawilliams@carmeldevelopment.com)  
Pete Kerns (Cold Springs) [office@coldspringswater.com](mailto:office@coldspringswater.com)  
Sandra Tucker (Cold Springs) [sandra@coldspringsrealty.com](mailto:sandra@coldspringsrealty.com)  
Chris Aldinger (Consultant) [chris@paocpas.com](mailto:chris@paocpas.com)  
Edmund Viray (Consultant) [eviray88@gmail.com](mailto:eviray88@gmail.com)  
Frank Brommenchenkel (Consultant) [frank.brommen@verizon.net](mailto:frank.brommen@verizon.net)  
Marino Rodriguez (Consultant) [marinorod@aol.com](mailto:marinorod@aol.com)  
Bob Fortino (Del Oro) [corp.ceo@corporatecenter.us](mailto:corp.ceo@corporatecenter.us)  
Janice Hanna (Del Oro) [jeh@corporatecenter.us](mailto:jeh@corporatecenter.us)  
Lori Charlesworth (Del Oro) [administrativeassistant@corporatecenter.us](mailto:administrativeassistant@corporatecenter.us)

## PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

Lawrence Morales (East Pasadena) [lawrence@epwater.com](mailto:lawrence@epwater.com)  
Patricia Ginsberg (EPWC/FVWC Consultant) [patricia@paocpas.com](mailto:patricia@paocpas.com)  
Nicholas Silicz (Erskine) [erskinecreekh2o@aol.com](mailto:erskinecreekh2o@aol.com)  
Craig Fox (Fulton) [fulton@yahoo.com](mailto:fulton@yahoo.com)  
Estrada, Gladys (Golden State) [GROSEND0@gswater.com](mailto:GROSEND0@gswater.com)  
Jon Pierotti (Golden State) [Jon.Pierotti@gswater.com](mailto:Jon.Pierotti@gswater.com)  
Keith Switzer (Golden State) [kswitzer@gswater.com](mailto:kswitzer@gswater.com)  
Regulatory Affairs - GSWC [GSWC\\_Reg\\_Affairs@gswater.com](mailto:GSWC_Reg_Affairs@gswater.com)  
Ronald K. Moore (Golden State) [RKMOORE@gswater.com](mailto:RKMOORE@gswater.com)  
Daniel West (Graeagle) [west@playgraeagle.com](mailto:west@playgraeagle.com)  
Cindy Holms (Graeagle) ([gwc@playgraeagle.com](mailto:gwc@playgraeagle.com))  
Timothy S. Guster (Great Oaks) [tguster@greatoakswater.com](mailto:tguster@greatoakswater.com)  
Diane Holley [diane@jhodgesoffice.com](mailto:diane@jhodgesoffice.com)  
Jennifer Hodges (Havasui) [cnmoney@aol.com](mailto:cnmoney@aol.com)  
James F. Foster (Hillview) [h2o@sti.net](mailto:h2o@sti.net)  
Jim Downey [jbdwny@cs.com](mailto:jbdwny@cs.com)  
Julie Cavaz (Kenwood) [julie@mfcomputing.com](mailto:julie@mfcomputing.com)  
Kimi Johnson (Lake Alpine) [info@lakealpinewater.com](mailto:info@lakealpinewater.com)  
Roma Orvis [romaorvis@gmail.com](mailto:romaorvis@gmail.com)  
Edward N. Jackson (Liberty Utilities) [edward.jackson@libertyutilities.com](mailto:edward.jackson@libertyutilities.com)  
AnnMarie Lett (Liberty Utilities) [AnnMarie.Lett@Libertyutilities.com](mailto:AnnMarie.Lett@Libertyutilities.com)  
Tiffany Thong (Liberty Utilities) [Tiffany.Thong@libertyutilities.com](mailto:Tiffany.Thong@libertyutilities.com)  
Chris Benitez (Liberty Utilities), [chris.benitez@libertyutilities.com](mailto:chris.benitez@libertyutilities.com)  
David Morisoli (Little Bear) [dmorisoli@hotmail.com](mailto:dmorisoli@hotmail.com)  
Jennifer Lukins (Lukins) [jennifer@lukinswater.com](mailto:jennifer@lukinswater.com)  
Lukins Brothers Water Company [danny@lukinswater.com](mailto:danny@lukinswater.com)  
Timothy Flynn (Mesa Crest) [mcwch2o@aol.com](mailto:mcwch2o@aol.com)  
Scott Kissack (Mountain Mesa) [skissack@msn.com](mailto:skissack@msn.com)  
'Tim Bean, President (Nacimiento)' [nacimientowater@earthlink.net](mailto:nacimientowater@earthlink.net)  
Suzette Eissler (North Gualala) [office@ngwco.com](mailto:office@ngwco.com)  
James B. Downey (Penngrove) [jbdwny@cs.com](mailto:jbdwny@cs.com)  
Julie Cavaz (Penngrove) [julie@mfcomputing.com](mailto:julie@mfcomputing.com)  
William Hay (Point Arena) [paww@mcn.org](mailto:paww@mcn.org)  
John Chris Nickel (Rio Plaza) [chrisn148@aol.com](mailto:chrisn148@aol.com)  
Daniel Rogina (Rogina) [drogina@pacific.net](mailto:drogina@pacific.net)

# PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

Arnie Peterson (Rolling Green Water) [rollinggreenutilities@gmail.com](mailto:rollinggreenutilities@gmail.com)  
Charles Baker (Rural Water) [ruralwater@me.com](mailto:ruralwater@me.com)  
Christina Sluss (San Gabriel) [cssluss@sgvwater.com](mailto:cssluss@sgvwater.com)  
Daniel Dell'Osa (San Gabriel) [dadellosa@sgvwater.com](mailto:dadellosa@sgvwater.com)  
Joel Reiker (San Gabriel) [jmreiker@sgvwater.com](mailto:jmreiker@sgvwater.com)  
Robert W. Nicholson (San Gabriel) [rwnicholson@sgvwater.com](mailto:rwnicholson@sgvwater.com)  
John Tang (San Jose) [john.tang@sjwater.com](mailto:john.tang@sjwater.com)  
Lindahl, Ann (San Jose) [ann.lindahl@sjwater.com](mailto:ann.lindahl@sjwater.com)  
Ellen Buechner (Sea Ranch) [ebuechner@tsra.org](mailto:ebuechner@tsra.org)  
Kathleen Ciabatti (Sea Ranch) [kciabatti@tsra.org](mailto:kciabatti@tsra.org)  
Audrey Schuyler (Searles) [schuylea@svminerals.com](mailto:schuylea@svminerals.com)  
Bill Ordwein (Sierra Park) [bill.ordwein@yahoo.com](mailto:bill.ordwein@yahoo.com)  
Christina A Males [CHRISTINA.MALES@sce.com](mailto:CHRISTINA.MALES@sce.com)  
Cooper Cameron (Southern CA Edison) [Cooper.Cameron@sce.com](mailto:Cooper.Cameron@sce.com)  
Darrah Morgan (SCE) [Darrah.morgan@sce.com](mailto:Darrah.morgan@sce.com)  
Southern California Edison [advicetariffmanager@sce.com](mailto:advicetariffmanager@sce.com)  
Jeanette Melgar (SCE) [Jeanette.melgar@sce.com](mailto:Jeanette.melgar@sce.com)  
Kerry Varney (Spreckels) [kerry@taproduce.com](mailto:kerry@taproduce.com)  
Spreckels Water Co. [rl@eslawfirm.com](mailto:rl@eslawfirm.com)  
Kiki Carlson (Suburban) [kcarlson@swwc.com](mailto:kcarlson@swwc.com)  
Robert L. Kelly (Suburban) [bkelly@swwc.com](mailto:bkelly@swwc.com)  
Robert Marr (Tahoe Cedars) [tch20co@aol.com](mailto:tch20co@aol.com)  
Richard Dewante (Tahoe Park) [rmdewante@sbcglobal.net](mailto:rmdewante@sbcglobal.net)  
Steven Glazer (Tahoe Swiss) [glazerwest@att.net](mailto:glazerwest@att.net)  
Loriann Boon (Warring Water) [water.warring@sbcglobal.net](mailto:water.warring@sbcglobal.net)  
Gerry Labudde (Weimar) [glabudde@hydros-engineering.com](mailto:glabudde@hydros-engineering.com)  
Robert D. Ukestad (West San Martin) [b.ukestad@wsmwater.com](mailto:b.ukestad@wsmwater.com)  
Robert Berry (Yerba Buena) [rberry34@aol.com](mailto:rberry34@aol.com)  
Jonathan Penrose (Yosemite) [jonathanp@yloa.org](mailto:jonathanp@yloa.org)  
Kenneth Harrington (Yosemite) [harrington.k@ypuc.org](mailto:harrington.k@ypuc.org)

## Cal PA

Richard Smith, Public Advocates Office Program Manager, [richard.smith@cpuc.ca.gov](mailto:richard.smith@cpuc.ca.gov)  
Richard Rauschmeier, Public Advocates Office, [richard.rauschmeier@cpuc.ca.gov](mailto:richard.rauschmeier@cpuc.ca.gov)  
Elizabeth Echols, Public Advocates Office Director, [elizabeth.echols@cpuc.ca.gov](mailto:elizabeth.echols@cpuc.ca.gov)



# PROPOSED RESOLUTION

Resolution W-5223  
WD

June 25, 2020

Chris Ungson, Public Advocates Office Deputy Director [chris.ungson@cpuc.ca.gov](mailto:chris.ungson@cpuc.ca.gov)  
Ting-Pong Yuen, Public Advocates Office [ting-pong.yuen@cpuc.ca.gov](mailto:ting-pong.yuen@cpuc.ca.gov)  
Hani Moussa, Public Advocates Office [hani.moussa@cpuc.ca.gov](mailto:hani.moussa@cpuc.ca.gov)  
Victor Chan, Public Advocates Office [victor.chan@cpuc.ca.gov](mailto:victor.chan@cpuc.ca.gov)  
Kerrie Evans, Public Advocates Office [kerrie.evans@cpuc.ca.gov](mailto:kerrie.evans@cpuc.ca.gov)  
Anthony Andrade, Public Advocates Office [anthony.andrade@cpuc.ca.gov](mailto:anthony.andrade@cpuc.ca.gov)  
[DRAWaterAL@cpuc.ca.gov](mailto:DRAWaterAL@cpuc.ca.gov)  
[PublicAdvocatesOffice@cpuc.ca.gov](mailto:PublicAdvocatesOffice@cpuc.ca.gov)

## **CPUC Water Division**

Bruce DeBerry, Water Division [bruce.deberry@cpuc.ca.gov](mailto:bruce.deberry@cpuc.ca.gov)  
James Boothe, Water Division [james.boothe@cpuc.ca.gov](mailto:james.boothe@cpuc.ca.gov)  
Eustace Ednacot, Water Division [Eustace.ednacot@cpuc.ca.gov](mailto:Eustace.ednacot@cpuc.ca.gov)  
[water.division@cpuc.ca.gov](mailto:water.division@cpuc.ca.gov)

## **CPUC Commissioner and Executive staff distribution lists**

[commrandolphstaff@cpuc.ca.gov](mailto:commrandolphstaff@cpuc.ca.gov)  
[commissionershiromasstaff@cpuc.ca.gov](mailto:commissionershiromasstaff@cpuc.ca.gov)  
[CommissionerRechtschaffenStaff@cpuc.ca.gov](mailto:CommissionerRechtschaffenStaff@cpuc.ca.gov)  
[CommissionerGuzmanAcevesStaff@cpuc.ca.gov](mailto:CommissionerGuzmanAcevesStaff@cpuc.ca.gov)  
[commissionerbatjerooffice@cpuc.ca.gov](mailto:commissionerbatjerooffice@cpuc.ca.gov)  
[Executive\\_Directors\\_Office@cpuc.ca.gov](mailto:Executive_Directors_Office@cpuc.ca.gov)