PUBLIC ADVOCATES OFFICE  
CALIFORNIA PUBLIC UTILITIES COMMISSION  

REPORT ON  
SOUTHERN CALIFORNIA EDISON’S  
REQUEST TO ESTABLISH A MEMORANDUM  
ACCOUNT TO RECORD AND TRACK SYSTEM-WIDE  
PIPELINE ASSESSMENT COSTS FOR THE  
CATALINA WATER SYSTEM  

Application 20-04-010

Los Angeles, California  
July 30, 2020
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MEMORANDUM

This Report is prepared by the Public Advocates Office – Water Branch (“Cal Advocates”). Patricia Esule serves as Project Coordinator, under the supervision of Program and Project Supervisor Victor Chan. Emily Fisher serves as the Public Advocates Office legal counsel in this proceeding.
EXECUTIVE SUMMARY

Southern California Edison Company (“SCE”) filed A.20-04-010 on April 13, 2020. The application seeks Commission authority to establish Catalina Water Pipeline Assessment Memorandum Account (CWPAMA, or Memo Account).¹ SCE requests this Memo Account to record and track costs of conducting a system-wide pipeline assessment of water distribution pipelines, including both in-service and decommissioned pipelines in SCE’s Catalina Water Utility (Catalina Water) system.² The Catalina Water system is a Class-C water utility, serving approximately 2,000 customer accounts.³

Cal Advocates reviewed SCE’s application, testimony, and responses to discovery requests to-date, to evaluate whether SCE’s request is necessary and meets the established criteria in Standard Practice U-27-W (“SP U-27”) for establishing memo accounts.⁴ Based on this review, Cal Advocates has determined that SCE’s request does not meet the requirements of SP U-27, nor is a memo account necessary to recover the cost of performing a system-wide pipeline assessment. Accordingly, Cal Advocates recommends that the Commission deny SCE’s request to establish the CWPAMA with prejudice. Should the Commission authorize the CWPAMA, however, the effective date of the Memo Account should be no earlier than the filing date of the Application (April 13, 2020).

¹ A.20-04-010, I. Introduction at p. 1.
² Ibid.
⁴ https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M090/K002/90002198.PDF at p. 6.
CHAPTER 1 SCE’S REQUEST FOR MEMORANDUM ACCOUNT

A. BACKGROUND
Water utilities may request Commission authorization to establish memo accounts through the formal application process, a general rate case (GRC) proceeding, or an Advice Letter (“AL”) reviewed by the Commission’s Water Division.

1. SCE’s Advice Letter 116-W
On January 28, 2020, SCE filed Advice Letter (“AL”) 116-W seeking Commission authority to establish a Catalina Water Utility Hazardous Substances Memorandum Account (“CWUHSMA”). The stated purpose of this memo account was to record and track costs associated with certain environmental remediation activities that SCE would be taking in connection with the Catalina Water system, including assessment, removal, and disposal of decommissioned pipeline, both below and above-ground. SCE estimated $28 million for this project.

On February 26, 2020, the Water Division issued a notice to SCE suspending the advice letter until June 20, 2020, stating that the requested memo account failed to meet the criteria in SP U-27 and requesting additional information. In the cover email to the suspension notice, Water Division staff recommended that “the project and memorandum account request be reviewed through a formal application,” due to the “high significant costs associated with the proposed project relative to the utility’s current authorized revenue requirement....” Water Division further noted that since SCE planned to file a GRC by the end of year 2020 for Catalina Water, the proposed environmental remediation project and memorandum account request could be included as part of SCE’s GRC filing, so that all of the capital improvement projects for the Catalina Water Utility

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6 AL 116-W, Purpose at p. 1.
7 AL 116-W, Preliminary Estimate of Costs at p. 4.
8 See Attachment C, Water Division Suspension Notice, February 26, 2020.
9 See Attachment B, Email dated February 26, 2020 from Moises Chavez of the Commission’s Water Division to SCE’s Advice Tariff Manager Cameron Cooper.
system could be reviewed in the same application. On May 7, 2020, SCE notified the Water Division that it was withdrawing AL 116-W due to its having filed an application.

On April 13, 2020, SCE filed A.20-04-010, requesting authority to establish the CWPAMA, which differs significantly in scope and dollar amount from the CWUHSMA requested earlier in the withdrawn AL 116-W. The scope of this application is to track and record costs associated with assessing and mapping the entire Catalina water system, including in-service and decommissioned pipeline, and pipeline composition, for an estimated cost of $900,000. Costs of removal and disposal of decommissioned pipeline would not be included in the CWPAMA. System-wide mapping and assessment was not included in the earlier scope of the CWUHSMA requested in AL 116-W.

SCE states that the need for system-wide assessment and mapping is due to SCE’s discovery of pipeline with coal-tar lining and exterior wrap containing polychlorinated biphenyls (PCBs) and asbestos in portions of the Two Harbors Water Pipeline. SCE claims that earlier in 2020, it removed most of the contaminated above-ground pipe and disposed of it according to the regulations governed by the Toxic Substance Control Act ("TSCA") and South Coast Air Quality Management District Rule 1403. SCE plans to remove and dispose of the remaining buried or partially buried decommissioned pipe. However, SCE has not indicated whether a project to remove and dispose of the remaining pipe will be included in its next GRC.

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10 Ibid.
11 see Attachment D, SCE’s May 7, 2020, notice to withdraw AL 116-W.
12 A.20-04-010, Section V. paragraph A. Scope of Work at p. 5.
13 Ibid Table V-1 at p. 8.
14 AL 116-W at p. 4.
15 SCE 01 at p. 2:3 – 7.
16 A.20-04-010 at p. 2.
17 A.20-04-010 at p. 2.
2. **Scope of work proposed for CWPAMA cost recording**

SCE’s proposal to map the entire Catalina Water system includes locating and assessing above-ground, partially buried, and buried pipelines; mapping with latitude/longitude; and analyzing the length, diameter, and composition of the pipeline materials. Additionally, SCE’s project includes the following:

- Compiling existing physical and electronic records;
- Performing desktop drawing review by geographic region;
- Identifying the location and accessibility;
- Performing field assessment for pipeline areas with missing or incomplete records and/or areas that cannot be verified through desktop drawing review;
- Completing field sampling of distribution infrastructure and decommissioned pipe (including surrounding soils);
- Coordinating biological/archaeological surveys and monitoring in environmentally sensitive areas;
- Notifying agencies and preparing permit application package for potholing or other intrusive methods as needed;
- Developing representative map/diagram indicating in-service pipeline and decommissioned pipe locations and categories, material composition, and accessibility (above-ground, partially buried, buried);
- Developing a report summarizing findings, with an appendix of supporting documentation; and,
- Preparing permit applications with the responsible permitting agency for assessment, removal and disposal work, if determined to be necessary.

3. **Project Justification**

SCE states that it must complete the system mapping and assessment in order to comply with environmental regulations concerning removal and disposal of

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decommissioned pipe containing hazardous materials. SCE claims that the assessment will also position SCE to better prioritize and estimate subsequent in-service pipeline replacement activities and decommissioned pipe removal/disposal activities.

4. Proposed Customer Benefits of the Assessment
SCE claims that its customers will benefit from this project because the Catalina Water Utility currently does not have a single record that fully maps and characterizes the in-service pipelines or decommissioned pipe on the island. According to SCE, the lack of such information makes it difficult to physically locate pipelines and decommissioned pipe for testing and assessment for the presence of hazardous materials. SCE claims that by completing the assessment, SCE can use the results in identifying in-service pipelines that may need to be replaced and decommissioned pipe that will need to be removed and properly disposed of. SCE does not address whether there is any benefit to customers for recording and tracking the proposed costs in a memo account.

5. Estimate of Costs Tracked in Proposed Memo Account
SCE’s proposed cost estimate, to map and perform a system-wide assessment of the Catalina Water system, is $900,000. These costs, if reasonably accurate and determined to be appropriate when SCE seeks authority to recover the costs are substantial in that they represent approximately 22% of the Catalina Water Utility’s current annual revenue requirement of $4.13 million. SCE does not indicate whether the proposed costs would be recovered as an expensed cost or as a capital cost.

\[^{12}\text{A.20-04-010 at p. 8.}\]
\[^{20}\text{Ibid.}\]
\[^{21}\text{Ibid. at p. 7.}\]
\[^{22}\text{Ibid.}\]
\[^{23}\text{Ibid.}\]
\[^{24}\text{SCE 01 at p. 10:17 – 19.}\]
\[^{25}\text{D.14-10-048, Appendix A.}\]
B. Cal Advocates’ Review and Recommendations

Cal Advocates takes no position here on SCE’s proposed project to perform an assessment of its in-service and decommissioned infrastructure and pipelines, or its future plans to remove and dispose of decommissioned contaminated materials. However, SCE’s requested CWPAMA is unnecessary, reduces discipline to control costs, and fails to meet the criteria for establishing a new memorandum account. The Commission should deny SCE’s request with prejudice.

A Memorandum Account is Not Necessary to Recover Capital Costs

SCE’s testimony is misleading when asserting that, “Absent a memorandum account, utilities would be precluded from recovering unanticipated, though reasonably incurred costs due to the retroactive ratemaking prohibition.” Although an unanticipated non-recurring expensed cost might be precluded from recovery due to retroactive ratemaking, unanticipated capital costs are frequently incurred and recovered prospectively as rate base additions without the benefit of any memorandum account.

Unlike expensed costs appearing on a utility’s income sheet, capital costs are “expected to produce an economic benefit beyond the current year” and appear on a utility’s balance sheet. The cost of a system-wide assessment of infrastructure such as the one SCE proposes to track in its requested CWPAMA would certainly produce economic benefit beyond just one year. Nowhere in its application or testimony does SCE identify the costs that it proposes to track in the CWPAMA as “expenses” or items likely to be expensed. In fact, SCE testimony acknowledges that the assessment’s updated map data and improved facilities documentation will support the management of its capital assets and environmental remediation efforts. Unless SCE can establish its inability to capitalize the costs of performing the assessment, these capital costs can be presented to

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26 SCE 01 at p. 6:21-23.
27 https://corporatefinanceinstitute.com/resources/knowledge/accounting/capitalized-cost/
28 SCE 01 at p. 11:19-20.
29 Ibid. at p. 10:13-14.
the Commission for recovery (without a memorandum account) as a rate base addition following a reasonableness and prudence review.

**A Memorandum Account Reduces the Discipline to Control Costs**

SCE provides an estimate of the type and amount of costs that would be tracked in its requested CWPAMA.\(^{30}\) However, there is no cap or maximum limit proposed by SCE for costs to be tracked and recovered from the account. Despite stating in testimony that there is no presumption of recovery with memorandum accounts, a possibly more candid yet contradictory statement is provided by SCE in the preceding sentence of testimony; “SCE should not be disincentivized to respond to the present issue in a timely manner due to the uncertainty of cost recovery.”\(^ {31}\)

To the extent that project costs can be capitalized and presented for recovery as rate base additions, following a reasonableness review, it is precisely the uncertainty of cost recovery that fosters discipline to control costs and engage in only reasonable and prudent activities. Regardless of any presumption of cost recovery articulated by the Commission in authorizing memorandum accounts, it is clear that SCE considers its requested memorandum account would reduce the uncertainty of cost recovery. The Commission should not reduce the discipline to control costs by granting SCE’s request.

**1. Commission Criteria for Establishing Memorandum Accounts**

Under SP U-27, the Commission requires that requests for new memorandum accounts must address certain criteria:

a. The expense is caused by an event of an exceptional nature that is not under the utility’s control;

b. The expense cannot have been reasonably foreseen in the utility’s last general rate case and will occur before the utility’s next scheduled rate case;

\(^{30}\) *Ibid.* at p. 11, Table 3-1.

c. The expense is of a substantial nature as to the amount of money involved when any offsetting costs decreases are taken into account; and
d. The ratepayers will benefit by the memo account treatment.  

C. Review of SCE’s Request for Compliance with SP U-27 Criteria

While SCE’s application addressed the above criteria, it only meets item C., in that the proposed estimated cost is substantial in nature compared to SCE’s current revenue requirement. SCE fails to show that it meets the remaining criteria, items a., b., and d., and fails to establish that the costs are actually “expenses” that cannot be capitalized and recovered as rate base additions after being incurred and reviewed for reasonableness. Similar to the Water Division’s recommendation in AL 116-W, the Commission should deny the request because it does not fully meet the criteria of SP U-27. Below, Cal Advocates will address the deficiencies in SCE’s request.

1. Are the mapping and assessment expenses under SCE’s proposed CWPAMA caused by an event of an exceptional nature that is not under the utility’s control?

SCE’s application does not support the assertion that its need for a memo account to track system-wide assessment and mapping costs is due an event outside the utility’s control. Since the 1970’s, SCE has known, or should reasonably have known, that pipe containing PCBs may be in the Catalina Water system, having installed the Million Gallon Tank and Two Harbors Pipeline using coal tar-lined components in 1967. SCE notes that coal-tar lined and/or wrapped pipe was the industry standard prior to TSCA, so the need for replacement and disposal of this product in accordance with EPA regulations is unexceptional. By SCE’s own account, when it has replaced various components of

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32 SP U-27-W, based on criteria established in Decision (D.) 08-03-020 (March 13, 2008).
33 SCE 01 at p. 2:1-9.
34 Id., p. 2:10-15.
the Catalina Water system since TSCA took effect in 1976, it has done so using non-PCB
components.\footnote{A.20-04-010, Section IV, Factual Background at p. 5.}

SCE has control over meeting its obligations to maintain up-to-date maps and
records of the Catalina Water system. General Order 103-A, Section VII,4. A., states that
all water and wastewater systems utilities are required to have on file at their principal or
local office plans, maps, drawings, or other records of all system facilities. “The plans,
maps, drawings or other records shall be clear and legible. At a minimum these records
will include:

\begin{itemize}
\item[a)] Location of all pumping stations, diversion works, water or sewer
treatment plants, sources of supply,
\item[b)] Location, size and material of each service line,
\item[c)] A schematic drawing or map of all pumping stations, water or
wastewater treatment plants to show the size and location of all major
equipment, pipelines, connections, valves and other equipment and
\item[d)] The date of construction of all plant.”
\end{itemize}

General Order 103-A requires that the water and wastewater system plans, maps,
drawings, and other records shall be updated as significant changes occur and maintained
until replaced or suspended by updated plans or drawings.\footnote{GO 103-A. Section B. (1)}
Maintaining system plans, maps, schematic drawings and records is expected, not exceptional.

Although SCE did not build the Catalina water system from the ground up, it has
owned and operated the system for almost 60 years.\footnote{A.20-04-010 at p. 4.}
Yet, SCE states in its application
that it does not have comprehensive maps and records fully characterizing the distribution
infrastructure and decommissioned pipe on the island.\footnote{Ibid. at p. 2.}
The Catalina Water system is a
small Class C water utility; however, the system is owned and operated by one of the
largest electric utilities in the country with a market capitalization of over $20 billion.
SCE provides no reasonable explanation for why it has not previously completed an adequate assessment and mapping of the Catalina Water system, given the GO-103A requirements to maintain updated plant records, maps, and documents.  

2. Could SCE have reasonably foreseen expenses in its last Catalina Water Utility GRC, and will expenses occur before the next scheduled GRC? 

The costs associated with performing mapping and assessment of SCE’s pipelines and infrastructure could have been addressed previously in SCE’s GRC filings. The Catalina water system was acquired by SCE in 1962. In 1967, SCE installed the million-gallon tank (MGT) and the Two Harbors Pipeline. Since acquiring the system SCE has built new infrastructure and replaced other infrastructure that had reached the end of its useful life. According to SCE, after PCBs were banned in 1976, SCE has replaced various components of the system with non-PCB components. SCE has had numerous opportunities to assess its plant infrastructure, update its records, maps, and drawings as required by GO 103-A. Costs to perform such an assessment could have been included in prior GRC proceedings. SCE may also include capital costs to update its records, maps, and drawings in its upcoming GRC. 

3. Are proposed CWPAMA expenses of a substantial nature? 

SCE estimates that performing a full assessment of its Catalina water system will cost $900,000; approximately 22% of the current revenue requirement of $4.13 million for the Catalina water utility. SCE states that the estimate includes $600,000 for engineering costs, $200,000 for environmental costs, and a $100,000 contingency amount. The total amount is substantial in comparison to SCE’s revenue requirement,
but the application and testimony do not explain how SCE reached these estimates, and it is unclear how or whether the proposed scope of work and key activities for the assessment and mapping project fits within the cost estimates.\textsuperscript{44} The majority of the estimated costs are for engineering, $600,000 with an additional $100,000 in contingency costs. Such costs can be capitalized if the resulting project has an ongoing benefit beyond one year.

While the total estimated proposed costs may be substantial, as presented in A.20-04-010, SCE’s request fails to meet all the other requirements of SP U-27. As discussed above, SCE has not shown that the project estimated costs are exceptional in nature, beyond the utility’s control, or unforeseeable. The cost of the project alone is not adequate to justify a memorandum account under SP U-27. SCE also fails to demonstrate that memo account treatment of the assessment and mapping costs will benefit ratepayers.

4. Will authorization of the CWPAMA have ratepayer benefit?

SCE claims that customers will benefit from SCE’s proposed assessment because SCE does not currently have a single record mapping and characterizing the in-service pipelines in the system or decommissioned pipe on the island, making it difficult to physically locate pipelines and decommissioned pipe for testing and assessment for the presence of hazardous materials.\textsuperscript{45} This may be the case; however, the Commission decision establishing the SP U-27 criteria makes clear that the ratepayer benefit requirement involves a showing that ratepayers will benefit by the memo account treatment of the costs, not merely the source of the costs. Whether or to what extent the project itself would have ratepayer benefit is a separate issue beyond the scope of this application.

\textsuperscript{44} SCE 01 at pp. 5-7.

\textsuperscript{45} A.20-04-010, Section V, paragraph B. Customer Benefits at p. 7.
SCE does not explain how memo account treatment of the assessment and mapping costs will benefit ratepayers. Without this showing, the potential risks to ratepayers of authorizing a memo account are greater. If authorized, a memo account reduces transparency to customers’ water rates if it is amortized outside the GRC process, resulting in a surcharge added to customer’s bills. Whenever possible, proposing expenditures such as SCE contemplates in this application in the GRC process, rather than for memo account treatment, gives ratepayers an opportunity to review the filing as well as participate and intervene.

D. Appropriate Effective Date if the Commission Authorizes the CWPAMA

SCE requests that the effective date of the CWPAMA be the date that it filed AL 116-W, January 28, 2020, if the Commission authorizes the memorandum account.\textsuperscript{46} Based on Cal Advocates review of the documents and correspondence pertaining to AL 116-W, Water Division’s suspension of AL 116-W, and SCE’s subsequent filing of the application, Cal Advocates recommends that the appropriate effective date of the CWPAMA, if authorized, should be the filing date of the application, April 13, 2020.

In AL 116-W, SCE requested a different memo account (the CWUSHMA) with costs covering a much larger scope that included remediation and removal as well as hazardous material disposal costs.\textsuperscript{47} Water Division advised SCE that the request in AL 116-W failed to meet the criteria of SP U-27 and that SCE could “file a supplemental Advice Letter to modify and support its request in order to meet the criteria for establishing a memorandum account required by SP U-27.”\textsuperscript{48} As stated previously, in an email dated February 26, 2020, Water Division suggested that SCE could include the request for the memorandum account and environmental remediation project in its GRC

\textsuperscript{46} A.20-04-010 at p. 4.

\textsuperscript{47} AL 116-W at p. 4.

\textsuperscript{48} Water Division Advice Letter Suspension Notice, dated February 26, 2020.
application later in 2020. However, SCE submitted the present application instead of correcting deficiencies in AL 116-W or waiting for its GRC to submit its request. SCE states that it significantly narrowed the scope of the AL 116-W memo account for its application. However, review of the two scopes indicates that the activities proposed in the application for CWPAMA costs were not included in the earlier AL 116-W proposed scope for CWUSHMA. The application scope cannot properly be called a narrower version of the AL 116-W proposal; it describes a separate project. The January 28, 2020 effective date might have been appropriate had SCE revised AL 116-W and resubmitted it for additional review by Water Division. However, SCE filed a separate application for a different memorandum account two months after AL 116-W was suspended. If the Commission authorizes the CWPAMA, the effective date should be no earlier than April 13, 2020.

E. **CONCLUSION**

SCE’s request for the CWPAMA should be denied because it is unnecessary, reduces the incentive for SCE to control costs, and does not meet the criteria of the Commission’s guidelines for establishing memorandum accounts as required in SP U-27. SCE provided no evidence that the matter is caused by an event of an exceptional nature or that the event is outside SCE’s control. SCE is already required by GO 103-A to update and maintain system maps and records; therefore, the costs of adequate mapping and assessment of the pipelines and infrastructure on Catalina Island is entirely within SCE’s control and could have been included in previous GRCs and may still be included in a future GRC.

SCE’s failure to maintain up-to-date records, maps, and drawings as required by GO 103-A, and its failure to support its request to establish a new memo account should result in denial of this request. SCE has not demonstrated any way in which memo account treatment of the proposed costs would benefit ratepayers. The activities and costs described can be more appropriately addressed in SCE’s next GRC for the Catalina

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49 SCE 01 at p. 13:21 – 24.
Water utility. Establishing a memo account to perform the desired assessment now is inconsistent with SP U-27 and unnecessary.
APPENDIX A

QUALIFICATIONS OF WITNESSES
QUALIFICATIONS AND STATEMENT
OF
PATRICIA ESULE

Q.1. Please state your name, business address, and position with the California Public Utilities Commission (Commission).

A.1. My name is Patricia Esule. My business address is 320 W. 4th Street, Ste. 500, Los Angeles, CA 90013. I am a Public Utility Regulatory Analyst (“PURA IV”).

Q.2. Please summarize your education background.

A.2. I received an Associate Degree in Liberal Arts from College of the Sequoias in Visalia, California in 1979. I attended NARUC Rate School in 2004. I have also completed Utility Finance & Accounting for Non-Professionals course in 2007.

Q.3. Briefly describe your professional experience.

A.3. I have been employed by the Public Advocates Office - Water Branch since May 2003. During my employment in the Public Advocates Office, I have provided testimony in many GRCs as an analyst/witness on capital projects, operational and administrative expenses, low-income programs and water conservation. Additionally, I have performed the duties of project lead for the Great Oaks Water Company GRC filed in 2009, and most recently the application filed in May 2017 by California Water Service Company for Certificate of Public Convenience and Necessity (“CPCN”) required to create a new Travis district. I have provided analyses and recommendations on various advice letter filings, including a joint application of the 8 Class A water utilities concerning the California Consumer Privacy Act and a request filed by Suburban Water Corporation for an Asbestos Litigation memorandum account. My previous professional experience includes the position of Associate Transportation Representative in the Commission’s Consumer Protection and Enforcement Branch (“CPED”), and Supervisor in the Consumer Affairs Branch. Prior to coming to the Commission, I was employed as a Sales Representative and a Billing Specialist at AT&T Communications.

Q.4. What is your responsibility in this proceeding SCE’s Catalina water service A. 20-04-010?

A.4. I provide California Public Advocates’ testimony on SCE’s request for memorandum account to track and record costs related to performing a complete assessment of its in-service and decommissioned above and below-ground pipeline.
Q.5. Does this conclude your prepared direct testimony?
A.5. Yes, it does.
ATTACHMENTS

A. Advice Letter 116-W
B. February 26, 2020 Email from Water Division to SCE
C. Suspension Notice
D. SCE Letter to Withdraw AL 116-W