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Commissioner	:	<u>Darcie L. Houck</u>
Administrative Law Judge	:	<u>Minh LeQuang</u>
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Witness		



PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

REPORT ON
SCADA, NEW POSITION, CUSTOMER SERVICE, WATER
QUALITY, SPECIAL REQUEST #1, AND ESJ ACTION PLAN

PUBLIC

Application 25-01-001
(San Gabriel Valley Water Company)

Los Angeles, California
July 25, 2025

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CHAPTER 1 SUPERVISORY CONTROL AND DATA ACQUISITION

I. INTRODUCTION

This chapter covers SGVWC's request for upgrading its Supervisory Control and Data Acquisition (SCADA) systems in the Los Angeles County (LAC or LA) and Fontana Water Company (Fontana or FWC) divisions.

In a competitive market, competition incentivizes businesses to provide service at the lowest possible cost for its consumers. However, in a natural monopolistic setting like the utilities industry, a utility has no such incentive. Therefore, when evaluating a utility's proposed costs, the Commission must act as a substitute for competition by considering not just the utility's ability to provide safe and reliable water service, but also whether the utility provides this service at the lowest possible cost to ratepayers. This evaluation necessitates that a utility's proposed costs be transparent, complete, and reasonable.

Therefore, Cal Advocates reviewed SGVWC's proposed SCADA budget for completeness, accuracy, reasonableness, and whether SGVWC considered multiple vendors to ensure that ratepayers pay for the most cost-effective option, and whether SGVWC considered the potential negative impact of early retirement of assets in its proposed budget.

II. SUMMARY OF RECOMMENDATIONS

Summary Table 1-1 below compares SGVWC's forecasted budget of \$13.4 million for SCADA for the years 2025-2028, and Cal Advocates' recommendation. Cal Advocates' recommendation is based on SGVWC's poor cost estimate, the lack of a competitive bidding and the premature retirement of recently installed assets in SGVWC's proposed SCADA master plan. Given these deficiencies, the Commission should not authorize SGVWC to include the cost of SGVWC's SCADA proposed budget in rates for the years covered in this GRC.

Table 1-1: Summary of Recommendation (2025-2028) ¹

Items	Cal Adv Recommendations	SGVWC Requests	SGVWC > Cal Adv
SCADA (LA Division)	\$0	\$7,205,000	(\$7,205,000)
SCADA (Fontana Division)	\$0	\$6,170,000	(\$6,170,000)
Total	\$0	\$13,375,000	(\$13,375,000)

III. ANALYSIS

SGVWC requests to replace SCADA components beginning in year 2025 across its plant sites in the LA and Fontana divisions. In its application, SGVWC provides a technical memorandum detailing SGVWC's proposed budget for its SCADA Master Plan. The SCADA Master Plan primarily proposes <<BEGIN CONFIDENTIAL>>

<<END CONFIDENTIAL>> SGVWC plans to replace its Tesco brand PLCs with new PLCs produced by Rockwell Automation.⁴ SGVWC has yet to select a vendor to replace its OITs.⁵ However, SGVWC utilizes a poorly defined and incomplete cost estimate, fails to conduct a competitive bidding process for key SCADA components, and does not consider the negative impact of the early retirement of recently installed SCADA assets.

A. SCADA Poor Cost Estimates

When a utility proposes any significant plant asset construction or upgrade, it should provide an accurate, detailed, and transparent estimate of the costs. The utility

¹ SGVWC EXHIBIT SG-6 (Swift) PUBLIC VERSION.pdf, p. 28.

² SGVWC EXHIBIT SG-6 Swift CONFIDENTIAL Attachment L, at 16 (pdf, p. 25).

³ SGVWC EXHIBIT SG-6 Swift CONFIDENTIAL Attachment L, at 7 to 8 (pdf, pp. 16 to 17).

⁴ Attachment 1-2: Response to TGE-014, at 9.

⁵ Attachment 1-2: Response to TGE-014, at 9.

1 should also demonstrate whether its proposal provides the purported benefits at a
2 reasonable cost to ratepayers. In other words, the utility should provide safe and reliable
3 service at the lowest possible cost to ratepayers.

4 SGVWC's proposed SCADA budget fails to provide an accurate, detailed, and
5 transparent cost estimate. Rather than providing a detailed and well-supported estimate,
6 SGVWC instead relies on a cost estimate classification described by the Association for
7 the Advancement of Cost Engineering (AACE) as having the least detail and preparation
8 effort. Additionally, SGVWC arbitrarily adds a <<BEGIN CONFIDENTIAL>> [REDACTED]
9 [REDACTED] <<END CONFIDENTIAL>> to its poorly defined cost estimate.⁶

10 Lastly, SGVWC states that it has yet to select an OIT vendor, further demonstrating that
11 its cost estimate is incomplete.⁷

12 **1. SGVWC Utilizes an Incomplete and Inaccurate**
13 **Cost Estimate Classification for its SCADA**
14 **Proposal**

15 SGVWC relies on an incomplete and overinflated budget estimate for its proposed
16 SCADA budget. SGVWC's SCADA technical memorandum states <<BEGIN
17 CONFIDENTIAL>> [REDACTED]
18 [REDACTED]
19 [REDACTED] <<END CONFIDENTIAL>> The AACE International defines a Class 5
20 cost estimate as a preliminary "concept screening" with the lowest levels of project
21 definition and the least amount of preparation effort.⁸ Specifically, a Class 5 cost
22 estimate corresponds to a "0% to 2%" level of project definition with minimal levels of
23 engineering and design complete.¹⁰ The AACE states that "Class 5 estimates, due to the
24 requirements of end use, may be prepared within a very limited amount of time and with

⁶ SGVWC EXHIBIT SG-6 Swift CONFIDENTIAL Attachment L, at 29 (pdf p. 38).

⁷ Attachment 1-2: Response to TGE-014, at page 9.

⁸ SGVWC EXHIBIT SG-6 Swift CONFIDENTIAL Attachment L, at 29 (pdf p. 38).

⁹ Attachment 1-3: AACE International Recommended Practice No. 18R-97, at 2.

¹⁰ Attachment 1-3: AACE International Recommended Practice No. 18R-97, at 3.

1 little effort expended – sometimes requiring less than an hour to prepare.” The AACE
2 further describes a Class 5 estimate as “generally prepared based on very limited
3 information, and subsequently have wide accuracy ranges.”¹¹

4 Given this lack of detail and reliability, SGVWC’s use of a <<BEGIN
5 CONFIDENTIAL>> [REDACTED] <<END CONFIDENTIAL>> does not provide
6 the level of accuracy or transparency needed to justify ratepayer funding for its proposed
7 SCADA upgrades.

8 2. SGVWC Overinflates Its SCADA Cost Estimate

9 SGVWC’s further inflates its SCADA budget estimate by including a <<BEGIN
10 CONFIDENTIAL>> [REDACTED] <<END CONFIDENTIAL>> of additional
11 cost.¹² This additional cost demonstrates that SGVWC’s cost estimate lacks accuracy
12 and detail and does not constitute an accurate and detailed budget. SGVWC does not
13 explain the reasoning for including this cost in its technical memorandum, nor does it
14 identify specific risks or uncertainties that would warrant such an inflated buffer. This
15 lack of transparency undermines the credibility of the proposed budget and further
16 supports the conclusion that it does not represent a reasonable basis for rate recovery.

17 3. No OIT Vendor Selected

18 SGVWC’s technical memorandum recommends issuing <<BEGIN
19 CONFIDENTIAL>> [REDACTED]
20 [REDACTED]
21 [REDACTED] <<END CONFIDENTIAL>> However,
22 SGVWC states that it has yet to issue an RFI to potential OIT vendors as of May 2025.¹⁴
23 In response to a Cal Advocates’ data request, SGVWC states that it would not issue an

¹¹ Ibid.

¹² SGVWC EXHIBIT SG-6 Swift CONFIDENTIAL Attachment L, at 29 (pd, p. 38).

¹³ SGVWC EXHIBIT SG-6 Swift CONFIDENTIAL Attachment L, at 16 (pdf, p. 25).

¹⁴ Attachment 1-2: Response to TGE-014, at 9.

1 RFI for OITs until it finalizes drafting its specifications for the Rockwell PLCs.¹⁵
2 SGVWC did not provide a timeline for the completion of this RFI for OIT vendors. The
3 fact that SGVWC has not issued an RFI for OIT vendors demonstrates that its proposed
4 SCADA budget remains both highly speculative and incomplete. The final vendor
5 selection, when known, may significantly impact and alter SGVWC's SCADA project
6 scope and cost estimates. The Commission should not require ratepayers to pay for
7 SCADA upgrades based on an unfinished and uncertain estimate of the final costs.

8 **B. Lack of Competitive Bidding**

9 SGVWC conducted an RFI only for PLC vendors and its consultant, West Yost,
10 compiled the results in an additional technical memorandum dated September 2023.¹⁶

11 The RFI included questions to vendors to determine key product characteristics and
12 capabilities, including <<BEGIN CONFIDENTIAL>> [REDACTED]

13 [REDACTED]

14 [REDACTED] <<END

15 CONFIDENTIAL>>Based on the results of the RFI, SGVWC states that it selected
16 Rockwell Automation from a pool of five finalists to supply PLCs for its SCADA
17 systems in the LA and Fontana divisions.¹⁸

18 However, SGVWC's assessment makes no consideration of comparative costs
19 between the five finalists. A complete evaluation of vendors should consider not only
20 technical capabilities and qualitative factors, but also whether the selected vendor
21 provides the best value at the lowest possible cost to ratepayers. By failing to incorporate
22 cost comparisons into its selection process, SGVWC neglects a critical component of
23 prudent utility procurement and fails to consider the most cost-effective option for
24 ratepayers.

¹⁵ Attachment 1-4: Response to TGE-013 Response, at 6.

¹⁶ Attachment 1-4: Response to TGE-013, Response No. 1a.ii., at 6.

¹⁷ SGVWC EXHIBIT SG-6 Swift CONFIDENTIAL Attachment L, at 16 (pdf, p. 25).

¹⁸ Attachment 1-2: Response to TGE-014, at 9.

1 **1. SGVWC Did Not Conduct a Cost Comparison of**
2 **Vendors**

3 When asked whether it has conducted a Request for Proposal (RFP) or any form of
4 a competitive bidding among the five vendor finalists, SGVWC stated that it has not done
5 so.¹⁹ Even though another PLC vendor finalist, Schneider Electric, scored similarly to
6 Rockwell Automation under the RFI evaluation criteria for PLCs, ²⁰ SGVWC selected
7 Rockwell Automation without conducting an RFP or performing a cost comparison
8 between vendors. Without a comparison of the actual costs between potential vendors,
9 SGVWC fails to assess whether its selection is the most cost-effective option for
10 ratepayers.

11 **C. Early Retirement of Assets**

12 SGVWC's SCADA proposal does not account for the timing of retirement and
13 replacement of several assets across its plant sites. Usually, when a utility constructs a
14 plant facility or installs equipment, it does so with the expectation that the utility will use
15 the plant or equipment until it reaches the end of its useful service life. However,
16 SGVWC's SCADA proposal would replace several recently installed PLCs across
17 several plant sites. For example, SGVWC documents show that it plans to replace 86
18 PLCs in the LA division.²¹ Of these, 9 PLCs in the LA division were installed as recently
19 as 2020.²² SGVWC estimates the cost of replacing these PLCs to be \$20,000 for each
20 PLC.²³ By comparison, most of the PLCs that SGVWC proposes to replace were
21 installed in 2008.²⁴ SGVWC's proposal would replace these recently installed PLCs well
22 before the end of their expected life. SGVWC's testimony makes no mention how early

¹⁹ Attachment 1-2: Response to TGE-014, at 9.

²⁰ Attachment 1-5: TGE-013 ATTACHMENT a.ii.pdf PLC Hardware Technical Memorandum, at 7 and 9.

²¹ Attachment 1-6: SGVWC PLC Los Angeles County Division REVISED TGE-013 b.ii.xls

²² Ibid.

²³ Ibid.

²⁴ Ibid.

1 retirement of these assets would negatively affect SGVWC's rate base. Under the current
2 ratemaking methodology, any early retirement creates a disadvantage for the ratepayers
3 as the associated net book value remains in the ratebase forever after the early retirement
4 adjustment is made by a removal of total historic cost of capital asset from both the Plant-
5 in-Service account and depreciation reserve account instead of only removing the actual
6 accumulated depreciation amount from the depreciation reserve account. This accounting
7 treatment effectively leaves unde depreciated value in rate base, causing ratepayers to
8 continue paying for assets that are no longer in use. Without an adjustment or
9 explanation, SGVWC's retirement of recently installed PLCs would shift the financial
10 burden of premature retirement onto ratepayers.

11 **IV. CONCLUSION**

12 The Commission should not allow SGVWC to include its proposed SCADA
13 budget of \$13.4 million in rates over the period 2025-2028 covered in this GRC, because
14 SGVWC's cost estimates are inaccurate, incomplete, and lack a competitive bidding
15 process. In addition, SGVWC failed to account for the negative impact of early
16 retirement of several existing SCADA assets.

1

LIST OF ATTACHMENTS FOR CHAPTER 1

#	Attachment #	Description
1	1-1	Qualifications of Witness
2	1-2	Response to TGE-014
3	1-3	AACE International Recommended Practice No. 18R-97
4	1-4	Response to TGE-013
5	1-5	TGE-013 ATTACHMENT a.ii.pdf PLC Hardware Technical Memorandum
6	1-6	SGVWC PLC Los Angeles County Division REVISED TGE-013 b.ii.xls

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CHAPTER 2 NEW POSITIONS

I. INTRODUCTION

This chapter covers proposed salaries and benefits for new requested positions in the LA and Fontana divisions, which include the following eight positions: two SCADA Technicians, two SCADA electricians, one Facilities Maintenance Supervisor, one Water Resources Project Manager, one Water Quality Specialist, and one Water Resources Analyst.

In a competitive business environment, competition incentivizes businesses to provide service at the lowest possible cost to consumers. In the natural monopoly utilities business environment, no such competition exists to compel utilities to keep costs low. Therefore, the Commission serves an important role as a substitute for competition to ensure that ratepayers receive safe and reliable water service at affordable rates. Cal Advocates evaluates SGVWC's proposed costs for eight new positions based on whether SGVWC demonstrated with reasonable evidence the necessity of the position in addressing a crucial need for SGVWC's operations, and whether the requested position would provide greater benefits to ratepayers in lieu of reasonable cost-effective alternatives.

II. SUMMARY OF RECOMMENDATIONS

The Commission should not authorize SGVWC to include these eight positions in rates for this GRC due to SGVWC's insufficient supporting evidence proving their necessity and value to ratepayers. Summary Table 2-1 shows Cal Advocates' adjustment to SGVWC's forecasted budget for the eight new positions for Test Year (TY) 2026. SGVWC's forecasted budget includes total projected salaries, payroll taxes, and 401 (k) and insurance benefits for TY 2026. The Commission should not allow SGVWC to include the cost of these positions in rates for this GRC. This reduces the total forecast for SGVWC's 2026 payroll budget by approximately \$ 1.3 million.

Table 2-1: Summary of Recommendation²⁵

Items	Cal Adv Recommendations	SGVWC Requests	SGVWC > Cal Adv
SCADA Electrician (LA)	\$0	\$140,467	(\$140,467)
SCADA Electrician (Fontana)	\$0	\$153,210	(\$153,210)
SCADA Technician (LA)	\$0	\$146,839	(\$146,839)
SCADA Technician (Fontana)	\$0	\$146,839	(\$146,839)
Facilities Maintenance Supervisor (LA)	\$0	\$146,839	(\$146,839)
Water Resources Project Manager (LA)	\$0	\$303,458	(\$303,458)
Water Quality Specialist (LA)	\$0	\$140,467	(\$140,467)
Water Resources Analyst (LA)	\$0	\$140,467	(\$140,467)
Total	\$0	\$1,318,586	(\$1,318,586)

III. ANALYSIS

SGVWC requests eight new positions in its LA and Fontana divisions. SGVWC lacks sufficient supporting evidence for the positions' necessity and value to ratepayers as discussed below.

A. SCADA Electricians and Technicians

SGVWC requests two new SCADA electricians and two new SCADA technicians, one electrician and one technician for each of the LA and Fontana divisions. SGVWC justifies the two electricians and two technicians as supporting its larger request for SCADA upgrades. As discussed in Chapter 1 that SGVWC's SCADA budget estimates are incomplete, inaccurate, and do not provide reasonable cost to ratepayers,

²⁵ SGVWC Workpaper GRCWorkpapers – 2025 (FORMAL APPLICATION), Worksheet Tab PR4, Lines 202, 208, 214, 283, 333, 334, 481, and 482.

1 the Commission should not require ratepayer funding of SGVWC's SCADA request.
2 Therefore, the Commission should not allow the cost of SCADA electricians and
3 technicians to be included in rates as they are no longer justified without these SCADA
4 upgrades. This removes approximately \$587,355 from SGVWC's forecast for TY 2026.

5 **B. Facilities Maintenance Supervisor**

6 The Commission should not allow the cost of the LA division Facilities
7 Maintenance Supervisor in rates. This removes approximately \$146,839 from SGVWC's
8 TY 2026 forecast.

9 **1. SGVWC Intentionally Vacated Previous Facilities**
10 **Maintenance Supervisor Position**

11 SGVWC claims a Facilities Maintenance Supervisor in the LA division's
12 Facilities Maintenance department is needed to fulfill a crucial vacancy. SGVWC
13 previously vacated this Facilities Maintenance Supervisor position in June 2024, by
14 converting the then LA division Facilities Maintenance Supervisor to the LA division
15 Facilities Maintenance Superintendent position.²⁶ SGVWC also states that the LA
16 Facilities Department never had a Superintendent before SGVWC appointed the then
17 Supervisor to the position.²⁷ SGVWC notes that the duties and job responsibilities of the
18 newly created Superintendent position were previously supported by the LA division's
19 Operations Manager in tandem with the previous Supervisor.²⁸

20 SGVWC claims that the now vacant Facilities Maintenance Supervisor position
21 results in a managerial deficiency. SGVWC claims that having both a Superintendent and
22 a Supervisor is a necessary supervisory structure. While other SGVWC departments have
23 a dual Supervisor and Superintendent structure, this is not a sufficient reason as SGVWC
24 does not demonstrate the necessity of such a managerial structure for the LA division's
25 Facilities Maintenance Department. For example, SGVWC does not provide sufficient

²⁶ Attachment 2-1: CONFIDENTIAL Response to TGE-010, at 3 to 4.

²⁷ SGVWC EXHIBIT SG-7 (Zielke).pdf, Attachment Q, at pdf, p. 436.

²⁸ Attachment 2-1: Response to TGE-010, at 5.

1 evidence of operational deficiencies, performance issues, or service delays that would
2 necessitate a dual supervisory structure. The mere fact that other departments have a
3 similar dual supervisory structure is not sufficient rationale for including this position in
4 rates. In fact, SGVWC should prepare in its next GRC to explain why a dual supervisory
5 structure is necessary for any department.

6 **2. SGVWC has Well-Maintained Facilities**

7 During its February 2025 site visit, Cal Advocates observed that the LA division's
8 various plant facilities appear to be clean, orderly, and well-maintained. Pictures provided
9 to Cal Advocates by SGVWC during the site visit demonstrate that SGVWC's facilities
10 are well-maintained and not in distress.²⁹ This observation is further supported by the
11 Department of Drinking Water's (DDW) recent Sanitary Survey findings for SGVWC's
12 water systems in the LA division. For example, in addition to reviewing SGVWC's
13 adherence to applicable water quality standards and testing practices at its sites and
14 facilities, DDW's Sanitary Survey also covers various aspects of plant facilities and
15 maintenance that would fall under the purview of the Facilities Maintenance Department,
16 including cleaning and maintenance of water storage tanks and general site conditions.
17 DDW describes SGVWC's facilities in the LA division as being clean and well-
18 maintained.³⁰ Photographic evidence and DDW's assessment indicate that SGVWC's
19 facilities are well-maintained, with no apparent evidence that its LA Facilities
20 Maintenance Department is understaffed or struggling to meet its responsibilities.

21 **C. Water Resources Project Manager**

22 As of SGVWC's current GRC application, SGVWC already filled this requested
23 new Water Resources Project Manager position by appointing one of its existing
24 employees on June 17, 2024. This employee previously held several other positions
25 within SGVWC as well.

²⁹ Attachment 2-2: LA Division Site Visit Photos.

³⁰ SGVWC EXHIBIT SG-9 (Fealy), ATTACHMENT J, at pdf pp. 2044 to 2045.

1 SGVWC’s testimony and data request responses fail to demonstrate the necessity
2 and ratepayer benefits of the Water Resources Project Manager position. As discussed
3 below, SGVWC does not provide sufficient evidence that this position benefits ratepayers
4 and addresses any purported deficiencies in SGVWC water operations. The Commission
5 should not authorize SGVWC’s request to include the cost of the Water Resources
6 Project Manager position in rates for this GRC. This disallowance removes
7 approximately \$303,458 from SGVWC’s forecast for TY 2026.

8 **1. SGVWC Does Not Demonstrate the Necessity of the**
9 **Water Resources Project Manager**

10 SGVWC does not provide satisfactory documentation that supports their request
11 for the Water Resources Project Manager position. When Cal Advocates requested that
12 SGVWC provide a work study or other documentation demonstrating the benefits and
13 necessity of the new position, SGVWC did not provide a work study, but instead
14 provided a document showing a salary comparison of before and after the hiring of
15 several requested new positions.^{31 32} However, a salary comparison does not provide
16 sufficient evidence to demonstrate why the new position is necessary or justified.

17 Cal Advocates also requested that SGVWC provide any data or documentation
18 from the start of the employee’s appointment that would demonstrate the Water
19 Resources Project Manager position’s benefits to SGVWC’s current operations. SGVWC
20 claims that the position streamlines liaison duties for managing SGVWC’s Operable
21 Units³³ into a single position, thus, resulting in improved efficiency. SGVWC previously
22 allocated liaison duties for Operable Units across several managerial positions.³⁴ When

³¹ Attachment 2-3: CONFIDENTIAL Attachment D 2024.2025 GRC Positions Evaluation

³² Attachment 2-4: CONFIDENTIAL Response to TGE-009, Response No. 3g, at 6.

³³ The US Environmental Protection Agency defines Superfund cleanup sites as Operable Units. See Attachment 2-7: Response to TGE-016, Response No. 1b, at 2.

³⁴ SGVWC previously utilized LA division’s Operations Manager, Treatment Superintendent, Treatment Supervisor, and Water Quality Superintendent to share liaison functions for Operable Units. See Attachment 2-4: CONFIDENTIAL Response to TGE-009, Response No. 3b, at 5.

1 asked to provide the most recent year's data of the position's tasks and workload that
2 demonstrates these efficiency improvements, SGVWC instead provided a description of
3 the job duties and tasks of the position.^{35 36} SGVWC already described the position's job
4 duties in its testimony.³⁷ SGVWC also provides a blank employee evaluation form,
5 stating that an evaluation of the hired employee's performance as the Water Resources
6 Project Manager will be completed later this year.^{38 39} Cal Advocates notes that repeating
7 the position's job duties and providing a blank evaluation form instead of concrete
8 performance data does not constitute satisfactory evidence that supports SGVWC's
9 request for this new position. As such, SGVWC has not demonstrated that the position
10 delivers measurable improvements to operations or value to ratepayers.

11 Additionally, Cal Advocates requested that SGVWC provide a list of deficiencies
12 that have resulted or would result if the Commission does not approve the Water
13 Resources Project Manager. SGVWC responded to this data request by providing the
14 following reasons: compliance violations, communication gaps, and fragmented
15 management resulting in project delays.⁴⁰ When asked for examples of compliance
16 violations in years prior when SGVWC utilized several managerial positions to conduct
17 liaison duties for its Operable Units, SGVWC did not provide any data.⁴¹ The absence of
18 documented compliance issues undermines SGVWC's claim that the position is
19 necessary to prevent regulatory deficiencies or operational inefficiencies.

20 SGVWC must demonstrate to the Commission that a new position addresses
21 critical needs and deficiencies and offers clear benefits to ratepayers. SGVWC does not

³⁵ Attachment 2-4: CONFIDENTIAL Response to TGE-009, Response No. 3h, at 6.

³⁶ Attachment 2-5: Water Resources Project Manager Job Description.

³⁷ SGVWC EXHIBIT SG-8 Zvirbulis.pdf at 4 to 5.

³⁸ Attachment 2-4: CONFIDENTIAL Response to TGE-009, Response No. 3j, at 6.

³⁹ Attachment 2-6: SGVWC Blank Employee Performance Appraisal Form.

⁴⁰ Attachment 2-4: CONFIDENTIAL Response to TGE-009, Response No. 3i, at 6.

⁴¹ Attachment 2-7: CONFIDENTIAL Response to TGE-016, Response No. 4c and 4d, at 12.

1 demonstrate that their previous liaison structure utilizing multiple positions resulted in
2 any critical unmet needs or deficiencies that would need to be addressed by the Water
3 Resources Project Manager position.

4 **D. Water Quality Specialist (LA division)**

5 The Commission should not require ratepayer funding for SGVWC's request for a
6 new Water Quality Specialist position for the LA division. SGVWC's request is
7 undermined by its current and projected use of outside services for water quality testing
8 and sampling, its ability to comply with past lead sampling legislation with current
9 staffing levels, and the regulations with compliance dates falling outside the years
10 covered in this GRC. Thus, SGVWC's request is unnecessary and offers no additional
11 benefits to ratepayers over this GRC period. This removes \$140,467 from SGVWC's
12 forecast for TY 2026.

13 **1. Outside Services**

14 SGVWC already devotes considerable resources to outside services to conduct a
15 variety of water quality testing related to Title 22 monitoring and testing compliance
16 requirements. During a five-year period from 2020 to 2024, SGVWC spent \$151,110 on
17 outside services to conduct water quality testing in the LA division.⁴² SGVWC includes
18 these costs as part of its expense projections for TY 2026, showing that SGVWC will
19 continue utilizing outside services for work related to water quality testing.⁴³ This
20 ongoing use of outside services demonstrates that SGVWC already utilizes a means to
21 fulfill water quality testing requirements. The addition of a second Water Quality
22 Specialist to the LA division offers no clear operational benefit or improvement over
23 SGVWC's current use of existing staffing and outside contractors.

⁴² Attachment 2-8: TGE-007 Attachment B LA Division Outside Services from 2020-2024. Total calculated by summing all 2020 to 2024 outside services expenses from the Water Quality department.

⁴³ See Cal Advocates Report on Operations and Maintenance Expenses and Administrative and General Expenses, Chapter 1, for an explanation of SGVWC's projected expenses forecast based on 5-year inflation adjusted recorded expense data.

1 **2. Ability to Address Similar Past Lead Testing**
2 **Legislation and Regulation with Current Staffing**

3 SGVWC claims upcoming and current regulations, such as the EPA revised rules
4 for Lead and Copper Rules, necessitate additional water sampling, and therefore, justifies
5 its request for an additional Water Quality Specialist. However, SGVWC previously
6 observed and complied with similar additional lead testing regulations in schools, namely
7 Permit Amendment (PA) NO. 2017PA-Schools issued by the Department of Drinking
8 Water (DDW) and legislation Assembly Bill AB 746 without adding staff.⁴⁴

9 Like the revised EPA Lead and Copper Rule Revision requirements, regulations
10 from PA NO.2017PA-Schools and AB 746 required utilities to conduct “first draw”
11 sampling at schools, which often required earlier work hours.⁴⁵ SGVWC claimed that
12 challenges arose in meeting these regulations, necessitating the use of overtime, make-up
13 hours, and support from other departments.⁴⁶ SGVWC provided Cal Advocates with data
14 on hours allocated specifically to meeting PA NO.2017PA-Schools and AB 746.
15 SGVWC’s data shows that over three years from 2017 to 2019, in LA, the Water Quality
16 Specialist spent a total 78 hours on work related to meeting PA NO.2017PA-Schools and
17 AB 746 data requirements.⁴⁷ By comparison, the Water Quality Superintendent, worked a
18 total of 98 hours over the same three years period to meet lead testing requirements for
19 PA NO.2017PA-Schools and AB 746.⁴⁸ This minimal level of past engagement over
20 three years demonstrates that SGVWC’s current staffing levels is capable of meeting the
21 EPA’s revised Lead and Copper Rules requirements.

⁴⁴ Attachment 2-9: TGE-007 Attachment C Regulations from 2015-2024

⁴⁵ The EPA describes “first-draw” samples as water samples that are collected after sitting still in pipes the night before, usually for a period of 8 to 18 hours.

⁴⁶ Ibid.

⁴⁷ Attachment 2-10: CONFIDENTIAL TGE-012 Attachment D PA NO.2017PA-Schools and AB 746 Staff Hours

⁴⁸ Ibid.

1 **3. Anticipated Regulations Do Not Apply to Current**
2 **GRC**

3 SGVWC cites other regulations, such as the upcoming EPA requirements for Per-
4 and Polyfluoroalkyl Substances (PFAS) Maximum Contaminant Levels (MCLs) and
5 pending DDW requirements for arsenic, cadmium, mercury, and styrene as justifications
6 for adding additional Water Quality Specialist.⁴⁹ However, these regulations have
7 compliance dates that fall outside the years covered in this GRC or currently have no
8 rulemaking in place.

9 For example, the EPA currently requires that public water systems comply with
10 new PFAS MCL's by 2029.⁵⁰ While these rules also require that water systems begin and
11 complete initial monitoring of PFAS levels by 2027, SGVWC already devotes sufficient
12 outside services resources specifically to PFAS related testing.⁵¹

13 SGVWC also anticipates that upcoming DDW rules for MCL's for arsenic,
14 styrene, cadmium, and mercury, will also impact SGVWC operations. However, at the
15 time of this testimony, DDW has yet to issue any rulemaking for these substances, with
16 no concrete rules or compliance dates established.⁵²

17 **E. Water Resources Analyst**

18 The Commission should not require ratepayers to fund SGVWC's request for a
19 Water Resources Analyst for the LA division. Several factors justify this
20 recommendation, such as SGVWC's unreasonable expectation that an analyst position
21 can fulfill responsibilities associated with a manager position, its ability to comply with
22 past legislation with current staffing levels, and its continued use of outside services for
23 work related to water resources, demonstrate that SGVWC's request is unnecessary and

⁴⁹ SGVWC EXHIBIT SG-9 (Fealy).pdf at 27, lines 13 to 22.

⁵⁰ Attachment 2-11: EPA Rules for PFAS.

⁵¹ Attachment 2-8: TGE-007 Attachment B LA Division Outside Services from 2020-2024.

⁵² Attachment 2-12: Department of Drinking Water Rulemaking Status for Cadmium, Mercury, Styrene, and Arsenic.

1 offers no additional benefits to ratepayers. This disallowance removes \$140,467 from
2 SGVWC's forecast for TY 2026.

3 **1. Position Conversion and Replacement of Retired**
4 **Manager Position**

5 SGVWC currently employs one Water Resources Analyst in the LA division and
6 requests an additional Water Resources Analyst position. SGVWC claims that the 2024
7 retirement of the LA division's Water Resources Manager necessitates the hiring of an
8 additional Water Resources Analyst for the LA division.⁵³ However, prior to this current
9 GRC, SGVWC restructured its Water Resources department in both the LA and Fontana
10 divisions.⁵⁴ This restructuring resulted in the Fontana division's Water Resource
11 Manager assuming the Water Resources Director position overseeing both divisions.⁵⁵
12 SGVWC then hired an employee to fill the LA division Water Resources Manager
13 position, vacant due to the 2024 retirement, but then re-classified this employee to
14 become the new Fontana division Water Resources Manager.

15 SGVWC argues that an additional lower-level Water Resources Analyst is
16 necessary due to the retirement of the Water Resources Manager in 2024.⁵⁶ However, the
17 Water Resources Manager position's job duties and responsibilities specifically require
18 management and oversight of other managerial positions such as the Water Quality
19 Superintendent and the Conservation Coordinator, as well as overseeing compliance with
20 regulations and safety requirements.⁵⁷ In contrast, the Water Resources Analyst position
21 duties are limited to administrative duties and support.⁵⁸ SGVWC's request to fill this

⁵³ The Water Resources Manager position is a separate position from the requested Water Resources Project Manager position discussed in Chapter 2, Section C.

⁵⁴ SGVWC EXHIBIT SG-8 Zvirbulis.pdf, at 4, lines 20 to 26.

⁵⁵ Attachment 2-14: CONFIDENTIAL Response to TGE-007, Response No. 7b, at 7.

⁵⁶ SGVWC EXHIBIT SG-8 (Zivirbulis).pdf at 5, lines 19 to 30, and at 6, lines 1-2.

⁵⁷ Attachment 2-13: LA Division Water Resources Manager

⁵⁸ SGVWC EXHIBIT SG-8 (Zivirbulis).pdf at 5, lines 19 to 30, and at 6, lines 1-2.

1 gap with a Water Resources Analyst is unreasonable given the wide difference in job
2 responsibilities and duties between the Manager and Analyst positions.

3 **2. Ability to Address Past Legislation and Regulation**

4 SGVWC justifies its request for a second Water Resources Analyst in the LA
5 division in part by claiming a need for additional support to meet conservation
6 requirements and regulations, such as Water Use Objectives (WUO) and drought
7 reporting.⁵⁹

8 However, SGVWC documentation and testimony show that SGVWC met these
9 conservation regulatory requirements with current staffing levels and by utilizing outside
10 consultants. SGVWC's documentation shows that since 2014, it met various
11 conservation regulations, including drought reporting and water use requirements, by
12 utilizing current internal staff and outside consultants.^{60 61} For example, SGVWC
13 completed water use reporting requirements introduced in 2018 by Senate Bill (SB) 608
14 and Assembly Bill (AB) 1668 by utilizing internal staff for data gathering and hiring
15 outside consultants to complete and submit reports.⁶² Notably, SGVWC completed this
16 work prior to appointing its currently employed Water Resources Analyst in the LA
17 division.⁶³ SGVWC most recently complied with its First Urban Water Use Objectives
18 reporting requirement that was due January 01, 2024.⁶⁴

⁵⁹ SGVWC EXHIBIT SG-8 (Zivirbulis).pdf at 5, lines 19 to 30, and at 6, lines 1-2.

⁶⁰ Attachment 2-9: TGE-007 Attachment C Regulations from 2015-2024.

⁶¹ Attachment 2-14: CONFIDENTIAL Response to TGE-007, Response No. 1d and 2d, at 2 and 3.

⁶² Water reporting requirements introduced by Senate Bill 608 and Assembly Bill 1668. See Attachment 2-9: TGE-007 Attachment C Regulations from 2015-2024.

⁶³ Attachment 2-15: CONFIDENTIAL Response to TGE-012, Responses 1d and 1h at pages 2 to 3. Prior to the current GRC, SGVWC did not employ a Water Resources Analyst. SGVWC converted an employee who previously held a Conservation Specialist position to the LAC division Water Resources Analyst.

⁶⁴ Attachment 2-9: TGE-007 Attachment C Regulations from 2015-2024.

1 SGVWC also indicates that it will continue to rely on outside consultants to help
2 meet conservation regulatory requirements.⁶⁵ SGVWC also claims that it is on track to
3 meet the reporting requirements set out by SB 608 and AB 1668. SGVWC writes, “San
4 Gabriel has contracted a consultant to evaluate both divisions' readiness to comply with
5 the recently adopted regulations. The report from San Gabriel’s consultant indicates that
6 the LAC division is on track to meet current regulations, contingent upon continued
7 funding and efforts in implementation of conservation programming.”⁶⁶ Thus, these facts
8 demonstrate that SGVWC’s current staffing levels and hiring of outside consultants are
9 sufficient to meet current and potential future conservation regulatory requirements.

10 **3. Outside Services**

11 SGVWC data and testimony show that it already devotes considerable resources to
12 outside services and consultants to help meet conservation requirements and conduct
13 water resources work. SGVWC data shows that it spent approximately \$350,000 on work
14 related to water resources and conservation audits from 2020 through 2024.⁶⁷ SGVWC’s
15 outside services estimates in this GRC are based on these past services for water
16 resources, and thus, ratepayers will be funding these costs in O&M expenses This also
17 indicates that SGVWC plans to continue utilizing outside services and consultants for
18 work related to water resources, and as such, the need for an additional Water Resource
19 Analyst is not justified

20 In addition, SGVWC documentation and testimony extensively presents its past
21 and continued dependence on utilizing outside consultants and services to meet WUO
22 requirements, drought reporting and other conservation regulations. This, along with the
23 fact that SGVWC completed water resources work without any Water Resources
24 Analysts in years prior and complied with past conservation legislation, demonstrates that

⁶⁵ SGVWC EXHIBIT SG-9 (Fealy).pdf at 31, lines 6 to 14.

⁶⁶ Ibid.

⁶⁷ Attachment 2-8: TGE-007 Attachment B LA Division Outside Services from 2020-2024.

SGVWC's request for an additional Water Resources Analyst is unnecessary and offers no additional benefit to SGVWC's ratepayers.

IV. CONCLUSION

The Commission should not allow SGVWC to include the cost of these positions in rates for this GRC as SGVWC failed to provide sufficient and reasonable support for these positions' necessity and value to ratepayers. These recommendations remove approximately \$1,318,586 from SGVWC's forecast for TY 2026.

LIST OF ATTACHMENTS FOR CHAPTER 2

#	Attachment #	Description
1	2-1	CONFIDENTIAL Response to TGE-010
2	2-2	LA Division Site Visit Photos
3	2-3	CONFIDENTIAL Attachment D – 2024.2025 GRC Positions Evaluation
4	2-4	CONFIDENTIAL Response to TGE-009
5	2-5	Water Resources Project Manager Job Description
6	2-6	SGVWC Blank Employee Performance Appraisal Form
7	2-7	CONFIDENTIAL Response to TGE-016
8	2-8	TGE-007 Attachment B LA Division Outside Services from 2020-2024
9	2-9	TGE-007 Attachment C Regulations from 2015-2024
10	2-10	CONFIDENTIAL TGE-012 Attachment D PA NO.2017PA-Schools and AB 746 Staff Hours
11	2-11	EPA Rules for PFAS
12	2-12	Department of Drinking Water Rulemaking Status for Cadmium, Mercury, Styrene, and Arsenic
13	2-13	LA Division Water Resources Manager
14	2-14	CONFIDENTIAL Response to TGE-007
15	2-15	CONFIDENTIAL Response to TGE-012

CHAPTER 3 CUSTOMER SERVICE

I. INTRODUCTION

This chapter addresses SGVWC's customer service issues, including compliance with General Order (GO) 103A Performance Standards, and rules governing SGVWC's Emergency Action Plan.

II. SUMMARY OF RECOMMENDATIONS

The Commission should require SGVWC to address its deficiency to comply with GO 103A Telephone Performance standards requiring a 5% or below abandonment rate for customer service calls, in its Fontana division.

The Commission should also address SGVWC's deficiency in its Emergency Response Plan, specifically regarding its readiness to provide safe accessible drinking water in the event of a natural disaster or malevolent acts.

III. ANALYSIS

A. GO-103A Telephone Performance Standards

CPUC Annual Reports for 2023 and 2024 showed that SGVWC was out of compliance with GO 103A requirements governing Telephone Performance standards. Appendix E of GO 103A mandates that utilities maintain a 5% or below abandonment for its customer service calls. SGVWC, as a whole, recorded abandonment rates of 7.6% and 8% for the years 2023 and 2024 respectively, both exceeding the 5% standard.⁶⁸ SGVWC provided additional data showing that the noncompliance occurred in the Fontana division. While LA division recorded abandonment rates of 0.2% and 2.9% for 2023 and 2024 respectively, Fontana division recorded significantly higher abandonment rates of 11.7% and 10.9% respectively.⁶⁹

⁶⁸ Attachment 3-1: SGVWC CPUC Annual Reports for 2023 and 2024, Telephone Performance Standards.

⁶⁹ Attachment 3-2: TGE-001 Response Attachment 1 LA and Fontana Telephone Standards.

1 SGVWC attributes Fontana division's precipitous decline in its compliance with
2 GO-103A's performance standards to four primary factors: the resumption of
3 disconnection pauses related to COVID-19 in 2022, SGVWC-held events for the Low
4 Income Housing Assistance Program (LIHAP), the addition of a third conservation tier,
5 and an antiquated phone system that directed all calls to Fontana's customer service
6 center regardless of the intent of the calls.⁷⁰ SGVWC claims that the first three reasons
7 resulted in a dramatic increase in customer service calls volume, overwhelming Fontana's
8 customer service representatives and increasing the number of abandoned calls that the
9 antiquated phone system compounded the number of abandoned calls as well.⁷¹ SGVWC
10 states that it plans to address its non-compliance with GO-103A's telephone performance
11 standards by implementing a new phone system to improve and streamline its customer
12 service calls.^{72 73}

13 By contrast, the LA division also experienced an increase in calls due to the same
14 factors but largely mitigated these call increases by utilizing dedicated phone
15 receptionists and having three separate branch offices with three separate numbers.⁷⁴

16 **B. Emergency Action Plan**

17 The American Water Infrastructure Act (AWIA), Section 2013, requires that all
18 community water systems serving more than 3,300 people develop Risk and Resilience
19 Assessments (RRAs) and Emergency Response Plans (ERPs). The AWIA mandates that
20 water systems comply with certain requirements in their RRAs and ERPs. SGVWC last
21 updated its ERPs for the Fontana and LA divisions in September 2020. ERP requirements
22 mandate that a utility takes steps to implement plans and procedures that address a

⁷⁰ Attachment 3-3: Response to TGE-003, Response No. 1, at 2.

⁷¹ Ibid.

⁷² Ibid.

⁷³ See Cal Advocates Report on General Office Operations, Texas, and Special Request #4, Chapter 2, Section C, for further discussion of SGVWC's telephone system.

⁷⁴ Attachment 3-4: Response to TGE-017, at 3.

1 system's ability to deliver safe drinking water if a malevolent act or natural disaster
2 occurs.⁷⁵ The AWIA mandates four primary ERP requirements for water systems serving
3 more than 3,3000 people. These four requirements address system resilience, plans and
4 procedures in the event of a malevolent act or natural hazard, actions and procedures to
5 lessen impacts on drinking water, and strategies for detection of malevolent acts and
6 natural hazards.⁷⁶ While SGVWC's ERPs for the LA and Fontana divisions address
7 strategies for improving system resilience and detecting malevolent acts and natural
8 hazards, the ERPs do not sufficiently address specific plans, procedures, or actions to
9 take in the event malevolent act or natural disaster would occur.

10 **1. SGVWC ERPs Lack Specific Plans and Procedures**
11 **That Address System Ability to Deliver Safe**
12 **Drinking Water in an Emergency**

13 SGVWC's ERPs lack specific plans and procedures for when a malevolent act or
14 natural hazard threatens or negatively affects a plant site's ability to deliver safe drinking
15 water to ratepayers. While SGVWC's ERPs list several alternative water sources and
16 interconnected utilities from which SGVWC may source drinking water in case of an
17 emergency, the ERPs do not detail any plans and procedures on how to utilize these
18 sources.⁷⁷ For example, during Cal Advocates' site visit, Cal Advocates staff asked
19 SGVWC employees whether any specific procedures were in place to address plant
20 outages due to a malevolent act or disaster, SGVWC staff replied that no such procedure
21 existed. SGVWC confirmed this in its data request response.⁷⁸ Because some of
22 SGVWC's reservoirs specifically serve a localized set of customers within its service
23 area, it is imperative that SGVWC develop detailed plans and procedures per AWIA
24 requirement to ensure continued water delivery during emergencies.

⁷⁵ Attachment 3-5: American Water Infrastructure Act Section 2013 Screenshot.
www.epa.gov/waterresilience/awia-section-2013#ERP. Retrieved May 1, 2025.

⁷⁶ Ibid.

⁷⁷ Attachment 3-7: CONFIDENTIAL Excerpt from SGVWC LA Emergency Response Plan.

⁷⁸ Attachment 3-6: Response to TGE-008, at 2.

1 IV. CONCLUSION

2 The Commission should order SGVWC to improve its compliance with GO
3 103A's Telephone Performance standards by maintaining a 5% or below abandonment
4 rate for customer service calls, particularly in the Fontana division. Additionally, The
5 Commission should require SGVWC to revise and strengthen its Emergency Response
6 Plan, regarding its readiness and specific planning to safely deliver water to customers in
7 the aftermath of a natural disaster or a malevolent act.

1

LIST OF ATTACHMENTS FOR CHAPTER 3

#	Attachment #	Description
1	3-1	SGVWC CPUC Annual Reports for 2023 and 2024, Telephone Performance Standards.
2	3-2	TGE-001 Response Attachment 1 LA and Fontana Telephone Standards
3	3-3	Response to TGE-003
4	3-4	Response to TGE-017
5	3-5	American Water Infrastructure Act Section 2013 Screenshot
6	3-6	Response to TGE-008
7	3-7	CONFIDENTIAL Excerpt from SGVWC LA Emergency Response Plan

2

CHAPTER 4 WATER QUALITY

I. INTRODUCTION

This chapter addresses SGVWC's water quality and drinking water regulation compliance issues.

II. SUMMARY OF RECOMMENDATIONS

The Commission should grant SGVWC's Special Request #1 and issue a Finding of Fact that SGVWC has complied with all applicable safe drinking water quality standards since the last GRC. However, the Commission should note that while Cal Advocates makes every effort to examine all aspects of a utility's General Rate Case application, including a utility's compliance with water quality standards, the Commission is not the primary regulatory entity responsible for regulating a water utilities' compliance with water quality regulations, and thus defers to the latest findings of Department of Drinking Water 's (DDW) Sanitary Surveys of SGVWC's water systems.

III. ANALYSIS

A. Special Request #1

SGVWC requests that the Commission issue a Finding of Fact that SGVWC has complied with all applicable safe drinking water quality standards since the last GRC. Based on Cal Advocates' review, there is no evidence that SGVWC has violated safe drinking water quality standards and testing requirements that have not already been addressed and rectified. Cal Advocates reviewed key applicable documentation, such as Consumer Confidence Reports and Sanitary Surveys of SGVWC's water systems conducted by the DDW. While DDW did find several deficiencies for SGVWC systems in both the LA and Fontana divisions, SGVWC issued reply letters to DDW demonstrating evidence that the utility took remedial actions to rectify each of the noted

1 deficiencies.⁷⁹ DDW has noted that SGVWC generally operates well-operated and well-
2 managed water systems.⁸⁰

3 However, despite these findings, Cal Advocates' primary role is to advocate for
4 ratepayers and ensure that utilities provide safe, reliable water service at the lowest
5 possible cost. The responsibility of determining and enforcing water quality standards
6 and regulations falls primarily on DDW, who conducts the Sanitary Surveys and ensures
7 water quality compliance.

8 **IV. CONCLUSION**

9 The Commission should grant SGVWC's Special Request #1 and issue a Finding
10 of Fact that SGVWC complied with all applicable safe drinking water quality standards
11 since the last GRC. Cal Advocates' recommendations are based on the latest DDW's
12 Sanitary Surveys and the reported remedial actions taken by SGVWC since the last GRC.

⁷⁹ SGVWC EXHIBIT SG-9 (Fealy), ATTACHMENT J, at pdf pp. 2043 to 2268.

⁸⁰ SGVWC EXHIBIT SG-9 (Fealy), ATTACHMENT J, at pdf pp. 2044 to 2045.

CHAPTER 5 ENVIRONMENTAL AND SOCIAL JUSTICE ACTION PLAN

I. INTRODUCTION

This chapter testimony addresses SGVWC's compliance with the Environmental and Social Justice (ESJ) Action Plan.

II. SUMMARY OF RECOMMENDATIONS

The Commission should address SGVWC's noncompliance with General Order (GO) 156's supplier diversity rules requiring SGVWC to meet a 1.5% procurement goal for Disabled Veteran Enterprises (DVEs).

The Commission should also address SGVWC's incomplete testimony, which addresses only five of the nine applicable ESJ Action Plan goals, by affirming that the Commission and utilities both share responsibility in advancing ESJ Action Plan goals and principles.

III. ANALYSIS

The Environmental and Social Justice (ESJ) Action Plan, established in 2019 and updated to Version 2.0 in 2022, sets out nine goals that address health, safety, consumer protection, programming benefits and enforcement in all CPUC regulatory jurisdictions and sectors.⁸¹ These goals are crafted to benefit disadvantaged and marginalized communities and to ensure their participation and visibility in CPUC proceedings.

Cal Advocates' review of SGVWC's application found deficiencies in SGVWC's adherence to the nine ESJ Action Plan Goals. First, SGVWC did not meet GO-156's supplier diversity rules requiring that a utility allocate at least 1.5% of its total annual procurement to Disabled Veteran Enterprise businesses for the years 2022 through

⁸¹ Attachment 5-1: Excerpt from Environmental Social Justice Action Plan 2.0 Goals.

2024.⁸² ⁸³ Second, SGVWC submitted incomplete testimony on its adherence to the ESJ Action Plan by only addressing five out of the nine total ESJ goals.⁸⁴

A. General Order 156 Supplier Diversity Requirements

ESJ Action Plan Goal 7 promotes career paths and opportunities for ESJ community residents, specifically addresses increasing supplier diversity for utilities under its revised concrete item 7.3.3.⁸⁵ The ESJ Action Plan also cites GO-156 as a foundational document that inspired the ESJ Action Plan’s creation.⁸⁶ SGVWC failed to meet supplier diversity goals set by GO-156 that a utility allocates at least 1.5% of its total annual procurement spending to businesses owned by Disabled Veteran Enterprises (DVE) from 2022 to 2024.⁸⁷ A CPUC report on utility compliance with GO-156 goals shows that SGVWC allocated 1.35% of total procurement to DVE businesses in 2022, and only 0.53% of total procurement to DVE businesses in 2023.⁸⁸ In response to a Cal Advocates data request, SGVWC states that it allocated 1.28% to DVE businesses for its total procurement spending in 2024.⁸⁹ When asked if the utility has any plan to eventually meet the 1.5% goal, SGVWC states it will continue to refine its future strategy to find opportunities to contract with qualified DVE businesses but does not provide any concrete planning or steps to address its deficiency.⁹⁰

⁸² Attachment 5-2: Excerpt from CPUC Report on 2023 Supplier Diversity Procurement

⁸³ Attachment 5-3: Response to TGE-011, Response No. 1c, at 2.

⁸⁴ SGVWC EXHIBIT SG-13 (Yucelen).pdf, at 16 to 21 (pdf at 21 to 26).

⁸⁵ Attachment 5-1: Excerpt from CPUC Environmental and Social Justice Action Plan 2.0. Goals.

⁸⁶ Ibid.

⁸⁷ Attachment 5-4: General Order 156 Revised April 2022, at 17.

⁸⁸ Attachment 5-2: Excerpt from CPUC Report on 2023 Supplier Diversity Procurement

⁸⁹ Attachment 5-3: Response to TGE-011, Response No. 1c, at 2.

⁹⁰ Ibid.

B. General Adherence to all ESJ Action Plan Goals

SGVWC submitted testimony that addressed only the first five ESJ Action Plan goals. In response to a Cal Advocates data request asking why SGVWC did not include the remaining goals, SGVWC stated that it considers Goals 6, 8, and 9 to be Commission goals rather than utility goals as the reason for not submitting any written testimony for these goals. SGVWC submitted data and materials in support of its adherence to ESJ Action Plan Goals 7, 8, and 9, while also stating that Goals 8 and 9 are firmly Commission goals. SGVWC did not provide any support for its adherence to Goal 6. However, the ESJ Action Plan language clearly states that the utilities have a responsibility in advancing all action plan goals. Specifically, the ESJ Action Plan states, “The CPUC expects regulated entities to conform to the goals and principles outlined in the ESJ Action Plan.” The Commission should address SGVWC’s incomplete testimony by affirming this ESJ Action Plan language and reinforcing that regulated utilities are expected to support and advance all ESJ goals and principles.

IV. CONCLUSION

The Commission should address SGVWC's noncompliance with GO-156's supplier diversity rules requiring SGVWC to meet a 1.5% procurement goal for DVE businesses. The Commission should also address SGVWC's incomplete testimony on its adherence to the ESJ Action Plan compliance by affirming that utilities share a responsibility to advance ALL goals and principles as outlined in the ESJ Action Plan.

LIST OF ATTACHMENTS FOR CHAPTER 5

#	Attachment #	Description
1	5-1	Excerpt from Environmental Social Justice Action Plan 2.0 Goals
2	5-2	Excerpt from CPUC Report on 2023 Supplier Diversity Procurement
3	5-3	Response to TGE-011
4	5-4	General Order 156 Revised April 2022

ATTACHMENTS

LIST OF ATTACHMENTS FOR CHAPTER 1

#	Attachment #	Description
1	1-1	Qualifications of Witness
2	1-2	Response to TGE-014
3	1-3	AACE International Recommended Practice No. 18R-97
4	1-4	Response to TGE-013
5	1-5	TGE-013 ATTACHMENT a.ii.pdf PLC Hardware Technical Memorandum
6	1-6	SGVWC PLC Los Angeles County Division REVISED TGE-013 b.ii.xls

Attachment 1-1: Qualifications of Witness

1 **QUALIFICATIONS AND PREPARED TESTIMONY**
2 **OF**
3 **TIMOTHY GEE**
4

5 Q.1 Please state your name and address.

6 A.1 My name is Timothy Gee.
7

8 Q.2 By whom are you employed and what is your job title?

9 A.2 I am employed by the Public Advocates Office at the California Public Utilities
10 Commission. I am a Public Utilities Regulatory Analyst I.
11

12 Q.3 Please describe your educational and professional experience.

13 A.3 I graduated from the School of Global Policy and Strategy at UC San Diego with a
14 Master of Public Policy degree. I graduated with a specialization in Program
15 Design and Evaluation. I have three years of experience as a Regulatory Analyst
16 with Cal Advocates.
17

18 Q.4 What is your area of responsibility in this proceeding?

19 A.4 My areas of responsibility cover SGVWC's requests for SCADA, 8 new positions,
20 and Special Request #1. I also reviewed SGVWC's application regarding
21 customer service, water quality, and the ESJ Action Plan.
22

23 Q.5 Does that complete your prepared testimony?

24 A.5 Yes.

Attachment 1-2: Response to TGE-014

SAN GABRIEL VALLEY WATER COMPANY

May 6, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: Response to Data Request No. CONFIDENTIAL TGE-014 (Supervisory Control and Data Acquisition 2)

Dear Mr. Aslam:

In response to your data request dated April 29, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

Please respond to the following items (a) through (f), in reference to the following documents:

- Exhibit SG-6 (Swift) CONFIDENTIAL VERSION, Confidential Attachment L, SCADA Technical Memorandum
- SCADA Technical Memorandum Appendix F (SCADA Technician Staffing Assessment)
- A.25-01-001 Public Advocates CONFIDENTIAL DR TGE-013 (Supervisory Control and Data Acquisition 2)
- SGVWC's Response to A.25-01-001 Public Advocates CONFIDENTIAL DR TGE-013 (Supervisory Control and Data Acquisition 2)
- a. **[BEGIN CONFIDENTIAL]** Please refer to the SCADA Technical Memorandum Appendix F (SCADA Technician Staffing Assessment) and SGVWC's response to Public Advocates DR TGE-013 (Supervisory Control and Data Acquisition 2). The SCADA Technical Memorandum Appendix F identifies 33 individual tasks for which a SCADA Technician is responsible. In SGVWC's response to TGE013, SGVWC answers questions 1.e.i, 1.e.ii, and 1.e.iii with the same passage, stating that SCADA

Technicians will perform all tasks listed in Appendix F except for Task 10, Task 18, and Task 31. Please answer the following questions.

- i. Do any current SGVWC staff perform any of the 33 tasks and functions listed in SCADA Technical Memorandum Appendix F (SCADA Technician Staffing Assessment)? If the answer is “yes,” please provide in a tabulated Excel spreadsheet the employee positions, and the unique employee identification numbers, and the unique task number or numbers as identified as SCADA Technical Memorandum Appendix F performed by these SGVWC employees. Please refer to the example table below and add more informational columns if necessary. If the answer is “no,” please explain in detail how these tasks are currently performed and identify who performs them.

[TABLE OMITTED]

- ii. Do any current SGVWC staff perform any SCADA related tasks that are otherwise not listed among the 33 tasks listed in the SCADA Technical Memorandum Appendix F? If the answer is “yes,” please provide in a tabulated Excel spreadsheet the employee positions, and the unique employee identification numbers, and a brief description of the SCADA related task or tasks that are otherwise not listed in SCADA Technical Memorandum Appendix F? Please refer to the example table below and add more informational columns if necessary. If the answer is “no,” please explain in detail how these SCADA related tasks are currently performed and identify who performs them.

[TABLE OMITTED]

- b. On pages 7 to 8 of the SCADA Technical Memorandum, at Section 1.3.2 PLC Controller Hardware and Software Evaluation, Table 1 shows an inventory of 51 Tesco L-2000 PLCs for the Fontana (FWC) division, while Table 2 shows a PLC inventory of 33 Tesco L-1000 PLCs, 13 Tesco L-2000 PLCs, 1 Tesco L-3000 PLC, 2 Allen Bradley CompactLogix (1769-XXX) PLCs, and 7 Allen Bradley SLC 5/05 PLCs for the LA County (LAC) division. Please also refer to SGVWC’s Response to A.25-01-001 Public Advocates CONFIDENTIAL DR TGE-013 (Supervisory Control and Data Acquisition 2). As part of SGVWC’s response, SGVWC provided Excel files TGE-013 Attachment b.i, and TGE-013 Attachment b.ii, which lists Programmable Logic Controller inventory for Fontana and LAC divisions respectively. Please answer the following questions.
 - i. Do any current SGVWC staff perform any of the 33 tasks and functions listed in SCADA Technical Memorandum Appendix F (SCADA Technician Staffing Assessment) specifically for the 2 Allen Bradley CompactLogix (1769-XXX) PLCs, and 7 Allen Bradley SLC 5/05 PLCs in LAC division? If the answer is “yes,” please provide in a tabulated Excel spreadsheet the employee positions, and the unique employee identification numbers, and the unique task number or numbers

as identified as SCADA Technical Memorandum Appendix F performed by these SGVWC employees. Please refer to the example table below and add more informational columns if necessary. If the answer is "no," please explain in detail how these tasks are currently performed and identify who performs them for the Rockwell Allen Bradley PLCs.

[TABLE OMITTED]

- ii. Excel file TGE-013 ATTACHMENT b.i, shows 45 L-2000 model PLCs in the Fontana division, including the 2 PLCs at Site F46. Table 1 on page 8 of the SCADA Technical Memorandum shows 51 Tesco L-2000 PLCs in the Fontana division. Please explain in detail the discrepancy in inventory numbers between TGE-013 ATTACHMENT b.i and pages 7 to 8 of the SCADA Technical Memorandum for the Tesco L-2000 PLC model.
- iii. Excel file TGE-013 ATTACHMENT b.i, show 3 L-3000 model PLCs at sites F31, F58, and F63R in the Fontana division. However, Table 1 on page 8 of the SCADA Technical Memorandum does not list any Tesco L3000 PLCs in Fontana division's PLC inventory. Please explain the discrepancy in inventory numbers between TGE-013 ATTACHMENT b.i and page 8 of the SCADA Technical Memorandum for the Tesco L-3000 PLC model.
- iii. Excel file TGE-013 ATTACHMENT b.i, show 3 L-3000 model PLCs at sites F31, F58, and F63R in the Fontana division. However, Table 1 on page 8 of the SCADA Technical Memorandum does not list any Tesco L-3000 PLCs in Fontana division's PLC inventory. Please explain the discrepancy in inventory numbers between TGE-013 ATTACHMENT b.i and page 8 of the SCADA Technical Memorandum for the Tesco L-3000 PLC model.
- iv. When did Tesco first release its L-3000 series PLC to the open market? Please provide an approximate date, as well as any supporting materials, brochures, or other documents that support this release date.
- v. Excel file TGE-013 ATTACHMENT b.i, Rows 28 and 44, shows that SGVWC installed L3000 PLCs at sites F31 and F58 in 2004 in the Fontana division. TGE-013 ATTACHMENT b.i also shows that SGVWC installed the older model L2000 PLCs at most of its Fontana sites in the years 2004 and 2005. Similarly, TGE-013 ATTACHMENT b.ii, Rows 4, 5, 7, 8, 31, 36, 40, and 41 show that SGVWC installed L3000 PLCs at each of these sites in 2008, while SGVWC installed older Tesco PLC models at many of its sites the same year in 2008. Please explain why SGVWC chose to install older model Tesco PLCs at its sites when the newer L3000 was available.
- vi. Excel file TGE-013 ATTACHMENT b.ii, shows that 34 of the 39 sites listed have multiple PLCs installed in LAC division. However, SGVWC does not list each individual PLC at SGVWC's various LAC sites as originally requested in Data

Request TGE-013. Please provide in an Excel tabulated spreadsheet for each individual current PLC the unique identifying serial number, the site at which the individual PLC is installed, installation date of current individual PLC, cost of the current individual PLC, proposed new PLC model, proposed cost of new PLC, and reason for replacement. If there are multiple PLCs installed at a site, then the Excel spreadsheet should list each individual PLC installed at that site separately. For example, if Plant No. 1 has three L3000 PLCs installed, then each of the three individual L3000 PLCs should be listed in the Excel spreadsheet along with their unique identifying serial number(s), the site at which the individual PLC is installed, installation date of current individual PLC, cost of the current individual PLC, proposed new PLC model, proposed cost of new PLC, and reason for replacement. Please refer to the sample table below.

[TABLE OMITTED]

- vii. Are the “LIQ 5” PLCs as shown in Excel file TGE-013 ATTACHMENT b.ii the same model as the Tesco L-1000 PLCs as show in Table 2 on page 8 of the SCADA Technical Memorandum? Additionally, TGE-013 ATTACHMENT b.ii lists 24 sites as having multiple LIQ 5 PLCs, implying that there are at least 48 LIQ 5 PLCs.¹ If the answer is “yes,” please explain in detail the discrepancy between the 48 PLCs shown in TGE-013 ATTACHMENT b.ii and the 33 PLCs shown in page 8 of the SCADA Technical Memorandum. If the answer is “no,” please provide a detailed explanation for why TGE-013 ATTACHMENT b.ii and the SCADA Technical Memorandum lists two different models in LAC Division’s PLC inventory.
- viii. Excel file TGE-013 ATTACHMENT b.ii does not list any of the 2 Allen Bradley CompactLogix (1769-XXX) PLCs, and 7 Allen Bradley SLC 5/05 PLCs that were listed in Table 2 on page 8 of the SCADA Technical Memorandum. Please explain why these Rockwell Allen Bradley PLCs are not listed in TGE-013 ATTACHMENT b.ii.
- ix. Excel file TGE-013 ATTACHMENT b.ii shows 8 sites as having multiple L-3000 PLCs installed in LAC division. However, Table 2 on page 8 of the SCADA Technical Memorandum shows only 1 Tesco L-3000 PLC for LAC division’s PLC inventory. Please explain the discrepancy in inventory numbers between TGE-013 ATTACHMENT b.ii and pages 7 to 8 of the SCADA Technical Memorandum for the Tesco L-3000 PLC model.
- x. Excel file TGE-013 ATTACHMENT b.ii shows 7 L-2000 PLCs in LAC division, while Table 2 on page 8 of the SCADA Technical Memorandum shows 13 Tesco L-2000 PLCs for LAC division’s PLC inventory. Please explain the discrepancy in inventory numbers between TGE-013 ATTACHMENT b.ii and page 8 of the SCADA Technical Memorandum for the Tesco L-2000 PLC model.

¹ See Footnote 3.

- xi. Excel file TGE-013 ATTACHMENT b.ii shows a total of 39 sites in the LAC division, with 34 sites listed as having multiple PLCs installed. This implies that at minimum, 34 sites have at least 68 total PLCs installed.² However, Table 2 on page 8 of the SCADA Technical Memorandum shows a total of 56 PLCs in the LAC division, including the Allen Bradley PLCs. Please explain this discrepancy in the number of PLCs for LAC division in detail.
- c. Please refer to pdf file TGE-013 ATTACHMENT a.ii, "PLC Hardware RFI Technical Memorandum," provided to Cal Advocates in SGVWC's response to Data Request TGE-013. TGE-013 ATTACHMENT a.ii shows the results of SGVWC's Request for Information (RFI) for five PLC vendors, including Rockwell, Schneider Electric, Tesco, Honeywell, and Maple Systems. TGE-013 ATTACHMENT a.ii, page 3 (pdf page 8), also states that SGVWC submitted RFIs to 12 additional vendors, but these vendors did not respond to the RFI.

Please answer the following questions.

- i. Has SGVWC submitted a Request for Proposal (RFP) to Rockwell, Schneider Electric, Tesco, Honeywell, and Maple Systems, or any other vendor for SGVWC's PLC installation? If the answer is "yes," please provide a copy of the RFP that SGVWC sent to PLC vendors. Please also provide a list of these vendors, as well as complete copies of all replies to SGVWC's RFP by each vendor. If the answer is "no," please provide an estimated date of when SGVWC plans to send this RFP. Please also provide a list of vendors to whom SGVWC will send this RFP. If SGVWC does not plan to issue an RFP, please provide a detailed explanation of SGVWC's justification to not issue one.
- ii. Has SGVWC conducted any other competitive bidding process other than an RFP in which different vendors submitted their proposed costs and logistics for the installation of PLCs in SGVWC's SCADA system? If the answer is "yes," please provide a list of vendors that submitted proposals, as well as complete copies of vendors' proposals to install PLCs for SGVWC. If the answer is "no," please explain in detail why SGVWC has yet to conduct a competitive bidding process in which potential PLC vendors can submit their proposals? If SGVWC does not plan to hold a competitive bidding process, please provide a detailed explanation of SGVWC's justification to not conduct one. **[END CONFIDENTIAL]**

RESPONSE NO. 1:

- a.
 - i. Please see \ TGE-014 ATTACHMENT 1.a.i.xlsx\ San Gabriel does not have any designated staff member or position that is assigned to perform any of the tasks listed on TGE-014 ATTACHMENT 1.a.i. Whichever staff member holding the position title listed on TGE-014 ATTACHMENT 1.a.i., that is available at the time of the need, can be assigned to the task. As noted on TGE-014 ATTACHMENT 1.a.i., staff only
-

provides the tier level of support listed. This can result in the issue still not being resolved and often requires a vendor, contractor, or system integrator to complete additional required work to resolve the issue.

- ii. No. SCADA related tasks that are not listed among the 33 tasks listed in the SCADA Technical Memorandum Appendix F are performed by a vendor, contractor or system integrator as needed.
- b.
- i. Please see \ TGE-014 ATTACHMENT 1.b.i.xlsx\ . San Gabriel does not have any designated staff member or position that is assigned to perform any of the tasks listed on TGE-014 ATTACHMENT 1.b.i. . Whichever staff member holding the position title listed on TGE-014 ATTACHMENT 1.b.i., that is available at the time of the need, can be assigned to the task. As noted on TGE-014 ATTACHMENT 1.b.i., staff only provides the tier level of support listed. This can result in the issue still not being resolved and often requires a vendor, contractor, or system integrator to complete additional required work to resolve the issue.
 - ii. Excel file \TGE-013 ATTACHMENT b.i.xlsx\ listed L-2000 PLCs that were located at system sites. The file did not include the one L-2000 PLC located at the SCADA Tower at FWC Headquarters or the five spare L-2000 PLCs that FWC has for emergency replacement and/or utilizing for parts.

Adding these five L-2000s to the forty-five L-2000s on the Excel file \TGE-013 ATTACHMENT b.i.xlsx\ results in a total of fifty-one Tesco L-2000 PLCs. The same total of L-2000s on Table 1 on page 8 of the SCADA Technical Memorandum.

- iii. San Gabriel confirmed with West Yost that the original PLC inventory list provided to West Yost by San Gabriel, used by West Yost to develop the SCADA Technical Memorandum FWC and LAC PLC Inventory tables, was from the most recent PLC Inventory available at the time completed by Tesco in June of 2018.

As a result, changes in PLCs and/or additional sites with SCADA constructed and finished after the Tesco inventory date of June 2018 are reflected in the tables provided and not captured in the SCADA Technical Memorandum.

Therefore, the response tables reflect the most accurate field verified account of existing PLCs in both the FWC and LAC system.

- iv. Via email; Danielle Berrios Project Manager I at Tesco confirmed that Tesco began production of the L3000 in June of 2013. San Gabriel requested any supporting materials, brochures or other documents supporting that date; however, none were provided by the time of this Data Request response.
- v. San Gabriel contacted Tesco to provide installation dates in response to TGE-013. Tesco indicated they do not have installation dates for PLCs readily accessible to

provide San Gabriel. Tesco indicated that PLC installation dates are in Tesco archives in project folders, and Tesco would need to locate and go through each San Gabriel project file to obtain these dates. Tesco estimated it would take several weeks to compile the inventory, and Tesco would invoice San Gabriel for the required labor it takes to complete this Data Request. As a result, San Gabriel proceeded with its internal investigation to obtain PLC installation dates. San Gabriel found the Bill of Materials, located in Operations and Maintenance Manuals of Tesco for each site. San Gabriel provided the dates of the Bill of Materials for the PLC installation dates on both ATTACHMENT b.i., and b.ii with the TGE-013 response.

San Gabriel later learned from Tesco that the dates from the Bill of Material located in Operations and Maintenance Manuals of Tesco for each site represent the installation date of the original PLC, and if a PLC was replaced at that site following this date, that replaced PLC installation date would not be reflected on the Bill of Material. This would only apply to sites that have had a PLC replaced.

This is the explanation for why it appears that a L3000 PLC was installed in 2004 and in 2008. In those cases, the 2004 and 2008 PLC installation date, used from the Bill of Material, is the PLC installation date of the original PLC that was likely an L2000, and was replaced at some point with an L3000. Tesco confirmed that the L3000 was not in production until June of 2013. Therefore, the installation date for any L3000 should not be earlier than June of 2013.

Follow-ups with Tesco by San Gabriel, to obtain PLC installation dates for these noted L3000s, have not been responded to. San Gabriel is wholly reliant on Tesco for the majority of SCADA related services and inventory and has no designated full time in-house expert to track, verify, fully maintain or repair its SCADA equipment. This has placed San Gabriel at a severe disposition in managing a critical element of its daily operations. The compounding degradation of Tesco services has expedited the Company's need to improve its SCADA management hardware and inhouse expertise.

vi. Please see attached REVISED TGE-013 ATTACHMENT b.ii that lists each individual PLC installed at that site separately, for LAC sites having multiple PLCs.

vii. No.

The LIQ 5 PLC is Tesco's oldest model PLC. The LIQ 5 does not have the capability of receiving and transmitting telemetry on its own. Tesco installed L1000 PLCs at sites having LIQ 5 PLCs. Doing this allows LIQ 5 to perform some functions, while L1000 performs others. Together LIQ 5 and L1000 can conduct the required SCADA functions for the sites they are located at.

viii. Please see attached revised TGE-013 ATTACHMENT b.ii that lists each individual PLC installed at that site separately, for LAC sites having multiple PLCs.

- ix. San Gabriel confirmed with West Yost that the original PLC inventory list provided to West Yost by San Gabriel, used by West Yost to develop the SCADA Technical Memorandum FWC and LAC PLC Inventory tables, was from the most recent PLC Inventory available at the time completed by Tesco in June of 2018.

As a result, changes in PLCs and/or additional sites with SCADA constructed and finished after the Tesco inventory date of June 2018 are reflected in the tables provided and not captured in the SCADA Technical Memorandum.

Therefore, the response tables reflect the most accurate field verified account of existing PLCs in both the FWC and LAC system.

- x. San Gabriel confirmed with West Yost that the original PLC inventory list provided to West Yost by San Gabriel, used by West Yost to develop the SCADA Technical Memorandum FWC and LAC PLC Inventory tables, was from the most recent PLC Inventory available at the time completed by Tesco in June of 2018.

As a result, changes in PLCs and/or additional sites with SCADA constructed and finished after the Tesco inventory date of June 2018 are reflected in the tables provided and not captured in the SCADA Technical Memorandum.

Therefore, the response tables reflect the most accurate field verified account of existing PLCs in both the FWC and LAC system.

- xi. San Gabriel confirmed with West Yost that the original PLC inventory list provided to West Yost by San Gabriel, used by West Yost to develop the SCADA Technical Memorandum FWC and LAC PLC Inventory tables, was from the most recent PLC Inventory available at the time completed by Tesco in June of 2018.

As a result, changes in PLCs and/or additional sites with SCADA constructed and finished after the Tesco inventory date of June 2018 are reflected in the tables provided and not captured in the SCADA Technical Memorandum.

Therefore, the response tables reflect the most accurate field verified account of existing PLCs in both the FWC and LAC system.

- c.
i. San Gabriel currently utilizes the vendor Tesco for PLC installations and has for decades. This has resulted in San Gabriel's SCADA operating systems consisting of an overwhelming majority of Tesco PLCs.

When a PLC installation is required, San Gabriel contacts Tesco. Tesco will request from San Gabriel site SCADA needs and other pertinent information and/or plant design plans. Tesco will use this requested information to determine what SCADA

equipment, software, and any ancillary equipment and work is needed to install a Tesco PLC at that site.

As stated in San Gabriel's previous response to TGE-013, San Gabriel selected the PLC vendor Rockwell, pursuant to the results and recommendation of the PLC Hardware Technical Memorandum dated September 2023, prepared by West Yost.

At the direction of West Yost, following the PLC vendor selection, San Gabriel proceeded with drafting a PLC specification that is currently in draft and under inhouse review.

San Gabriel will proceed with the OIT RFI, using a similar process and procedure as the PLC RFI, to select an OIT vendor. San Gabriel expects to proceed with issuing the OIT RFI following the finalization of the PLC specifications, in 2025.

Following the completion of the PLC specification and OIT vendor selection, San Gabriel will have the necessary tasks completed, pursuant to the SCAD Masterplan, to issue RFPs to vendors other than Tesco for Rockwell PLC installations and maintenance.

ii. Please see the response to c.i.

RESPONDING WITNESSES: Swift/Zielke

Sincerely,

/s/ Joel M Reiker

Joel M. Reiker
Vice President, Regulatory Affairs

Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)

/encl.

Attachment 1-3: AACE International Recommended Practice No. 18R-97



AACE International Recommended Practice No. 18R-97

COST ESTIMATE CLASSIFICATION SYSTEM – AS APPLIED IN ENGINEERING, PROCUREMENT, AND CONSTRUCTION FOR THE PROCESS INDUSTRIES

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Recommended Practice No. 18R-97

Cost Estimate Classification System – As Applied in Engineering,
Procurement, and Construction for the Process Industries



February 2, 2005

PURPOSE

As a recommended practice of AACCE International, the Cost Estimate Classification System provides guidelines for applying the general principles of estimate classification to project cost estimates (i.e., cost estimates that are used to evaluate, approve, and/or fund projects). The Cost Estimate Classification System maps the phases and stages of project cost estimating together with a generic maturity and quality matrix, which can be applied across a wide variety of industries.

This addendum to the generic recommended practice provides guidelines for applying the principles of estimate classification specifically to project estimates for engineering, procurement, and construction (EPC) work for the process industries. This addendum supplements the generic recommended practice (17R-97) by providing:

- a section that further defines classification concepts as they apply to the process industries;
- charts that compare existing estimate classification practices in the process industry; and
- a chart that maps the extent and maturity of estimate input information (project definition deliverables) against the class of estimate.

As with the generic standard, an intent of this addendum is to improve communications among all of the stakeholders involved with preparing, evaluating, and using project cost estimates specifically for the process industries.

It is understood that each enterprise may have its own project and estimating processes and terminology, and may classify estimates in particular ways. This guideline provides a generic and generally acceptable classification system for process industries that can be used as a basis to compare against. It is hoped that this addendum will allow each user to better assess, define, and communicate their own processes and standards in the light of generally-accepted cost engineering practice.

INTRODUCTION

For the purposes of this addendum, the term process industries is assumed to include firms involved with the manufacturing and production of chemicals, petrochemicals, and hydrocarbon processing. The common thread among these industries (for the purpose of estimate classification) is their reliance on process flow diagrams (PFDs) and piping and instrument diagrams (P&IDs) as primary scope defining documents. These documents are key deliverables in determining the level of project definition, and thus the extent and maturity of estimate input information.

Estimates for process facilities center on mechanical and chemical process equipment, and they have significant amounts of piping, instrumentation, and process controls involved. As such, this addendum may apply to portions of other industries, such as pharmaceutical, utility, metallurgical, converting, and similar industries. Specific addendums addressing these industries may be developed over time.

This addendum specifically does not address cost estimate classification in nonprocess industries such as commercial building construction, environmental remediation, transportation infrastructure, “dry” processes such as assembly and manufacturing, “soft asset” production such as software development, and similar industries. It also does not specifically address estimates for the exploration, production, or transportation of mining or hydrocarbon materials, although it may apply to some of the intermediate processing steps in these systems.

The cost estimates covered by this addendum are for engineering, procurement, and construction (EPC) work only. It does not cover estimates for the products manufactured by the process facilities, or for research and development work in support of the process industries. This guideline does not cover the significant building construction that may be a part of process plants. Building construction will be covered in a separate addendum.

This guideline reflects generally-accepted cost engineering practices. This addendum was based upon the practices of a wide range of companies in the process industries from around the world, as well as published references and standards. Company and public standards were solicited and reviewed by the AACE International Cost Estimating Committee. The practices were found to have significant commonalities that are conveyed in this addendum.

COST ESTIMATE CLASSIFICATION MATRIX FOR THE PROCESS INDUSTRIES

The five estimate classes are presented in figure 1 in relationship to the identified characteristics. Only the level of project definition determines the estimate class. The other four characteristics are secondary characteristics that are generally correlated with the level of project definition, as discussed in the generic standard. The characteristics are typical for the process industries but may vary from application to application.

This matrix and guideline provide an estimate classification system that is specific to the process industries. Refer to the generic standard for a general matrix that is non-industry specific, or to other addendums for guidelines that will provide more detailed information for application in other specific industries. These will typically provide additional information, such as input deliverable checklists to allow meaningful categorization in those particular industries.

ESTIMATE CLASS	Primary Characteristic	Secondary Characteristic			
	LEVEL OF PROJECT DEFINITION Expressed as % of complete definition	END USAGE Typical purpose of estimate	METHODOLOGY Typical estimating method	EXPECTED ACCURACY RANGE Typical variation in low and high ranges [a]	PREPARATION EFFORT Typical degree of effort relative to least cost index of 1 [b]
Class 5	0% to 2%	Concept Screening	Capacity Factored, Parametric Models, Judgment, or Analogy	L: -20% to -50% H: +30% to +100%	1
Class 4	1% to 15%	Study or Feasibility	Equipment Factored or Parametric Models	L: -15% to -30% H: +20% to +50%	2 to 4
Class 3	10% to 40%	Budget, Authorization, or Control	Semi-Detailed Unit Costs with Assembly Level Line Items	L: -10% to -20% H: +10% to +30%	3 to 10
Class 2	30% to 70%	Control or Bid/Tender	Detailed Unit Cost with Forced Detailed Take-Off	L: -5% to -15% H: +5% to +20%	4 to 20
Class 1	50% to 100%	Check Estimate or Bid/Tender	Detailed Unit Cost with Detailed Take-Off	L: -3% to -10% H: +3% to +15%	5 to 100

Notes: [a] The state of process technology and availability of applicable reference cost data affect the range markedly. The +/- value represents typical percentage variation of actual costs from the cost estimate after application of contingency (typically at a 50% level of confidence) for given scope.
[b] If the range index value of "1" represents 0.005% of project costs, then an index value of 100 represents 0.5%. Estimate preparation effort is highly dependent upon the size of the project and the quality of estimating data and tools.

Figure 1. – Cost Estimate Classification Matrix for Process Industries

CHARACTERISTICS OF THE ESTIMATE CLASSES

The following charts (figures 2a through 2e) provide detailed descriptions of the five estimate classifications as applied in the process industries. They are presented in the order of least-defined estimates to the most-defined estimates. These descriptions include brief discussions of each of the estimate characteristics that define an estimate class.

For each chart, the following information is provided:

- **Description:** a short description of the class of estimate, including a brief listing of the expected estimate inputs based on the level of project definition.
- **Level of Project Definition Required:** expressed as a percent of full definition. For the process industries, this correlates with the percent of engineering and design complete.
- **End Usage:** a short discussion of the possible end usage of this class of estimate.
- **Estimating Methods Used:** a listing of the possible estimating methods that may be employed to develop an estimate of this class.
- **Expected Accuracy Range:** typical variation in low and high ranges after the application of contingency (determined at a 50% level of confidence). Typically, this results in a 90% confidence that the actual cost will fall within the bounds of the low and high ranges.
- **Effort to Prepare:** this section provides a typical level of effort (in hours) to produce a complete estimate for a US\$20,000,000 plant. Estimate preparation effort is highly dependent on project size, project complexity, estimator skills and knowledge, and on the availability of appropriate estimating cost data and tools.
- **ANSI Standard Reference (1989) Name:** this is a reference to the equivalent estimate class in the existing ANSI standards.
- **Alternate Estimate Names, Terms, Expressions, Synonyms:** this section provides other commonly used names that an estimate of this class might be known by. These alternate names are not endorsed by this Recommended Practice. The user is cautioned that an alternative name may not always be correlated with the class of estimate as identified in the chart.

CLASS 5 ESTIMATE	
<p>Description: Class 5 estimates are generally prepared based on very limited information, and subsequently have wide accuracy ranges. As such, some companies and organizations have elected to determine that due to the inherent inaccuracies, such estimates cannot be classified in a conventional and systemic manner. Class 5 estimates, due to the requirements of end use, may be prepared within a very limited amount of time and with little effort expended—sometimes requiring less than an hour to prepare. Often, little more than proposed plant type, location, and capacity are known at the time of estimate preparation.</p> <p>Level of Project Definition Required: 0% to 2% of full project definition.</p> <p>End Usage: Class 5 estimates are prepared for any number of strategic business planning purposes, such as but not limited to market studies, assessment of initial viability, evaluation of alternate schemes, project screening, project location studies, evaluation of resource needs and budgeting, long-range capital planning, etc.</p>	<p>Estimating Methods Used: Class 5 estimates virtually always use stochastic estimating methods such as cost/capacity curves and factors, scale of operations factors, Lang factors, Hand factors, Chilton factors, Peters-Timmerhaus factors, Guthrie factors, and other parametric and modeling techniques.</p> <p>Expected Accuracy Range: Typical accuracy ranges for Class 5 estimates are - 20% to -50% on the low side, and +30% to +100% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p>Effort to Prepare (for US\$20MM project): As little as 1 hour or less to perhaps more than 200 hours, depending on the project and the estimating methodology used.</p> <p>ANSI Standard Reference Z94.2-1989 Name: Order of magnitude estimate (typically -30% to +50%).</p> <p>Alternate Estimate Names, Terms, Expressions, Synonyms: Ratio, ballpark, blue sky, seat-of-pants, ROM, idea study, prospect estimate, concession license estimate, guesstimate, rule-of-thumb.</p>

Figure 2a. – Class 5 Estimate

CLASS 4 ESTIMATE	
<p>Description: Class 4 estimates are generally prepared based on limited information and subsequently have fairly wide accuracy ranges. They are typically used for project screening, determination of feasibility, concept evaluation, and preliminary budget approval. Typically, engineering is from 1% to 15% complete, and would comprise at a minimum the following: plant capacity, block schematics, indicated layout, process flow diagrams (PFDs) for main process systems, and preliminary engineered process and utility equipment lists.</p> <p>Level of Project Definition Required: 1% to 15% of full project definition.</p> <p>End Usage: Class 4 estimates are prepared for a number of purposes, such as but not limited to, detailed strategic planning, business development, project screening at more developed stages, alternative scheme analysis, confirmation of economic and/or technical feasibility, and preliminary budget approval or approval to proceed to next stage.</p>	<p>Estimating Methods Used: Class 4 estimates virtually always use stochastic estimating methods such as equipment factors, Lang factors, Hand factors, Chilton factors, Peters-Timmerhaus factors, Guthrie factors, the Miller method, gross unit costs/ratios, and other parametric and modeling techniques.</p> <p>Expected Accuracy Range: Typical accuracy ranges for Class 4 estimates are -15% to -30% on the low side, and +20% to +50% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p>Effort to Prepare (for US\$20MM project): Typically, as little as 20 hours or less to perhaps more than 300 hours, depending on the project and the estimating methodology used.</p> <p>ANSI Standard Reference Z94.2-1989 Name: Budget estimate (typically -15% to + 30%).</p> <p>Alternate Estimate Names, Terms, Expressions, Synonyms: Screening, top-down, feasibility, authorization, factored, pre-design, pre-study.</p>

Figure 2b. – Class 4 Estimate

CLASS 3 ESTIMATE	
<p>Description: Class 3 estimates are generally prepared to form the basis for budget authorization, appropriation, and/or funding. As such, they typically form the initial control estimate against which all actual costs and resources will be monitored. Typically, engineering is from 10% to 40% complete, and would comprise at a minimum the following: process flow diagrams, utility flow diagrams, preliminary piping and instrument diagrams, plot plan, developed layout drawings, and essentially complete engineered process and utility equipment lists.</p> <p>Level of Project Definition Required: 10% to 40% of full project definition.</p> <p>End Usage: Class 3 estimates are typically prepared to support full project funding requests, and become the first of the project phase "control estimates" against which all actual costs and resources will be monitored for variations to the budget. They are used as the project budget until replaced by more detailed estimates. In many owner organizations, a Class 3 estimate may be the last estimate required and could well form the only basis for cost/schedule control.</p>	<p>Estimating Methods Used: Class 3 estimates usually involve more deterministic estimating methods than stochastic methods. They usually involve a high degree of unit cost line items, although these may be at an assembly level of detail rather than individual components. Factoring and other stochastic methods may be used to estimate less-significant areas of the project.</p> <p>Expected Accuracy Range: Typical accuracy ranges for Class 3 estimates are -10% to -20% on the low side, and +10% to +30% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p>Effort to Prepare (for US\$20MM project): Typically, as little as 150 hours or less to perhaps more than 1,500 hours, depending on the project and the estimating methodology used.</p> <p>ANSI Standard Reference Z94.2-1989 Name: Budget estimate (typically -15% to + 30%).</p> <p>Alternate Estimate Names, Terms, Expressions, Synonyms: Budget, scope, sanction, semi-detailed, authorization, preliminary control, concept study, development, basic engineering phase estimate, target estimate.</p>

Figure 2c. – Class 3 Estimate

CLASS 2 ESTIMATE	
<p>Description: Class 2 estimates are generally prepared to form a detailed control baseline against which all project work is monitored in terms of cost and progress control. For contractors, this class of estimate is often used as the "bid" estimate to establish contract value. Typically, engineering is from 30% to 70% complete, and would comprise at a minimum the following: process flow diagrams, utility flow diagrams, piping and instrument diagrams, heat and material balances, final plot plan, final layout drawings, complete engineered process and utility equipment lists, single line diagrams for electrical, electrical equipment and motor schedules, vendor quotations, detailed project execution plans, resourcing and work force plans, etc.</p> <p>Level of Project Definition Required: 30% to 70% of full project definition.</p> <p>End Usage: Class 2 estimates are typically prepared as the detailed control baseline against which all actual costs and resources will now be monitored for variations to the budget, and form a part of the change/variation control program.</p>	<p>Estimating Methods Used: Class 2 estimates always involve a high degree of deterministic estimating methods. Class 2 estimates are prepared in great detail, and often involve tens of thousands of unit cost line items. For those areas of the project still undefined, an assumed level of detail takeoff (forced detail) may be developed to use as line items in the estimate instead of relying on factoring methods.</p> <p>Expected Accuracy Range: Typical accuracy ranges for Class 2 estimates are -5% to -15% on the low side, and +5% to +20% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p>Effort to Prepare (for US\$20MM project): Typically, as little as 300 hours or less to perhaps more than 3,000 hours, depending on the project and the estimating methodology used. Bid estimates typically require more effort than estimates used for funding or control purposes.</p> <p>ANSI Standard Reference Z94.2-1989 Name: Definitive estimate (typically -5% to + 15%).</p> <p>Alternate Estimate Names, Terms, Expressions, Synonyms: Detailed control, forced detail, execution phase, master control, engineering, bid, tender, change order estimate.</p>

Figure 2d. – Class 2 Estimate

CLASS 1 ESTIMATE	
<p>Description: Class 1 estimates are generally prepared for discrete parts or sections of the total project rather than generating this level of detail for the entire project. The parts of the project estimated at this level of detail will typically be used by subcontractors for bids, or by owners for check estimates. The updated estimate is often referred to as the current control estimate and becomes the new baseline for cost/schedule control of the project. Class 1 estimates may be prepared for parts of the project to comprise a fair price estimate or bid check estimate to compare against a contractor's bid estimate, or to evaluate/dispute claims. Typically, engineering is from 50% to 100% complete, and would comprise virtually all engineering and design documentation of the project, and complete project execution and commissioning plans.</p> <p>Level of Project Definition Required: 50% to 100% of full project definition.</p> <p>End Usage: Class 1 estimates are typically prepared to form a current control estimate to be used as the final control baseline against which all actual costs and resources will now be monitored for variations to the budget, and form a part of the change/variation control program. They may be used to evaluate bid checking, to support vendor/contractor negotiations, or for claim evaluations and dispute resolution.</p>	<p>Estimating Methods Used: Class 1 estimates involve the highest degree of deterministic estimating methods, and require a great amount of effort. Class 1 estimates are prepared in great detail, and thus are usually performed on only the most important or critical areas of the project. All items in the estimate are usually unit cost line items based on actual design quantities.</p> <p>Expected Accuracy Range: Typical accuracy ranges for Class 1 estimates are -3% to -10% on the low side, and +3% to +15% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p>Effort to Prepare (for US\$20MM project): Class 1 estimates require the most effort to create, and as such are generally developed for only selected areas of the project, or for bidding purposes. A complete Class 1 estimate may involve as little as 600 hours or less, to perhaps more than 6,000 hours, depending on the project and the estimating methodology used. Bid estimates typically require more effort than estimates used for funding or control purposes.</p> <p>ANSI Standard Reference Z94.2 Name: Definitive estimate (typically -5% to + 15%).</p> <p>Alternate Estimate Names, Terms, Expressions, Synonyms: Full detail, release, fall-out, tender, firm price, bottoms-up, final, detailed control, forced detail, execution phase, master control, fair price, definitive, change order estimate.</p>

Figure 2e. – Class 1 Estimate

COMPARISON OF CLASSIFICATION PRACTICES

Figures 3a through 3c provide a comparison of the estimate classification practices of various firms, organizations, and published sources against one another and against the guideline classifications. These tables permits users to benchmark their own classification practices.


	AACE Classification Standard	ANSI Standard Z94.0	AACE Pre-1972	Association of Cost Engineers (UK) ACostE	Norwegian Project Management Association (NFP)	American Society of Professional Estimators (ASPE)
	Class 5	Order of Magnitude Estimate -30/+50	Order of Magnitude Estimate	Order of Magnitude Estimate Class IV -30/+30	Concession Estimate	Level 1
					Exploration Estimate	
					Feasibility Estimate	
	Class 4	Budget Estimate -15/+30	Study Estimate	Study Estimate Class III -20/+20	Authorization Estimate	Level 2
	Class 3		Preliminary Estimate	Budget Estimate Class II -10/+10	Master Control Estimate	Level 3
	Class 2	Definitive Estimate -5/+15	Definitive Estimate	Definitive Estimate Class I -5/+5	Current Control Estimate	Level 4
	Class 1		Detailed Estimate			Level 5
						Level 6

Figure 3a. – Comparison of Classification Practices

	AACE Classification Standard	Major Consumer Products Company (Confidential)	Major Oil Company (Confidential)	Major Oil Company (Confidential)	Major Oil Company (Confidential)
INCREASING PROJECT DEFINITION ↓	Class 5	Class S Strategic Estimate	Class V Order of Magnitude Estimate	Class A Prospect Estimate Class B Evaluation Estimate	Class V
	Class 4	Class 1 Conceptual Estimate	Class IV Screening Estimate	Class C Feasibility Estimate Class D Development Estimate	Class IV
	Class 3	Class 2 Semi-Detailed Estimate	Class III Primary Control Estimate	Class E Preliminary Estimate	Class III
	Class 2	Class 3 Detailed Estimate	Class II Master Control Estimate	Class F Master Control Estimate	Class II
	Class 1		Class I Current Control Estimate	Current Control Estimate	Class I

Figure 3b. – Comparison of Classification Practices

	AACE Classification Standard	J.R. Heizelman, 1988 AACE Transactions [1]	K.T. Yeo, The Cost Engineer, 1989 [2]	Stevens & Davis, 1988 AACE Transactions [3]	P. Behrenbruck, Journal of Petroleum Technology, 1993 [4]
INCREASING PROJECT DEFINITION ↓	Class 5	Class V	Class V Order of Magnitude	Class III*	Order of Magnitude
	Class 4	Class IV	Class IV Factor Estimate	Class II	Study Estimate
	Class 3	Class III	Class III Office Estimate		Budget Estimate
	Class 2	Class II	Class II Definitive Estimate		
	Class 1	Class I	Class I Final Estimate	Class I	Control Estimate

[1] John R. Heizelman, ARCO Oil & Gas Co., 1988 AACE Transactions, Paper V3.7

[2] K.T. Yeo, The Cost Engineer, Vol. 27, No. 6, 1989

[3] Stevens & Davis, BP International Ltd., 1988 AACE Transactions, Paper B4.1 (* Class III is inferred)

[4] Peter Behrenbruck, BHP Petroleum Pty., Ltd., article in Petroleum Technology, August 1993

Figure 3c. – Comparison of Classification Practices

ESTIMATE INPUT CHECKLIST AND MATURITY MATRIX

Figure 4 maps the extent and maturity of estimate input information (deliverables) against the five estimate classification levels. This is a checklist of basic deliverables found in common practice in the process industries. The maturity level is an approximation of the degree of completion of the deliverable. The degree of completion is indicated by the following letters.

- None (blank): development of the deliverable has not begun.
- Started (S): work on the deliverable has begun. Development is typically limited to sketches, rough outlines, or similar levels of early completion.
- Preliminary (P): work on the deliverable is advanced. Interim, cross-functional reviews have usually been conducted. Development may be near completion except for final reviews and approvals.
- Complete (C): the deliverable has been reviewed and approved as appropriate.

General Project Data:	ESTIMATE CLASSIFICATION				
	CLASS 5	CLASS 4	CLASS 3	CLASS 2	CLASS 1
Project Scope Description	General	Preliminary	Defined	Defined	Defined
Plant Production/Facility Capacity	Assumed	Preliminary	Defined	Defined	Defined
Plant Location	General	Approximate	Specific	Specific	Specific
Soils & Hydrology	None	Preliminary	Defined	Defined	Defined
Integrated Project Plan	None	Preliminary	Defined	Defined	Defined
Project Master Schedule	None	Preliminary	Defined	Defined	Defined
Escalation Strategy	None	Preliminary	Defined	Defined	Defined
Work Breakdown Structure	None	Preliminary	Defined	Defined	Defined
Project Code of Accounts	None	Preliminary	Defined	Defined	Defined
Contracting Strategy	Assumed	Assumed	Preliminary	Defined	Defined
Engineering Deliverables:					
Block Flow Diagrams	S/P	P/C	C	C	C
Plot Plans		S	P/C	C	C
Process Flow Diagrams (PFDs)		S/P	P/C	C	C
Utility Flow Diagrams (UFDs)		S/P	P/C	C	C
Piping & Instrument Diagrams (P&IDs)		S	P/C	C	C
Heat & Material Balances		S	P/C	C	C
Process Equipment List		S/P	P/C	C	C
Utility Equipment List		S/P	P/C	C	C
Electrical One-Line Drawings		S/P	P/C	C	C
Specifications & Datasheets		S	P/C	C	C
General Equipment Arrangement Drawings		S	P/C	C	C
Spare Parts Listings			S/P	P	C
Mechanical Discipline Drawings			S	P	P/C
Electrical Discipline Drawings			S	P	P/C
Instrumentation/Control System Discipline Drawings			S	P	P/C
Civil/Structural/Site Discipline Drawings			S	P	P/C

Figure 4. – Estimate Input Checklist and Maturity Matrix

REFERENCES

- ANSI Standard Z94.2-1989. **Industrial Engineering Terminology: Cost Engineering.**
AACE International Recommended Practice No.17R-97, **Cost Estimate Classification System.**

Attachment 1-4: Response to TGE-013

SAN GABRIEL VALLEY WATER COMPANY

April 16, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: Response to Data Request No. CONFIDENTIAL TGE-013 (Supervisory Control and Data Acquisition 2)

Dear Mr. Aslam:

In response to your data request dated April 9, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

Please respond to the following items (a) through (f), in reference to the following documents:

- Exhibit SG-6 (Swift) CONFIDENTIAL VERSION, Confidential Attachment L, SCADA Technical Memorandum
- Exhibit SG-7 (Zielke), Confidential Attachment N, Appendix G Cyber-RRA Results
- Exhibit SG-7 (Zielke), Confidential Attachment N, S.J. Zielke Memorandum dated June 7, 2024, as found on pdf pages 2 through 11.
- A.25-01-001 Public Advocates CONFIDENTIAL DR MTN-009 (Supervisory Control and Data Acquisition)
- SGVWC's Response to Data Request No. MTN-009 (Supervisory Control and Data Acquisition)
- Excel Workpaper "GRC Workpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4."

- a. [BEGIN CONFIDENTIAL] On pages 16 to 17 of the SCADA Technical Memorandum, Section 2.2 PLC Controller Hardware and Software discusses the replacement options for SGVWC's current Programmable Logic Controllers (PLCs) and current Operator Interface Terminals (OITs). On page 16, the memorandum states

11142 GARVEY AVENUE • P.O. BOX 6010 • EL MONTE, CALIFORNIA 91734-2010 • (626) 448-6183 • Fax (626) 448-5530

“There are several options for PLC hardware in the water sector. To conduct a thorough investigation of potential options, West Yost recommends that SGVWC issue a Request for Information (RFI) to all PLC hardware vendors to solicit information.” Please answer the following questions.

- i. On page 16, the memorandum states, “All obsolete, proprietary PLCs will be replaced with SGVWC-standard PLCs.” On page 17, the memorandum similarly describes “SGVWC-standard OITs” Please describe in detail what is a “SGVWC-standard PLC.” Please also describe in detail what is a “SGVWC-standard OIT.”
 - ii. Has SGVWC already issued an RFI to PLC vendors to solicit information? If the answer is “yes,” please provide a copy of the RFI that SGVWC sent to PLC vendors. Please also provide a list of these vendors, as well as complete copies of all replies to SGVWC’s RFI for each vendor. If the answer is “no,” please provide an estimated date of when SGVWC plans to send this RFI. Please also provide a list of potential vendors to whom SGVWC will send this RFI.
 - iii. Has SGVWC already selected a vendor option to potentially replace SGVWC’s current PLCs? If the answer is “yes,” please identify the PLC vendor and provide a detailed explanation why SGVWC selected this vendor. If the answer is “no,” please explain in detail why SGVWC has not yet selected a vendor and provide an estimate date of selection.
 - iv. The technical memorandum similarly recommends that SGVWC issue an RFI to OIT vendors. Has SGVWC already issued an RFI to OIT vendors to solicit information? If the answer is “yes,” please provide a copy of the RFI that SGVWC sent to OIT vendors. Please also provide a list of these vendors, as well as complete copies of all replies to SGVWC’s RFI for each vendor. If the answer is “no,” please provide an estimated date of when SGVWC plans to send this RFI. Please also provide a list of vendors to whom SGVWC will send this RFI.
 - v. Has SGVWC already selected a vendor option to potentially replace SGVWC’s current OITs? If the answer is “yes,” please identify the OIT vendor and provide a detailed explanation why SGVWC selected this vendor. If the answer is “no,” please explain in detail why SGVWC has not yet selected a vendor and provide an estimate date of selection.
- b. On pages 7 to 8 of the SCADA Technical Memorandum, at Section 1.3.2 PLC Controller Hardware and Software Evaluation, Table 1 shows an inventory of 51 Tesco L-2000 PLCs for the Fontana (FWC) division, while Table 2 shows a PLC inventory of 33 Tesco L-1000 PLCs, 13 Tesco L-2000 PLCs, 1 Tesco L-3000 PLC, 2 Allen Bradley CompactLogix (1769-XXX) PLCs, and 7 Allen Bradley SLC 5/05 PLCs. for the LA County (LAC) division.

- i. Please provide in a tabulated Excel spreadsheet the following information for each of the 51 Tesco L-2000 PLCs in FWC division: current model (e.g. Tesco L-2000, Tesco L-3000, etc.), unique identifying serial number, plant site or location, installation date of current PLC, cost of current PLC, proposed new PLC model, proposed cost of new PLC, proposed date of installation, reason for replacement, and whether the new PLC addresses a Priority 1, 2, 3, or 4 Control as described in Exhibit SG-7 Confidential Attachment N, Appendix G Cyber-RRA Results at pdf pages 252 to 253. Please refer to the sample table below. Please add additional information columns if necessary.

Current Model	ID/Serial Number	Plant Site or Site	Current PLC Install Date	Current PLC Cost	Proposed New PLC Model	Proposed Install Date	Proposed Cost	Reason for Replacement	Priority 1, 2, 3, or 4 Control

- ii. Please provide in a tabulated Excel spreadsheet the following information for each of the 33 Tesco L-1000 PLCs, 13 Tesco L-2000 PLCs, 1 Tesco L3000 PLC, 2 Allen Bradley CompactLogix (1769-XXX) PLCs, and 7 Allen Bradley SLC 5/05 PLCs in the LA County (LAC) division: current model (e.g. Tesco L-2000, Tesco L-3000, etc.), unique identifying serial number, plant site or location, installation date of current PLC, cost of current PLC, proposed new PLC model, proposed cost of new PLC, reason for replacement, and whether the new PLC addresses a Priority 1, 2, 3, or 4 Control as described in Exhibit SG-7 Confidential Attachment N, Appendix G Cyber-RRA Results at pdf pages 252 to 253. Please refer to the sample table below. Please add additional information columns if necessary.

Current Model	ID/Serial Number	Plant Site or Site	Current PLC Install Date	Current PLC Cost	Proposed New PLC Model	Proposed Install Date	Proposed Cost	Reason for Replacement	Priority 1, 2, 3, or 4 Control

- c. Pages 8 to 9 of the SCADA Technical Memorandum, at Section 1.3.3 SCADA Software, discusses the replacement of Aveva's Wonderware software with Inductive Automation's Ignition software. Please answer the following.

- i. Does SGVWC anticipate that the new Ignition software will integrate seamlessly with SGVWC's choice of new hardware for PLCs and OITs? If the answer is "yes," please explain in detail how and why. If the answer is "no," please explain in detail how and why, as well as explain how SGVWC will address any issues of compatibility between the Ignition software and new anticipated hardware including PLCs and OITs.
 - ii. Does SGVWC currently deploy Ignition software for Allen Bradley PLCs and OITs in LAC division?
 - iii. In SGVWC's Response to Data Request No. MTN-009, SGVWC states that "The full Ignition software implementation in LAC will be completed 2025." Please provide in a tabulated Excel spreadsheet a complete list of all LAC sites that currently utilize Ignition software, as well as a list of all LAC sites that do not currently utilize Ignition software.
 - iv. Please provide a detailed explanation why Aveva's Wonderware software is no longer supported. Please also provide the latest release version of the Wonderware software utilized by SGVWC. Please also provide the date when SGVWC last updated the Wonderware software.
 - v. Please provide the names of the SGVWC position or positions whose job duties include upkeep and updating Aveva's Wonderware software and SGVWC's SCADA software in general.
- d. In Exhibit SG-7 (Zielke), Confidential Attachment N, the Memorandum written by S.J. Zielke and dated June 7, 2024, discusses SGVWC's current contract with Tesco. Please answer the following questions.
- i. Please provide a copy of SGVWC's current contract with Tesco. Please also identify and highlight the specific pages, passages, and lines in the contract stipulating that only Tesco technicians can conduct work and repairs on Tesco hardware and equipment.
 - ii. Has SGVWC ever engaged in discussions with Tesco to address the apparent operational deficiencies of SGVWC's current SCADA operations? If the answer is "yes," please explain in detail the outcomes of this discussion and provide supporting documentation such as meeting minutes, email records, etc. If the answer is "no," please explain in detail why SGVWC chose not to explore alternative solutions with Tesco regarding SCADA operations and issues faced by the company in terms of maintenance, repair, service, upgrades, lack of operational capabilities, etc.

- e. In Exhibit SG-7 (Zielke), Confidential Attachment N, in the Memorandum written by S.J. Zielke and dated June 7, 2024, on page 10 (pdf page 11), Zielke writes that staffing SCADA technicians will result in service costs savings of \$93,597 for FWC and \$146,320 for LAC, before implementing the LAC and FWC SCADA Masterplans. The Memorandum also states that these costs savings were calculated by assuming 50% in labor costs for the average annual 2016-2022 contracted costs for Tesco related services, or 50% of \$187,195 for FWC and 50% of \$292,640 for LAC. However, the Memorandum previously stated on page 5 (pdf page 6) that "Since Tesco proprietary PLCs and OITs are used throughout all facilities, only Tesco is able to provide maintenance and support." Excel Workpaper "GRCWorkpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4," lines 333 and 481 also show anticipated hiring dates of 7/1/2025 for each of the proposed SCADA technicians. Please answer the following.
- i. Please explain in detail how SGVWC will realize the estimated labor cost savings \$93,597 for FWC and \$146,320 for LAC by hiring the SCADA technicians when SGVWC is still utilizing Tesco hardware at its various plant sites and contractually restricted to only utilize Tesco technicians to work on the existing SCADA systems.
 - ii. Will SGVWC's new SCADA technicians be able to conduct repairs, maintenance, and support for SGVWC's current Tesco hardware? If the answer is "yes," please explain in detail why.
 - iii. Please provide a detailed description of the specific job duties and responsibilities the new SCADA technicians would conduct prior to the installation of new SCADA hardware and equipment that would replace Tesco's proprietary hardware and equipment.
- f. In Exhibit SG-7 (Zielke), Confidential Attachment N, in the Memorandum written by S.J. Zielke and dated June 7, 2024, on page 10 (pdf page 11), Zielke writes that implementing and maintaining LAC and FWC's SCADA Masterplans would result in an annual cost savings of \$259,800 associated Tesco labor and service costs. Please answer the following.
- i. Please provide a step-by-step detailed explanation of how SGVWC calculated this cost savings of \$259,800. Please also provide the mathematical equation that arrives at this \$259,800 figure in MS Excel format.
 - ii. Please provide a detailed explanation of how the costs associated with the \$259,000 in estimated annual Tesco labor and service costs, is different and separate from the estimated Tesco service labor costs previously calculated at \$93,597 for FWC and \$146,320 for LAC on page 10 of the Memorandum (pdf page 11). [END CONFIDENTIAL]

RESPONSE NO. 1:

[BEGIN CONFIDENTIAL]

a.

- i. SGVWC did not have a formal specification or requirement for a standardized PLC or OIT. Since Tesco is the PLC provider, SGVWC deferred to its vendor for making this determination on a project by project and site by site basis.

The proposed SCADA Masterplan aimed to remedy the Company's lack of a formal PLC/OIT specification by including tasks for SGVWC to develop its own standards and specifications for PLCs and OITs for future installations and replacements.

- ii. Yes, SGVWC issued a PLC RFI to vendors in June of 2023. Please see \TGE-013 ATTACHMENT a.ii.pdf, PLC Hardware Technical Memorandum dated September 2023, prepared by West Yost that includes the list of PLC vendors who received an RFI and a detailed evaluation conducted by West Yost of each vendors responses.

- iii. Yes, pursuant to the results and recommendation of the PLC Hardware Technical Memorandum (TGE-13 ATTACHMENT a.ii.pdf) dated September 2023, prepared by West Yost, SGVWC selected the PLC vendor Rockwell.

- iv. No, SGVWC has not issued an RFI to OIT vendors. At the direction of West Yost, following the PLC vendor selection, SGVWC proceeded with drafting and developing a PLC specification that is currently in draft and under review.

SGVWC will proceed with the OIT RFI, using a similar process and procedure as the PLC RFI, to select an OIT vendor. As stated in the memorandum, the OIT selection will need to be completed early in the SCADA Masterplan. SGVWC expects to proceed with issuing the OIT RFI following the finalization of the PLC specifications, in 2025.

- v. No, SGVWC has not issued an RFI to OIT vendors. At the direction of West Yost, following the PLC vendor selection, SGVWC proceeded with the drafting and developing of a PLC specification that is currently in draft and under review.

SGVWC will proceed with the OIT RFI using a similar process and procedure as the PLC RFI, to select an OIT vendor. As stated in the Memorandum, the OIT selection will need to be completed early in the SCADA Masterplan. SGVWC expects to proceed with issuing the OIT RFI following the finalization of the PLC specifications, in 2025.

b.

- i. Please see \TGE-013 ATTACHMENT b.i.xlsx\.

- ii. Please see \TGE-013 ATTACHMENT b.ii.xlsx\.

c.

- i. Yes. The June 2023 PLC RFI, developed by West Yost and issued to vendors, informing responding vendors that SGVWC utilizes the SCADA software Ignition (by Inductive Automation), and that the PLC must integrate seamlessly with this software.
- ii. The installation and deployment of Ignition software is in progress in the LAC division and is fully deployed in the FWC division. The Ignition software will be utilized in Tesco and/or Allen Bradley PLCs.
- iii. The installation and deployment of Ignition software is in progress in the LAC division. This is expected to be completed in 2025. Once the installation of the Ignition client is complete LAC sites will be cutover to Ignition as part of this project. Currently, there are no sites in LAC operating with the Ignition software.
- iv. Tesco has confirmed that Aveva Wonderware software is at the Lifecycle status of Mature Support. Tesco states Mature Support for software, "signifies the final phase before a product is retired. During this phase, technical support is still available, but new features, patches, and hotfixes are no longer provided." Updates are no longer available.

The latest version of Wonderware software utilized by SGVWC is Wonderware Intouch 11.1.08 (2014 R2). Tesco confirmed that the last upgrade for this software was completed in 2015.

Currently only the LAC division uses this Wonderware software. The installation and deployment of Ignition software is in progress in the LAC division.

- v. The vendor Tesco currently provides these services.

d.

- i. SGVWC contracts with Tesco on an as needed basis, for including but not limited to troubleshooting, repairs, new installations, replacements, integration, updates, and programming. These contracts vary in scope and cost based on the nature of what is required for that specific project. There is no single contract between SGVWC and Tesco.

The software required to program Tesco PLCs is not available to vendors outside of Tesco. Therefore, Tesco staff are required to make PLC software-related changes, repairs, troubleshooting, etc. on Tesco PLCs, making Tesco PLCs inherently proprietary.

- ii. Yes. In 2021 United Flow Technologies acquired Tesco. Prior to the acquisition Tesco provided adequate service to SGVWC.

Following the acquisition Tesco's service began to deteriorate. As a result, SGVWC requested Tesco to attend regularly scheduled project update and tracking meetings to keep projects progressing and on schedule. These meetings were generally held over the phone and email follow-ups occurred as needed. These meetings were not formalized through minutes or agendas. These meetings included multiple staff from both Tesco and SGVWC, depending on the scope of the project.

Since the acquisition in 2021, Tesco has changed their assigned SGVWC Project Manager five times, due to staffing changes and the reorganization of their company.

In 2023 SGVWC increased the frequency of these meetings to biweekly to keep projects on track, because the previous meeting frequency was not adequate. Unfortunately, from August of 2023 through March of 2024 Tesco was unable to dedicate a Project Manager to SGVWC and could not commit to these biweekly update meetings.

However, Tesco was able to resume attending these meetings on a semi-regular basis from March 2024 to current, when they assigned the most current Project Manager to SGVWC in March of 2024.

Most recently, on April 15, 2025, during a biweekly meeting, Tesco notified SGVWC that the current Tesco Project Manager Pierce Webster is leaving Tesco, and his last day is April 25, 2025. Pierce's supervisor Earl Hester informed SGVWC of this update and notified SGVWC that Tesco currently does not have a replacement Project Manager assigned to SGVWC projects.

Tesco continues to not always be able to attend these biweekly meetings. Projects, responses, and services continue to be postponed for various reasons provided by Tesco including but not limited to lack of resource availability, resource changes, and shipping delays.

e.

- i. Pursuant to the West Yost SCADA Technical Memorandum Appendix F (SCADA Technician Staffing Assessment) upon hire, the SCADA Technicians will be able to perform all tasks listed except for Task 10, Task 18, and Task 31, until Tesco PLC replacement has occurred. For sites that are not equipped with Tesco PLCs, and for future new sites that will be equipped with Allen Bradley Rockwell PLCs, the SCADA Technician will perform all tasks listed on the SCADA Technician Staffing Assessment.
- ii. Pursuant to the West Yost SCADA Technical Memorandum Appendix F (SCADA Technician Staffing Assessment) upon hire, the SCADA Technicians will be able to

perform all tasks listed except for Task 10, Task 18, and Task 31, until Tesco PLC replacement has occurred. For sites that are not equipped with Tesco PLCs, and for future new sites that will be equipped with Allen Bradley Rockwell PLCs, the SCADA Technician will perform all tasks listed on the SCADA Technician Staffing Assessment.

- iii. Pursuant to the West Yost SCADA Technical Memorandum Appendix F (SCADA Technician Staffing Assessment) upon hire, the SCADA Technicians will be able to perform all tasks listed except for Task 10, Task 18, and Task 31, until Tesco PLC replacement has occurred. For sites that are not equipped with Tesco PLCs, and for future new sites that will be equipped with Allen Bradley Rockwell PLCs, the SCADA Technician will perform all tasks listed on the SCADA Technician Staffing Assessment.

Additionally, please see Appendix D SCADA Technician Job Description of the SCADA Technical Memorandum for an overall detailed description of the specific job duties and responsibilities of the new SCADA Technicians.

f.

- i. Step by step calculation:

- 52 weeks in one year.
- 40 hours per standard work week.
- $52 \text{ weeks/year} \times 40 \text{ hours/week} = 2,080 \text{ hours worked/one year.}$
- Tesco Standard Rate (\$185.00/hour) from Memorandum Attachment F (Tesco Professional Services Rate Sheet 2023).
- $2,080 \text{ hours/year} \times \$185.00/\text{hour} = \$384,800/\text{year}$ for SGVWC to contract with Tesco to complete the tasks included in Appendix F (SCADA Technician Staffing Assessment) in the SCADA Technical Memorandum.
- \$125,000/year (proposed salary for one SGVWC SCADA Technician pursuant to SCADA Technician Job Description Appendix B of the SCADA Technical Memorandum and Attachment F SCADA Technician Industry Position Comps from the Memorandum.
- $\$384,800/\text{year Tesco SCADA Technician services} - \$125,000/\text{year SGVWC SCADA Technician salary for same services} = \$259,800.$

Please See \TGE-013 ATTACHMENT F.I.xlsx\ for the requested MS Excel format calculation.

- ii. The estimated amount of \$93,597 for FWC and the estimated amount of \$146,320 for LAC represent the estimated annual fiscal reduction in current / existing Tesco service costs, that the hiring and staffing of the two SCADA Technicians will result in, for each

division. This estimate does not consider future new plant SCADA additions or increase in Tesco cost for any future required services not currently being completed by Tesco. This estimate does not include the proposed SCADA Masterplan implementation and maintenance tasks required by a SCADA Technician. This estimation assumes the SCADA Masterplan is not in effect.

The amount of \$259,000 is the estimated savings in cost from hiring and staffing a SCADA Technician to complete the SCADA Technician tasks identified in Appendix F SCADA Technician Staffing Assessment from the SCADA Technical Memorandum for implementation and maintenance of the proposed SCADA Masterplan, versus contracting with Tesco to complete the same tasks. This estimate does not take into consideration Tesco's current increased rates for after-hours and emergency service rates, or any escalation for future rate increases for services.

[END CONFIDENTIAL]

RESPONDING WITNESSES: Swift/Zielke

Sincerely,

/s/ Joel M Reiker

Joel M. Reiker
Vice President, Regulatory Affairs

Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)

/encl.

Attachment 1-5: TGE-013 ATTACHMENT a.ii.pdf PLC Hardware Technical Memorandum

TECHNICAL MEMORANDUM | SEPTEMBER 2023

PLC Hardware Technical Memorandum

PREPARED FOR

San Gabriel Valley Water Company



PREPARED BY



PLC Hardware RFI Technical Memorandum

Prepared for

San Gabriel Valley Water Company

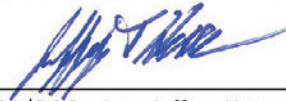
Project No. 671-70-23-10



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09/15/2023

Date



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09/15/2023

Date

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LIST OF ACRONYMS AND ABBREVIATIONS

CIP	Common Industrial Protocol
CPNI	Customer Proprietary Network Information
CPU	Central Processing Unit
DNP3	Distributed Network Protocol
EIP	Ethernet/IP
FWC	Fontana Water Company
HMI	Human Machine Interface
ICS-CERT	Industrial Control Systems Cyber Emergency Response Team
IEC	International Electrotechnical Commission
IPSec	Internet Protocol Security
ISA	International Society of Automation
LAC	Los Angeles County
NIST	National Institute of Standards and Technology
O&M	Operations & Maintenance
ODVA	Open DeviceNet Vendor's Association
OIT	Operator Interface Terminal
OPC UA	OPC Unified Architecture
OT	Operations Technology
PLC	Programmable Logic Controllers
Program	SCADA Improvements Program
RFI	Request for Information
RFQ	Request for Qualifications
SCADA	Supervisory Control and Data Acquisition
SGVWC	San Gabriel Valley Water Company
SI	Systems Integrator
TCP	Transmission Control Protocol
TM	Technical Memorandum



PLC Hardware RFI

1.0 BACKGROUND

San Gabriel Valley Water Company (SGVWC) selected West Yost to develop a Programmable Logic Controller (PLC) Hardware Request for Information (RFI) as a part of the Early Outs Implementation Plan to upgrade the existing SGVWC SCADA system. The Early Outs Implementation Plan contains Early Out Projects which SGVWC can execute prior to the SCADA Implementation Plan. Key drivers for the PLC Hardware RFI project include closing cybersecurity-related gaps and improving SGVWC's cybersecurity posture, minimizing dependence on integrators through proprietary equipment, and providing the required standards needed to maintain the new SCADA system using primarily internal resources.

1.1 Purpose

The purpose of this Technical Memorandum includes an evaluation of the RFI responses and detailed recommendations for PLC Hardware selections for both the Fontana Water Company (FWC) and Los Angeles County (LAC) divisions within SGVWC.

1.2 RFI Development

West Yost and SGVWC each had a list of PLC hardware vendors that the RFI should be distributed to. Admittedly, there was some overlap between West Yost's vendor list and SGVWC's vendor list. The two respective lists were consolidated into a single list which represented the intended recipients of the PLC Hardware RFI.

West Yost developed the PLC Hardware RFI, which consisted of 22 questions developed in close coordination with SGVWC. Following review of the RFI with SGVWC, SGVWC formally issued the RFI to all identified PLC hardware vendors. The questions were grouped into four main categories (resilience, maintainability, supply chain, and reputation) and nine subcategories (solution features, cybersecurity, physical security, innovative technology, service and support, training, programming structure, supply chain, and reputation in the water sector). Questions were weighted at either 100 percent or 200 percent based on key drivers identified for SGVWC. Questions weighted at 100 percent, while important, were not determined to be a key driver for SGVWC in this process. Questions weighted at 200 percent were identified to be key drivers, and therefore made a more significant impact on the vendors' final scores. The RFI questions, along with their weightings, are listed in Table 1. PLC Hardware RFI Questions below.



PLC Hardware RFI

Table 1. PLC Hardware RFI Questions

Subcategory	No.	Weight	Question
Resilience			
Solution Features	1	100	Describe key features of your hardware solution(s), including: Environmental Requirements, CPU Speeds, Types of Communication Modules and Protocols, Power Consumption, Programming Interface for configuration of PLC programs, Different classes of hardware families applicable to the water industry.
Cybersecurity	2	100	How do you identify vulnerabilities? Do you have a proactive approach to rolling out updates or changes?
	3	200	What cybersecurity measures and controls are implemented in your hardware?
Physical Security	4	100	What physical security measures and controls are implemented in your hardware?
Innovative Technology	21	100	Describe your high availability architecture.
	22	100	Describe any emerging technologies your solution provides.
Maintainability			
Service and Support	5	100	Describe tools in your solution to assist in migration from another solution.
	6	100	Describe product support for your hardware. Do you provide 24/7 on call support? Describe the costs associated with this support.
	7	100	Provide a list of system integrators trained and/or certified in your product that provide support in Southern California.
Training	8	200	Describe available training and costs for end users/support staff.
Programming Structure	9	200	Describe the Programming Interface of your hardware solution. Is it proprietary?
	10	100	What programming format does your programming software use (i.e., ladder logic, function block, structured text, etc.)?
	11	200	Would a utility be able to purchase your programming software to bring routine programming activities in-house?
Supply Chain			
Supply Chain and Availability	12	100	Describe your supply chain in terms of security.
	13	200	Describe your supply chain in terms of availability.
	14	200	How quickly can you supply replacement parts to a utility in the state of California?
	15	100	For your controllers, IO modules, and additional required accessories that are most commonly used in the water sector, what is your current lead time for these components?
Reputation			
Reputation in the Water Sector	16	100	How many clients in the US water sector does your company serve?
	17	100	What percentage of water sector users utilize your hardware?
	18	200	What differentiates your hardware from other vendor's solutions?
	19	100	Describe any industry safety, security, regulatory, and performance standards to which your product has been designed.
	20	200	Do you have any client references within the Southern California region?



PLC Hardware RFI

West Yost and SGVWC established a list of 17 vendors to distribute the RFI to; this was developed using SGVWC's existing list of intended vendors in addition to reputable vendors identified by West Yost:

- ABB
- Bosch
- Delta Electronics
- Eaton
- Emerson Electric Co.
- Hitachi
- Honeywell
- Maple Systems
- Mitsubishi Electric
- Moxa
- Omron
- Rockwell/Allen-Bradley
- Schneider Electric
- Siemens
- Tesco
- Toshiba
- Yokogawa Electric

The vendors were given approximately 3 weeks to submit a response to the RFI.

1.3 Evaluation Process

Out of the 17 vendors that the RFI was distributed to, 5 submitted responses. Those responses included: Maple Systems, Honeywell, Tesco, Schneider Electric (Modicon), and Rockwell Automation (Allen Bradley). West Yost evaluated the vendors' responses to each question on a scale from 0–5. A score of 0 means the vendor response failed to meet the objective, a score of 3 means the vendor response meets the objective to some degree, and a score of 5 represents an exceptional response.

West Yost used the weighted scores in the evaluation process, as these scores more closely aligned with the key drivers and needs of SGVWC. The total max weighted score for the RFI was valued at 150. This value was compared against Vendor responses to evaluate strength of responses.

2.0 PLC HARDWARE RFI RESULTS

The vendor responses and evaluation thereof are outlined in the sections below for each vendor that responded to the RFI.

2.1 Maple Systems

Maple Systems provided a response regarding their PLC controllers. The response received a weighted score of 24/150 and was generally sparse and did not meet the objectives, see Figure 1. Maple Systems Score. The evaluation of Maple Systems' strengths and weaknesses is outlined in the sections below.

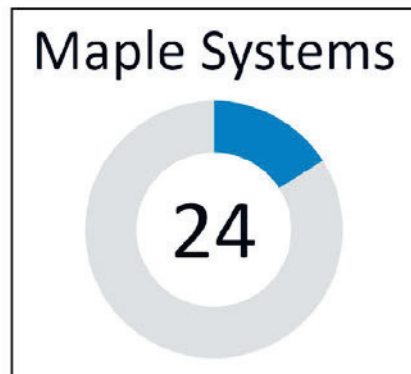


Figure 1. Maple Systems Score

2.1.1 Strengths

The lead times for replacement parts for Maple Systems PLCs are typically short. Replacement parts can be received in 3-4 days for most parts. For out of stock and non-obsolete items, the lead times are typically no longer than 10-12 weeks.

2.1.2 Weaknesses

The resilience of Maple Systems PLC controllers did not meet expectations or standards. Regarding cybersecurity and resilience, Maple Systems does not employ a proactive approach to identifying and patching vulnerabilities; there were also no cybersecurity controls or measures identified in their response. The Maple Systems controller architecture also does not employ a high-availability architecture which aids in resilience of critical processes to failures such as power outages and loss of communications. Additionally, there was no identification of emerging technologies or differentiators employed in their controllers.

Regarding the maintainability of the controllers, Maple Systems does not provide many opportunities for support or training. Maple Systems did not provide a list of system integrators and only offers end users free technical support Monday-Friday 7:00 AM to 4:30 PM, which does not account for failures that often occur outside of these hours. Maple Systems also does not provide training to end users and explains they only offer free technical support to answer programming questions. This is because their software is proprietary and will inhibit SGVWC from conducting routine programming maintenance in-house.

2.2 Honeywell

Honeywell provided a response regarding their Control Edge PLC. The response received a weighted score of 61/150 and generally did not meet expectations, see Figure 2. Honeywell Score. The evaluation of Honeywell's strengths and weaknesses is outlined in the sections below.

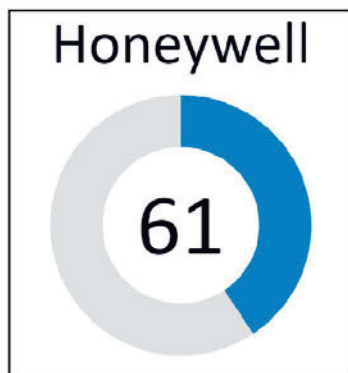


Figure 2. Honeywell Score

2.2.1 Strengths

Honeywell's programming software, Control Builder, can be licensed to allow end-users to conduct routine programming activities in-house. Additionally, Honeywell provides Control Edge PLC Training online within their Digital University.

The Control Edge PLC also provides sufficient connectivity through various protocols such as OPC UA, MQTT, HART-IP, PROFINET, Ethernet/IP, DNP3, and Modbus TCP/IP.

2.2.2 Weaknesses

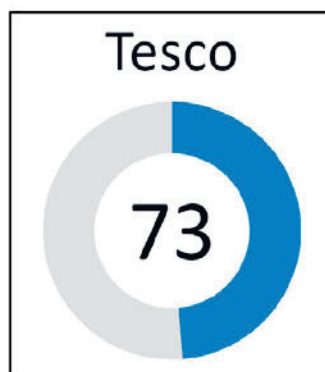
The response fell short in several categories. Regarding Honeywell's supply chain, the security and availability of PLC components and modules is not clear and cannot be vetted.

For technical support, detailed options and costs were not provided. It does not appear that Honeywell provides in-person support for their controllers and only two system integrators were listed.

The Honeywell Control Edge PLC also does not appear to employ a high availability architecture, which limits a system's resilience to failures.

2.3 Tesco

Tesco provided a response regarding their Tesco-branded PLCs. The response received a weighted score of 73/150 and was generally evaluated to meet the objective to some degree, see Figure 3. Tesco Score. The evaluation of Tesco's strengths and weaknesses is outlined in the sections below.

**Figure 3. Tesco Score**

2.3.1 Strengths

Tesco states that they have a rather large presence in the water sector as they support approximately 3,000 to 3,500 clients, or 8-10 percent of the water sector.

Regarding supply chain availability, Tesco currently maintains 10 years of PLC components such as L2000 and L3000 processors, I/O, and operator faceplates. For additional components not in stock, Tesco maintains a 3-5 business day lead-time to provide those parts.

Tesco also provide end users with four levels of training: Operator/User, Maintenance, Troubleshooting, and Programmer. Onsite Tesco training is tailored to customer needs and is available from \$5,000 to \$10,000 per week for up to eight students, depending on training level desired. Tesco also provide customers with several levels of support which are: Spare-In-The-Air Support Program, PLC Application Program Backups on File at Factory (gratuitous service), 24/7 Support, and Optional Support Contracts. Costs related to these support options were not included.

Upon request, Tesco will furnish a copy of the PLC programming software to end users for Tesco manufactured PLC's at no additional cost. PLC programming is also supported by a list of four local system integrators, which were included in Tesco's RFI response.

2.3.2 Weaknesses

Tesco's PLCs did not meet the objective regarding cyber and physical resilience; Tesco does not design their controllers to comply with any cybersecurity measures/controls or physical measures/controls, although they offer a range of options to ensure the secure transmission of telemetry messaging. Tesco did not answer questions regarding their controllers' network architecture or the use of a high availability architecture; additional cut sheets that were included did not offer more detail on the topic. Additionally, there is no mention of emerging technologies or distinguishable features from others. Tesco also did not answer the RFI question pertaining to industry safety, security, regulatory, and performance standards to which their product has been designed.

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Regarding Tesco's supply chain, there was no information included for the security of parts and components other than the use of proprietary supply chain controls. This response did not clearly define any of the controls that Tesco puts in place.

Additionally, Tesco PLC software can only be supported by a small pool of integrators whereas PLC software for other larger vendors (i.e. Schneider Electric, Rockwell Automation, etc.) can be supported by a more extensive list of integrators.

2.4 Schneider Electric (Modicon)

Schneider Electric provided a response regarding their Modicon ePACs (Ethernet Programmable Automation Controllers). The response received a weighted score of 101/150 and generally met or exceeded expectations, see Figure 4. Schneider Electric Score. The evaluation of Schneider Electric's strengths and weaknesses is outlined in the sections below.

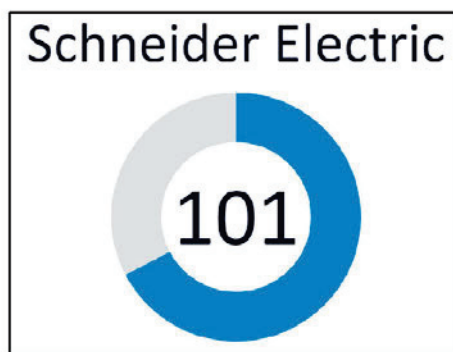


Figure 4. Schneider Electric Score

2.4.1 Strengths

Schneider Electric is one of the leading PLC hardware vendors, as they support approximately 39 percent of water/wastewater users. Southern California utility references include Irvine Ranch Water District, California Department of Water Resources, and Sweetwater Authority.

The Modicon ePACs perform very well in terms of resilience. Schneider Electric employs a very thorough vulnerability management policy, as well as a chain of reliability, to identify and address cybersecurity vulnerabilities. The ePACs are also International Society of Automation (ISA)/International Electrotechnical Commission (IEC) 62443-4-2 compliant and Achilles Level 2 certified. Modicon also implements the following cybersecurity measures and controls in their hardware: Firmware Encryption & Integrity Check, Secured Operations Mode, and Traceability. They also employ secured communications for Internet Protocol Security (IPSec), OPC Unified Architecture (OPC UA), and Distributed Network Protocol 3 (DNP3).



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The Modicon ePACs use a resilient high availability architecture and employ a hot-standby system; these controllers are designed for seamless failovers and avoid a single point of failure. This is achieved through their redundant standard Central Processing Units (CPUs) and redundant communication modules for Ethernet/IP (EIP), Modbus Transmission Control Protocol (TCP), OPC UA, DNP3, and Profibus. Several of Modicon's communication modules comply with IEC 61850 and IEC 60870-5-101/104. In addition, Modicon controllers provide some other emerging technologies such as the implementation of the Hot-Standby configuration, IPSec, secured communications, and IP forwarding over OPC UA.

Schneider Electric provides support for their controllers through two different avenues: Advanced Priority Support is provided weekdays (M-F) from 8:00 AM to 5:00 PM, while Premier Support is provided 24/7 (holidays included) with a 30-minute service guarantee. Schneider Electric provides multiple levels of training such as three-day Control Expert Level 1 remote training at \$1,815 per person and a three-day Control Expert Level 2 on-site training at \$12,600 for a maximum of 10 people. Additionally, a list of 10 system integrators who are trained and/or certified in the product was provided.

Schneider Electric controllers utilize the EcoStruxure Control Expert programming software. End users are also able to license this software to conduct routine programming activities in-house, rather than relying on a 3rd party.

Schneider Electric maintains rather quick lead times, less than 60 business days for parts, and has standardized processes to expedite materials for all customers.

2.4.2 Weaknesses

While the availability of Schneider Electric's supply chain is impressive, there was an absence of information provided regarding security. Primary and critical components are manufactured at Schneider-owned facilities and 3rd party products are subject to a QA/QC process, but there is minimal information regarding these processes and any control or measures put into place. Additionally, Modicon controllers do not have physical security controls and instead rely on other devices and control panel security to protect the PLC.

2.5 Rockwell Automation (Allen Bradley)

Rockwell Automation provided a response regarding their Logix Controllers. The response received a weighted score of 109/150 and generally met or exceeded expectations, see Figure 5. Rockwell Automation Score. The evaluation of Rockwell Automation's strengths and weaknesses is outlined in the sections below.

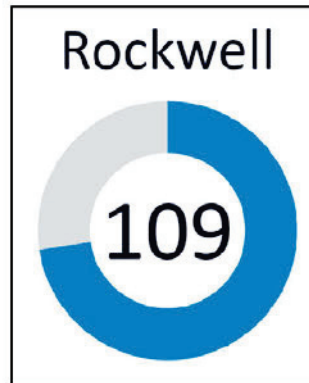


Figure 5. Rockwell Automation Score

2.5.1 Strengths

Rockwell Automation is the largest PLC hardware vendor, as they claim to support approximately 60 percent of water/wastewater users in using their hardware. Southern California utility references include Inland Empire Utilities Agency, Indian Wells Valley Water District, and Eastern Municipal Water District.

The Logix Controllers also perform very well in regards to resilience. The Logix Controllers comply with various cybersecurity and physical security controls/measures. The Logix Controllers are compliant with ISA/IEC 62443-4-2, ICS-CERT (Industrial Control Systems Cyber Emergency Response Team) and Customer Proprietary Network Information (CPNI). Allen-Bradley communication modules also support Open DeviceNet Vendor's Association (ODVA) Common Industrial Protocol (CIP) Security. The Logix Controllers implement physical security controls and are IEC-62443 compliant, which exceeds National Institute of Standards and Technology (NIST) 800-82-R2. Rockwell Automation follows a thorough Vulnerability Policy which describes how the organization receives, tracks, investigates, assesses, and discloses security vulnerabilities.

They also employ a high availability architecture built throughout the entire Industrial Automation Control System (IACS). In reference to the Purdue Model (ISA-99), Allen-Bradley supports controller redundancy at Level 1 (Basic Control) and I/O redundancy at Level 0 (The Process). See Figure 6. Purdue Model below.

PLC Hardware RFI

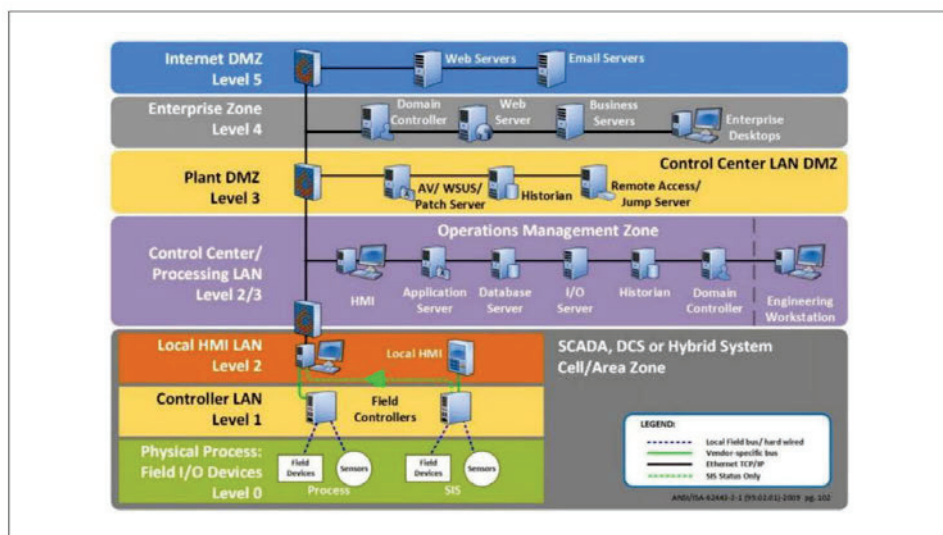


Figure 6. Purdue Model

Rockwell Automation also provides several avenues for end users to receive training and support. The training options include instructor led courses starting at \$1650, private delivery courses starting at \$15,000, and learning+ courses starting at \$1200 or \$775 with an annual contract. Technical support is offered with four different options: self-assist, product, system, and application levels; 24/7 on-call support is provided at the product, system, and application levels. The response also included four Southern California system integrators who are available to provide additional support.

Allen-Bradley controllers utilize the Studio5000 Logix Designer Software. This programming software can be licensed by end-users and utilized to conduct programming activities in-house.

In terms of supply chain, Rockwell Automation has robust internal controls put in place to manage supply chain risk such as product and solution security, anti-counterfeiting controls, resiliency, and cyber risk to operational technology (OT).

2.5.2 Weaknesses

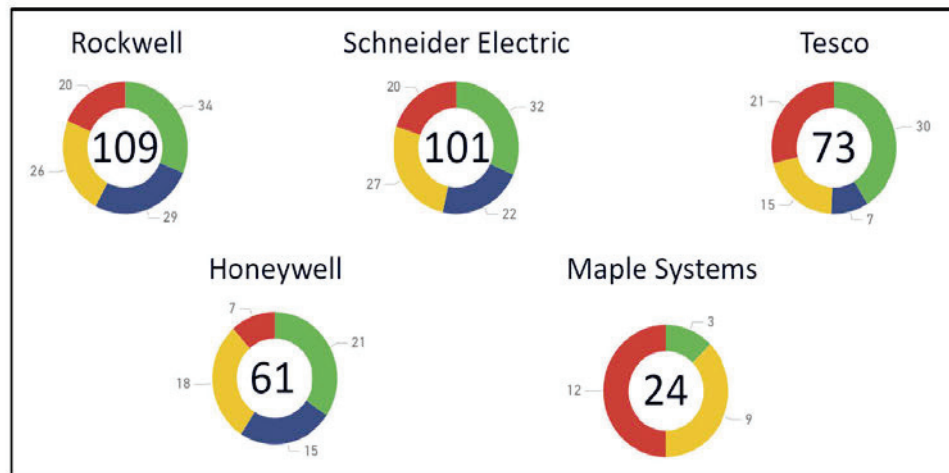
Although Rockwell Automation has impressive controls put in place to minimize supply chain risk, lead times for PLC controllers range from 43-159 days and lead times for I/O modules range from 17-216 days. These high lead times may be an issue when a project needs to meet certain time constraints.

3.0 RECOMMENDATION

The following section addresses the recommendation related to PLC controller hardware based on options evaluated with SGVWC.

SGVWC staff held an internal meeting to review the results following West Yost's RFI evaluation process. During this meeting, SGVWC Staff reviewed the materials and scoring sheets provided by West Yost.

The decision of which hardware solution to implement is a strategic decision that will have a company-wide impact. SGVWC had determined that their key drivers are supply chain availability, service and support, cybersecurity, and reputation in the water sector. Rockwell Automation (Allen-Bradley) controllers are well supported through means of training opportunities, system integrators, and Rockwell technical support. The Allen-Bradley Logix controllers also have robust cybersecurity features and comply with standard cybersecurity controls. Additionally, Rockwell Automation has the largest footprint in the water and wastewater sector and make up the majority of hardware used by utilities. For the reasons above, and due to Rockwell receiving the highest score, SGVWC Staff have unanimously decided to proceed with the Allen-Bradley (by Rockwell Automation) hardware solution. See Figure 7. Score Summary by Category to comparatively view each vendor response's score.



● Maintainability ● Reputation ● Resilience ● Supply Chain

Figure 7. Score Summary by Category



4.0 NEXT STEPS

With the decision to move forward with Allen-Bradley (by Rockwell Automation) PLCs, it is important that PLC hardware is implemented consistently across all sites within FWC and LAC. This will greatly help SGVWC with key considerations such as maintenance and storage of spare parts.

To this end, West Yost recommends the following next steps to be executed in the order shown below:

1. **Develop PLC hardware specification.** This specification should identify PLC hardware functional requirements for small, medium, and large sites. This specification will align with PLC product families (i.e., Allen Bradley CompactLogix, ControlLogix, etc.), while not including specific part numbers since part numbers are constantly changing and becoming obsolete. This specification will provide sufficient guidance to SGVWC and their vendors and consultants to implement PLC hardware consistently across various site types and projects.
2. **Develop System Integrator (SI) Request for Qualifications (RFQ).** West Yost recommends that SGVWC develop an RFQ for SCADA integration support. The RFQ is aimed at prequalifying integrators and consultants who can provide SCADA integration services. This will, in turn, diversify SGVWC's pool of SCADA resources to augment internal SCADA support staff and to provide support during emergency situations.
3. **Hire SCADA Technician for each division (FWC and LAC).** With a strategic decision being made with regards to PLC hardware, a key next step will be to hire a SCADA technician for each division. When executed in conjunction with Next Step 2 outlined above, SGVWC will have a good support model for maintaining PLC hardware long-term. This approach generally includes leveraging prequalified firms for SCADA integration on Capital projects, while leveraging an in-house SCADA technician for routine changes and updates as well as for PLC support on smaller Operations & Maintenance (O&M) projects.

**Attachment 1-6: SGVWC PLC Los Angeles County Division
REVISED TGE-013 b.ii.xls**

San Gabriel Valley Water Company's PLC - Los Angeles County Division

Site	Current Model	Serial No.	Current Install Date	Reason For Replacement	Proposed New Model	Proposed Install Date	Estimated Cost (\$)	Priority Control
Plant No. 1	L3000	18416	2020	See Note No.1	Allen Bradley CompactLogix	2028	\$20,000	See Note No.4
Plant No. 1	L3000	18416	2008	See Note No.1	Allen Bradley CompactLogix	2028	\$20,000	See Note No.4
Plant No. 2	L3000	18417	2020	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant No. 2	L3000	18417	2008	See Note No.1	Allen Bradley CompactLogix	2028	\$20,000	See Note No.4
Plant No. 6	LIQ 5	8061	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant No. 6	L3000	14448	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant No. 7	L3000	14783	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant No. 7	L3000	14538	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant No. 8	L3000	17908	2020	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant No. 8	CompactLogix 3 MB Motion Controller	55958745	Unknown	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant No. 11	L3000	18415	2020	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant No. 11	L3000	18413	2020	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant No. 12	LIQ 5	8072	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant No. 12	L3000	14427	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant No. 13	LIQ 5	8063	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant No. 13	L3000	Unknown	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant No. 14	LIQ 5	8065	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant No. 14	L3000	14425	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant B1	LIQ 5	8042	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant B1	L3000	14503	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant B4	LIQ 5	8076	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant B4	L3000	14424	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant B5	LIQ 5	8032	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B5	L3000	14423	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B5	Allen Bradley Panelview Plus 7	2711P-PR	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B5	Power Panel	1141P5501	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B5	Allen Bradley Panelview Plus	2711P-RP2	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B6	L2000	12523	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B6	L2000	12653	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B6	L2000	14782	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B6	CompactLogix 3 MB Enet Controller	74276113	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B6	CompactLogix 2 MB Enet Controller	74276182	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B6	Allen Bradley Panelview Plus 7	74888835	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B7	L3000	14603	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B7	LIQ 5	8038	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant B9	LIQ 5	8059	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant B9	L3000	14604	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant B11	LIQ 5	8060	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant B11	L3000	14611	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant B12	LIQ 5	8077	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B12	L3000	14607	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B14	LIQ 5	8082	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B14	L3000	14608	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B15	LIQ 5	8071	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B15	L3000	14461	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B17	LIQ 5	8051	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B17	L3000	14606	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant B18	LIQ 5	8068	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B18	L3000	Unknown	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B19	LIQ 5	8069	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B19	L3000	14446	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B20	LIQ 5	8070	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B20	L3000	14612	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B24	L2000	13200	2008	See Note No.1	Allen Bradley CompactLogix	2026	\$20,000	See Note No.4
Plant B25	L2000	12652	2008	See Note No.1	Allen Bradley CompactLogix	2028	\$20,000	See Note No.4
Plant B26	L2000	12653	2008	See Note No.1	Allen Bradley CompactLogix	2028	\$20,000	See Note No.4
Plant B27	L2000	17022	2010	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant G3	LIQ 5	8040	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant G3	L3000	14466	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant G4	L3000	18414	2020	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant G4	L3000	18415	2020	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant G5	LIQ 5	8039	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant G5	L3000	14504	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant G6	LIQ 5	8064	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant G6	L3000	14465	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant M1	LIQ 5	8034	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant M1	L3000	14498	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant M2	L2000	13701	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant M2	L3000	Unknown	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant M3	L3000	18913	2021	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant M3	L3000E	18918	2021	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant M4	LIQ 5	8036	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant M4	L3000	14500	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant M5	LIQ 5	8037	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant M5	L3000	14501	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant M6	L3000	15802	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant M6	L3000	15802	2008	See Note No.1	Allen Bradley CompactLogix	2025	\$20,000	See Note No.4
Plant M7	L2000	14539	2021	See Note No.1	Allen Bradley CompactLogix	See Note No.5	\$20,000	See Note No.4
Plant M7	L3000	19175	2021	See Note No.1	Allen Bradley CompactLogix	See Note No.5	\$20,000	See Note No.4
Plant W1/W8	L3000	18414	2008	See Note No.1	Allen Bradley CompactLogix	2024	\$20,000	See Note No.4
Plant W1/W8	L3000	18413	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant W6	L3000	18095	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant W6	CompactLogix 3 MB Motion Controller	69151827	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4

Plant W7	L3000	Unknown	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Plant W7	UQ 5	8066	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4
Cal Domestic	UQ 5	17795	2008	See Note No.1	Allen Bradley CompactLogix	2027	\$20,000	See Note No.4

Notes:

No. 1) As outlined in the SCADA Technical Memorandum - Age of PLC, and/or limited system integrator support due to required proprietary PLC software, eliminate dependency on current provider Tesco, improve cyber resilience with newer PLCs having the latest patches, updates and cyber security features, SGVWC SCADA Technician can complete programming, repairs, and maintenance.

No. 2) Proposed Install Date- Based off of SCADA TM Appendix I (IAC SCADA Program Implementation Plan). Installation date will be adjusted accordingly pursuant to rate case budget approval.

No. 3) Estimated cost for PLC controller only. For each complete site SCADA project cost and detail refer to Exhibit SG-6 (Swift) Confidential Attachment L SCADA Technical Memorandum.

No. 4) The replacement of PLCs will allow for multiple Priority Control projects, outlined in Appendix G Cyber-RAA, that pertain to programming and security to be implemented.

No. 5) Plant M7 was under construction, prior to the SCADA Technical Memorandum and was equipped with Tesco PLCs.

LIST OF ATTACHMENTS FOR CHAPTER 2

#	Attachment #	Description
1	2-1	CONFIDENTIAL Response to TGE-010
2	2-2	LA Division Site Visit Photos
3	2-3	CONFIDENTIAL Attachment D – 2024.2025 GRC Positions Evaluation
4	2-4	CONFIDENTIAL Response to TGE-009
5	2-5	Water Resources Project Manager Job Description
6	2-6	SGVWC Blank Employee Performance Appraisal Form
7	2-7	CONFIDENTIAL Response to TGE-016
8	2-8	TGE-007 Attachment B LA Division Outside Services from 2020-2024
9	2-9	TGE-007 Attachment C Regulations from 2015-2024
10	2-10	CONFIDENTIAL TGE-012 Attachment D PA NO.2017PA-Schools and AB 746 Staff Hours
11	2-11	EPA Rules for PFAS
12	2-12	Department of Drinking Water Rulemaking Status for Cadmium, Mercury, Styrene, and Arsenic
13	2-13	LA Division Water Resources Manager
14	2-14	CONFIDENTIAL Response to TGE-007
15	2-15	CONFIDENTIAL Response to TGE-012

CONFIDENTIAL Attachment 2-1: Response to TGE-010

SAN GABRIEL VALLEY WATER COMPANY

April 1, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: **Response to Data Request No. TGE-010 (Facilities Maintenance Supervisor)**

Dear Mr. Aslam:

In response to your data request dated March 25, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

Please refer to SGVWC application file "EXHIBIT SG-7 (Zielke).pdf," Attachment Q at pdf pages 436 to 443. Attachment Q discusses SGVWC's request for a new Facilities Maintenance Supervisor position in the Los Angeles County (LAC) division. Please answer the following questions.

- a. What are the adverse impacts to SGVWC if the new Facilities Maintenance Supervisor position in LAC division is not approved for this General Rate Case (GRC)? Please explain in detail.
- b. How will any changes and improvements that result from the implementation of this new Facilities Maintenance Supervisor position be measured? Please explain in detail. Please also provide any documentation that supports these measured changes and improvements.
- c. Did SGVWC request a new Facilities Maintenance Supervisor position in LAC division in the last GRC, or in any other prior GRCs? If the answer is "yes," please provide the relevant CPUC Application and Decision numbers for which SGVWC requested this new position. If the answer is "no," please explain in detail why SGVWC did not request a new Facilities Maintenance Supervisor position in LAC division in the last GRC or in any other prior GRCs.

RESPONSE NO. 1:

- a. Not approving the Facilities Maintenance Supervisor position in the LAC division would continue to require the current Facilities Maintenance Superintendent to attempt to complete the required essential supervisory functions of both the Supervisor and Superintendent. This is, and would remain, the only Superintendent position burdened with completing both the Superintendent and Supervisor roles, as all other operations departments in the Company, including the FWC division's Facilities Maintenance department, have both a Superintendent and Supervisor.

Not approving the position increases the risk of the Company violating safety, regulatory, compliance, code enforcement, or administrative standards resulting in possible injury, fines, and lack of maintenance to critical water supply facilities. These concerns are detailed in "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, at pdf page 438.

The LAC Facilities Maintenance department will continue to lack sufficient coverage and supervision for vacations and sick times, or in a worst-case scenario, an extended absence of the current Superintendent. The department Superintendent will continue to be required to fulfill both the Superintendent and Supervisor roles without being able to fully conduct the necessary oversight of either, which increases the risk of not complying with regulations and safety standards.

The purpose of staffing both a Superintendent and Supervisor is to allow the Superintendent to focus on administrative work such as contract management, reporting preparation and submittals, budgeting, and department personnel including hiring and disciplinary actions, while the Supervisor's primary focus is managing staff in the completion of daily work assignments, safety compliance, meeting with City, County and other regulatory inspectors, and performing job walks with contractors to obtain proposals for work that cannot be completed by staff. The distribution of the supervisory requirements for each of these positions cannot be met by only a Superintendent.

The LAC Facilities Maintenance Superintendent would further be required to continue conducting all of the administrative requirements of the department, as well as field oversight, resulting in a clear supervision deficiency that can potentially result in safety violations, code violations, and possible hazards. The Facilities Maintenance department plays a critical role in maintaining the Company's existing and newly acquired and constructed system plants, structures, and parcels to extend the useful life of these facilities. Lack of adequate supervision and managerial oversight may result in the need to increase contracted/outside services, in order to keep pace with current and future department obligations.

This operations department supervision structure, consisting of one Superintendent and one Supervisor, ensures the department and Company maintain compliance with regulations and ordinances, meets productivity goals, including the proper maintenance of assets. This supervision structure has been proven successful in all other Company operations

departments. Moreover, the CPUC has historically supported this supervision structure in previous similar staffing requests.

- b. The request for the LAC Facilities Maintenance Supervisor is predicated on meeting the current and future supervisory needs and requirements of the department, and to ensure all regulatory compliance, safety measures and best management practices are being met.

SGVWC maintains focus on overall job performance and outcomes. Meeting overall department needs, goals, and continuing to ensure all regulatory compliance, safety measures and best management practices are being met, are the metrics that prove the success of the position. The Supervisor's annual Employee Performance Appraisals are where this will be documented.

- c. No.

The Company utilized the available staff to assure compliance in all areas. However, as a result of the growth detailed in "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, along with the acquisitions of the South Montebello and Rurban Homes Mutual Water Company systems, added ongoing maintenance of these assets is required by the LAC Facilities Maintenance department. As such, the Superintendent alone for LAC's Facilities Maintenance department cannot confidently continue to fully meet all supervisory requirements to ensure compliance, goals, objectives, and safety for the department are fully met.

RESPONDING WITNESSES: Zielke

REQUEST NO. 2:

In "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, on pdf page 436, SGVWC writes, "Additionally, the Company only recently appointed the first Superintendent of the Department in July of 2024." Also, in SGVWC application Excel Workpaper "GRCWorkpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4," line 282 shows an approved Facilities Maintenance Superintendent position filled by [REDACTED] in LAC division. Please answer the following questions.

- a. Please provide the exact starting date when [REDACTED] began working as the Facilities Maintenance Superintendent position for LAC division.
- b. Please provide the relevant CPUC Application and Decision numbers for when the Facilities Maintenance Superintendent position was created and approved for the LAC division.
- c. Why did SGVWC only recently appoint the "first Superintendent of the Department in July of 2024"? Please explain in detail.

- d. Please explain in detail how SGVWC completed the various duties and administrative responsibilities of the Facilities Maintenance Superintendent as described in "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, on pdf page 438, prior to the appoint of the first Superintendent of the Facilities Maintenance Department in July 2024?
- e. In "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, at pdf pages 437 to 438, SGVWC also writes, "Currently the Facilities Maintenance Superintendent is required to conduct both all of the administrative requirements of the Department and the field inspections and oversight." SGVWC also lists and describes on pdf page 438 the job responsibilities of the Facilities Maintenance Supervisor. SGVWC writes, "The Supervisor, oversees a majority of field related responsibilities."
 - i. Prior to the appointment of LAC division's Facilities Maintenance Superintendent in July 2024, how did SGVWC complete field inspections, oversight, and the other job responsibilities of the Facilities Maintenance Supervisor as described in "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, at pdf page 438?
- f. Does the LAC division Facilities Maintenance Superintendent conduct any work, job duties, and responsibilities in the Fontana division? Please explain in detail.
- g. If the answer to Question 2f is "yes," please provide for the Facilities Maintenance Superintendent position in a tabulated Excel spreadsheet the number of hours worked by month at each Fontana division and LAC division for each year from 2020 through 2024. Please provide two separate tabulated Excel spreadsheets or worksheet tabs for the Fontana and LAC divisions.

RESPONSE NO. 2:

- a. This employee was formally promoted from Facilities Maintenance Supervisor to Facilities Maintenance Superintendent on June 15, 2024.
- b. The position of LAC Facilities Maintenance Superintendent was not requested in a previous CPUC application. SGVWC promoted the existing Facilities Maintenance Supervisor [REDACTED] to the position of Facilities Maintenance Superintendent as a result of his exceptional performance as Supervisor, and the need to have a designated individual in place to assist with responding to the administrative responsibilities in the department that are normally completed by the Superintendent of the department, as is the Company's practice in all other operations departments. [REDACTED] promotion to Superintendent did not result in any staff additions to the LAC Facilities Maintenance department.
- c. SGVWC appointed a Facilities Maintenance Superintendent in July of 2024 because:

- The Company's increase in structures, plants, and owned parcels since 2004 has outpaced the Department's staffing additions, resulting in a lack of available staff to provide oversight related to the maintenance and repair these assets. The Facilities Maintenance Superintendent was needed to meet the Company's goal of continued compliance with all associated regulations such as city and county weed abatement notices, and other code enforcement policies and regulations pertaining to Company plants and parcels.
 - The Company's Facilities Maintenance department had not increased staffing since 2004 when a Facilities Maintenance Technician I was approved by the California Public Utilities Commission ("CPUC"), decision A.04-09-005 (D.05-07-044).
 - The absence of a dedicated Superintendent resulted in the Supervisor being required to focus on the administrative duties of the department to keep pace with the administrative workload. As with other departments it is the Superintendent who oversees the administrative responsibilities as described in "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, on pdf page 438.
 - To prepare for the LAC Facilities Maintenance department to have in place the same supervisory structure as the FWC Facilities Maintenance department, which has a CPUC approved Superintendent and Supervisor.
 - To recognize [REDACTED] exceptional performance as Supervisor.
- d. SGVWC attempted to complete the various duties and administrative responsibilities of the Facilities Maintenance Superintendent as described in "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, on pdf page 438, prior to the appoint of the first Superintendent of the Facilities Maintenance Department in July 2024, by initially utilizing the LAC Operations Manager with the assistance of the Facilities Maintenance Supervisor.
- e. (i.) Prior to the appointment of LAC division's Facilities Maintenance Superintendent in July 2024, the field inspections, oversight, and other job responsibilities of the Facilities Maintenance Supervisor as described in "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, at pdf page 438 were completed by the then Facilities Maintenance Supervisor.

However, the same Facilities Maintenance Supervisor was also required to simultaneously assist in overseeing and completing the administrative responsibilities of the Facilities Maintenance Superintendent as described in "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, on pdf page 438.

Currently, the Facilities Maintenance Superintendent is required to conduct both the administrative requirements of the department and the field inspections and oversight. This is not consistent with other operations departments. In all other Company operations departments, there is both a Superintendent and Supervisor position for the same reasons and needs that a Superintendent and Supervisor are needed in the LAC Facilities Maintenance department.

Approval of this request will resolve the deficiency existing in supervision within the department and will match that of each of the other operation departments. The LAC Facilities Maintenance department will then have sufficient coverage and supervision for vacations and sick time. This will also provide for having a Superintendent to oversee the administrative responsibilities as described in "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, at pdf page 437 and 438, and a Supervisor to oversee duties as described in "EXHIBIT SG-7 (Zielke).pdf," Attachment Q, at pdf page 438.

f. No

g. Not applicable, see response to (f.)

RESPONDING WITNESSES: Zielke

REQUEST NO. 3:

Please refer to SGVWC application Excel Workpaper "GRCWorkpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4," lines 417 and 418. Line 417 shows an approved Facilities Maintenance Superintendent position filled by "Rodriguez, Jaime J." in the Fontana division. Line 418 shows an approved Facilities Maintenance Supervisor position filled by "Frye, Michael" in the Fontana Division. Please answer the following questions.

- a. Do the Fontana division Facilities Maintenance Superintendent and Facilities Maintenance Supervisor conduct any work, job duties, and responsibilities in the LAC division? Please explain in detail.
- b. If the answer to Question 3a is "yes," please provide for the Facilities Maintenance Superintendent position in a tabulated Excel spreadsheet the number of hours worked by month at each Fontana division and LAC division for each year from 2020 through 2024. Please provide two separate tabulated Excel spreadsheets or worksheet tabs for the Fontana and LAC divisions.
- c. If the answer to Question 3a is "yes," please provide for the Facilities Maintenance Supervisor position in a tabulated Excel spreadsheet the number of hours worked by month at each Fontana division and LAC division for each year from 2020 through 2024. Please provide two separate tabulated Excel spreadsheets or worksheet tabs for the Fontana and LAC divisions.
- d. Please provide the relevant CPUC Application and Decision numbers for when the Facilities Maintenance Superintendent position was created and approved for the Fontana division.
- e. Please provide the relevant CPUC Application and Decision numbers for when the Facilities Maintenance Supervisor position was created and approved for the Fontana division.

Mehboob Aslam
Response to TGE-010

-7-

April 1, 2025

RESPONSE NO. 3:

- a. No
- b. Not applicable, see response to 3.a.
- c. Not applicable, see response to 3.a.
- d. Subsequent to Application 22-01-003 and Decision 24-03-005, Jaime Rodriguez, the Facilities Maintenance Supervisor at that time, was promoted to the position of Facilities Maintenance Superintendent.
- e. Application 22-01-003 and Decision 24-03-005.

RESPONDING WITNESSES: Zielke

Please call me at (626) 448-6183 with any questions regarding this information.

Sincerely,

/s/ Joel M Reiker

Joel M. Reiker
Vice President, Regulatory Affairs

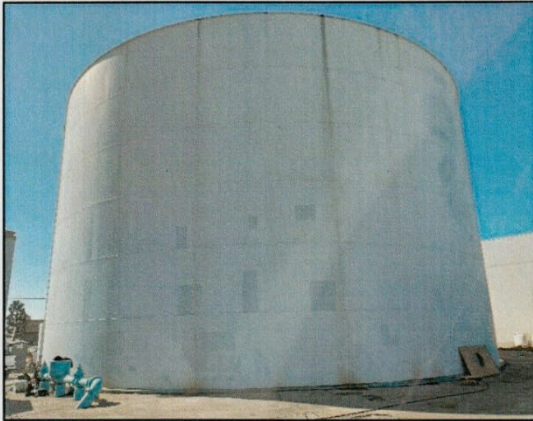
Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)

/encl.

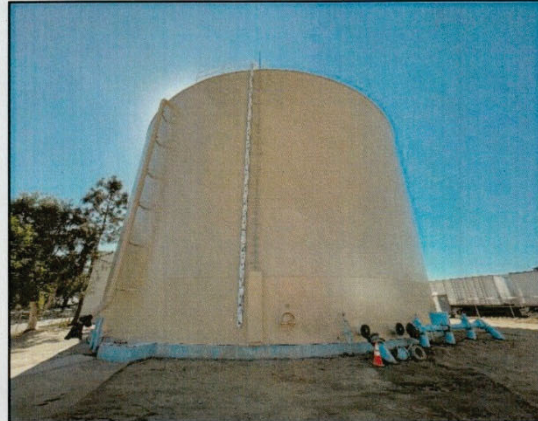
Attachment 2-2: LA Division Site Visit Photos

**San Gabriel Valley Water Company
2025 General Rate Case Plant Tour
February 20, 2025**

Plant M12 – Existing Site Conditions



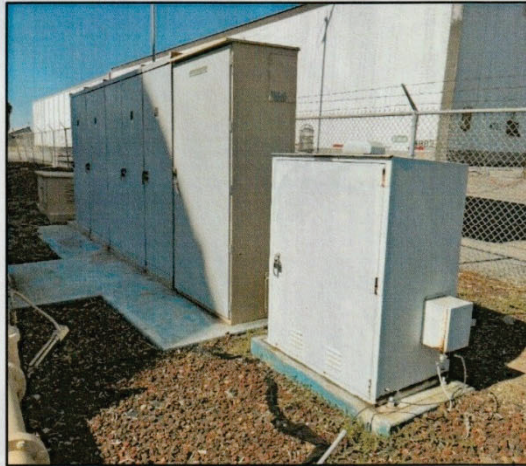
Existing Reservoir (before recoating)



Existing Reservoir (after recoating)

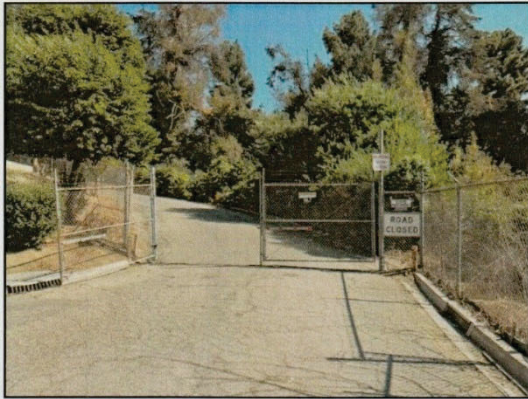


Existing Booster Station (to be replaced)

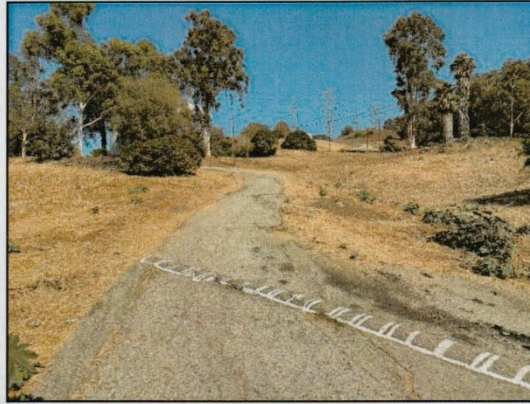


Existing Electric Panels

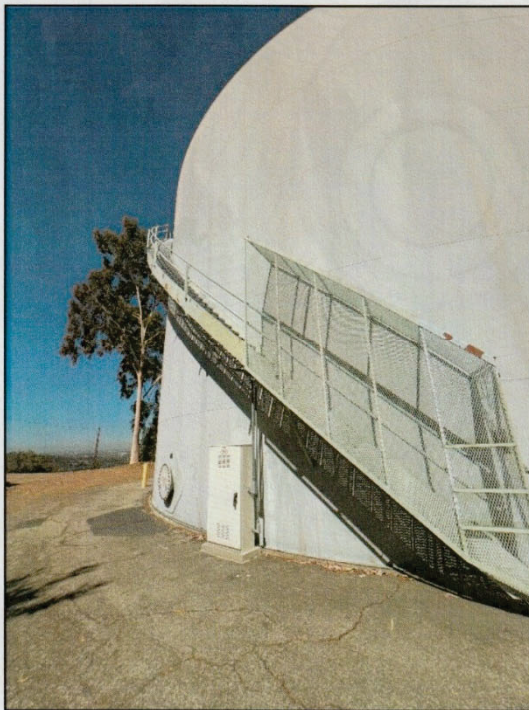
Plant No. 7 – Existing Site Conditions



Existing entry gate



Existing access road



Existing Plant No.7 reservoir

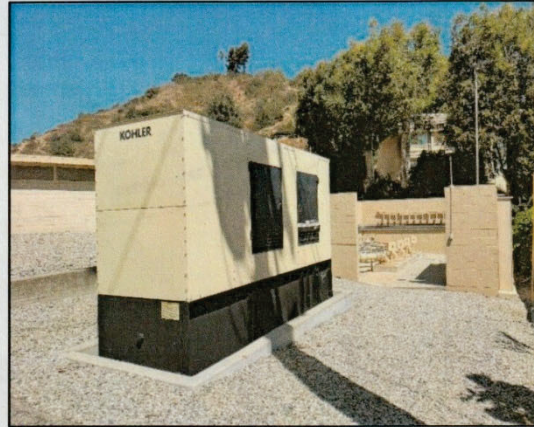


Existing hillside for the proposed reservoir.

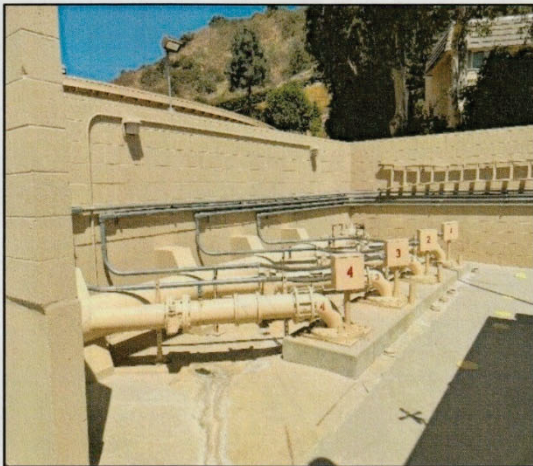
Plant B14 – Existing Site Conditions



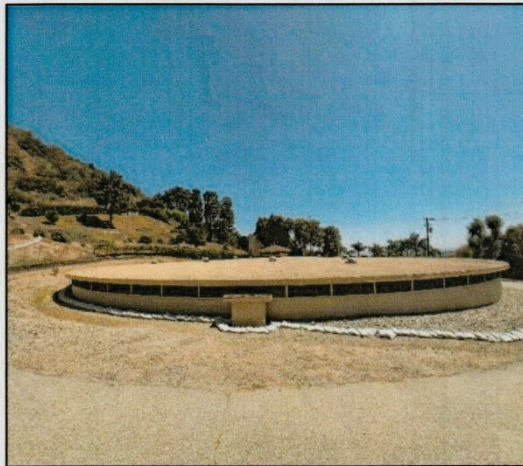
The existing chain link fence is old and will be removed when the site is graded for the second reservoir.



Existing generator

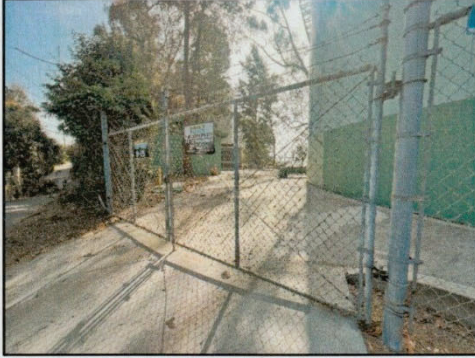


Existing pump station

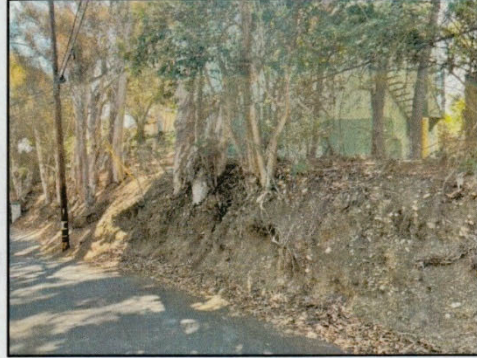


The existing Reservoir B14 is old and in need of numerous structural, safety and health retrofits.

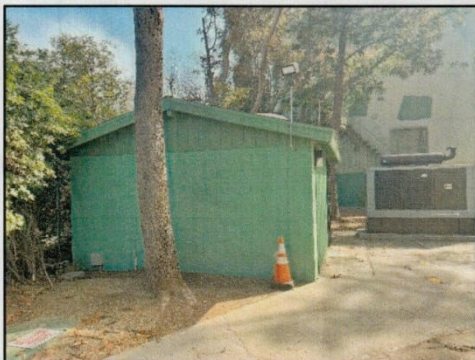
Plant B15 – Existing Site Conditions



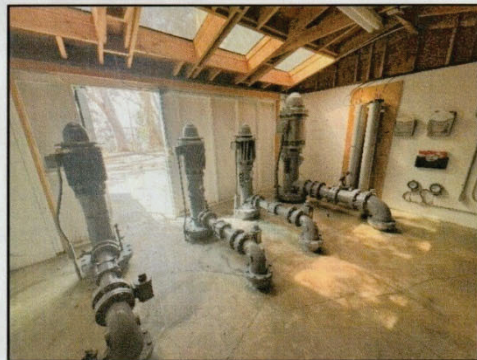
Existing entrance gate looking south.



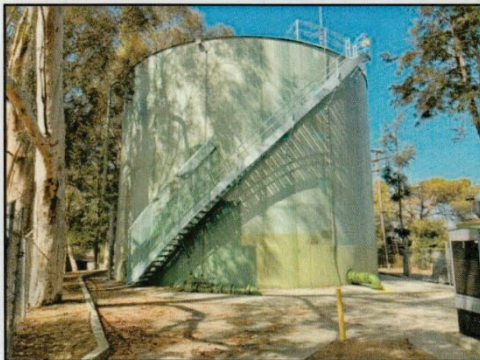
San Gabriel will stabilize the slope at the public right-of-way.



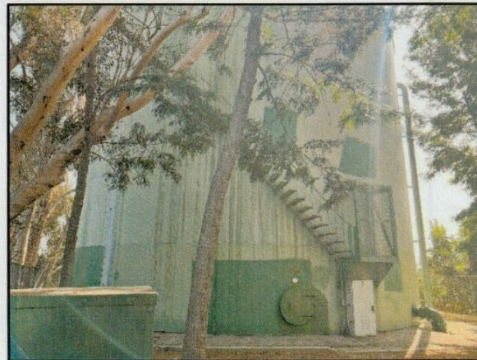
Existing pump station building



Existing pumps



Existing Reservoir B15 West (B15W)

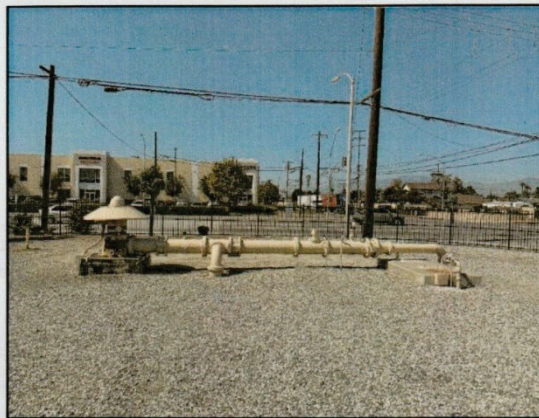


Existing Reservoir B15 East (B15E)

Plant B7 – Existing Site Conditions



Existing Gate at entrance of Plant B7 keeps unauthorized personnel from entering the facility.



Existing well B7E located on the Northwest corner of Plant B7.

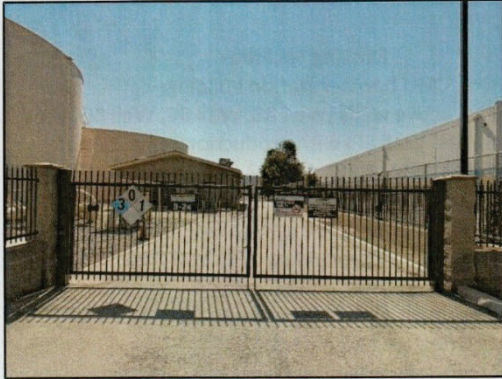


Existing Air Stripping Tower for Water Treatment and removal of VOCs.

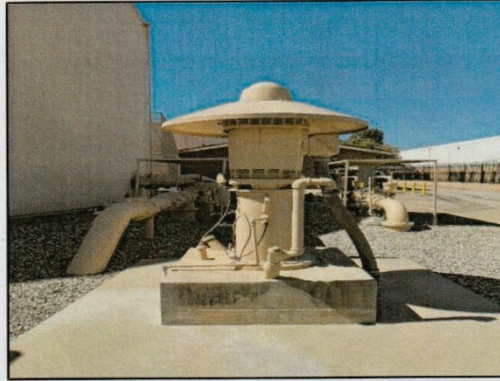


Existing Concrete Block building with Chlorination Equipment.

Plant B24 – Existing Site Conditions



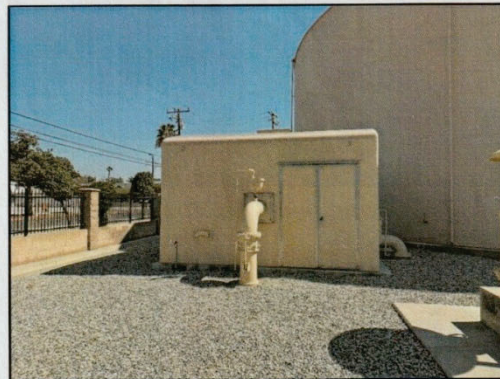
Existing Gate at the entrance of Plant B24 keeps unauthorized personnel from entering the facility.



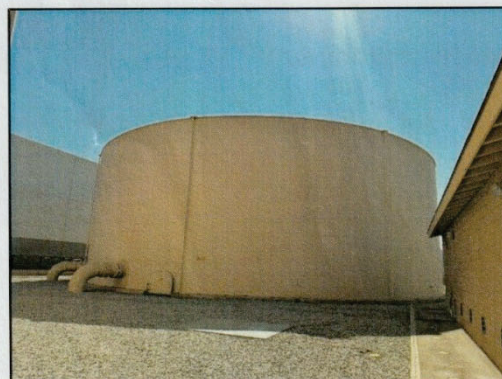
Existing wells at Plant B24 require wellhead treatment to remove VOCs.



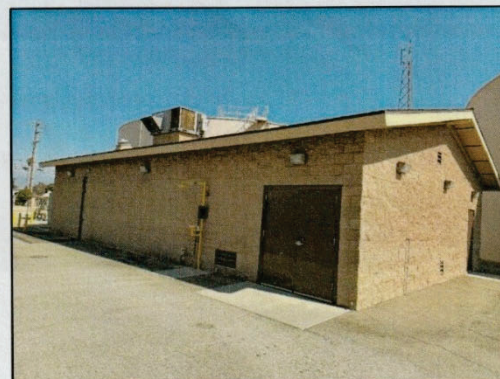
Well B24C was completed. Not in service due to potential of contaminated water. DDW will not issue a permit until wellhead treatment is available.



Existing Hydro Station between Well B24B and Reservoir B24 (East).



Existing Reservoir B24 West (B24W)



Existing Booster Station Building with AC System.

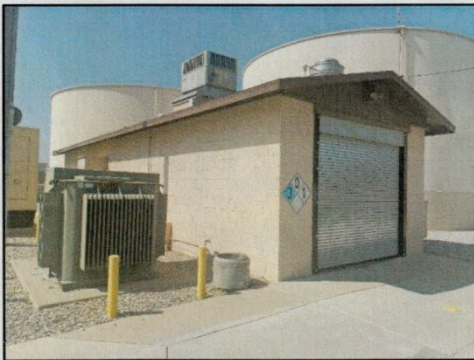
Plant No. 8 – Existing Site Conditions



Existing Office and UV Treatment Building



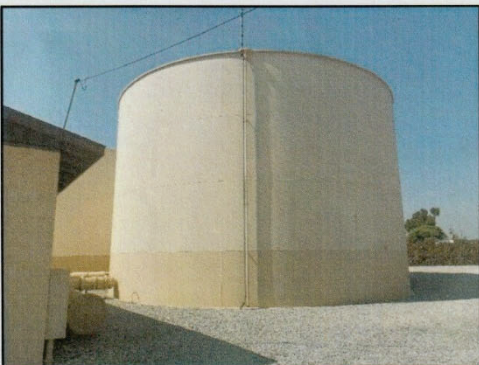
Existing UV Treatment



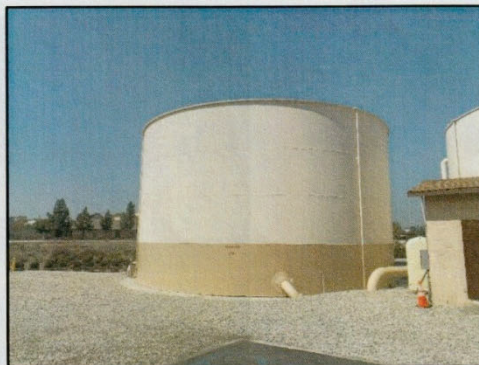
Existing Booster Station Building



Existing Booster Pumps



Existing Plant No.8 Reservoir East (8E)

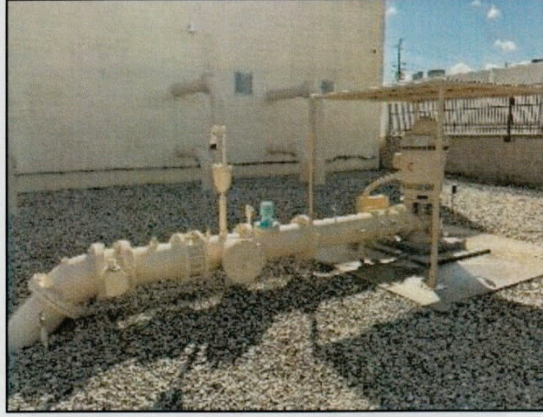


Existing Plant No.8 Reservoir West (8W)

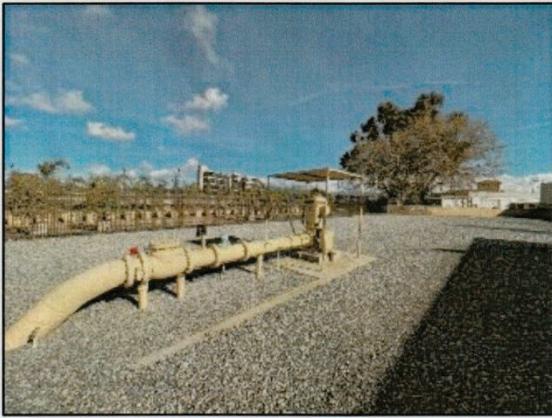
Plant No. 8 – Existing Site Conditions Continued



Well 8B



Well 8C



Well 8D

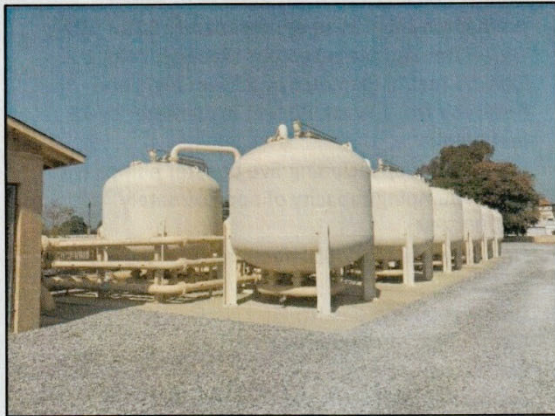


Well 8E

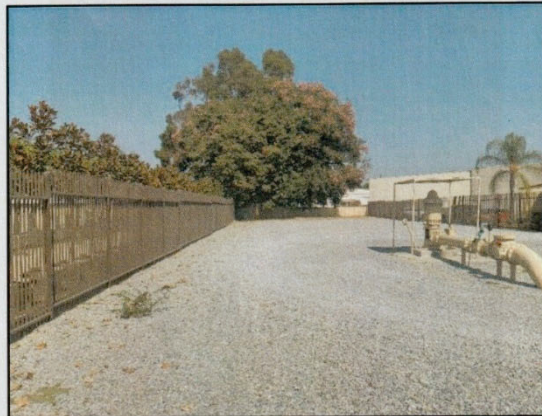


Well 8F

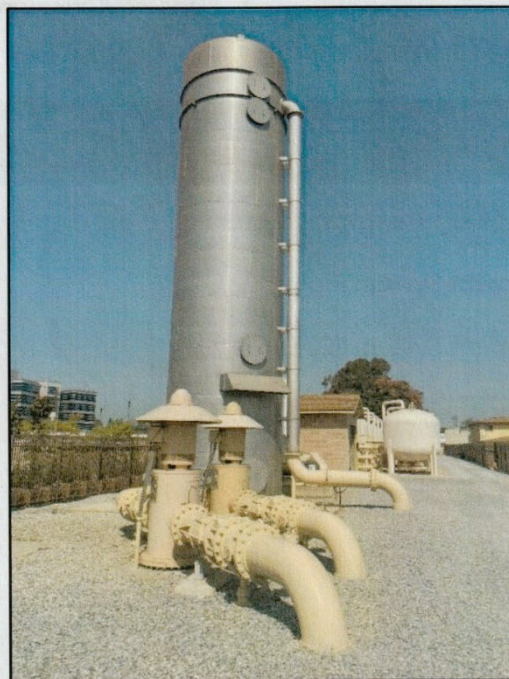
Plant No. 8 – Existing Site Conditions Continued



Existing GAC Treatment System

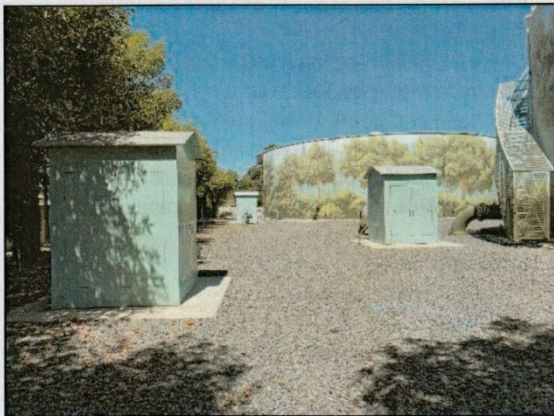


This crushed rock area will be the location of the proposed PFAS treatment system.

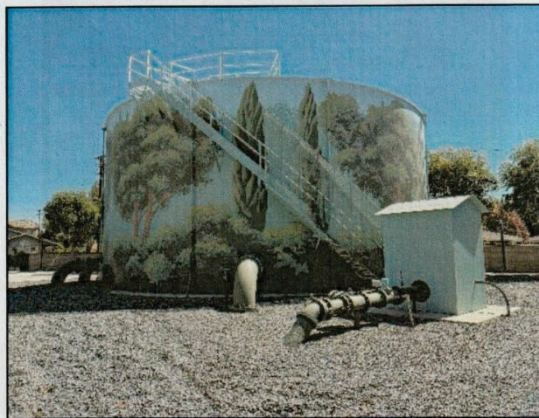


Existing Air Stripper and Booster Pumps

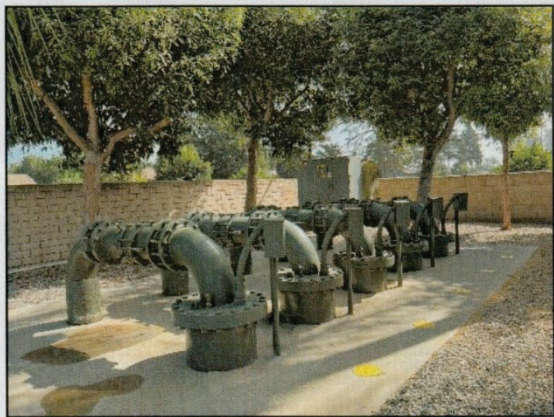
Plant No. 1 – Existing Site Conditions



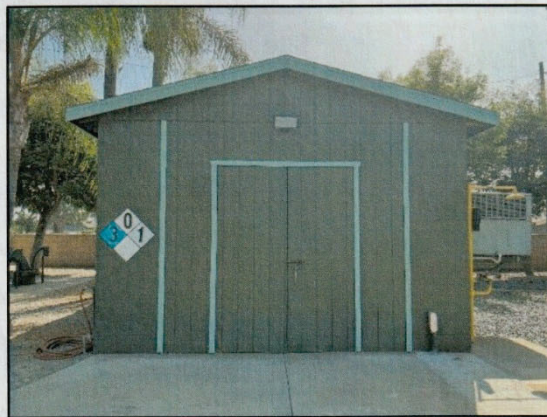
Existing Well 1B, 1D, and 1E buildings and Plant No. 1 Reservoir West (1W)



Existing Plant No. 1 Reservoir East (1E) and Well 1B building

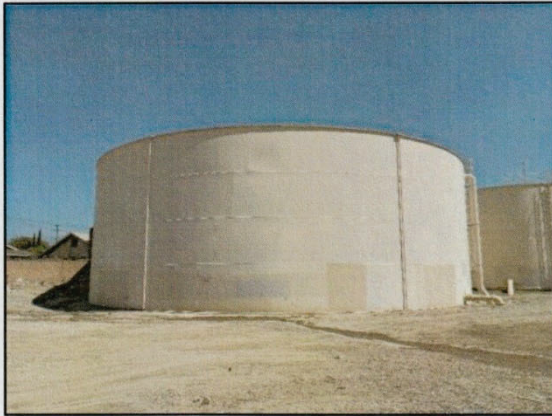


Existing booster station

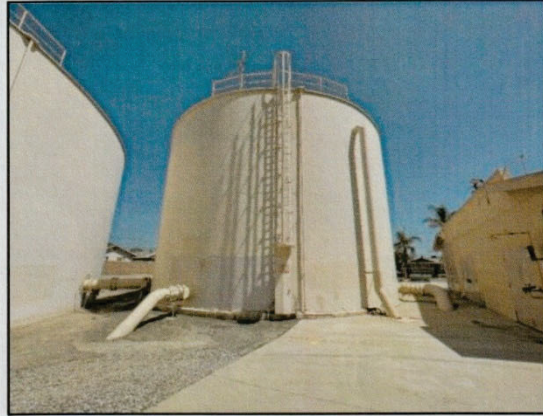


Existing electrical and chlorine room building

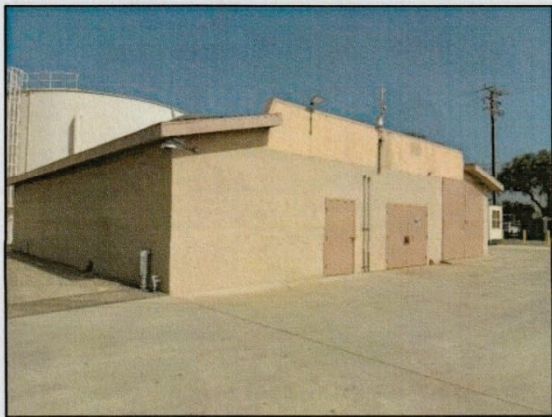
Plant No. 11 – Existing Site Conditions



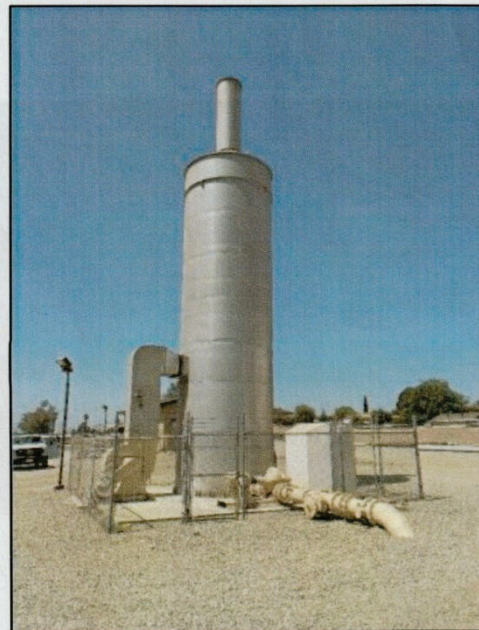
Existing Plant No. 11 Reservoir West (11W)



Existing Plant No. 11 Reservoir East (11E)



Existing booster station and treatment system building



Existing air stripper

Plant No. 11 – Existing Site Conditions Continued



Well 11A



Well 11B

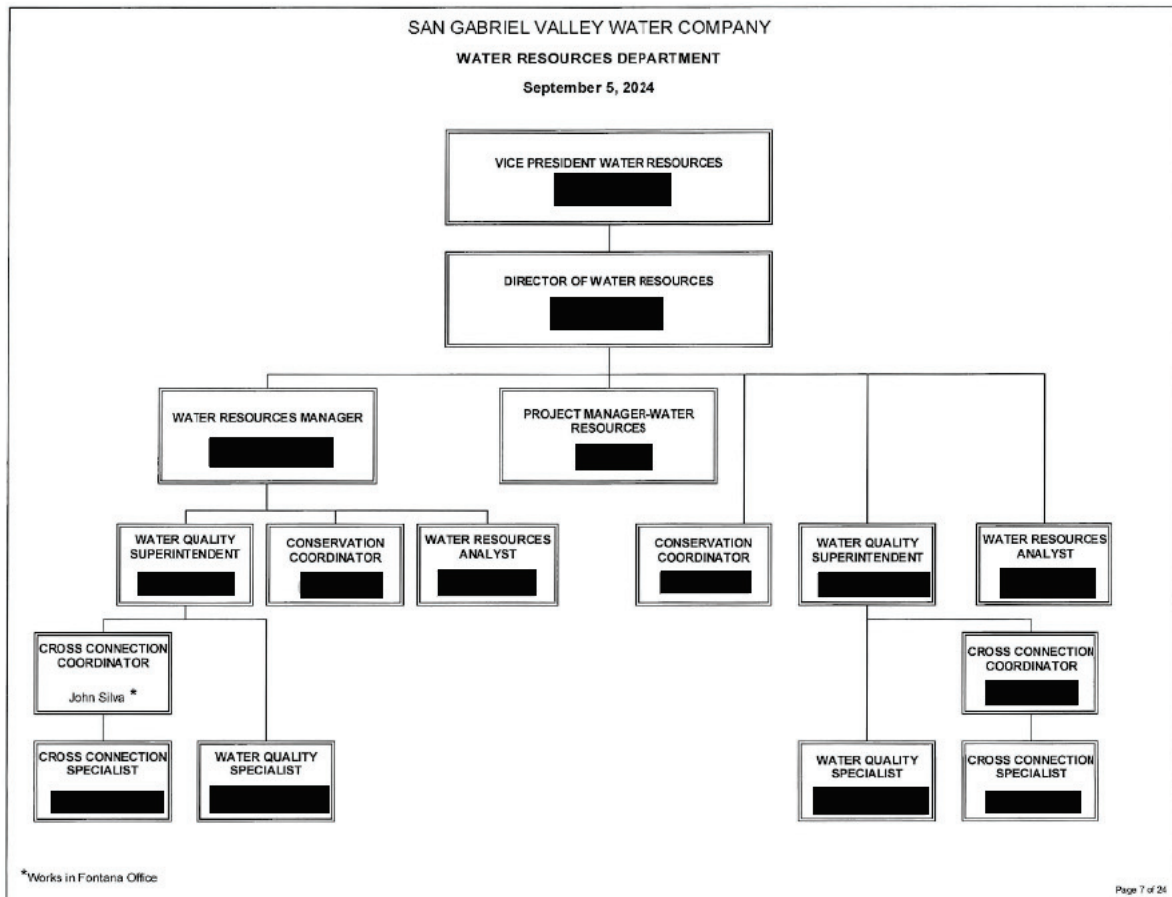


Well 11C

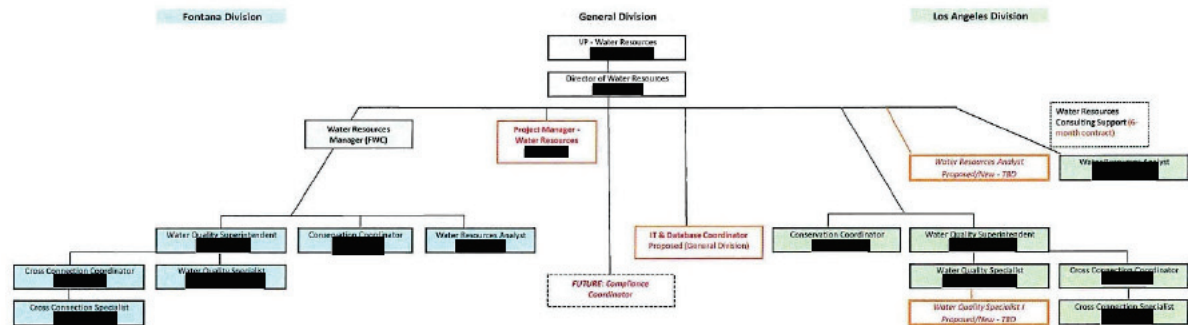


Well 11D

CONFIDENTIAL Attachment 2-3: Attachment D – 2024.2025 GRC Positions Evaluation



PROPOSED CHANGES 2024/2025:



Request IT & Database Manager - Merge WQ and Production Divisions for each division. Create and manage new monthly production/operations report. Add in new business system data management for data requests.
Request Water Quality Specialist Positions 6 in LA Division. Need assistance in the LA Division due to the additional treatment plant samples, additional LGRI inventory and sampling in schools. Transition sampling duties from the Operations to Water Resources Department.
Approach David Vahry position as Project Manager - Water Resources
Request Water Resources Analyst Position for LA Division. Assist with the growing grant management requirements & submittals. Support to aid in the new Conservation Reporting for both Divisions.
Consultant Support for Water Resources staff in new reporting requirements and sufficient representation.

Future Need: Compliance Coordinator to track all Water Resources, Water Quality and Conservation requirements, reporting and future tasks.

Red Text - Shows Proposed/potential changes
Orange Box - Proposed new positions

Water Resources - New Position Salary Study

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1. Water Resources Manager/Analyst (Fontana)

	Annual Salary	
Analyst)	\$ 114,566	Approved Position - Existing Salary
Manager)	\$ 246,373	Replaced
Manager)	\$ 170,414	(Existing Position-New salary upon transfer)
	\$ 75,858	Salary Savings

2. Water Resources Manager/Analyst (LAC)

	Annual Salary	
Analyst)	\$ 114,566	Approved Position - Existing Salary
Manager)	\$ 217,090	Retired
New/Proposed Water Resources Analyst (LAC)	\$ 90,693	(Proposed new salary upon transfer)
	\$ 126,397	Salary Savings

3. Project Manager - Water Resources (General)

	\$ 207,024	As Treatment Superintendent
	\$ 217,381	(new salary upon transfer)
	\$ (10,357)	Salary Increase

4. Database Coordinator - Water Resources (General)

	\$ 129,230	Approved Position - Existing Salary
Current Conservation Coordinator)	\$ 135,692	(Proposed new salary upon transfer)
New/Proposed (Promote Patrick Soto)	\$ (135,692)	Salary Increase

5. Water Quality Specialist - (LAC)

	\$ 102,627	Approved Position - Existing Salary
	\$ 98,634	Approved Position - Existing Salary
New/Proposed (TBD)	\$ 71,677	Proposed Starting Rate Scale (Existing)
	\$ (71,677)	Salary Increase

Proposed Total Salary Adjustment to the Water Resources Dept.:	\$ (15,470)	Proposed Salary Increase
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October 5, 2021

WATER RESOURCES ANALYST

JOB DUTIES AND ESSENTIAL FUNCTIONS

Under the supervision of the Los Angeles County Water Resources Manager, assists both the Los Angeles County and Fontana Water Company Water Resources Managers in monitoring developments at Main San Gabriel Watermaster, Central Basin Watermaster, Water Replenishment District, Chino Basin Watermaster, Rialto Basin Groundwater Council and the San Bernardino Basin Groundwater Council.

JOB DUTIES AND ESSENTIAL FUNCTIONS

Responsible for a variety of tasks and duties which may include, but would not be limited to, the following:

- Assist with leases of supplemental water rights as directed.
- Monitor regulations and water assessment fees for both divisions.
- Monitor and verify monthly purchases of State Water Project supplies from Metropolitan Water District of Southern California, Inland Empire Utilities Agency and San Bernardino Valley Municipal Water District.
- Monitor and verify assessments from the Water Replenishment District.
- Review correspondence and notices from regulatory agencies regarding water resources for both divisions.
- Prepare reports, filings, spreadsheets, applications and other documentation as they relate to both division's water resources.
- Review and provide direction to legislation as it relates to water supply, water transfers and/or water storage.
- Other tasks and duties as directed.

SKILLS, KNOWLEDGE AND PHYSICAL REQUIREMENTS

Skills, knowledge and physical requirements include, but are not limited to:

- Good understanding of federal and state drinking water regulations, Main Basin Judgement, Central Basin Judgement, Chino Basin Judgement, Western Judgement, Rialto Decree and the 1924 Lytle Creek Judgement.
- Ability to prepare written technical reports, ability to give oral presentations regarding water resources, water transfers, and/or water storage.
- Capable of working closely with industry professionals and public officials.
- Knowledge of data analysis methods.
- Neat and professional appearance.
- Ability to write legible, type proficiently, and have good reading comprehension.
- Good working knowledge of computer skills, including Photoshop, Microsoft Word, Microsoft Excel, Microsoft PowerPoint, and advanced search engine techniques.
- Must be dependable, punctual, and have good attendance.
- Ability to work independently with limited supervision, and follow oral and written instructions.
- Ability to interact with supervisors and co-workers in a cooperative and professional manner.
- Familiarity with safety practices and procedures.
- Ability to perform repetitive physical activities, including sit, stand, walk, bend, stoop, reach, grasp, push, pull, dig, climb, crouch, squat, crawl, twist, and lift up to 50 lbs.

EDUCATION, TRAINING AND EXPERIENCE

The following are required:

- High school diploma.
- College courses or degree desirable.
- Valid California driver's license and acceptable driving record.
- California Department of Drinking Water Grade 1 Water Distribution Operator and Grade 1 Water Treatment Operator certificates.

WATER RESOURCES ANALYST

Not included in Job Description – Additional Support Needed for the Following (2024/2025):

Additions on **JOB DUTIES AND ESSENTIAL FUNCTIONS:**

NEW: Job Duties and Essential Functions that need attention: Manage all Prop.68 and Federal Funding grant administration requirements through SWRCB, Water Quality Authority and the Water Replenishment District. Assist the Conservation Department as necessary to meet all new reporting requirements as of 2024.

- Seek out, apply and secure all potential grant funding opportunities to offset Company capital and ongoing O&M costs.
- Prepare and submit all grant invoices and required forms. Includes review and collection of all charges with coordination from the Accounting, Engineering and Operations Departments.
- NEW: Revise and update annual grant budgets, budget detail sheets and project close out costs with respective funding agencies: SWRCB Prop 68, WQA Federal Funding Program Administration and WRD.
- NEW: Assist the Conservation Department to complete new monthly and annual reporting requirements: SAFER Clearinghouse Reporting, SAFER Urban Drought & Conservation Monthly Report, Water Use Objective Reporting and Water Loss Reporting/monthly data collection.

Additional requirements for **EDUCATION, TRAINING AND EXPERIENCE:**

NEW: Proficiency in grant writing, knowledge of California state and federal funding regulations, and experience in managing grant applications and compliance processes

WATER QUALITY SPECIALIST

JOB SUMMARY

Under the supervision of the Water Resources Manager and the Water Quality Superintendent, oversees the water quality monitoring in either the Los Angeles County and/or Fontana Water Company division to ensure compliance with all state and federal drinking water standards.

JOB DUTIES AND ESSENTIAL FUNCTIONS

Responsible for a variety of tasks and duties which may include, but would not be limited to the following:

- Schedule and perform water quality sampling.
- Report monitoring results to appropriate regulatory agencies.
- Prepare and submit written technical reports on water quality, operation of treatment facilities, and other related issues to the California Department of Public Health and other agencies.
- Attend workshops, meetings, and seminars on water quality issues and related matters.
- Assist in the preparation of the Annual Water Quality Report.
- Assist in the preparation and updating of the company's Public Health Goal Reports, Urban Water Management Plans, Drought Contingency Plans, and similar reports and plans.
- Monitor the company's National Pollutant Discharge Elimination System compliance program.
- Give oral presentations regarding water quality.
- Other tasks and duties as directed.

SKILLS, KNOWLEDGE, AND PHYSICAL REQUIREMENTS

Skills, knowledge and physical requirements include, but are not limited to:

- Thorough knowledge of federal and state drinking water regulations and familiarity with SDWA, CWA, CEQA, NPDES, AQMD, and other environmental standards.
- Ability to work effectively with Production Department personnel, regulatory agencies, and the public in a cooperative and professional manner.
- Good personal computer skills using Microsoft Word, Excel, and PowerPoint, and general knowledge of and capability with the Internet.
- Ability to communicate effectively orally and in writing, and to write legibly.
- Have good reading skills and ability to quickly comprehend.
- Must be dependable, punctual, and have good attendance.
- Neat and presentable appearance.
- Ability to perform repetitive physical activities using feet, legs, hands, and arms, and be able to use keyboard, walk, sit, stand, climb stairs and heights up to 40 feet, reach, grasp, lift up to 20 lbs., push, pull, crouch, squat, and crawl.

EDUCATION, TRAINING AND EXPERIENCE

The following are required:

- High School diploma.
- Valid California driver's license and acceptable driving record.
- Grade T2 Water Treatment Operator and Grade D1 Water Distribution Operator certificates.
- College degree or equivalent work experience in the field of water quality desirable.

WATER QUALITY SPECIALIST

Not included in Job Description – Additional Support Needed for the Following (2024/2025):

Additions on **JOB DUTIES AND ESSENTIAL FUNCTIONS:**

NEW: Meet all applicable LCRR and LCRI existing and future requirements including but not limited to maintaining service line inventory and sampling in schools. Ensure compliance with any new compliance resulting from the Operable Units, permit amendments and requirements from the newly acquired Montebello 2 water system.

- Maintain lead service line inventory in compliance with existing and future LCRR and LCRI requirements. This includes but is not limited to inspection of a portion of the Company's service lines each year.
- Develop and maintain a monitoring program for lead testing in schools. Work includes communication, evaluation, scheduling and sampling a portion of the schools in the Company's service area on an annual basis.

Additional requirements for **SKILLS, KNOWLEDGE, AND PHYSICAL REQUIREMENTS:**

NEW: Ability to work outside of normal Company business hours to meet emergency and non-emergency compliance requirements.

2024/25 GRC – Water Resources Positions:

Project Manager – Water Resources (General Division)

- Awarded to David Van, Announced on June 19, 2024
- A primary representative and liaison was needed to manage the various operable units in LAC Division and the Mid-Valley Sanitary Landfill groundwater cleanup in the FWC Division. (Operable Units: BPOU, PVOU, SMOU and WNOU)
- Operable Units management responsibilities fell on multiple Operations staff previously. It was not an efficient use of time across multiple positions which had multiple other responsibilities to attend to.
- The position was needed to manage O&M Budgets and invoicing carefully to ensure full Company reimbursement of all qualifying expenses.
- David Van already had comprehensive knowledge of our various agreements and settlement decisions including renegotiation of expiring agreements, making him the ideal candidate.
- New challenges with PFAS resulted in increased workload approving, permitting, constructing and monitoring new treatment systems or blend plans. David's experience as the former Water Quality Superintendent and Treatment Superintendent greatly aid in negotiations with the Responsible Parties of the Operable Units in addressing PFAS.
- Additional grant funding received, increased workload for submittal packages and coordination with funding agencies (WQA, DTSE, EPA, SWRCB, etc...). Supervision role needed for Analyst.
- WNOU construction and future operations, new agreements needed. BPOU Renegotiation kicks off in 2025, anticipated to be a 2-year process.
- Announcement, approved recommendation memo, and Job Description available for support.

Water Quality Specialist (LAC Division)

1. Permit Amendment and Acquired Systems – Increased compliance requirements: SGVWC's Los Angeles County Division has had (1) Water Quality Specialist going back to our first Permit Amendment received in 1999. Since then, San Gabriel has had 20 permit/amendments for its El Monte/Whittier System (1910039) and incorporated two additional Water Systems, Montebello 1 and Montebello 2 (1910189 and 1910117 respectively), with another 8 permits/amendments combined. Each permit/amendment and new water system has its own unique sampling and compliance requirements, yet SGVWC has not added an additional Water Quality Specialist to adequately match the resulting increase workload. SGVWC needs an additional Specialist to ensure we meet existing and future permit requirements. See the list below:

San Gabriel El Monte/Whittier System 1910039

Permit	Permit Amendment	Submitted Date	Effective Date	Plant	Description
1910039\04-15-99-P-008.pdf	04-15-99-P-008		03/25/99	1a-Division	Water Supply Permit
1910039\1910039PA-001.pdf	1910039PA-001	12/21/99	07/18/02	Plant No. 8	Packed Tower Aeration Air Stripper Water Treatment Facility
1910039\1910039PA-002.pdf	1910039PA-002	06/17/03	06/08/05	Plant B6	Air Strippers, Ion Exchange, and UV Light Water Treatment Facility
1910039\1910039PA-003.pdf	1910039PA-003	05/24/04	09/19/05	Plant G4	Liquid Phase Granular Activated Carbon Water Treatment Facility
1910039\1910039PA-004.pdf	1910039PA-004	06/17/03	02/17/06	Plant B6	Off-site Extraction Wells B25A, B25B, B26A, B26B
1910039\1910039PA-005.pdf	1910039PA-005	03/09/04	06/12/06	Plant No. 2	Well 2F
1910039\1910039PA-006.pdf	1910039PA-006	05/25/04	09/29/06	Plant No.8	Liquid Phase Granular Activated Carbon Second Barrier Treatment Facility
1910039\1910039PA-007.pdf	1910039PA-007	07/29/05	03/30/07	Plant B24	Wells B24A and B24B, Booster Station and Steel Storage Tanks
1910039\1910039PA-008.pdf	1910039PA-008	05/02/07	04/21/08	Plant B5	Liquid Phase Granular Activated Carbon , Ion Exchange, and UV Light Water Treatment Facility
1910039\1910039PA-009.pdf	1910039PA-009	07/29/08	06/30/09	Plant B5	City of Industry Well No. 5, additional extraction well for treatment plant
1910039\1910039PA-010.pdf	1910039PA-010	05/05/10	11/12/10	Plant B6	Steel Water Storage Tank B6-B
1910039\1910039PA-011.pdf	1910039PA-011	05/05/10	07/06/11	Plant G3	Steel Water Storage Tank G3-B
1910039\1910039PA-012.pdf	1910039PA-012	10/18/13	05/29/14	Plant G6	Steel Water Storage Tank G6-B
1910039\1910039PA-013.pdf	1910039PA-013	06/13/13	08/25/14	Plant B6	Single Pass Ion Exchange System
1910039\1910039PA-014.pdf	1910039PA-014	09/01/17	11/17/17	Plant G6	New Steel Water Storage Tank G6-A
1910039\1910039PA-015.pdf	1910039PA-015	10/02/17	05/08/18	Plant B6	Ion Exchange Nitrate Removal System
1910039\1910039PA-016.pdf	1910039PA-016	07/18/17	08/03/18	Plant No. 11	Well 11D
1910039\1910039PA-017.pdf	1910039PA-017	10/31/19	12/31/19	Plant No. 1	Steel Water Storage - Tank-1 West
1910039\1910039PA-018.pdf	1910039PA-018	01/18/18(UVAOP)			
1910039\1910039PA-019.pdf	03/24/201X PFAS)	07/02/21		Plant W6	Ion Exchange for PFAS Treatment and Trojan UV/PHOX AOP Treatment for 1,4-Dioxane
1910039\1910039PA-020.pdf	1910039PA-020	08/23/21	10/14/21	Plant No. 1	Steel Water Storage - Tank-1 East (Replacement Tank)
		08/23/21	12/22/22	Plant No. 2	Ion Exchange for PFAS Treatment

San Gabriel Montebello 1 System 1910189

Permit	Permit Amendment	Submitted Date	Effective Date	Description
1910189\1910189 - Full Permit	04-07-05P-006		08/05/05	Water Supply Permit
1910189\1910189PA-001.pdf	1910189PA-001	10/23/06	01/18/07	Utilize groundwater from Main SG Basin as a water source to Montebello's customers
1910189\1910189PA-002.pdf	1910189PA-002	08/23/21	06/12/23	Steel Water Storage - Tank M3 East (Replacement Tank); and addition of M3 West (New Tank)
1910189\1910189PA-003.pdf	1910189PA-002	08/23/21	10/12/23	Steel Water Storage - Tank M3 East (Replacement Tank); and addition of M3 West (New Tank)

San Gabriel Montebello 2 System No. 1910117

Permit	Permit Amendment	Submitted Date	Effective Date	Description
1910117\1910117-Permit 73-016.pdf	Permit No. 73-016	9/11/1972	05/25/73	Water Supply Permit
1910117\1910117PA-001.pdf	1910117PA-001	4/15/2010	07/12/10	Replace tablet chlorination facility at Well 1 with a sodium hypochlorite facility
1910117\1910117PA-002.pdf	1910117PA-002	10/22/13	04/28/16	Add a new connection with San Gabriel Valley Water Company
1910117\1910117 - Permit No. 04-22-23P-002	Permit No. 04-22-23P-002	12/19/2022	03/21/23	Water Supply Permit - Change of Ownership

2. Additional assistance is needed to complete Operable Unit or Contract Agreement permit required samples: Increasing complexity and volume of samples required and dedicated attention is needed for the following facilities

- Baldwin Park Operable Unit Plant B5 and B6
- Puente Valley Operable Unit Plant B11
- South El Monte Operable Unit Plant No. 8, Plant G4
- Whittier Narrows Operable Unit WNOU Plant
- Amarillo Mutual Water Company

3. Assistance with Title 22 Monitoring: Although Main San Gabriel Watermaster producers pay an assessment to have Title 22 samples collected by Stetson Engineers, increased support and time is needed from our dedicated staff to confirm compliance with regulatory requirements. This includes review of sample results, data and monitoring reports. Stetson assists with the T22 sampling, however triennial general mineral and general physicals are not part of the assessments and SGVWC is required to sample for them.

4. Bacteriological Site Sampling Plan (BSSP) Samples: SGVWC's single Water Quality Specialist does not have sufficient time to collect the additional sampling requirements of our BSSP. Currently the Production and Treatment Departments Water Treatment/Production Operators take away time from

their required list of duties to assist with collection of all 48 sample sites (53 now including Montebello 2) throughout the system. SGVWC Water Resources department needs an additional Water Quality Specialist to ensure thorough and timely sampling is completed. This proactive measure prevents any miscommunication with staff outside of our department as they have their own unique day-to-day duties to ensure treatment and production systems are working properly. The Water Quality Department needs to take responsibility for collecting all its samples to avoid future Monitoring Violations and allow for job responsibilities to fall back on their respective departments.

5. Disinfection By-Products: A new Water Quality Specialist will provide relief to ensure SGVWC is addressing the required Disinfection By-Products monitoring requirements and analysis.

6. Lead and Copper Monitoring: An additional Water Quality Specialist is needed to ensure timely communication, collection and repetitive visits to our customers during the process to meet current requirements. Future requirements include lead testing in schools that is further described in testimony.

7. Lead Service Line Inventory: Company staff were fully burdened with their existing workload to complete the inventory requirements and therefore provisional/temporary employees were hired to complete the inventory work to meet 2024 requirements. Future ongoing compliance will be completed with the proposed Water Quality Specialist.

8. Current and Future PFAS Treatment Facilities: Specialized expertise is required for monitoring PFAS at these facilities. Aid from our Production and Treatment Department is not an option without advanced training of all their employees. This growing responsibility falls on our current Water Quality Specialist. Currently there are two 5,000 gpm PFAS treatment facilities (Plant W6 and No. 2) that require monthly and weekly samples. The required time to prepare sampling kits, collect samples, deliver to laboratory, file the chain of custody, and drive time is 3-4 hours each plant. Samples are then analyzed by lab and samples analysis are sent to Water Quality staff between 4 – 6 weeks. Review and data upload is 1 hour. In addition to the two facilities in operation, Plant No. 1, No. 11, No. 8, B5 and Whittier Narrow Operable Unit will have this same monitoring requirement. An additional trained Water Quality Specialist is needed to complete the growing number of samples required for PFAS at these treatment facilities.

9. Centralized Sample Collection: The additional Water Quality Specialist is needed to streamline current and future processes by having all samples collected by one department for efficiency, accuracy, control and overall responsibility. Additionally, having all sample collections centralized in one department is important to prevent any miscommunication that could lead to potential violations from DDW. Keeping sampling responsibility within Water Quality helps with consistency, accountability, and compliance with regulatory requirements. Currently other departments with their own duties and responsibilities are heavily relied on to complete all the required sampling.

IT & Database Coordinator (General Division)

This role is very much needed for maintaining, managing and creating data/databases related to various Water Resources sub-departments, including Water Quality, Production, Conservation, and future CII water budgets. The Database Coordinator will be key in ensuring accurate and timely reporting to multiple agencies and regulatory compliance reporting.

Currently our Conservation Specialist constructed and manages the FWC Divisions Water Production Reporting Database, the Water Quality Reporting Database and the Water Quality Monitoring Database due to his skillset in computer programing and knowledge of Access. With new conservation regulations coming, more time will be needed to focus on meeting the Company's conservation targets and will take away time from these critical databases that are used by multiple departments for critical reporting, billing and compliance. In addition, we would like to incorporate the same databases in our Los Angeles County Division, which has not been achievable due to his schedule and current duties being fully exhausted and the workload stretched as is.

The list below includes some of the duties needed by the IT & Database Coordinator:

1. Water Quality Data Management: Ensure accurate recording, tracking, and reporting for DDW reports (CCR, eAR, Monthly Reports, Testimony, in-house reports). Key for creating a LAC Division WQ Database that is comparable to FWC's. In-house database and management to avoid costly 3rd party services and protects and secures our data locally.
2. Production Data Coordination: Manage production data for monthly and annual reports, and create trends to compare with water quality to support operational efficiency and regulatory compliance.
3. Conservation Program Tracking: Maintain records for conservation efforts and track progress toward conservation goals related to new regulation for CA Making Water Way of Life. SAFER and WUO Reporting. Water Loss Reporting.
4. CII Water Budgets: Oversee the development and maintenance of water budgets for Commercial, Industrial, and Institutional customers.

Critical Reporting Responsibilities include exporting/collecting data for the Water Resources Department (Analyst and Managers) to complete the following reports:

- Watermaster Reports: Assist with data requests for reports as required by the Watermaster.
- Division of Drinking Water: Assist Water Quality with data request, reports and monitoring databases to ensure compliance with reporting requirements to the Division of Drinking Water.
- Water Quality Authority: Assist with data and reporting for the Water Quality Authority.
- Chino Basin Watermaster: Assist with data requests to ensure timely and accurate submission of reports to the Chino Basin Watermaster (Quarterly, monthly, annual).
- Rialto Basin Groundwater Council: Assist with data requests (water levels and production).

- Urban Water Management Plan: Encompass data from WQ, sales, production demands, and forecast.
- General NPDES: Ensure compliance with National Pollutant Discharge Elimination System reporting.
- Water Loss Reports: Track and report on water loss.
- Annual eAR Reports: Compile data for the annual eAR.
- CPUC Reports: vary in type of data request.
- Operable Unit Reports: Assist with data requests for Operable Units reports (operational reports).
- Financial Water Forecast: Assist with data requests for financial forecasts related to water usage and costs.
- Weather Trends Analysis: Monitor and report on weather trends impacting water resources and supply.

The Database Coordinator will play a crucial role in streamlining our data management processes, preventing any miscommunication or errors, and ensuring that all regulatory requirements are met efficiently and accurately. This position is important for maintaining our compliance with various regulatory agencies and supporting our operational goals.

Water Resources Analyst (LAC Division)

1. Needed assistance to Meet Existing Grant Requirements: SGVWC's Los Angeles County Division has been successful in receiving multiple grants. These grants require closely working with the Company's Operations, Accounting and Engineering Departments to secure funding for upcoming projects, prepare quarterly invoices for operations, maintenance, and capital project reimbursements (including labor and materials), revise and update proposed budgets as needed, ensure all documentation complies with grant guidelines, track reimbursed and collected amounts for the State Water Resource Control Board's Proposition 68 grant, WQA's Federal Funding Program Administration and the Water Replenishment District PFAS Remediation Project grants.

See summary of grants below:

Source of Grant	Basis of Grant	Amount of Grant	Date of Award	Purpose of Grant	Terms of Grant	Type of Expense Covered
State Water Board	Proposition 84	\$ 1,302,612	September-2012	Plant B6 to B24 Pipeline	Aug 2012 - Aug 2015	Capital
CA Energy Commission	Electric Program Investment Charge Program	\$ 500,000	February-2017	Plant B24 Hydro	Mar 2017 - Dec 2019	Capital
State Water Board	Proposition 1	\$ 1,424,959	January-2019	Plant B6 UV Flex	Jan 2018 - May 2022	Capital
State Water Board/DTSC	Proposition 1	\$ 7,103,433	February-2019	Whittier Narrow Operable Unit	Feb 2018-April 2024	Capital
State Water Board	Proposition 68	\$ 4,414,000	June-2021	Plant W6 & B24	Oct 2020 - Feb 2023	O & M
State Water Board/WQA	Proposition 68	\$ 2,437,000	December-2021	Plants No. 8, No. 11 & G4	July 2018 - Feb 2023	O & M

*Table does not include recent grant for No. 11.

The responsibility of increased workload from grants has been shared across multiple staff members from Water Resources and Operations. However, majority of the workload has been on the

current Water Resources Analyst who has had to set aside other key duties. The new analyst position is needed to ensure we maintain these valuable grants and meet all requirements.

2. Assistance to comply with Conservation Reporting Requirements: The new requirements as part of "Making Conservation a California Way of Life" and the resulting monthly and annual reporting requirements are very time consuming and overburdensome. The monthly drought reporting has gone from a 2-3 page report to over 40 pages with the new reporting requirements, much of which is supplied and reviewed by our Water Resources team. The proposed Analyst position is needed to aid our Conservation Department to ensure we comply with the proposed timelines and monthly reporting requirements. Conservation still meets their existing job duties and responsibilities of running their programs.

3. There is a need for focused attention on Central and Main Basin representation, leases, various submittals, assessments, unique water costs, etc... due to the loss of a LAC Division Water Resource Manager. Consulting services will be used through May for LAC Division Water Resources related duties not being covered by the former Manager. An additional analyst is a lower cost option than proposing an additional manager and allows for San Gabriel to evaluate options for future succession planning.

4. Future succession planning: Promotion of current Water Resources Analyst to Coordinator. Will train under past Water Resources Manager and Director. Option to promote into the new LAC divisional Water Resources Manager if needed in future.

FUTURE: Water Resources Compliance Coordinator

As a result of the increasing reporting requirements in Water Resources, Water Quality and Conservation, there is a need to track deadlines and monitor new upcoming compliance targets being proposed that could have an impact on the company if missed. New regulations are perpetual and a key person to ensure we stay in compliance would be a proactive step versus missing a key deadline with negative impacts on the Company. Not only is the Water Resources Department directly responsible for ensuring the public's health and well-being, but we also manage an extensive water supply portfolio with varying costs and valuable water rights that impact customers' rates. Protecting the public and its rates are all part of the varying reporting requirements placed on our Company.

This is a position that will be proposed in the future.

Estimated Annual Man-Hours for Regulatory Reporting

⚙ Key Assumptions:

- Utility serves **300,000 customers** over **60 sq miles** with wells, pumps, surface water, and inter-connections.
 - Data sources include SCADA, GIS, AMI/AMR, financial/billing systems, and manual field reports.
 - Staff includes engineers, analysts, compliance specialists, operations managers, and administrative support.
 - Some data overlaps across reports but still requires validation and QA/QC.
-

Estimated Annual Man-Hours by Report

Report / Requirements	Frequency	Estimated Man-Hours/Year	Notes
1. eAR via SAFER Clearinghouse	Annual	18	Data aggregation from operations, finance, and management.
2. SAFER Urban Drought & Conservation (Monthly)	Monthly	120–150	~10–12 hours/month to verify production and conservation data across zones.
3. WOU Annually (Urban Water Use Objective Report)	Annual	60–80	May increase with future enforcement. Requires outdoor/indoor usage analysis. CII budgets will increase time
4. Water Loss Audit (Validated)	Annual	50–60	Includes AWWA software data entry + third-party validator coordination.

Report / Requirements	Frequency	Estimated Man-Hours/Year	Notes
5. Water Leak Detection Tracking (upcoming for 2028)	Annual	50–70 (future workload)	Likely more once reporting is active (e.g., assembling 3 years of field activities).
6. CCR Water Quality Report	Annual	80–100	Sampling data, lab coordination, public notice preparation, legal review.
7. Monthly Production Report	Monthly	12–24	~1–2 hours/month from SCADA/billing + QA/QC of meters.
8. CPUC Form 458 Report	Monthly	12	Focuses on financial and operational data (investor-owned utilities only).
9. CPUC Annual Report	Annual	12–20	Includes financials, O&M, customer counts, revenue breakdowns.
10. SB 998 Water Shutoff Reporting (via eAR)	Annual	20–30	Relatively simple extraction from customer service/billing.

Additional Reporting Requirements

Other Reports / Requirements	Frequency	Estimated Man-Hours/Year	Notes
11. Urban Water Management Plan (every 5 years, ongoing updates)	5-year cycle	~200–300 (spread over years)	Staff may spend ~40–50 hrs/year on updates + supplements like drought assessments.

Other Reports / Requirements	Frequency	Estimated Man-Hours/Year	Notes
12. Annual Water Shortage Assessment (SB 606)	Annual	40–60	Modeling future supply/demand reliability.
13. Lead Service Line Inventory (due 2024)	One-time + updates	~150–250 initial + ~30/year	Larger utilities with complex systems may need extensive field/GIS reviews.
14. Risk and Resilience Assessment + Emergency Response Plans (AWIA)	5-year cycle	~150–200 (spread over years)	Depends on asset criticality and threat/vulnerability analysis.
15. Routine Water Quality Monitoring Reports (to SWRCB/SDWIS/EDT)	Continuous	~150–200	Regular lab uploads of regulatory sample data + internal QA/QC.
16. Lead Monitoring in Schools	Annual/Periodic	~200 hours - Varies depending on requests	A portion of schools each year. Includes 6 hours per school for coordination, sampling and reporting.
17. Prop 68 Grant Management	Monthly, Quarterly, Annual	~1045 hours	Preparing invoices, coordination between departments, budget updates and submittals
18. WRD Grants	Monthly, Quarterly, Annual	~1440 hours	Applications and submittals, coordination between departments and agencies, project close out tasks, and related duties
19. WQA Federal Funding Program Administration	Monthly, Quarterly, Annual	~460 hours	Grant search, applications, coordination between department and agencies, review and prepare updates.

Other Reports / Requirements	Frequency	Estimated Man-Hours/Year	Notes
20.Prop. 1 Grants	Monthly, Quarterly, Annual	~1045 hours	Preparing invoices, coordination between departments, budget updates and submittals

⚠ What Drives the High Workload?

- **System complexity:** A utility of this size has multiple production facilities, pressure zones, and data sources.
 - **Monthly + annual overlap:** Data (e.g., production numbers) feeds multiple reports but requires monthly QA/QC.
 - **Data integration gaps:** Manual reconciliation needed where SCADA, GIS, billing, and field data are not fully integrated.
 - **Review process:** Many reports require management, legal, or consultant review prior to submission.
-

⚠ **Note:** This estimate excludes time spent on regulatory audits, internal QA reviews, or responding to special regulatory inquiries (e.g., CPUC data calls, SWRCB investigations, or Public Records Act requests).

CONFIDENTIAL Attachment 2-4: Response to TGE-009

SAN GABRIEL VALLEY WATER COMPANY

March 28, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: **Response to Data Request No. TGE-009 (Water Resources Project Manager)**

Dear Mr. Aslam:

In response to your data request dated March 21, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

Please refer to SGVWC application Excel Workpaper “GRCWorkpapers – 2025 (FORMAL APPLICATION),” worksheet tab “PR4.” Line 202 shows a “Water Resources Project Manager” position filled by “Van, David V.” in the LAC division.

Please answer the following questions.

- a. Please provide the date SGVWC created the new “Water Resources Project Manager” position.
- b. Please provide the starting date for when “Van, David V.” assumed the position of the “Water Resources Project Manager.”
- c. Please provide in a tabulated Excel spreadsheet file all previous positions “Van, David V.” held at SGVWC, along with the hiring and end dates, the division assignment, and department assignment of each position. Please also provide the salaries, payroll taxes, 401k costs, insurance benefits, and worker’s compensation for each year worked by “Van, David V.” at each position. Please provide this data in the same tabulated Excel spreadsheet format as found in SGVWC application Excel Workpaper “GRCWorkpapers – 2025 (FORMAL

APPLICATION),” worksheet tab “PR4.” Please refer to the screenshots of Excel Workpaper “GRCWorkpapers – 2025 (FORMAL APPLICATION),” worksheet tab “PR4” as shown below.

The image contains two screenshots of an Excel spreadsheet. The top screenshot shows a worksheet with a table of employee data. The bottom screenshot shows a similar table with additional columns for payroll and insurance information.

Pos. No.	Notes	Emp. No.	Name	Hire Date	Division	Department	Employee Deferral %	Co Match	Company Annual Match %	Health Plan	Dental Plan	Dental Plan Dependents	Vision Plan	Workers Plan	2024 Salary
NEW POSITION 1159				12/26/24	LAC	WATER RESC	11.75%	11/2011	3.00%	6.00%	Kaiser HMO	1 DPO	1 BLUEVIEW	1 BHQ	\$217.38

Pos. No.	Notes	Emp. No.	Name	Salary	FICA	Medicare	FUTA	SUTA	Employee Deferral	Company Match	Health	Dental	Vision	Insurance Long Term Disability	Life	Workers Comp.
NEW POSITION 1159				\$223,681	\$10,844	\$3,243	\$42	\$119	\$23,500	\$20,131	\$1,010	\$625	\$92	\$90	\$1,485	\$1,496

RESPONSE NO. 1:

- The Water Resources Project Manager position was created on June 12, 2024.
- June 17, 2024.
- Please see /TGE-009 ATTACHMENT 1 – Employee History.xlsx/.

RESPONDING WITNESSES: Zvirbulis, Fealy

REQUEST NO. 2:

Please refer to SGVWC application file “EXHIBIT SG-8 (Zvirbulis).pdf” at pages 4 to 5, which discusses the specific duties and responsibilities of the new Water Resources Project Manager. Please answer the following questions.

- At page 5 of “EXHIBIT SG-8 (Zvirbulis).pdf,” SGVWC mentions the “recent retirement of the Company’s Water Resources Manager in the LAC division.” Does this new Water Resources Project Manager replace

the previously retired Water Resources Manager position in the LAC division? Please explain in detail why it does or does not replace the Water Resources Manager position.

- b. Please explain in detail the key differences in specific job duties and responsibilities between the new Water Resources Project Manager position and the Water Resources Manager position.

RESPONSE NO. 2:

- a. No. The job duties and essential function of the LAC Water Resources Manager, provided in Response /TGE-007 ATTACHMENT E – LAC Division Water Resources Manager.pdf/, do not overlap the duties and essential functions of the new Water Resources Project Manager.
- b. Refer to Response No. 2a and /TGE-009 ATTACHMENT 2 – Water Resources Project Manager.pdf/.

RESPONDING WITNESSES: Zvirbulis, Fealy

REQUEST NO. 3:

In SGVWC application file “EXHIBIT SG-8 (Zvirbulis).pdf,” at pages 4 to 5, in its discussion of the job duties and responsibilities of the new Water Resources Project Manager position, SGVWC writes:

This position serves as the primary representative and liaison for the management and oversight of the Baldwin Park, South El Monte, Puente Valley and the Whittier Narrows Operable Units (“Operable Units”) in the LAC division, and the Mid-Valley Sanitary Landfill Clean-Up in the FWC division. Additionally, this position provides high-level daily support in the administration of grants and related funding, Operable Unit operation and maintenance budgets, and invoicing for cost recovery.

This position also supports efforts related to ongoing mitigation of impacts associated with emerging chemical contamination, such as per- and polyfluoroalkyl substances (“PFAS”), including the design and construction of treatment facilities in conjunction with San Gabriel’s engineering department, consultants and coordination with numerous agencies including; the State Water Resources Control Board Division of Drinking Water (“DDW”), State Department of Toxic Substance Control (“DTSC”), Environmental Protection Agency (“EPA”), San Gabriel Valley Water Quality Authority (“WQA”) and the Main Basin Watermaster, in addition to others.

Please answer the following.

- a. Please explain in detail why SGVWC decided to create the new Water Resources Project Manager position.
- b. Prior to the creation of the new Water Resources Project Manager, what position or positions served as the “representative and liaison for the management and SGVWC oversight of the Baldwin Park, South El Monte, Puente Valley and the Whittier Narrows Operable Units (“Operable Units”) in the LAC division, and the Mid-Valley Sanitary Landfill Clean-Up in the FWC division,” as described in the quote above from SGVWC application file “EXHIBIT SG-8 (Zvirbulis).pdf,” at pages 4 to 5? Do these position(s) still exist at SGVWC?
- c. Prior to the creation of the new Water Resources Project Manager, what SGVWC position or positions provided “high-level daily support in the administration of grants and related funding, Operable Unit operation and maintenance budgets, and invoicing for cost recovery,” as described in the quote above from SGVWC application file “EXHIBIT SG-8 (Zvirbulis).pdf,” at pages 4 to 5? Do these position(s) still exist at SGVWC?
- d. Prior to the creation of the new Water Resources Project Manager, what SGVWC position or positions supported “efforts related to ongoing mitigation of impacts associated with emerging chemical contamination, such as per- and polyfluoroalkyl substances (“PFAS”), including the design and construction of treatment facilities in conjunction with San Gabriel’s engineering department, consultants and coordination with numerous agencies,” as described in the quote above from SGVWC application file “EXHIBIT SG-8 (Zvirbulis).pdf,” at pages 4 to 5? Do these position(s) still exist at SGVWC?
- e. Please explain in detail the benefits of the new Water Resources Project Manager positions performing these specific job duties and responsibilities as described above in Questions 3b, 3c, and 3d, in comparison to the previous position or positions that also performed these same job duties and responsibilities.
- f. Does the creation of the new Water Resources Project Manager position result in any cost savings for the ratepayers? If yes, indicate where in SGVWC’s workpapers did SGVWC incorporate these savings.
- g. Has SGVWC conducted a work study that examined the benefits of creating the new Water Resources Project Manager position? If the answer is “yes,” please provide all supporting documentation that supports this work study.

- h. Please provide one year's data from 2024 for all tasks, duties, and responsibilities performed by the new Water Resources Project Manager.
- i. What are the adverse impacts to SGVWC if the new Water Resources Project Manager position is not approved for this General Rate Case? Please explain in detail.
- j. How will any changes and improvements that result from the implementation of this new Water Resources Project Manager position be measured? Please explain in detail. Please also provide any documentation that supports these measured changes and improvements.

RESPONSE NO. 3:

- a. In addition to information provided in Exhibit SG-8 (Zvirbulis), and in addition to normal core responsibilities, multiple staff members were required to absorb the escalating Operable Unit (OU) management and duties year over year. The Project Manager position was established to consolidate the duties under one centralized position, establishing a primary liaison to effectively and efficiently manage this important workload, allowing other staff to thoroughly perform their key functions and duties required of their positions.
- b. A primary representative or liaison did not exist. The responsibility for these functions was inefficiently delegated across multiple positions including the LAC Operations Manager, Water Treatment Superintendent, Water Treatment Supervisor, and the Water Quality Superintendent with assistance and support from the Company's executive staff.
- c. A dedicated position for providing high level grant administration did not exist. Prior to promoting David Van to this position, the responsibility was delegated to multiple management and executive level staff members as described in Response 3b. above.
- d. In the past this effort was shared between the LAC Operations Manager, Water Treatment Superintendent, Water Quality Superintendent and staff from the Engineering Department depending on varying workloads and availability.
- e. In addition to Response No. 3a, SGVWC has realized numerous advantages and efficiencies associated with the Water Resources Project Manager position. Efficiency has improved as specific tasks receive undivided attention, leading to quicker decision-making and a more streamlined process. As the sole representative and liaison, David Van has accepted full accountability and responsibility for the outcomes and progress of his tasks. Additionally, SGVWC has seen improvements in communication and coordination challenges with affected outside entities. Additionally, focused oversight of the above-described duties and responsibilities has resulted in improved overall quality and success in managing our OU's and grants.

- f. No. However, improved efficiencies within the water resources department contribute to overall cost savings, avoided delays and reduced duplication of effort as discussed in Response No. 3e above.
- g. SGVWC conducted an internal evaluation of workloads, department needs and cost impacts of the proposed positions to support application file "EXHIBIT SG-8 (Zvirbulis). Refer to response to data request /TGE-007 Attachment D – 2024.2025 GRC Positions Evaluation.pdf/.
- h. Refer to /TGE-009 ATTACHMENT 2-Water Resources Project Manager.pdf/, specifically the job duties and essential functions included in job description. These duties constitute a full-time position for each division starting in 2024.

SGVWC maintains focus on overall job performance and outcomes rather than mandating the documentation of specific daily, weekly and monthly tasks; therefore, this specific data is not compiled in the requested format.

- i. If not approved, SGVWC will face the following challenges:
 - Inefficiency and Delays: Fragmented project management of the OU's will lead to inefficiencies and delays, as existing staff are overwhelmed by responsibilities beyond their core duties.
 - Reduced Accountability: Without a dedicated representative and liaison, lack of clarity in ownership and oversight responsibilities will result in missed deadlines and incomplete tasks.
 - Compliance Risks: Specialized attention is needed to manage complex regulatory requirements, operating agreements and grant requirements. Without this position, SGVWC risks non-compliance, breach of contract or potential grant revocation.
 - Stakeholder Coordination Challenges: Effective communication with stakeholders is crucial. A dedicated manager avoids communication gaps and ensures consistent engagement, which is vital for ensuring on-going compliance, securing approvals and funding.
 - Strain on Existing Staff: Overburdening current staff will lead to burnout and decreased productivity and efficiency, further exacerbating operational challenges.
- j. Improvements observed thus far are listed in Response No. 3e. SGVWC completes annual employee performance appraisals for all Company staff that measure changes, growth or regression. This will be implemented for the Water Resources Project Manager position as well. Please see /TGE-009 ATTACHMENT 3-Employee Performance Appraisal.pdf/ for the template used to complete these appraisals.

Mehboob Aslam
Response to TGE-009

-7-

March 28, 2025

RESPONDING WITNESSES: Zvirbulis, Fealy

Please call me at (626) 448-6183 with any questions regarding this information.

Sincerely,

/s/ Joel M Reiker

Joel M. Reiker
Vice President, Regulatory Affairs

Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)

/encl.

Attachment 2-5: Water Resources Project Manager Job Description

PROJECT MANAGER-WATER RESOURCES – GENERAL DIVISION

JOB SUMMARY

Under the direct supervision of the Director of Water Resources, the Project Manager – Water Resources works within the Water Resources Department and represents the Company at Baldwin Park Operable Unit, South El Monte Operable Unit, Whittier Narrows Operable Unit, Puente Valley Operable Unit and Mid-Valley Sanitary Landfill groundwater clean-up meetings and administers grant funding requirements for a multitude of projects across the Los Angeles County and Fontana Water Company operating divisions.

JOB DUTIES AND ESSENTIAL FUNCTIONS

Responsible for a variety of tasks and duties, which may include, but would not be limited to, the following:

- Attend meetings as the Company's representative with regulatory agencies, Cooperative Respondents, Responsible Parties and various grant funding agencies.
- Collect necessary data from various departments as needed.
- Develop and maintain effective working relationship with consultants, government, regulatory and permitting agencies and departments, other water utilities and agencies, utilities, service providers, political liaisons and vendors.
- Maintain working knowledge of the Company's various operating agreements, settlement decisions, related treatment systems and the operating costs associated with these systems.
- Stay informed of changing grant funding opportunities and requirements while working closely with partnering agencies.
- Coordinate and collect necessary information to prepare, review and submit annual budgets, invoice packages, and various submittal packages related to clean-up operations and grant requirements as needed.
- Provide complex administrative support to management.
- Protect and enhance Company's water supplies to ensure long term source reliability that meets all applicable and future drinking water standards.
- Coordinate and manage all aspects of assigned projects to assure timely completion.
- Investigate and resolve water quality issues as necessary.
- Other tasks and duties as directed.

SKILLS, KNOWLEDGE AND PHYSICAL REQUIREMENTS

Skills, knowledge and physical requirements include, but are not limited to:

- Thorough knowledge of existing operating agreements, settlement decisions, and awarded grants that govern the Company's role in remediation of the basin.
- Thorough knowledge of operations, operating characteristics and design of each plant and the operating relationship of each plant to system demand.
- Thorough familiarity with the company's water treatment facilities.
- Thorough knowledge of California Department of Drinking Water ("DDW") requirements for protecting the public health including sanitary procedures for disinfecting wells, reservoirs and pipelines.
- Familiarity with federal, state and county health requirements and OSHA regulations.
- Knowledge of and experience in chemistry, electricity and electronics, and general knowledge of manufacturing processes which may constitute health hazards when connected to water supply facilities.
- Thorough familiarity with safety practices and procedures.
- Ability to review, comprehend and prepare various technical documents.
- A neat and professional appearance.
- Must be dependable, punctual, and have good attendance.
- Ability to communicate effectively orally and in writing, to write legibly, have good reading comprehension, and research and make recommendations to management.
- Ability to perform repetitive physical activities including sit, stand, or walk for moderate periods of time, use personal computer, reach, grasp, push, pull, lift up to 20 lbs., stoop, bend, climb, crouch, squat and twist.

EDUCATION, TRAINING AND EXPERIENCE

The following are required:

- High school diploma.
- Valid California driver's license and acceptable driving record.
- DDW Grade T3 Water Treatment Operator and Grade D3 Water Distribution Operator certificates required.

The following attributes are desired:

- DDW grade T5.
- Undergraduate degree.

Attachment 2-6: SGVWC Blank Employee Performance Appraisal Form

SAN GABRIEL VALLEY WATER COMPANY EMPLOYEE PERFORMANCE APPRAISAL

DATE OF THIS APPRAISAL: _____

NAME _____	DATE EMPLOYED _____	DATE OF LAST APPRAISAL _____
REASON FOR APPRAISAL: <input type="checkbox"/> Annual <input type="checkbox"/> Step Increase <input type="checkbox"/> Other _____		
POSITION _____	DIVISION _____	DEPARTMENT _____

Explanation of RATING

- 1 = Performance is exceptional and consistently exceeds expectations.
 2 = Performance and results are high quality and often exceed expectations.
 3 = Meets performance standards; has achieved competent and dependable level of performance.
 4 = Does not always meet job performance standards and needs to improve; needs supervision for complete and timely results.
 5 = Not satisfactorily performing job requirements; needs immediate improvement.

PERFORMANCE CATEGORY	RATING	COMMENTS AND RECOMMENDATIONS
ACCURACY / QUALITY – Consider correctness and thoroughness of work results when compared to established procedures and job requirements	1 2 3 4 5 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
PRODUCTIVITY – Consider employee's ability to consistently keep pace with expected workload and to complete all work in a timely manner	1 2 3 4 5 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
JOB KNOWLEDGE – Consider the depth and breadth of information employee has relating to duties, processes and procedures required for competent performance	1 2 3 4 5 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
COOPERATION / TEAMWORK – Consider willingness to assist others, share information, work toward common goals, interact effectively with co-workers, and contribute to a harmonious work environment	1 2 3 4 5 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
INITIATIVE – Consider resourcefulness and ability to take the initiative, be self-starting and to work without direction, or whether employee depends on other employees	1 2 3 4 5 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
ATTENDANCE – Consider promptness, conformity to work hours and break periods, dependability in reporting to work every day.	1 2 3 4 5 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Number of days absent during appraisal period: _____
LEARNING CAPABILITY – Consider resourcefulness and ingenuity, and how quickly new routines and explanations are comprehended and adapted, and the ability to retain knowledge	1 2 3 4 5 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	

COMMUNICATIONS - Consider ability to effectively communicate critical information to other employees and supervisors	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/>	
SERVICE ORIENTATION - Consider concern for positive interaction with customers and other contacts within scope of duties, desire to resolve problems, and understanding of value of good service	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/>	
ADHERENCE TO POLICY AND PROCEDURE - Consider employee's ability to properly interpret and apply company policies and comply with instructions and procedures; adherence to safety rules; appropriate appearance and grooming	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/>	
JUDGEMENT / ANALYTICAL CAPABILITY - Consider employee's ability to find and interpret facts, use careful analysis and exercise good judgement in a variety of situations	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/>	
FOR MANAGEMENT/SUPERVISORY EMPLOYEES ONLY		
SUPERVISORY CAPABILITY - Consider ability to supervise, direct, lead, and earn the respect of subordinates	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/>	
EMPLOYEE RELATIONS / PROBLEM RESOLUTION - Consider ability to handle and effectively resolve problems, interpret policy and procedure, and maintain a positive work environment	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/>	
ABILITY TO MOTIVATE - Consider ability to motivate, train, and appropriately utilize subordinates to attain required results	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/>	

OVERALL RATING

Consider all of the above categories and check the box that most closely rates this employee's total performance.

1
☐
2
☐
3
☐
4
☐
5
☐

Manager/Supervisor signature	Date	Department Head signature	Date
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EMPLOYEE COMMENTS:

Employee Signature

Date

PerfApprs1/1/2001

CONFIDENTIAL Attachment 2-7: Response to TGE-016

SAN GABRIEL VALLEY WATER COMPANY

May 22, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: **Response to Data Request No. TGE-016 (Water Resources Project Manager 2)**

Dear Mr. Aslam:

In response to your data request dated May 15, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

Please refer to SGVWC's response to Data Response TGE-009 Water Resources Project Manager. Please answer the following questions.

- a. Please provide a detailed description of all job duties and responsibilities for the each of the following positions in Los Angeles County (LAC) Division.
 - i. LAC Operations Manager
 - ii. Water Treatment Superintendent
 - iii. Water Treatment Supervisor
 - iv. Water Quality Superintendent
- b. Please provide a detailed description of an "Operable Unit." Please explain in detail the purpose of an Operable Unit. If available, please provide the testimony and page numbers where SGVWC explains an Operable Unit in its application.
- c. Are there any additional project management activities, projects, or other activities, in each of the Baldwin Park, South El Monte, Puente Valley and the Whittier Narrows Operable Units, that are temporary in nature? If the answer is "yes," please identify each specific temporary project management activity, project, and/or other activity, as well as identify the specific Operable Unit that each one falls under. Please also provide a detailed description, the start

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date, and the projected end date for each temporary project management activity, project, and/or other activity.

- d. Please also identify and provide a detailed description for any permanent project management activity, project, and/or other activity for each of the Baldwin Park, South El Monte, Puente Valley and the Whittier Narrows Operable Units. If applicable, please also provide start dates for each project management activity, project, and/or other activity.
- e. Please provide a detailed description and explain the purpose of the "Mid-Valley Sanitary Landfill Clean-Up in the FWC division." If available, please provide the testimony and page numbers where SGVWC explains the Mid-Valley Sanitary Landfill Clean-Up in its application. If the Mid-Valley Sanitary Landfill Clean-Up is temporary in nature, please also provide the start date and projected end date for the landfill clean-up.
- f. Are there any additional project management activities, projects, or other activities in the Mid-Valley Sanitary Landfill Clean-Up that are temporary in nature? If the answer is "yes," please identify each specific temporary project management activity, project, and/or other activity, as well as provide a detailed description for each. Please also provide the start date and end date for each temporary project management activity, project, and/or other activity.
- g. Please also identify and provide a detailed description for any permanent project management activity, project, and/or other activity for the Mid-Valley Sanitary Landfill Clean-Up. If applicable, please also provide start dates for each project management activity, project, and/or other activity.
- h. SGVWC proposes that the new Water Resources Project Manager position will be placed in the LAC Division. Please explain in detail why this LAC position will be the primary representative and liaison for management of the Mid-Valley Sanitary Landfill Clean-Up, even though this is located in SGVWC's Fontana Division.

RESPONSE NO. 1:

- a. Refer to \TGE-016 Attachment A – LAC Division Job Descriptions.pdf\.
- b. San Gabriel's Los Angeles County division wells which produce water from the Main San Gabriel groundwater basin ("Main Basin") are within areas in the San Gabriel valley which the U.S. Environmental Protection Agency ("EPA") has identified and placed on its National Priorities List of Superfund cleanup sites. The EPA classifies these Superfund sites as "Operable Units." An Operable Unit is a listed Superfund cleanup area defined by EPA in which industrial or commercial companies (principally defense contractors) have discharged contaminants into the soil and groundwater, thereby requiring a formalized cleanup plan. In the San Gabriel Valley, these Superfund cleanup sites include the Baldwin Park Operable Unit ("BPOU"), El Monte Operable Unit ("EMOU"), South El Monte Operable Unit ("SEMOU"), Puente Valley Operable Unit ("PVOU"), and Whittier

Narrows Operable Unit (“WNOU”), all of which cover portions of San Gabriel's Los Angeles County division service area.

Because most of San Gabriel's roughly 30,000 acre-feet per year of water supplies in the Los Angeles County division must be produced from wells within these areas, the Company is subject to strict cleanup plans. San Gabriel must conform its groundwater production, treatment, and related operations to such plans which require it to pump water from highly contaminated areas. Settlement agreements related to the BPOU, PVOU and SEMOU are provided in the folder \TGE-016 Operable Unit Settlement Agreements\.

EXHIBIT SG-4 (Reiker), p. 26 at 21 – p. 27 at 8 – Discusses how reimbursements for operating expenses received from third parties to operate treatment facilities in the various operable units are recorded on the Company's books.

EXHIBIT SG-5 (Harris), p. 26 at 12 – p. 30 at 27 – Discusses costs incurred and recoveries received from third parties for operating groundwater treatment plants in the various operable units.

- c. None of the project management activities, projects, or other activities in each of the BPOU, SEMOU, PVOU or WNOU are temporary in nature. There are no ending dates for any of these cleanup plans.
- d. BPOU (Plants B5 and B6)
 - Plant B5 – PFAS Contamination (O&M)
Project Management Activity: Conduct investigation on how PFAS will affect the change out triggers for the GAC and IX systems to inform negotiations with the responsible parties making PFAS treatment a reimbursable treatment cost. Timeframe: April 2025 – March 2026.
 - Plant B6 – Installation of Replacement Air Strippers (Capital Project and O&M)
Existing air strippers have outlasted their useful life and no longer remove VOCs to non-detect levels as originally designed. Various investigational work was conducted to identify and resolve the issue without success. Negotiations were conducted with the Cooperative Respondents (“CRs”) with them ultimately agreeing to replace the existing air strippers. Final approval of this project by the CRs and stakeholders occurred in December 2024. Additionally, San Gabriel submitted a grant application to the Water Quality Authority (“WQA”) in February of 2025 and has been awarded \$1.0M as of May 2025.

Capital Project Management Activity: Manage grant requirements and collaborate with others on design, construction, and permitting of the new air strippers ensuring project schedule is maintained. Track ongoing capital costs to ensure full reimbursement by the CRs and grantor in a timely manner., Timeframe: November 2013 – December 2027

O&M Project Management Activity: Track ongoing O&M costs and performance of new air strippers and report results to CRs demonstrating cost savings and performance efficiencies Also, ensure prompt billing and payment of reimbursable costs by CRs. Timeframe: Ongoing upon DDW final permitting of new air strippers.

- Plant B6 – Installation of UVFlex System (Capital Project and O&M)
Existing Low Pressure UV system has outlasted its useful life and is inefficient requiring increased energy and maintenance. Two new UVFlex units were installed in its place utilizing grant funding from DFA and WQA, which require less energy, maintenance, and lamp replacement.

Capital Project Management Activity: Manage grant requirements, and collaborate with others on the design, construction, and permitting of the new UVFlex System ensuring project schedule is maintained. Track ongoing capital costs to ensure reimbursable costs are billed to the CRs and grantor in a timely manner and are paid on time while staying within budget. Timeframe: July 2018 – June 2025

O&M Project Management Activity: Track ongoing O&M costs and performance of the UVFlex System and report results to CRs demonstrating cost savings and performance efficiencies are realized. Also, ensure reimbursable costs are billed to the CRs and paid in a timely manner. Timeframe: Ongoing upon DDW final permitting of the UVFlex System.

- BPOU Project Agreement Renegotiation
The current 2017 BPOU Project Agreement will expire in 2027. Beginning in January 2025, all BPOU water entities began meeting regularly to develop a framework for a term sheet for negotiation with the CR's for renewal prior to 2027.

Project Management Activity: Review the 2017 BPOU Project Agreement in its entirety and make recommendations to Company management on recommended amendments. Attend regular strategy discussions with the BPOU stakeholders and provide feedback and make recommendations as necessary. Timeframe: January 2025 – January 2028

- BPOU 2026 O&M Budget Negotiations

Prepare annual budgets for O&M at Plants B5 and B6 and negotiate approval with Cooperative Respondents.

Project Management Activity: Gather budgetary data and forecast required O&M budget for subsequent years. Review internally with management, meet with CRs weekly to review budgets and revise as necessary. Timeframe: Annually in June through September.

SEMOU (Plant No. 8)

- SEI MOU 5-Year Budget and Operating Agreement Negotiations

The existing SEMOU Operating Agreement and budget with the Environmental Protection Agency has expired. The WQA”) and the Water Entities within the SEMOU are working with the California Department of Toxic Substances Control (“DTSC”) to develop a new a 5-Year budget and Operating Agreement.

Project Management Activity: Gather O&M budgetary data for Plant No. 8 and forecast an O&M budget for 5 years (2025 – 2029). Review and discuss with internal management to finalize budget. Meet with WQA, DTSC, and the other Water Entities weekly to negotiate final budget and Operating Agreement terms. Timeframe: September 2024 to July 2025.

- Plant No. 8 PFAS IX Treatment System (Capital Project)

Four of the five groundwater wells at Plant No. 8 are impacted by PFAS contamination and San Gabriel unable to utilize these sources to their full capacity without new PFAS treatment. The inability to utilize these sources inhibits San Gabriel from achieving contractual extraction targets prescribed in the Interim Record of Decision (“IROD”) to contain the SEMOU contamination plume and reduces available water resource to meet demands. A grant application for funding to build a PFAS IX system was submitted to WQA in February 2025 and has been awarded \$2.0M as of May 2025.

Capital Project Management Activity: Manage the grant administration, collaborate with others on the design, construction, and permitting of the new PFAS IX Treatment System ensuring project remains on schedule. Track ongoing capital costs to ensure reimbursable costs are billed to the grantor in a timely manner and paid on time. Timeframe: November 2024 – December 2027.

PVOU (Plants B7, B11, B24)

- Destruction of Well B11B

Pursuant to the PVOU Agreement with Northrop Grumman, San Gabriel must destroy Well B11B within 90 days of Northrop Grumman's Intermediate Zone Remedy Facility going into service.

Capital Project Management Activity: Collaborate with Northrop Grumman, EPA, WQA, internal staff, applicable regulatory agencies and contractors on the timely destruction of Well B11B following the Intermediate Zone Remedy Facility final permitting by DDW. Timeframe: November 2024 – September 2025.

- Carrier Shallow Zone Reinjection Well Test

Carrier (responsible party for PVOU Shallow Zone contamination) proposed using San Gabriel's fire hydrant to test their reinjection well and requested San Gabriel to review/approve test protocol and provide comments.

Capital Project Management Activity: Discussed the test protocol and concerns with San Gabriel management team, WQA, Watermaster, EPA and DDW to receive feedback and identify concerns. Provide a response to Carrier and facilitate formulation of a more protective testing protocol for their injection well. Timeframe: December 2024 – December 2025.

- Reactivation of the B7 Air Stripper and Construction of Connecting Pipelines from B24 wells to the B7 Air Stripper

Wells B24A and B24B have been impacted by VOC contamination in recent years. Since the B7 air stripper has been inactive and unavailable to treat VOCs from the B24 wells, the LAC Operations department has started the process to reactivate the air stripper and install new pipelines to deliver B24 well supply to the air stripper for VOC treatment. Secured grant funding of \$200K for the capital costs and up to \$4.7M for O&M costs through February 2029.

Project Management Activity: Manage administration of grants for capital and O&M costs. Assist LAC Operations department with design, construction, and permitting of the new pipelines and reactivation of the B7 air stripper. Track ongoing capital costs to ensure reimbursable costs are billed to the grantors in a timely manner, paid on time, and within budget. Timeframe: October 2023 – February 2029.

WNOU (Whittier Narrows Treatment Plant)

- WNOU 5-Year Budget and Operating Agreement Negotiations

The existing WNOU 5-Year Operating Agreement and budget with DTSC has expired. San Gabriel is working directly with DTSC to renew another 5-Year Operating Agreement and budget.

Project Management Activity: Gather O&M budgetary data for WNOU Treatment Plant and forecast an O&M budget for 5 years (2025 – 2029). Review and discuss with internal management to finalize a budget. Meet with DTSC weekly to negotiate the budget and Operating Agreement terms. Revise as necessary and finalize agreement. Timeframe: September 2024 to July 2025.

- WNOU TDS Blendline Project Agreement

The groundwater sources at the WNOU Treatment Plant have total dissolved solid (“TDS”) concentrations above the secondary maximum contaminant level of 500 ppm. DDW will not allow San Gabriel to serve this water to its customers unless the WNOU treatment water is blended with San Gabriel’s low TDS distribution water to reduce the overall TDS concentration below 500 ppm prior to serving the customers. DTSC received grant funding to build new pipelines to bring low TDS water from San Gabriel’s distribution system into the WNOU Treatment Plant to blend TDS levels under 500 ppm prior to delivering the finished water to San Gabriel’s distribution system for potable use. San Gabriel was contracted by DTSC to complete this blendline project.

Project Management Activity: Gather capital budgetary data, preliminary design, and submittal documents for the TDS Blendline Project and provide to DTSC for grant submittal requirements. Work with San Gabriel’s management team and DTSC on finalizing a TDS Blendline Construction Agreement. Collaborate with San Gabriel’s Engineering, Operations, and Water Quality departments; DTSC and its consultants; EPA; and various subcontractors to design, construct, and permit the TDS Blendline Project. Track ongoing capital costs to ensure reimbursable costs are billed to DTSC in a timely manner, paid on time, and within budget. Meet weekly with DTSC and its consultants to provide updates and discuss pending items. Timeframe: July 2022 – June 2026.

- WNOU Plant B28 Booster Station Project Agreement

Upon completion of the WNOU TDS Blendline Project, an additional booster station is required to be constructed to move treated WNOU water to other areas of San Gabriel’s distribution system facilitating the increase of water production from the WNOU wells to ensure containment of the contamination plume. DTSC received grant funding for this project and contracted San Gabriel to complete this B28 Booster Station Project.

Project Management Activity: Gather capital budgetary data, preliminary design, and submittal documents for the B28 Booster Station and provide to DTSC for grant submittal requirements. Work with San Gabriel's management team and DTSC on finalizing the B28 Construction Agreement. Collaborate with San Gabriel's Engineering, Operations, and Water Quality departments; DTSC and its consultants; EPA; and various subcontractors to design, construct, and permit the B28 Booster Project. Track ongoing capital costs to ensure reimbursable costs are billed to DTSC in a timely manner, paid on time, and within budget. Meet weekly with DTSC and its consultants to provide updates and discuss pending items. Timeframe: July 2022 – June 2026.

Other Responsibilities

- Routine OU Project Management Activities

Routine activities associated with all OUs include, but are not limited to, attending all OU related meetings (as frequently as four times weekly); receiving, researching, and responding to all OU related inquiries and disputes; tracking the status and schedules of ongoing repairs to ensure timely completion; tracking O&M, repairs, and maintenance costs to ensure timely billing and payment of these costs; ensuring all OU facilities are operating within the guidelines of the DDW permit, EPA IROD or ROD, and OU Operating Agreements; and pursuing grant funding and complying with all grant requirements. Timeframe: Ongoing.

- e. Pursuant to the settlement agreement between San Gabriel Valley Water Company and the County of San Bernardino, dated November 10, 1998, the County is required to reimburse San Gabriel for the Company's actual recorded costs of operating and maintaining the Plant F-10 treatment facilities to ensure that the water produced from the wells complies with all applicable state and federal safe drinking water standards (*see* \TGE-016 ATTACHMENT 1.e.pdf\ for a copy of the settlement agreement). San Gabriel's operation of the Plant F-10 treatment facilities enables the County of San Bernardino to meet its obligations pursuant to the Regional Water Quality Control Board's Cleanup and Abatement Order 98-96 to contain the volatile organic compound ("VOC") plume emanating from the Mid Valley Sanitary Landfill and remediate contamination in the Fontana Water Company division's water supplies. The Mid Valley Sanitary Landfill contamination cleanup and related Cleanup and Abatement Order are not temporary, as there is no ending date for the work.

EXHIBIT SG-5 (Harris), p. 27 at 1 – p. 32 at 10 – Discusses costs incurred and recoveries received from third parties for operating groundwater treatment facilities at Plant F-10.

- f. None of the project management activities, projects, or other activities related to the Mid Valley Sanitary Landfill Cleanup and Abatement Order are temporary in nature. There is no ending date for this cleanup plan.
- g. None of the project management activities, projects, or other activities related to the Mid Valley Sanitary Landfill Cleanup and Abatement Order are temporary in nature. There is no ending date for this cleanup plan.

Annual F10 Operation and Maintenance (“O&M”) Budget – Prepare, review and approve annual F10 O&M Budget by March 1st of each year.

Monthly O&M Billing – Prepare, review and submit monthly billing to the County of San Bernardino. This includes tracking all applicable costs and collecting information from the Accounting, Operations and Engineering departments.

Monitoring Ongoing Cleanup Efforts – Attend multiple regional meetings that monitor water quality, pumping and management of the Rialto Basin area. This includes the Perchlorate Task Force Meetings, Basin Technical Advisory Committee Meetings, San Bernardino Valley Municipal Water District Board of Director meetings, Rialto Basin Groundwater Council and Tac meetings, and other related Regional Board or legal meetings as needed. This also includes internal meetings with San Gabriel staff, hired outside legal counsel and technical experts to ensure compliance with applicable agreements and orders.

RESPONDING WITNESSES: Zvirbulis, Fealy

REQUEST NO. 2:

In response to TGE-009 Question 3b, SGVWC writes “A primary representative or liaison did not exist. The responsibility for these functions was inefficiently delegated across multiple positions including the LAC Operations Manager, Water Treatment Superintendent, Water Treatment Supervisor, and the Water Quality Superintendent with assistance and support from the Company’s executive staff.” Did SGVWC specifically assign each of the Baldwin Park, South El Monte, Puente Valley and the Whittier Narrows Operable Units, and the Mid-Valley Sanitary Landfill Clean-Up, to each of these positions? If the answer is “yes,” please identify which of these positions had liaison and representative responsibilities for each of these LAC Operable Units and for Fontana’s Mid-Valley Sanitary Landfill Clean-Up. If the answer is “no,” please explain in further detail how these positions conducted management of these Operable Units and Mid-Valley Sanitary Landfill Clean-Up for the years 2020 through 2024.

RESPONSE NO. 2:

No. As stated in TGW-009 Response 3b, a primary representative or liaison did not exist and the responsibility for OU related functions was ineffectively delegated across multiple positions in addition to other daily responsibilities as described in the respective Job Descriptions included in \TGE-016 Attachment A – LAC Division Job Descriptions.pdf\ . The inadequate management of these activities was delegated to staff based on availability from time to time and task

knowledge. These positions were not involved and did not support the Mid-Valley Sanitary Landfill Clean-Up.

RESPONDING WITNESSES: Zvirbulis, Fealy

REQUEST NO. 3:

In response to TGE-009 Question 3e, SGVWC writes:

In addition to Response No. 3a, SGVWC has realized numerous advantages and efficiencies associated with the Water Resources Project Manager position. Efficiency has improved as specific tasks receive undivided attention, leading to quicker decision-making and a more streamlined process. As the sole representative and liaison, David Van has accepted full accountability and responsibility for the outcomes and progress of his tasks. Additionally, SGVWC has seen improvements in communication and coordination challenges with affected outside entities. Additionally, focused oversight of the above-described duties and responsibilities has resulted in improved overall quality and success in managing our OU's and grants.

Please answer the following questions.

- a. Please explain in detail the communication and coordination challenges with affected outside entities that SGVWC saw prior to the appointment of the Water Resources Project Manager that occurred for the years 2020 through 2024. Describe in detail how the position alleviated these challenges. Please also provide supporting documentation for these improvements. Please also identify the specific affected outside entities, as well as provide the specific dates for when these challenges occurred.
- b. Please describe in detail the how the Water Resources Project Manager "improved overall quality and success in managing" SGVWC's OU's and grants. Please identify specific problems with management of SGVWC's OU's and grants that occurred prior to appointing the Water Resources Project Manager for the last five years from 2020 through 2024.

RESPONSE NO. 3:

- a. Prior to having a sole OU representative and liaison, outside entities (such as the Water Quality Authority, Main Basin Watermaster, EPA, DTSC, EPA, Cooperative Respondents, and other Water Entities) would contact the Operations Manager, Treatment Superintendent, and Water Quality Superintendent as a group to inquire about various OU related questions or tasks. This often led to confusion about responsibility to respond or multiple people duplicating effort in response, contributing to delays and confusion for both internal staff and outside agencies.

Since appointing David Van as the Project Manager to handle all OU related responsibilities, outside entities were informed to direct all OU inquiries to him. All communication and responses are funneled through this one dedicated position that can gather the relevant information and provide a response in a timely manner. David will receive an annual employee performance appraisal following one year in this position. The improvements such as expediting responses and tasks while clearing up communication between internal staff and external agencies will be noted. Until then, no such documentation is available.

- b. Refer to TGE-009 Response 3a, e and f that responds to the improved overall quality and success in managing SGVWC's OU's and grants. In addition to the above response to Question 2a., TGE-009 Response 3b and I that highlights specific problems with the prior method of management, most of which was observed prior to appointing David Van as the Water Resources Project Manager. Specific events over the last five years have not been compiled in the requested format.

RESPONDING WITNESSES: Zvirbulis, Fealy

REQUEST NO. 4:

Please refer to SGVWC's responses to TGE-009 Question 3i and answer the following questions.

- a. SGVWC writes "Fragmented project management of the OU's will lead to inefficiencies and delays, as existing staff are overwhelmed by responsibilities beyond their core duties." Please provide specific examples of "inefficiencies and delays" in the management of SGVWC OU's and Fontana's Mid-Valley Sanitary Landfill Clean-Up that occurred from 2020 and 2024, prior to the appointment of the Water Resources Project Manager. Please also identify if any of the affected project management activities, projects, and other activities are temporary or permanent in nature as discussed previously in Questions 1c, 1d, 1f, and 1g for SGVWC OU's and Fontana's Mid-Valley Sanitary Landfill Clean-Up.
- b. SGVWC writes "Reduced Accountability: Without a dedicated representative and liaison, lack of clarity in ownership and oversight responsibilities will result in missed deadlines and incomplete tasks." Please provide specific examples of missed deadlines and incomplete tasks that occurred from 2020 and 2024, prior to the appointment of the Water Resources Project Manager.
- c. SGVWC writes "Compliance Risks: Specialized attention is needed to manage complex regulatory requirements, operating agreements and grant requirements. Without this position, SGVWC risks non-compliance, breach of contract or potential grant revocation." Please provide specific examples of non-compliance, breach of contract or potential grant revocation that occurred from 2020 and 2024, prior to the appointment of the Water Resources Project Manager.
- d. SGVWC writes "Stakeholder Coordination Challenges: Effective communication with stakeholders is crucial. A dedicated manager avoids communication gaps and ensures

consistent engagement, which is vital for ensuring on-going compliance, securing approvals and funding.” Please provide specific examples of communication gaps with stakeholders that negatively affected SGVWC’s ability to ensure compliance and secure approvals and funding that occurred from 2020 and 2024, prior to the appointment of the Water Resources Project Manager. Please also identify all related stakeholders involved in these communication gaps, as well as identify all other stakeholders involved with LAC’s Operable Units, FWC’s Mid-Valley Sanitary Landfill Clean-Up, and other stakeholders with whom the Water Resources Project Manager would communicate with.

RESPONSE NO. 4:

- a. Please see the response to Question 3b regarding fragmented project management and delays relating to SGVWC OUs. The Fontana Division’s Water Resources Manager currently handles the Fontana Mid-Valley Sanitary Landfill Clean-Up. The Water Resources Project Manager will assist with this project in the future as necessary. All the project management activities are permanent in nature.
- b. One example of project delays caused by not having a dedicated representative is the Plant B6 Replacement Air Stripper project which took more than a decade to resolve with the Cooperative Respondents and reaching agreement to replace the existing air strippers with improved facilities. SGVWC was required to conduct various investigational work and prepare a feasibility study as justification to the CRs and various stakeholders (WQA, WM, EPA) that the air strippers were inefficient and needed to be replaced. This work was delayed due to staff being inundated with their primary responsibilities and other ongoing OU and non-OU capital projects. A dedicated representative focusing on OU projects would have had primary focus on completing the investigational work and feasibility study to present to the CRs and stakeholders and facilitate more regular discussions to move this project forward.

Other examples include delays in receiving Permits for Operation of Plant B6 and Plant No. 8 UVFlex systems. San Gabriel’s Water Quality Superintendent and Operations Manager were pulled away from their day-to-day duties and permit oversight to assist with ongoing OU related tasks and inquiries.

- c. There have been no documented cases of noncompliance with regulatory requirements specific to OU’s, operating agreements, and grant requirements. San Gabriel is committed to taking a proactive approach, rather than a reactive one, to anticipate and mitigate potential future failures. This forward-thinking strategy substantiates the necessity and strategic value of this proposed position. Having dedicated staff such as the Water Resources Project Manager who specializes in these requirements will ensure the SGVWC stays in compliance.
- d. There was no compliance issue to reference. Refer to the response in Question 4b regarding negative effects in securing approvals and funding.

The stakeholders involved in communication with all LAC OUs include WQA, Main San Gabriel Basin Watermaster, EPA, DTSC, DDW, Regional Water Quality Control Board, Valley County Water District, La Puente Valley County Water District, Suburban Water Systems, California Domestic Water Company, City of Industry, City of Monterey Park, City of Whittier, Golden State Water Company, Central Basin Watermaster, Water Replenishment District, and the various Cooperative Respondents and Responsible Parties in the BPOU and PVOU.

The Water Resources Project Manager has no communication with the stakeholders of the FWC's Mid-Valley Sanitary Landfill Clean-Up at this time.

RESPONDING WITNESSES: Zvirbulis, Fealy

Please call me at (626) 448-6183 with any questions regarding this information.

Sincerely,

/s/ Joel M Reiker

Joel M. Reiker
Vice President, Regulatory Affairs

Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)

/encl.

Attachment 2-8: TGE-007 Attachment B LA Division Outside Services from 2020-2024

Contractor Name	Date of Service	Cost of Service	Account Number	Capitalized Expense/ID Year	Internal Notes	Department
2020						
N. Line	1/30/2020	\$ 55,000.00	9859.55	Capitalized	Prepare and submit grant applications	Water Resources/Grant
Stetson Engineers, Inc.	2020	\$67,717.85	7549.15	Capitalized	Sampling for Title 22 and Monitoring Orders (Main Basin)	Water Quality
John Robinson Consulting, Inc.	3/1/2020 - 3/31/2020	\$ 5,760.00	8856.81	Capitalized	SRM RW Phase 1	Water Resources
Stetson Engineers, Inc.	5/1/2020 - 12/31/2021	\$ 28,705.50	8556.1	Expensed - 78750	UAPMP - 2020	Water Resources
DECE Inc.	11/02/2020 - 4/09/2021	\$ 18,885.00	8556.1	Expensed - 78750	Sanctus Area Population Projection Study	Water Resources
Stetson Engineers, Inc.	7/2/2020 - 10/06/2020	\$ 4,460.00	8575.3	Expensed - 78605	Water Loss Audit - 2020	Water Resources
2021						
Stetson Engineers, Inc.	10/29/2021 - 1/31/2021	\$ 4,360.00	8175.3	Expensed - 78605	Water Loss Audit - 2021	Water Resources
Stetson Engineers, Inc.	2021	\$10,899.33	7549.15	Capitalized	Sampling for Title 22 and Monitoring Orders (Main Basin)	Water Quality
2022						
Stetson Engineers, Inc.	3/18/2022 - 7/28/2022	\$ 7,448.25	8821.53	Expensed - 78605	AQSEA - 2022	Water Resources
DECE Inc.	6/29/2022 - 10/24/2022	\$ 22,100.00	8821.53	Capitalized - 77960	NFI Identification Services	Water Resources
DECE Inc.	8/9/2022 - 10/19/2022	\$ 2,600.00	8886.53	Expensed - 77960	NFI Identification Services	Water Resources
Stetson Engineers, Inc.	8/21/2022 - 8/28/2022	\$ 4,735.00	8175.3	Expensed - 78605	Water Loss Audit - 2021	Water Resources
Stetson Engineers, Inc.	2022	\$6,585.00	7549.15	Capitalized	Sampling for Title 22 and Monitoring Orders (Main Basin)	Water Quality
2023						
Stetson Engineers, Inc.	5/1/2023 - 7/31/2023	\$ 7,185.75	8821.53	Expensed - 78605	AQSEA - 2023	Water Resources
Stetson Engineers, Inc.	10/02/2023 - 12/31/2023	\$ 4,860.00	8175.3	Expensed - 78605	Water Loss Audit - 2022	Water Resources
Stetson Engineers, Inc.	2023	\$3,250.00	7549.15	Capitalized	Sampling for Title 22 and Monitoring Orders (Main Basin)	Water Quality
Stetson Engineers, Inc.	2023	\$3,935.25	8175.3	Capitalized	87-601 Report for No. 8 Permit	Water Quality
2024						
Green Acres Cribbell	10/2/2024 - 7/15/2024	\$ 2,100.00	74041.43	Capitalized	Reservoir Drilling Investigation Pilot Program	Water Resources
Stetson Engineers, Inc.	4/18/2024 - 7/31/2024	\$ 8,060.00	8821.53	Expensed - 78605	AQSEA - 2024	Water Resources
John Robinson Consulting, Inc.	5/20/2024 - Ongoing	\$ 13,250.00	10115.61	Capitalized	SRM RW Tech Memo	Water Resources
Habitat Water Management	8/2/24 - 12/2/24	\$ 4,000.00	778.02	Expensed - 77960	Water Loss Audit Review 2022/2023	Water Resources
Stetson Engineers, Inc.	7/2/2024 - 12/2/2024	\$ 5,000.00	8177.8	Expensed - 78605	Water Loss Audit - 2023	Water Resources
Water Resources Management Services	8/1/2024 to 12/30/2024	\$ 75,225.00	789.05	Expensed - 78605	Consulting Services	Water Resources
Stetson	2024	\$3,800.00	8886.53	Capitalized	Progress Reporting and NRI (Grants)	Water Resources/Grant
Stetson Engineers, Inc.	2024	\$ 1,360.50	7549.15	Capitalized	Sampling for Title 22 and Monitoring Orders (Main Basin)	Water Quality
Stetson Engineers, Inc.	2024	\$6,152.50	8175.3	Capitalized	87-601 Report for No. 8 Permit	Water Quality
Blaw Drilling	2024	\$8,580.00	102301.1	AS Memo Acc/Excluded from reactive WBS Sampling Services (PFAS)		Water Quality
Blaw Tech	2024	\$ 6,300.00	102302.2	AS Memo Acc/Excluded from reactive WBS Sampling Services (PFAS)		Water Quality

Attachment 2-9: TGE-007 Attachment C

Regulations from 2015-2024

Timeline – Reporting Requirements for California Water Utilities

2010s: Drought-Era Monthly Reporting & Water Loss Audits

- **2014:** SWRCB imposes **monthly urban water production & conservation reporting** (started with June 2014 data) under emergency drought regulations.
 - Internal staff gathered information and submitted monthly reports.
- **2015: Senate Bill 555** requires **annual Water Loss Audits**, effective Jan 2016.
- **2017: First validated Water Loss Audits due** by Oct 1.
 - Hired outside Consultant to complete and submit report. Internal staff to gather data from various departments and compile it for consultant.
- **2018:** CPUC starts collecting **monthly reports on customer shutoffs and arrearages** due to SB 998 compliance.
 - Internal staff gathered information and submitted monthly reports.

2018: SB 606 & AB 1668 – “Making Water Conservation a California Way of Life”

- **2018: SB 606 / AB 1668** enacted, creating several new reporting mandates:
 - **Annual Water Shortage Assessment** (first due July 1, 2022).
 - Hired outside Consultant to complete and submit report. Internal staff to gather data.
 - **Urban Water Use Objective (UWUO) Annual Reporting** (first due Jan 1, 2024).
 - **Permanent Monthly Drought & Conservation Reporting** via SWRCB.
 - Internal staff gathered information and submitted monthly reports that were transitioned to new system.
 - **Water Shutoff Reporting** integrated into the eAR system.
 - Internal reports currently are pen and paper, will need to be converted to digital by recently requested Data Base Coordinator once final digital format is finalized. Will need staff time to complete.

2020s: Integration, Enhanced Audits, and Upcoming Requirements

- **2020:**
 - SWRCB launches **SAFER Clearinghouse Portal** to centralize eAR, monthly conservation, and other reporting.
 - Internal staff gathered information and submitted monthly reports were adapted to the new system.
 - The Online-System continues to change without a changelog or notifications, increasingly consuming staff time as they troubleshoot failed data uploads. Database Coordinator will oversee this in the future.
 - The Database Coordinator will develop a more streamlined process to integrate data across different departmental silos, reducing staff time spent on data gathering.
 - EPA **Risk & Resilience Assessments** certifications required under AWIA 2018.
- **2022:**
 - SWRCB adopts **Water Loss Performance Standards** (targets apply starting in **2028**).
 - CPUC expands **monthly and quarterly reporting** for investor-owned utilities.

Upcoming Reporting Milestones

- **2024:**
 - **First Urban Water Use Objectives (UWUO) Report** due Jan 1.
 - Internal staff gathered information and submitted monthly reports.
 - Several components of the framework with deadlines beyond 2024 will need support tools provided by outside consultants, such as landscape measuring and framework for water budgets for sites.
 - System and internal staff time will be needed to set up and create water budgets that need to be sent to all commercial sites yearly.
 - DWR supplemental **Urban Water Management Plan updates** (SB 606 compliance) due.
- **2028:**
 - **First compliance evaluation** of SB 555 Water Loss Performance Standards (using 2025–2027 data).
 - Hired outside consultant to help create steps to improve internal process to move divisions toward lowering water loss.

- Potential **federal CCR Rule modernization** may require **biannual CCRs** for larger utilities.

Water Quality

- **2016: EPA issues the Federal Revised Total Coliform Rule.**
 - No change in staff needed to comply with changes.
- **2017: 1,2,3, - TCP MCL was adopted**
 - Staff accommodated the additional required sampling.
- **2017: DDW issued Permit Amendment NO. 2017PA-Schools**
 - Requiring water systems to take lead samples at Schools.
 - Challenges arose during this process due to the limited water quality staff, resulting in additional overtime or make-up time and the need for support from other departments. According to the EPA's *3Ts for Reducing Lead in Drinking Water*, lead sample collection requires *first draw* samples, meaning water must remain stagnant in the pipes for at least eight hours before testing. To meet this requirement, additional overtime or make-up time was necessary to ensure staff could begin work before school staff and students arrived.
- **2017: Assembly Bill AB 746**
 - Requiring water systems to take lead samples at Schools.
 - Challenges were encountered during this process due to limited water quality staff, resulting in additional overtime or make-up time and the need for support from other departments. Earlier work hours were required at school sites to ensure that sample locations adhered to proper lead sampling procedures.
- **2019-2020: Unregulated Contaminant Monitoring Rule (UCMR4)**
 - Challenges were encountered during this process due to limited water quality staff, necessitating the use of staff from other departments.
- **2021: Lead and Copper Rule Revision (LCRR)**
- Required water system to complete a Lead Service Line Inventory by October 16, 2024. San Gabriel contracted services from DSCE to upgrade our GIS System and to identify services lines that are pre-1988. In addition to contracting a consultant San Gabriel also hired two temporary staff to assist with the physical inspection of the services due to limited water quality staff.
- **2021: California Revised its Total Coliform Rule**

- No change in staff needed to comply with regulation changes.
- **2024-2025: Unregulated Contaminant Monitoring Rule (UCMR5)**
 - Challenges were encountered during this process due to limited water quality staff, necessitating the use of staff from other departments.
- **2024: PFAS National Primary Drinking Water Regulation**
 - Established MCL's for 5 PFAS compounds and a Hazard Index (mixture of 4 PFAS compounds)
 - Challenges were encountered during this process due to limited water quality staff, necessitating the use of staff from other departments.
- **2024: Lead and Copper Rule Improvements (LCRI)**
 - Sampling and public education will be required at schools and childcare facilities within the water system over a five-year timeframe. This process will follow similar sampling procedures outlined in Permit Amendment No. 2017PA-Schools and AB746, requiring staff to enter sites before students arrive. Due to the inclusion of childcare facilities under the new rule, additional staff will be necessary to meet these expanded requirements.
- **Lead Service Line Inventory** due to U.S. EPA by Oct 16 under the revised Lead and Copper Rule.
- **2024: Chromium 6 MCL is adopted**
 - Challenges were encountered during this process due to limited water quality staff, necessitating the use of staff from other departments.

Cross Connection

- **2024: Cross-Connection Control Policy Handbook**
 - A consultant was hired to assist with the completion of the handbook. Internal staff will provide the required data and review.

Other Ongoing Reporting Requirements

- **eAR** – Annual digital filing via SAFER Clearinghouse.

- **SAFER Monthly Reporting** – Permanent monthly production and conservation reporting.
 - **Water Loss Audits** – Annual via DWR’s **WUEdata portal**.
 - **CCR Water Quality Report** – Annual federal/state mandate. (Switching to 2x annually)
 - **CPUC Annual Report** – Annual for investor-owned utilities.
 - **CPUC Monthly/Quarterly Operational Reports** – For Class A water utilities.
 - **Urban Water Management Plan (UWMP)** – Every 5 years (next major update due 2025).
 - **Annual Water Shortage Assessment Reports** – Annual via DWR (starting 2022).
 - **Water Leak Detection Tracking** – Required in 2028 based on 2025–2027 activity.
 - **Prop 68** - Operations and Maintenance Grant Plant W6 and B24
 - **Prop 1** - B6 UV Flex Capital Project
 - **WRD** - PFAS Remediation Program for W6’s IX system
 - **WQA** - Federal Funding Program Administration
-

Notes:

- Many of these reports transitioned from paper-based to **digital formats** between 2009–2020.
- Future federal regulations (e.g., CCR Modernization, Lead & Copper Rule changes) may further **increase reporting frequency** or **expand digital delivery** requirements.

Sources for Timeline Research

- [SWRCB – Electronic Annual Report \(eAR\) Overview & History](#)
- [U.S. EPA – Consumer Confidence Report Rule \(CCR\)](#)
- [SWRCB – Emergency Drought Regulations for Monthly Reporting \(2014\)](#)
- [SWRCB – Permanent Monthly Reporting Regulation \(2020\)](#)
- [SB 555 \(2015\) – Water Loss Audits Legislative Text](#)
- [AB 1668 / SB 606 \(2018\) – Water Use Efficiency Framework](#)
- [DWR – Urban Water Management Planning Act \(1983\) & Updates](#)
- [SWRCB – Water Loss Performance Standards \(2022\)](#)
- [CPUC – General Order 104-A for Annual Reports](#)
- [CPUC – SB 998 Compliance & Disconnection Reporting](#)
- [U.S. EPA – AWIA 2018 Risk and Resilience Assessment Requirements](#)
- [EPA – Lead and Copper Rule Revisions \(LCRR\) Overview](#)

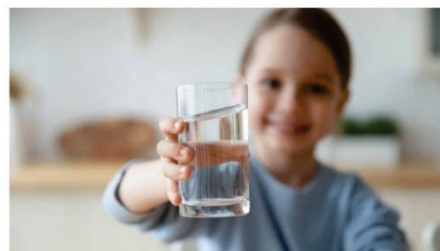
CONFIDENTIAL Attachment 2-10:
TGE-012 Attachment D PA NO.2017PA-Schools and AB 746
Staff Hours

				Year Values									Total Sum of REGULAR HOURS	Total Sum of OVERTIME HOURS	Total Sum of DOUBLETIME HOURS
				2017			2018			2019					
ACCOUNT#	EMPLOYEES	EMPLOYEE NAME	POSITION TITLE	Sum of REGULAR HOURS	Sum of OVERTIME HOURS	Sum of DOUBLETIME HOURS	Sum of REGULAR HOURS	Sum of OVERTIME HOURS	Sum of DOUBLETIME HOURS	Sum of REGULAR HOURS	Sum of OVERTIME HOURS	Sum of DOUBLETIME HOURS			
9803L-1		1165	Center Quality Superintendent (Previous Position)	28.00	-	-	-	-	-	-	-	-	28.00	-	-
		1206	Center Quality Specialist	2.00	-	-	22.00	-	-	5.00	-	-	29.00	-	-
		1217	Center Quality Superintendent (Previous Position)	-	-	-	2.00	-	-	-	-	-	2.00	-	-
		1273	Center Quality Superintendent	8.00	-	-	24.00	-	-	18.00	-	-	60.00	-	-
9803L-1 Total				38.00	-	-	68.00	-	-	23.00	-	-	117.00	-	-
9803L-2		1206	Center Quality Specialist	-	-	-	-	20.00	6.50	-	14.00	5.00	-	34.00	11.50
		1217	Center Quality Superintendent (Previous Position)	-	-	-	-	15.00	4.00	-	-	-	-	19.00	4.00
9803L-2 Total				-	-	-	-	35.00	10.50	-	14.00	5.00	-	53.00	15.50
9806L-1		1273	Center Quality Superintendent	-	-	-	2.00	-	-	-	-	-	2.00	-	-
9806L-1 Total				-	-	-	2.00	-	-	-	-	-	2.00	-	-
9806L-2		1206	Center Quality Specialist	-	-	-	-	1.00	-	-	-	-	-	1.00	-
9806L-2 Total				-	-	-	-	1.00	-	-	-	-	-	1.00	-
91429-1		1206	Center Quality Specialist	-	-	-	2.00	0.50	-	-	-	-	2.00	0.50	-
		1273	Center Quality Superintendent	-	-	-	10.00	-	-	-	-	-	10.00	-	-
91429-1 Total				-	-	-	12.00	0.50	-	-	-	-	12.00	0.50	-

Note: Screenshot retrieved from the Environmental Protection Agency website at <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>. Retrieved May 1, 2025.

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On May 14, 2025, EPA announced the agency will keep the current National Primary Drinking Water Regulations (NPDWR) for PFOA and PFOS. As part of this action, EPA also announced its intent to extend the PFOA and PFOS Maximum Contaminant Level compliance deadlines and establish a federal exemption framework. Additionally, EPA announced its intent to rescind the regulations and reconsider the regulatory determinations for PFHxS, PFNA, HFPO-DA (commonly known as GenX), and the Hazard Index mixture of these three PFAS plus PFBS to ensure the determinations and any resulting drinking water regulation follow the Safe Drinking Water Act process. For more information, see EPA's [Press Release](#).

On April 10, 2024, EPA announced the final NPDR for six PFAS. To inform the final rule, EPA evaluated over 120,000 comments submitted by the public on the rule proposal, as well as considered input received during multiple consultations and stakeholder engagement activities held both prior to and following the proposed rule. EPA expects that over many years the final rule will prevent PFAS exposure in drinking water for approximately 100 million people, prevent thousands of deaths, and reduce tens of thousands of serious PFAS-attributable illnesses.

EPA is also making unprecedented funding available to help ensure that all people have clean and safe water. In addition to the final rule, EPA announced [\\$1 billion in available funding through the Infrastructure Investment and Jobs Act](#) to help states and territories implement PFAS testing and treatment at public water systems and to help owners of private wells address PFAS contamination.

EPA established legally enforceable levels, called Maximum Contaminant Levels (MCLs), for six PFAS in drinking water: PFOA, PFOS, PFHxS, PFNA, and HFPO-DA as contaminants with individual MCLs, and PFAS mixtures containing at least two or more of PFHxS, PFNA, HFPO-DA, and PFBS using a Hazard Index MCL to account for the combined and co-occurring levels of these PFAS in drinking water. EPA also finalized health-based, non-enforceable Maximum Contaminant Level Goals (MCLGs) for these PFAS.

Compound	Final MCLG	Final MCL (enforceable levels) ¹
PFOA	Zero	4.0 parts per trillion (ppt) (also expressed as ng/L)
PFOS	Zero	4.0 ppt
PFHxS	10 ppt	10 ppt
PFNA	10 ppt	10 ppt
HFPO-DA (commonly known as GenX Chemicals)	10 ppt	10 ppt
Mixtures containing two or more of PFHxS, PFNA, HFPO-DA, and PFBS	1 (unitless)	1 (unitless)
	Hazard Index	Hazard Index

¹ Compliance with MCLs is determined by running annual averages at the sampling point.

The final rule requires:

- Public water systems must monitor for these PFAS and have three years to complete initial monitoring (by 2027), followed by ongoing compliance monitoring. Water systems must also provide the public with information on the levels of these PFAS in their drinking water beginning in 2027.
- Public water systems have five years (by 2029) to implement solutions that reduce these PFAS if monitoring shows that drinking water levels exceed these MCLs.
- Beginning in five years (2029), public water systems that have PFAS in drinking water which violates one or more of these MCLs must take action to reduce levels of these PFAS in their drinking water and must provide notification to the public of the violation.

Attachment 2-12: Department of Drinking Water Rulemaking Status for Cadmium, Mercury, Styrene, and Arsenic

Note: Screenshots retrieved from the State Water Resources Control Board website. The full websites can be viewed at

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/cadmium-and-mercury-mcls.html (Cadmium and Mercury),

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/styrene-mcl.html (Styrene), and

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/arsenic-mcl-revision.html (Arsenic). Retrieved May 1, 2025.

Cadmium and Mercury MCLs

Rulemaking Status

This rulemaking is in development and has not yet begun.
Inquiries regarding the contents of this regulation may be directed to Melissa.Hall@waterboards.ca.gov.

Background

The current cadmium MCL (maximum contaminant level) is 5 µg/L (0.005 mg/L).
The current cadmium DLR (detection limit for purposes of reporting) is 1 µg/L (0.001 mg/L).
The current cadmium PHG (public health goal) is 0.04 µg/L (0.00004 mg/L).

The current mercury MCL (maximum contaminant level) is 2 µg/L (0.002 mg/L).
The current mercury DLR (detection limit for purposes of reporting) is 1 µg/L (0.001 mg/L).
The current mercury PHG (public health goal) is 1.2 µg/L (0.0012 mg/L).

Occurrence

The tables below summarize the Division of Drinking Water's water quality database's reported findings of cadmium and mercury from 1 January 2014 to 1 October 2024 for community water systems (CWS), non-community non-transient water systems (NTNCWS), and transient non-community water systems (TNCWS) using the highest running annual average for each source. In this case, sources are active wells, springs, infiltration galleries, common headers, and other intakes reporting monitoring results for cadmium and mercury. Data includes both raw and treated sources.

Cadmium Occurrence Data

Highest Running Annual Average Source Concentration (µg/L)	CWS		NTNCWS		TNCWS	
	No. of Sources	No. of Systems	No. of Sources	No. of Systems	No. of Sources	No. of Systems
≤ 1 (DLR)	7,001	1,814	1,160	831	187	165
> 1 and ≤ 2	45	37	9	8	1	1
> 2 and ≤ 3	14	14	5	5	-	-
> 3 and ≤ 4	9	9	4	4	1	1
> 4 and ≤ 5	3	3	2	2	-	-
≥ 5 (MCL)	5	3	2	2	1	1
Total Tested	7,077	1,831	1,191	843	190	167
Statewide Total	9,583	2,640	2,115	1,446	3,538	2,941
Percent Tested	73.8%	69.4%	56.3%	58.3%	5.4%	5.7%

Mercury Occurrence Data

Highest Running Annual Average Source Concentration (µg/L)	CWS		NTNCWS		TNCWS	
	No. of Sources	No. of Systems	No. of Sources	No. of Systems	No. of Sources	No. of Systems
≤ 1 (DLR)	8,547	2,544	1,919	1,389	339	295
> 1 and ≤ 1.2	10	9	4	4	1	1
> 1.2 and ≤ 1.4	8	8	-	-	-	-
> 1.4 and ≤ 1.6	2	2	-	-	-	-
> 1.6 and ≤ 1.8	1	1	-	-	1	1
> 1.8 and ≤ 2	3	3	1	1	-	-
> 2 (MCL)	12	11	7	6	-	-
Total Tested	8,583	2,552	1,931	1,395	341	297
Statewide Total	9,583	2,640	2,115	1,446	3,538	2,941
Percent Tested	89.6%	96.7%	91.3%	96.5%	9.6%	10.1%

The values above should not be considered to reflect cadmium or mercury in drinking water served to customers, since water from these sources may be blended, treated, or otherwise not used to provide drinking water. For more information about the quality of specific drinking water supplies, see public water systems' annual Consumer Confidence Reports. The sampling results in the table above were obtained from laboratories using one of the following CLAP accredited methods:

- Cadmium
 - SM 3113 B: Metals by Electrothermal Atomic Absorption Spectrometry (2010)
 - EPA 200.5: Determination of Trace Elements in Drinking Water by Axially Viewed Inductively Coupled Plasma - Atomic Emission Spectrometry (2003)
 - EPA 200.8: Determination of Trace Elements in Water and Wastes by Inductively Coupled Plasma - Mass Spectrometry (1994)
 - EPA 200.9: Determination of Trace Elements by Stabilized Temperature Graphite Furnace Atomic Absorption (1994)
- Mercury
 - SM 3112 B: Metals by Cold-Vapor Absorption Spectrometry (2009)
 - EPA 200.8: Determination of Trace Elements in Water and Wastes by Inductively Coupled Plasma - Mass Spectrometry (1994)
 - EPA 245.1: Determination of Mercury in Water by Cold Vapor Atomic Absorption Spectrometry (1994)
 - EPA 245.2: Mercury (Automated cold Vapor Technique) by Atomic Absorption (1974)

Rulemaking Proceedings

- Notice of Proposed Rulemaking Published: TBD
- Close of the 45-Day Public Comment Period: TBD
- Date of Scheduled Public Hearings: TBD
- Date filed with Office of Administrative Law: TBD
- Approved by Office of Administrative Law: TBD
- Filed with the Secretary of State: TBD
- Effective Date: TBD

Sections Affected

- California Code of Regulations, Title 22, sections TBD

Rulemaking File

- TBD

Styrene MCL

Rulemaking Status

This rulemaking is in development and has not yet begun.

Inquiries regarding the contents of this regulation may be directed to Melissa.Hall@waterboards.ca.gov.

Background

The current styrene MCL (maximum contaminant level) is 100 µg/L (0.1 mg/L).

The current styrene DLR (detection limit for purposes of reporting) is 0.5 µg/L (0.0005 mg/L).

The current styrene PHG (public health goal) is 0.5 µg/L (0.0005 mg/L).

Occurrence

The tables below summarize the Division of Drinking Water’s water quality database’s reported findings of styrene from 1 January 2014 to 1 October 2024 for community water systems (CWS), non-community non-transient water systems (NTNCWS), and transient non-community water systems (TNCWS) using the highest running annual average for each source. In this case, sources are active wells, springs, infiltration galleries, common headers, and other intakes reporting monitoring results for styrene. Data includes both raw and treated sources.

Styrene Occurrence Data

Highest Running Annual Average Source Concentration (µg/L)	CWS		NTNCWS		TNCWS	
	No. of Sources	No. of Systems	No. of Sources	No. of Systems	No. of Sources	No. of Systems
≤ 0.5 (DLR)	8,540	2,511	1,898	1,376	172	150
> 0.5 and ≤ 1	15	11	5	5	-	-
> 1 and ≤ 1.5	1	1	-	-	1	1
> 1.5 and ≤ 2	2	2	-	-	-	-
> 2 and ≤ 100	-	-	-	-	-	-
> 100 (MCL)	-	-	-	-	-	-
Total Tested	8,558	2,514	1,903	1,379	173	151
Statewide Total	9,583	2,640	2,115	1,446	3,538	2,941
Percent Tested	89.3%	95.2%	90.0%	95.4%	4.9%	5.1%

The values above should not be considered to reflect styrene in drinking water served to customers, since water from these sources may be blended, treated, or otherwise not used to provide drinking water. For more information about the quality of specific drinking water supplies, see public water systems’ annual Consumer Confidence Reports. The sampling results in the table above were obtained from laboratories using one of the following ELAP accredited methods:

- EPA Method 502.2: Volatile Organic Compounds in Water by Purge and Trap Capillary Column Gas Chromatography with Photoionization and Electrolytic Conductivity Detectors in Series (1989)
- EPA Method 524.2: Measurement of Purgeable Organic Compounds in Water by Capillary Column Gas Chromatography/Mass Spectrometry (1995)
- EPA Method 524.3: Measurement of Purgeable Organic Compounds in Water by Capillary Column Gas Chromatography/Mass Spectrometry (2009)
- EPA Method 524.4: Measurement of Purgeable Organic Compounds in Water by Gas Chromatography/Mass Spectrometry Using Nitrogen Purge Gas (2013)

Rulemaking Proceedings

- Notice of Proposed Rulemaking Published: TBD
- Close of the 45-Day Public Comment Period: TBD
- Date of Scheduled Public Hearings: TBD
- Date filed with Office of Administrative Law: TBD
- Approved by Office of Administrative Law: TBD
- Filed with the Secretary of State: TBD
- Effective Date: TBD

Sections Affected

- California Code of Regulations, Title 22, sections TBD

Rulemaking File

- TBD

Arsenic MCL Revision

Rulemaking Status

This rulemaking is in development and has not yet begun.

Inquiries regarding the contents of this regulation may be directed to DDWRegUnit@waterboards.ca.gov.

Background

More information about arsenic.

The current arsenic MCL (maximum contaminant level) is 10 µg/L (0.01 mg/L).

The current arsenic DLR (detection limit for purposes of reporting) is 2 µg/L (0.002 mg/L).

The current arsenic PHG (public health goal) is 0.004 µg/L (0.000004 mg/L).

Occurrence

The tables below summarize the Division of Drinking Water's water quality database's reported findings of arsenic from 1 January 2014 to 1 November 2024 for community water systems (CWS), non-community non-transient water systems (NTNCWS), and transient non-community water systems (TNCWS) using the highest running annual average for each source. In this case, sources are active wells, springs, infiltration galleries, common headers, and other intakes reporting monitoring results for arsenic. Data includes both raw and treated sources.

Highest Running Annual Average Source Concentration (µg/L)	CWS		NTNCWS		TNCWS	
	No. of Sources	No. of Systems	No. of Sources	No. of Systems	No. of Sources	No. of Systems
≤ 2 (DLR)	4,745	1,678	873	673	240	208
> 2 and ≤ 4	1,915	842	440	370	64	61
> 4 and ≤ 6	701	402	208	182	23	22
> 6 and ≤ 8	392	264	106	93	16	16
> 8 and ≤ 10	257	181	74	68	12	12
> 10 (MCL)	624	338	227	189	71	66
Total Tested	8,634	2,558	1,928	1,397	426	373
Statewide Total	9,583	2,640	2,115	1,446	3,538	2,941
Percent Tested	90.1%	96.9%	91.2%	96.6%	12.0%	12.7%

The values above should not be considered to reflect arsenic in drinking water served to customers, since water from these sources may be blended, treated, or otherwise not used to provide drinking water. For more information about the quality of specific drinking water supplies, see public water systems' annual Consumer Confidence Reports. The sampling results in the table above were obtained from laboratories using one of the following ELAP accredited methods:

- SM 3113 B: Metals by Electrothermal Atomic Absorption Spectrometry (2010)
- EPA Method 200.8: Determination of Trace Elements in Water and Wastes by Inductively Coupled Plasma – Mass Spectrometry (1994)
- EPA Method 200.9: Determination of Trace Elements by Stabilized Temperature Graphic Furnace Atomic Absorption (1994)

Rulemaking Proceedings

- Notice of Proposed Rulemaking Published: TBD
- Close of the 45-Day Public Comment Period: TBD
- Date of Scheduled Public Hearings: TBD
- Date filed with Office of Administrative Law: TBD
- Approved by Office of Administrative Law: TBD
- Filed with the Secretary of State: TBD
- Effective Date: TBD

Sections Affected

- California Code of Regulations, Title 22, sections 64431, 64432, 64447.2, 64465, 64481, and 64482.D

Rulemaking File

- TBD

Attachment 2-13: LA Division Water Resources Manager

August 2, 2021

WATER RESOURCES MANAGER Los Angeles County Division

JOB SUMMARY

Under the direction and supervision of the Vice President, responsible for issues relating to water rights, groundwater basin management, water quality, regulatory compliance, conservation, recycled water, and safety.

JOB DUTIES AND ESSENTIAL FUNCTIONS

Perform a variety of tasks and duties, which may include but would not be limited to, the following:

- Supervise and direct the work of the Water Quality Superintendent, and Conservation Coordinator.
- Oversee the company's compliance with safe drinking water, conservation, regulatory compliance, recycled water, and safety requirements.
- Oversee the company's water resources and arrange for the lease of supplemental water rights as warranted.
- Manage the timely acknowledgement and payment of supplemental water leases.
- Monitor regulations and water assessments as they relate to the company's operations under the sphere of the Main San Gabriel Basin Watermaster, Upper San Gabriel Municipal Water District, Metropolitan Water District of Southern California, San Gabriel Valley Water Association, Central Basin Municipal Water District, Water Replenishment District, Central Basin Water Association, San Gabriel Basin Water Quality Authority, San Gabriel Valley Protective Association, California Department of Water Resources Watermaster, San Gabriel River Watermaster, and the Drinking Water Program of State Water Resources Control Board.
- Monitor and verify monthly purchases of imported water from the Central Basin Municipal Water District for the company's Montebello System.
- Monitor and verify monthly pumping assessment by the Water Replenishment District on the company's Central Basin water production.
- Review correspondence and notices from regulatory agencies regarding water resources.
- Prepare and/or oversee the preparation of reports, filings, applications and other documentation as they relate to the company's water resources and water quality.
- Review and comment on proposed legislation as it relates to water quality, transfer, and/or storage.
- Oversee the company's overall conservation, recycled water and water quality programs.
- Other related tasks and duties as directed.

SKILLS, KNOWLEDGE, AND PHYSICAL REQUIREMENTS

Skills, knowledge, and physical requirements include, but are not limited to:

- Good knowledge of federal and state drinking water regulations, Main Basin Judgement, Central Basin Judgement, Chino Basin Judgement, and Long Beach Judgement, and familiarity with CEQA, NPDES, AQMD, OSHA, and other environmental and safety standards.
- Ability to prepare written technical reports, ability to give oral presentations regarding water quality, water resources, water transfer and/or storage, water conservation, and safety.
- Capable of working closely with the public and regulatory agencies.
- Good personal computer skills in Word, Excel, and PowerPoint.
- Ability to communicate effectively, both orally and in writing.
- Must be dependable, punctual, and have good attendance.
- Neat and professional appearance.
- Ability to interact with supervisors, co-workers and public in a cooperative and professional manner.
- Ability to perform repetitive physical activities, including keyboarding, sit, stand, walk, reach, grasp, push, pull, bend, stoop, climb, crouch, squat, crawl and twist, and lift up to 25 lbs.

EDUCATION, TRAINING AND EXPERIENCE

The following are required:

- High school diploma.
- College degree or equivalent work experience in water resources, water quality and safety.
- Grade 2 Water Treatment Operator and Water Distribution Operator certificates.
- Valid California driver's license and acceptable driving record required.

CONFIDENTIAL Attachment 2-14: Response to TGE-007

SAN GABRIEL VALLEY WATER COMPANY

March 14, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: Response to Data Request No. TGE-007 (Water Resources Positions)

Dear Mr. Aslam:

In response to your data request dated March 21, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

Please refer to SGVWC application Excel Workpaper "GRC Workpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4." Line 207 shows a "Water Resources Analyst" position filled by [REDACTED] in the LAC division. Line 216 shows a "Water Resources Analyst" position filled by [REDACTED] in the Fontana division. Please answer the following questions.

- a. Please provide in a tabulated Excel spreadsheet the monthly logged overtime hours for each of these two Water Resources Analyst positions for the years 2020 through 2024.
- b. Does SGVWC utilize any Water Resources Analyst personnel towards non-tariffed affiliate work and activities?
- c. If the answer to Question 1b is "yes", please identify the names of the non-tariffed affiliates that utilized the work services of SGVWC's two Water Resources Analysts. Please also provide in a tabulated Excel spreadsheet the monthly logged hours for non-tariffed affiliate work for each of these two Water Resources Analyst positions for the years 2020 through 2024. If SGVWC Water Resources

Analysts did work for more than one non-tariffed affiliate, please provide separate Excel workpapers or separate Excel worksheet tabs for each non-tariffed affiliate for each employee.

- d. Has SGVWC ever utilized or currently utilize outside services to conduct the specific duties and responsibilities of a Water Resources Analyst as described in SGVWC application file "EXHIBIT SG-8 (Zvirbulis).pdf" at pages 5 to 6?
- e. If the answer to Question 1d is "yes", please provide in a tabulated Excel spreadsheet the following information for the years 2020 through 2024. Please provide two separate Excel spreadsheets for each division in LAC and Fontana. Please add additional informational columns if necessary.

Contractor Name	Date of Services	Cost of Service	Reference Number	Account Number		

RESPONSE NO. 1:

- a. Refer to file titled \Attachment A - San Gabriel Valley Water Company Overtime Records.pdf\ There are minimal records of overtime logged for the Water Resource Analyst positions. If overtime is needed to complete a task, typically the remaining work would be completed by a salary employee, typically the Water Resources Manager or Director of Water Resources.
- b. No.
- c. Not applicable.
- d. Yes.
- e. Refer to file titled \Attachment B – Outside Services from 2020-2024.xlsx\.

RESPONDING WITNESSES: Zvirbulis/Fealy

REQUEST NO. 2:

Please refer to SGVWC application Excel Workpaper "GRCWorkpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4." Line 210 shows a "Water Quality Specialist" position filled by [REDACTED] in the LAC division. Line 213 shows a "Water Quality Specialist" position filled by [REDACTED] in the Fontana division. Please answer the following questions.

- a. Please provide in a tabulated Excel spreadsheet the monthly logged overtime hours for each of these two Water Quality Specialist positions for the years 2020 through 2024.
- b. Does SGVWC utilize any Water Quality Specialist personnel towards non-tariffed affiliate work and activities?
- c. If the answer to Question 1b is “yes”, please identify the names of the non-tariffed affiliates that utilized the work services of SGVWC’s two Water Quality Specialists. Please also provide in a tabulated Excel spreadsheet the monthly logged hours for non-tariffed affiliate work for each of these two Water Quality Specialist positions for the years 2020 through 2024. If SGVWC Water Quality Specialists did work for more than one non-tariffed affiliate, please provide separate Excel workpapers or separate Excel worksheet tabs for each non-tariffed affiliate for each employee.
- d. Has SGVWC ever utilized or currently utilize outside services to conduct the specific duties and responsibilities of a Water Quality Specialist as described in SGVWC application file “EXHIBIT SG-8 (Zvirbulis).pdf” at page 6?
- e. If the answer to Question 2d is “yes”, please provide in a tabulated Excel spreadsheet the following information for the years 2020 through 2024. Please provide two separate Excel spreadsheets for each division in LAC and Fontana. Please add additional informational columns if necessary.

Contractor Name	Date of Services	Cost of Service	Reference Number	Account Number		

RESPONSE NO. 2:

- a. Refer to file titled \Attachment A - San Gabriel Valley Water Company Overtime Records.pdf\.
- b. No.
- c. Not applicable.
- d. Yes.
- e. Refer to file titled \Attachment B – Outside Services from 2020-2024.xlsx \.

RESPONDING WITNESSES: Zvirbulis/ Fealy

REQUEST NO. 3:

Please refer to SGVWC application file “EXHIBIT SG-8 (Zvirbulis).pdf” at pages 5 to 6.

In these pages, SGVWC justifies its request for new Water Resources Analyst and Water Quality Specialist positions by citing impending conservation and water quality regulations. Please answer the following questions.

- a. In the last ten years from 2015 through 2024, has SGVWC encountered and complied with any new conservation and water quality regulations that have gone into effect during this period?
- b. If the answer to Questions 3a is “yes,” please list all the specific regulations that went into effect during the years 2015 through 2024.
- c. Please describe in detail how SGVWC staff handled compliance with each new regulation that went into effect during the years 2015 through 2024. Please also identify any new positions that SGVWC created due to such new regulations with adequate supporting documents such as hirings dates and job descriptions and other similar support.

RESPONSE NO. 3:

- a. Yes
- b. Refer to file titled \Attachment C – Regulations from 2015-2024.pdf\.
- c. For details describing how SGVWC staff handled compliance with each new regulation, refer to file titled \Attachment C – Regulations from 2015-2024.pdf\. The following Water Resources Department Positions were approved from 2015-2024:

Position Title	Date Hired or Transferred	Support Documents
Water Quality Superintendent – FWC Division	6/11/2017	See D.17-06-008 and Exhibit SG-5 (DiPrimio) from 2016

RESPONDING WITNESSES: Zvirbulis/Fealy

REQUEST NO. 4:

Please refer to SGVWC application file “EXHIBIT SG-8 (Zvirbulis).pdf” at pages 5 to 6.

In these passages, SGVWC justifies its request for new Water Resources Analyst and Water Quality Specialist positions by citing additional workload needed to comply with new conservation and water quality regulations. Please answer the following questions.

- a. Has SGVWC conducted a work study that examines the additional incremental workload resulting from compliance with these new regulations? If the answer is “yes,” please provide all supporting documentation that supports this work study.

RESPONSE NO. 4:

- a. SGVWC conducted its own internal evaluation of the additional workloads, department needs and costs of the proposed positions to support application file “EXHIBIT SG-8 (Zvirbulis). Refer to \Attachment D – 2024.2025 GRC Positions Evaluation.pdf\.

RESPONDING WITNESSES: Zvirbulis/Fealy

REQUEST NO. 5:

Please refer to the specific duties and responsibilities for a Water Resources Analyst as described in SGVWC application file “EXHIBIT SG-8 (Zvirbulis).pdf” at pages 5 to 6.

- a. Please provide one year’s data from 2024 for all tasks, duties, and responsibilities performed by SGVWC’s Water Resources Analysts.

RESPONSE NO. 5:

- a. Refer to \Attachment D – 2024.2025 GRC Positions Evaluation.pdf\, specifically the job duties and essential functions of the Water Resources Analyst job description. These duties constitute a full-time position for each division in 2024.

SGVWC maintains focus on overall job performance and outcomes rather than mandating the documentation of specific daily, weekly and monthly tasks; therefore, this specific data is not compiled in the requested format.

RESPONDING WITNESSES: Zvirbulis/Fealy

REQUEST NO. 6:

Please refer to the specific duties and responsibilities for a Water Quality Specialist as described in SGVWC application file “EXHIBIT SG-8 (Zvirbulis).pdf” at page 6.

- a. Please provide one year’s data from 2024 for all tasks, duties, and responsibilities performed by SGVWC’s Water Quality Specialists.

RESPONSE NO. 6:

- a. Refer to \Attachment D – 2024.2025 GRC Positions Evaluation.pdf\, specifically the job duties and essential functions of the Water Quality Specialist job description. These duties constitute a full-time position for each division in 2024.

SGVWC maintains focus on overall job performance and outcomes rather than mandating the documentation of specific daily, weekly and monthly tasks; therefore, this specific data is not compiled in the requested format.

RESPONDING WITNESSES: Zvirbulis/Fealy

REQUEST NO. 7:

Please refer to SGVWC application file "EXHIBIT SG-8 (Zvirbulis).pdf" at page 5. In its justification for an additional Water Resources Analyst, SGVWC writes, "As a result of the recent retirement of the Company's Water Resources Manager in the LAC division, additional analyst support is necessary to support Main and Central Basin groundwater administration..." However, in SGVWC application Excel Workpaper "GRC Workpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4," Line 201 shows a "Water Resources Manager" position as being filled and projected for the years covered in this current GRC. Please answer the following questions.

- a. Is the Water Resources Manager position as described in "EXHIBIT SG-8 (Zvirbulis).pdf" at page 5 different and separate from the Water Resources Manager position as shown in Excel Workpaper "GRC Workpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4," at Line 201? If the answer is "yes," please explain in detail how the positions are different and separate from each other.
- b. If the two Water Resources Manager positions are in fact separate positions, does SGVWC plan to fill the Water Resources Manager position that became vacant due to retirement? If the answer is "no," please explain in detail why. If the answer is "yes," please explain in detail why the vacant Water Resources Manager position does not appear in Excel Workpaper "GRC Workpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4."
- c. Please provide the employee's name, the hiring date, the starting date for the specific Water Resources Manager position, and the end-of-employment date of the Water Resources Manager that had presumably retired.
- d. Please describe in detail the Water Resources Manager position's specific job duties, tasks and responsibilities.

RESPONSE NO. 7:

- a. Yes. The Water Resources Manager shown on Line 201 of "GRC Workpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4," is specific to the FWC Division. The retired Water Resources Manager referenced on Page 5 described in "EXHIBIT SG-8 (Zvirbulis).pdf" was specific to the Los Angeles County Division.

- b. Yes, as stated in "EXHIBIT SG-8 (Zvirbulis).pdf" on Page 5, SGVWC plans to hire an additional Analyst at this time. The FWC Division Water Resources Manager was promoted to Water Resources Director prior to the LAC Division Water Resources Manager retiring. Only the Water Resources Manager for the FWC Division was backfilled.

The cost savings from the vacant LAC Division Water Resources Manager position, along with the savings of replacing the other Water Resources Manager, by promoting within the Company, nearly cover the cost increase of all (3) NEW POSITIONS shown on Lines 202, 208 and 214 of "GRC Workpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4." Refer to \Attachment D – 2024.2025 GRC Positions Evaluation.pdf, specifically the Page titled "Water Resources – New Position Salary Study."

- c. Dan Arrighi. Start Date: 1/15/1981, Retired: 8/30/2024
- d. Refer to \Attachment E – LAC Division Water Resources Manager.pdf.

RESPONDING WITNESSES: Zvirbulis/Fealy

REQUEST NO. 8:

Please refer to SGVWC application file "EXHIBIT SG-8 (Zvirbulis).pdf" at page 4. SGVWC states "In January of 2023, San Gabriel re-organized and re-aligned the oversight of the Company's water resources department. As a result, all water resources functions for both the Company's LAC and FWC divisions were consolidated."

- a. Please explain in detail why SGVWC re-organized and consolidated its LAC and FWC divisions in the Water Resources Department? Were there any cost savings for the ratepayers? If yes, indicate where in SGVWC's workpapers did SGVWC incorporate these savings.
- b. Does the Water Resources Manager position as referred to in Question 7 perform duties for both LAC and FWC divisions because of this consolidation? Please explain in detail.
- c. Do SGVWC Water Resources Analysts and Water Quality Specialists perform duties in both the LAC and FWC divisions because of this consolidation, regardless of their division assignment? Please explain in detail.

RESPONSE NO. 8:

- a. Refer to Response No. 7b.

- b. Refer to Response No. 7a. The Water Resources Director is in the only position with duties in both the LAC and FWC Divisions.
- c. Yes, this is an unfortunate consequence of trying to manage unbalanced workloads resulting from both managing our grant portfolio and the new regulatory reporting requirements.

RESPONDING WITNESSES: Zvurbulis/Fealy

Please call me at (626) 448-6183 with any questions regarding this information.

Sincerely,

/s/ Joel M Reiker

Joel M. Reiker
Vice President, Regulatory Affairs

Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)

/encl.

CONFIDENTIAL Attachment 2-15: Response to TGE-012

SAN GABRIEL VALLEY WATER COMPANY

April 9, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: Response to Data Request No. TGE-012 (Water Resources Positions 2)

Dear Mr. Aslam:

In response to your data request dated April 2, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

Please refer to SGVWC application Excel Workpaper "GRCWorkpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4." Line 207 shows a "Water Resources Analyst" position filled by [REDACTED] in the LAC division. Line 216 shows a "Water Resources Analyst" position filled by [REDACTED] in the Fontana division. Please also refer to SGVWC's previous General Rate Case (GRC) Application 22-01-003 (A.22-01-003), Excel Workpaper "GRCWorkpapers – San Gabriel," worksheet tab "PR4." Line 95 shows a Conservation Specialist" position filled by [REDACTED] in the Administration department of the LAC division. Line 99 shows a "Operations Analyst" position filled by [REDACTED] in the Engineering department of the General division. Line 99 also marks the Operations Analyst position as a "New Position" for A.22-01-003. Please answer the following questions.

- a. Please describe in detail the official job duties and responsibilities of the Conservation Specialist position.
- b. Please provide the relevant CPUC Application and Decision numbers that approved the creation of the Conservation Specialist position.
- c. Please describe in detail the official job duties and responsibilities of the Operations Analyst position.
- d. Please explain in detail why the Conservation Specialist position does not appear in the current GRC workpaper "GRCWorkpapers – 2025 (FORMAL

11142 GARVEY AVENUE • P.O. BOX 6010 • EL MONTE, CALIFORNIA 91734-2010 • (626) 448-6183 • Fax (626) 448-5530

- APPLICATION)."
- e. Please explain in detail why the Operations Analyst position does not appear in the current GRC workpaper "GRC Workpapers – 2025 (FORMAL APPLICATION)."
 - f. Excel Workpaper "GRC Workpapers – San Gabriel," worksheet tab "PR4," Line 99 from GRC A.22-01-003 marks the Operations Analyst as a "New Position." Did SGVWC receive approval to create and implement the Operations Analyst position? If the answer is "yes," please provide the relevant CPUC Decision numbers that approved the Operations Analyst position.
 - g. Please provide the application testimony file or files that discusses and justifies what was then "new" Operations Analyst position from GRC A.22-01-003. Please also provide the page numbers and line numbers marking the passages discussing and justifying the new Operations Analyst position from these application testimony files.
 - h. Is the Conservation Specialist position previously filled by [REDACTED] and the current Water Resources Analyst position currently filled by [REDACTED] the same position? If the answer is "yes," please explain in detail why SGVWC renamed the position and moved the position into the Water Resources department from the Administration department. Please also explain any differences, if any, between the job duties and responsibilities of the Conservation Specialist and the Water Resources Analyst positions. If the answer is "no," please explain in detail why SGVWC moved [REDACTED] into this Water Resources Analyst position. Please also provide the relevant CPUC Application and Decision numbers that approved the creation of this particular Water Resources Analyst position.
 - i. Is the Operations Analyst position previously filled by [REDACTED] and the current Water Resources Analyst position currently filled by [REDACTED] the same position? If the answer is "yes," please explain in detail why SGVWC renamed the position and moved the position into the Water Resources department in the Fontana division, from the General division's Engineering department. Please also explain any differences, if any, between the job duties and responsibilities of the Operations Analyst and the Water Resources Analyst positions. If the answer is "no," please explain in detail why SGVWC moved "Sims, Megan N." into this Water Resources Analyst position. Please also provide the relevant CPUC Application and Decision numbers that approved the creation of this particular Water Resources Analyst position.

RESPONSE NO. 1:

- a. Refer to /TGE-012 ATTACHMENT A – Customer Serviceman/Conservation Specialist – LA.pdf/.
- b. A.07-07-003, D.08-06-022
- c. Refer to /TGE-012 ATTACHMENT B – Operations Analyst.pdf/.

- d. The Customer Serviceman/Conservation Specialist position was repurposed and listed in the current GRC workpapers as a Water Resources Analyst for the Los Angeles Division.
- e. The Operations Analyst position was repurposed and listed in the current GRC workpapers as a Water Resources Analyst for the Fontana Division.
- f. Yes, D.24-03-005.
- g. Refer to /TGE-012 ATTACHMENT C.pdf/. The Operations Analyst Position was discussed in GRC A.22-01, Exhibit SG-9 (Zvirbulis), Section VIII. Need for Additional Full-Time Employees starting on Page 33.
- h. Yes, refer to Response 1a, 1b and 1d. Additionally, TGE-007 Response, specifically /Attachment D – 2024.2025 GRC Positions Evaluation.pdf/ includes the job description of the Water Resources Analyst for comparison. The Company took the opportunity to leverage [REDACTED] talents by means of promotion and repurposed his position to Water Resources Analyst to better utilize his skillsets. Lastly, there was a benefit of transferring knowledge from the upcoming retirement of the Los Angeles division's Water Resources Manager to [REDACTED] managing the growing workload in the Water Resources Department.
- i. Yes, refer to Response 1c, 1e and 1f. Additionally, TGE-007 Response, specifically /Attachment D – 2024.2025 GRC Positions Evaluation.pdf/ includes the job description of the Water Resources Analyst for comparison. Additionally, the Company saw multiple benefits of having a Water Resources Analyst in its Los Angeles division and wanted to mirror the position in its Fontana division. [REDACTED] was a very talented employee with a diverse skillset. The Company took the opportunity to leverage her talents by means of promotion and repurposed the Operations Analyst Position to a Water Resources Analyst to better utilize her skillsets. She also transferred over some of her previous duties from Operations to avoid leaving a gap in responsibilities.

RESPONDING WITNESSES: Zvirbulis/Fealy

REQUEST NO. 2:

Please refer to SGVWC application Excel Workpaper "GRC Workpapers – 2025 (FORMAL APPLICATION)," worksheet tab "PR4." Line 210 shows a "Water Quality Specialist" position filled by [REDACTED] in the LAC division. Line 213 shows a "Water Quality Specialist" position filled by [REDACTED] in the Fontana division. Please answer the following questions.

- a. Did SGVWC ever classify these two Water Quality Specialist positions under different position names, company departments, or company divisions? If the answer is "yes," please provide all previous position names, company departments, and company divisions

for each of the two Water Quality Specialist positions. Please also provide the exact dates for each time SGVWC changed the position names, company departments, and company divisions for each of these two Water Quality Specialist positions.

- b. Please provide the relevant CPUC Application and Decision numbers in which SGVWC received approval to create the Water Quality Specialist position currently held by [REDACTED]
- c. Please provide the relevant CPUC Application and Decision numbers in which SGVWC received approval to create the Water Quality Specialist position currently held by [REDACTED]

RESPONSE NO. 2:

- a. No.
- b. A.04-09-005, D.05-07-044
- c. A.02-11-044, D.04-07-034, Advice Letter 332

RESPONDING WITNESSES: Zvirbulis/Fealy

REQUEST NO. 3:

Please refer to file "Attachment C – Regulations from 2015-2024.pdf," which SGVWC provided in response to Data Request (DR) TGE-007 Water Resources Positions.

- a. On page 3, SGVWC discusses 2017 Water Quality regulations, which include Department of Drinking Water issuing Permit Amendment NO. 2017PA-Schools, and Assembly Bill AB 746. SGVWC writes:

Challenges arose during this process due to the limited water quality staff, resulting in additional overtime or make-up time and the need for support from other departments. According to the EPA's 3Ts for Reducing Lead in Drinking Water, lead sample collection requires first draw samples, meaning water must remain stagnant in the pipes for at least eight hours before testing. To meet this requirement, additional overtime or make-up time was necessary to ensure staff could begin work before school staff and students arrived.

SGVWC writes about similar challenges for sampling lead samples in accordance with Assembly Bill AB746. Please answer the following.

- i. Did SGVWC utilize any outside services to meet the lead sampling requirements in Permit Amendment NO. 2017PA-Schools and/or Assembly Bill AB 746? If the answer is "yes", please provide in a tabulated Excel spreadsheet the following information as shown below for outside services utilized to meet these lead sampling requirements for the years 2017 through 2024. Please provide two separate Excel spreadsheets for each division in LAC and Fontana. Please add additional informational columns if necessary. If the answer is "no," please explain in detail SGVWC's reasoning to not utilize outside services for lead sampling.

Contractor Name	Date of Services	Cost of Service	Reference Number	Account Number

- ii. Please provide the specific SGVWC positions and employee names that contributed work towards meeting the lead sampling requirements of Permit Amendment NO. 2017PA-Schools, and Assembly Bill AB 746. Please also include the positions and employee names of staff from other departments that also supported meeting these requirements.
- iii. Please provide in a tabulated Excel spreadsheet the total monthly logged overtime hours and the total monthly logged make-up hours for the positions and employee names described in Question 3a.ii above. Please also provide in separate columns the number of overtime hours and makeup hours utilized towards specifically meeting these lead sampling requirements. The format and information for this spreadsheet should be the same as the format and information provided in file "Attachment A - San Gabriel Valley Water Company Overtime Records," provided by SGVWC in response to DR TGE-007 Water Resources Positions, as well as include the additional information for overtime hours and make-up hours utilized towards specifically meeting the lead sampling requirements. Please add additional information columns if necessary.

RESPONSE NO. 3a:

- i. No. San Gabriel used its own staff that was already trained, familiar with its water systems, and that were certified Water Treatment Operators. This provided confidence from both the Company and the School District representatives that the effort was executed correctly and efficiently. Because some of the employees utilized for this effort were salary positions the hours were not logged as overtime hours.
- ii. Refer to /TGE-012 ATTACHMENT D – Staff Hours.xlsx/.
- iii. Refer to /TGE-012 ATTACHMENT D – Staff Hours.xlsx/.

RESPONDING WITNESSES: Zvirbulis/Fealy

Sincerely,

/s/ Joel M Reiker

Joel M. Reiker
Vice President, Regulatory Affairs

Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)

Mehboob Aslam
Response to TGE-012

-6-

April 9, 2025

/encl.

Attachment 3-1: SGVWC CPUC Annual Reports for 2023 and 2024, Telephone Performance Standards.

Appendix A

SAN GABRIEL VALLEY WATER COMPANY GO 103-A CUSTOMER SERVICE PERFORMANCE STANDARDS REPORT 2023

	Performance Measure	Q1	Q2	Q3	Q4	Year to Date	Comments
1.	TELEPHONE PERFORMANCE STANDARDS						
	(A) % Calls Answered in 30 seconds	> or = 80.0%	94.0%	94.2%	91.8%	88.4%	91.9%
	(B) Abandonment Rate	< or = 5.0%	5.6%	5.4%	7.8%	11.0%	7.6%
2.	BILLING PERFORMANCE STANDARDS						
	(A) % Bills Rendered in 7 days	> or = 99.0%	100.0%	100.0%	100.0%	100.0%	
	(B) % of Inaccurate Bills Rendered	< or = 3.0%	0.1%	0.1%	0.1%	0.1%	0.1%
	(C) % of Payment Posting Errors	< or = 1.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	(D) % Final Bill and Final Read						No performance measure. In compliance
3.	METER READING PERFORMANCE STANDARD						
	(A) % Meters Not Read	< or = 3.0%	0.2%	0.1%	0.2%	0.1%	0.2%
4.	WORK COMPLETION PERFORMANCE STANDARDS						
	(A) % of Scheduled Appointments Missed	< or = 5.0%	0.1%	0.1%	0.1%	0.1%	0.1%
	(B) % Customer Requested Scheduled Orders Missed	< or = 5.0%	0.7%	0.5%	1.4%	3.8%	1.6%
5.	RESPONSE TO CUSTOMER AND REGULATORY						
	(A) % of Complaints to Utility from Consumer Affairs Branch	< or = 0.10%	0.00%	0.00%	0.00%	0.00%	0.00%
6.	SERVICE INTERRUPTION						
	(1) Date and time of service interruption (2) Date and time service is restored (3) Number of service connections affected (4) Equipment that operated and failed (5) Cause of interruption (6) Actions required to restore service (7) Identification of person reporting (8) Steps taken to prevent recurrence						The reporting standard requires each utility to keep a complete record of all interruptions, both emergency and scheduled. Records are kept in San Gabriels permanent records and available upon request.

2023

Appendix A

SAN GABRIEL VALLEY WATER COMPANY GO 103-A CUSTOMER SERVICE PERFORMANCE STANDARDS REPORT 2024

	Performance	Q1	Q2	Q3	Q4	Year to Date	Comments
1. TELEPHONE PERFORMANCE STANDARDS	Measure						
(A) % Calls Answered in 30 seconds	> or = 80.0%	88.9%	93.7%	93.6%	92.7%	92.0%	
(B) Abandonment Rate	< or = 5.0%	11.1%	6.3%	6.4%	7.3%	8.0%	
2. BILLING PERFORMANCE STANDARDS							
(A) % Bills Rendered In 7 days	> or = 99.0%	100.0%	100.0%	100.0%	100.0%	100.0%	
(B) % of Inaccurate Bills Rendered	< or = 3.0%	0.1%	0.1%	0.1%	0.1%	0.1%	
(C) % of Payment Posting Errors	< or = 1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
(D) % Final Bill and Final Read							No performance measure. In compliance
3. METER READING PERFORMANCE STANDARD							
(A) % Meters Not Read	< or = 3.0%	0.2%	0.1%	0.1%	0.1%	0.1%	
4. WORK COMPLETION PERFORMANCE STANDARDS							
(A) % of Scheduled Appointments Missed	< or = 5.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
(B) % Customer Requested Scheduled Orders Missed	< or = 5.0%	4.2%	0.9%	1.0%	0.9%	1.2%	
5. RESPONSE TO CUSTOMER AND REGULATORY							
(A) % of Complaints to Utility from Consumer Affairs Branch	< or = 0.10%	0.00%	0.00%	0.00%	0.00%	0.01%	
6. SERVICE INTERRUPTION							
(1) Date and time of service interruption (2) Date and time service is restored (3) Number of service connections affected (4) Equipment that operated and failed (5) Cause of interruption (6) Actions required to restore service (7) Identification of person reporting (8) Steps taken to prevent recurrence							The reporting standard requires each utility to keep a complete record of all interruptions, both emergency and scheduled. Records are kept in San Gabriels permanent records and available upon request.

2024

Attachment 3-2: TGE-001 Response Attachment 1 LA and Fontana Telephone Standards

SAN GABRIEL VALLEY WATER COMPANY (LOS ANGELES COUNTY DIVISION) CUSTOMER SERVICE PERFORMANCE STANDARDS REPORT YEAR 2023

	Goal	Q1	Q2	Q3	Q4	Year to Date	Comments
PHONE SYSTEM: Question 1							
Total Calls Received		13,886	12,802	17,322	15,027	59,037	
# Calls Answered in 30 seconds		13,697	12,650	17,074	14,734	58,155	
% Calls Answered in 30 seconds	> or = 80.0%	98.6%	98.8%	98.6%	98.1%	98.5%	
# Calls Abandoned		17	13	63	39	132	
Abandonment Rate	< or = 5.0%	0.1%	0.1%	0.4%	0.3%	0.2%	
BILLING: Question 2							
Total Bills Scheduled to Run		149,104	151,449	152,284	152,487	605,324	
Total Bills Rendered		149,104	151,449	152,284	152,487	605,324	
Bills Not Rendered in 7 days (10 for finals)		0	0	0	0	0	
% Bills Rendered In 7 days	> or = 99.0%	100.0%	100.0%	100.0%	100.0%	100.0%	
Inaccurate Bills Rendered		173	172	246	112	703	
% of Inaccurate Bills Rendered	< or = 3.0%	0.1%	0.1%	0.2%	0.1%	0.1%	
PAYMENTS: Question 2 Cont'd.							
Total Payments Posted		141,197	142,004	141,505	142,750	567,456	
Payment Posting Errors		13	0	2	2		
% of Payment Posting Errors	< or = 1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
METER READING: Question 3							
Total Number of Meter Reads Scheduled		152,914	156,662	156,956	157,044	623,576	
Total Scheduled Reads Not Read		307	198	177	158	840	
% Meters Not Read	< or = 3.0%	0.2%	0.1%	0.1%	0.1%	0.1%	
WORK ORDER COMPLETION: Question 4							
Total Work Orders Scheduled		1,841	2,179	2,169	1,865	8,054	
# Scheduled Orders Missed		5	6	5	3	19	
% of Scheduled Appointments Missed	< or = 5.0%	0.3%	0.3%	0.2%	0.2%	0.2%	
Total Customer Requested Work Orders		110	119	125	76	430	
# Customer Requested Scheduled Orders Missed		1	1	2	0	4	
% Customer Requested Scheduled Orders Missed	< or = 5.0%	0.9%	0.8%	1.6%	0.0%	0.9%	
CAB COMPLAINTS: Question 5							
Total # of Connections/Customers		51,014	51,113	51,192	51,207	51,131	
# of Complaints to Utility from CAB		0	0	1	0	1	
% of Complaints to Utility from CAB	< or = 0.10%	0.0%	0.0%	0.0%	0.0%	0.0%	

Los Angeles Division

SAN GABRIEL VALLEY WATER COMPANY (LOS ANGELES COUNTY DIVISION)
CUSTOMER SERVICE PERFORMANCE STANDARDS REPORT
YEAR 2024*

	Goal	Q1	Q2	Q3	Q4	Year to Date	Comments
PHONE SYSTEM: Question 1							
Total Calls Received		17,135	15,559	13,291	16,484	62,469	
# Calls Answered in 30 seconds		16,720	15,088	12,878	15,983	60,669	
% Calls Answered in 30 seconds	> or = 80.0%	97.6%	97.0%	96.9%	97.0%	97.1%	
# Calls Abandoned		415	471	413	501	1,800	
1(B) Abandonment Rate	< or = 5.0%	2.4%	3.0%	3.1%	3.0%	2.9%	
BILLING: Question 2							
Total Bills Scheduled to Run		151,580	154,415	154,650	161,312	621,957	
Total Bills Rendered		151,580	154,415	154,650	161,312	621,957	
Bills Not Rendered in 7 days (10 for finals)		0	0	0	0	0	
% Bills Rendered in 7 days	> or = 99.0%	100.0%	100.0%	100.0%	100.0%	100.0%	
Inaccurate Bills Rendered							
% of Inaccurate Bills Rendered	< or = 3.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
PAYMENTS: Question 2 Cont'd.							
Total Payments Posted		52,892	142,653	145,176	146,007	486,728	
Payment Posting Errors		4	52	34	12	102	
% of Payment Posting Errors	< or = 1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
METER READING: Question 3							
Total Number of Meter Reads Scheduled		139,790	140,456	137,077	142,623	559,946	
Total Scheduled Reads Not Read		126	11	39	50	226	
% Meters Not Read	< or = 3.0%	0.1%	0.0%	0.0%	0.0%	0.0%	
WORK ORDER COMPLETION: Question 4							
Total Work Orders Scheduled		3,307	6,203	5,994	5,739	21,243	
# Scheduled Orders Missed		3	4	3	2	12	
% of Scheduled Appointments Missed	< or = 5.0%	0.1%	0.1%	0.1%	0.0%	0.1%	
Total Customer Requested Work Orders		80	133	303	334	850	
# Customer Requested Scheduled Orders Missed		3	1	2	4	10	
% Customer Requested Scheduled Orders Missed	< or = 5.0%	3.8%	0.8%	0.7%	1.2%	1.2%	
CAB COMPLAINTS: Question 5							
Total # of Connections/Customers		51,243	51,297	51,345	51,361	51,312	
# of Complaints to Utility from CAB		1	1	2	2	6	
% of Complaints to Utility from CAB	< or = 0.10%	0.0%	0.0%	0.0%	0.0%	0.0%	

Los Angeles Division

SAN GABRIEL VALLEY WATER COMPANY (FONTANA DIVISION)
CUSTOMER SERVICE PERFORMANCE STANDARDS REPORT
YEAR 2023

	Goal	Q1	Q2	Q3	Q4	Year to Date	Comments
PHONE SYSTEM: Question 1							
Total Calls Received		24,277	22,415	32,492	28,599	107,783	
# Calls Answered in 30 seconds		22,167	20,523	28,661	23,852	95,203	
% Calls Answered in 30 seconds	> or = 80.0%	91.3%	91.6%	88.2%	83.4%	88.3%	
# Calls Abandoned		2,110	1,892	3,831	4,747	12,580	
Abandonment Rate	< or = 5.0%	8.7%	8.4%	11.8%	16.6%	11.7%	
BILLING: Question 2							
Total Bills Scheduled to Run		145,490	145,244	144,521	145,025	580,280	
Total Bills Rendered		145,490	145,244	144,521	145,025	580,280	
Bills Not Rendered in 7 days (10 for finals)		0	0	0	0	0	
% Bills Rendered in 7 days	> or = 99.0%	100.0%	100.0%	100.0%	100.0%	100.0%	
Inaccurate Bills Rendered		166	71	67	77	381	
% of Inaccurate Bills Rendered	< or = 3.0%	0.1%	0.0%	0.0%	0.1%	0.1%	
PAYMENTS: Question 2 Cont'd.							
Total Payments Posted		138,141	132,008	133,397	132,356	535,902	
Payment Posting Errors		1	4	3	1	9	
% of Payment Posting Errors	< or = 1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
METER READING: Question 3							
Total Number of Meter Reads Scheduled		149,357	149,479	149,478	149,639	597,953	
Total Scheduled Reads Not Read		251	238	311	237	1,037	
% Meters Not Read	< or = 3.0%	0.2%	0.2%	0.2%	0.2%	0.2%	
WORK ORDER COMPLETION: Question 4							
Total Work Orders Scheduled		4,412	3,625	3,847	3,919	15,803	
# Scheduled Orders Missed		0	1	2	1	4	
% of Scheduled Appointments Missed	< or = 5.0%	0.0%	0.0%	0.1%	0.0%	0.0%	
Total Customer Requested Work Orders		185	311	290	290	1,076	
# Customer Requested Scheduled Orders Missed		1	1	4	14	20	
% Customer Requested Scheduled Orders Missed	< or = 5.0%	0.5%	0.3%	1.4%	4.8%	1.9%	
CAB COMPLAINTS: Question 5							
Total # of Connections/Customers		48,504	48,538	48,573	48,602	48,554	
# of Complaints to Utility from CAB		1	0	1	0	2	
% of Complaints to Utility from CAB	< or = 0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	

Fontana Division

SAN GABRIEL VALLEY WATER COMPANY (FONTANA DIVISION)
CUSTOMER SERVICE PERFORMANCE STANDARDS REPORT
YEAR 2024*

	Goal	Q1	Q2	Q3	Q4	Year to Date	Comments
PHONE SYSTEM: Question 1							
Total Calls Received		32,483	25,321	26,183	25,098	109,065	
# Calls Answered in 30 seconds		27,367	23,198	24,074	22,572	97,211	
% Calls Answered in 30 seconds	> or = 80.0%	84.3%	91.6%	91.9%	89.9%	89.1%	
# Calls Abandoned		5,096	2,123	2,109	2,526	11,854	
Abandonment Rate	< or = 5.0%	15.7%	8.4%	8.1%	10.1%	10.9%	
BILLING: Question 2							
Total Bills Scheduled to Run		143,962	146,214	146,421	146,228	582,825	
Total Bills Rendered		143,962	146,214	146,421	146,228	582,825	
Bills Not Rendered in 7 days (10 for finals)		0	0	0	0	0	
% Bills Rendered In 7 days	> or = 99.0%	100.0%	100.0%	100.0%	100.0%	100.0%	
Inaccurate Bills Rendered							
% of Inaccurate Bills Rendered	< or = 3.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
PAYMENTS: Question 2 Cont'd.							
Total Payments Posted		51,259	133,257	138,716	137,817	461,089	
Payment Posting Errors		3	49	28	22	102	
% of Payment Posting Errors	< or = 1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
METER READING: Question 3							
Total Number of Meter Reads Scheduled		135,965	136,216	131,515	135,158	538,854	
Total Scheduled Reads Not Read		506	128	160	182	976	
% Meters Not Read	< or = 3.0%	0.4%	0.1%	0.1%	0.1%	0.2%	
WORK ORDER COMPLETION: Question 4							
Total Work Orders Scheduled		4,239	6,902	7,471	7,099	25,711	
# Scheduled Orders Missed		0	0	0	0	0	
% of Scheduled Appointments Missed	< or = 5.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Total Customer Requested Work Orders		62	219	416	337	1,034	
# Customer Requested Scheduled Orders Missed		3	2	5	2	12	
% Customer Requested Scheduled Orders Missed	< or = 5.0%	4.8%	0.9%	1.2%	0.6%	1.2%	
CAB COMPLAINTS: Question 5							
Total # of Connections/Customers		48,620	48,720	48,745	48,730	48,704	
# of Complaints to Utility from CAB		0	0	0	1	1	
% of Complaints to Utility from CAB	< or = 0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	

Fontana Division

Attachment 3-3: Response to TGE-003

SAN GABRIEL VALLEY WATER COMPANY

February 6, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: **Response to Data Request No. TGE-003 (Customer Service Metrics 2)**

Dear Mr. Aslam:

In response to your data request dated January 30, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

The following questions refer to SGVWC's most recent response to A2501001 Cal Advocates DR TGE-001 (Customer Service Metrics) as found in pdf file "TGE-001 (Response)" and Excel worksheet "TGE-001 Attachment 1." Please answer the following questions.

- a. In Excel worksheet "TGE-001 Attachment 1," worksheet tab "Fontana 2022," cell G11, shows a year-to-date Abandonment Rate of 2.1%. However, worksheet tab "Fontana 2023," cell G11, shows a year-to-date Abandonment Rate of 11.7%, an increase of 9.6%. This figure is out of compliance with General Order 103-A, Appendix E, which stipulates an Abandonment Rate of below or equal to 5.0% target rate. Worksheet tab "Fontana 2024," cell G11, also shows an uncompliant year-to-date Abandonment Rate of 10.9%. Please answer the following.
 - i. Please explain in detail the reason for why SGVWC's Abandonment Rate in the Fontana service area for the years 2023 and 2024 does not meet the 5.0% or below Abandonment Rate requirement pursuant to the General Order 103-A, Appendix E.
 - ii. Please also explain in detail SGVWC's plan, if any, to decrease the Abandonment Rate to the compliant 5% or less level in the Fontana service area for the years covered in the current General Rate Case.

RESPONSE NO. 1:

- i. The number of calls received in the Fontana division increased from 34,084 in 2022, to 107,783 in 2023, and 109,065 in 2024. Because there was not a commensurate increase in the number of customer service representatives (CSRs) available to answer calls, an increase in the number of abandoned calls occurred. The significant increase in the number of calls received was related to the following factors:
 - a. The resumption of disconnections for nonpayment in April 2022: In response to COVID-19, San Gabriel suspended disconnections of service for nonpayment. In April 2022, San Gabriel resumed sending notices of disconnection for nonpayment, with nearly all customers who received such notices being put on payment plans. Payment plan delinquencies then began to increase, and by early 2023, customers who were delinquent on their payment plans began receiving notices of disconnection for nonpayment. This prompted an increase in the number of calls from customers seeking to extend their payment plans, or inquiring about the LIHWAP program (explained below).
 - b. The Low Income Household Water Assistance Program (LIHWAP): From April 2023 through January 2024, San Gabriel hosted LIHWAP “popup” events nearly every month at the Fontana division office. These events were very well-attended and as a result, San Gabriel received a significant number of additional calls from customers inquiring about this program and to follow-up on LIHWAP applications previously submitted.
 - c. All calls being routed through Customer Service: Since November 2022, all calls to the Fontana division office have been routed through Customer Service because the division does not currently have a dedicated receptionist and the existing telephone system is not capable of automatically routing calls between Customer Service and other departments. As a result, all calls received through the Fontana division trunk line since November 2022, have been counted as a Customer Service call.
 - d. The implementation of a third conservation rate tier in April 2024: San Gabriel implemented a third conservation rate tier in the Fontana division in April 2024, as adopted by Decision 24-03-005. This prompted additional calls from customers with billing inquiries.
- ii. As explained in Section III.5 of EXHIBIT SG-5 (Harris) (p. 14), San Gabriel plans to upgrade the Company’s phone system during this GRC cycle. The new phone system will interface directly with the Company’s customer information system, thereby improving the Company’s annual reporting capabilities, and will enable San Gabriel to more efficiently route calls directly to other departments (e.g. Engineering, Water Quality, and Operations), which will ultimately enable the Fontana division to answer all calls within the 30-second standard.

RESPONDING WITNESS: Swift

REQUEST NO. 2:

The following questions refer to SGVWC’s most recent response to A2501001 Cal Advocates DR TGE-001 (Customer Service Metrics) as found in pdf file “TGE-001 (Response)” and Excel worksheet “TGE-001 Attachment 2.” Please answer the following questions.

- a. In Excel worksheet "TGE-001 Attachment 2," worksheet tab "LA 2020-2024," shows annual totals for Emergency Interruptions and Scheduled Interruptions for the years 2020 through 2024 in L.A. County. Please provide in a tabulated Excel Spreadsheet(s) the following information for each Emergency Interruption and Scheduled Interruption shown in worksheet tab "LA 2020-2024." Refer to the table below for a sample spreadsheet format.

- i. Whether interruption was scheduled or an emergency
- ii. Date and time of service interruption
- iii. Date and time service is restored
- iv. Number of service connections affected
- v. Equipment that operated or failed
- vi. Cause of interruption
- vii. Actions required to restore service
- viii. Identification of person reporting
- ix. Steps taken to prevent recurrence

Scheduled or Emergency	Date and time of service interruption		Date and time service restored	Number of service connections affected	Equipment that operated or failed	Cause of interruption	Actions required to restore service	Identification of person reporting	Steps taken to prevent recurrence

- b. In Excel worksheet "TGE-001 Attachment 2," worksheet tab "FONTANA 2020- 2024," shows annual totals for Emergency Interruptions and Scheduled Interruptions for the years 2020 through 2024 in Fontana. Please provide in a tabulated Excel Spreadsheet(s) the following information for each Emergency Interruption and Scheduled Interruption shown in worksheet tab "FONTANA 2020-2024." Refer to the table below for a sample spreadsheet format.

- i. Whether interruption was scheduled or an emergency
- ii. Date and time of service interruption
- iii. Date and time service is restored
- iv. Number of service connections affected
- v. Equipment that operated or failed
- vi. Cause of interruption
- vii. Actions required to restore service
- viii. Identification of person reporting
- ix. Steps taken to prevent recurrence

Scheduled or Emergency	Date and time of service interruption	Date and time service restored	Number of service connections affected	Equipment that operated or failed	Cause of interruption	Actions required to restore service	Identification of person reporting	Steps taken to prevent recurrence

RESPONSE NO. 2:

As previously discussed, San Gabriel will provide responses to question 2a and 2b no later than February 13, 2025.

RESPONDING WITNESS: Zielke

REQUEST NO. 3:

The following questions refer to SGVWC’s most recent response to A2501001 Cal Advocates DR TGE-001 (Customer Service Metrics) as found in pdf file “TGE-001 (Response)” and Excel worksheet “TGE-001 Attachment 3.” Please answer the following questions.

- a. In Excel worksheet “TGE-001 Attachment 3,” worksheet tab “LA 2020-2024,” cell E7, shows 341 complaints for “Bill Inquiries” for the year 2023 in L.A. County. Cell F7 shows 690 complaints for “Bill Inquiries” for 2024 in L.A. County. Please provide the following.
 - i. Explain in detail the reason the increase in complaints for “Bill Inquiries” from 2023 to 2024 for L.A. County.
 - ii. Provide the following information in a tabulated Excel spreadsheet for each “Bill Inquiries” complaint from the year 2024 in L.A. County: unique customer account number, date that the complaint was received, date that the complaint was resolved, detailed description of the complaint, detailed description of complaint resolution and/or steps taken towards a resolution, etc. Please refer to the table below for a sample spreadsheet format. Please add additional information columns as needed.

Customer Account Number	Date Received	Date Resolved	Comments /Description of Complaint	Resolution Description / Resolution Steps	

- b. In Excel worksheet “TGE-001 Attachment 3,” worksheet tab “FONTANA 2020-2024,” cell E7, shows 783 complaints for “Bill Inquiries” for the year 2023 in Fontana. Cell F7 shows 734 complaints for “Bill Inquiries” for 2024 in Fontana. Please provide the following.
- i. Explain in detail the reason the continued high number of complaints for “Bill Inquiries” from 2023 to 2024 for Fontana.
 - ii. Provide the following information in a tabulated Excel spreadsheet for each “Bill Inquiries” complaint from the year 2024 in Fontana: unique customer account number, date that the complaint was received, date that the complaint was resolved, detailed description of the complaint, detailed description of complaint resolution and/or steps taken towards a resolution, etc. Please refer to the table below for a sample spreadsheet format. Please add additional information columns as needed.

Customer Account Number	Date Received	Date Resolved	Comments / Description of Complaint	Resolution Description	

- c. In Excel worksheet “TGE-001 Attachment 3,” worksheet tab “FONTANA 2020-2024,” cell E4, shows 66 complaints for “Pressure (High or Low)” for the year 2023 in Fontana. Cell F4 shows 198 complaints for “Pressure (High or Low)” for 2024 in Fontana. Please provide the following.
- i. Explain in detail the reason the increase in complaints for “Pressure (High or Low)” from 2023 to 2024 for Fontana.
 - ii. Provide the following information in a tabulated Excel spreadsheet for each “Pressure (High or Low)” complaint from the year 2024 in Fontana: unique customer account number, date that the complaint was received, date that the complaint was resolved, detailed description of the complaint, detailed description of complaint resolution and/or steps taken towards a resolution, etc. Please refer to the table below for a sample spreadsheet format. Please add additional information columns as needed.

Customer Account Number	Date Received	Date Resolved	Comments / Description of Complaint	Resolution Description / Resolution Steps

- d. In Excel worksheet "TGE-001 Attachment 3," worksheet tab "LA 2020-2024," cell E4, shows 67 complaints for "Pressure (High or Low)" for the year 2023 in County. Cell F4 shows 41 complaints for "Pressure (High or Low)" for 2024 in L.A. County. Please provide the following.
- i. Provide the following information in a tabulated Excel spreadsheet for each "Pressure (High or Low)" complaint from the year 2024 in L.A. County: unique customer account number, date that the complaint was received, date that the complaint was resolved, detailed description of the complaint, detailed description of complaint resolution and/or steps taken towards a resolution, etc. Please refer to the table below for a sample spreadsheet format. Please add additional information columns as needed.

Customer Account Number	Date Received	Date Resolved	Comments / Description of Complaint	Resolution Description / Resolution Steps	

RESPONSE NO. 3:

As previously discussed, San Gabriel will provide responses to questions 3a and 3b no later than February 21, 2025.

- 3c.
- i. In 2023, because of retirements, promotions, and leaves of absences, San Gabriel hired three temporary Customer Service Representatives ("CSRs") that had little-to-no experience in the water utility industry, and out of an abundance of caution the CSR's created "Pressure (High Low)" work orders, assigning Field Service Operators to assist customers with their inquiries. In completing the "Pressure (High Low)" complaints, the Field Service Operators found that many of the customers had failing pressure regulators installed at their homes due to the age of the homes and galvanized pipes. The Field Service Operators recommended the customers do annual flushing of their water heaters to avoid sediment build-up, regularly clean faucet aerators, and continue checking their piping to avoid any future issues.
- ii. Please see \TGE-003 ATTACHMENT 3.xlsx.\
- 3d.
- i. Please see \TGE-003 ATTACHMENT 3.xlsx.\

RESPONDING WITNESS: Swift

Mehboob Aslam
Response to TGE-003

-7-

February 6, 2025

Please call me at (626) 448-6183 with any questions regarding this information.

Sincerely,

/s/ Joel M Reiker

Joel M. Reiker
Vice President, Regulatory Affairs

Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)
/encl.

Attachment 3-4: Response to TGE-017

SAN GABRIEL VALLEY WATER COMPANY

May 30, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: Response to Data Request No. TGE-017 (Telephone Performance Standards)

Dear Mr. Aslam:

In response to your data request dated May 23, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

In SGVWC's response to TGE-001, SGVWC provided Excel file TGE-001 Attachment 1, which shows that Fontana division did not comply with General Order 103-A's telephone Abandonment Rate requirement of 5.0% or less for the years 2023 and 2024. TGE-001 Attachment 1 also shows that SGVWC's Los Angeles County (LAC) division complied with the Abandonment Rate requirement for the years 2023 and 2024. In SGVWC's response to Data Request TGE-003, SGVWC cites four primary reasons for Fontana division's non-compliance with GO 103-A's Abandonment Rate requirement.

Please answer the following questions.

- a. In response to TGE-003, Question 1a, SGVWC writes that the resumption of disconnections for nonpayment in April 2022 contributed to "an increase in the number of calls from customers seeking to extend their payment plans, or inquiring about the LIHWAP program" in the Fontana division. Did SGVWC's LAC division also see a similar increase in calls due to the resumption of disconnections for nonpayment? If the answer is "yes," please explain in detail how LAC division was able to comply with the Abandonment Rate requirement despite this increase. If the answer is "no," please explain in detail why LAC division did not see an increase in calls whereas Fontan division did see this increase.
- b. In response to TGE-003, Question 1a, SGVWC writes:

11142 GARVEY AVENUE • P.O. BOX 6010 • EL MONTE, CALIFORNIA 91734-2010 • (626) 448-6183 • Fax (626) 448-5530

From April 2023 through January 2024, San Gabriel hosted LIHWAP “popup” events nearly every month at the Fontana division office. These events were very well-attended and as a result, San Gabriel received a significant number of additional calls from customers inquiring about this program and to follow-up on LIHWAP applications previously submitted.

Did SGVWC’s LAC division also host LIHWAP popup events that were well attended and resulted in a significant number of additional calls? If the answer is “yes,” please explain in detail how LAC division was able to comply with the Abandonment Rate requirement despite this increase in additional calls. If the answer is “no,” please explain in detail why LAC division did not see an increase in calls whereas Fontana division did see this increase.

- c. In response to TGE-003, Question 1a, SGVWC writes:

Since November 2022, all calls to the Fontana division office have been routed through Customer Service because the division does not currently have a dedicated receptionist and the existing telephone system is not capable of automatically routing calls between Customer Service and other departments. As a result, all calls received through the Fontana division trunk line since November 2022, have been counted as a Customer Service call.

Did SGVWC’s LAC division also observe similar problems as Fontana division, such as a lack of a dedicated receptionist and a telephone system incapable of routing calls between Customer Service and other departments? If the answer is “yes,” please explain in detail how LAC division was able to comply with the Abandonment Rate despite the similarity in problems between the two divisions. If the answer is “no,” please explain in detail why LAC division does not observe these problems with its reception staffing and telephone system, whereas Fontana division does.

- d. In response to TGE-003, Question 1a, SGVWC writes “San Gabriel implemented a third conservation rate tier in the Fontana division in April 2024, as adopted by Decision 24-03-005. This prompted additional calls from customers with billing inquiries.” Did SGVWC’s LAC division also implement an additional conservation rate tier from the years 2023 to 2024? If the answer to this question is “yes,” did LAC division receive additional calls from customers with billing inquiries as a result of this additional conservation rate tier? If the answer to this question is “yes,” please explain in detail how LAC division was able to comply with the Abandonment Rate requirement despite this increase in calls from customers with billing inquiries. If LAC division implemented an additional conservation rate tier but did not see an increase in customer calls with billing inquiries, please explain in detail why LAC division did not see an increase in customer calls, whereas Fontana division did see an increase.

RESPONSE NO. 1:

- a. Yes, San Gabriel’s LAC division saw a similar increase in calls due to the resumption of disconnections for non-payment. The LAC division was able to comply with the Abandonment Rate requirement despite not having an Automated Call Distribution System (ACD) for the following reasons:

- LAC division Receptionist: The LAC division office's dedicated receptionist can route all incoming calls to either customer service or other departments unlike the Fontana Division, where all incoming calls are routed directly through customer service and are thus considered to be customer service calls. An ACD, which San Gabriel does not currently have, would appropriately route all incoming calls in both divisions.
 - Historical Call Volume: The LAC division has considerably lower call volume annually.
 - 2023 Customer calls: LAC- 59,037 Fontana- 107,783
 - 2024 Customer calls: LAC- 62,469 Fontana- 109,065
 - Offices: The LAC division has a total of three offices located in the City of El Monte, City of Industry, and Whittier. Each of these offices has their own dedicated phone number for customers to call if they have questions related to water bill, tier rates, advice letters, conservation, bill inquiries, etc.
- b. San Gabriel's LAC division only hosted four one-day "popup" events compared to the Fontana division having hosted two-day popup events nearly every month from April 2023 through January 2024. As a result, the LAC division would have received fewer calls resulting from such popup events. The reason the LAC division hosted significantly fewer popup events was because the Long Beach Community Action Partnership (LBCAP), which assigned to administer the LIHWAP program in the Los Angeles County area by the California Department of Community Services and Development (CSD), was not interested in hosting popup events until the very end of the LIHWAP program in late 2023. Despite the LAC division hosting one-day "popup" events for four months, the LAC division did not have as many customers take advantage of the low-income program versus the Fontana division office, resulting in fewer calls seeking information about LIHWAP.
- c. As explained in the response to question 1a, San Gabriel has a dedicated receptionist in the LAC division who routes all incoming calls to the appropriate department, as the company does not currently have an ACD. Moreover, the LAC Division's annual customer service-related call volume is considerably lower than the Fontana division.
- d. Yes, San Gabriel's LAC division also implemented a third conservation rate tier in April of 2024. The LAC division was able to comply with the Abandonment Rate requirement despite an increase in the number of calls for the reasons explained above in the response questions a – c, despite not having an ACD.

RESPONDING WITNESSES: Swift

Mehboob Aslam
Response to TGE-017

-4-

May 30, 2025

Please call me at (626) 448-6183 with any questions regarding this information.

Sincerely,

/s/ Joel M Reiker

Joel M. Reiker
Vice President, Regulatory Affairs

Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)

/encl.

Attachment 3-5: American Water Infrastructure Act Section 2013 Screenshot

Note: Retrieved from www.epa.gov/waterresilience/awia-section-2013#ERP .
Retrieved May 1, 2025.

ERP Requirements and Assistance Resource for CWSs that Serve More than 3,300

No later than six months after certifying completion of its RRA, each system must prepare or revise, where necessary, an ERP that incorporates the findings of the RRA. The ERP shall include:

1. strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system;
2. plans and procedures that can be implemented, and identification of equipment that can be utilized, in the event of a malevolent act or natural hazard that threatens the ability of the community water system to deliver safe drinking water;
3. actions, procedures and equipment which can obviate or significantly lessen the impact of a malevolent act or natural hazard on the public health and the safety and supply of drinking water provided to communities and individuals, including the development of alternative source water options, relocation of water intakes and construction of flood protection barriers; and
4. strategies that can be used to aid in the detection of malevolent acts or natural hazards that threaten the security or resilience of the system.

Community water systems shall to the extent possible coordinate with local emergency planning committees established under the Emergency Planning and Community Right-To-Know Act of 1986 when preparing or revising an RRA or ERP under SDWA section 1433. Further, systems must maintain a copy of the RRA and ERP for five years after certifying the plan to the EPA.

ERP Assistance Resources

- [Emergency Response Plan Template and Instructions](#) - This resource is intended to help you develop an ERP that meets the requirements of SDWA section 1433.
 - **Resource to help with the cybersecurity component of the ERP**
 - [Cybersecurity Incident Action Checklist](#) - This resource provides on-the-go convenience, to help utilities prepare for, respond to, and recover from a cyber incident through a checklist of activities. The checklist can be added to an ERP to address cybersecurity response.
-

Attachment 3-6: Response to TGE-008

SAN GABRIEL VALLEY WATER COMPANY

March 27, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: **Response to Data Request No. TGE-008 (Emergency Response Plan)**

Dear Mr. Aslam:

In response to your data request dated March 20, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

Please refer to SGVWC application file “EXHIBIT SG-7 (Zielke).pdf,” at pages 19 to 20. SGVWC states, “Both the FWC and LAC divisions submitted and certified their RRAs [Risk and Resilience Assessments] in March 2020, and updated and submitted their ERPs to the EPA in September 2020.” Please answer the following.

- a. Did SGVWC provide copies of their Emergency Response Plans (ERPs) for the Fontana and Los Angeles County (LAC) divisions in its application filing for this current General Rate Case (GRC)? If the answer is “yes,” please provide the exact application file names and if necessary, the exact page numbers which contain the ERPs. If the answer is “no,” please provide complete copies of the Fontana and LAC ERPs submitted by SGVWC to the Environmental Protection Agency (EPA) in September 2020.

RESPONSE NO. 1:

No. SGVWC submitted copies of the Company’s Emergency Response Plan (ERPs) Certification Statements that were sent to the Environmental Protection Agency (EPA) in September 2020, for the Fontana and Los Angeles County (LAC) divisions, in its application filing for this current General Rate Case (GRC).

EPA does not require a copy of the ERPs. EPA only requires a copy of the ERPs Certification Statement, pursuant to America's Water Infrastructure Act (AWIA) Section 2013(a).

Please see attached copies of September 2020 ERPs for the LAC and FWC divisions.

RESPONDING WITNESSES: ZIELKE

REQUEST NO. 2:

Does SGVWC, in its ERPs or elsewhere, have a contingency plan in place for the current existing reservoir at LAC division's Plant B14 in case of a natural disaster or other event, which would render the reservoir inoperable and unable to serve customers in LAC?

- a. If the answer to Question 2 is "yes," please provide the exact page numbers in the LAC ERP which discusses this contingency plan.
- b. If SGVWC's contingency plan for the reservoir at Plant B14 is not included in the ERP but is addressed elsewhere, please provide a complete copy of this contingency plan. If the contingency plan for Plant B14's reservoir is part of a larger file, please provide a copy of the entire file, as well as provide the exact page numbers containing this contingency plan.
- c. If SGVWC does not have any contingency plan in place for Plant B14's existing reservoir, please explain in detail why SGVWC does not have this plan in place.

RESPONSE NO. 2:

- a. The LAC division's ERP does not include or require a specific contingency plan for any specific plant site.
- b. In the event of a natural disaster or other event which would render the existing Plant B14 reservoir inoperable and unable to serve customers in LAC, LAC would implement any and all applicable sections of the LAC division's ERP as needed in response to the natural disaster or other event.
- c. At this time, there is no existing site-specific contingency plan at Plant B14. However, San Gabriel has proactively designed and permitted a second semi-underground concrete reservoir at the site. The project is designed and permitted and is currently moving forward to the bidding phase.

Mehboob Aslam
Response to TGE-008

-3-

March 27, 2025

RESPONDING WITNESSES: ZIELKE

Please call me at (626) 448-6183 with any questions regarding this information.

Sincerely,

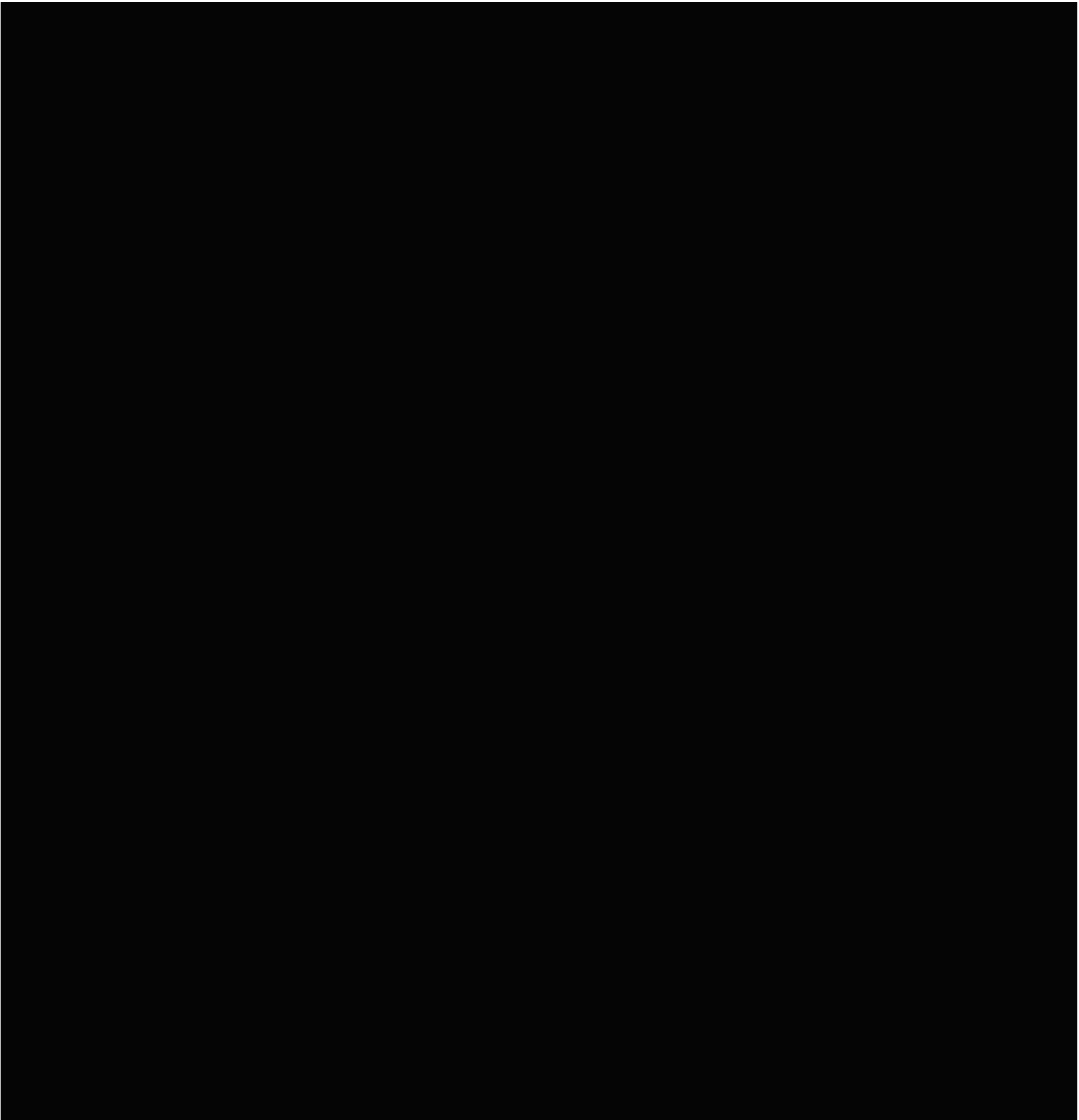
/s/ Joel M Reiker

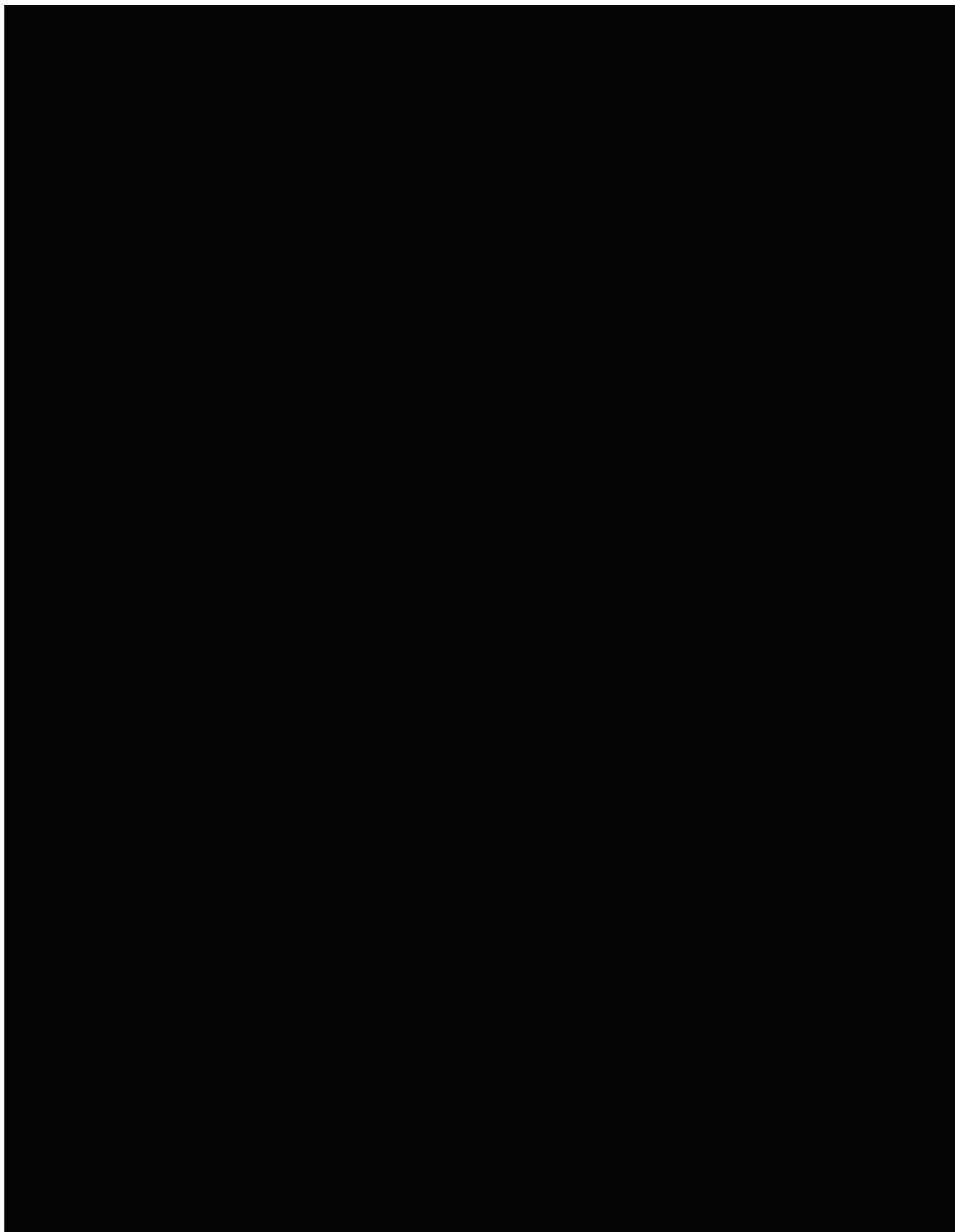
Joel M. Reiker
Vice President, Regulatory Affairs

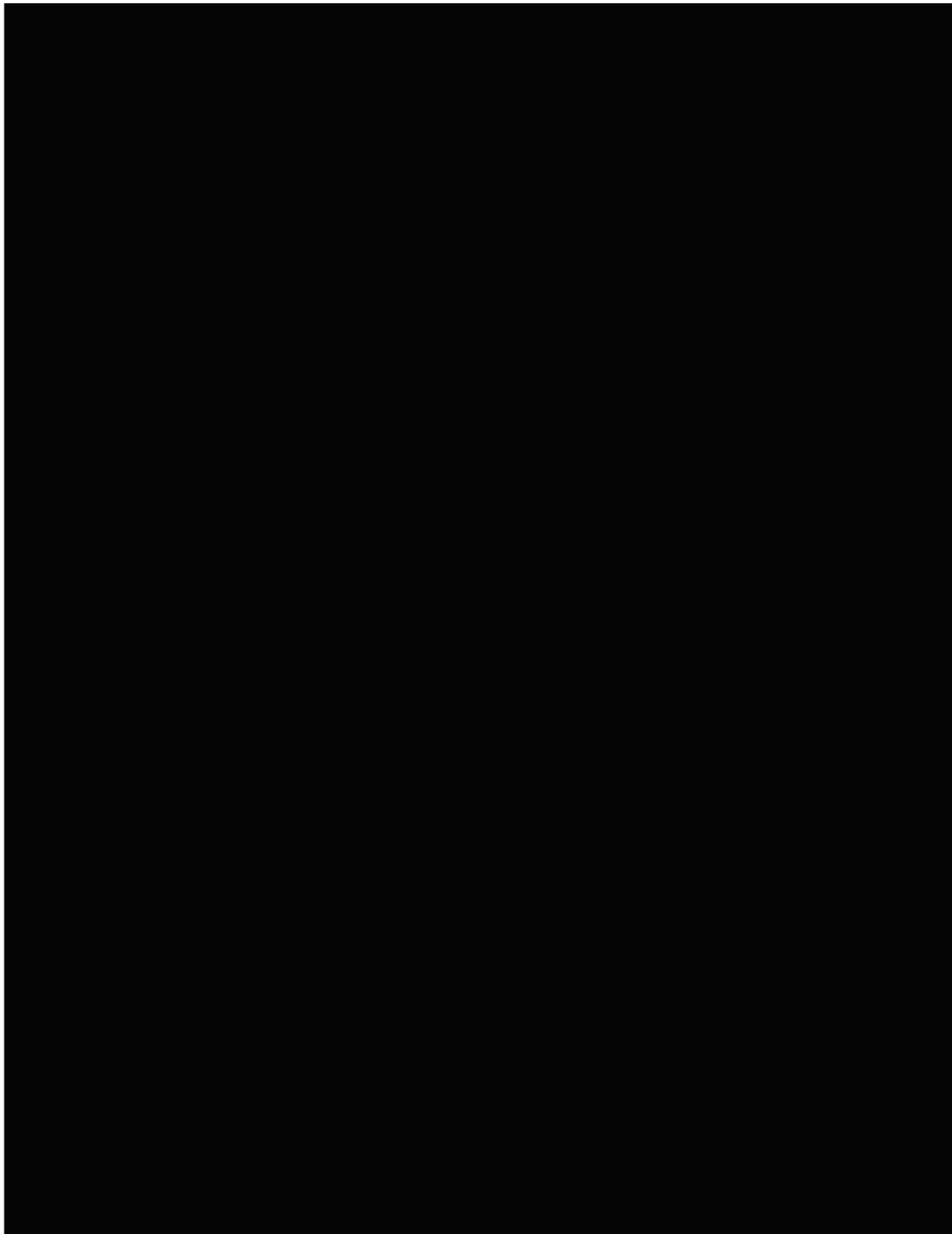
Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)

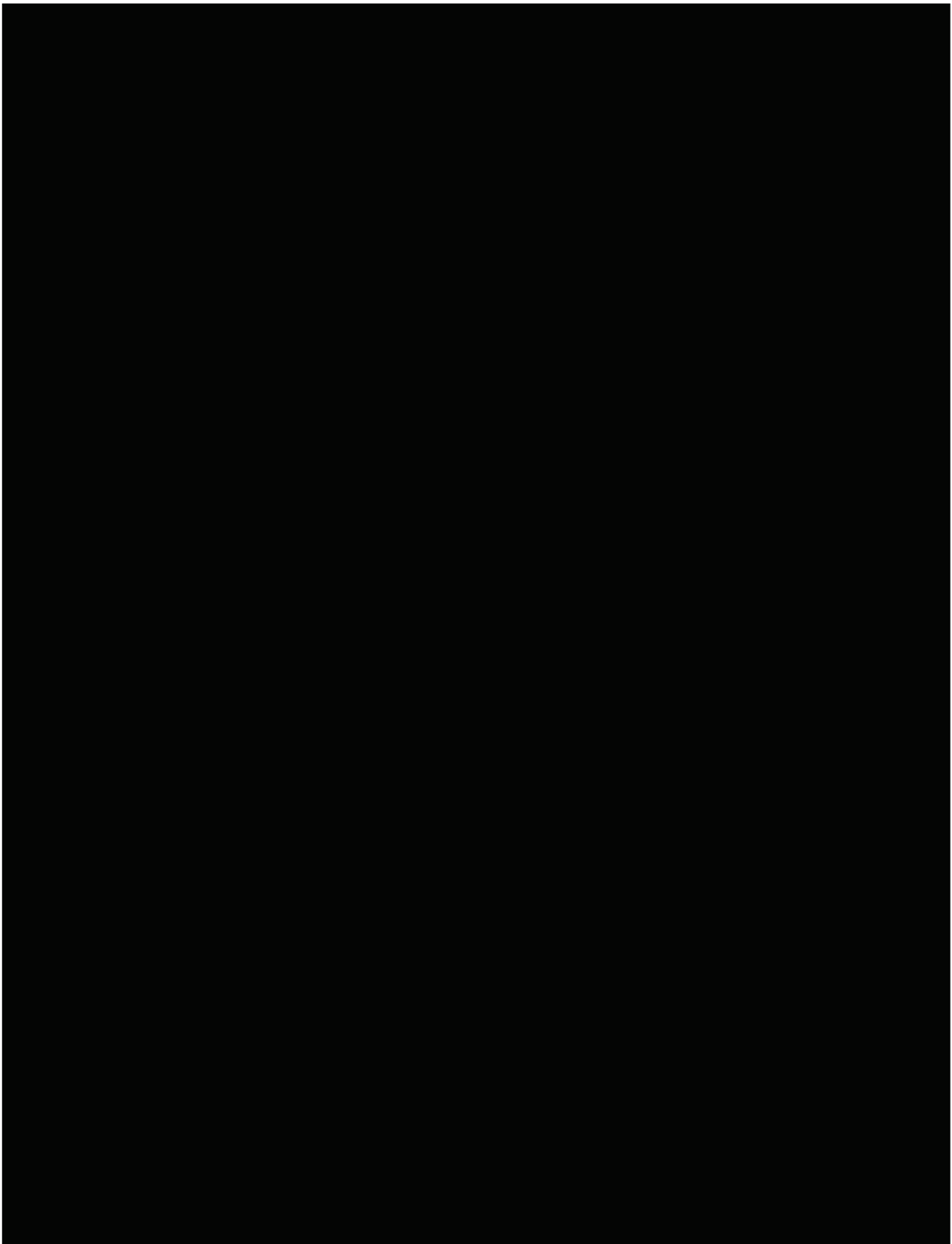
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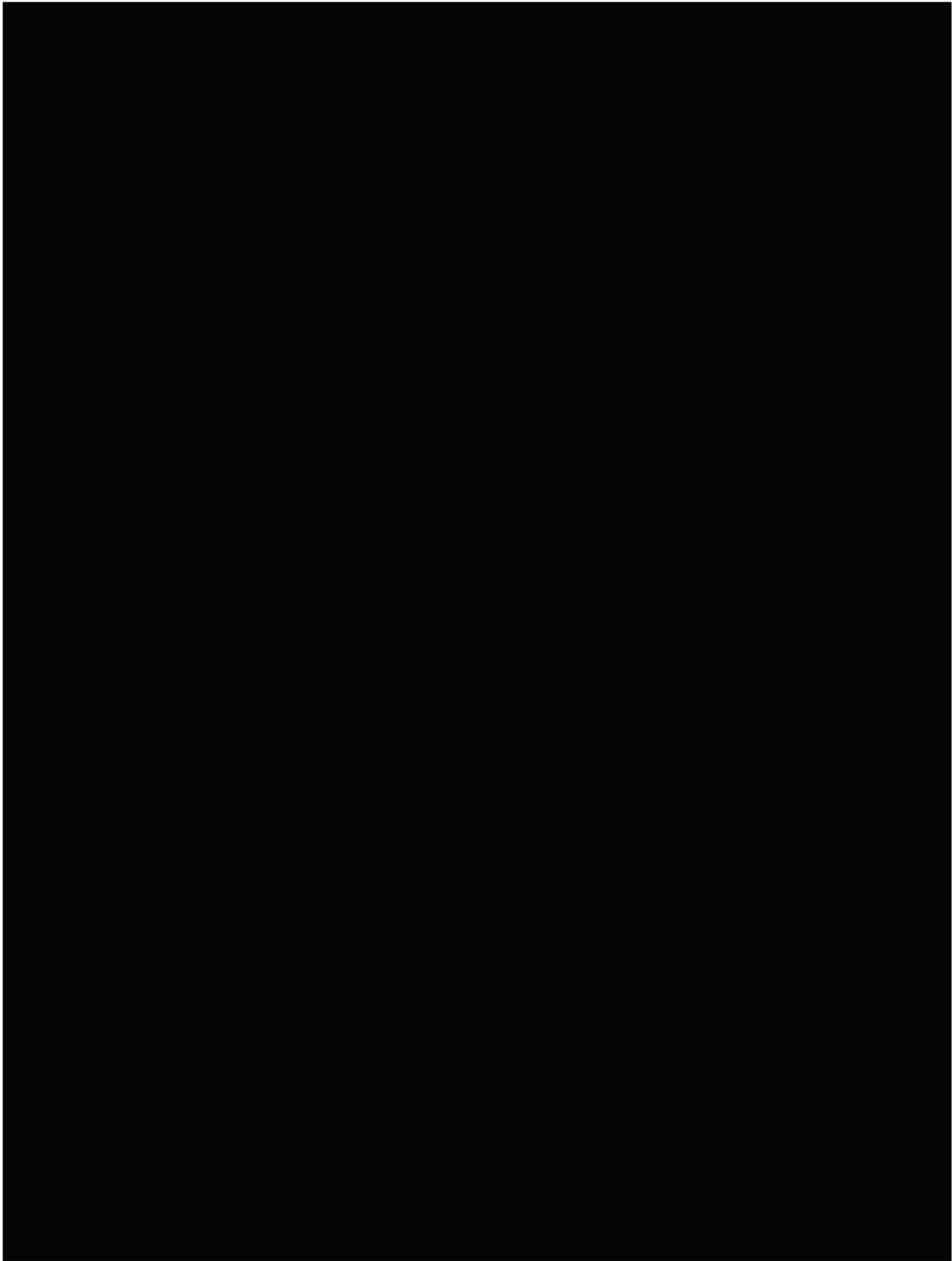
CONFIDENTIAL Attachment 3-7: Excerpt from SGVWC
LA Emergency Response Plan











LIST OF ATTACHMENTS FOR CHAPTER 5

#	Attachment #	Description
1	5-1	Excerpt from Environmental Social Justice Action Plan 2.0 Goals
2	5-2	Excerpt from CPUC Report on 2023 Supplier Diversity Procurement
3	5-3	Response to TGE-011
4	5-4	General Order 156 Revised April 2022

Attachment 5-1: Excerpt from Environmental Social Justice Action Plan 2.0 Goals

Note: Attachment 5-1 includes page excerpts showing the Environmental and Social Justice Action Plan goals and the plan's statement on compliance and enforcement. The full ESJ Action Plan may be found at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf>. Retrieved May 1, 2025.



Environmental & Social Justice Action Plan

Version 2.0

April 7, 2022



California Public
Utilities Commission

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Executive Summary

Background & Progress on Implementation

The CPUC's Environmental and Social Justice (ESJ) Action Plan serves as both a commitment to furthering principles of environmental and social justice, as well as an operating framework with which to integrate ESJ considerations throughout the agency's work. Version 1.0 of the CPUC's ESJ Action Plan, adopted in February 2019 consisted of nine overarching goals, clear objectives, and 95 concrete action items to ensure agency-wide collaboration, accountability, and forward movement in meeting ESJ principles.

The ESJ Action Plan 1.0 also established a definition of "Environmental and Social Justice (ESJ) Communities" for the purposes of CPUC policy and programs, as predominantly communities of color or low-income communities that are underrepresented in the policy setting or decision-making process, subject to a disproportionate impact from one or more environmental hazards, and are likely to experience disparate implementation of environmental regulations and socioeconomic investments in their communities. Under this definition the CPUC aimed to target the following communities:

- Disadvantaged Communities, defined as census tracts that score in the top 25% of CalEnviroScreen 3.0, along with those that score within the highest 5% of CalEnviroScreen 3.0's Pollution Burden but do not receive an overall CalEnviroScreen score;¹²
- All Tribal lands³;
- Low-income households (Household incomes below 80 percent of the area median income); and
- Low-income census tracts (Census tracts where aggregated household incomes are less than 80 percent of area or state median income).

Since adopting Version 1.0 of the ESJ Action Plan, the CPUC has made significant progress in incorporating ESJ considerations into its work, as well as creating a culture that takes into serious account the lived experiences of ESJ communities. Version 2.0 of the ESJ Action Plan is updated to reflect a continuation of efforts to systematize the consideration of ESJ principles across Commission activities and incorporates two years of learnings from engagement with ESJ communities, advocates, and other stakeholders.

¹ <https://calepa.ca.gov/wp-content/uploads/sites/6/2017/04/SB-535-Designation-Final.pdf>

² This definition of "Disadvantaged Communities" reflects a small change from Version 1.0 of the ESJ Action Plan to reflect the most recent designation of "Disadvantaged Communities" by the California Environmental Protection Agency (CalEPA) in CalEnviroScreen, Version 3.0. A new version of CalEnviroScreen, Version 4.0, was finalized in October 2021 and CalEPA will make a subsequent designation of "Disadvantaged Community" given the new data. The definition in the ESJ Action Plan will be subsequently updated to reflect this change once it is in effect.

³ Land within any Indian reservation as defined in 18 U.S.C. 1151 subsection (a)

ESJ Action Plan 2.0: Updated Goals & Objectives

For Version 2.0 of ESJ Action Plan, revisions to eight of the nine goals clarify existing language; and Goal 7, related to workforce development, has been revised to include an emphasis on job quality and access. The objectives related to each goal have been revised to reflect the work of the CPUC for the upcoming three years particularly related to institutionalizing ESJ considerations into the Commission's decision-making processes.

Finally, Version 2.0 of the ESJ Action Plan includes additional narratives. These sections clarify the CPUC's intent of the ESJ Plan to be used by staff and stakeholders as a reference document when developing or responding to policies and programs under development, or as a resource document to gain a better understanding of key definitions, eligibility criteria, and how the plan has been referenced in past proceedings. Additional language reiterates that regulated entities under the CPUC's jurisdiction continue to be required to abide by all policy directives in the CPUC's final decisions.

Appendix A includes a detailed list of action items, lead staff, and tentative work plans. The list remains robust and demonstrates commitments from across our various offices and divisions, with an emphasis on more cross-agency activities to deepen impact on ESJ issues.

GOAL 1: CONSISTENTLY INTEGRATE EQUITY AND ACCESS CONSIDERATIONS THROUGHOUT CPUC REGULATORY ACTIVITIES.

REVISED OBJECTIVES:

1.1 Build Systematic Approaches for ESJ Priorities: Continue building systematic approaches for considering ESJ issues in proceedings and decisions, as well as implementation processes included in advice letters, general orders, and resolutions. Build understanding of critical ESJ concepts and definitions to ensure alignment and deepen impact.

1.2 Expand Opportunities for Access: Continue pursuing innovative approaches to broadening access to CPUC activities and decision-making.

GOAL 2: INCREASE INVESTMENT IN CLEAN ENERGY RESOURCES TO BENEFIT ESJ COMMUNITIES, ESPECIALLY TO IMPROVE LOCAL AIR QUALITY AND PUBLIC HEALTH.

REVISED OBJECTIVES:

2.1 Outreach & Engagement: Broaden and deepen outreach and engagement with ESJ communities early in proceedings and processes related to resilient, clean energy.

2.2 Research & Analysis to Understand Impact: Further research and analytical opportunities to understand impacts in ESJ communities.

2.3 Move Towards Mutual Eligibility & Maximizing Impact: Better leverage ongoing work by fostering cross-division, cross-Commission, and cross-agency dialogues to move towards mutual eligibility and maximizing impact.

2.4 Address Impacts in ESJ Communities: Continue to address ongoing and legacy impacts in ESJ communities in the resilient, clean energy space.

2.5 Continue Ongoing Investment: Continue to make prioritized resilient, clean energy investments in ESJ communities.

GOAL 3: STRIVE TO IMPROVE ACCESS TO HIGH-QUALITY WATER, COMMUNICATIONS, AND TRANSPORTATION SERVICES FOR ESJ COMMUNITIES.

REVISED OBJECTIVES:

3.1 Equitable Clean Transportation: Pursue opportunities for ESJ communities to access clean vehicles and services from Transportation Network Companies (TNCs).

3.2 Water Customer Resilience: Support ESJ customers and communities with discounted rates for low-income customers and sustainable systems.

3.3 Extend Rail Safety to ESJ Communities: Pursue opportunities to bolster safety along rail lines in ESJ communities.

3.4 Extend Essential Communications Services to ESJ Communities: Ensure implementation of new investments that offer ESJ communities' access to essential⁴³ communications services at affordable rates.

GOAL 4: INCREASE CLIMATE RESILIENCY IN ESJ COMMUNITIES.

REVISED OBJECTIVES:

4.1 Emphasize Adaptive Capacity: Ensure ESJ communities and considerations around their adaptive capacity is incorporated into relevant programs and activities.

GOAL 5: ENHANCE OUTREACH AND PUBLIC PARTICIPATION OPPORTUNITIES FOR ESJ COMMUNITIES TO MEANINGFULLY PARTICIPATE IN THE CPUC'S DECISION-MAKING PROCESS AND BENEFIT FROM CPUC PROGRAMS.

REVISED OBJECTIVES:

5.1 Improve Communication with ESJ Lens: Continue to build and improve CPUC communications methods and materials to ensure ESJ audiences can better participate.

5.2 Continue to Emphasize Engagement with CBOs: Deepen relationships and network connections with community-based organizations throughout the state.

^{43 43} Decision 20-07-032 <http://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=344049206>

5.3 Build Pathways for Public Participation: Based on lessons learned and areas of improvement, build additional and enhanced pathways to welcome and involve ESJ stakeholders into CPUC processes.

5.4 Enhance Engagement with Particular ESJ Communities: Consider the specific needs of particular populations and work to create targeted engagement opportunities.

GOAL 6: ENHANCE ENFORCEMENT TO ENSURE SAFETY AND CONSUMER PROTECTION FOR ALL, ESPECIALLY FOR ESJ COMMUNITIES.

REVISED OBJECTIVES:

6.1 Protect ESJ Consumers: Track complaints from ESJ communities and protect against fraud and unfair business practices in CPUC-regulated industries.

6.2 Conduct Proactive Action & Analysis in Transportation and Utility Enforcement: Utilize existing data and enforcement authority to focus on serving ESJ communities and understanding their needs.

6.3 Apply ESJ Lens to CPUC Enforcement Policy: Ensure implementation of Enforcement Policy includes opportunities for ESJ communities to benefit from maximum compliance with CPUC rules and regulations.

6.4 Maximize Opportunities within Utility Audits: Incorporate strategies for engaging with ESJ communities and understanding cumulative impact.

REVISED GOAL 7: PROMOTE HIGH ROAD ⁴⁴ CAREER PATHS AND ECONOMIC OPPORTUNITY FOR RESIDENTS OF ESJ COMMUNITIES.

REVISED OBJECTIVES:

7.1 Maximize Authority to Promote High Road: Continue implementing MOU with CA Workforce Development Board to develop proceeding record and outreach to nontraditional partners to understand opportunities for CPUC to maximize jurisdiction and authority to promote high road careers.

7.2 Educate on High Road Careers: Provide opportunities to educate CPUC staff on high road career paths, best practices, and opportunities to integrate into CPUC programs.

7.3 Partner with Utilities and Sister Agencies: Engage sister agencies with authority and expertise on workforce-related issues and regulated utilities in promoting economic opportunity for ESJ communities.

⁴⁴https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=UIC&division=7.&title=&part=&chapter=2.&article

GOAL 8: IMPROVE TRAINING AND STAFF DEVELOPMENT RELATED TO ENVIRONMENTAL AND SOCIAL JUSTICE ISSUES WITHIN THE CPUC'S JURISDICTION.

REVISED OBJECTIVES:

8.1 Bolster Staff Knowledge on ESJ Issues and Resources: Provide ongoing training to new and existing employees on ESJ issues and continue to offer resources and tools to support staff learning.

8.2 Support Emerging Priorities and Skill Needs: Work in solidarity with other ESJ-aligned plans and efforts and offer new training opportunities to support shared goals.

GOAL 9: MONITOR THE CPUC'S ENVIRONMENTAL AND SOCIAL JUSTICE EFFORTS TO EVALUATE HOW THEY ARE ACHIEVING THEIR OBJECTIVES.

REVISED OBJECTIVES:

9.1 Establish Consistent Quantitative Metrics: Pursue opportunities to standardize metrics related to ESJ communities in CPUC programs and proceedings.

9.2 Promote Meaningful Feedback Loops: Cultivate and deepen avenues to receive feedback from the public and demonstrate resulting impact back to members of the public.

9.3 Establish Accountability Measures: Establish a public mechanism for reporting the CPUC's progress towards achieving goals of the ESJ Action Plan.

Utilizing the ESJ Plan as Resource

The ESJ Action Plan is intended to serve as a resource for CPUC staff, intervenors, stakeholders, and the public. The goals and objectives provide the broad vision and steps the CPUC will take to ensure equity in its programs and services. The action items serve as a tracking mechanism to remain transparent about the concrete actions the CPUC is taking with regards to embedding ESJ principles into its work. Finally, the appendices which include definitions, program criteria, and examples of past decisions are included as reference materials to be cited or used as reference material by CPUC staff and/or any individual or organization that interacts with the CPUC.

Compliance and Enforcement

The CPUC expects regulated entities to conform to the goals and principles outlined in the ESJ Action Plan. As the goals and objectives in the plan, or the plan itself, will be referenced and cited in Commission decisions, when appropriate, regulated entities are expected to continue to abide by language in final decisions. The CPUC will continue to use its discretion and broad authority to take enforcement actions as appropriate.

Attachment 5-2: Excerpt from CPUC Report on 2023 Supplier Diversity Procurement

Note: Attachment 5-2 includes page excerpts focusing on data related to SGVWC. The full CPUC report to the Legislature may be found at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/bco/go-156-annual-reports/2024-go-156-legislative-report-final-08-28-24.pdf> . Retrieved May 1, 2025.



Year 2023 Utilities Procurement of Goods, Services, and Fuel from Women, Minority, Disabled Veteran, LGBT, and Persons with Disabilities Business Enterprises

SEPTEMBER 2024



**California Public
Utilities Commission**

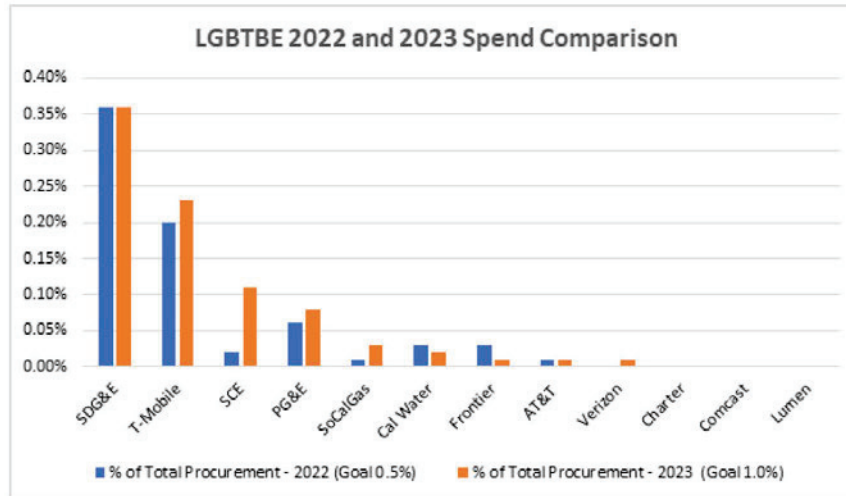
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CPUC REPORT TO THE LEGISLATURE ON UTILITIES', CCAS', AND ESPS'
YEAR 2023 DIVERSE SUPPLIER PROCUREMENT

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CALIFORNIA PUBLIC UTILITIES COMMISSION



Small Utilities Procurement Results

The small utilities represent approximately 2.4 percent (\$1.1 billion) of the total procurement reported by all the utilities in 2023 (the combined large and small utilities' total procurement in 2023 was \$44.8 billion). The small utilities that report under the GO 156 program are:

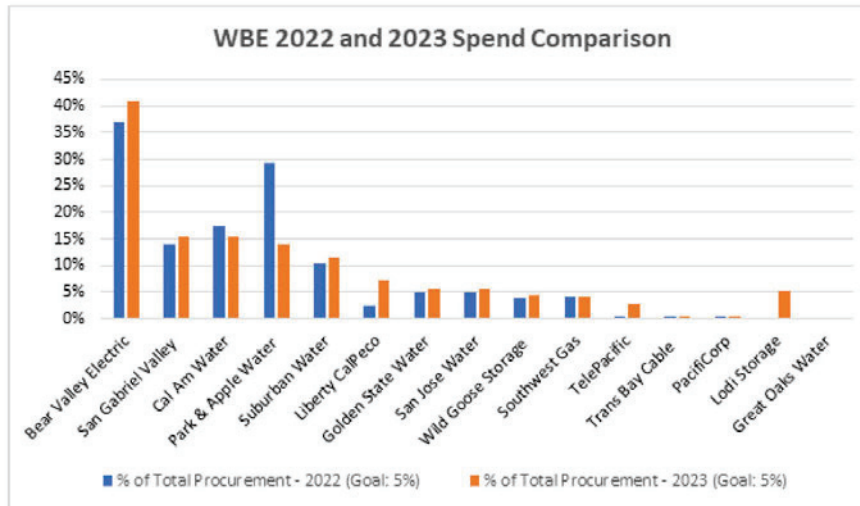
- Bear Valley Electric Service, Inc. (Bear Valley Electric)
- California American Water Company (Cal Am Water)
- Golden State Water Company (Golden State Water)
- Great Oaks Water Company (Great Oaks)²⁶
- Liberty Utilities Corp. – Park Water and Apple Valley Ranchos (Park & Apple Valley Water)
- Liberty Utilities, LLC – CalPeco Electric (Liberty CalPeco)
- Lodi Gas Storage (Lodi Storage)
- Pacific Power (PacifiCorp)
- San Gabriel Valley Water Company (San Gabriel Valley Water)
- San Jose Water Company (San Jose Water)
- Southwest Gas
- Suburban Water Systems (Suburban Water)
- U.S. TelePacific Communications (TelePacific)
- Trans Bay Cable, LLC (Trans Bay Cable)



²⁶ Great Oaks Electric fell below \$25 million in procurement spend with diverse suppliers in 2022 and was not required to submit a report. The comparison charts will reflect no spend data for Great Oaks Electric in 2022.

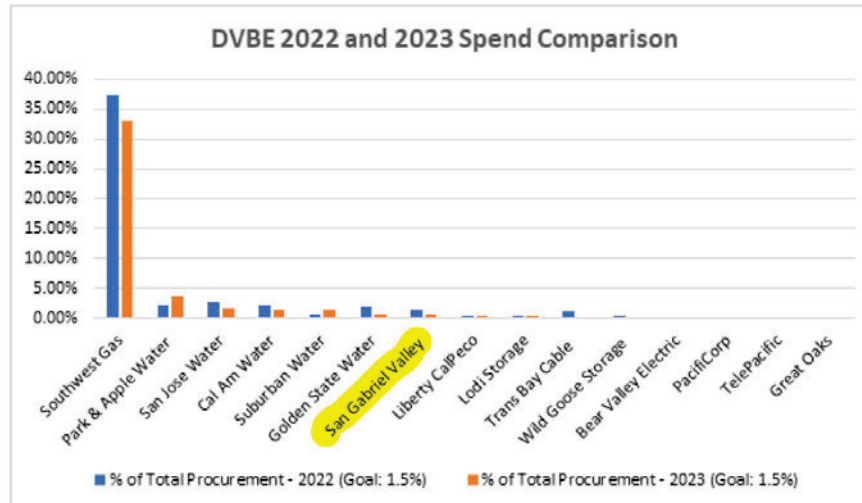
3. Small Utilities WBE Procurement Results

Overall, the small utilities increased procurement from WBEs – from \$77.9 million (7.8 percent) in 2022 to \$87.3 million (8 percent) in 2023 and met the 5 percent goal. Of the fifteen small utilities, nine met the procurement goal of 5 percent with WBEs and six did not. Cal Am Water achieved the highest WBE spend percentage of total procurement (20.1 percent), and Great Oaks did not procure from WBEs in 2023 (see Tables 3, 2a, and 2b in Attachment A).



4. Small Utilities DVBE Procurement Results

The small utilities' DVBE procurement decreased by 15.4 percent from \$49.9 million in 2022 to \$42.2 million in 2023. The DVBE percentage of total procurement also decreased from 5.0 percent to 3.9 percent, surpassing the 1.5 percent DVBE goal. Park and Apple Water (3.65 percent), San Jose Water (1.72), and Southwest Gas (33.19) reported achieving the 1.5 percent procurement goal, while Bear Valley Electric, Cal Am Water, Golden State Water, Great Oaks, Liberty CalPeco, Lodi Storage, PacifiCorp, San Gabriel Valley Water, Suburban Water, TelePacific, Trans Bay Cable, and Wild Goose did not meet the goal (see Tables 3, 2a, 2b, 7a, and 7b in Attachment A).



5. Small Utilities LGBTBE Procurement Results

The small utilities spend with LGBTBEs increased by 103.4 percent in 2023 from \$8.8 million in 2022 to \$17.9 million and the percentage of total procurement also increased from 0.9 percent to 1.63 percent, exceeding the goal of 1.0 percent. Suburban had the highest percentage of total procurement (13 percent), followed by Cal Am Water (6.8 percent). In 2023, Bear Valley, Golden State Water, Great Oaks, Liberty CalPeco, Lodi Storage, PacificCorp, Park and Apple Water, San Jose Water, TelePacific, and Wild Goose did not procure from LGBTBEs (see Tables 3, 2a, 2b, 8a, and 8b in Attachment A).

Table 2a 2023 Supplier Diversity Results for Small Utilities (In Dollars and as a Percentage of Total Corporate Procurement)							
	2023 Total Procurement	MBE	WBE	DVBE	LGSTBE	PDBE	Total Supplier Diversity
Lodi Storage							
	Direct	\$121,036	\$473,146	\$12,941	\$0	\$0	\$607,121
	Subcontracting	1.37%	5.36%	0.15%	0.00%	0.00%	6.89%
	Combined	\$0	\$0	\$0	\$0	\$0	\$0
	Direct	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Subcontracting	\$8,821,834	\$121,036	\$473,146	\$12,941	\$0	\$9,438,957
	Combined	100.00%	1.37%	5.36%	0.15%	0.00%	6.89%
2023 Total Procurement							
	2023 Total Procurement	MBE	WBE	DVBE	LGSTBE	PDBE	Total Supplier Diversity
PacifiCorp							
	Direct	\$3,899,880	\$400,466	\$0	\$0	\$0	\$4,300,346
	Subcontracting	2.85%	0.29%	0.00%	0.00%	0.00%	3.14%
	Combined	\$400,472	\$0	\$0	\$0	\$0	\$400,472
	Direct	0.29%	0.00%	0.00%	0.00%	0.00%	0.29%
	Subcontracting	\$139,915,220	\$4,387,432	\$400,466	\$0	\$0	\$144,703,118
	Combined	100.00%	3.14%	0.29%	0.00%	0.00%	3.42%
2023 Total Procurement							
	2023 Total Procurement	MBE	WBE	DVBE	LGSTBE	PDBE	Total Supplier Diversity
Park & Apple Water							
	Direct	\$1,774,843	\$1,154,046	\$417,936	\$0	\$0	\$3,346,825
	Subcontracting	15.19%	10.16%	3.64%	0.00%	0.00%	26.99%
	Combined	\$289,128	\$425,367	\$1,500	\$0	\$0	\$715,895
	Direct	2.91%	3.75%	0.00%	0.00%	0.00%	6.66%
	Subcontracting	\$11,355,856	\$2,020,971	\$1,679,412	\$414,425	\$0	\$15,470,664
	Combined	100.00%	17.80%	13.81%	3.65%	0.00%	35.35%
2023 Total Procurement							
	2023 Total Procurement	MBE	WBE	DVBE	LGSTBE	PDBE	Total Supplier Diversity
San Gabriel Valley							
	Direct	\$14,573,430	\$14,018,410	\$465,215	\$3,121,490	\$0	\$32,178,635
	Subcontracting	16.97%	15.46%	0.53%	3.44%	0.00%	36.50%
	Combined	\$640,000	\$5,677	\$0	\$0	\$0	\$645,677
	Direct	0.71%	0.01%	0.00%	0.00%	0.00%	0.71%
	Subcontracting	\$80,838,050	\$16,219,530	\$14,022,037	\$465,215	\$3,121,490	\$114,666,362
	Combined	100.00%	16.78%	15.46%	0.53%	3.44%	37.21%
2023 Total Procurement							
	2023 Total Procurement	MBE	WBE	DVBE	LGSTBE	PDBE	Total Supplier Diversity
San Jose Water							
	Direct	\$38,064,656	\$4,834,135	\$1,237,308	\$0	\$0	\$43,906,099
	Subcontracting	25.98%	3.10%	0.76%	0.00%	0.00%	30.84%
	Combined	\$4,141,919	\$3,699,175	\$1,440,303	\$0	\$1,902	\$9,283,309
	Direct	2.89%	2.35%	0.62%	0.00%	0.00%	5.86%
	Subcontracting	\$165,839,952	\$43,209,475	\$9,582,310	\$2,678,291	\$0	\$224,309,028
	Combined	100.00%	27.72%	5.46%	1.72%	0.00%	34.90%
2023 Total Procurement							
	2023 Total Procurement	MBE	WBE	DVBE	LGSTBE	PDBE	Total Supplier Diversity

Table 2b
2022 Supplier Diversity Results for Small Utilities
(in Dollars and as a Percentage of Total Corporate Procurement)

	2022 Total Procurement	MBE	WBE	DVBE	LG&TBE	PDBE	Other S(a)*	Total Supplier Diversity
Bear Valley Electric								
Direct		\$269,276 1.14%	\$8,721,295 36.97%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$8,990,571 38.11%
Subcontracting		\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%
Combined	\$23,588,969 100.00%	\$269,276 1.14%	\$8,721,295 36.97%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$8,990,571 38.11%
	2022 Total Procurement	MBE	WBE	DVBE	LG&TBE	PDBE	Other S(a)*	Total Supplier Diversity
Cal Am Water								
Direct		\$32,310,388 23.81%	\$22,661,278 16.70%	\$668,886 0.49%	\$1,773,372 1.31%	\$0 0.00%	\$0 0.00%	\$57,413,924 42.31%
Subcontracting		\$1,514,917 1.12%	\$1,026,690 0.76%	\$2,363,028 1.74%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$4,904,635 3.61%
Combined	\$135,691,414 100.00%	\$33,825,305 24.93%	\$23,687,968 17.46%	\$3,031,914 2.23%	\$1,773,372 1.31%	\$0 0.00%	\$0 0.00%	\$62,318,559 45.93%
	2022 Total Procurement	MBE	WBE	DVBE	LG&TBE	PDBE	Other S(a)*	Total Supplier Diversity
Golden State Water								
Direct		\$43,781,320 26.21%	\$8,367,853 5.01%	\$3,077,511 1.84%	\$0 0.00%	\$19,900 0.01%	\$0 0.00%	\$55,246,584 33.07%
Subcontracting		\$819,995 0.49%	\$116,984 0.07%	\$0 0.00%	\$0 0.00%	\$34,831 0.02%	\$0 0.00%	\$971,810 0.50%
Combined	\$167,042,018 100.00%	\$44,601,315 26.70%	\$8,484,837 5.08%	\$3,077,511 1.84%	\$0 0.00%	\$54,731 0.03%	\$0 0.00%	\$56,218,394 33.66%
	2022 Total Procurement	MBE	WBE	DVBE	LG&TBE	PDBE	Other S(a)*	Total Supplier Diversity
Liberty CalPeco								
Direct		\$13,986,769 18.32%	\$1,738,307 2.28%	\$189,587 0.25%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$15,914,663 20.85%
Subcontracting		\$17,083 0.02%	\$133,810 0.18%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$151,393 0.20%
Combined	\$76,327,335 100.00%	\$14,004,352 18.35%	\$1,872,117 2.45%	\$189,587 0.25%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$16,066,056 21.05%
	2022 Total Procurement	MBE	WBE	DVBE	LG&TBE	PDBE	Other S(a)*	Total Supplier Diversity
Lodi Storage								
Direct		\$148,677 1.50%	\$466,817 4.70%	\$13,530 0.14%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$629,024 6.34%
Subcontracting		\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%
Combined	\$9,926,947 100.00%	\$148,677 1.50%	\$466,817 4.70%	\$13,530 0.14%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$629,024 6.34%
	2022 Total Procurement	MBE	WBE	DVBE	LG&TBE	PDBE	Other S(a)*	Total Supplier Diversity
PacifiCorp								
Direct		\$228,545 0.30%	\$68,492 0.09%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$297,037 0.39%
Subcontracting		\$453,635 0.59%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$453,635 0.59%
Combined	\$76,535,907 100.00%	\$682,180 0.89%	\$68,492 0.09%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$750,672 0.98%
	2022 Total Procurement	MBE	WBE	DVBE	LG&TBE	PDBE	Other S(a)*	Total Supplier Diversity
Park & Apple Water								
Direct		\$6,188,383 19.77%	\$8,817,624 28.18%	\$660,025 2.11%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$15,666,032 50.06%
Subcontracting		\$610,991 1.95%	\$362,946 1.16%	\$1,500 0.00%	\$0 0.00%	\$0 0.00%	\$0 0.00%	\$975,337 3.12%
Combined	\$31,294,875	\$6,799,374	\$9,180,470	\$661,525	\$0	\$0	\$0	\$16,641,369

	100.00%	21.73%	29.34%	2.11%	0.00%	0.00%	0.00%	53.18%
	2022 Total Procurement	MBE	WBE	DVBE	LOBTBE	PDBE	Other 8(a)*	Total Supplier Diversity
San Gabriel Valley								
Direct	\$10,513,494	14.30%	\$10,381,724	\$996,129	\$3,044,995	\$0	\$0	\$24,936,342
				1.35%	4.14%	0.00%	0.00%	33.91%
Sub-contracting	\$302,281	0.41%	\$0	\$0	\$0	\$0	\$0	\$302,281
				0.00%	0.00%	0.00%	0.00%	0.41%
Combined	\$73,545,978	100.00%	\$10,815,775	\$996,129	\$3,044,995	\$0	\$0	\$25,238,623
				1.35%	4.14%	0.00%	0.00%	34.32%
	2022 Total Procurement	MBE	WBE	DVBE	LOBTBE	PDBE	Other 8(a)*	Total Supplier Diversity
San Jose Water								
Direct	\$33,633,188	26.08%	\$4,006,036	\$216,170	\$0	\$235,663	\$0	\$38,091,057
				0.17%	0.00%	0.18%	0.00%	29.53%
Sub-contracting	\$2,213,977	1.72%	\$2,530,810	\$3,003,116	\$12,535	\$68,631	\$0	\$7,909,069
				2.39%	0.01%	0.05%	0.00%	6.13%
Combined	\$128,960,386	100.00%	\$35,847,165	\$3,293,286	\$12,535	\$304,294	\$0	\$46,000,126
				2.56%	0.01%	0.24%	0.00%	35.66%
	2022 Total Procurement	MBE	WBE	DVBE	LOBTBE	PDBE	Other 8(a)*	Total Supplier Diversity
Southwest Gas								
Direct	\$11,795,140	11.63%	\$3,978,478	\$37,903,587	\$71	\$0	\$0	\$53,677,276
				37.07%	0.00%	0.00%	0.00%	52.49%
Sub-contracting	\$1,648,063	1.61%	\$268,178	\$291,888	\$7,494	\$4,006,435	\$0	\$6,212,068
				0.29%	0.01%	3.92%	0.00%	6.07%
Combined	\$102,262,219	100.00%	\$13,443,203	\$38,195,475	\$7,565	\$4,006,435	\$0	\$59,889,334
				4.14%	0.01%	3.92%	0.00%	58.56%
	2022 Total Procurement	MBE	WBE	DVBE	LOBTBE	PDBE	Other 8(a)*	Total Supplier Diversity
Suburban Water								
Direct	\$16,297,767	45.72%	\$3,647,253	\$216,207	\$3,934,962	\$0	\$0	\$24,096,189
				0.61%	11.04%	0.00%	0.00%	67.59%
Sub-contracting	\$5,436	0.02%	\$0	\$0	\$0	\$0	\$0	\$5,436
				0.00%	0.00%	0.00%	0.00%	0.02%
Combined	\$35,640,853	100.00%	\$16,303,203	\$216,207	\$3,934,962	\$0	\$0	\$24,101,625
				0.61%	11.04%	0.00%	0.00%	67.61%
	2022 Total Procurement	MBE	WBE	DVBE	LOBTBE	PDBE	Other 8(a)*	Total Supplier Diversity
TelePacific								
Direct	\$279,122	0.26%	\$383,034	\$0	\$16,200	\$0	\$0	\$678,356
				0.00%	0.01%	0.00%	0.00%	0.63%
Sub-contracting	\$0	0.00%	\$0	\$0	\$0	\$0	\$0	\$0
				0.00%	0.00%	0.00%	0.00%	0.00%
Combined	\$108,428,677	100.00%	\$383,034	\$0	\$16,200	\$0	\$0	\$678,356
				0.00%	0.01%	0.00%	0.00%	0.63%
	2022 Total Procurement	MBE	WBE	DVBE	LOBTBE	PDBE	Other 8(a)*	Total Supplier Diversity
Trans Bay Cable								
Direct	\$1,236,783	6.16%	\$67,898	\$230,460	\$0	\$0	\$800	\$1,535,941
				1.15%	0.00%	0.00%	0.00%	7.65%
Sub-contracting	\$39,682	0.20%	\$0	\$0	\$0	\$0	\$0	\$39,682
				0.00%	0.00%	0.00%	0.00%	0.20%
Combined	\$20,872,833	100.00%	\$1,276,465	\$230,460	\$0	\$0	\$800	\$1,575,623
				1.15%	0.00%	0.00%	0.00%	7.85%
	2022 Total Procurement	MBE	WBE	DVBE	LOBTBE	PDBE	Other 8(a)*	Total Supplier Diversity
Wild Goose Storage								
Direct	\$296,459	7.10%	\$159,052	\$5,339	\$0	\$0	\$0	\$460,850
				0.13%	0.00%	0.00%	0.00%	11.03%
Sub-contracting	\$0	0.00%	\$0	\$0	\$0	\$0	\$0	\$0
				0.00%	0.00%	0.00%	0.00%	0.00%
Combined	\$4,177,777	100.00%	\$296,459	\$5,339	\$0	\$0	\$0	\$460,850
				0.13%	0.00%	0.00%	0.00%	11.03%
Total	\$993,524,188	\$178,591,871	\$77,894,459	\$49,916,963	\$8,789,629	\$4,365,460	\$800	\$319,559,182

Table 7a
2023 DVBE Procurement for Large and Small Utilities
(in Dollars and as Percentage of Total Corporate Procurement)

	DVBE Procurement		2023 Total Procurement
Large Utilities			
AT&T	\$49,367,151	0.66%	\$7,500,087,461
Cal Water	\$18,301,423	5.45%	\$336,087,944
Charter	\$6,122,739	0.85%	\$718,445,276
Comcast	\$1,263,929	0.15%	\$822,446,185
Frontier	\$5,483,117	1.40%	\$392,266,258
Lumen	\$16,740,624	2.90%	\$576,486,122
PG&E	\$382,000,101	3.34%	\$11,422,852,965
SDG&E	\$132,744,656	5.12%	\$2,592,245,933
SCE	\$115,890,051	1.97%	\$5,887,087,245
SoCalGas	\$74,434,829	3.22%	\$2,314,943,541
T-Mobile	\$4,744,032	0.07%	\$6,409,641,108
Verizon	\$2,963,998	0.06%	\$4,738,207,052
Total	\$810,056,650	1.85%	\$43,710,797,090
Small Utilities			
Bear Valley Electric	\$0	0.00%	\$33,651,200
Cal-Am Water	\$1,996,647	1.47%	\$136,107,301
Great Oaks	\$0	0.00%	\$7,814,644
Golden State Water	\$1,228,565	0.75%	\$163,885,823
Liberty CalPeco	\$377,896	0.40%	\$94,097,325
Lodi Storage	\$12,941	0.15%	\$8,821,834
PacifiCorp	\$0	0.00%	\$139,915,229
Park & Apple Water	\$414,425	3.65%	\$11,355,956
San Gabriel Valley	\$485,215	0.53%	\$90,698,858
San Jose Water	\$2,678,291	1.72%	\$155,853,952
Southwest Gas	\$34,346,926	33.19%	\$103,487,349
Suburban Water	\$569,632	1.35%	\$42,248,040
TelePacific	\$0	0.00%	\$84,338,716
Trans Bay Cable	72,163	0.00%	\$18,236,639
Wild Goose Storage	\$0	0.00%	\$5,272,050
Total	\$42,110,538	3.84%	\$1,095,784,916
Grand Total	\$852,167,188	1.90%	\$44,806,582,006

Attachment 5-3: Response to TGE-011

SAN GABRIEL VALLEY WATER COMPANY

April 3, 2025

Mehboob Aslam
Water Branch, Cal PA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(by email)

Re: **Response to Data Request No. TGE-011 (Supplier Diversity)**

Dear Mr. Aslam:

In response to your data request dated March 27, 2025, San Gabriel Valley Water Company (San Gabriel or Company) responds as follows:

REQUEST NO. 1:

Please refer the California Public Utilities Commission report “Year 2023 Utilities Procurement of Goods, Services, and Fuel from Women, Minority, Disabled Veteran, LGBT, and Persons with Disabilities Business Enterprises,” published in September 2024.¹ At page 17, the report writes that “San Gabriel Valley Water...did not meet the goal” of achieving the 1.5% goal of supplier procurement for Disabled Veteran Business Enterprises (DVBE).² Please answer the following questions.

- a. Does SGVWC have a viable plan to meet the 1.5% supplier procurement goal for DVBE businesses? Please explain in detail.
- b. On page 50 of the report, Table 2b shows that in 2022, SGVWC had \$996,129 in procurement from DVBE businesses, yielding a procurement rate of 1.35%. On page 48 of the report, Table 2a shows that in 2023, SGVWC had \$485,215 in procurement from DVBE businesses, yielding a procurement rate of 0.53%. Please explain in detail why SGVWC saw a drop in supplier procurement for DVBE businesses from 2022 to 2023.

- c. Please provide SGVWC's 2024 procurement dollar amount and procurement rate percentage for DVBE businesses.
- d. Please provide in a tabulated Excel spreadsheet the following information for SGVWC's DVBE business suppliers for the years 2022 through 2024. Please provide two separate Excel spreadsheets for each division in LAC and Fontana.

Contractor/Business Name	Date of Services	Cost of Service	Reference Number	Account Number		

RESPONSE NO. 1:

- a. San Gabriel will continue to evaluate our procurement spend and refine our strategies to meet and exceed our DVBE goals. We will closely analyze high-spend procurement categories to identify opportunities for qualified DVBE suppliers to provide products and services. Additionally, we will continue to promote the inclusion of DVBEs as subcontractors in large project contracts.

Our efforts will also include expanding our presence at DVBE-focused community events, strengthening partnerships with DVBE-focused Community-Based Organizations, and utilizing the Supplier Clearinghouse database as a key resource for identifying certified DVBE businesses.

- b. In 2022, San Gabriel made a notable one-time transaction of \$339,541 with a DVBE for a specialized project, contributing to the increased DVBE spend in 2022.
- c. In 2024, San Gabriel spent \$1,245,082 with DVBE businesses, accounting for 1.28% of our total procurement spend.
- d. Please see Attachment A.

RESPONDING WITNESSES: Yucelen

Please call me at (626) 448-6183 with any questions regarding this information.

Mehboob Aslam
Response to TGE-011

-3-

April 3, 2025

Sincerely,

/s/ Joel M Reiker

Joel M. Reiker
Vice President, Regulatory Affairs

Cc: Timothy Gee (Timothy.Gee@cpuc.ca.gov)

/encl.

Attachment 5-4: General Order 156 Revised April 2022

R.21-03-010 COM/CR6/jnf

PROPOSED DECISION (Rev. 1)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

RULES GOVERNING THE DEVELOPMENT OF PROGRAMS TO INCREASE PARTICIPATION
OF WOMEN, MINORITY, DISABLED VETERAN, LESBIAN, GAY, BISEXUAL AND
TRANSGENDER (LGBT)' AND PERSONS WITH DISABILITIES BUSINESS ENTERPRISES IN
PROCUREMENT OF CONTRACTS FROM UTILITIES, COMMUNITY CHOICE
AGGREGATORS, AND ELECTRIC SERVICE PROVIDERS, AS REQUIRED BY PUBLIC
UTILITIES CODE SECTIONS 366.2 and 8281-8286

Adopted April 27, 1988. Effective May 30, 1988.
Decision (D.) 88-04-057 in Rulemaking 87-02-026.

Modified by D.88-09-024, D.89-08-041, D.90-11-053, D.90-12-027,
D.92-06-030, D.95-12-045, D.96-12-081, D.98-11-030, D.03-11-
024, D.05-12-023, D.06-08-031, D.11-05-019, D.15-06-007, and
_____. Also modified by Resolution Exec-001 and
Resolution ALJ-377.

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General Order 156 (Current as of _____, 2022)

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1. GENERAL**1.1. Intent****1.1.1. Purpose**

These rules implement California Public Utilities Code (Pub. Util. Code) § 366.2 and §§ 8281-8286, which require the Commission to establish rules for (1) electric utilities, gas utilities, water utilities, wireless telecommunications service providers, telephone utilities, and electric service providers with gross annual California revenues exceeding \$15,000,000 and their Commission-regulated subsidiaries and affiliates and (2) community choice aggregators with gross annual revenues exceeding \$15,000,000 to submit annual plans and reports, excepted as noted below, for purposes of increasing procurement in all categories from business enterprises owned and controlled by women, minority, disabled veteran, and LGBT. Persons with disabilities was added to the Supplier Diversity Program by the Commission. Additionally, pursuant to Pub. Util. Code § 366. 2(m)(1), these rules direct community choice aggregators to submit different information for annual plans, meaning detailed and verifiable annual plans to address increasing procurement from small and local business enterprises. All utilities are referred to herein as “utilities.” Non-utility entities, meaning electric service providers and community choice aggregators, are collectively referred to herein as “other covered entities.”

1.1.2. Scope

The Commission may revise GO 156 on the basis of experience gained in the application and/or changes in legislation.

1.1.3. Relief for Undue Hardship

In cases where these rules result in undue hardship or unreasonable expense to a utility or other covered entity, the utility or other covered entity may request relief from the Commission in accordance with the Commission's Rules of Practice and Procedure. Where the relief requested is minor or temporary in nature, a utility may apply for such relief through an advice letter filing. Any advice letter filing must, at a minimum, be served on the service list of Rulemaking 21-03-010 (or successor proceeding).

1.2. Applicability

To the extent set forth herein, these rules apply to electric utilities, gas utilities, water utilities, wireless telecommunications service providers, telephone utilities, and electric service providers with gross annual California revenues exceeding \$15,000,000 and their commission-regulated subsidiaries and affiliates. To the extent set forth herein, these rules also apply to community choice aggregators with gross annual revenues exceeding \$15,000,000.

1.3. Definitions

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1.3.1. Commission

"Commission" means the California Public Utilities Commission, as provided for in Article XII of the California Constitution.

1.3.2. U.S. Citizens or Legal Alien

Under these rules, persons owning an eligible suppliers must be either U.S. citizens or legal aliens with permanent residence status in the United States.

1.3.3. Women Business Enterprise

"Women business enterprise" means (1) a business enterprise (a) that is at least 51% owned by a woman or women or (b) if a publicly owned business, at least 51% of the stock of which is owned by one or more women, and (2) whose management and daily business operations are controlled by one or more of those individuals.

1.3.4. Minority Business Enterprise

"Minority business enterprise" means (1) a business enterprise (a) that is at least 51% owned by a minority individual or group(s) or (b) if a publicly owned business, at least 51 % of the stock of which is owned by one or more minority groups, and (2) whose management and daily business operations are controlled by one or more of those individuals. The contracting utility or other covered entity shall presume that minority includes, but is not limited to, African Americans, Hispanic Americans, Native Americans, Asian Pacific Americans, and other groups as defined herein.

1.3.5. LGBT Business Enterprise

"LGBT business enterprise" means (1) a business enterprise (a) that is at least 51% owned by a lesbian, gay, bisexual, or transgender person or persons or (b) if a publicly owned business, at least 51% of the stock of which is owned by one or more lesbian, gay, bisexual, or transgender persons; and (2) whose management and daily business operations are controlled by one or more of those individuals.

1.3.6. Persons with Disabilities Business Enterprise

"Persons with disabilities business enterprise" means (1) a business enterprise (a) that is at least 51% owned by a person or persons with a disability or (b) if a publicly owned business, at least 51 % of the stock of which is owned by one or more persons with a disability; and (2) whose management and daily business operations are controlled by one or more of those individuals.

1.3.7. Disabled Veteran

"Disabled veteran" refers to a veteran of the military, naval, or air service of the United States with a service-connected disability who is a resident of the State of California.

1.3.8. Disabled Veteran Business Enterprise

"Disabled veteran business enterprise" is defined in Section 4, herein.

1.3.9. African American Person

"African American person," for purposes of GO 156, refers to a person having origins in

any black racial groups of Africa.

1.3.10. Hispanic American Person

"Hispanic American person," for purposes of GO 156, refers to a person of Mexican, Puerto Rican, Cuban, South or Central American, Caribbean, and other Spanish culture or origin.

1.3.11. Native American Person

"Native American person," for purposes of GO 156, refers to a person having origin in any of the original peoples of North America or the Hawaiian Islands, in particular, American Indians, Eskimos, Aleuts, and Native Hawaiians.

1.3.12. Asian Pacific American Person

"Asian Pacific American person," for purposes of GO 156, refers to a person having origin in Asia or the Indian subcontinent, including, but not limited to, persons from Japan, China, the Philippines, Vietnam, Korea, Samoa, Guam, the U.S. Trust Territories of the Pacific, Northern Marianas, Laos, Cambodia, Taiwan, India, Pakistan, and Bangladesh.

1.3.13. Other Groups and Individuals

"Other groups or individuals" means persons found to be disadvantaged by the U.S. Small Business Administration pursuant to Section 8(a) of the Small Business Act, as amended (15 U.S.C. 637 (a)) or the U.S. Secretary of Commerce, pursuant to Section 5 of Executive Order 11625.

1.3.14. Control

"Control" means exercising the power to make policy decisions.

1.3.15. Operate

To "operate" means to be actively involved in the day-to-day management. It is not enough to merely be an officer or director.

1.3.16. Goal

"Goal" means a target which, when achieved, indicates progress in a preferred direction. A goal is neither a requirement nor a quota.

1.3.17. Excluded Category

"Excluded category" means a category of products or services which may be removed from the dollar base used to establish goals, pursuant to former Section 8.5 of this General Order, because of the established unavailability of eligible suppliers capable of supplying those products or services.

1.3.18. Short-Term Goal

"Short-term goal" means a goal applicable to a period of one (1) year.

1.3.19. Mid-Term Goal

"Mid-term goal" means a goal applicable to a period of three (3) years.

1.3.20. Long-Term Goal

"Long-term goal" means a goal applicable to a period of five (5) years.

1.3.21. Utility

"Utility" means electric utilities, gas utilities, water utilities, wireless telecommunications service providers, and telephone utilities with gross annual California revenues exceeding \$15,000,000 and their Commission-regulated subsidiaries and affiliates.

1.3.22. Clearinghouse

"Clearinghouse" means a Commission-supervised program or entity that shall conduct certifications/verifications and maintain a database of eligible suppliers for the use of utilities and other covered entities under the Commission's Supplier Diversity Program.

1.3.23. Subcontract

"Subcontract" means any agreement or arrangement between a contractor and any party or person (in which the parties do not stand in the relationship of an employer and an employee): (1) For the furnishing of supplies or services for the use of real or personal property, including lease arrangements, which, in whole or in part, is necessary to the performance of any one or more contracts; or (2) Under which any portion of the contractor's obligation under any one or more contracts is performed, undertaken or assumed.

1.3.24. Product and Service Categories

"Product and service categories" means product and service categories as defined by the Standard Industrial Classification (SIC) system maintained by the United States Department of Labor, Occupational Safety and Health Administration, as they currently read or as amended or as defined by any other updated classification system that supersedes the SIC system.

1.3.25. Other Covered Entity

"Other covered entity" means electric service providers and community choice aggregators.

1.3.26. Electric Service Provider

"Electric service provider" means as that term is defined in Pub. Util. Code § 218.3 and used in Pub. Util. Code § 8281-8286.

1.3.27. Community Choice Aggregator

"Community choice aggregator" means (1) an entity created pursuant to Pub. Util. Code §366.2; and (2) with gross annual revenues exceeding \$15,000,000, except when used herein to specifically reference community choice aggregators with gross annual revenues of less than \$15,000,000.

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2. VERIFICATION/CERTIFICATION OF ELIGIBILITY

The following rules shall be used to verify the eligibility of business enterprises owned and controlled by women, minority, LGBT, or persons with disabilities for participation in procurement contracts under the Commission's Supplier Diversity Program. Disabled veterans are addressed in a separate section herein.

2.1. Clearinghouse to Supply Verification Form to Applicant

The Clearinghouse, as described in Section 3, shall supply a verification form to the applicant. An applicant completes the verification form and returns it to the Clearinghouse for processing. Suppliers/applicants that are certified/verified under GO 156 are referred to herein as "eligible suppliers."

2.2. Assessing Suitability of Eligible Supplier to Bid on Procurement Contracts

In assessing the suitability of an eligible supplier to bid for procurement contracts, a utility or other covered entity may require additional information or the completion of additional forms to comply with specific requirements created by the unique character of its business, such as insurance requirements, product and service codes, and bonding limits. A utility or other covered entity may not require additional information to verify that a business is in fact an eligible supplier under the Commission's Supplier Diversity Program.

2.3. Eligible Suppliers Submit Verification Forms Every Three Years

Eligible suppliers shall be required to submit verification forms at least once every three years to the Clearinghouse.

2.4. Completion of Verification Forms

Completion and submission of the verification form to the Clearinghouse serves to initiate a verification of the business as an eligible supplier under the Commission's Supplier Diversity Program. Submission of a verification form does not guarantee verification.

2.5. Endorsement of Ability to Perform

The fact that a business is certified/verified as an eligible supplier under the Commission's Supplier Diversity Program and included in the Clearinghouse's database of eligible suppliers is not an endorsement of its ability to perform and does not guarantee contracts with the utilities or other covered entities.

2.6. Availability of Verification Forms for Inspection

An applicant's verification form shall be available for inspection by the Commission.

2.7. Penalty for Falsification

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Falsification of information by the applicant on the verification form is subject to penalties, as provided in Pub. Util. Code § 8285.

3. CLEARINGHOUSE

The Commission shall provide for a clearinghouse to share the name of and verification status of eligible suppliers under the Commission's Supplier Diversity Program.

(1) The Commission may establish and operate such a clearinghouse internally or authorize, by decision or resolution, a utility-formed entity or arrangement to fund the operation of such a clearinghouse. In authorizing a utility-formed entity or arrangement, the Commission will specify sufficient terms and conditions to specify how verifications and audits shall be performed and to ascertain and ensure that the Clearinghouse is operated in accordance with this General Order, Pub. Util. Code § 366.2, §§ 8281-8286, and other applicable legal requirements.

(2) The purpose of the Clearinghouse shall be to audit and verify the status of business enterprises as eligible suppliers under the Commission's Supplier Diversity Program and to establish and maintain a database of eligible suppliers that is accessible to the Commission, utilities, and other covered entities.

(3) The Clearinghouse auditing and verification program of suppliers shall preclude the need for a utility or other covered entity to audit and verify whether a business enterprise is an eligible supplier under the Commission's Supplier Diversity Program.

(4) The Clearinghouse shall distribute renewal verification forms to the eligible suppliers that are already verified at least once every three years. If the eligible supplier does not complete and return the renewal within a reasonable time, the Clearinghouse shall notify the eligible supplier that the eligible supplier will not be listed as an eligible supplier in the shared database until the renewal is completed and approved.

(5) The Clearinghouse shall post on its website a calendar of procurement-related information sharing and educational events and activities scheduled by utilities and other covered entities in furtherance of legislative policy and this General Order and may post additional information regarding procurement and/or educational opportunities.

(6) In addition to the Clearinghouse, the Commission may approve of third-party agencies to perform verifications of applicants. The Clearinghouse is authorized to accept certifications by approved third-party agencies, as appropriate, and to develop and implement a streamlined comparable agency verification process for any applicant that already has a certification through an approved third-party agency. For purposes of LGBT certification, the Clearinghouse shall establish a streamlined method of certification for entities already certified by a national organization. For purposes of certification of entities owned/controlled by persons with disabilities, the Clearinghouse shall establish a streamlined method of certification for entities already certified by the California Department of General Services or Disability:IN. After the Commission has approved of a third-party agency, applicants may choose between the option of (1) going directly to the Clearinghouse for verification or (2) going through an approved third-party agency, followed by a streamlined verification process with the Clearinghouse. If an applicant already has a certification through an approved third-party agency, the

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applicant is encouraged to apply to the Clearinghouse through the streamlined verification process.

(7) The following shall be the process for a third-party agency seeking to become a verifying agency under this General Order:

- (a) The requesting third-party agency shall submit a written request (herein "Request") to the Commission's GO 156 Staff;
- (b) The Request shall include a detailed explanation showing that the requesting third-party agency's objectives, eligibility requirements, required documentation, and review and certification processes are substantially similar to those of the Clearinghouse;
- (c) The Commission's GO 156 Staff must evaluate the Request and make a recommendation to the Commission within 60 days of receiving a Request;¹ and
- (d) Upon review of the Request by the Commission's GO 156 Staff, the GO 156 Staff will publish a draft resolution under the Commission's Rules of Practice and Procedure granting or denying the requesting third-party agency its verifying agency status. This draft resolution shall be placed on the Commission's Agenda for a vote.

4. DISABLED VETERANS

The following rules shall apply to disabled veteran business enterprises (also referred to as "DVBE"). The term "disabled veteran" is defined in Section 1.3.6 of this General Order.

4.1. Disabled Veteran Business Enterprise

Disabled veteran business enterprise is defined in Military and Veterans Code § 999, as required by D.92-06-030, to mean a business enterprise certified by the California Department of General Services as meeting all of the following requirements.

- (1) It is a sole proprietorship at least 51 percent owned by one or more disabled veterans or, in the case of a publicly owned business, at least 51 percent of its stock is owned by one or more disabled veterans; a subsidiary which is wholly owned by a parent corporation, but only if at least 51 percent of the voting stock of the parent corporation is owned by one or more disabled veterans; or a joint venture in which at least 51 percent of the joint venture's management and control and earnings are held by one or more disabled veterans.
- (2) The management and control of the daily business operations are by one or more disabled veterans. The disabled veterans who exercise management and control are not required to be the same disabled veterans as the owners of the business concern.
- (3) It is a sole proprietorship, corporation, or partnership with its home office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign

¹ See e.g., D.06-08-031 and Resolution Exec.-001 (July 9, 2009).

¹All references to "days" shall be calculated as set forth in Rule 1.15 of the Commission's Rules of Practice and Procedure.

firm, or other foreign-based business.

4.2. Certifying Agency

Pursuant to Pub. Util. Code § 8284(a)(2), DVBEs are verified/certified by the California Department of General Services. The Office of Small Business and Disabled Veterans Business Enterprise Services currently performs this verification/certification. The Clearinghouse shall accept the verifications/certifications by the Department of General Services as though the DVBE has been verified/certified by the Clearinghouse and include such DVBE in the Clearinghouse's database of the verified/certified eligible suppliers.

4.3. Qualifying as a Disabled Veteran Business Enterprise

In order to qualify as a DVBE, a business enterprise must meet the criteria in Section 4.1 and must present a current certificate from the California Department of General Services verifying that such criteria have been met.

5. LESBIAN, GAY, BISEXUAL, AND TRANSGENDER

Pursuant to D.15-06-007, these rules shall apply to LGBT business enterprises (also referred to as "LGBTBEs"). By or before September 1, 2015 and thereafter, the Clearinghouse shall maintain a database associated with the LGBTBEs for purposes of the Commission's Supplier Diversity Program. To the extent permitted by law, utilities and other covered entities shall include LGBT business enterprises in annual reports and annual plans.

6. IMPLEMENTATION

Each utility and other covered entity shall design and implement a program to ensure that eligible suppliers in the Commission's Supplier Diversity Program are encouraged to become eligible suppliers of products and services to the utilities and other covered entities. Nothing in GO 156 authorizes or permits a utility or other covered entity to utilize set-asides, preferences, or quotas in the administration of its program in compliance with GO 156. The utility or other covered entity retains authority to use its legitimate business judgment to select the supplier for a particular contract.

6.1. Internal Program Development and Employee Training

Each utility or other covered entity shall maintain an appropriately sized staff to provide overall direction and guidance and to implement their own program requirements consistent with the Commission's Supplier Diversity Program and applicable law. Each utility and other covered entity shall provide an email address and telephone number on the website of the utility or other covered entity in a prominent location so that eligible suppliers and applicants are able to promptly obtain more information about these internal programs.

Each utility or other entity shall ensure that its staff with procurement responsibilities receive training in the implementation of the Commission's Supplier Diversity Program.

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6.2. External Outreach and Activities

To the extent permitted by law, each utility or other covered entity shall implement an outreach program to inform and recruit eligible suppliers to apply for procurement contracts.

Outreach activities may vary for each utility or other covered entity depending on size, service territory, and specific lines of business. However, each utility or other covered entity shall, at a minimum, and to the extent permitted by law:

- (1) Actively seek out opportunities to identify eligible suppliers under the Commission's Supplier Diversity Program and to expand source pools;
- (2) Actively support the efforts of organizations experienced in the field who promote the interests of eligible suppliers under the Commission's Supplier Diversity Program;
- (3) Work with eligible suppliers under the Commission's Supplier Diversity Program to facilitate contracting relationships by explaining qualification requirements, bid and contracting procedures, materials requirements, invoicing and payment schedules, and other procurement practices and procedures;
- (4) At the request of any unsuccessful bidder, provide information concerning the relative range/ranking of the bid as contrasted with the successful bid. Information on additional selection criteria, such as warranty periods, maintenance costs, and delivery capability, shall be provided when requested if disclosure would not violate the proprietary nature of the specific contract element;
- (5) To the extent possible, make available to eligible suppliers under the Commission's Supplier Diversity Program lists of purchase/contract categories which offer them the best opportunity for success;
- (6) Encourage employees involved in procurement activities to break apart purchases and contracts, as appropriate, to accommodate the capabilities of eligible suppliers under the Commission's Supplier Diversity Program;
- (7) Summarize this General Order in outreach program handouts and electronic notices. Such summaries shall state that eligible suppliers under the Commission's Supplier Diversity will be furnished a complete copy of this General Order upon request; and
- (8) Offer the same assistance set forth in Section 6.2. to any interested person or entity, upon request.

6.3. Subcontracting Program

To the extent permitted by law, each utility or other covered entity shall establish and maintain a subcontracting program for the purpose of encouraging contractors to utilize eligible suppliers as subcontractors.

- (1) The subcontracting program shall serve as an enhancement to, not a replacement for, the utility's or other covered entity's outreach program to eligible suppliers under

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the Commission's Supplier Diversity Program.

(2) The subcontracting program shall apply to the following: (1) Purchases/contracts exceeding \$500,000 for products and services; (2) Construction contracts exceeding \$1,000,000; and (3) Purchases/contracts which offer subcontracting opportunities, regardless of value, where appropriate.

(3) The subcontracting program need not be applied to the procurement of products manufactured for general consumption, such as paper, pens, and the like.

(4) To the extent permitted by law, each utility or other covered entity shall encourage and assist its prime contractors to develop plans to increase the utilization of eligible suppliers under the Commission's Supplier Diversity Program as subcontractors. Prime contractors shall be encouraged to submit to the utility or other covered entity plans that include goals for the utilization of eligible suppliers under the Commission's Supplier Diversity Program as subcontractors. These plans may be incorporated into the contract between the utility or other covered entity and the prime contractor. The prime contractor may submit periodic reports on its compliance with the plan to the utility or other covered entity.

(5) Each utility or other covered entity is encouraged to incorporate in all purchase orders, requests for bid proposals, and other appropriate procurement documents related to procurement efforts subject to the subcontracting program, a statement similar to the following:

**UTILIZATION OF BUSINESS ENTERPRISES OWNED and
CONTROLLED BY WOMEN, MINORITIES, DISABLED
VETERANS, LGBT, AND PERSONS WITH DISABILITIES**

It is the policy of this company that business enterprises owned and controlled by women, minorities, disabled veterans, LGBT, and persons with disabilities (herein "diverse suppliers") shall have the maximum practicable opportunity to participate in the performance of contracts.

However, this policy shall not be used to exclude any qualified businesses from participating in contracting opportunities.

The contractor agrees to use its best efforts to carry out this policy in the award of subcontracts to the fullest extent consistent with the efficient performance of this contract.

The contractor agrees to inform all prospective subcontractors of the opportunity to request from the Clearinghouse a verification application to be certified as a diverse supplier, return the completed application to the Clearinghouse for processing, and, if verified/certified, the prospective supplier will be included in the database, as a diverse supplier.

(6) Each utility or other covered entity is encouraged to inform its prime contractors that the prime contractor's good faith efforts to subcontract with eligible suppliers under the Commission's Supplier Diversity Program is a factor that, to the extent permitted by law, will be considered in the bid evaluation process. A statement to that effect could be included in all appropriate procurement documents.

(7) To the extent permitted by law, each utility or other covered entity shall monitor and include in its annual report to the Commission a summary of progress and efforts by prime contractors to increase the participation of eligible suppliers under the Commission's Supplier Diversity Program.

(8) To the extent permitted by law, each utility or other covered entity shall include in its annual plan to the Commission a description of future plans for encouraging both prime contractors and grantees to engage eligible suppliers under the Commission's Supplier Diversity Program in all procurement categories which provide subcontracting opportunities.

(9) Each utility or other covered entity may include awards to eligible supplier subcontractors in GO 156 reporting results.

7. REVIEW OF CERTIFICATIONS AND DENIALS OF CERTIFICATIONS

This section sets forth the review process for when an applicant seeks (1) a reconsideration of a denial to verify/certify by the Clearinghouse and (2) to file a Notice of Appeal with the Commission after the Clearinghouse confirms its denial. This section also sets forth a process for a third-party to challenge a verification/certification of an eligible supplier by the Clearinghouse.

7.1. Internal Review Process

The review process for a denial of verification/certification by the Clearinghouse includes two steps. First, the applicant may seek internal review from the Clearinghouse. If the Clearinghouse confirms the denial, as the second step, the applicant may seek review of the denial with the Commission by filing a Notice of Appeal under Resolution ALJ-377 (or successor rules) and the processes set forth therein. This resolution is available on the Commission's website. Resolution ALJ-377 sometimes refers to Notice of Appeals as complaints.

The Clearinghouse must implement an efficient internal review process and must promptly provide a copy of confirmation or reversal of the denial to the applicant.

7.2. Notices of Appeal

The Notice of Appeal is filed and docketed as a formal proceeding with the Commission. All docketed matters are accessible on the Commission's website. The Chief Administrative Law Judge shall designate an Administrative Law Judge to hear the Notice of Appeal.

The Administrative Law Judge shall make best efforts to notice the Notice of Appeal for hearing between 10 and 20 days after being assigned to hear the Notice of Appeal. The Administrative Law Judge may confer with parties to determine whether any material facts are in dispute prior to scheduling a hearing and consider whether a hearing is warranted. The Administrative Law Judge may, for good cause shown or upon agreement of the parties, grant a reasonable continuance of the hearing and, instead, schedule and notice the hearing beyond the time period noted above.

A party or jointly the parties may order an expedited transcript of the hearing. Costs may be associated with an order for an expedited transcript, in accordance with the Commission's requirements. In the absence of an expedited transcript, the Commission may address this matter after approximately 8 weeks, the length of time for preparation of a transcript (when no expedited order is placed).

A party may be represented at the hearing by an attorney or other representative.

At the hearing, the applicant carries the burden of proof and shall open and close but the Administrative Law Judge has the discretion to alter the order of presentation. Formal rules of evidence do not apply.

All relevant and reliable evidence may be received in the discretion of the Administrative Law Judge. No deference will be accorded to the underlying denial by the Clearinghouse. The standard of proof is preponderance of evidence.

The Administrative Law Judge shall issue a draft resolution for the Commission's consideration resolving the Notice of Appeal as soon as possible but no later than 30 days after the record of the Notice of Appeal is submitted. The draft resolution will be placed on the Commission's first available agenda, consistent with the Commission's Rules of Practice and Procedure. In the event the transcript of the hearing is not available, the Administrative Law Judge may delay issuing a draft resolution. This timeline would therefore be longer than set forth in Resolution ALJ-377.

From the date the Notice of Appeal is filed and served to and including the date the Commission's final resolution is published, neither party (or an attorney or agent acting on behalf of a party) shall engage in ex parte communications, except for procedural matters. More information about ex parte communications is available in the Commission's Rules of Practice and Procedure.

7.3. Third-Party Challenges

A third-party may challenge the certification/verification by the Clearinghouse of an applicant/eligible supplier under the Supplier Diversity Program whether the certification/verification is pending or completed. Third-party challenges must comply with all the following: (1) be in writing and sent to the Clearinghouse; (2) set forth with specificity the grounds for the challenge in ordinary and concise language; (3) include the name and address of the third-party; and (4) be served on the affected applicant or eligible supplier on the same day sent to the Clearinghouse. Such challenges may include supporting documentation.

The Clearinghouse will review third-party challenges to determine whether a factual basis for the questioning exists.

If the Clearinghouse determines insufficient factual basis for the challenge exists, it shall act as follows: (a) inform the third-party and subject applicant or eligible supplier of this determination in writing within 20 business days of the receipt of the challenge and (b) inform the third-party of the right to file a Notice of Appeal to the Commission. Resolution ALJ-377(or successor rules) sets forth the process for filing the Notice of Appeal. Additional procedures related to Notices of Appeal are set forth herein.

If the Clearinghouse determines that sufficient factual basis for the challenge exists, the

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Clearinghouse shall require the applicant/eligible supplier to provide the Clearinghouse with any additional information needed to permit further evaluation of the verification/certification of the applicant/eligible supplier. Following the Clearinghouse's review and evaluation of the information presented by both the third-party and the applicant/eligible supplier, the Clearinghouse will propose a resolution and provide for an opportunity to respond to the Clearinghouse's proposed resolution. Then the Clearinghouse shall notify the third-party and the applicant or eligible supplier of its final verification decision and of the right to file a Notice of Appeal of this determination with the Commission pursuant to Resolution ALJ-377 (or successor rules) and the processes set forth herein.

During the pendency of a third-party challenge of a business enterprise already verified/certified by the Clearinghouse, the business enterprise will remain certified/verified.

If a third-party challenge does not include the minimum criteria set forth above or it withdraws its challenge, the Clearinghouse may continue its review to determine whether the challenge merits consideration.

7.4. Contract Disputes

Disputes regarding general contract-related matters, such as failure to win a contract award, must be brought before the appropriate court or other forum. The Commission's jurisdiction on contract related matters is limited. Some disputes or complaints regarding the Commission's GO 156 Supplier Diversity Program, such as complaints about non-compliance with GO 156, may fall under the complaint process set forth in the Commission's Rules of Practice and Procedure. The Notice of Appeal, described herein, is also available.

8. GOALS

Each utility and other covered entity shall set substantial and verifiable short-term (one year), mid-term (three years), and long-term (five years) goals for the utilization of eligible suppliers under the Commission's Supplier Diversity Program. Goals shall be set annually for each major product and service category which provides opportunities for procurement. "Substantial and verifiable Goals" mean goals which are realistic and clearly demonstrate a commitment to encourage the participation of eligible suppliers in contracts. Section 8 applies to community choice aggregators and electric service providers that are public entities to the extent permitted by law.

8.1. Setting Goals

The utilities and other covered entities shall consider the following factors in setting goals: (1) Total utility or other covered entity purchasing and/or contracting projections; (2) Availability of eligible suppliers under the Commission's Supplier Diversity Program and competitiveness in the geographical area served by the utility or other entity; (3) Market dynamics based on historical data and trends; and; (4) Other appropriate factors which may increase the share of business for eligible suppliers under the Commission's Supplier Diversity Program.

8.2. Initial Minimum Goals

Each utility and other covered entity shall establish minimum long-term procurement goals for each major category of products and services purchased from eligible suppliers of not less than the following: 15% for minority business enterprises; 5% for women business enterprises; 1.5% for disabled veteran business enterprises; and 0.5% for 2022, 1.0% for 2023, and 1.5% for 2024 and beyond for LGBT business enterprises. No procurement goal has been adopted for persons with disabilities business enterprises. Contracts or purchases with eligible suppliers under the Commission's Supplier Diversity Program may only count toward one procurement goal. For example, a minority and women business enterprises may be counted toward one goal, either the minority business enterprise goal or the women business enterprise goal but not both.

8.3. Parity

The specification of initial long-term procurement goals shall not prevent the utilities or other covered entities from seeking to reach parity with those public agencies and other companies, which the Legislature states in Pub. Util. Code § 8281(b)(1)(B) are awarding 30% or more of their contracts to women, minority, disabled veteran, and LGBT business enterprises.

8.4. Other Goals

Procurement goals shall also be established for both minority women business enterprises and non-minority women business enterprises. These goals are intended to ensure that utilities and other covered entities do not direct procurement programs toward non-minority women business enterprises and minority men business enterprises to the detriment or exclusion of minority women business enterprises.

8.5. Subsets of Goals

Procurement goals shall be set for each major category of products or services. Goals need not be set for products or services which fall within an "excluded category" pursuant to former Section 8.5.²

8.6. Setting of Goals by Major Category of Products/ Services

For each major category of products and services where the minimum long-term procurement goals required by Section 8.2. are not met, the utility or other covered entity shall include a comprehensive discussion of all efforts made to find or recruit eligible suppliers of products or services. The utility and other covered entity may also explain in detail in its annual report how its ability to meet its procurement goals are affected because eligible suppliers capable of supplying certain products and services are unavailable or because sole source procurement is the only

² In D.03-11-024, the Commission revised GO 156 and modified Section 8.7. Prior to D.03-11-024, Section 8.5 provided: A utility may create an "excluded category" of products or services where it is clearly evident that WMDVBEs do not provide a specific product or service, or that sole source procurement is the only available procurement method. The utility shall bear the burden of demonstrating the unavailability of WMDVBEs capable of supplying such products or services. Because there may in the future be WMDVBEs capable of supplying products or services in an excluded category, the utility must justify in its annual report the continued existence of its excluded category. Excluded categories must be noted in the utility's annual report to the Commission on WMDVBE program progress and future plans.

available procurement method. As part of this explanation, the utility and other covered entity may also include data with exclusions pursuant to former Section 8.5. If such data is necessary to more fully explain why it has not been able to eliminate exclusions, provided that the utility or other covered entities report must contain the data without exclusions in the first sentence.

8.7. Excluded Category of Products/Services

A utility or other covered entity which is presently purchasing products or services from affiliates may subtract the dollars paid to affiliates for these products or services from the total dollars used as the basis for establishing procurement goals for purchases from eligible suppliers of these categories of products or services, provided that the utility or other covered entity encourages the affiliate to establish an appropriate subcontracting program where such affiliate employs subcontractors. Any utility or other covered entity which takes advantage of this section must in its annual report to the Commission state whether the affiliates have established a subcontracting program and describe the results of any such program. The utility or other covered entities annual plan must describe any future plans to encourage such a sub-contracting program. This section applies only to those utilities which are purchasing products or services from affiliates as of the effective date of the General Order adopted on May 30, 1988.

8.8. Procurement Goals Expressed

Procurement goals for each specific product or service category shall be expressed as a percentage of total dollars awarded by a utility and other covered entity to outside suppliers in that category; however, where appropriate, non-numeric goals may also be included.

8.9. Specific Product/Services Goals Expressed

Overall program procurement goals shall be expressed as a percentage of total dollars awarded to outside suppliers in all categories of products and services purchased by a utility or other covered entity other than products and services which are included in a fuel procurement base established pursuant to Section 8.11.

8.10. Method of Expressing Program Goals

Payments to other utilities and franchise tax fees, other taxes and postage need not be included in the standard procurement base used to establish procurement goals.

8.11. Payments

Each utility and other covered entity may establish a separate fuel procurement base for reporting progress and establishing goals for procurement of fuels from eligible suppliers under the Commission's Supplier Diversity Program. Utilities or other covered entities choosing to report fuel purchases separately from the purchase of other products and services must follow the guidelines set forth below: (1) Fuel used to power vehicles, heat utility facilities, and supply emergency generators may not be included in the fuel procurement base. Such fuel must be included in the standard procurement base used to establish goals, unless the fuel is purchased from another utility and thus subject to the exclusion authorized herein; (2) The fuel procurement base must, at a minimum, include all purchases of natural gas from domestic on-shore natural gas

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markets; (3) A utility or other covered entity which purchases eligible supplier's fuels other than domestic onshore natural gas must include such purchases in the fuel procurement base because Section 8.7. of this amended General Order does not permit utilities or other covered entities to exclude product and services categories for which there are available eligible suppliers; and (4) A utility or other covered entity may exclude purchases of fuel other than domestic onshore natural gas if such fuel qualifies for an exclusion under former Section 8.5. and if the utility or other covered entity plans for and reports on progress in increasing the procurement of such fuels from eligible suppliers.

8.12. Low Utilization

Each utility and other covered entity shall make special efforts to increase utilization and encourage entry into the marketplace of eligible suppliers in product or service categories where there has been low utilization of eligible suppliers, such as legal and financial services, fuel procurement, and areas that are considered technical.

8.13. No Penalty

No penalty shall be imposed for failure of any utility or other covered entity to meet or exceed procurement goals.

8.14. Report of Procurement Goals

Utilities and other covered entities shall report their procurement goals in their annual plans.

9. ANNUAL REPORT

Utilities and other covered entities shall provide an electronic copy of their Annual Report to the Commission's Executive Director on or before March 1 of each year. The Annual Report must provide details on the utilities' or other covered entities' programs created to comply with the Commission's Supplier Diversity Program. Section 9 does not apply to utilities and electric service providers with gross annual California revenues of \$15 million or less or community choice aggregators with gross annual revenues of \$15 million or less. Entities added to the Commission's Supplier Diversity Program by Senate Bill 255 (2019), e.g., certain community choice aggregators, electric service providers, and utilities, shall submit their first annual reports in March 2023. Annual reports shall include data on person with disabilities business enterprises starting March 2024.

9.1. Contents of Report

The Annual Report shall contain at least the following elements:

- (1) A description of program activities engaged in during the previous calendar year. This description shall include both internal and external activities, and include the approximate amount of funding, to the extent available, directly expended on development and distribution of technical assistance to small and diverse businesses.
- (2) A summary of purchases and/or contracts, with breakdowns by ethnicity, product and service categories compared with total contract dollars awarded to outside suppliers in those categories, and with information regarding the total number of

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contracts, and the dollars awarded to eligible suppliers under the Commission's Supplier Diversity Program. Each utility or other covered entity shall report the number of eligible suppliers under the Commission's Supplier Diversity Program who have the majority of their workforce working in California, to the extent such information is readily accessible. Each utility or other covered entity shall also report the number of eligible suppliers under the Commission's Supplier Diversity Program that received direct spend during the reporting year.

(3) An itemization of program expenses provided in the format approved by Commission staff, as guided by Attachment A to D.95-12-045, D.15-06-007, and other relevant decisions.

(4) A description of progress in meeting or exceeding set procurement goals and an explanation of any circumstances that may have resulted in not meeting those goals. This subsection may not apply to community choice aggregators and electric service providers that are public agencies.

(5) A summary of prime contractor utilization of eligible subcontractors suppliers under the Commission's Supplier Diversity Program.

(6) A list of complaints received from eligible suppliers in the past year, accompanied by a brief description of the nature of each complaint and its resolution or current status. For purposes of this subsection, a *complaint* means any written or verbal statement from an eligible supplier or third-party that the utility's or other covered entity's program is unsatisfactory or unacceptable.

(7) A description of any efforts made to recruit eligible suppliers for products or services in procurement categories where utilization has been low, such as legal and financial services, fuel procurement, and areas that are considered technical. This subsection may not apply to community choice aggregators and electric service providers that are public agencies.

(8) Utilities and other covered entities shall retain all documents and data they rely on in preparing their annual reports for the longer of either three years or in conformance with the document retention policies of the utility or other covered entity. The utility or other covered entity shall provide these documents and data to the Commission, upon request.

(9) The utilities and other covered entities shall summarize purchases and/or contracts from eligible suppliers under the Commission's Supplier Diversity Program in product and service categories that include energy storage systems, vegetation management, renewable and non-renewable energy, wireless communications, broadband, smart grid, rail projects and electronic procurement, in addition to their current reporting categories. Utilities have discretion to segregate overlapped dollars. Utilities and other covered entities shall report renewable and nonrenewable energy procurement in a manner similar to their reporting of fuel procurement.

(10) The Commission's staff may conduct as many audits of utilities and other covered entities as it deems necessary but shall audit at least one annual GO 156 report randomly selected every two years from a different utility industry to confirm that the reported spend is accurate. The Commission's staff may determine the selection process

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for this random selection and the audit methodology. The Commission's staff may conduct audits of any reports or data provided to the Commission by utilities and other covered entities regarding their participation in the Supplier Diversity Program.

(11) Each utility or other covered entity which elects to report fuel procurement separately must file with the Commission's Executive Director on or before March 1 of each year a separate detailed and verifiable report on participation in fuel markets by eligible suppliers under the Commission's Supplier Diversity Program. These reports must include, at a minimum, the results of purchases in each fuel category.

- (a) Each utility or other covered entity shall report purchases by:
 - (1) Market origin and fuel type;
 - (2) Volume and dollar magnitude;
 - (3) Term of sale, e.g., spot, intermediate, long term; and
 - (4) Ethnicity and gender of the supplier.
- (b) Each utility and other covered entity shall provide:
 - (1) An explanation of how existing and/or changing market conditions are affecting the utility's or other covered entity's ability to meet or exceed its procurement goals for fuel (this subsection may not apply to community choice aggregators and electric service providers that are public agencies as laws may prohibit such procurement goals);
 - (2) A comprehensive description of the specific out-reach programs used to seek eligible supplier fuel suppliers in each market in which fuel is purchased (this subsection may not apply to community choice aggregators and electric service providers that are also public agencies as laws may prohibit such procurement goals); and
 - (3) A justification for any exclusion of a specific fuel category from the utility's or other covered entity's fuel procurement base.

9.2. Erosion of Internal Programs

This General Order is not intended to permit erosion of programs and reporting presently engaged in by a utility or other covered entity.

9.3. Further Breakdown of Reporting Authorized

Nothing in this General Order shall prohibit any utility or other covered entity from breaking down specific categories further than presently required (for example, reporting contracts awarded to Filipino Americans separately from those awarded to Asian Pacific Americans, or reporting male and female results within minority business enterprise classifications).

10. ANNUAL PLAN

The utilities and other covered entities shall provide an electronic copy of their Annual Plan to the Commission's Executive Director on or before March 1 of each year, that

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includes a detailed and verifiable plan for encouraging procurement in all categories of eligible suppliers under the Commission's Supplier Diversity Program. Section 10 does not apply to utilities and electric service providers with gross annual California revenues between \$15 million and \$25 million. Section 10.1. does not apply to community choice aggregators or electric service providers that are also public agencies. Pursuant to Pub. Util. Code § 366.2(m)(1) and Section 10.2. below, the Annual Plans of community choice aggregators shall include a detailed and verifiable plan for increasing procurement from small, local, and diverse business enterprises in all categories, including, but not limited to, renewable energy, energy storage system, and smart grid projects. Entities added to the Commission's Supplier Diversity Program by Senate Bill 255 (2019), e.g., certain community choice aggregators, electric service providers, and utilities, shall submit their first annual plan in March 2023. Annual plans shall include, to the extent permitted by law, person with disabilities business enterprises starting in March 2024.

10.1. Utilities and Other Covered Entities:

The Annual Plan shall contain at least the following elements:

- (1) Short-term, mid-term, and long-term procurement goals, as required by Section 8, herein;
- (2) A description of program activities planned for the next calendar year. This description shall include both internal and external activities;
- (3) A plan for recruiting eligible suppliers of those products or services where utilization has been low, such as legal and financial services, fuel procurement, and areas that are considered technical .
Plans for recruiting Eligible Suppliers in any "excluded category"
- (4) A plan for seeking and or cultivating eligible suppliers of those products and services where eligible suppliers are currently unavailable.
- (5) Plans for encouraging prime contractors and grantees to engage eligible suppliers
A plan for encouraging both prime contractors and grantees to engage eligible suppliers in subcontracts in all categories which provide subcontracting opportunities.
- (6) A plan for complying with the program guidelines established by the Commission, as required by Pub. Util. Code § 8283(c). The Executive Director's Office will be responsible for developing, periodically refining, and recommending such guidelines for the Commission's adoption in an appropriate procedural forum.

10.2. Community Choice Aggregators and Electric Service Providers that are Public Agencies

As set forth in Section 11, below, for community choice aggregators and electric service providers that are also public agencies, the annual plan shall contain at least the following elements: descriptions of program activities to increase procurement related to small, local, and diverse business enterprises planned for the next year in all categories, including, but not limited to, renewable energy, energy storage systems, and smart grid projects.

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**11. ANNUAL PLANS FOR COMMUNITY CHOICE
AGGREGATORS AND ELECTRIC SERVICE PROVIDERS
THAT ARE PUBLIC AGENCIES**

As set forth in Rulemaking 21-03-010, community choice aggregators and electric service providers shall comply with similar annual plan requirements as utilities and other covered entities, except that these annual plan requirements may be modified to reflect limitations in the law applicable to public agencies, as well as the fact that, at this time, energy procurement represents the majority of expenses for a typical community choice aggregator and electric service providers. In addition, for community choice aggregators these annual plans are limited by statute to increasing procurement from small, local, and diverse business enterprises. Staff will meet with community choice aggregators, electric service providers that are also public agencies, and stakeholders to develop the annual plan requirements, as needed. Staff will provide a copy of any revised reporting requirements to community choice aggregators, electric service providers, stakeholders, and the service list of this proceeding (or successor proceeding related to GO 156). To the extent permitted by law, these annual plan requirements must continue to promote the state policy of increasing contracts with (1) eligible suppliers and (2) small, local, and diverse business enterprises. Community choice aggregators and electric service providers shall submit their first annual plan in March 2023.

**12. ANNUAL FORMS FOR SMALLER UTILITIES AND
SMALLER ELECTRIC SERVICE PROVIDERS**

Pursuant to Pub. Util. Code § 8283(f), this section sets forth the rules that apply to smaller utilities and smaller electric service providers that fall within the Commission's Supplier Diversity Program pursuant to statute, i.e., those with gross annual California revenues between \$15 million and \$25 million. These smaller utilities and smaller electric service providers shall annually, on or before March 1, electronically submit a "simplified form" to the Commission's Executive Director. The information to be included in the form shall be developed by the Commission's staff together with these smaller utilities and smaller electric service providers, as set forth in Rulemaking 21-03-010. The Commission's staff will provide a copy of this simplified form via email to the service list of Rulemaking 21-03-010 (or the successor proceeding). The reporting requirements in Section 9 and Section 10 do not necessarily apply to these smaller utilities and smaller electric service providers. These smaller utilities and smaller electric service providers shall submit their first annual "simplified form" in March 2023.

13. COMMISSION ANNUAL REPORT TO LEGISLATURE

As required by Pub. Util. Code § 8283(e), the Commission shall provide an annual report to the Legislature (beginning January 1989) on the progress of activities undertaken by each utility or other covered entity to implement Pub. Util. Code § 366.2 and §§ 8281-8286 and this General Order.

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In this annual report to the Legislature, the Commission shall recommend a program for carrying out the policy declared in the above-mentioned sections of the Pub. Util. Code, together with recommendations for any legislation it deems necessary or desirable to further that policy.

This annual report to the Legislature shall include recommendations to the utilities and other covered entities for the achievement of maximum results in implementing legislative policy and this General Order.

This annual report to the Legislature shall include information initially identified in Resolution Exec-001, which provides for monitoring and evaluation of the Supplier Clearinghouse "on a periodic basis." As part of this monitoring and evaluation of the Supplier Clearinghouse, the Commission's annual report to the Legislature will include an analysis of the existing contract between the Clearinghouse and the utilities (e.g., audits of revenues and expenditures associated with the certification program), as required by Resolution Exec-001.

14. WORKFORCE DIVERSITY AND BOARD DIVERSITY REPORTING

All utilities and other covered entities will include information regarding current reporting in other jurisdictions on workforce diversity and board diversity in annual reports, starting March 2023. The Commission's staff will develop further reporting requirement during a phase 2 of Rulemaking 21-03-010. The Commission's staff will provide the reporting requirements to the service list of Rulemaking 21-03-010 (or successor proceeding) and place the requirements on the Commission's webpage for GO 156.

15. VOLUNTARY COMPLIANCE AND REPORTING

The Commission supports all efforts to voluntarily comply with the state policy of increasing procurement from diverse suppliers set forth in Pub. Util. Code §§ 8281-8286.

Pub. Util. Code § 366.2(m)(3) encourages community choice aggregators with gross annual revenues under \$15 million to adopt a plan for increasing procurement from small, local, and diverse business enterprises in all categories.

Pub. Util. Code § 8283(e)(1) encourages certain small utilities and electric service providers, i.e., those with gross annual California revenues under \$15 million, to adopt a plan for increasing women, minority, disabled veteran, and LGBT business enterprise procurement.

Pub. Util. Code § 8283(e)(2) encourages exempt wholesale generators, distributed energy resource contractors, and energy storage system companies to adopt a plan for increasing women, minority, disabled veteran, and LGBT business enterprise procurement and to voluntarily report activity in this area to the Legislature on an annual basis. Cable television corporations and direct broadcast satellite providers were previously included in Pub. Util. Code § 8283(e)(2).

16. COMMISSION ANNUAL *EN BANC* MEETING

The Commission shall hold an annual *en banc* hearing or other proceeding to provide all stakeholders, such as utilities, other covered entities, members of the public, community-based organizations, and eligible suppliers under the Commission's Supplier Diversity Program the opportunity to share ideas and make recommendations for effectively implementing legislative policy under Pub. Util. Code § 366.2 and §§ 8281-8286 and this General Order. The Commission's staff shall provide notice of the annual *en banc* broadly, including to the service list for the most recent proceeding pertaining to General Order 156 and any service lists pertaining to related topics. Notice shall also appear on the Commission's Daily Calendar.

Approved and dated _____, at San Francisco, California.

PUBLIC UTILITIES COMMISSION STATE OF CALIFORNIA

By _____ *Rachel Peterson, Commission's
Executive Director*