

Docket	:	<u>A.25-07-003</u>
Exhibit Number	:	<u>Cal Adv - #</u>
Commissioner	:	<u>Matthew Baker</u>
Administrative Law Judge	:	<u>Rafael L. Lirag</u>
Public Advocates Office	:	
Witness(es)	:	<u>Ama Serwaa</u>



**PUBLIC ADVOCATES OFFICE**  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**

**PUBLIC**

**REPORT & RECCOMENDATIONS ON  
CUSTOMER SERVICE, ENVIRONMENTAL  
SOCIAL JUSTICE & ACTION PLAN, WATER  
QUALITY, SPECIAL REQUEST 10 AND 11**

California American Water Company's  
General Rate Case Application 25-07-003  
Test Year 2027

San Francisco, California  
January 23, 2026

# TABLE OF CONTENTS

1	<b>MEMORANDUM.....</b>	<b>IV</b>
2	<b>CHAPTER 1 – CUSTOMER SERVICE .....</b>	<b>1</b>
3	<b>I. INTRODUCTION .....</b>	<b>1</b>
4	<b>II. SUMMARY OF RECOMMENDATIONS .....</b>	<b>1</b>
5	<b>III. ANALYSIS.....</b>	<b>1</b>
6	A. GO 103-A Compliance.....	1
7	B. Customer Contacts Received by CPUC’s Consumer Affairs	
8	Branch .....	5
9	C. Customer Complaints Received by CAB.....	6
10	D. Cal Am’s Safety Program .....	7
11	<b>IV. CONCLUSION.....</b>	<b>8</b>
12	<b>CHAPTER 2 - ENVIRONMENTAL AND SOCIAL JUSTICE ACTION</b>	
13	<b>PLAN.....</b>	<b>9</b>
14	<b>I. INTRODUCTION .....</b>	<b>9</b>
15	<b>II. SUMMARY OF RECOMMENDATIONS .....</b>	<b>9</b>
16	<b>III. ANALYSIS.....</b>	<b>10</b>
17	A. CAL Am’s Disadvantaged Communities.....	10
18	B. ESJ Goal 1 .....	12
19	C. ESJ Goal 2 .....	13
20	D. ESJ Goal 3 .....	13
21	E. ESJ Goal 4 .....	14

1	F.	ESJ Goal 5 .....	14
2	G.	ESJ Goal 6 .....	15
3	H.	ESJ Goal 7 .....	15
4	I.	ESJ Goal 8 .....	15
5	J.	ESJ Goal 9 .....	16
6	<b>IV.</b>	<b>CONCLUSION .....</b>	<b>16</b>
7		<b>CHAPTER 3 – WATER QUALITY .....</b>	<b>17</b>
8	<b>I.</b>	<b>INTRODUCTION .....</b>	<b>17</b>
9	<b>II.</b>	<b>SUMMARY OF RECOMMENDATIONS .....</b>	<b>17</b>
10	<b>III.</b>	<b>ANALYSIS .....</b>	<b>17</b>
11	A.	Violations & Notifications Since the Last GRC (2023).....	17
12	B.	Water Treatment.....	18
13	<b>IV.</b>	<b>CONCLUSION .....</b>	<b>18</b>
14		<b>CHAPTER 4 – SPECIAL REQUEST 10 MONTEREY RATES WEBPAGE .....</b>	<b>19</b>
15	<b>I.</b>	<b>INTRODUCTION .....</b>	<b>19</b>
16	<b>II.</b>	<b>SUMMARY OF RECOMMENDATIONS .....</b>	<b>19</b>
17	<b>III.</b>	<b>ANALYSIS .....</b>	<b>19</b>
18	<b>IV.</b>	<b>CONCLUSION .....</b>	<b>22</b>
19		<b>CHAPTER 5 – SPECIAL REQUEST 11: MULTI FAMILY LOW INCOME</b>	
20		<b>PILOT PROGRAM EXTENSION AND EXPANSION .....</b>	<b>23</b>
21	<b>I.</b>	<b>INTRODUCTION .....</b>	<b>23</b>
22	<b>II.</b>	<b>SUMMARY OF RECOMMENDATIONS .....</b>	<b>23</b>
23	<b>III.</b>	<b>ANALYSIS .....</b>	<b>23</b>

1	A.	Component 1: The Multi Family Assistance Pilot Program	
2		(MAPP) .....	24
3	B.	Component 4: Water Energy Retrofit Program for Multi-	
4		Family Mobile Homes.....	25
5	<b>IV.</b>	<b>CONCLUSION .....</b>	<b>26</b>
6		<b>ATTACHMENTS .....</b>	<b>A-1</b>



## MEMORANDUM

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) examined application material, data request responses, and other information presented by California American Water Company (Cal Am) in Application (A.) 25-07-003 to provide the California Public Utilities Commission (Commission or CPUC) with recommendations in the interests of ratepayers for safe and reliable service at the lowest cost. Mr. Brian Yu is Cal Advocates' project lead for this proceeding. This Report is prepared by Ama Serwaa. Mr. Mukunda Dawadi is the oversight supervisor. Mr. Niki Bawa and Ms. Ritta Merza are the legal counsel.

Although every effort was made to comprehensively review, analyze, and provide the Commission with recommendations on each ratemaking and policy aspect presented in the Application, the absence of any particular issue from Cal Advocates' testimony connotes neither agreement nor disagreement with the underlying request, methodology, or policy position related to that issue.

Chapter #	Description	Witness
1	Customer Service	Ama Serwaa
2	Environmental Social Justice & Action Plan	Ama Serwaa
3	Water Quality	Ama Serwaa
4	Special Request 10	Ama Serwaa
5	Special Request 11	Ama Serwaa

## **CHAPTER 1 – CUSTOMER SERVICE**

### **I. INTRODUCTION**

This chapter addresses Cal Am’s failure to meet customer service performance standards over the past five years.

### **II. SUMMARY OF RECOMMENDATIONS**

To ensure Cal Am provides adequate customer service and complies with the Commission’s General Order (GO) 103-A standards, the Commission should:

1. Reduce Cal Am’s executive compensation expense account by 16% due to Cal Am’s failure to meet customer service performance standards over the past five years. This would result in a \$59,231.68 reduction of the proposed \$370,198 budget for the Test Year (TY).
2. Require Cal Am to bring its call answer performance into compliance with GO 103-A standards before its next rate case.
3. Require Cal Am to bring its bill rendering performance measure into compliance with GO 103-A standards before its next rate case.
4. Find Cal Am’s safety program sufficient and in compliance with the American Water Infrastructure Act (AWIA).

### **III. ANALYSIS**

#### **A. GO 103-A Compliance**

GO 103-A requires annual reporting performance on customer service quality standards. Cal Am has failed to meet all the customer service standards set forth in Appendix E of GO 103-A. Table 1-1 below provides an overview of Cal Am’s customer service performance.

**Table 1-1: Cal Am's Customer Service Performance (2020 – 2024)**

	Goal	2020	2021	2022	2023	2024
<b>Telephone Performance</b>						
# of Calls reaching a utility rep/ within 30 seconds	-	49,524	19,219	28,110	50,702	66,326
# of attempts to reach a utility rep/	-	125,209	115,746	111,272	103,183	94,185
Call Answer Measure	80% or more	40%	17%	25%	49%	70%
Number of Calls Abandoned	-	21,091	32,649	26,271	11,815	4,325
Abandoned Call Rate Measure	5% or less	17%	28%	24%	11%	5%
<b>Billing Performance</b>						
Bill Rendering	99% or more	97%	98%	97%	98%	980%
Bill Accuracy	3.0% or less	0.8%	0.4%	0.5%	0.4%	0.3%
Payment Posting Error	1.0% or less	0.27%	0.34%	0.28%	0.16%	0.15%
<b>Meter Reading Performance</b>						
Meter Reading Performance Standard	3% or less	1%	2%	2%	3%	4%
<b>Work Order Completion</b>						
Scheduled Appointments Performance	5% or less	1%	1%	1%	1%	1%
# Customer Requested Scheduled Orders Missed	5% or less	2%	2%	3%	2%	3%
<b>Response to Customer &amp; Regulatory Complaints Performance</b>						
Total # of Connections/Customers	-	179,192	183,333	186,321	187,184	189,382
# Of Complaints to Utility from CAB	-	47	33	31	48	31
% Of Complaints to Utility from CAB	0.1% or less	0.03%	0.02%	0.02%	0.03%	0.02%

Cal Am fails to comply with GO 103-A standards in three areas: 1) the call answer performance standard for years 2020, 2021, 2022, 2023 and 2024, 2) the abandoned call rate performance standard for years 2020, 2021, 2022, and 2023 and 3) the bill rendering performance standard for 2020, 2021, 2022, 2023, and 2024. Cal Am also failed its meter reading performance standard for 2024.

The Commission requires utilities to answer at least 80% of phone calls within 30 seconds during normal business hours. GO 103-A explains that the call answer rate is measured by dividing the number of calls reaching a utility representative within 30 seconds by the number of attempts to reach a utility

1 representative.<sup>1</sup> GO 103-A sets the call answer standard at 80% or above and  
2 further defines any performance under 60% as substantially out of compliance.<sup>2</sup>

3 Cal Am failed to meet call answer performance standards for the last five  
4 years. Cal Am's call answer rate was 40% in 2020, 17% in 2021, 25% in 2022,  
5 49% in 2023, and 70% in 2024.<sup>3</sup> In other words, in four of the last five years, Cal  
6 Am answered less than half its customer phone calls within the required 30  
7 seconds. Cal Am's current call answer rate as of October 31, 2025, sits at 79%.<sup>4</sup>  
8 Cal Am's failure to meet customer service standards by such wide margins is  
9 concerning and should not continue.

10 Secondly, Cal Am's abandoned call rate performance is measured by  
11 dividing the number of calls abandoned by the number of attempts to reach a  
12 utility representative.<sup>5</sup> Cal Am did not meet the minimum standard of 5% or lower  
13 for 2020, 2021, 2022, and 2023. Cal Am's abandoned call rate performance  
14 measure was 17% for 2020, 28% for 2021, 24% for 2022, and 11% for 2023.<sup>6</sup>  
15 The Commission should require Cal Am to develop and implement a plan to bring  
16 its abandoned call rate into compliance with GO 103-A standards before its next  
17 rate case.

18 Third, Cal Am failed its meter reading performance standard for 2024 but  
19 passed for 2020, 2021, 2022, and 2023. Cal Am's meter reading performance

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<sup>1</sup> GO 103-A, Appendix E at 1.

<sup>2</sup> GO 103-A, Appendix E at 1.

<sup>3</sup> Attachment 1-2: Customer Service Responses, Cal Am's Response to Cal Advocates' Data Request SRA-001, Question 1.

<sup>4</sup> Attachment 1-2: Customer Service Responses, Cal Am's Response to Cal Advocates' Data Request SRA-001, Question 1.

<sup>5</sup> GO 103-A, Appendix E at 1.

<sup>6</sup> Attachment 1-2: Customer Service Responses, Cal Am's Response to Cal Advocates' Data Request SRA-001, Question 1.

1 (meters not read) measure was 4% in 2024 whereas the standard calls for less than  
2 or equal to 3.0%.<sup>7</sup>

3 Fourth, Cal Am’s ability to render bills is measured by dividing the number  
4 of bills not rendered within seven calendar days to the total number of bills  
5 scheduled to be rendered.<sup>8</sup> Cal Am has not been consistent in rendering bills  
6 within seven calendar days to customers. The bill rendering performance measure  
7 must be greater than or equal to 99%. Cal Am’s bill rendering performance (bills  
8 not rendered in seven days) in 2020 was 97% in 2020, 98% in 2021, 97% in 2022,  
9 98% in 2023, 98% in 2024. The Commission should require Cal Am to develop  
10 and implement a plan to bring its bill rendering performance into compliance with  
11 GO 103-A standards before its next general rate case.

12 GO 103-A states, “consumers expect and should receive service that is  
13 consistently adequate, reliable, and in compliance with applicable water quality  
14 standards”.<sup>9</sup> Cal Am failed to meet GO 103-A standards for abandoned call rate  
15 for the years 2020, 2021, 2022, and 2023.

16 Cal Am’s troubling trend of declining customer service performance over  
17 the years is problematic for ratepayers. During the last GRC, Cal Am consistently  
18 failed two out of the ten metrics: 1) abandoned call rate during normal business,  
19 and 2) the percentage of bills rendered (mailed) within seven calendar days of the  
20 scheduled billing date (percentage of bills rendered within 7 days).<sup>10</sup> Not only are

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<sup>7</sup> Attachment 1-2: Customer Service Responses, Cal Am’s Response to Cal Advocates’ Data Request SRA-001, Question 1. and GO 103-A, Appendix E at 4.

<sup>8</sup> GO 103-A, Appendix E at 1.

<sup>9</sup> GO 103-A, Appendix E at 1.

<sup>10</sup> Attachment 1-3: A.22-07-001, *Application of California-American Water Company (U210w) to Increase Revenues in Each of its Districts Statewide*, Cal Advocates Testimony of Isaac Gendler, Report on Depreciation, Earthquake Insurance, Customer Service, Wildfire, and Safety. (Excerpt)



1 the call answered performance and the abandoned call rate significantly worse in  
2 this GRC, but a third category, bill rendering, is now also out of compliance.

3 Cal Am's declining customer service standards indicate poor performance  
4 in serving its customers. However, Cal Am requests that customers bear the  
5 additional cost of paying its executives and other employees' performance-related  
6 compensation in addition to their regular salaries. Given that Cal Am has been  
7 failing customer service performance standards since its last GRC, the  
8 Commission should reduce ratepayer funding of Cal Am's single executive  
9 employee salary <sup>11</sup> for TY 2027 by \$59,231.68 from Cal Am's forecasted  
10 amount.<sup>12</sup> The reduction is a 16% decrease corresponding to the number of GO  
11 103 standards that Cal Am failed to achieve. The Commission should also require  
12 Cal Am to develop and implement a plan to bring Cal Am into compliance with all  
13 GO 103-A customer service standards before its next rate case.

#### 14 **B. Customer Contacts Received by CPUC's Consumer Affairs** 15 **Branch**

16 Cal Advocates reviewed multiple sources to assess Cal Am's customer  
17 service performance, including Cal Am's application workpapers, Cal Am's  
18 responses to Cal Advocates' data requests, and data obtained from the  
19 Commission's Consumer Affairs Branch (CAB). CAB is responsible for assisting  
20 consumers with their questions and informally resolving disputes with their utility  
21 service providers. As part of the current GRC, Cal Advocates examined CAB's  
22 data on contacts from Cal Am's customers during the past five years (2020 – 2024  
23 and partially 2025). CAB categorizes customer contacts into five types. Table 1-2

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<sup>11</sup> Attachment 1-4: Customer Service Responses, Cal Am's Response to Cal Advocates' Data Request SLM-04, Question 2,

<sup>12</sup> RO Model file "ALL\_CH04\_O&M\_WP\_Labor," tab: "Current Employees WS-A-1," cell Y26.

below summarizes Cal Am’s customer contacts with CAB by each type from 2020 through 2025.

**Table 1-2: Contacts Received by CAB from Cal Am Customers Annually<sup>13</sup>**

Types of Contacts	2020	2021	2022	2023	2024	2025
Complaint	9	2	8	1	1	2
Informal Complaint	54	22	30	49	34	17
Phone Contact	41	42	65	66	95	39
Inquiry	N/A	1	N/A	1	N/A	N/A
Misdirected	2	2	N/A	6	N/A	1
Total Contacts	106	69	103	123	131	60

#### **C. Customer Complaints Received by CAB**

GO 103-A, Appendix E, Section 5, defines the standard for customer and regulatory complaints. It is calculated by the number of complaints reported annually to the utility by CAB, divided by the total number of customers. The standard must be less than or equal to 0.1%.<sup>14</sup> For complaints requiring utility investigation and response through the resolution process, CAB sends regulated utilities a subset of the complaints shown in Table 1-3 below. Cal Am’s customer complaint resolution performance was 0.03% for 2020, 0.02% for 2021, 0.02% for 2022, 0.03% for 2023, 0.02% for 2024, and 0.12% for 2025. Thus, Cal Am has met its performance measure under GO 103-A in the past 5 years.

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<sup>13</sup> Attachment 1-2: “Standard Disclosures for CAB Data” CPUC Consumer Service and Information Division, revised 5/12/2025.

<sup>14</sup> GO 103-A, Appendix E at 5.

**Table 1-3: Cal Am’s GO 103-A Response to Regulatory Complaints Performance Standard**

	2020	2021	2022	2023	2024	2025
<b>No. of Complaints Reported to utility by CAB</b>	47	33	31	48	31	220
<b>No. of Customers</b>	179,192	183,333	186,321	187,184	189,382	189,179
<b>No. of Complaints as % of No. of Customers</b>	0.03%	0.02%	0.02%	0.03%	0.02%	0.12%
<b>GO 103-A Compliance Status (&lt; 0.1%)</b>	Compliant	Compliant	Compliant	Compliant	Compliant	Non-Compliant

**D. Cal Am’s Safety Program**

The Commission should find Cal Am’s safety program to be sufficient. Cal Am has an Emergency Response Plan (ERP) in place for the Hillview District, San Diego County, Larkfield District, Los Angeles County District, Meadowbrook District, Monterey County District, Sacramento District, and Ventura County District.<sup>15</sup> The ERP is available to all employees and can be shared with outside agencies.

Cal Advocates also reviewed Cal Am’s compliance with the American Water Infrastructure Act of 2018 (AWIA), which requires Cal Am to provide proof that it has submitted a Risk and Resilience Assessment Certification (RRAC) to the United States Environmental Protection Agency (EPA) for systems

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<sup>15</sup> Attachment 1-2: Customer Service Responses, Cal Am’s Response to Cal Advocates’ Data Request SRA-001, Question 8.



1 serving more than 3,300 people. Cal Am submitted a RRAC for Coronado, East  
2 Pasadena, Arden, Baldwin Hills, Duarte, Fruitridge, Hillview Oakhurst,  
3 Meadowbrook, and West Placer systems.<sup>16</sup> Cal Am is currently reviewing and  
4 updating the RRAC for Lincoln Oaks, Monterey Parkway, San Marino, Suburban,  
5 and Thousand Oaks systems.<sup>17</sup>

#### IV. CONCLUSION

6 The Commission should find that Cal Am did not meet the performance standards  
7 under GO 103-A, Appendix E, Section 1.(A) (Call Answering Service Level) for 2020,  
8 2021, 2022, 2023, and 2024, and is failing for 2025. The Commission should also find  
9 that Cal Am did not meet the performance standards under GO 103-A, Appendix E,  
10 Section 1.(B) (Abandoned Call Rate) for years 2020, 2021, 2022, and 2023. Finally, the  
11 Commission should find that Cal Am did not meet performance standards under GO 103-  
12 A Section 2.(A) (Bill Rendering) for 2020, 2021, 2022, 2023, 2024, and is failing for  
13 2025<sup>18</sup>. The Commission should require Cal Am to develop and implement a plan to  
14 bring Cal Am into compliance with all GO 103-A customer service standards. The  
15 Commission should also reduce ratepayer funding of executive compensation for Cal  
16 Am's failure to comply with GO 103-A standards, by reducing Cal Am's single executive  
17 employee forecasted budget by 16%, a reduction of \$59,231.68 from the proposed  
18 \$370,198 budget for the Test year.

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<sup>16</sup> Attachment 1-2: Cal Am's Response to Cal Advocates' Data Request SRA-01, Question 7.

<sup>17</sup> Attachment 1-2: Cal Am's Response to Cal Advocates' Data Request SRA-04, Question 3.

<sup>18</sup> Data based on Cal Advocates' analysis as of September 2025

## CHAPTER 2 - ENVIRONMENTAL AND SOCIAL JUSTICE ACTION PLAN

### I. INTRODUCTION

1 This chapter discusses the Assigned Commissioners Scoping Memo and Ruling.<sup>19</sup>  
2 Specifically, this chapter will discuss whether there will be impacts on Environmental  
3 and Social Justice (ESJ) communities resulting from the application goals of the  
4 Commission's ESJ Action Plan and any other issues related to Cal Am's ability to furnish  
5 and maintain safe, efficient, and reliable water service.

### II. SUMMARY OF RECOMMENDATIONS

6 The Commission Should:

- 7 1. Require Cal Am to meet ESJ goal 1; to consistently integrate equity and  
8 access considerations throughout Commission regulatory activities.
- 9 2. Require Cal Am's to meet ESJ Goal 2; to increase investment in clean  
10 energy resources to benefit ESJ communities, especially to improve local  
11 air quality and public health.
- 12 3. Accept Cal Am's claims of meeting ESJ goal 3; to improve access to high  
13 quality water, communication and transportation services for ESJ  
14 communities.
- 15 4. Require Cal Am to meet ESJ goal 4; to increase climate resiliency in ESJ  
16 communities.
- 17 5. Accept Cal Am's claim of meeting ESJ goal 5; to enhance outreach and  
18 public participation opportunities for ESJ communities to meaningfully  
19 participate in the Commission's decision-making process and benefit from  
20 Commission programs.
- 21 6. Require Cal Am to meet ESJ goal 6; to enhance enforcement to ensure  
22 safety and consumer protection for all, especially for ESJ communities.
- 23 7. Require Cal Am to meet ESJ goal 7; to promote high road career paths and  
24 economic opportunities for residents of ESJ communities.

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<sup>19</sup> Attachment 2-1, Assigned Commissioners Scoping Memo and Ruling, Application 25-07-003.

8. Require Cal Am to meet ESJ goal 8; to improve training and staff development related to environmental and social justice issues within the Commission’s jurisdiction.
9. Require Cal Am to meet ESJ goal 9; to monitor the Commission’s Environmental and Social Justice efforts to evaluate how they are achieving their objectives.

### III. ANALYSIS

Environmental justice is the fair treatment of people of all races, cultures, and incomes concerning the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies<sup>20</sup>. Cal Advocates inquired regarding the nine goals of the Commission’s ESJ Action Plan that Cal Am claims to meet. Cal Advocates also assessed Cal Am’s programs and progress related to the Commission’s ESJ Action Plan, as well as Cal Am’s involvement in disadvantaged communities within its service areas.

#### A. CAL Am’s Disadvantaged Communities

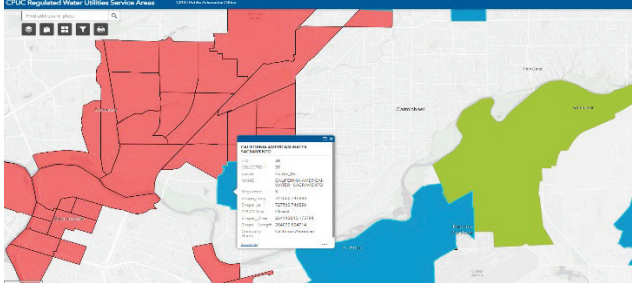
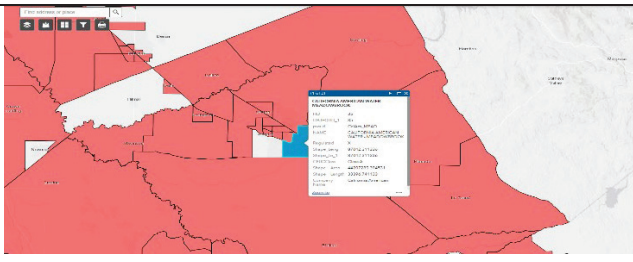
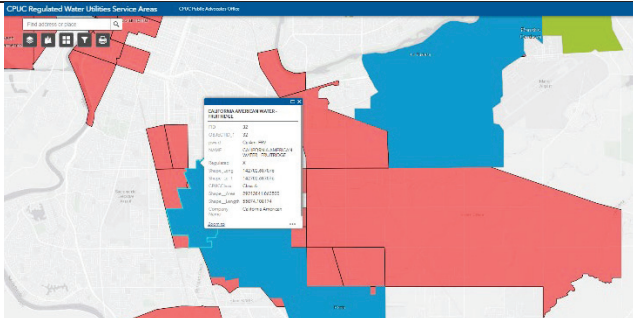
Per the Commission’s ESJ Action Plan, the Commission encourages utilities to invest in ESJ and disadvantaged communities (DAC’s) more broadly. A disadvantaged community is defined as census tracts that score in the top 25% of the California Communities Environmental Health Screening Tool (CalEnviroScreen 4.0), along with those receiving the highest 5% of CalEnviroScreen 4.0’s pollution burden score.<sup>21</sup> Cal Am’s disadvantaged communities are in Sacramento, San Diego, Meadowbrook, Fruitridge, Bellflower, Duarte, and San Marino. The maps of the discussed regions are shown in Table 2-1 below.

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<sup>20</sup> Environmental & Social Justice Action Plan, Version 2.0, California Public Utilities Commission, April 7, 2022 (ESJ Action Plan Version 2), available at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf>

<sup>21</sup> ESJ Action Plan Version 2 at 2.

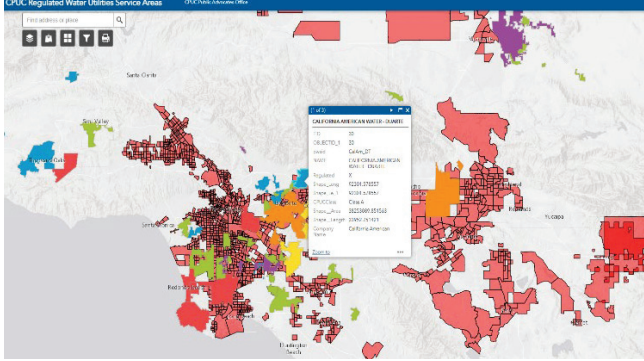
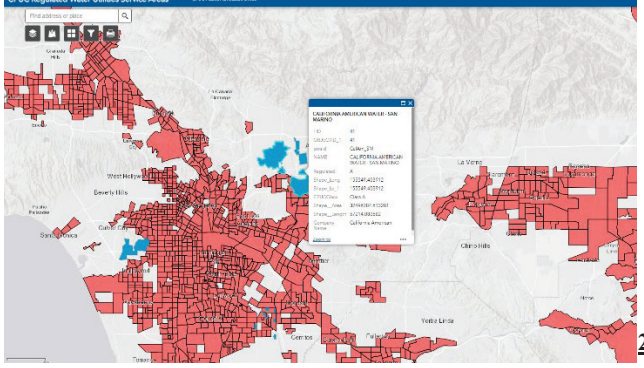
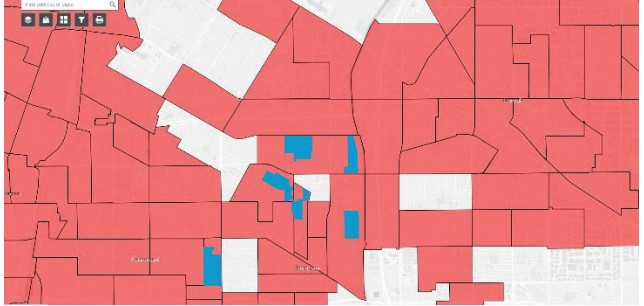
**Table 2-1: Cam Am Disadvantaged Communities**

1. Sacramento:	 <p><b>CPUC Regulated Water Utilities Service Areas</b></p> <p>22</p>
2. Meadowbrook:	 <p><b>CPUC Regulated Water Utilities Service Areas</b></p> <p>23</p>
3. Fruitridge:	 <p><b>CPUC Regulated Water Utilities Service Areas</b></p> <p>24</p>

<sup>22</sup> CPUC Regulated Water Utilities Service Areas, California Public Utilities Commission, available at: <https://capuc.maps.arcgis.com/>

<sup>23</sup> CPUC Regulated Water Utilities Service Areas, California Public Utilities Commission, available at: <https://capuc.maps.arcgis.com/>

<sup>24</sup> CPUC Regulated Water Utilities Service Areas, California Public Utilities Commission, available at: <https://capuc.maps.arcgis.com/>

<p>4. Duarte:</p>	 <p>25</p>
<p>5. San Marino:</p>	 <p>26</p>
<p>6. Bellflower:</p>	

## B. ESJ Goal 1

The ESJ Goal 1 is to consistently integrate equity and access. Cal Am states Goal 1 is a “CPUC goal”.<sup>27</sup> The Commission should require Cal Am not only to

<sup>25</sup> CPUC Regulated Water Utilities Service Areas, California Public Utilities Commission, available at: <https://capuc.maps.arcgis.com/>

<sup>26</sup> CPUC Regulated Water Utilities Service Areas, California Public Utilities Commission, available at: <https://capuc.maps.arcgis.com/>

<sup>27</sup> Attachment 2-3: Cal Am’s Response to Cal Advocates’ Data Request SRA-02, Question 1.

1 “support many initiatives and programs aimed at helping underrepresented  
2 communities,”<sup>28</sup> but also meet the Commission’s ESJ goal 1 in its disadvantaged  
3 communities.

#### 4 **C. ESJ Goal 2**

5 ESJ Goal 2 is to increase investment in clean energy resources to benefit  
6 ESJ communities, especially to improve local air quality and public health. Cal  
7 Am claims the company proposes several clean energy projects, including battery  
8 storage and energy regeneration.<sup>29</sup> However, projects discussed fail to impact  
9 disadvantaged communities in Cal Am’s service areas of Bellflower, San Marino,  
10 Duarte, Fruitridge, Meadowbrook, and Sacramento. Cal Am’s recent projects to  
11 meet ESJ goal 2 have been situated in the Hillview District, Ventura, and  
12 American Oaks pump stations. The Commission should require Cal Am to meet  
13 ESJ goal 2 by improving conditions in its disadvantaged communities.

#### 14 **D. ESJ Goal 3**

15 ESJ Goal 3 strives to improve access to high-quality water,  
16 communications, and transportation services for ESJ communities. Cal Am offers  
17 various customer service assistance programs, including the Multi-Family Low  
18 Income Pilot and the Customer Assistance Program for ESJ Communities. These  
19 programs include bill discounts, direct install programs, and bill payment  
20 assistance. Cal Am meets ESJ goal 3.

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<sup>28</sup> Attachment 2-3, Cal Am’s Response to Cal Advocates’ Data Request SRA-02, Question 1.

<sup>29</sup> Attachment 2-3, Cal Am’s Response to Cal Advocates’ Data Request SRA-02, Question 1.



1           **E. ESJ Goal 4**

2           ESJ Goal 4 is to increase climate resiliency in ESJ communities. Cal Am  
3           claims to ultimately meet ESJ goal 4, as its basis is energy-focused<sup>30</sup>. Cal Am  
4           currently does not meet ESJ goal 4, but hopes to propose projects that may reduce  
5           environmental vulnerabilities in ESJ communities. The Commission should  
6           monitor Cal Am to ensure it meets ESJ goal 4 in its disadvantaged communities.

7           **F. ESJ Goal 5**

8           ESJ Goal 5 is to enhance outreach and public participation opportunities for  
9           ESJ communities to meaningfully participate in the Commission’s decision-  
10          making process and benefit from the Commission’s programs. The Commission  
11          should accept Cal Am’s claims that it supports ESJ goal 5 to enhance outreach and  
12          public participation opportunities for ESJ communities to meaningfully participate  
13          in the Commission’s decision-making process and benefit from the Commission’s  
14          programs.<sup>31</sup> As shown on Table 2-1 above, Cal Am currently has 6 areas located  
15          in Cal EnviroScreen’ SB 535 disadvantaged communities<sup>32</sup>. Cal Am’s Multi-  
16          Family Pilot program and its extension seek to continually enhance outreach to  
17          eligible Customer Assistance Program (CAP) participants. Cal Am’s Multi-Family  
18          Pilot Program provides discounts to water users in low-income multi-family  
19          housing, while also delivering benefits to low-income renters in multi-family  
20          buildings that do not pay a water bill directly. After completing Component 4  
21          pilot, an extension of the Multi-family Pilot Program, Cal Am states it will seek to

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<sup>30</sup> Attachment 2-3, Cal Am’s Response to Cal Advocates’ Data Request SRA-02, Question 1.

<sup>31</sup> Attachment 2-3, Cal Am’s Response to Cal Advocates’ Data Request SRA-02, Question 1.

<sup>32</sup> See, California Climate Investments to Benefit Disadvantaged Communities, SB 535 Disadvantaged Communities, State of California OEHHA, available at: <https://oehha.ca.gov/calenviroscreen/sb535> that states “Disadvantaged communities in California are specifically targeted for investment of proceeds from the state’s Cap-and-Trade Program. These investments are aimed at improving public health, quality of life and economic opportunity in California’s most burdened communities, and at the same time, reducing pollution that causes climate change.”

1 incorporate more robust programs that directly expand to serve all low-income  
2 communities, especially those in Cal Am’s disadvantaged communities such as  
3 Sacramento, Meadowbrook, Fruitridge, Duarte, San Marino, and Bellflower.

#### 4 **G. ESJ Goal 6**

5 ESJ Goal 6 is to enhance enforcement to ensure safety and consumer  
6 protection for all, especially for ESJ communities. Cal Am claims ESJ goal 6 is a  
7 “CPUC goal, not utility goal”<sup>33</sup>. Cal Am fails to meet ESJ goal 6, as they lack  
8 projects and programs meant to enhance enforcement to ensure safety and  
9 consumer protection for all, especially in ESJ communities, as required by the  
10 Commission. The Commission should require Cal Am to actively incorporate  
11 programs that enhance enforcement to ensure safety and consumer protection for  
12 all, especially in its disadvantaged communities, to meet ESJ goal 6.

#### 13 **H. ESJ Goal 7**

14 ESJ Goal 7 is to promote high road career paths and economic  
15 opportunities for residents of ESJ communities. Cal Am fails to meet ESJ goal 7  
16 by claiming that it is a “CPUC goal, not a utility goal”<sup>34</sup>. The Commission should  
17 require Cal Am to meet ESJ goal 7 in its disadvantaged communities.

#### 18 **I. ESJ Goal 8**

19 ESJ Goal 8 improves training and staff development related to  
20 environmental and social justice issues within the Commission’s jurisdictions. Cal  
21 Am fails to meet ESJ goal 8, claiming it is a CPUC goal and not theirs.<sup>35</sup> The

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<sup>33</sup> Attachment 2-3, Cal Am’s Response to Cal Advocates’ Data Request SRA-02, Question 1.

<sup>34</sup> Attachment 2-3, Cal Am’s Response to Cal Advocates’ Data Request SRA-02, Question 1.

<sup>35</sup> Attachment 2-3, Cal Am’s Response to Cal Advocates’ Data Request SRA-02, Question 1.



1 Commission should require Cal Am to meet ESJ goal eight in all its disadvantaged  
2 communities.

### 3 **J. ESJ Goal 9**

4 ESJ Goal 9 seeks to monitor the Commission’s environmental and social  
5 justice efforts to evaluate how they are achieving their objectives. Cal Am fails to  
6 meet the ESJ goal nine. Cal Am claims the ESJ goal nine is the CPUC target, not a  
7 utility goal. <sup>36</sup> The Commission should require Cal Am to make efforts to meet  
8 ESJ goal 9 within its disadvantaged communities.

## **IV. CONCLUSION**

9 Cal Am currently meets two of the nine ESJ goals: goals 3 and 5. Cal Am asserts  
10 that the remaining seven goals fall within the responsibility of the Commission’s goals  
11 and are not utility goals. It is important for the Commission to require Cal Am to actively  
12 pursue progress towards all ESJ goals, particularly in disadvantaged communities.

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<sup>36</sup> Attachment 2-3, Cal Am’s Response to Cal Advocates’ Data Request SRA-02, Question 1.

## **CHAPTER 3 – WATER QUALITY**

### **I. INTRODUCTION**

Cal Advocates did not identify any issues in this GRC related to Cal Am’s water quality.

### **II. SUMMARY OF RECOMMENDATIONS**

The Commission should find Cal Advocates did not find any violations or water quality issues with Cal Am’s water system.

### **III. ANALYSIS**

Cal Am has six districts. The San Diego County District, The Los Angeles County District, The Larkfield District, The Monterey County District, the Sacramento District, and the Ventura County District. Cal Am has had various instances of non-compliance with Maximum Contaminant Levels (MCL) within districts, but has since remedied each notification with corrective actions since the last GRC.

#### **A. Violations & Notifications Since the Last GRC (2023)**

Within the San Diego County District, the Coronado system had an E.coli-positive repeat sample following a total coliform-positive routine sample. Treatment was completed, and the system’s water quality was brought into compliance on November 30, 2023. The Los Angeles County District system hasn’t had any instance of when MCLs or action levels were exceeded. The Larkfield district has had no instances when MCLs or action levels were exceeded for this GRC. The Monterey County District has had no instances of non-compliance with MCLs or action levels. The Sacramento District has had zero instances of non-compliance with MCLs or action levels in this GRC. Lastly, the Ventura County District has had no instances when MCLs or action levels were exceeded.

1           **B. Water Treatment**

2           The San Diego system's instance of non-compliance with MCLs has been  
3           remediated since the last GRC. Cal Am completed corrective actions by installing  
4           dedicated sample stations to improve reliability for bacteriological monitoring.  
5           Regarding the Monterey system, Cal Am claims that no additional treatment was  
6           needed, as the average detections were within the upper limit levels specified in  
7           Table 64449-B of Title 22 of the California Code of Regulations.<sup>37</sup>

IV.    **CONCLUSION**

8           The Commission should find that Cal Advocates did not find water quality issues  
9           in this GRC.

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<sup>37</sup> Attachment 3-1: CAW 2025 GRC Final Application, Exhibit B, Minimum Data Requirements, Vol.2 of 3 at 5.

1                   **CHAPTER 4 – SPECIAL REQUEST 10 MONTEREY RATES**  
2                   **WEBPAGE**

3                   **I.       INTRODUCTION**

4                   This chapter addresses Cal Am’s Special Request #10 and recommends updating  
5                   the Monterey Rates Webpage.

6                   **II.       SUMMARY OF RECOMMENDATIONS**

7                   The Commission should deny Cal Am’s request to deactivate the Monterey Rates  
8                   webpage. Instead, the Commission should require Cal Am to incorporate the “How to  
9                   Read Your California American Water Bill” webpage with the Monterey Rates webpage.

10                  **III.       ANALYSIS**

11                  In compliance with D.18-07-010, Cal Am built and has maintained the Monterey  
12                  Rates webpage<sup>38</sup> through 2025 to address supply, conservation, rationing, financial  
13                  stability, and rate design issues in the Monterey County District. Initially, the creation of  
14                  the Monterey Rates webpage was to inform Monterey customers of the rate design  
15                  changes authorized in the proceeding. The Monterey Rates webpage provided Cal Am  
16                  customers with information about the Modified Cost Balancing Account (MCBA). The  
17                  site has also provided customers with knowledge of the Water Revenue Adjustment  
18                  Mechanism (WRAM), presenting a one-stop shop experience for customers with an  
19                  adequate explanation of the principles that guide the rate design changes. Cal Am now  
20                  claims that customers have access to updated, more comprehensive statewide resources.  
21                  This new resource is the “How to Read Your California American Water Bill”<sup>39</sup>

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<sup>38</sup> Monterey Rates, California American Water, available at: <https://www.amwater.com/caaw/newrates>  
[accessed on December 31, 2025]

<sup>39</sup> How to Read Your Water Bill, California American Water, available at:  
<https://www.amwater.com/caaw/resources/PDF/Customer-Service-Billing/california-americanwater-howtoreadyourbill-CAW.pdf> [accessed on December 31, 2025]

webpage. According to Cal Am, this replacement page will explain rate components and surcharges using a sample bill, an interactive bill calculator that allows customers to estimate their bills based on service area, meter size, and usage.<sup>40</sup> Cal Am claims the “How to Read Your California American Water Bill” webpage covers the same topics as the Monterey Rates webpage and that customers can now access statewide tools for accurate, and current billing information. Cal Advocates compared both sites and lists the differences in Table 4-1.

**Table 4-1: Monterey Rates Page Vs. “How to Read Your California American” Water Bill**

Feature	“Monterey Rates Page”	“How to Read Your Bill” PDF
Explains rate tiers	Yes	No
Local district-specific info (e.g., Monterey)	Yes	No
Explains surcharges (e.g., WRAM/MCBA, ACAM)	Yes	Generic
CPUC decisions, rate cases	Yes	No
Interpreting your personal bill layout	No	Yes
Shows sample bill with line-item breakdown	No	Yes
Interactive tools/bill calculator links	Yes	No
Updated/web-based	Yes	Sometimes

When Cal Advocates inquired whether both pages contain the same information, Cal Am stated that the “How to Read Your California American Water Bill” webpage and the interactive calculator providing tariff schedules, rates, rate design, components of

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<sup>40</sup> Attachment 4-2: Direct Testimony of Jonathan Morse at 17.

1 rates, ratemaking mechanisms, and surcharges applicable to customers were present.<sup>41</sup>  
2 Cal Am also provided the webpage references of the statewide resources that provide  
3 information on various rate making mechanisms, such as the Central Division Rate  
4 Schedules<sup>42</sup> and other statewide rate schedules.

5 However, a closer analysis of the comparison between the Monterey Rates  
6 webpage and the “How to Read Your California American Water Bill” webpage shows  
7 that the Monterey Rates webpage provides a narrative explanation of how the rates are  
8 determined. For example, it describes the rate-design goals (tiered pricing, conservation  
9 signals, etc.) and ratemaking mechanisms such as the “Annual Consumption Adjustment  
10 Mechanism (ACAM)” and the “WRAM/MCBA”<sup>43</sup> surcharge. The Monterey Rates  
11 webpage also shows actual numbers (for single family, multifamily, nonresidential)  
12 showing the rates per tier, service charges by meter size, etc. The Monterey Rates page is  
13 more informative than the former, which is more limited.

14 The “How to Read Your American Water Bill” webpage shows a sample bill  
15 layout, with sections labeled (account summary, service-related charges, taxes, meter  
16 read summary) so you can see exactly where each line in your bill comes from. The  
17 “How to Read Your California American Water Bill” webpage describes each line item  
18 (e.g., “Water Service Charge,” “Water Usage Charge,” “WRAM/MCBA Surcharge,”  
19 “Purchased Water Surcharge,” etc.) and what triggers them. For someone trying to  
20 understand both, how their bill is computed and what drives rate changes over time, the  
21 “How to Read your California American Water Bill” webpage is useful but generic and  
22 lacks the information the Monterey rates webpage provides. Though it explains how to

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<sup>41</sup> Attachment 4-1: Cal Am’s Response to Cal Advocates’ Data Request SRA-03, Question 3.a.

<sup>42</sup> Central Division, California American Water, available at: <https://www.amwater.com/caaw/Customer-Service-Billing/Water-Rates/Monterey-District> [accessed on December 31, 2025]

<sup>43</sup> Modified Cost Balancing Account (MCBA).

1 interpret a bill for a Cal Am customer, it does not allow the ratepayer to understand how  
2 the charges are calculated and presented.

#### IV. CONCLUSION

3 The Monterey Rates webpage is more valuable as a one-stop starting point than  
4 the How to Read Your California American Bill webpage. The Monterey Rates page  
5 explains rate design and regulatory mechanisms and links to tools such as the calculator  
6 and “how to read your bill” worksheet. The “How to Read Your California American  
7 Water Bill” webpage, on the other hand, describes each line item (e.g., “Water Service  
8 Charge,” “Water Usage Charge,” “WRAM/MCBA Surcharge,” “Purchased Water  
9 Surcharge,” etc.) and what triggers a ratepayer’s rate. Therefore, the Commission should  
10 deny Cal Am’s request to deactivate the Monterey Rates page. Rather, the Commission  
11 should require Cal Am to incorporate both pages into one, allowing the ratepayer to have  
12 access to information on both the Monterey Rates webpage and the “How to Read Your  
13 California American” webpage.

1                   **CHAPTER 5 – SPECIAL REQUEST 11: MULTI FAMILY LOW**  
2                   **INCOME PILOT PROGRAM EXTENSION AND EXPANSION**

3                   **I.       INTRODUCTION**

4                   This chapter presents the analysis and recommendations regarding Special  
5                   Request 11, The Multi-Family Low Income Pilot Program Extension and Expansion. Cal  
6                   Am requests the extension of both pilots through 2028, beyond the initial 2025 rate case  
7                   review date outlined in Resolution W-5241 to all eligible multi-family properties in the  
8                   San Diego and Monterey Service areas.

9                   **II.       SUMMARY OF RECOMMENDATIONS**

- 10                  1.     The Commission should allow Cal Am’s request to extend the two  
11                  multifamily Low Income Pilot programs, components 1 and 4 in the San  
12                  Diego district.  
13                  2.     The Commission should allow Cal Am’s request to expand component 1 of  
14                  the pilot, the Multifamily Assistance Program (MAPP), to its Monterey  
15                  service area.

16                  **III.       ANALYSIS**

17                  Resolution W-5241 was the Commission’s approval for two Low-income Multi-  
18                  family pilots, referred to as Component 1 and Component 4, of a total of four different  
19                  Company proposed pilots.<sup>44</sup> Cal Am designed this pilot with a budget of \$200,000 to  
20                  primarily reach master-metered San Diego customers focusing on providing equitable,  
21                  cost-effective services to help master-metered customers. In the initial campaign, 51  
22                  eligible mobile home parks were identified and targeted. Of the 51 eligible, only 17  
23                  participated in the initial campaign. During the subsequent three quarterly payment  
24                  campaigns, participation increased to 24. Cal Am claims to have encountered multiple  
25                  challenges of eligible participants in its Imperial Beach area with the hope that the Multi-

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<sup>44</sup> Direct Testimony of Patrick Pilz at 7.



1 Family low-income pilot will serve as a case study on how to resolve the long-standing  
2 challenge of providing benefits to tenants in master metered settings.

3 Cal Am's Low- Income Multi-Family Pilots address a longstanding equity issue  
4 for low-income tenants in master-metered buildings who are often excluded from  
5 assistance. Cal Am claims they experienced challenges with outreach efforts to garner  
6 participants. To remedy the challenge, Cal Am has hired a small local marketing firm  
7 specialized in customer assistance programs that has helped with San Diego Gas &  
8 Electric's CARE program enrollment to market the MAPP program to eligible tenants  
9 either through direct phone calls, site visits or etc.<sup>45</sup> Cal Am hopes this effort will provide  
10 meaningful increase in participation of which they intend to use for the Monterey  
11 expansion (Component 4) after implementation of this general rate case proceeding in  
12 2027 or later.<sup>46</sup>

13 The Commission should approve Cal Am's request for expansion to Component 4  
14 but with strict conditions contingent on the publication of a program evaluation study by  
15 mid-2026 evaluating the cost per participant, participation rate and metrics, cost per  
16 gallon saved, customer satisfaction, enrollment versus outreach metrics, and  
17 administrative overhead.

#### 18 **A. Component 1: The Multi Family Assistance Pilot Program** 19 **(MAPP)**

20 In Component 1, Cal Am identified a mastered metered property within a  
21 disadvantaged or severely disadvantaged community in its San Diego service area.  
22 Cal Am established a partnership with non-profit third party, Dollar Energy, to  
23 assist with the administration of enrolling eligible participants and providing check  
24 payments to tenants.

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<sup>45</sup> Attachment 5-1: Cal Am's Response to Cal Advocates' Data Request SRA-06, Question 1a.

<sup>46</sup> Attachment 5-1: Cal Am's Response to Cal Advocates' Data Request SRA-06, Question 1a.

1           These tenants were not direct Cal Am customers but paid their water bills  
2           to the master meter account holder or management company of the building. The  
3           credit issued was \$45.48 per quarter with program outreach consisting of mailers,  
4           phone calls and dedicated communication infrastructures.<sup>47</sup> However, Component  
5           1 experienced low participation, enrolling only 17 out of 51 eligible tenants. Cal  
6           Am claims it remedied its outreach efforts by enhancing its marketing to direct  
7           outreach expanding to 984 additional eligible tenants in the San Diego Service  
8           area.

9           **B. Component 4: Water Energy Retrofit Program for Multi-**  
10           **Family Mobile Homes**

11           Component 4 expanded Cal Am's existing water energy single family low  
12           income retrofit program to multi-family buildings and mobile home parks where  
13           low-income renters do not pay a water bill directly to Cal Am.<sup>48</sup> Component 4 is  
14           an extension of an existing water energy retrofit program where the participating  
15           energy utility covers the cost of hot water by measuring water heater usage,  
16           showerhead and washing machine upgrades. These upgrades in turn come with the  
17           water utility covering measure costs such as toilet upgrades, aerators and leak  
18           repairs.<sup>49</sup> On Component 4's initiation, Cal Am partnered with Richard Health  
19           Associates but encountered challenges with smaller water districts. The pilot is  
20           ongoing with two multi -family housing complexes currently being retrofitted.  
21           Cal Am claims out of the \$200,000 budgeted, only \$29,948 or 15% has been  
22           allocated towards overhead costs.<sup>50</sup>

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<sup>47</sup> Direct Testimony of Patrick Pilz at 8.

<sup>48</sup> Direct Testimony of Patrick Pilz at 7.

<sup>49</sup> Direct Testimony of Patrick Pilz at 7.

<sup>50</sup> Attachment 5-1: Cal Am's Response to Cal Advocates' Data Request SRA-06, Question 1a.

#### IV. CONCLUSION

1 California American Water's low-income multi-family pilots represent a novel  
2 approach to delivering assistance to a historically underserved and disadvantaged  
3 community. While early results are mixed due to administrative and participation hurdles  
4 such as outreach, communication, and contracting, the Pilot's model holds promise, if  
5 scaled with operational refinements in outreach and participation. For example, Cal Am  
6 must remedy its outreach hurdle to garner more participation and enrollment. The  
7 Commission should accept Cal Am's Special Request 11 for the pilot programs  
8 expansion and extension but with strict conditions contingent on the publication of a  
9 program evaluation study by mid-2026 evaluating the cost per participant, participation  
10 rate and metrics, cost per gallon saved, customer satisfaction, enrollment versus outreach  
11 metrics, and administrative overhead.

# Attachments

**QUALIFICATIONS AND PREPARED TESTIMONY  
OF  
AMA SERWAA**

1    Q.1    Please state your name and address.

2    A.1    My name is Ama Serwaa. My business address is 320 W 4<sup>th</sup> Street, Los Angeles,  
3            CA, 90013.

4

5    Q.2    By Whom are you employed and what is your job title ?

6    A.2    I am employed by the Public Advocates Office at the California Public Utilities  
7            Commission as a Public Utilities Regulatory Analyst.

8

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

10   A.3    I received my Bachelor's degree in Political Science and Public Policy Minor from  
11            the University of California, Riverside in 2016. I also received my Masters degree  
12            in Public Administration, Public Sector Leadership and Management at the  
13            California State University, Northridge in 2023. I was employed by the California  
14            Public Utilities Commission in July 2023.

15

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

17   A.4    I am responsible for the preparation of the Report and Recommendations on  
18            Customer Service, Environmental Social Justice & Action Plan, Water Quality,  
19            Special Request 10 and Special Request 11.

20

21   Q.5    Does that complete your prepared testimony?

22   A.5    Yes

### Attachment 1-1 Guide to Attachments

Attachment 1-2	<p>Standard Disclosures for CAB Data” CPUC Consumer Service and Information Division</p> <p>Cal Am’s Response to Cal Advocates’ Data Request SRA-01, Question 8</p> <p>Cal Am’s Response to Cal Advocates’ Data Request SRA-04, Question 3</p> <p>Cal Am’s Response to Cal Advocates’ Data Request SRA-01, Question 7</p>
Attachment 1-3	A.22-07-001 Cal Advocates Testimony by Isaac Gendler, Report on Depreciation, Earthquake Insurance, Customer Service, Wildfire, and Safety. (Excerpt)
Attachment 1-4	Attachment 1-4: Customer Service Responses, Cal Am’s Response to Cal Advocates’ Data Request SLM-04, Question 2.
Attachment 2-1	Assigned Commissioner’s Scoping Memo and Ruling, Application 25-07-003
Attachment 2-2	<i>None (deleted in the final production)</i>
Attachment 2-3	Cal Am’s Response to Cal Advocates’ Data Request SRA-02, Question 1.
Attachment 3-1	CAW 2025 GRC Final Application Exhibit B Minimum Data Requirements Vol.2 of 3 Page 5.
Attachment 4-1	Cal Am’s Response to Cal Advocates’ Data Request SRA-03, Question 3a.
Attachment 4-2	Direct Testimony of Jonathan Morse (Excerpt)
Attachment 5-1	<p>Direct Testimony of Patrick Pilz (Excerpt),</p> <p>Cal Am’s Response to Cal Advocates’ Data Request SRA-06, Question 1.a.</p>

# Attachment 1-2



CONSUMER AFFAIRS BRANCH

## CAB Data Request Form

Please provide the information about your CAB data request. Once your data request has been received, staff will be able to provide you a data table that reflects your stated needs.

**! Download this form before filling out**

### A. Contact Information

1. Date submitted to CAB: 05/07/2025

2. Deadline Request Date: 05/15/2025

CAB requires a minimum of 5 business days to complete most data requests.  
Expedited requests will be considered by CAB management on an individual case basis.

3. Your Contact Information: Name: Ama Serwaa  
Division/Branch: ORA Phone: (213) 266-4757 Email: Ama.Serwaa@cpuc.ca.gov

### B. Background Information

4. The data will be used to: Assess and analyze Cal AM Customer service complaints & quality for the 2027 GRC.

Understanding the purpose of your request will help guide CAB in preparing the data response.  
Example: *We are considering an OIR and need to find out the number of cramming complaints on a monthly basis from November 2009 to April 2010.*

5. Audience: Internal PUC Audience: Public Advocates Office  
External PUC Audience:

Identifying the end-user audience will help guide CAB in preparing the data response

6. Identify data variables to be included: Name of Utility/Entity: California American Water  
Subject Matter: All Customer service complaints from 01/01/2020 to 05/06/2025

Example: *Customers shut-offs in SoCal Edison territory or complaints about quality of service against all telco companies.*

7. Specific industry, if applicable: ☐ Telecommunications ☐ Energy ☒ Water  
☐ Other/non-regulated:

8. CPCN Number: aka/dba:  
"Certificate of Public Convenience and Necessity" identifying code or other information about the Utility/Entity (if known)

9. Time Period: Start date: 01/01/2020 End date: 05/06/2025  
Provide a specific time period of the data you need. Example: *Feb 1, 2009 to June 30, 2009.*



10. Case Type:<sup>1</sup> ☒ Informal Complaint ☒ Complaint ☐ LifeLine ☒ Inquiry ☒ Phone Contacts  
☒ All Contacts (☐ Include misdirected contacts)

Please identify the case type that you want to include in your data request by checking the appropriate box(es) at the right. The following definitions will assist you in determining which case types will meet your needs:

**Informal Complaint (IC):** Is a written consumer contact expressing dissatisfaction or dispute with an action that is regulated by the CPUC and involves interaction with the utility as part of the resolution process.

**Complaint:** Is a written consumer contact expressing dissatisfaction with a practice of the CPUC or with a regulated or non-regulated utility. These contacts do not involve interaction with utilities as part of the resolution process.

**LifeLine:** Consumer contacts (ICs, complaints, phone) regarding the LifeLine program which provides a subsidy for telecommunications service. LifeLine billing contacts are handled the same way as general billing contacts (ICs). LifeLine appeals are consumers contesting the denial of their applications to the LifeLine program.

**Inquiry:** Is a written consumer contact requesting facts and information for a situation.

**Phone Contacts (non-LifeLine):** Consumer calls in reference to concerns, questions and complaints related to utility companies.

**All contacts** will not include misdirected contacts unless specifically requested.

**Misdirected consumer contacts** are those which are addressed to CAB but are obviously intended for a utility or an agency outside the CPUC.

11. Is Geographic information data required? ☐ Yes ☒ No

If you plan to perform a GIS analysis, you must specifically request geographical information to be included.

Please be aware that consumer contact data and other data held by CAB is subject to the rules and conditions outlined in General Order 66-C and Public Utilities Code Section 583, which apply to public records and the confidentiality of records. These provisions may impact the data request response provided to you.

Signature

**Submit Form**

Click this button to submit the request to [cabdatarequest@cpuc.ca.gov](mailto:cabdatarequest@cpuc.ca.gov).

<sup>1</sup> Case type definitions changed November 2013. CAB staff can advise you how the change impacts pre-November 2013 data.

**RESET FORM**

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

Application of California-American Water Company (U210W) for Authorization to Increase its Revenues for Water Service by \$63,090,981 or 17.20% in the year 2027, by \$22,067,361 or 5.13% in the year 2028, and by \$26,014,600 or 5.75% in the year 2029.

A.25-07-003  
(Filed July 1, 2025)

**CALIFORNIA-AMERICAN WATER COMPANY'S RESPONSE TO  
PUBLIC ADVOCATES OFFICE'S DATA REQUEST SRA-01**

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Attorneys for California-American Water Company

Dated: July 31, 2025

California-American Water Company (U-210- W; “California American Water,” “CAW” or the “Company”) hereby sets forth the following objections and responses to Public Advocates Office’s (“Cal Advocates”) Data Request SRA-01 (“Data Requests” or “RPD”), propounded on July 17, 2025, in A.25-07-003.

### **RESERVATION OF RIGHTS**

1. California American Water’s investigation into the Data Requests is ongoing. The Company reserves the right, without obligating itself to do so, to supplement or modify its responses and to present further information and produce additional documents as a result of its ongoing investigation.

2. Any information or materials provided in response to the Data Requests shall be without prejudice to California American Water’s right to object to their admission into evidence or the record in this proceeding, their use as evidence or in the record, or the relevance of such information or materials. In addition, California American Water reserves its right to object to further discovery of documents, other information or materials relating to the same or similar subject matter upon any valid ground or grounds, including without limitation, the proprietary nature of the information, relevance, privilege, work product, overbreadth, burdensomeness, oppressiveness, or incompetence.

### **GENERAL OBJECTIONS**

1. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they purport to impose upon California American Water any obligations broader than those permitted by law.

2. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they improperly seek the disclosure of information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or doctrine, and/or the client confidentiality obligations mandated by Business and Professions Code Section 6068(e)(1) and Rule 3-100(A) of the California Rules of Professional Conduct. Such responses as may hereafter be given shall not include information protected by such privileges or

doctrines, and the inadvertent disclosure of such information shall not be deemed as a waiver of any such privilege or doctrine.

3. California American Water objects to the Data Requests to the extent that the requests are duplicative and overlapping, cumulative of one another, overly broad, and/or seek responses in a manner that is unduly burdensome, unreasonably expensive, oppressive, or excessively time consuming to California American Water.

4. California American Water objects to the Data Requests to the extent they seek documents that are and/or information that is neither relevant nor material to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

5. California American Water objects to the Data Requests to the extent they seek an analysis, calculation, or compilation that has not previously been performed and that California American Water objects to performing.

6. California American Water objects to the Data Requests insofar as they request the production of documents or information that are publicly available or that are equally available to Cal Advocates because such requests subject California American Water to unreasonable and undue annoyance, oppression, burden and expense.

7. California American Water objects to the Data Requests to the extent the requests are vague, ambiguous, use terms that are subject to multiple interpretations but are not properly defined for purposes of the Data Request, or otherwise provide no basis from which California American Water can determine what information is sought.

8. The objections contained herein, and information and documents produced in response hereto, are not intended nor should they be construed to waive California American Water's right to object to the Data Requests, responses or documents produced in response hereto, or the subject matter of such Data Requests, responses or documents, as to their competency, relevancy, materiality, privilege and admissibility as evidence for any purpose, in or at any hearing of this or any other proceeding.

9. The objections contained herein are not intended nor should they be construed to waive California American Water's right to object to other discovery involving or relating to the subject matter of the Data Requests, responses or documents produced in response hereto.

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
655 West Broadway #1410  
San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-01  
**Company Number:** Cal Adv SRA-01 Q001  
**Date Received:** July 17, 2025  
**Date Response Provided:** July 31, 2025  
**Subject Area:** Customer Service Standards

---

**DATA REQUEST:**

1. Telephone Performance Standards: Please Provide the following annual data for all Customer Service Area (CSA)'s of Cal Am's districts in a tabulated excel spreadsheet for years 2020 – 2025.
  - a) Call Answer Service Level: Total Number of calls reaching a utility representative within 30 seconds.
  - b) Total Number of calls attempting to reach a utility representative.
  - c) Abandoned Call Rate: Total Number of Calls Abandoned.
  - d) Abandoned Call Rate: Total Number of attempts to reach a utility representative.
  - e) In the case where calls were answered in more than 30 seconds which does not meet GO-103 A, Appendix E 1. (A), please provide the reason(s) as to why Cal AM did not meet GO-103 A standards as well as measures taken to ensure future compliance.

**CAL-AM'S RESPONSE**

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request on the grounds it is overbroad and seek voluminous data and is therefore unduly burdensome. California American Water also objects to this request on the grounds it seeks an analysis, calculation, or compilation that has not previously been performed and is therefore unduly burdensome. California American Water also objects to this request on the grounds it seeks information irrelevant to this proceeding and because it

seeks information that is publicly available or that is equally available to Cal PA. Subject to, but without waiving, those objections, California American Water responds as follows

Response to SRA-01 Q001 a) through d):

State totals:

Performance Standards	Performance Measure	2020	2021	2022	2023	2024	2025 Jan - Jun
<b>Telephone Performance</b>							
Total Calls Received		125,209	115,746	111,272	103,183	94,185	51,027
Total Calls Answered in 30 seconds		49,524	19,219	28,110	50,702	66,326	40,478
% of Calls Answered in 30 seconds	≥ 80%	68%	45%	43%	62%	77%	84%
Total Abandoned Calls		21,091	32,649	26,271	11,815	4,325	1,317
% Abandoned Call Rate	≤ 5%	17%	28%	24%	11%	5%	3%

(also attached as CAW Response Cal Adv SRA-01 Q001.a-d Attachment 1)

e) American Water and its third-party call center agency experienced high turnover amounts of customer care agents in the period after the onset of the COVID-19 pandemic. As a result, the total calls answered within 30 seconds fell below the GO-103 A standard. The Company has taken measures to improve recruitment, training, and retention of customer care agents and as a result, the total calls answered within 30 seconds has improved over time.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
655 West Broadway #1410  
San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-01  
**Company Number:** Cal Adv SRA-01 Q002  
**Date Received:** July 17, 2025  
**Date Response Provided:** July 31, 2025  
**Subject Area:** Customer Service Standards

---

**DATA REQUEST:**

2. Billing Performance Standards: Please Provide the following annual data for all CSA's of Cal Am's districts in a tabulated excel spreadsheet for years 2020 – 2025.
- a) Bill Rendering: Total Number of bills not rendered within seven calendar days of the scheduled billing date.
  - b) Total Number of Bills Scheduled to be rendered.
  - c) Bill Accuracy: Total Number of bills rendered inaccurately for the cycle.
  - d) Bill Accuracy: Total number of bills rendered for the billing cycle.
  - e) Payment Posting Performance: Total Number of Payment Posting Errors.
  - f) Payment Posting Performance: Total Number of Payments posted.

**CAL-AM'S RESPONSE**

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request on the grounds it is overbroad and seek voluminous data and is therefore unduly burdensome. California American Water also objects to this request on the grounds it seeks an analysis, calculation, or compilation that has not previously been performed and is therefore unduly burdensome. California American Water also objects to this request on the grounds it seeks information irrelevant to this proceeding and because it seeks information that is publicly available or that is equally available to Cal



California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

PA. Subject to, but without waiving, those objections, California American Water responds as follows

State totals:

Performance Standards	Performance Measure	2020	2021	2022	2023	2024	2025 Jan - Jun
<b>Billing</b>							
Total Bills Rendered		2,238,070	2,256,739	2,304,175	2,328,367	2,355,758	1,167,324
Total Bills Rendered in 7 days		2,178,699	2,213,318	2,234,892	2,271,633	2,314,804	1,141,124
Total Bills Not Rendered in 7 days		59,371	43,421	69,283	56,734	40,954	26,200
<b>% Bills Rendered in 7 days</b>	<b>≥ 99%</b>	<b>97%</b>	<b>98%</b>	<b>97%</b>	<b>98%</b>	<b>98%</b>	<b>98%</b>
Total Inaccurate Bills		17,406	9,050	11,040	10,421	7,577	3,470
<b>% of Inaccurate Bills</b>	<b>≤ 3%</b>	<b>0.78%</b>	<b>0.40%</b>	<b>0.48%</b>	<b>0.45%</b>	<b>0.32%</b>	<b>0.30%</b>
Total Payments Posted		1,958,859	1,962,826	2,013,772	2,062,136	2,118,772	1,022,124
Total Errored Payments		5,215	6,751	5,724	3,385	3,105	1,396
<b>% Payment Posting Error</b>	<b>≤ 1%</b>	<b>0.27%</b>	<b>0.34%</b>	<b>0.28%</b>	<b>0.16%</b>	<b>0.15%</b>	<b>0.14%</b>

(also attached CAW Response Cal Adv SRA-01 Q002 Attachment 1)

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
655 West Broadway #1410  
San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-01  
**Company Number:** Cal Adv SRA-01 Q003  
**Date Received:** July 17, 2025  
**Date Response Provided:** July 31, 2025  
**Subject Area:** Customer Service Standards

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**DATA REQUEST:**

3. Meter Reading Performance Standards: Please Provide the following annual data for all Customer Service Area CSA's of Cal Am's districts in a tabulated excel spreadsheet for years 2020 – 2025.

- a. Total number of scheduled meters not read.
- b. Total number of meter readings scheduled.

**CAL-AM'S RESPONSE**

Please see attached CAW Response Cal Adv SRA-01 Q003.a-b Attachment 1.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
655 West Broadway #1410  
San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-01  
**Company Number:** Cal Adv SRA-01 Q004  
**Date Received:** July 17, 2025  
**Date Response Provided:** July 31, 2025  
**Subject Area:** Customer Service Standards

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**DATA REQUEST:**

4. Work Completion Performance Standards: Please Provide the following annual data for all Customer Service Area CSA's of Cal Am's districts in a tabulated excel spreadsheet for years 2020 – 2025.

- a. Total number of scheduled appointments missed.
- b. Total number of scheduled appointments.
- c. Number of customer orders not completed on or before the scheduled date.
- d. Total number of customer orders scheduled and completed in the reporting month.

**CAL-AM'S RESPONSE**

For a table on scheduled appointments, questions 4.a and 4.b, please see attached CAW Response Cal Adv SRA-01 Q004.a-b Attachment 1.

For a table on customer orders, questions 4.c and 4.d, please see attached CAW Response Cal Adv SRA-01 Q004.c-d Attachment 2.

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
 655 West Broadway #1410  
 San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-01  
**Company Number:** Cal Adv SRA-01 Q005  
**Date Received:** July 17, 2025  
**Date Response Provided:** July 31, 2025  
**Subject Area:** Customer Service Standards

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### **DATA REQUEST:**

5. Response to Customer and Regulatory Complaints Performance Standard:  
Please provide the following annual data for all CSA's for the years 2020-2025.

- a. Number of complaints reported to the utility by the Consumer Affairs Branch (CAB).
- b. Total Number of Customers.

### **CAL-AM'S RESPONSE**

- a) Number of complaints reported

<b>CAB/CPUC complaints</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
<b>Dunnigan</b>						1	<b>1</b>
<b>Hillview</b>	3		1		1	1	<b>6</b>
<b>Larkfield</b>		1					<b>1</b>
<b>Los Angeles</b>	7	5	4	9	9	6	<b>40</b>
<b>Monterey</b>	14	9	8	12	2	6	<b>51</b>
<b>Sacramento</b>	20	11	11	22	15	12	<b>91</b>
<b>San Diego</b>	3	2	2	3		3	<b>13</b>
<b>Ventura</b>		5	5	2	3	2	<b>17</b>
<b>Total</b>	47	33	31	48	30	31	<b>220</b>

b) Total number of customers:

<b>Customer Count</b>						
<b>Water and Sewer</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
<b>Dunnigan</b>	143	156	166	171	175	175
<b>Larkfield</b>	2,288	2,318	2,333	2,339	2,360	2,351
<b>Los Angeles</b>	28,321	31,304	33,094	33,145	33,325	33,282
<b>Monterey</b>	42,206	42,364	42,336	42,371	42,422	42,430
<b>Sacramento</b>	64,034	64,975	65,533	66,258	68,112	67,947
<b>San Diego</b>	21,369	21,392	21,388	21,416	21,462	21,450
<b>Ventura</b>	20,831	20,824	21,471	21,484	21,526	21,544
<b>Total</b>	179,192	183,333	186,321	187,184	189,382	189,179
excludes private fire and public fire hydrants						

**Response Provided By:** Jessica Taylor  
**Title:** Dir. of Southern Division Operations  
**Address:** California American Water  
8657 Grand Avenue  
Rosemead  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-01  
**Company Number:** Cal Adv SRA-01 Q006  
**Date Received:** July 17, 2025  
**Date Response Provided:** July 31, 2025  
**Subject Area:** Customer Service Standards

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**DATA REQUEST:**

6. Service Interruption: Please provide the following annual data for all CSA's for the years 2020-2025.

- a) Provide a record of all interruptions in a CSA exceeding more than 10 service connections with the following data.
  - i. Date and time service is interrupted.
  - ii. Number of service connections affected.
  - iii. Equipment that operated or failed.
  - iv. Cause of interruption.
  - v. Actions required to restore service.
  - vi. Categories of person reporting, and steps taken to prevent such recurrence.

**CAL-AM'S RESPONSE**

Please see CAW Response Cal Adv SR-01 Q006 Attachments 1 through 5.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Nina Miller  
**Title:** Manager Engineering Asset Planning  
**Address:** California American Water  
511 Forest Lodge Road, Ste 100  
Pacific Grove  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-01  
**Company Number:** Cal Adv SRA-01 Q007  
**Date Received:** July 17, 2025  
**Date Response Provided:** July 31, 2025  
**Subject Area:** Customer Service Standards

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**DATA REQUEST:**

As a requirement, America's Water Infrastructure Act ("AWIA") community water systems must submit a Risk and Resilience Assessment Certification to the United States Environmental Protection Agency ("EPA"). Provide a copy of the most recent Risk and Resilience Assessment Certification that Cal Am has submitted to the EPA for each water system.

**CAL-AM'S RESPONSE**

The certifications of Risk and Resilience completions for each California American Water Company system serving more than 3,300 persons are included in CAW Response Cal Adv SRA-01 Q007 Attachments 1, 2, and 3.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** JD Danielson  
**Title:** Senior Program Manager, Safety & Health  
**Address:** California American Water  
4701 Beloit Drive  
Sacramento  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-01  
**Company Number:** Cal Adv SRA-01 Q008  
**Date Received:** July 17, 2025  
**Date Response Provided:** July 31, 2025  
**Subject Area:** Customer Service Standards

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**DATA REQUEST:**

8. Please provide searchable PDF copies of Cal Am's Emergency Response Plans for each water system.

**CAL-AM'S RESPONSE**

Attached are the Emergency Response Plans for each water system from California American Water as CAW Response Cal Adv SRA-01 Q008 Attachments 1 – 8.



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

Application of California-American Water Company (U210W) for Authorization to Increase its Revenues for Water Service by \$63,090,981 or 17.20% in the year 2027, by \$22,067,361 or 5.13% in the year 2028, and by \$26,014,600 or 5.75% in the year 2029.

A.25-07-003  
(Filed July 1, 2025)

**CALIFORNIA-AMERICAN WATER COMPANY'S RESPONSE TO  
PUBLIC ADVOCATES OFFICE'S DATA REQUEST SRA-04**

Cathy Hongola-Baptista  
Nicholas A. Subias  
California American Water  
555 Montgomery Street, Suite 816  
San Francisco, CA 94111  
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50 California Street  
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San Francisco, CA 94111  
(415) 398-3600  
ldolqueist@nossaman.com

Attorneys for California-American Water Company

Dated: September 24, 2025

California-American Water Company (U-210- W; “California American Water,” “CAW” or the “Company”) hereby sets forth the following objections and responses to Public Advocates Office’s (“Cal Advocates”) Data Request SRA-04 (“Data Requests” or “RPD”), propounded on September 10, 2025, in A.25-07-003.

### **RESERVATION OF RIGHTS**

1. California American Water’s investigation into the Data Requests is ongoing. The Company reserves the right, without obligating itself to do so, to supplement or modify its responses and to present further information and produce additional documents as a result of its ongoing investigation.

2. Any information or materials provided in response to the Data Requests shall be without prejudice to California American Water’s right to object to their admission into evidence or the record in this proceeding, their use as evidence or in the record, or the relevance of such information or materials. In addition, California American Water reserves its right to object to further discovery of documents, other information or materials relating to the same or similar subject matter upon any valid ground or grounds, including without limitation, the proprietary nature of the information, relevance, privilege, work product, overbreadth, burdensomeness, oppressiveness, or incompetence.

### **GENERAL OBJECTIONS**

1. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they purport to impose upon California American Water any obligations broader than those permitted by law.

2. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they improperly seek the disclosure of information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or doctrine, and/or the client confidentiality obligations mandated by Business and Professions Code Section 6068(e)(1) and Rule 3-100(A) of the California Rules of Professional Conduct. Such responses as may hereafter be given shall not include information protected by such privileges or

doctrines, and the inadvertent disclosure of such information shall not be deemed as a waiver of any such privilege or doctrine.

3. California American Water objects to the Data Requests to the extent that the requests are duplicative and overlapping, cumulative of one another, overly broad, and/or seek responses in a manner that is unduly burdensome, unreasonably expensive, oppressive, or excessively time consuming to California American Water.

4. California American Water objects to the Data Requests to the extent they seek documents that are and/or information that is neither relevant nor material to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

5. California American Water objects to the Data Requests to the extent they seek an analysis, calculation, or compilation that has not previously been performed and that California American Water objects to performing.

6. California American Water objects to the Data Requests insofar as they request the production of documents or information that are publicly available or that are equally available to Cal Advocates because such requests subject California American Water to unreasonable and undue annoyance, oppression, burden and expense.

7. California American Water objects to the Data Requests to the extent the requests are vague, ambiguous, use terms that are subject to multiple interpretations but are not properly defined for purposes of the Data Request, or otherwise provide no basis from which California American Water can determine what information is sought.

8. The objections contained herein, and information and documents produced in response hereto, are not intended nor should they be construed to waive California American Water's right to object to the Data Requests, responses or documents produced in response hereto, or the subject matter of such Data Requests, responses or documents, as to their competency, relevancy, materiality, privilege and admissibility as evidence for any purpose, in or at any hearing of this or any other proceeding.

9. The objections contained herein are not intended nor should they be construed to waive California American Water's right to object to other discovery involving or relating to the subject matter of the Data Requests, responses or documents produced in response hereto.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
655 West Broadway #1410  
San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-04  
**Company Number:** Cal Adv SRA-04 Q001  
**Date Received:** September 10, 2025  
**Date Response Provided:** September 24, 2025  
**Subject Area:** Follow up to SRA-01

---

**DATA REQUEST:**

1. Refer to DR SRA-01, question 1.a. and 1.b. Cal Advocates requested “total number of calls reaching a utility representative within 30 seconds” and “total number of calls attempting to reach a utility representative” for years 2020-2025. Cal Am responded with “total calls received” and “total calls answered in 30 seconds” in CAW Response to Cal Adv SRA-01 Q001.a-d Attachment 1.xlsx. Please answer the following:

- a) Please confirm whether Cal Am’s “Total Calls Answered in 30 Seconds” corresponds to “total number of calls reaching a utility representative within 30 seconds.” If not, provide data using the chart below.
- b) Confirm whether Cal Am’s “Total Calls Received” corresponds to “total number of calls attempting to reach a utility representative.” If not, provide data using the chart below.
- c) In Cal Am’s calculation of Telephone Performance, the % of calls answered in 30 seconds, Cal Am provided 68% for 2020, 45% for 2021, 43% for 2022, 63% for 2023, 77% for 2024, and 84% for the first half of 2025. Also, for % of abandoned calls, Cal Am provided 17% for 2020, 28% for 2021, 24% for 2022, 11% for 2023, 5% for 2024, and 3% for the first half of 2025. Provide underlying numbers, the numerator and the denominator, for each percentage calculated. Provide these numbers in a MS Excel worksheet with the formula intact. Also provide the source of the “underlying numbers.”

Call Answer Performance Measure	2020	2021	2022	2023	2024	2025

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

Number of Calls Reaching a utility rep. w/n 30 seconds						
Total Number of attempts to reach a utility rep.						

**CAL-AM'S RESPONSE**

- a) Yes, "Total Calls Answered in 30 Seconds" corresponds to "total number of calls reaching a utility representative within 30 seconds."
- b) Yes, "Total Calls Received" corresponds to "total number of calls attempting to reach a utility representative."
- c) Please refer to the attachment CAW Response Cal Adv SRA-04 Q001 Attachment 1. The Company tracks total calls answered in 30 seconds only for calls received Monday – Friday. Calls received on Saturdays and Sundays are not factored into this calculation. The abandoned call percentage is based on total call volume, including weekend calls. This information comes from an American Water dashboard that tracks historical statistics from the call center.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
655 West Broadway #1410  
San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-04  
**Company Number:** Cal Adv SRA-04 Q002  
**Date Received:** September 10, 2025  
**Date Response Provided:** September 24, 2025  
**Subject Area:** Follow up to SRA-01

---

**DATA REQUEST:**

2. Refer to DR SRA-01 question 3.a and 3.b. Cal Advocates requested “total number of scheduled meters not read,” and “total number of meter readings scheduled” for years 2020-2025. Cal Am provided data for “total reads,” “estimate reads,” “estimate %” and “actual %” in CAW Response to Cal Adv SRA-01 question 3.a-b Attachment 1.xlsx. Please answer the following:

- a) Confirm whether Cal Am’s “Estimate Reads” corresponds to “total number of scheduled meters not read.” If not, provide data using the chart below.
- b) Cal Am’s “Total Reads” does not appear to correspond to “total number of meter readings scheduled.” If not, provide data using the chart below.
- c) If the total number of scheduled meter readings is the sum of “Total Reads” and “Estimate Reads.” Please confirm, if not, provide data using the chart below.

Meter Reading Performance Standard	2020	2021	2022	2023	2024	2025
Number of Scheduled meters not read						



California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

Total Number of meter readings scheduled						
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**CAL-AM'S RESPONSE**

2.a. The "Estimate Reads" column closely reflects the count of all scheduled meter readings where an actual read that could be used for billing purposes was not obtained. This could be either because the meter was not read or, in some instances, the meter was read but the read could not be used for billing purposes for technical or system reasons (timing of the read, read transmission issue, etc.).

2.b. The "Total Reads" represents the number of meters scheduled to be read in each area by year, including both, actual and estimated reads.

2.c. The total number of scheduled meter readings is represented by the "Total Reads." The Estimated reads are already included in that count and should not be added again.

Meter Reading Performance Standard	2020	2021	2022	2023	2024	Through 8/2025
Number of Scheduled meters not read	29,423	34,007	45,818	63,771	81,088	30,381

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

Total Number of meter readings scheduled	2,178,110	2,185,995	2,237,878	2,270,536	2,303,628	1,301,473
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California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Nina Miller  
**Title:** Manager Engineering-Asset Planning  
**Address:** California American Water  
511 Forest Lodge Rd, Ste 100  
Pacific Grove  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-04  
**Company Number:** Cal Adv SRA-04 Q003  
**Date Received:** September 10, 2025  
**Date Response Provided:** September 24, 2025  
**Subject Area:** Follow up to SRA-01

---

**DATA REQUEST:**

3. Refer to DR SRA-01 question 7. Cal Am provided outdated AWIA Risk and Resilience Assessment Certifications for Lincoln Oaks, Monterey, Parkway, San Marino, Suburban and Thousand Oaks. Provide updated certifications.

**CAL-AM'S RESPONSE**

The certifications Cal Am provided in response to SRA-01 Q7 are still valid and not outdated as alleged in the DR SRA-04 Q3.

The Risk and Resilience Assessment ("RRA") Under AWIA Section 2013, requires community water systems serving over 3,300 people to:

- Review their existing RRA at least once every five years.
- Revise the RRA if necessary.
- Submit a certification to the U.S. Environmental Protection Agency (EPA) confirming that the review and revisions have been completed.

The above requirements have varying deadlines based on population served:

- For populations  $\geq 100,000$ : The deadline to submit a certification was March 31, 2025.
- For populations 50,000–99,999: The deadline to submit a certification is December 31, 2025.
- For populations 3,301–49,999: The deadline to submit a certification is June 30, 2026.

Cal Am is currently reviewing and updating the RRA for Lincoln Oaks, Monterey, Parkway, San Marino, Suburban and Thousand Oaks and will certify the review and

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

updates according to the Federal deadline of December 31, 2025, for these systems with populations of 50,000-99,999.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
655 West Broadway #1410  
San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-04  
**Company Number:** Cal Adv SRA-04 Q004  
**Date Received:** September 10, 2025  
**Date Response Provided:** September 24, 2025  
**Subject Area:** Follow up to SRA-01

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**DATA REQUEST:**

4. Refer to DR SRA-01 question 2 a-b. Cal Advocates requested “total number of bills not rendered within seven calendar days of the scheduled billing date” and “total number of bills scheduled to be rendered.” Cal Am provided data for “total bills rendered,” “total bills rendered in 7 days,” and “total bills not rendered in 7 days.” Provide data as requested by Cal Advocates using the chart below.

<b>Bill Rendering Performance</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025 (Jan – Jun)</b>
Number of bills not rendered w/n seven calendar days of the scheduled billing date						
Total number of bills scheduled to be rendered						

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**CAL-AM'S RESPONSE**

Please see table below for clarification.

<b>Bill Rendering Performance</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025 (Jan – Jun)</b>
Number of bills not rendered w/n seven calendar days of the scheduled billing date	59,371	43,421	69,283	56,734	40,954	26,200
Total number of bills scheduled to be rendered	2,238,070	2,256,739	2,304,175	2,328,367	2,355,758	1,167,324

# Attachment 1-3



## CHAPTER 3 Customer Service

### I. INTRODUCTION

This chapter presents analyses and recommendations for Cal Am's customer service performance and financing.

### II. SUMMARY OF RECOMMENDATIONS

The Commission should reduce Cal Am's proposed revenue requirement (budget) for the Service Company by \$39,691, to align with Cal Am's failure to meet customer service performance standards over the past five years. This would result in a \$2,646,094 Service Company budget for Test Year 2024 and ratepayer savings of \$39,691. Cal Advocates witness Kerrie Evans recommends further reductions to the Service Company budget.

Cal Am should also track CSC and Local Office Complaints and report this information in its Minimum Data Requirement (MDR) II H.1 response in future GRCs.

### III. ANALYSIS

#### A. Customer Service Funding

General Order (GO) 103-A requires all Class A and Class B water utilities that employ automated call distribution systems to comply with customer service and reporting standards laid out in ten metrics: (1) call answering service level; (2) abandoned call rate during normal business hours; (3) percentage of bills rendered (mailed) within seven calendar days of the scheduled billing date; (4) bills found inaccurate; (5) payment posting errors; (6) final read and final bill; (7) percentage of actual meter readings per billing cycle; (8) keeping scheduled appointments; (9) percentage of customer-requested work not completed on or before the scheduled date; and (10) percentage of customers who file complaints with the

Commission’s Consumer Affairs Branch (CAB).<sup>39</sup> For five consecutive years, Cal Am consistently failed two out of these ten metrics: (1) abandoned call rate during normal business hours (“abandoned call rate”), and (2) percentage of bills rendered (mailed) within seven calendar days of the scheduled billing date (“percentage of bills rendered within 7 days”).<sup>40</sup>

The abandoned call rate is the percentage of calls abandoned before reaching a utility representative (requested by the customer) during normal business.<sup>41</sup> This amount is calculated by dividing the number of calls abandoned by the number of attempts to reach a utility representative.<sup>42</sup> General Order 103-A sets a standard of 5% for this metric.<sup>43</sup> Therefore, Class A and B water utilities should have an abandoned call rate of equal to or less than 5%. However, Cal Am had an average abandoned call rate of 17.6% for the five-year period from 2017 to 2021,<sup>44</sup> which is more than triple the 5% standard.<sup>45 46</sup>

The percentage of bills rendered is the percentage of bills mailed within seven calendar days of the scheduled billing date.<sup>47</sup> General Order 103-A sets a

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<sup>39</sup> GO 103-A, Appendix E.

<sup>40</sup> Attachment 3-1: Cal Am’s Response to Cal Advocates’ Data Request ISC-001, Q002.i-iv, Attachment 1.

<sup>41</sup> GO 103-A, Appendix E, Section 1.B at 1.

<sup>42</sup> GO 103-A, Appendix E, Section 1.B at 1.

<sup>43</sup> GO 103-A, Appendix E, Section 1.B at 2.

<sup>44</sup> Attachment 3-1: Cal Am’s Response to Cal Advocates’ Data Request ISC-001, Q002.i-iv, Attachment 1. Five-year average for % Abandoned Call Rate → (12% + 25% + 7% + 16% + 28%)/5 → 17.6%.

<sup>45</sup> GO 103-A, Appendix E, Section 1.B at 2.

<sup>46</sup> There is a 12.6% difference between Cal Am’s recorded values and the 5% standard for its abandoned call rate.

<sup>47</sup> GO 103-A, Appendix E, Section 2.A at 2.

1 standard of 99% for this metric.<sup>48</sup> Therefore, the percentage of bills rendered by  
2 Class A and B should be equal to or greater than 99%.<sup>49</sup> However, Cal Am has an  
3 average percentage of bills rendered of 97% for the five-year period from 2017 to  
4 2021.<sup>50 51</sup>

5 Utilities should only receive ratepayer funding for services that provide  
6 adequate service to customers. As discussed below, Cal Advocates recommends  
7 that the Commission reduce the budget for the Service Company to account for  
8 Cal Am's failure to meet the service standards for these two metrics.

9 The Service Company operates the Customer Service Centers ("CSCs")  
10 that handle customer calls, billing, and collection activities for California  
11 American Water and its public utility affiliates.<sup>52</sup> The CSCs handle customer  
12 inquiries and correspondence, and process service order requests.<sup>53</sup> The Service  
13 Company's Customer Service Organization costs for the past five years (2017-  
14 2021) has averaged 17.3% of its budget.<sup>54</sup> Because Cal Am is proposing  
15 \$15,295,341 in TY 2024 for Operational Expenditure ("OpEx") costs for the

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<sup>48</sup> GO 103-A, Appendix E, Section 2.A.at 2.

<sup>49</sup> G.O 103-A, Appendix E, Section 2.A at 2.

<sup>50</sup> Attachment 3-1: Cal Am's Response to Cal Advocates' Data Request ISC-001, Q002.i-iv, Attachment 1. Five-year average for % Bills Rendered in 7 Days → (97% + 98% + 95% + 97% + 98%)/5 → 97%.

<sup>51</sup> The data for the calculation of the averages is from Attachment 3-1: Cal Am's Response to Cal Advocates' Data Request ISC-001, Q002.i-iv, Attachment 1.

<sup>52</sup> Direct Testimony of John M. Watkins, July 7, 2022, at 3.

<sup>53</sup> Direct Testimony of John M. Watkins, July 7, 2022, at 3.

<sup>54</sup> Attachment 3-2: Customer Service Org - Operational Expenditure Cost Ratio; See also, Attachment 3-3: Cal Am's Response to Cal Advocates' Data Request KKE 01, Q007, Attachment 1 (yearly customer service organization costs highlighted in yellow, yearly total OpEx costs highlighted in blue).

1 Service Company,<sup>55</sup> a reasonable estimate of the Customer Service Organizations  
2 budget is \$2,646,094 for the test year.<sup>56</sup>

3 The Commission should remove 1.5% off the estimated \$2,646,094 budget  
4 of the Customer Service Organization (“CSO”) (\$39,691) to account for the  
5 minimum service levels not being received by ratepayers.<sup>57</sup> Cal Am’s funding  
6 request for CSO should be reduced to be commensurate with the service level  
7 customers are receiving. Therefore, Cal Am’s proposed OpEx costs for TY 2024  
8 should be reduced by \$39,691.

### 9 **B. Customer Complaint Tracking**

10 The Rate Case Plan requires Cal Am to provide information about the  
11 number of customer complaints received in last three years, categorized by major  
12 subject areas, in GRCs.<sup>58</sup> MDR II.H.1 reflects this requirement.<sup>59</sup>

13 In this GRC, Cal Am reported the number of Informal PUC Complaints<sup>60</sup> it  
14 received in response to MDR II.H.1.<sup>61</sup> It did not report any other categories of

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<sup>55</sup> RO Model file ALL\_CH04\_O&M\_RO\_Service Co workpage Ser Co Costs W-Spec Adj WS7 2024 projected amounts.

<sup>56</sup>  $\$15,295,341 \times 17.3\% = \$2,646,094$ . Since Customer Service Organization has averaged 17.3% of all (OpEx)-related costs for the Service Company, using 17.3% as an estimate for the TY 2024 proposed Service Organization OpEx costs for Customer Service Organization is reasonable.

<sup>57</sup>  $(12.6\% + 2.0\% + 0\% + 0\% + 0\% + 0\% + 0\% + 0\% + 0\% + 0\%) / 10 = 1.5\%$ . In the numerator of this formula, 12.6% and 2.0% represent the difference between Cal Am’s actual performance and the standard for two metrics: (1) abandoned call rate, and (2) percentage of bills rendered within 7 days. The eight 0% values in the numerator represent the other eight metrics; Cal Advocates assigned a value of 0% because Cal Am met the standard for those metrics. The denominator is 10 because there are ten metrics total.

<sup>58</sup> D.07-06-052, Appendix A at A-30; MDR II.H.1.

<sup>59</sup> “The Results of Operation Report must contain information about the number of customer complaints received in the last three years for the district, categorized by major subject areas.”

<sup>60</sup> Informal customer complaints about Cal Am sent to the CPUC.

<sup>61</sup> Cal American Application, Exhibit B, MDR II.H.1 Response.

# Attachment 1-4

## Confidential Attachments

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

Application of California-American Water Company (U210W) for Authorization to Increase its Revenues for Water Service by \$63,090,981 or 17.20% in the year 2027, by \$22,067,361 or 5.13% in the year 2028, and by \$26,014,600 or 5.75% in the year 2029.

A.25-07-003  
(Filed July 1, 2025)

**CALIFORNIA-AMERICAN WATER COMPANY'S RESPONSE TO  
PUBLIC ADVOCATES OFFICE'S DATA REQUEST SLM-04**

Cathy Hongola-Baptista  
Nicholas A. Subias  
California American Water  
555 Montgomery Street, Suite 816  
San Francisco, CA 94111  
(415) 293-3023  
cathy.hongola-baptista@amwater.com

Lori Anne Dolqueist  
Alex Van Roekel  
Nossaman LLP  
50 California Street  
34<sup>th</sup> Floor  
San Francisco, CA 94111  
(415) 398-3600  
ldolqueist@nossaman.com

Attorneys for California-American Water Company

Dated: August 25, 2025

California-American Water Company (U-210- W; “California American Water,” “CAW” or the “Company”) hereby sets forth the following objections and responses to Public Advocates Office’s (“Cal Advocates”) Data Request SLM-04 (“Data Requests” or “RPD”), propounded on August 11, 2025, in A.25-07-003.

### **RESERVATION OF RIGHTS**

1. California American Water’s investigation into the Data Requests is ongoing. The Company reserves the right, without obligating itself to do so, to supplement or modify its responses and to present further information and produce additional documents as a result of its ongoing investigation.

2. Any information or materials provided in response to the Data Requests shall be without prejudice to California American Water’s right to object to their admission into evidence or the record in this proceeding, their use as evidence or in the record, or the relevance of such information or materials. In addition, California American Water reserves its right to object to further discovery of documents, other information or materials relating to the same or similar subject matter upon any valid ground or grounds, including without limitation, the proprietary nature of the information, relevance, privilege, work product, overbreadth, burdensomeness, oppressiveness, or incompetence.

### **GENERAL OBJECTIONS**

1. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they purport to impose upon California American Water any obligations broader than those permitted by law.

2. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they improperly seek the disclosure of information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or doctrine, and/or the client confidentiality obligations mandated by Business and Professions Code Section 6068(e)(1) and Rule 3-100(A) of the California Rules of Professional Conduct. Such responses as may hereafter be given shall not include information protected by such privileges or



doctrines, and the inadvertent disclosure of such information shall not be deemed as a waiver of any such privilege or doctrine.

3. California American Water objects to the Data Requests to the extent that the requests are duplicative and overlapping, cumulative of one another, overly broad, and/or seek responses in a manner that is unduly burdensome, unreasonably expensive, oppressive, or excessively time consuming to California American Water.

4. California American Water objects to the Data Requests to the extent they seek documents that are and/or information that is neither relevant nor material to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

5. California American Water objects to the Data Requests to the extent they seek an analysis, calculation, or compilation that has not previously been performed and that California American Water objects to performing.

6. California American Water objects to the Data Requests insofar as they request the production of documents or information that are publicly available or that are equally available to Cal Advocates because such requests subject California American Water to unreasonable and undue annoyance, oppression, burden and expense.

7. California American Water objects to the Data Requests to the extent the requests are vague, ambiguous, use terms that are subject to multiple interpretations but are not properly defined for purposes of the Data Request, or otherwise provide no basis from which California American Water can determine what information is sought.

8. The objections contained herein, and information and documents produced in response hereto, are not intended nor should they be construed to waive California American Water's right to object to the Data Requests, responses or documents produced in response hereto, or the subject matter of such Data Requests, responses or documents, as to their competency, relevancy, materiality, privilege and admissibility as evidence for any purpose, in or at any hearing of this or any other proceeding.

9. The objections contained herein are not intended nor should they be construed to waive California American Water's right to object to other discovery involving or relating to the subject matter of the Data Requests, responses or documents produced in response hereto.

**Response Provided By:** Gini Russo  
**Title:** Human Resources Business Partner  
**Address:** California American Water  
511 Forest Ldg Rd, Ste 100  
Pacific Grove  
**Cal Adv Request:** A2507003 Public Advocates DR SLM-04  
**Company Number:** Cal Adv SLM 04 Q001  
**Date Received:** August 11, 2025  
**Date Response Provided:** August 25, 2025  
**Subject Area:** Total Compensation (CONFIDENTIAL)

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**DATA REQUEST:**

**Referring** to the CONFIDENTIAL Direct Testimony of Robert Mustich (Mustich Testimony) and the RO Model extract (attached here as Attachment 1, Labor Worksheet Extract) of worksheet [Y\_Current Employees WS-A] in workbook [ALL\_CH04\_O&M\_WP\_Labor]. **Do not update** the Excel attachments if the Excel prompts to update the links for Attachment 1 and Attachment 2. **Do not reformat** the Excel attachments and provide the information where indicated.

1. Provide the 2023, 2024, and 2025 full unredacted Employee Information Report Cal Am submitted in compliance with Senate Bill 1162.

**CAL-AM'S RESPONSE**

Please see CAW Response Cal Adv SLM-04 Q001 Attachments 1 through 3.

**Response Provided By:** Joey Chen  
**Title:** Senior Manager Regulatory Services  
**Address:** California American Water  
520 Capitol Mall, Suite 630  
Sacramento  
**Cal Adv Request:** A2507003 Public Advocates DR SLM-04  
**Company Number:** Cal Adv SLM 04 Q002  
**Date Received:** August 11, 2025  
**Date Response Provided:** August 25, 2025  
**Subject Area:** Total Compensation (CONFIDENTIAL)

---

**DATA REQUEST:**

**Referring** to the CONFIDENTIAL Direct Testimony of Robert Mustich (Mustich Testimony) and the RO Model extract (attached here as Attachment 1, Labor Worksheet Extract) of worksheet [Y\_Current Employees WS-A] in workbook [ALL\_CH04\_O&M\_WP\_Labor]. **Do not update** the Excel attachments if the Excel prompts to update the links for Attachment 1 and Attachment 2. **Do not reformat** the Excel attachments and provide the information where indicated.

2. Column K in worksheet [Y\_Current Employees WS-A] of the RO Model only shows a single executive employee [Job ID #: 30200204]
  - a. Confirm if Cal Am only has one (1) executive level employee.
  - b. If not, identify all executive level employees in Column M of Attachment 1 and identify where executive level employee information can be found in Cal Am's RO Model.

**CAL-AM'S RESPONSE**

- a. [REDACTED]
- b. N/A

**Response Provided By:** Joey Chen  
**Title:** Senior Manager Regulatory Services  
**Address:** California American Water  
520 Capitol Mall, Suite 630  
Sacramento  
**Cal Adv Request:** A2507003 Public Advocates DR SLM-04  
**Company Number:** Cal Adv SLM 04 Q003  
**Date Received:** August 11, 2025  
**Date Response Provided:** August 25, 2025  
**Subject Area:** Total Compensation (CONFIDENTIAL)

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**DATA REQUEST:**

Referring to “Target Total Remuneration” in the Mustich Testimony at 3.

3. Regarding Cal Am’s total remuneration of “based salary, target annual performance compensation, long-term performance compensation programs, and benefits.”

- a. Identify all employees who are eligible for the annual performance compensation program in Column N of Attachment 1.
- b. Identify all employees who are eligible for the long-term performance compensation program in Column O of Attachment 1.
- c. Identify all “benefits” as referenced in the testimony.

**CAL-AM’S RESPONSE**

a-b. Please refer to California American Water’s attachment CAW Response Cal Adv SLM-04 Q003 Attachment 1 CONFIDENTIAL.

c. The benefits included in the RO Model are:

[REDACTED]

**CONFIDENTIAL**

**Response Provided By:** Garry Hofer  
**Title:** VP, Operations  
**Address:** California American Water  
8657 Grand Ave  
Rosemead  
**Cal Adv Request:** A2507003 Public Advocates DR SLM-04  
**Company Number:** Cal Adv SLM 04 Q004  
**Date Received:** August 11, 2025  
**Date Response Provided:** August 25, 2025  
**Subject Area:** Total Compensation

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**DATA REQUEST:**

4. Identify all annual performance compensation performance metrics. Provide supporting documentations.

**CAL-AM'S RESPONSE**

The annual performance plan metrics are as follows:

STRATEGY	GOAL	TARGET	WEIGHT
SAFETY			
PEOPLE			
GROWTH			
CUSTOMERS			

Copies of the 2025 Annual Performance Plan documents for union and non-union employees are attached as CAW Response Cal Adv SLM-04 Q004 Attachment 1 CONFIDENTIAL and CAW Response Cal Adv SLM-04 Q004 Attachment 2 CONFIDENTIAL, respectively.

**Response Provided By:** Garry Hofer  
**Title:** VP, Operations  
**Address:** California American Water  
8657 Grand Ave  
Rosemead  
**Cal Adv Request:** A2507003 Public Advocates DR SLM-04  
**Company Number:** Cal Adv SLM 04 Q005  
**Date Received:** August 11, 2025  
**Date Response Provided:** August 25, 2025  
**Subject Area:** Total Compensation

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**DATA REQUEST:**

5. Identify all long-term performance compensation performance metrics. Provide supporting documentations.

**CAL-AM'S RESPONSE**

As explained by Garry Hofer, the Long-Term Performance Plan includes restricted stock units that are based on time-based vesting only and performance stock units that include the following performance metrics, in addition to time-based vesting: compounded earnings per share growth, relative total shareholder return, and return on equity. A copy of the 2025 Long-Term Performance Plan document is attached as CAW Response Cal Adv SLM-04 Q005 Attachment 1 CONFIDENTIAL.



**Response Provided By:** Joey Chen  
**Title:** Senior Manager Regulatory Services  
**Address:** California American Water  
520 Capitol Mall, Suite 630  
Sacramento  
**Cal Adv Request:** A2507003 Public Advocates DR SLM-04  
**Company Number:** Cal Adv SLM 04 Q006  
**Date Received:** August 11, 2025  
**Date Response Provided:** August 25, 2025  
**Subject Area:** Total Compensation (CONFIDENTIAL)

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**DATA REQUEST:**

6. In Attachment 2 (Total Compensation Breakdown), provide the following information in Columns A through N for all employees identified in response to Q.3.a and Q.3.b., for years 2019 – 2024. Provide the information for Items A through H in the same format as provided in the RO Model's worksheet [Y\_Current Employees WS-A] in workbook [ALL\_CH04\_O&M\_WP\_Labor]. Provide all supporting documents used in response to Q.6.j through Q.6.o and indicate where this recorded information can be found in the RO Model.

- a. District code.
- b. Personnel #.
- c. Job #.
- d. Job title.
- e. Cost center.
- f. Cost center description.
- g. PS Group.
- h. Employee Group.
- i. Year.
- j. Annual Performance Compensation Paid/Earned (\$).
- k. Annual Performance Compensation Unpaid/Unearned (\$).
- l. Long-Term Performance Compensation Paid/Earned (\$).
- m. Long-Term Performance Compensation Unpaid/Unearned (\$).
- n. Base Salary (\$).
- o. Annual benefits (\$).

**CAL-AM'S RESPONSE**

## CONFIDENTIAL

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request to the extent it seeks an analysis, calculation, or compilation that has not previously been performed and is therefore unduly burdensome. California American Water additionally objects to this request on the grounds that any benefit of receiving the information is outweighed by the undue burden and expense of providing that information. California American Water also objects to this request on the grounds it seeks information irrelevant to this proceeding. Subject to, but without waiving, those objections, California American Water responds as follows.

a-i. Please refer to California American Water's attachment CAW Response Cal Adv SLM-04 Q006 Attachment 1 CONFIDENTIAL.

j. Please refer to California American Water's attachment CAW Response Cal Adv SLM-04 Q006 Attachment 1 CONFIDENTIAL.

Please refer to RO Model file  
"ALL\_CH04\_O&M\_RO\_Labor" tab, "Y\_Labor Data Rec WS1" for recorded Annual  
Performance Compensation for year 2020-2024.

k.

l. Please refer to California American Water's attachment CAW Response Cal Adv SLM-04 Q006 Attachment 1 CONFIDENTIAL.

Please refer to RO Model file  
"ALL\_CH04\_O&M\_RO\_Labor" tab, "Y\_Labor Data Rec WS1" for recorded Long-  
Term Performance Compensation for year 2020-2024.

- m. [REDACTED]  
[REDACTED] For additional information on how Long-Term Performance Compensation is earned and paid, please refer to California American Water's attachment CAW Response Cal Adv SLM-04 Q005 Attachment 1CONFIDENTIAL - 2025 LTPP.
- n. Please refer to California American Water's attachment CAW Response Cal Adv SLM-04 Q006 Attachment 1 CONFIDENTIAL. Please refer to RO Model file "ALL\_CH04\_O&M\_RO\_Labor" tab, "Y\_Labor Data Rec WS1" for recorded labor expenses for year 2020-2024.
- o. Please refer to California American Water's attachment CAW Response Cal Adv SLM-04 Q006 Attachment 1 CONFIDENTIAL. Please refer to RO Model file "ALL\_CH04\_O&M\_RO" tab, "Y\_OM Data Rec WS1" for recorded benefits for year 2020-2024.

# Attachment 2-1



COM/MBK/nd3 9/19/2025

**FILED**

09/19/25

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

7:10 PM

A2507003

Application of California-American Water Company (U210W) for Authorization to Increase its Revenues for Water Service by \$63,090,981 or 17.20% in the year 2027, by \$22,067,361 or 5.13% in the year 2028, and by \$26,014,600 or 5.75% in the year 2029.

Application 25-07-003

### **ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING**

This Scoping Memo and Ruling (Scoping Memo) sets forth the issues, need for hearing, schedule, category, and other matters necessary to scope this proceeding pursuant to Public Utilities (Pub. Util.) Code Section 1701.1 and Article 7 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure (Rules).

#### **1. Background**

On July 1, 2025, California-American Water Company (CAW) filed Application 25-07-003 for among other things, to increase its revenues for water and/or wastewater services in each of its districts statewide for Test Year 2027 and Post-Test Years (PTY) 2028 and 2029.

On July 9, 2025, a Motion for Party Status was filed by Monterey Peninsula Water Management District. The motion was granted in the administrative law judge (ALJ) ruling on July 29, 2025.

On July 28, 2025, a Motion for Party Status was by City of Thousand Oaks. The motion was granted in the ALJ ruling on July 29, 2025.

Also on July 28, 2025, the assigned ALJ issued a ruling requiring additional information on revenue requirement models and proposed capital additions.

On August 4, 2025, a Protest to the Application was filed by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates). CAW filed a Reply on August 14, 2025.

On August 26, 2025, California Water Association filed a Motion for Party Status. The motion was granted in an ALJ ruling issued on the same day.

A prehearing conference (PHC) was held on August 29, 2025. At the PHC, the issues, category, need for hearings, procedural schedule, and other procedural matters relating to the proceeding were discussed.

## **2. Scope**

Based on the Application, protests, and discussions during the PHC, the scope of issues to be addressed in this proceeding are as follows:

1. Whether or not CAW's forecast revenue requirements and associated rate and related requests are just and reasonable.

Subtopics under this issue include the reasonableness of the following:

- a. CAW's proposed expense budgets and allocations to and from affiliated interests;
  - b. Ratepayer funding of proposed capital spending;
  - c. Proposed rate base;
  - d. Proposed rate designs;
  - e. Provision of safe and reliable water service; and
  - f. Customer service.
2. Whether the proposed PTY ratemaking for PTY 2028 and 2029 are reasonable.
  3. Whether CAW Special Requests 1 to 2 and 5 to 11 should be approved.

4. Whether the Application supports the goals and objectives of the Commission's Environmental and Social Justice Action Plan.

Pursuant to discussions during the PHC and arguments raised by parties, CAW's Special Requests 3 and 4 for the creation of two memorandum accounts relating to future acquisitions by CAW, are outside the scope of this proceeding.

### **3. Schedule**

The following schedule is adopted but may be modified by the assigned Commissioner or ALJ as required to promote the efficient and fair resolution of these proceedings.

<b>EVENT</b>	<b>DATE</b>
CAW Update filed	Oct 13, 2025
Public Participation Hearings	To be set by a separate ruling
Cal Advocates Testimony served	Jan 23, 2026
Other Intervenor Testimony served	Feb 6, 2026
Rebuttal Testimony Served	Mar 24, 2026
Alternative Dispute Resolution Process	Mar 30 to Apr 20, 2026
Update on Evidentiary Hearings: Provide witness list and cross estimates	Apr 10, 2026
Evidentiary Hearings	Apr 20 to May 1, 2026
Comon Briefing Outline served	May 11, 2026
Settlement Filed (if applicable)	Jun 8, 2026
Opening Briefs	Jun 8, 2026
Reply Briefs	Jun 29, 2026
Comparison Exhibit	Jun 29, 2026
Water Division Technical Conference	Jul 8, 2026
Proposed Decision	Oct 6, 2026
Comments on Proposed Decision	Oct 26, 2026

EVENT	DATE
Reply Comments to Proposed Decision	Nov 2, 2026
Commission Final Decision	Nov-Dec 2026

The proceeding will be submitted upon the filing of Reply Briefs, unless the assigned Commissioner or the ALJ directs further evidence or argument. It is the Commission's intent to complete this proceeding within 18 months of the date this proceeding was initiated. This deadline may be extended by order of the Commission [Pub. Util. Code Section 1701.5(a)].

#### **4. Category of Proceeding and Need for Hearings**

The proceeding was preliminarily categorized as ratesetting, and there were no objections to the category during discussions at the PHC. This ruling affirms that this is a ratesetting proceeding.

Evidentiary hearings are scheduled beginning Monday, April 20, 2026, at 10:00 a.m., at the Commission's Hearing Room, 505 Van Ness Avenue, San Francisco, and continue each weekday until Friday, May 1, 2026 (10 days total).

#### **5. Ex Parte Restrictions**

In a ratesetting proceeding such as this one, *ex parte* communications with the assigned Commissioner, other Commissioners, their advisors, and the ALJ, are restricted and must be reported pursuant to Article 8 of the Commission's Rules.

Cal Advocates requested that the assigned Commissioner prohibit individual oral *ex parte* communications and permit only written *ex parte* communications and all-party meetings. After due consideration, it is determined that Rule 8.2(c)(2) provide sufficient guidelines concerning oral *ex parte* communications and should continue to be applicable in this proceeding.



## **6. Alternative Dispute Resolution Program and Settlements**

The Commission's Alternative Dispute Resolution (ADR) program offers mediation, early neutral evaluation, and facilitation services, and uses ALJs who have been trained as neutrals. At the parties' request, the assigned ALJ can refer this proceeding to the Commission's ADR Coordinator. Additional ADR information is available on the Commission's website.

The Rate Case Plan for Class A Water Utilities requires the appointment of an ALJ neutral to meet with the parties as needed throughout the proceeding. The ALJ neutral and the parties will plan and schedule the specific ADR processes that are appropriate for this proceeding, which may include mediation, early neutral evaluation, or other ADR processes as agreed to by the parties. All active parties must participate in an initial session of ADR and each active party must have an official at such meeting with decision-making authority. For additional information on the Commission's ADR program, see Resolution ALJ 185. Parties are directed to submit their request for an ADR neutral to the Assigned ALJ as soon as practicable to accommodate competing schedules.

The schedule includes a date for the completion of settlement talks and the filing of a motion to adopt a settlement agreement. Any settlements between parties, whether regarding all or some of the issues, shall comply with Article 12 of the Rules and shall be served in writing. Such settlements shall include a complete explanation of the settlement and a complete explanation of why it is reasonable in light of the whole record, consistent with the law, and in the public interest. The proposing parties bear the burden of proof as to whether the settlement should be adopted by the Commission.

## **7. Public Outreach**

Pursuant to Pub. Util. Code Section 1711(a), where feasible and appropriate, before determining the scope of the proceeding, the Commission sought the participation of those likely to be affected, including those likely to derive benefit from, and those potentially subject to, a decision in this proceeding. This matter was noticed on the Commission's daily calendar. Where feasible and appropriate, this matter was incorporated into engagements conducted by the Commission's External Affairs Division with local governments and other interested parties.

Public Participation hearings shall be scheduled in a separate ruling.

## **8. Intervenor Compensation**

Pursuant to Pub. Util. Code Section 1804(a)(1), a customer who intends to seek an award of compensation must file and serve a notice of intent to claim compensation by August 13, 2025, 30 days after the PHC.

## **9. Response to Public Comments**

Parties may, but are not required to, respond to written comments received from the public. Parties may do so by posting such response using the "Add Public Comment" button on the "Public Comment" tab of the online docket card for the proceeding.

## **10. Public Advisor**

Any person interested in participating in this proceeding who is unfamiliar with the Commission's procedures or has questions about the electronic filing procedures is encouraged to obtain more information at <https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/public-advisors-office> or contact the Commission's Public Advisor at 1-866-849-8390 or 1-866-836-7825 (TTY), or send an email to [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov).

## **11. Filing, Service, and Service List**

The official service list has been created and is on the Commission's website. Parties should confirm that their information on the service list is correct and serve notice of any errors on the Commission's Process Office, the service list, and the ALJ. Persons may become a party pursuant to Rule 1.4.

When serving any document, each party must ensure that it is using the current official service list on the Commission's website.

This proceeding will follow the electronic service protocol set forth in Rule 1.10. All parties to this proceeding shall serve documents and pleadings using electronic mail whenever possible, transmitted no later than 5:00 p.m. on the date scheduled for service to occur. Rule 1.10 requires service on the ALJ of both an electronic and a paper copy of filed or served documents.

When serving documents on Commissioners or their personal advisors, whether or not they are on the official service list, parties must only provide electronic service. Parties must not send hard copies of documents to Commissioners or their personal advisors unless specifically instructed to do so.

Persons who are not parties but wish to receive electronic service of documents filed in the proceeding may contact the Process Office at [process\\_office@cpuc.ca.gov](mailto:process_office@cpuc.ca.gov) to request addition to the "Information Only" category of the official service list pursuant to Rule 1.9(f).

The Commission encourages those who seek information-only status on the service list to consider the Commission's subscription service as an alternative. The subscription service sends individual notifications to each subscriber of formal e-filings tendered and accepted by the Commission. Notices sent through subscription service are less likely to be flagged by spam or other

filters. Notifications can be for a specific proceeding, a range of documents and daily or weekly digests.

## **12. Receiving Electronic Service from the Commission**

Parties and other persons on the service list are advised that it is the responsibility of each person or entity on the service list for Commission proceedings to ensure their ability to receive emails from the Commission. Please add “@cpuc.ca.gov” to your email safe sender list and update your email screening practices, settings and filters to ensure receipt of emails from the Commission.

## **13. Assignment of Proceeding**

Commissioner Matthew Baker is the assigned Commissioner and Rafael Lirag is the assigned ALJ for the proceeding.

**IT IS RULED** that:

1. The scope of this proceeding is described above and is adopted.
2. The schedule of the proceeding is set forth above and is adopted.
3. Evidentiary hearings shall be held beginning April 20, 2026, at 10:00 a.m. at the California Public Utilities Commission’s Hearing Room, 505 Van Ness Avenue, San Francisco, and continue each weekday thereafter through May 1, 2026, as needed.
4. The category of the proceeding shall be ratesetting.
5. *Ex parte* rules as set forth in Rules 8.1-8.5 of the California Public Utilities Commission’s Rules of Practice and Procedure and Public Utilities Code Section 1701.3(c) apply.

6. The assigned Commissioner or assigned administrative law judge may modify the schedule, as required to promote the efficient and fair resolution of the proceeding.

This ruling is effective today.

Dated September 19, 2025, at San Francisco, California.

/s/ MATTHEW BAKER

Matthew Baker  
Assigned Commissioner

# Attachment 2-3

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

Application of California-American Water Company (U210W) for Authorization to Increase its Revenues for Water Service by \$63,090,981 or 17.20% in the year 2027, by \$22,067,361 or 5.13% in the year 2028, and by \$26,014,600 or 5.75% in the year 2029.

A.25-07-003  
(Filed July 1, 2025)

**CALIFORNIA-AMERICAN WATER COMPANY'S RESPONSE TO  
PUBLIC ADVOCATES OFFICE'S DATA REQUEST SRA-02**

Cathy Hongola-Baptista  
Nicholas A. Subias  
California American Water  
555 Montgomery Street, Suite 816  
San Francisco, CA 94111  
(415) 293-3023  
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Lori Anne Dolqueist  
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Nossaman LLP  
50 California Street  
34<sup>th</sup> Floor  
San Francisco, CA 94111  
(415) 398-3600  
ldolqueist@nossaman.com

Attorneys for California-American Water Company

Dated: July 31, 2025

California-American Water Company (U-210- W; “California American Water,” “CAW” or the “Company”) hereby sets forth the following objections and responses to Public Advocates Office’s (“Cal Advocates”) Data Request SRA-02 (“Data Requests” or “RPD”), propounded on July 17, 2025, in A.25-07-003.

### **RESERVATION OF RIGHTS**

1. California American Water’s investigation into the Data Requests is ongoing. The Company reserves the right, without obligating itself to do so, to supplement or modify its responses and to present further information and produce additional documents as a result of its ongoing investigation.

2. Any information or materials provided in response to the Data Requests shall be without prejudice to California American Water’s right to object to their admission into evidence or the record in this proceeding, their use as evidence or in the record, or the relevance of such information or materials. In addition, California American Water reserves its right to object to further discovery of documents, other information or materials relating to the same or similar subject matter upon any valid ground or grounds, including without limitation, the proprietary nature of the information, relevance, privilege, work product, overbreadth, burdensomeness, oppressiveness, or incompetence.

### **GENERAL OBJECTIONS**

1. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they purport to impose upon California American Water any obligations broader than those permitted by law.

2. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they improperly seek the disclosure of information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or doctrine, and/or the client confidentiality obligations mandated by Business and Professions Code Section 6068(e)(1) and Rule 3-100(A) of the California Rules of Professional Conduct. Such responses as may hereafter be given shall not include information protected by such privileges or



doctrines, and the inadvertent disclosure of such information shall not be deemed as a waiver of any such privilege or doctrine.

3. California American Water objects to the Data Requests to the extent that the requests are duplicative and overlapping, cumulative of one another, overly broad, and/or seek responses in a manner that is unduly burdensome, unreasonably expensive, oppressive, or excessively time consuming to California American Water.

4. California American Water objects to the Data Requests to the extent they seek documents that are and/or information that is neither relevant nor material to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

5. California American Water objects to the Data Requests to the extent they seek an analysis, calculation, or compilation that has not previously been performed and that California American Water objects to performing.

6. California American Water objects to the Data Requests insofar as they request the production of documents or information that are publicly available or that are equally available to Cal Advocates because such requests subject California American Water to unreasonable and undue annoyance, oppression, burden and expense.

7. California American Water objects to the Data Requests to the extent the requests are vague, ambiguous, use terms that are subject to multiple interpretations but are not properly defined for purposes of the Data Request, or otherwise provide no basis from which California American Water can determine what information is sought.

8. The objections contained herein, and information and documents produced in response hereto, are not intended nor should they be construed to waive California American Water's right to object to the Data Requests, responses or documents produced in response hereto, or the subject matter of such Data Requests, responses or documents, as to their competency, relevancy, materiality, privilege and admissibility as evidence for any purpose, in or at any hearing of this or any other proceeding.

9. The objections contained herein are not intended nor should they be construed to waive California American Water's right to object to other discovery involving or relating to the subject matter of the Data Requests, responses or documents produced in response hereto.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
655 West Broadway #1410  
San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-02  
**Company Number:** Cal Adv SRA-02 Q001  
**Date Received:** July 17, 2025  
**Date Response Provided:** July 31, 2025  
**Subject Area:** ESJ

---

**DATA REQUEST:**

1. The CPUC has created the Environmental and Social Justice (ESJ) Action Plan to serve as a commitment to furthering ESJ principles. Has Cal Am created any programs or measures related to environmental and social justice to date? If so, please provide the details for the programs or measures in a table with the format illustrated below. If Cal Am has not created any programs or measures, please confirm and explain why.

<b><u>ESJ Program/Measure</u></b>	<b><u>Detailed Description of Program/Measure</u></b>

**CAL-AM'S RESPONSE**

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request as irrelevant to the extent it implies obligations for California American Water that do not exist. Subject to, but without waiving, those objections, California American Water responds as follows.

California American Water's programs and progress related to the Commission's Environmental and Social Justice (ESJ) Action Plan have been outlined in Direct Testimony of Patrick Pilz, Section XI.

For an overview, please see below:

<b><u>ESJ Program/Measure</u></b>	<b><u>Detailed Description of Program/Measure</u></b>
Goal 1: consistently integrate equity and access	CPUC goal but California American Water supports many initiatives and programs aimed at helping underrepresented communities

# California-American Water Company

## APPLICATION NO. A.25-07-003 DATA REQUEST RESPONSE

considerations throughout Commission regulatory activities	conduct business with the Company through language service lines, payment assistance, customer assistance programs, direct install programs and several other initiatives proposed as part of this GRC
Goal 2: increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health	As outlined in Section XI. of Mr. Pilz' testimony, the Company is proposing a number of clean energy projects that are further described in testimony of Lacy Carothers. These include battery storage and energy regeneration projects.
Goal 3: strive to improve access to high-quality water, communications, and transportation services for ESJ communities	California American Water offers various customer assistance programs to income qualified customers, ranging from bill discounts to direct install programs, to bill payment assistance.  The Company conducts regular maintenance and repairs in all communities of its infrastructure to secure reliability of high quality water supplies for its customers. The Company is highly focused on providing water that meets all state and federal water quality standards to all of its customers.
Goal 4: increase climate resiliency in ESJ communities	The ESJ Plan goal is mainly energy focused, but California American Water proposes numerous capital projects that may reduce environmental vulnerabilities in ESJ communities
Goal 5: enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the Commission's decision-making process and benefit from Commission programs	California American Water provides most of its customer outreach and customer notices in English and Spanish as well as having a website that has the option between English and Spanish. The Company's Customer Service Center provides a translation language line that live translates into all commonly spoken languages.
Goal 6: enhance enforcement to ensure safety and consumer protection for all, especially for ESJ communities	CPUC goal, not utility goal
Goal 7: promote high road career paths and economic opportunity for residents of ESJ communities	CPUC goal but California American Water has sponsored several organizations who seek to foster professional growth, career advancements and job opportunities for various groups.
Goal 8: improve training and staff development related to environmental and social justice issues within the Commission's jurisdiction	CPUC goal but California American Water implemented various training programs and curriculums mandatory for each employee to build a culture of trust, dignity and respect in the workplace. The Company strongly supports Diversity, Equity and Inclusion initiatives and seeks to build a diverse and inclusive workforce that benefits both the Company and its customers and communities it serves.
Goal 9: monitor the Commission's environmental and social justice efforts to evaluate how they are achieving their objectives	CPUC goal, not utility goal

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

California-American Water Company

APPLICATION NO. A.25-07-003  
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**DATA REQUEST:**

2. Please refer to question 1. For each program or measure listed in response to Question 1, provide additional details such as specific ESJ goals for each initiative in the CPUC's ESJ Action Plan that conforms to each ESJ Program/Measure. Please also provide detailed explanations, including support documents, to substantiate any assumptions on how such projects directly relate to the commissions ESJ's Action Plan. Please provide the information in a table with the format illustrated below.

<b><u>ESJ</u></b> <b><u>Program/Measure</u></b>	<b><u>ESJ Goal</u></b>	<b><u>Detailed Description of How Program/Measure</u></b> <b><u>Conforms with ESJ Goal</u></b>

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The Commission's ESJ Plan is an operating framework to be used by the Commission to integrate environmental and social justice considerations into its work. As indicated in the Commission's work plan to support environmental and social justice, many of these goals are to be achieved through Commission actions, not actions of the entities regulated by the Commission. As outlined in Direct Testimony of Patrick Pilz, Section

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

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**BEFORE THE PUBLIC UTILITIES COMMISSION  
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Cathy Hongola-Baptista  
Nicholas A. Subias  
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cathy.hongola-baptista@amwater.com

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34<sup>th</sup> Floor  
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# California-American Water Company

## APPLICATION NO. A.25-07-003 DATA REQUEST RESPONSE

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California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE



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<b><u>ESJ</u></b> <b><u>Program/Measure</u></b>	<b><u>ESJ Goal</u></b>	<b><u>Detailed Description of How Program/Measure</u></b> <b><u>Conforms with ESJ Goal</u></b>

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The Commission's ESJ Plan is an operating framework to be used by the Commission to integrate environmental and social justice considerations into its work. As indicated in the Commission's work plan to support environmental and social justice, many of these goals are to be achieved through Commission actions, not actions of the entities regulated by the Commission. As outlined in Direct Testimony of Patrick Pilz, Section

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

XI., many of the Company's projects support the Commission's ESJ goals. The details of those projects and how California American Water's actions and proposals support those goals are detailed in Mr. Pilz's testimony.



# Attachment 3-1

# Attachment 3-1

**2025 GENERAL RATE CASE  
WATER QUALITY****MINIMUM DATA REQUIREMENT****General Rate Case Application – Testimony/Results of Operation Requirements****II.G.1 – Compliance with Maximum Contaminant Levels (MCLs)**

The Results of Operation Report must contain information that summarizes any instances of non-compliance with MCLs since the last GRC.

**Response:****San Diego County District**

The San Diego County District has had 1 instances of non-compliance with MCLs since the last GRC.

The San Diego County District had the following instance of non-compliance with primary MCLs:

- The Coronado system had an E. coli-positive repeat sample following a total coliform-positive routine sample

The Coronado system had an isolated event related to hurricane Hillary that moved through the area the week prior to the incident. This caused vulnerabilities in our sample locations near the coastal portion of the district. Corrective actions included installing dedicated sample stations to improve reliability for bacteriological monitoring. CAW also conducted a level 2 hazard assessment in response to the incident.

**Los Angeles County District**

The Los Angeles County District has had zero (0) instances of non-compliance with MCLs since the last GRC.

**Larkfield District**

The Larkfield District has had zero (0) instances of non-compliance with MCLs since the last GRC.

**Monterey County District****Monterey Water System:**

The Monterey County District has had zero (0) instances of non-compliance with primary MCLs since the last GRC.

**2025 GENERAL RATE CASE  
WATER QUALITY**

The Monterey District had the following instances of non-compliance with secondary MCLs:

- The Toro system exceeded recommended levels for Chloride, Total Dissolved Solid (TDS) and Specific Conductance
- The Ambler Park system exceeded TDS and Specific Conductance
- Hidden Hills system exceeded TDS and Specific Conductance

These instances of non-compliance with secondary MCL's are related to their source water quality of the wells and are on-going. While the systems exceeded the recommended level of secondary MCLs, the averages of detections are within the Upper Limit Levels specified in Table 64449-B of Title 22 California Code of Regulations. Therefore, there have been no regulatory compliance actions required by the Division of Drinking Water (DDW).

**Monterey Wastewater District:**

Monterey Wastewater discharge limitations are contained in the Waste Discharge Requirements (WDRs) and Monitoring and Reporting Requirements. Since the last GRC, the quality (the number of discharge limit exceedances) of effluent discharged by Monterey Wastewater systems has improved due to additional facility and treatment process improvements. However, Las Palmas, Pasadena, and Spreckels Wastewater Plants still exceed the WDR levels for Total Dissolved Solids (TDS), Sodium (Na), and Chloride (Cl), as set forth by the Central Coast Regional Water Quality Control Board (RWQCB). Reports are submitted to the RWQCB on a monthly/quarterly/annual basis. It is agreed that the root cause of these exceedances is lack of source control authority for on-site regenerating water softeners and the evaporative concentration taking place in the storage ponds.

**Sacramento**

California American Waters'(CAW) Sacramento District has had zero (0) instances of non-compliance with primary MCLs in active wells since the last GRC.

The Sacramento District had the following instances for non-compliance with secondary MCLs:

- The Lincoln Oaks system had two wells with Running Annual Average (RAA) exceeding SMCL for Iron but due to insignificant use of well, the system was not in violation. The two wells were operational on special schedules and reduction in Iron levels were observed.
- The Coarsegold system has only two wells and the RAA for both wells are in exceedance of SMCL for Iron and Manganese. CAW is in the process of constructing a treatment plant with an estimated completion date in Quarter 4 of 2025.

**2025 GENERAL RATE CASE  
WATER QUALITY**

- The Goldside system has wells with RAA in exceedance of Iron and Manganese. CAW is in the process of constructing a treatment plant with an estimated completion date in Quarter 1 2026.
- The Oakhurst system has one well with RAA in exceedance of Manganese. CAW is in the process of evaluating the best treatment approach. Chloride and Specific Conductance were above the recommended level of SMCL at one treatment plant, but averages of detections are within the Upper Limit specified in Table 64449-B. Thus, no regulatory compliance actions were required by DDW.

**Ventura County District**

The Ventura County District has had zero (0) instances of non-compliance with MCLs since the last GRC.

**2025 GENERAL RATE CASE  
WATER QUALITY**

**MINIMUM DATA REQUIREMENT**

**General Rate Case Application – Testimony/Results of Operation Requirements**

**II.G.2 – Summary of Exceedances of Treatment Techniques or Action Levels**

The Results of Operation Report must contain information that summarizes any instances when Treatment Techniques or Action Levels were exceeded.

**Response:**

**San Diego County District**

The San Diego County District has had 1 instance when Treatment Techniques or Action Levels were exceeded.

**Los Angeles County District**

The Los Angeles County District has had no instances when Treatment Techniques or Action Levels were exceeded.

**Larkfield District**

The Larkfield District has had no instances when Treatment Techniques or Action Levels were exceeded.

**Monterey County District**

**Monterey Water System:**

The Monterey County District has had zero (0) instances of non-compliance with Treatment Techniques or Action Levels.

**Monterey Wastewater System:**

California Division of Drinking Water Treatment Techniques and Action Level items do not apply to wastewater treatment facilities.

**2025 GENERAL RATE CASE  
WATER QUALITY**

**Sacramento District**

The Sacramento District has had zero (0) instances of non-compliance with Treatment Techniques or Action Levels.

**Ventura County District**

The Ventura County District has had no instances when Treatment Techniques or Action Levels were exceeded.

**2025 GENERAL RATE CASE  
WATER QUALITY****MINIMUM DATA REQUIREMENT****General Rate Case Application – Testimony/Results of Operation Requirements****II.G.3 – Summary of Exceedances of Notification Levels or Response Levels**

The Results of Operation Report must contain information that summarizes any instances when Notification Levels or Response Levels were exceeded.

**Response:****San Diego County District**

The San Diego County District has had no instances when Notification Levels or Response Levels were exceeded since the last GRC.

**Los Angeles County District**

The Crownhaven Well in the Duarte System in Los Angeles County District exceeded the Notification Level for 1,4-Dioxane and PFOA since the last GRC. The Santa Fe Well in the Duarte System in Los Angeles County District exceeded the Notification Level for PFOA. The High Capacity Well in the Bellflower System in Los Angeles County District exceeded the Notification Level for PFOS. All required notifications were made to State and local agencies. The district had no other instances where Notification Levels or Response Levels were exceeded since the last GRC.

**Larkfield District**

The Larkfield District has been required to conduct quarterly monitoring for PFAS at one of the source water wells as required by the Division of Drinking Water. One (1) source well had Notification Levels exceeded for PFHxS since the last GRC.

**Monterey County District****Monterey Water System:**

The Monterey County District monitors PFAS chemicals at its source water wells as required by Division of Drinking Water (DDW). The last GRC reported that five of its source wells had PFOA or PFOS detections that exceeded the PFOA/PFOS Notification Levels. There has been no change in the status since



**2025 GENERAL RATE CASE  
WATER QUALITY**

then. The district had no other instances where Notification Levels or Response Levels were exceeded.

On February 5, 2025, California American Water acquired West San Martin Water Works, which will be operated under Cal Am's Monterey District. Monterey District will start to monitor the system as required by DDW and determine if there is any Notification Level or Response Level exceedance in the newly acquired system.

**Monterey Wastewater System:**

The Monterey wastewater operations are not subject to Division of Drinking Water notification or response levels.

**Sacramento District**

Since the last GRC, the Sacramento District has been required to conduct quarterly monitoring for PFAS at selected source water wells required by Division of Drinking Water. In addition to previously reported Nut Plains well, nineteen (19) of its source wells had PFOA, PFHxS and/or PFOS detections that exceeded the PFOA/PFOS/PFHxS Notification Levels. Two (2) sources are equipped with GAC treatment units. One (1) source well had confirmed PFOA detected above Response Levels and this source was taken out of service. Two (2) source wells in Isleton while three (3) source wells in Oakhurst had Boron detections that exceeded the Notification Levels.

**Ventura County District**

The Ventura County District has had no instances when Notification Levels or Response Levels were exceeded since the last GRC.

# Attachment 4-1

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

Application of California-American Water Company (U210W) for Authorization to Increase its Revenues for Water Service by \$63,090,981 or 17.20% in the year 2027, by \$22,067,361 or 5.13% in the year 2028, and by \$26,014,600 or 5.75% in the year 2029.

A.25-07-003  
(Filed July 1, 2025)

**CALIFORNIA-AMERICAN WATER COMPANY'S RESPONSE TO  
PUBLIC ADVOCATES OFFICE'S DATA REQUEST SRA-03**

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Attorneys for California-American Water Company

Dated: August 13, 2025

California-American Water Company (U-210- W; “California American Water,” “CAW” or the “Company”) hereby sets forth the following objections and responses to Public Advocates Office’s (“Cal Advocates”) Data Request SRA-03 (“Data Requests” or “RPD”), propounded on July 31, 2025, in A.25-07-003.

### **RESERVATION OF RIGHTS**

1. California American Water’s investigation into the Data Requests is ongoing. The Company reserves the right, without obligating itself to do so, to supplement or modify its responses and to present further information and produce additional documents as a result of its ongoing investigation.

2. Any information or materials provided in response to the Data Requests shall be without prejudice to California American Water’s right to object to their admission into evidence or the record in this proceeding, their use as evidence or in the record, or the relevance of such information or materials. In addition, California American Water reserves its right to object to further discovery of documents, other information or materials relating to the same or similar subject matter upon any valid ground or grounds, including without limitation, the proprietary nature of the information, relevance, privilege, work product, overbreadth, burdensomeness, oppressiveness, or incompetence.

### **GENERAL OBJECTIONS**

1. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they purport to impose upon California American Water any obligations broader than those permitted by law.

2. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they improperly seek the disclosure of information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or doctrine, and/or the client confidentiality obligations mandated by Business and Professions Code Section 6068(e)(1) and Rule 3-100(A) of the California Rules of Professional Conduct. Such responses as may hereafter be given shall not include information protected by such privileges or

doctrines, and the inadvertent disclosure of such information shall not be deemed as a waiver of any such privilege or doctrine.

3. California American Water objects to the Data Requests to the extent that the requests are duplicative and overlapping, cumulative of one another, overly broad, and/or seek responses in a manner that is unduly burdensome, unreasonably expensive, oppressive, or excessively time consuming to California American Water.

4. California American Water objects to the Data Requests to the extent they seek documents that are and/or information that is neither relevant nor material to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

5. California American Water objects to the Data Requests to the extent they seek an analysis, calculation, or compilation that has not previously been performed and that California American Water objects to performing.

6. California American Water objects to the Data Requests insofar as they request the production of documents or information that are publicly available or that are equally available to Cal Advocates because such requests subject California American Water to unreasonable and undue annoyance, oppression, burden and expense.

7. California American Water objects to the Data Requests to the extent the requests are vague, ambiguous, use terms that are subject to multiple interpretations but are not properly defined for purposes of the Data Request, or otherwise provide no basis from which California American Water can determine what information is sought.

8. The objections contained herein, and information and documents produced in response hereto, are not intended nor should they be construed to waive California American Water's right to object to the Data Requests, responses or documents produced in response hereto, or the subject matter of such Data Requests, responses or documents, as to their competency, relevancy, materiality, privilege and admissibility as evidence for any purpose, in or at any hearing of this or any other proceeding.

9. The objections contained herein are not intended nor should they be construed to waive California American Water's right to object to other discovery involving or relating to the subject matter of the Data Requests, responses or documents produced in response hereto.

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Jonathan Morse  
**Title:** Interim Head of Rates and Regulatory  
**Address:** California American Water  
520 Capitol Mall, Suite 630  
Sacramento  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-03  
**Company Number:** Cal Adv SRA-03 Q001  
**Date Received:** July 31, 2025  
**Date Response Provided:** August 13, 2025  
**Subject Area:** Special Request 10

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**DATA REQUEST:**

1. Please refer to Jonathan Morse's Direct Testimony, pages 14 and 15 (Q&A 28 and 29 related to special request #10), for the following questions. Through special request #10, Cal Am requests to eliminate the Commission's Decision (D.18-07-010) requirement of providing its Monterey District customers with information regarding rates and rate design. Cal Am has been providing the information on webpage, <https://www.amwater.com/caaw/newrates>, including Frequently Asked Questions, various Rate Making Mechanisms affecting the water rates, Current Surcharge Amounts, Bill Calculator, Conservation Programs, and information on How to Read a Water Bill.

1. Page 15 (Lines 15 to 19) of Jonathan's Direct Testimony states customers now have access to updated and more comprehensive statewide resources, such as the "How to Read Your California American Water Bill" webpage and an interactive bill calculator. However, testimony does not provide webpage references.
  - a. Is the testimony reference to "How to Read Your California American Water Bill" on the webpage <https://amwater.com/caaw/resources/PDF/Customer-Service-Billing/california-americanwater-howtoreadyourbill-CAW.pdf>?
  - b. If the answer to question 1.a. is "No", please provide the correct webpage reference.
  - c. Is the testimony reference to the "interactive bill calculator" on the webpage <https://www.amwater.com/caaw/Customer-Service-Billing/Water-Rates/Customer-Bill-Calculator>?
  - d. If the answer to question 1.c. is "No", please provide the correct webpage reference.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**CAL-AM'S RESPONSE**

- a. Yes.
- b. N/A
- c. Yes.
- d. N/A



California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Jonathan Morse  
**Title:** Interim Head of Rates and Regulatory  
**Address:** California American Water  
520 Capitol Mall, Suite 630  
Sacramento  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-03  
**Company Number:** Cal Adv SRA-03 Q002  
**Date Received:** July 31, 2025  
**Date Response Provided:** August 13, 2025  
**Subject Area:** Special Request 10

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**DATA REQUEST:**

2. Page 15 (Lines 19 and 20) of Jonathan’s Direct Testimony states, “these tools cover much of the same information as the Monterey specific site and are regularly maintained.”

- a. What exactly is the testimony referring to when stating “these tools” in the statement?
- b. Please provide the webpage references of the “these tools”, mentioned in the statement.

**CAL-AM’S RESPONSE**

- a. The How to Read Your California American Water Bill webpage and the interactive Bill Calculator
- b. <https://www.amwater.com/caaw/resources/PDF/Customer-Service-Billing/california-americanwater-howtoreadyourbill-CAW.pdf>  
<https://www.amwater.com/caaw/Customer-Service-Billing/Water-Rates/Customer-Bill-Calculator>

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Jonathan Morse  
**Title:** Interim Head of Rates and Regulatory  
**Address:** California American Water  
520 Capitol Mall, Suite 630  
Sacramento  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-03  
**Company Number:** Cal Adv SRA-03 Q003  
**Date Received:** July 31, 2025  
**Date Response Provided:** August 13, 2025  
**Subject Area:** Special Request 10

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**DATA REQUEST:**

3. Page 15 (Lines 15 to 20) of Jonathan’s Direct Testimony claims that Cal Am has provided statewide resources that provide much of the same information as the Monterey specific site.

- a. Please provide the webpage references of the statewide resources that provide information on “key features of the rate design”, as provided in the Monterey Rates Webpage (<https://www.amwater.com/caaw/newrates>).
- b. Please provide the webpage references of the statewide resources that provide information on “components of my rates”, as provided in the Monterey Rates Webpage (<https://www.amwater.com/caaw/newrates>).
- c. Please provide the webpage references of the statewide resources that provide information on various rate making mechanisms (“What ratemaking mechanisms impact my rates?”), as provided in the Monterey Rates Webpage (<https://www.amwater.com/caaw/newrates>).
- d. Please provide the webpage references of the statewide resources that provide information on the current surcharge amounts, as provided in the Monterey Rates Webpage (<https://www.amwater.com/caaw/newrates>).

**CAL-AM’S RESPONSE**

- a. In addition to the How to Read Your California American Water Bill webpage and the interactive Bill Calculator described in Questions 1 and 2 of Cal Adv SRA-03, Tariff schedules provide rates, rate design, components of rates, ratemaking mechanisms, and surcharges applicable to customers.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

Central Division Rate schedules can be found here:

<https://www.amwater.com/caaw/Customer-Service-Billing/Water-Rates/Monterey-District>

Statewide Rate schedules can be found here:

<https://www.amwater.com/caaw/Customer-Service-Billing/Water-Rates/Rates-Tariffs>

- b. See above.
- c. See above.
- d. See above.

# Attachment 4-2

1 and accountability by providing a clear regulatory process for cost recovery, helping to  
2 avoid abrupt rate impacts and allowing for more effective Commission oversight.

3  
4 **E. Special Request #10 –Monterey Rates Webpage.**

5 Q28. Please describe California American Water’s “Monterey Rates” webpage.

6 A28. In A.15-07-019 California American Water put forth several proposals to address supply,  
7 conservation, rationing, financial stability, and rate design issues in the Monterey County  
8 District. These proposals included elimination of the residential allotment system,  
9 lowering Water Revenue Adjustment Mechanism/Modification Cost Balancing Account  
10 balances and implementing an Annual Consumption Adjustment Mechanism (“ACAM”).  
11 In “Phase 3B” of the proceeding California American Water entered into a Settlement  
12 Agreement that included actions to enhance information regarding its tariffs, including  
13 creation of a new webpage to inform Monterey customers of the rate design changes  
14 authorized in the proceeding. D.18-07-010 adopted the Phase 3B Settlement Agreement,  
15 and ordered California American Water to establish:

16  
17 (a) a new website with a new URL, (b) information on the Modified Cost  
18 Balancing Account as well as the Water Revenue Adjustment Mechanism, (c) a  
19 “one-stop shop” experience for customers, (d) an explanation of the principles  
20 that guided the rate design changes, and (e) the website shall remain active  
21 beyond 2017. The information on the website shall communicate, educate and  
22 inform Monterey District customers regarding rates and rate design changes  
23 including, to the extent adopted by the Commission in Phase 3A, appropriate  
24 information on the annual consumption true-up pilot program. California  
25 American Water Company may seek authority in a future general rate case to  
26 deactivate this webpage but absent the grant of such request the webpage shall  
27 remain active. While active, California American Water Company shall review  
28 the content no less often than annually with the Commission’s Office of

Ratepayer Advocates and the Monterey Peninsula Water Management District, and shall make changes when necessary at any time to keep the webpage accurate and current.<sup>3</sup>

In compliance with D.18-07-010, California American Water built and has maintained this webpage through 2025. California American Water reviews the website content with Cal Advocates and the Monterey Peninsula Water Management District annually.<sup>4</sup>

Q29. What is California American Water requesting regarding the Monterey Rates webpage?

A29. California American Water is requesting to deactivate the Monterey Rates webpage as part of this General Rate Case. The webpage was originally created as a “one-stop shop” to help Monterey customers understand their rate design, including mechanisms like the WRAM/MCBA, following the adoption of D.18-07-010 and the Phase 3B Settlement.

However, customers now have access to updated and more comprehensive statewide resources, such as the “How to Read Your California American Water Bill” webpage—which explains rate components and surcharges using a sample bill—and an interactive Bill Calculator that allows customers to estimate their bills based on service area, meter size, and usage. These tools cover much of the same information as the Monterey-specific site and are regularly maintained.

Since the Monterey rate design has been in place for over eight years and customers can now rely on statewide tools for accurate and current billing information, maintaining a separate, potentially redundant Monterey-specific webpage is no longer necessary.

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<sup>3</sup> D.18-07-010, Decision Adopting Phase 3B Settlement Agreement Ordering Paragraph 3 at 46.

<sup>4</sup> Current website: <https://www.amwater.com/caaw/newrates>

# Attachment 5-1

1 Company's various service areas to help promote the programs and facilitate customers'  
2 enrollment.

3  
4 **IV. MULTI FAMILY LOW INCOME PILOTS & SPECIAL REQUEST 11 –MULTI**  
5 **FAMILY LOW INCOME PILOT PROGRAM EXTENSION AND EXPANSION**

6 Q9. Please describe California American Water's two Low Income Multi Family Pilots  
7 approved in Resolution W-5241<sup>2</sup> and through Advice Letter 1320.

8 A9. Resolution W-5241 approved two low income Multi-family pilots, referred to as  
9 Component 1 and Component 4, of a total of four different Company-proposed pilots.

10  
11 Component 1 is a pilot where California American Water identified a master metered  
12 property within a disadvantaged or severely disadvantaged community in its San Diego  
13 service area and establish a partnership with a non-profit third party to provide Customer  
14 Assistance Program ("CAP") discounts to tenants. Since these tenants are not direct  
15 California American Water customers but pay their water bill to the master meter account  
16 holder or management company of the building, the eligible low-income tenants would  
17 be identified using data from the low-income data share program with the energy utilities.  
18 This is possible in buildings where tenants are sub-metered for gas and/or electricity but  
19 not for water service.

20  
21 Component 4 expanded the Company's existing water-energy single family low income  
22 retrofit program to multifamily buildings and mobile home parks where low-income  
23 renters do not pay a water bill directly to California American Water. The program is an  
24 extension of existing water energy retrofit programs where the participating energy utility  
25 covers the cost of hot water measures such as water heater, showerhead and washing  
26

27  
28 

---

<sup>2</sup> See Attachment 1 – Resolution W-5241.



1 machine upgrades with the water utility covering cold water measure costs such as toilet  
2 upgrades, aerators and leak repairs

3  
4 California American Water designed this pilot, with a budget of \$200,000, to primarily  
5 reach master-metered water utility customers, a segment typically unable to participate in  
6 resource programs due to the indirect relationship that exists between the water utility  
7 and residents of multifamily or mobile home units. Serving smaller, recently acquired  
8 districts including Dunnigan, Fruitridge, Hillview and Meadowbrook, this pilot program  
9 focused on providing equitable, cost-effective services to help master-metered customers  
10 reduce their water consumption.

11  
12 Q10. Please describe the progress made to date on Program Component 1.

13 A10. The Component 1 program, called the Multi-Family Assistance Pilot Program (“MAPP”),  
14 was implemented in mid- 2023 in the San Diego district’s Imperial Beach service area.  
15 The non-profit organization Dollar Energy was chosen to assist with the administration of  
16 enrolling eligible participants and providing the check payments to these tenants. Two  
17 low-income mobile home park sites in Imperial Beach were chosen and data was  
18 analyzed for these two sites using the low-income data share files provided from San  
19 Diego Gas and Electric (“SDGE”) to identify possible participants. Due to tenant units  
20 on both mobile home park sites being sub-metered by SDGE, California American Water  
21 was able to identify tenant names and addresses from the data sharing file. The site  
22 locations were inspected in person by California American Water program staff and the  
23 MAPP program was communicated to the management staff of each site.

24  
25 A dedicated website and email address was created and outreach material designed and  
26 printed in Spanish and English. Dollar Energy prepared a marketing campaign for the  
27 tenants and was assisted through California American Water’s local marketing efforts.  
28 For the initial campaign, 51 eligible mobile home park tenants were identified and

1 targeted for the pilot. The outreach consisted of 2 mailing campaigns of postcards, fliers  
2 and phone calls where possible.

3  
4 To calculate the tenants' quarterly CAP credit, average household usage was calculated  
5 for the area and the corresponding CAP credit determined. The program was designed to  
6 be an opt-in program, to confirm accuracy of tenant information; however, all customers  
7 were pre-approved and no additional burden for program participation existed. Despite  
8 this, only 17 tenants opted in during the initial campaign for the first payment. 30 tenants  
9 opted to not respond to the mail campaign and 4 tenants' mailers returned as non-  
10 deliverable. The quarterly payment amount for each tenant was \$45.48. California  
11 American Water and Dollar Energy expanded the marketing campaign during the  
12 subsequent three quarterly payment campaigns and participation increased somewhat to a  
13 peak participation of 24 of 51 eligible tenants.

14  
15 California American Water has since decided to expand the pilot to include all other  
16 eligible multi-family property sites in the San Diego service area. Expanding the pilot to  
17 all eligible multi-family properties in the San Diego area amounts to 984 additional  
18 eligible tenants. To increase participation levels and overcome program credibility issues  
19 with tenants, California American Water is partnering with a local diverse and woman  
20 owned organization to do direct outreach to those eligible tenants via phone in Spanish  
21 and English. This is in addition to the mail marketing piece and the local "boots on the  
22 ground" marketing efforts at these facilities. Currently letters are being mailed out to  
23 these additional eligible tenants to create awareness of the program before the phone  
24 outreach in English and Spanish takes place.

25  
26 Q11. Please describe the progress made to date on Program Component 4.

27 A11. To initiate this pilot, California American Water engaged with Richard Heath Associates  
28 ("RHA") and launched the pilot in late August 2023. Local program contractors

1 encountered challenges finding qualified sites in these smaller water districts. The  
2 number of sites was limited and some properties could not be qualified at the site-level  
3 due to either mixed income levels of residents or a lack of willingness by property  
4 managers to verify residents' incomes. Program contractors also encountered credibility  
5 gaps from tenants due to a lack of recognition of who provided their water. Further  
6 complicating the qualification process, securing property owner waivers from property  
7 owners who were not located onsite but resided in other cities and/or out of state proved  
8 to be exceedingly time consuming and difficult. In cases where property owner waivers  
9 were approved, there were incidents of customers being unwilling to allow program staff  
10 to access their units to provide program services.

11  
12 To facilitate the enrollment process and motivate property managers and owners to  
13 participate, California American Water conservation staff from Sacramento and RHA  
14 scheduled ride-alongs together and visited identified properties to secure possible sites  
15 for retrofits. This proved to be very time-consuming but yielded increased interest in the  
16 program and facilitated initiating conversations with property managers and in some  
17 cases with property owners. This led to an enhanced property owner engagement  
18 strategy in late 2024. California American Water, RHA and program contractors  
19 engaged in joint outreach aimed at decreasing credibility gaps and helping property  
20 owners to approve whole-property treatment plans.

21  
22 In late 2024, a 50-unit multi-family property in California American Water's Hillview  
23 (Oakhurst) service area was identified and the process started to obtain the required  
24 approvals from property managers and tenants for a whole building retrofit. Two  
25 additional properties in Oakhurst, a multi-family unit and a mobile home park, are also  
26 targeted for retrofits and tenant presentations conducted jointly by RHA and California  
27 American Water conservation staff took place in May.  
28

Q12. Please describe California American Water's request in Special Request #11.

A12. Special Request #11 seeks permission to extend the two Multi Family Low Income Pilot Programs discussed above. Ordering Paragraph 12 of Resolution W-5241 states: "In the General Rate Case proceeding expected to be filed in July 2025, continuation of the pilot program shall be determined." The Company requests the extension of both programs, Component 1 and Component 4, through the filing of the Company's next rate case in 2028. Additionally, the Company proposes an expansion of Component 1, the Multi-Family Assistance Pilot Program ("MAPP") to its Monterey service area. Monterey's water supply challenges coupled with high living expenses and sizable low-income population makes water affordability an important concern for low-income households. California American Water proposes to assist tenants of multifamily housing by affording similar benefits of rate relief as provided to direct California American Water customers. Despite the challenges the Company experienced with this pilot in its Imperial Beach area, the Company believes in the feasibility of the approach it took with this pilot. Expanding it, however, will require improvements to the very manual process of identifying tenants and more effectively targeting them to enroll into the program. The Company hopes that ultimately this pilot could serve as case study on how to resolve the long standing challenge of providing benefits to tenants in master metered settings. An additional benefit from using the low income datashare program with the energy utilities in this pilot might be additional collaboration with these utilities on serving low income customers, a collaboration California American Water has been actively pursuing for years with its long standing Water/Energy low income direct install program. This collaboration reduces program overlap between water and energy utilities and provides the biggest benefit to customers in the form of a single comprehensive assistance program.

As stated, this Special Request would expand the initial pilot to all eligible multi-family properties in the Company's San Diego and Monterey service areas. The Company

would utilize data shared through the quarterly low income data sharing program with Pacific Gas and Electric to identify electricity or gas sub-metered tenants in Monterey.

Q13. What does California American Water propose in regard to continuation of the two Low Income Multi-family pilots?

A13. California American Water proposes to continue both Multi-family pilots for this ratecase period and proposes an expansion of the MAPP pilot to the Company's Monterey service area.

## **V. CUSTOMER ASSISTANCE PROGRAM CAP**

Q14. Please describe California American Water's CAP including its internal administration.

A14. California American Water's CAP provides a 25% discount on the service charge as well as the quantity rate for tiers 1 and 2 in all water service areas except for Monterey. For Monterey, the discount is 35% and applies to service charge and consumption in rate tiers 1 through 3 to account for Monterey's unique steeply inclining conservation rate design. The Monterey Wastewater service area is comprised of Active and Passive systems; Active Monterey Wastewater CAP customers receive a 35% discount on their flat rate while Monterey Passive CAP customers receive a 25% discount on their flat rate.

California American Water was the first Commission-regulated water utility to offer a low-income program. The CAP provides one of the most generous discounts to customers. Providing the discount only to the lower rate tiers provides affordability for mostly indoor, essential water usage. The CAP is customer-funded through a statewide consolidated low-income surcharge that ensures areas with larger low-income populations are not disproportionately burdened by the cost of the program. Statewide consolidation of this program benefits all customers through equitable and fair cost-sharing and distribution of the program. Customers can enroll in the program by completing a simple online application form without the need to print or mail a form.

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

Application of California-American Water Company (U210W) for Authorization to Increase its Revenues for Water Service by \$63,090,981 or 17.20% in the year 2027, by \$22,067,361 or 5.13% in the year 2028, and by \$26,014,600 or 5.75% in the year 2029.

A.25-07-003  
(Filed July 1, 2025)

**CALIFORNIA-AMERICAN WATER COMPANY'S RESPONSE TO  
PUBLIC ADVOCATES OFFICE'S DATA REQUEST SRA-06**

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Attorneys for California-American Water Company

Dated: October 30, 2025

California-American Water Company (U-210- W; “California American Water,” “CAW” or the “Company”) hereby sets forth the following objections and responses to Public Advocates Office’s (“Cal Advocates”) Data Request SRA-06 (“Data Requests” or “RPD”), propounded on October 16, 2025, in A.25-07-003.

### **RESERVATION OF RIGHTS**

1. California American Water’s investigation into the Data Requests is ongoing. The Company reserves the right, without obligating itself to do so, to supplement or modify its responses and to present further information and produce additional documents as a result of its ongoing investigation.

2. Any information or materials provided in response to the Data Requests shall be without prejudice to California American Water’s right to object to their admission into evidence or the record in this proceeding, their use as evidence or in the record, or the relevance of such information or materials. In addition, California American Water reserves its right to object to further discovery of documents, other information or materials relating to the same or similar subject matter upon any valid ground or grounds, including without limitation, the proprietary nature of the information, relevance, privilege, work product, overbreadth, burdensomeness, oppressiveness, or incompetence.

### **GENERAL OBJECTIONS**

1. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they purport to impose upon California American Water any obligations broader than those permitted by law.

2. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they improperly seek the disclosure of information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or doctrine, and/or the client confidentiality obligations mandated by Business and Professions Code Section 6068(e)(1) and Rule 3-100(A) of the California Rules of Professional Conduct. Such responses as may hereafter be given shall not include information protected by such privileges or

doctrines, and the inadvertent disclosure of such information shall not be deemed as a waiver of any such privilege or doctrine.

3. California American Water objects to the Data Requests to the extent that the requests are duplicative and overlapping, cumulative of one another, overly broad, and/or seek responses in a manner that is unduly burdensome, unreasonably expensive, oppressive, or excessively time consuming to California American Water.

4. California American Water objects to the Data Requests to the extent they seek documents that are and/or information that is neither relevant nor material to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

5. California American Water objects to the Data Requests to the extent they seek an analysis, calculation, or compilation that has not previously been performed and that California American Water objects to performing.

6. California American Water objects to the Data Requests insofar as they request the production of documents or information that are publicly available or that are equally available to Cal Advocates because such requests subject California American Water to unreasonable and undue annoyance, oppression, burden and expense.

7. California American Water objects to the Data Requests to the extent the requests are vague, ambiguous, use terms that are subject to multiple interpretations but are not properly defined for purposes of the Data Request, or otherwise provide no basis from which California American Water can determine what information is sought.

8. The objections contained herein, and information and documents produced in response hereto, are not intended nor should they be construed to waive California American Water's right to object to the Data Requests, responses or documents produced in response hereto, or the subject matter of such Data Requests, responses or documents, as to their competency, relevancy, materiality, privilege and admissibility as evidence for any purpose, in or at any hearing of this or any other proceeding.



9. The objections contained herein are not intended nor should they be construed to waive California American Water's right to object to other discovery involving or relating to the subject matter of the Data Requests, responses or documents produced in response hereto.

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
655 West Broadway #1410  
San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-06  
**Company Number:** Cal Adv SRA-06 Q001  
**Date Received:** October 16, 2025  
**Date Response Provided:** October 30, 2025  
**Subject Area:** Special Request 11 Multi Family Low Income Pilots

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**DATA REQUEST:**

1. Referring to the Direct Testimony of Patrick Pilz (Pilz Testimony), please provide the following information regarding Components 1 and 4 of The Multi Family Assistance Pilots.

- a) On page 11, lines 15-16 of the Pilz Testimony, Cal Am claims expanding the program “will require improvements to the very manual process of identifying tenants and more effectively targeting them to enroll into the program.” Please provide current expense of Component 1 and 4’s manual process since program’s inception and future estimate of required improvements.
  - i. Please provide any costs to be incurred to improve the very manual process of the two low income Multi-family pilots and its extension into the Monterey Service area.
  - ii. If customer participation challenges at Imperial Beach are still being resolved, how will extension to the Monterey Service Area improve customer participation?
- b) On page 11, lines 17-18 of the Pilz Testimony, Cal Am claims “this pilot program could serve as a case study on how to resolve the long-standing challenge of providing benefits to tenants in master metered settings.” Before the implementation of Components 1 and 4, did Cal Am conduct a cost benefit analysis or any research evaluating its potential effectiveness, especially in addressing the longstanding challenges faced by tenants in master-metered buildings? Please answer yes or no.
  - i. If the answer is yes, please provide supporting documentation of such analysis or research.

- ii. What specific metrics or outcomes did Cal Am evaluate before implementing components 1 and 4 to determine whether expansion was warranted? Please provide supporting documentation.
- iii. Did Cal Am complete a cost benefit analysis of such programs or compare the approach to alternative methods of delivering benefits to tenants? If the answer is yes, please provide supporting documentation.
- iv. On program replication to the Monterey Service Area, did Cal Am complete an evaluation of the program's performance? If the answer is yes, please provide supporting documentation.
- c) Refer to page 8, lines 4-7. Cal Am states the pilot was designed with a budget of \$200,000. Please provide how much of the \$200,000 budget was spent on overhead vs. direct benefits to customers.
  - i. Please provide what portion of funds from the \$200,000 went to third-party administrators like dollar Energy or the RHA. Please provide supporting documentation.

### **CAL-AM'S RESPONSE**

a) The Direct Testimony of Patrick Pilz, page 11, lines 15-16, references the Multi-Family Assistance Pilot Program or MAPP, program Component 1, and its proposed expansion to the Company's Monterey service area. The described "very manual process" refers to labor hours internally needed to sort through data and identify eligible customers, identify average usage and calculate a credit amount among other components. There is no direct cost other than internal labor hours involved at this point.

As far as enrolling eligible properties for the Multifamily-Mobile Home Water Coordination Program Pilot, program Component 4, the Direct Testimony of Patrick Pilz describes some Company efforts to facilitate enrollment on page 10, lines 12 through 20, through joint ride-alongs with RHA and California American Water staff visiting eligible properties to convince property owners and managers of the validity of the program and talking through the program details. Again, here as well, the contractor, RHA, is not billing California American Water for this time so the "costs" are primarily internal labor costs.

Any automation applied to lessen the manual process would be completed with support from American Water's internal IT and SAP technology teams. So, no external costs are anticipated to be incurred at this point.

As mentioned in the Direct Testimony of Patrick Pilz, Q/A 10, page 9, line 18-22, California American Water has hired a small local marketing firm specialized in customer assistance programs that has helped with San Diego Gas & Electric's CARE program enrollment to market the MAPP program to eligible tenants through direct phone calls, site visits and other options. This effort is currently underway and should it prove valuable and yield a meaningful increase in participation, a similar campaign would be considered for Monterey's expansion.

b. California American Water objects to this question on the grounds that it is vague and ambiguous, particularly in light of the history of, and the efforts undertaken to launch, these two pilot programs, and thus this question cannot be answered with a simple "Yes" or "No" response. As stated in the Direct Testimony of Patrick Pilz, Q/A 9, Page 7, Resolution W-5241 ordered California American Water to implement these two pilot programs, which were proposed in Advice Letter 1320. Prior to filing Advice Letter 1320, in January 2019, California American Water filed Advice Letter 1221 seeking authorization to extend the CAP discount to certain low-income family housing properties. Prior to filing Advice Letter 1221, California American Water sought support for different ideas to assist tenants behind master metered multi-family housing units, including rate design changes and CAP program term changes. These outreach efforts also included a meeting with CPUC Commissioner staff and the owners of a large low-income housing facility in Monterey. Advice Letter 1221 was ultimately rejected by the Commission and led to the filing of Advice Letter 1320.

In regards to the Component 4 pilot, California American Water has extensive experience with a unique low income direct install program in partnership with the Energy Utilities' CARE assistance program for residential customers. California American Water was the first Utility to pioneer this unique Water/Energy Joint program which has since been initiated by several other water utilities throughout the state. The Component 4 pilot has simply taken the successful direct install program already in place and is expanding it to multi-family housing units.

In summary, California American Water has extensive experience on how to best assist indirect tenant customers based on the past several years pioneering different approaches. At the same time, it is premature to evaluate pilot performance because the Company is currently in the active process of expanding its San Diego pilot to all San Diego eligible properties. The expansion to Monterey would not occur until after resolution and implementation of this general rate case proceeding, which will not happen until 2027 or later.

c. The Direct Testimony of Patrick Pilz, page 8, lines 4-7, references Pilot Component 4 with contractor RHA. This pilot is ongoing with two multi-family housing complexes currently being retrofitted. The Company has not been fully invoiced yet for the work currently ongoing. However, out of the \$200,000 budgeted for the Component 4 pilot, \$29,948 or 15% is allocated towards overhead and other costs, 85% is allocated for direct customer benefits.

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

**Response Provided By:** Patrick Pilz  
**Title:** Senior Manager Field Operations  
**Address:** California American Water  
655 West Broadway #1410  
San Diego  
**Cal Adv Request:** A2507003 Public Advocates DR SRA-06  
**Company Number:** Cal Adv SRA-06 Q002  
**Date Received:** October 16, 2025  
**Date Response Provided:** October 30, 2025  
**Subject Area:** Special Request 11 Multi Family Low Income Pilots

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**DATA REQUEST:**

1. Using the table provided below, please provide data of Component 1 and 4 detailing program costs and historical number of customer participation, eligible, noneligible and enrolled.

Year	Program Name	Cost Per household	# of Customers Participated	Eligible Customers	Noneligible Customers	Enrolled
2023	Component 1:	\$XX.XX	XX	XX	XX	XX
2024	Component 1:	\$XX.XX	XX	XX	XX	XX
2025	Component 1:	\$XX.XX	XX	XX	XX	XX
2023	Component 4	\$XX.XX	XX	XX	XX	XX
2024	Component 4	\$XX.XX	XX	XX	XX	XX
2025	Component 4	\$XX.XX	XX	XX	XX	XX

- a) Please provide a detailed breakdown of the cost per component. Please Provide the response in Excel format.
- i. Please provide detailed support to substantiate Cal Am's responses above. This includes but is not limited to internal communications and

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

memorandums, vendor quotes and estimates, engineering reports and calculations. Please provide any calculations in Microsoft Excel format with links and formulas intact.

- ii. Please provide any MOU's, agreements or joint marketing plans Cal Am has in place for component 1 and 4.
- iii. Please provide the cost per participant for component 1 and component 4.
- iv. Please provide detailed support to substantiate for the names and addresses of enrolled customers from the years 2023-2025.
- v. What evidence does Cal Am have to enhance outreach via mail, phone, or boots on the ground that will significantly improve participation into the Monterey Service Area. Please provide supporting documentation.
- vi. If enrollment remains stagnant or cost per beneficiary remains high, at what point would Cal Am consider terminating or restructuring the program.

**CAL-AM'S RESPONSE**

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request to the extent it seeks an analysis, calculation, or compilation that has not previously been performed and is therefore unduly burdensome. California American Water additionally objects on the grounds that the request is overbroad and is therefore unduly burdensome. Subject to, but without waiving, those objections, California American Water responds as follows.

The Multifamily-Mobile Home Water Coordination Program Pilot and the Multi-Family Assistance Pilot Program are ongoing pilot programs. It is premature and would be mere speculation to provide some of the information requested in this data request. As a result, California American Water has not considered terminating or restructuring either pilot program.

For the Multi-Family Assistance Pilot Program (Component 1), please see Please see California American Water's response to Cal Adv HMC-04, Question 0001, including Attachments 1 and 2. Current enrollment as of October is approximately 350 participants in the San Diego service area. Enrollment is ongoing, with Dollar Energy currently and actively enrolling customers. Please see CAW Response Cal Adv SRA-06 Q002 Attachment 1 CONFIDENTIAL for RHA's scope of work and fee schedule.

The Multifamily-Mobile Home Water Coordination Program Pilot (Component 4) is ongoing. Since inception of the program several ways to overcome barriers had to be

California-American Water Company

APPLICATION NO. A.25-07-003  
DATA REQUEST RESPONSE

learned to improve program participation, one of which was changing the enrollment subcontractor. After utilizing local contractors (working on the Pacific Gas and Electric (PG&E) Energy Savings Assistance (ESA) Program) with California American Water and RHA staff to conduct outreach with somewhat limited success, the program tried an alternative approach in Q1 of 2025. Engaging a contractor (working on the PG&E ESA Program) with statewide relationships with multifamily property owners resulted in increased interest for whole-property enrollments of the pilot. Two multifamily properties in the Fruitridge and Sacramento area are currently receiving program services. Three additional multifamily properties are interested in receiving program services in the first quarter of 2026. California American Water has not been fully invoiced yet for the currently ongoing retrofits. Outreach is underway to properties in other markets. It is anticipated that all pilot funds for Component 4 will be utilized by the end of the second quarter of 2026.

California American Water has offered and successfully conducted a multitude of water efficiency programs for almost two decades across its service areas and has used all commonly employed marketing channels to promote these programs. The experience gained over the years in successfully implementing these programs forms the basis of the Company's suggested outreach approaches for these pilot programs. Additionally, for the MAPP project, it was started as a mail campaign where customers would return a postcard for enrollment. With the expansion to all San Diego areas, a website was created for customers to respond, and the response rate has significantly improved. This is further evidence that even an incremental program design change makes a difference.