Docket	:	A.25-07-003
Exhibit Number	:	Cal Adv - #
Commissioner	:	Matthew Baker
Administrative Law Judge	:	Rafael L. Lirag
Public Advocates Office Witness(es)	:	Justin Menda

PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

PUBLIC

REPORT ON NORTHERN DIVISION PLANT

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

San Francisco, California
January 23, 2026

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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 Mr. Justin Menda. 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 1 PLANT – SACRAMENTO

I. INTRODUCTION

This chapter addresses Cal Am's over forecast capital budgets, capital budgets for unnecessary projects, and repeated funding requests for certain projects in the Sacramento district. Cal Am's Northern Division consists of the Sacramento District and Larkfield District. Chapter 2 of this Report provides further discussion of the Larkfield District's capital budget.

Cal Am's Sacramento District is comprised of the following water systems: Antelope, Arden, Dunnigan, Isleton, Lincoln Oaks, Meadowbrook, Parkway, Suburban Rosemont, Security Park, Walnut Grove, West Placer, Fruitridge Vista ("Fruitridge"), Hillview, and Bass Lake.[1] The Sacramento District is supplied through a combination of groundwater wells and purchased water.[2]

Cal Am has actively pursued the acquisition of other water systems to incorporate into its existing districts, including the Sacramento District. Cal Am acquired the Fruitridge and the Hillview systems in 2020.[3] In Decision (D.)23-04-007, the Commission approved Cal Am's request to acquire the Bass Lake Water Company.[4]

Cal Advocates reviewed Cal Am's testimony, application, workpapers, minimum data requirements, Comprehensive Planning Study ("CPS"), capital budget estimates, and responses to Cal Advocates' data requests. In addition, Cal Advocates conducted a field investigation of the Sacramento District's water systems on September 3, 2025.

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[1] *Application of California-American Water Company (U210W) to Increase Revenues in Each of its Districts Statewide*, Direct Testimony of Garry Hofer at 3.

[2] Direct Testimony of Garry Hofer at 4-6, 7.

[3] Direct Testimony of Garry Hofer at 6; A.22-07-001, *Application of California-American Water Company (U210w) to Increase Revenues in Each of its Districts Statewide*, Direct Testimony of Garry Hofer at 6-7.

[4] Direct Testimony of Garry Hofer at 3; Cal Am filed A.22-03-002 in 2022 to acquire the Bass Lake Water Company.

II. SUMMARY OF RECOMMENDATIONS

The Commission should reduce or remove Cal Am's request for individual proposed project budgets for rate making purposes, as follows:

The Commission should reduce the proposed budget for the Northern (NOR)-Well Rehabilitation Program (I15-600123) from $8,321,000 to $2,072,000 for 2027-2028, since the proposed improvements for the 2027-2028 period amount to only $2,072,000.

The Commission should reduce the proposed budget for the Storage Tank Improvement Program (I15-600128) from $1,308,000 to $1,261,311 for 2027-2028 as one of the individual tank rehabilitation projects is not necessary, the project scope for another tank rehabilitation project is unknown, and the "contingency item" costs should be removed from the tank rehabilitation costs.

The Commission should exclude funding for the Northern Energy Storage Grid Resilience and Innovation Partnerships Program (GRIP) project (I15-600120) due to the availability of grant funding.

The Commission should reduce Cal Am's proposed project budget for the Dunnigan Wastewater (WW) Improvements (I15-620003) project from $2,980,000 to $2,680,000 since an electrical service was already installed as part of a previously approved project at the treatment facility.

The Commission should exclude funding for the CA-California Corporate Office project (I15-010003-02) as discussed further in Cal Advocates' Report on Construction Work In Progress, Southern Division and Corporate Capital Projects regarding the proposed California Corporate Office.[5]

The Commission should reduce the proposed budget for the NOR-Standby Generator Improvement Program (I15-600125) from $2,852,000 to $937,000 for 2027-2028 since one of the proposed project candidates is not needed.

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[5] Testimony of Sari Ibrahim, Report on the Construction Work In Progress, Southern Division and Corporate Capital Projects, Chapter 5.

The Commission should reduce project budget for the Northern Well Treatment/NOR per- and polyfluoroalkyl substances (PFAS) Treatment project (I15-600118) from $7,798,107 to $3,347,107 because the arsenic level at Quail Meadows Well 2 is below the maximum contaminant level (MCL).

The Commission should reduce the proposed budget for the NOR -Well Installation and Replacement Program (I15-600122) from $8,321,000 to $6,136,596 for 2027-2028 based on Cal Am's historic expenditure under this program.

The Commission should reduce the proposed budget for the NOR-Main Replacement Program (I15-600121) from $23,622,000 to $10,273,505 for 2027-2028 based on the amount of pipeline Cal Am has historically installed under this program.[6]

Recommendations on plant budgets also reflect Cal Advocates' recommendations regarding previously funded projects that are expected to be completed in 2027 or later. The Commission should not allow Cal Am to include projects in rates that have been previously funded by ratepayers but are not completed. These projects should not be included in rates again until the projects are completed, in service, and provide benefits to ratepayers. Cal Am may seek recovery of the project costs when it files its next general rate case application (in 2028).

Attachment 1-2 presents Cal Advocates' project-specific adjustments. Table 1-1 below presents the summary of Cal Advocates' recommended budget and compares it with Cal Am's requested budget.[7]

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[6] The Commission should adopt a budget of $3,969,012 in 2027 and $6,304,493 in 2028 for I15-600121.

[7] Attachment 1-2: Capital Budget Details – Sacramento District.

Table 1-1: Capital Budget Summary – Sacramento District[8]

Sacramento ($000)	2027	2028	Annual Average
Public Advocates Office Recommendation	$16,619.50	$24,451.59	$ 20,535.55
Cal Am's Proposed	$41,412.14	$62,509.84	$ 51,960.99
Cal Am> Public Advocates Office	$24,792.64	$38,058.25	$ 31,425.45
Public Advocates Office as % of Cal Am	40%	39%	40%

III. ANALYSIS

Unless otherwise stated, the project budgets listed and discussed below are direct project costs. Direct project budgets are the project budgets without add-ons such as overhead.

A. Proposed Projects

1. NOR-Well Rehabilitation Program (I15-600123)

The Commission should reduce Cal Am's requested budget from $8,321,000 to $2,072,000 for 2027-2028[9] since the proposed improvements for the 2027-2028 period only equate to $2,072,000. Cal Am requests funding to rehabilitate its existing wells and replace two hydro-pneumatic tanks per year.[10]

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[8] *Application of California-American Water Company (U210W) to Increase Revenues in Each of its Districts Statewide*, Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5;" Attachment 1-2: Capital Budget Details – Sacramento District.

[9] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5." Attachment 1-3: I15-600123 Cost Estimate.

[10] *Application of California-American Water Company (U210W) to Increase Revenues in Each of its Districts Statewide*, Cal Am Engineering Workpaper I15-600122, I15-600123_NOR Wells" at 1-11.

Cal Am plans on rehabilitating eight wells and replacing six hydro-pneumatic tanks during this rate case cycle.[11] Cal Am estimates the cost of these improvements is $3,744,000,[12] which is less than what Cal Am requests in 2028 alone for I15-600123.[13] Furthermore, in the 2027-2028 period, Cal Am requests well rehabilitation for four wells and to replace four hydro-pneumatic tanks.[14] Cal Am estimates the cost to rehabilitate four wells and replace four hydro-pneumatic tanks is $2,072,000 for the 2027-2028 period based on its cost estimate.[15] Cal Am should be granted funding only for projects that it plans to complete during the 2027-2028 period. Therefore, the Commission should only allow $2,072,000 for the 2027-2028 period for I15-600123.[16]

In addition, Cal Am is unable to complete the well rehabilitation projects as scheduled. In the NOR-Well Rehabilitation Program for the 2024-2026 period (I15-600114), Cal Am unable to complete the well rehabilitation projects within the last rate case cycle. Cal Am states that seventeen wells were assessed for rehabilitation work under this program during the 2024-2026 period.[17] Cal Am states that four of these well

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[11] Cal Am Engineering Workpaper I15-600122, I15-600123 at 1-15. Cal Am plans well rehabilitation for the following wells in the 2027-2029 period: Goldside 7, College Greens Well, Coarsegold 3, Power Inn Well, Coarsegold 2, Geyserville Well 3, Countryside 1 Well, and Tally Ho 2 Well.

[12] Attachment 1-3: I15-600123 Cost Estimate.

[13] Cal Am requests $7,594,000 in 2028.

[14] Cal Am Engineering Workpaper I15-600122, I15-600123 at 1-15. Cal Am plans well rehabilitation for the following wells in the 2027-2028 period: Goldside 7, College Greens Well, Coarsegold 3, and Power Inn Well.

[15] Attachment 1-3: I15-600123 Cost Estimate.

[16] The Commission should adopt a budget of $2,072,000 for the 2027-2028 period for I15-600123. Cal Am requests $727,000 in 2027 and $7,594,000 in 2028 in its RO model for I15-600125. In order to match the distribution of Cal Am's budget request, the Commission should adopt a budget of $727,000 in 2027 and $1,345,000 in 2028 ($2,072,000-$727,000=$1,345,000) for I15-600123.

[17] *Application of California-American Water Company (U210w) to Increase Revenues in Each of its*

rehabilitation projects were ongoing[18] and only one of these projects was completed in 2025.[19] Cal Am states that the well rehabilitation projects planned under I15-600114 would not be completed until 2027.[20] It does not make sense to have two separate budgets for Cal Am's Well Rehabilitation Program. Therefore, the Commission should remove the funding in 2027 for I15-600114.[21]

2. Storage Tank Improvement Program (I15-600128)

The Commission should reduce the proposed budget from $1,308,000 to $1,261,311 for 2027-2028 as one of the individual tank rehabilitation projects is not necessary, the scope for one of the individual tank rehabilitation projects is unknown, and the "contingency item" costs should be removed from the tank rehabilitation costs.[22] Cal Am requests $114,000 in 2027 and $1,194,000 in 2028 for I15-600128.[23]

Cal Am requests $982,225 to rehabilitate six tanks over the 2027-2032 period, including the 437 Reservoir.[24] However, Cal Am plans to replace the existing 437 Reservoir with two 250,000-gallon tanks.[25] Cal Am is currently in negotiation to purchase additional property and plans to

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Districts Statewide, Direct Testimony of Lacy Carothers at 113.

[18] Cal Advocates Data Request A2507003 Public Advocates DR JMI-09 (Well Rehab Northern).

[19] Cal Advocates Data Request A2507003 Public Advocates DR JMI-17 (Well Sacramento).

[20] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[21] Cal Am requests $741,368 in 2027 for I15-600114.

[22] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5;" Attachment 1-5: I15-600128 Cost Estimate.

[23] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[24] Cal Am Engineering Workpaper I15-600128 at 1-1.

[25] Attachment 1-4: A2507003 Cal Advocates DR JMI-08 (Northern Tank Painting Costs).

have the tanks in service in 2028.[26] Since Cal Am is replacing the 437 Reservoir, it does not make sense for ratepayers to fund budgets for existing tank rehabilitation.

Cal Am also requests funding for tank rehabilitation improvements at Vista Heights. Cal Am estimates $156,975 budget for a Vista Heights tank rehabilitation.[27] However, Cal Am is currently not aware of the necessary improvements for the tanks at Vista Heights.[28] Cal Am inspected the tanks at Vista Heights in 2021.[29] Cal Am plans to re-inspect the tanks in 2026-2027 and evaluate for any further rehabilitation improvements for 2027-2032.[30] The Commission should not preapprove funding for the tank rehabilitation improvements at Vista Heights without fully knowing the necessary tank rehabilitation improvements.

Cal Am conducted tank inspections for the tanks it plans to rehabilitate during the 2027-2032 period. The tank inspection reports, conducted by Tank Industry Consultants (TIC), lists a set of recommended improvements for each tank.[31] One of the items among the list is an item

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[26] Attachment 1-4: A2507003 Cal Advocates DR JMI-08 (Northern Tank Painting Costs).

[27] Cal Am Engineering Workpaper I15-600128 at 1-1.

[28] Attachment 1-5: A2507003 Cal Advocates DR JMI-11 (Tank Rehabilitation Northern).

[29] A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 05-Vista Heights Tank 1 Evaluation Report Redacted at 2; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 06-Vista Heights Tank 2 Evaluation Report Redacted at 2. Excerpts of the TIC inspection reports are included in Attachment 1-6: TIC Inspection Report Excerpts.

[30] Attachment 1-5: A2507003 Cal Advocates DR JMI-11 (Tank Rehabilitation Northern).

[31] Cal Am Engineering Workpaper I15-600128 at 1-1; Cal Am's Response to Public Advocates Office's Data Request DKG-13, Q001 Attachment 57 – Countryside Backwash Redacted at 17; Cal Am's Response to Public Advocates Office's Data Request JMI-02, Attachment 10 437 Reservoir Redacted at 16; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 10-Site 9 Tank 1 Evaluation Report Redacted at 15. A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 11-Site 9 Tank 2 Evaluation Report Redacted at 15; Cal Am's Response to Public Advocates Office's Data Request JMI-02, Attachment 11 Rose Parade Redacted at 19; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 05-Vista Heights Tank 1 Evaluation Report Redacted at 16. For Vista Heights Tank 1, the TIC inspection report shows a recommended cost of $136,500 excluding tank painting costs; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 06-Vista Heights Tank 2 Evaluation Report

referred to as "contingency items."[32] The figure below shows the dollar amount of contingency items for each tank.

Table 2-2: Contingency Item in Tank Rehabilitation Improvements – Sacramento District[33]

Tank	Contingency Items
Rose Parade	$ 40,000
437 Reservoir	$ 25,000
Site 9 T1	$ 20,000
Site 9 T2	$ 20,000
Countryside	$ 30,000
Vista Heights	$30,000 (Vista Heights Tank 1) $20,000 (Vista Heights Tank 2)

Redacted" at 16. For Vista Heights Tank 2, the TIC inspection report shows a recommended cost of $136,500 excluding tank painting costs. Excerpts of the TIC inspection reports are included in Attachment 1-6: TIC Inspection Report Excerpts.

[32] Cal Am Engineering Workpaper I15-600128 at 1-1; Cal Am's Response to Public Advocates Office's Data Request DKG-13, Q001 Attachment 57 – Countryside Backwash Redacted at 17; Cal Am's Response to Public Advocates Office's Data Request JMI-02, Attachment 10 437 Reservoir Redacted at 16; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 10-Site 9 Tank 1 Evaluation Report Redacted at 15; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 11-Site 9 Tank 2 Evaluation Report Redacted at 15; Cal Am's Response to Public Advocates Office's Data Request JMI-02, Attachment 11 Rose Parade Redacted at 19; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 05-Vista Heights Tank 1 Evaluation Report Redacted: at 16. For Vista Heights Tank 1, the TIC inspection report shows a recommended cost of $136,500 excluding tank painting costs; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 06-Vista Heights Tank 2 Evaluation Report Redacted at 16. For Vista Heights Tank 2, the TIC inspection report shows a recommended cost of $136,500 excluding tank painting costs; Cal Advocates Data Request A2507003 Cal Advocates DR JMI-011 (Tank Rehabilitation Northern). Excerpts of the TIC inspection reports are included in Attachment 1-6: TIC Inspection Report Excerpts.

[33] Cal Am Engineering Workpaper I15-600128 at 1-1; Cal Am's Response to Public Advocates Office's Data Request DKG-13, Q001 Attachment 57 – Countryside Backwash Redacted at 17; Cal Am's Response to Public Advocates Office's Data Request JMI-02 Attachment 10 437 Reservoir Redacted at 16; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 10-Site 9 Tank 1 Evaluation Report Redacted at 15; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 11-Site 9 Tank 2 Evaluation Report Redacted at 15; Cal Am's Response to Public Advocates Office's Data Request JMI-02, Attachment 11 Rose Parade Redacted at 19; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 05-Vista Heights Tank 1 Evaluation Report Redacted at 16. For Vista Heights Tank 1, the TIC inspection report shows a recommended cost of $136,500 excluding tank painting costs; A.22-07-

As the Commission has repeatedly noted, "in a normal general rate case, a utility must demonstrate the reasonableness of every dollar in its revenue requirement."[34] The term contingency is a provision to account for an unforeseen event or circumstance.[35] It is inappropriate to increase customer rates to account for unknown errors or events that may or may not occur, or for unforeseen project changes that the Commission cannot currently review for reasonableness.

In D.19-05-020, Commission did not authorize contingency in software project budget.[36] The Commission stated that contingency cannot be established as reasonable since they are used to account for variables that are unknown and unpredictable.[37] D.21-08-036 expanded the exclusion of project contingency beyond software projects. The Commission denied contingency allowances for seismic retrofitting.[38] The Commission reiterated that,

> "…budgeting for contingencies is not necessarily appropriate in the context of a general rate case, where the utility must demonstrate the reasonableness of every dollar in its forecast revenue requirement."[39]

001, CAW Response Cal ADV JMI 04 Q001 Attachment 06-Vista Heights Tank 2 Evaluation Report Redacted at 16. For Vista Heights Tank 2, the TIC inspection report shows a recommended cost of $136,500 excluding tank painting costs; Cal Advocates Data Request A2507003 Cal Advocates DR JMI-011 (Tank Rehabilitation Northern). Excerpts of the TIC inspection reports are included in Attachment 1-6: TIC Inspection Report Excerpts.

[34] Decision (D.)96-12-066 at 5; D.21-08-036 at 331.

[35] Association for the Advancement of Cost Engineering (AACE) International Recommended Practice No. 10S-90 Cost Engineering Terminology, available at: https://library.aacei.org/terminology/welcome.shtml [accessed October 15, 2025]

[36] D.19-05-020 at 150.

[37] D.19-05-020 at 150.

[38] D.21-08-036 at 331.

[39] D.21-08-036 at 331.

In California Water Service Company (CWS)'s 2021 General Rate Case (A.21-07-002), the Commission determined that blanket contingencies for routine projects are unreasonable and create a disincentive to prudent forecasting by utilities.[40] Therefore, the contingency item costs were removed from the tank rehabilitation budget.

Similarly, the Commission should adopt a budget of $1,261,311 for 2027-2028 for I15-600128 because one of the individual tank rehabilitation projects is not necessary, the scope for one of the individual tank rehabilitation projects is unknown, and the "contingency item" costs should be removed from the tank rehabilitation costs.[41]

3. Northern Energy Storage GRIP (I15-600120)

The Commission should exclude funding for the Northern Energy Storage GRIP project due to the availability of grant funding. Cal Am requests $921,000 in 2025 and $921,000 in 2026 to install a battery energy storage system (BESS) in Sacramento.[42]

Cal Am states that this project is partly funded through a United States Department of Energy (DOE) grant.[43] In addition, the GRIP Program will reimburse Cal Am up to half of the full investment if all program requirements are achieved.[44] Cal Am is collaborating with the

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[40] D.24-03-042 at 26-27.

[41] Attachment 1-7: I15-600128 Cost Estimate. The Commission should adopt a budget of $109,931 in 2027 and $1,151,381 in 2028 for I15-600128. Cal Am's Engineering Workpaper (Engineering Workpaper 113) shows a cost estimate of $12,501,166 for the 2027-2032 period. The revised cost estimate is $12,054,941 after removing the contingency item costs and the cost of two tank rehabilitation projects. This results in a 3.57% reduction ((($12,501,166 - $12,054,941) ÷ $12,501,166) ×100% ≈ 3.57%). Therefore, the amount shown in the RO model was reduced by 3.57% or $1,261,311.

[42] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[43] Direct Testimony of Lacy Carothers at 145.

[44] Cal Am Engineering Workpaper I15-600120; *See also*, Cal Am's Response to Public Advocates Office's Data Request DKG-01, Question 3.b Attachment 3 where Cal Am provided a revised version of

company Generac to evaluate which sites to install a battery storage system.[45] Cal Am states that **<<BEGIN CONFIDENTIAL>>** [redacted] **<<END CONFIDENTIAL>>**.[46] However, GRIP grant contracts have not been finalized and are on hold due to an Executive Order requiring the DOE to complete a full review of all GRIP projects.[47] The DOE has delayed on-going negotiations.[48]

Cal Am had cancelled similar projects when they were unable to obtain grant funding. For example, Cal Am cancelled its Public Safety Power Shutoff (PSPS) Power Storage Project (I15-610024) in its Larkfield District.[49] Cal Am stated that the Larkfield PSPS Power Storage project was contingent upon grant funding by the CPUC's Self Generation Incentive Program ("SGIP").[50]

If Cal Am is able to obtain grant funding and decides to pursue this project, Cal Am may request to recover the cost for the project in a future rate case once it is completed and where the project costs can be reviewed for prudency.

4. Dunnigan WW Improvements (I15-620003)

The Commission should reduce Cal Am's proposed project budget from $2,980,000 to $2,680,000 since an electrical service was already

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Cal Am Engineering Workpaper I15-600120 in response to data request DKG-001.

[45] Direct Testimony of Lacy Carothers at 145.

[46] Cal Am's Response to Public Advocates Office's Data Request DKG-01, Question 3.b Attachment 1 CONFIDENTIAL.

[47] Attachment 1-8: A2507003 Cal Advocates DR JMI-10 (GRIP Projects).

[48] Attachment 1-8: A2507003 Cal Advocates DR JMI-10 (GRIP Projects).

[49] Direct Testimony of Lacy Carothers at 46.

[50] Direct Testimony of Lacy Carothers at 46.

installed as part of a previously approved project at the treatment facility. Cal Am requests funding to increase the capacity of the treatment plant by converting two of the existing infiltration basins and constructing three new infiltration basins.[51]

An electrical service was already installed as part of a previously approved project at the Dunnigan Wastewater Treatment Facility. In the Dunnigan Wastewater Improvements (I15-620002) project, Cal Am states that an electrical service will be provided by Pacific Gas and Electric Company (PG&E) as part of the project scope for I15-620002.[52] Cal Am confirmed that an electrical service was installed to support the project.[53] It does not make sense to include funding for an electrical service if an electrical service was already installed at the treatment facility. Therefore, the cost of a new electrical service was removed from the project cost. Cal Am estimates $300,000 for a new electrical service.[54] Therefore, the Commission should only adopt a budget of $2,680,000 for I15-620003.[55]

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[51] Direct Testimony of Lacy Carothers at 145.

[52] A.22-07-001, Cal Am Engineering Workpapers I15-620002 at PDF 4.

[53] Attachment 1-9: A2507003 Cal Advocates DR JMI-16 (Dunnigan Wastewater Improvements).

[54] Cal Am Engineering Workpaper I15-620003 at PDF 3.

[55] Cal Am's RO model shows a direct project budget of $545,858.28 in 2025, $545,858.28 in 2026, and $562,399.44 in 2027 (or a total direct project budget of $1,654,116) for I15-620003. In Cal Am's RO model, approximately 33% of the proposed budget occurs in 2025 ($545,858.28÷$1,654,116=33%), 33% of the proposed budget occurs in 2026 ($545,858.28÷$1,654,116=33%), and 34% of the proposed budget occurs in 2027 ($562,399.44÷$1,654,116=34%). Cal Am states in response to data request JMI-015 that the direct project budget included in the RO model in the application is incorrect and the total direct project budget should be $2,980,000. The revised recommended direct project budget of $2,680,000 for I15-620003 was distributed proportionally to the original percentage of the proposed direct project budget of I15-620003 for a particular year divided by the total direct project budget included in the application for I15-620003. Therefore, 33% of $2,680,000 was included in the RO model in 2025 for I15-620003 (or $884,400), 33% of $2,680,000 was included in the RO model in 2026 for I15-620003 (or $884,400), and 34% of $2,680,000 was included in the RO model in 2027 for I15-620003 (or $911,200).

5. CA-California Corporate Office (I15-010003-02)

The Commission should exclude funding for the office as discussed further in Cal Advocates' Report on Construction Work In Progress, Southern Division and Corporate Capital Projects regarding the proposed California Corporate Office.[56] Cal Am requests $24,000,000 for the 2026-2028 period for the proposed operations center that combines the Sacramento Operations, Capital Mall Office, and San Diego corporate headquarters in one location.[57] Cal Am separates the costs into two separate line items in its RO model: the Corporate portion (I15-010003-01) and the Sacramento portion (I15-010003-02).[58] Cal Am requests $12,720,000 in the 2026-2028 period for I15-010003-02.[59]

6. NOR-Standby Generator Improvement Program (I15-600125)

The Commission should reduce the proposed budget from $2,852,000 to $937,000 for 2027-2028[60] since one of the proposed project candidates is not needed. Cal Am requests funding to install nine generators in the Sacramento District during the 2027-2032 period.[61]

Cal Am's proposed project budget for this rate case cycle for I15-600125 exceeds the proposed budget to install all of the individual generator projects planned for the 2027-2032 period. Cal Am's proposed

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[56] Testimony of Sari Ibrahim, Report on Construction Work In Progress, Southern Division and Corporate Capital Projects, Chapter 5.

[57] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[58] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[59] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[60] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[61] Cal Am Engineering Workpaper I15-600125 at 1-20.

budget for I15-600125 for the 2027-2029 period is $6,003,000.[62] However, according to Cal Am's Engineering Workpaper, the cost to install all the generators planned during the 2027-2032 period is $3,045,000.[63]

The "Forest Ridge Water Treatment Plant (FRWTP) and Ditton" site is one of Cal Am's project candidates for I15-600125.[64] Cal Am proposes treatment at the FRWTP during this rate case as a separate project.[65] In Cal Am's cost estimate for the proposed treatment at FRWTP includes installing a generator at the FRWTP.[66],[67] The cost of a generator at the FRWTP site has been accounted for. Therefore, the cost for one of the generators was removed from I15-600125. This results in a cost of $2,811,000 for the generators planned during the 2027-2032 period, or approximately $468,500 per year.[68] In conclusion, the Commission should adopt a budget of $937,000 for the 2027-2028 period.[69]

7. Northern Well Treatment/NOR PFAS Treatment (I15-600118)

The Commission should reduce the project budget for treatment facilities from $7,798,107 to $3,347,107 because the arsenic levels at Quail

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[62] Direct Testimony of Lacy Carothers at 177.

[63] Cal Am Engineering Workpaper I15-600125 at 1-21.

[64] Cal Am Engineering Workpaper I15-600125 at 1-20.

[65] Cal Am Engineering Workpaper I15-600118, I15-600119 at 1-5.

[66] Cal Advocates Data Request A2507003 Public Advocates DR JMI-03 (Sacramento Water Quality); 1. Cal Am's Response to Public Advocates Office's Data Request JMI-03, Attachment CAW Response Cal Adv JMI-03 Q001.c Attachment 1, tab: "FRWTP TDS Cost."

[67] Attachment 1-10: FRWTP Treatment Cost Estimate.

[68] Attachment 1-11: I15-600125 Cost Estimate.

[69] The Commission should adopt a budget of $937,000 for the 2027-2028 period for I15-600125. Cal Am requests $250,000 in 2027 and $2,602,000 in its RO model for I15-600125. In order to match the distribution of Cal Am's budget request, the Commission should adopt a budget of $250,000 in 2027 and $687,000 in 2028 ($937,000-$250,000=$687,000) for I15-600125.

Meadows Well 2 are below the MCL.[70] Cal Am requests funding to install treatment facilities at the following sites for I15-600118: Quail Meadows Well 2, Meadowbrook Well 6, Countryside Way Well, and Forest Ridge Water Treatment Plant.[71] Cal Am states that the proposed treatment facility for Quail Meadows Well 2 is intended to treat arsenic or perfluorooctanoic acid (PFOA).[72]

Cal Am states that its internal deadline to install treatment facilities at Quail Meadows Well 2 is driven due to arsenic.[73] The United States Environmental Protection Agency (EPA) set an MCL of 10 micrograms per liter (µg/L) for arsenic.[74] The EPA establishes that violations to the MCL occur when the running average concentration exceeds the MCL.[75] Cal Am provided water quality data for Quail Meadows Well 2.[76] California State Water Resources Control Board's Safe Drinking Water Information System (SDWIS) website had additional arsenic water quality data for Quail

[70] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[71] Cal Am Engineering Workpaper I15-600119; Cal Advocates Data Request A2507003 Public Advocates DR JMI-03 (Sacramento Water Quality).

[72] Cal Advocates Data Request A2507003 Public Advocates DR JMI-03 (Sacramento Water Quality).

[73] Cal Advocates Data Request A2507003 Public Advocates DR JMI-12 (Sacramento Water Quality Cost).

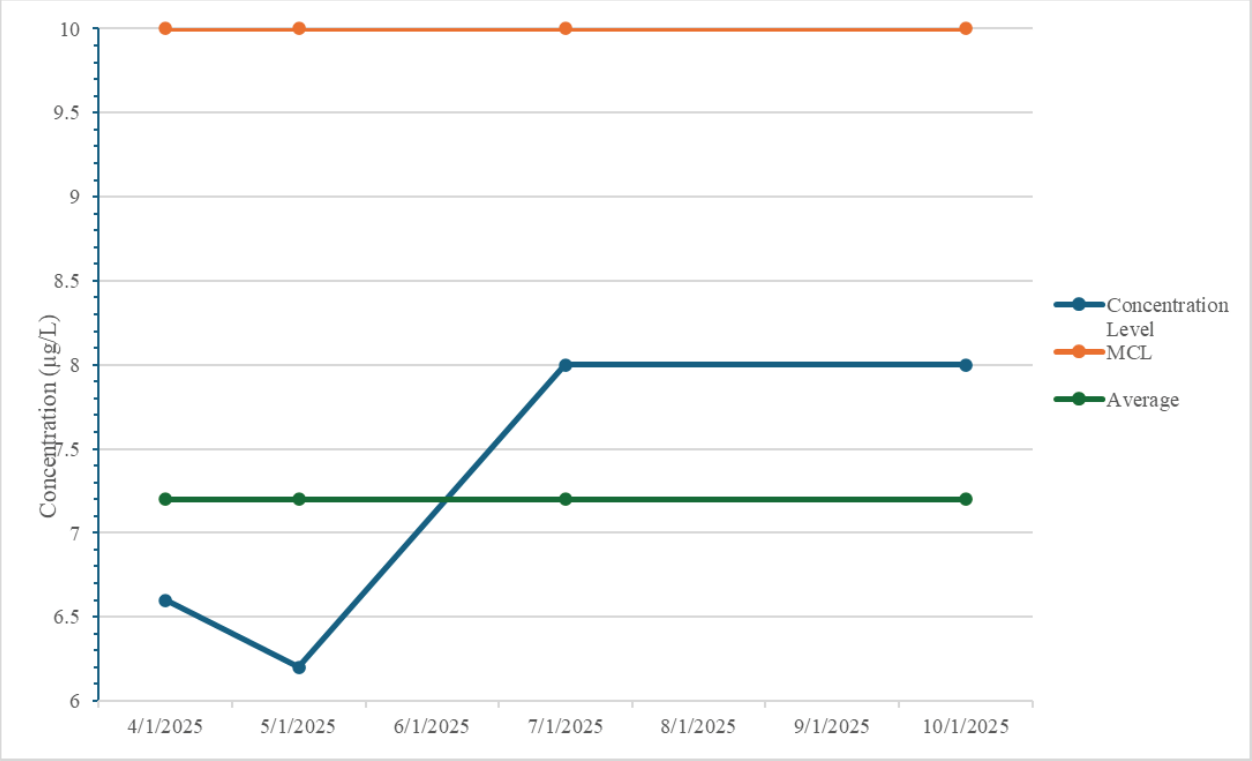
[74] California State Water Resources Control Board Arsenic in Drinking Water, available at: https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Arsenic.html

[75] California Drinking Water Program 2022 Annual Compliance Report at 48, available at: https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/docs/2022/acr-2022-final.pdf

[76] Cal Advocates Data Request A2507003 Public Advocates DR JMI-03 (Sacramento Water Quality).

Meadows Well 2.[77] Table 1-3 below displays the arsenic water quality data for Quail Meadows Well 2.[78]

Table 1-3: Quail Meadows Well 2 Water Quality Data - Arsenic[79],[80]



[77] California State Water Resources Control Board SDWIS, available at: https://sdwis.waterboards.ca.gov/PDWW/JSP/WSamplingResultsByStoret.jsp?SystemNumber=2010007&tinwsys_is_number=2701&FacilityID=039&WSFNumber=57736&SamplingPointID=039&SystemName=CAL+AM++OAKHURST&SamplingPointName=QUAIL+MEADOWS+WELL+2&Analyte=&ChemicalName=&begin_date=&end_date=&mDWW=) [accessed December 23, 2025]

[78] Cal Advocates Data Request A2507003 Public Advocates DR JMI-03 (Sacramento Water Quality).

[79] Cal Advocates Data Request A2507003 Public Advocates DR JMI-03 (Sacramento Water Quality). The data request asked Cal Am to provide water quality data from 2024 to July 15, 2025 (the date of the data request). Cal Am did not have any water quality data in 2024 for Quail Meadows Well 2) in its data request response. Cal Am states that this well was offline during 2024 and pumped to waste for sampling Division of Drinking Water (DDW) required constituents in 2024. Additionally, Cal Am only provided two water quality measurements for Quail Meadows Well 2 between January 1, 2025 and July 15, 2025 in its data request response.

[80] California State Water Resources Control Board SDWIS, available at: https://sdwis.waterboards.ca.gov/PDWW/JSP/WSamplingResultsByStoret.jsp?SystemNumber=2010007&tinwsys_is_number=2701&FacilityID=039&WSFNumber=57736&SamplingPointID=039&SystemName=CAL+AM++OAKHURST&SamplingPointName=QUAIL+MEADOWS+WELL+2&Analyte=&ChemicalName=&begin_date=&end_date=&mDWW=) [accessed December 23, 2025]. SDWIS arsenic

Table 1-3 shows that the arsenic levels at Quail Meadows Well 2 are below the MCL. In addition, Cal Am does not provide any water quality data for PFOA for Quail Meadows Well 2.[81] Therefore, the treatment facility at Quail Meadows 2 is not needed and the treatment facility costs should be removed. Cal Am estimates the treatment facility costs at Quail Meadows Well 2 is $4,451,000.[82] The Commission should only allow a budget of $3,347,107 for I15-600118.[83],[84]

8. NOR -Well Installation and Replacement Program (I15-600122)

The Commission should reduce the proposed budget from $8,321,000 to $6,136,596 for 2027-2028[85] based on Cal Am's historic expenditure under this program.

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water quality data for Quail Meadows Well 2 is included in Attachment 1-12: SDWIS Arsenic Water Quality Data – Quail Meadows Well 2.

[81] Cal Advocates Data Request A2507003 Public Advocates DR JMI-03 (Sacramento Water Quality).

[82] Cal Am Engineering Workpaper I15-600118, I15-600119 at 1-6. Cal Am estimates a construction cost of $3,622,000 for the proposed treatment facilities at Quail Meadows Well 2. In addition, Cal Am adds an additional $829,000 for design and design services during construction, permitting, environmental compliance and management, and construction management. This results in a total direct project cost budget of $4,451,000 for the proposed treatment facility at Quail Meadows Well 2.

[83] $7,798,107 - $4,451,000 = $3,347,107.

[84] Cal Am's RO model shows a direct project budget of $2,573,375.31 in 2025, $2,573,375.31 in 2026, and $2,651,356.38 in 2027 (or a total direct project budget of $7,798,107) for I15-600118. Cal Am plans to install the proposed treatment facilities at Quail Meadows Well 2 prior to 2027. Cal Am would likely spend funding the proposed treatment facility at Quail Meadows Well 2 in 2025 and 2026. In Cal Am's RO model, Cal Am requests the same budget for I15-600118 in 2025 and 2026. Since Cal Am requests the same budget for I15-600118 in 2025 and 2026, half of the proposed treatment cost of $4,451,000 (or $2,225,500) was removed from the proposed direct project budget in 2025 and half of the proposed treatment cost of $4,451,000 (or $2,225,500) was removed from the proposed direct project budget in 2026. Therefore, the Commission should only include $347,875.31 in the RO model in 2025 ($2,573,375.31 -$2,225,500=$347,875.31), $347,875.31 in the RO model in 2026 ($2,573,375.31-$2,225,500 = $347,875.31), and $2,651,356.38 in the RO model in 2027.

[85] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

Cal Am is unable to complete the well projects as scheduled. In the 2022 rate case, there were two well installation and replacement programs in the Sacramento District for the 2024-2026 period: the NOR-Well Installation and Replacement Program (I15-600113) and Fruitridge (FRV)-Well Replacement and Installation Program (I15-660006). Cal Am requests funding for I15-600113 and I15-660006 again in this GRC which is beyond the last rate case cycle (2024-2026). Cal Am requests approximately $1,030,129 in 2027 for I15-600113 and approximately $2,571,248 in 2027 and $3,506,247 in 2028 for I15-660006.[86] These budget requests were not specific to individual projects but were "programmatic budget" for the last GRC. Yet, Cal Am requests funding again for its Well Installation and Replacement Program in 2027-2029 which covers the entire Sacramento District. Cal Am essentially has multiple budgets for well replacement programs in 2027. It does not make sense to have multiple redundant budgets for Cal Am's Well Replacement Program which is not specific to a project. Therefore, the Commission should remove the funding in 2027 for I15-600113 and remove funding in 2027 and 2028 for I15-660006.

During the 2021-2023 period, Cal Am spent approximately $7,948,000 for the Well Installation and Replacement Program (under I15-600098).[87] Since Cal Am has only been able to complete an average of $2,649,333 per year under this program,[88] the Commission should only allow a budget of $2,649,333 per year escalated to 2027 and 2028 dollars.

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[86] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[87] Direct Testimony of Lacy Carothers at 26.

[88] $7,948,000 ÷ 3 years ≈ $2,649,333.

Therefore, the Commission should adopt a budget of $6,136,596 for 2027-2028 for I15-600122.[89]

9. NOR-Main Replacement Program (I15-600121)

The Commission should reduce the proposed budget from $23,622,000 to $10,273,505 for 2027-2028[90] based on the amount of pipeline Cal Am has historically installed under this program.[91]

Cal Am plans a 1% replacement rate which is approximately 43,239 feet per year.[92] Cal Am replaced and plans to replace approximately 126,935 linear feet between April 2020 through the end of 2026[93] or an average of approximately 18,805 linear feet per year.[94] Cal Am's historical performance shows that Cal Am cannot complete the requested replacement amount under this program. Historically, Cal Am has only been able to complete approximately 43.5% of what Cal Am requests in this rate case.[95]

In addition, Cal Am is not able to complete the main replacement as scheduled. In the 2022 rate case, the NOR-Main Replacement Program was for the 2024-2026 period under project code I15-600111. However, Cal Am requests funding again during this rate case cycle for the same

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[89] The recommended budget of $2,649,333 per year results in $3,027,428 in 2027 dollars and $3,109,168 in 2028 dollars for I15-600122 (or approximately $6,136,596 in 2027-2028). Cal Am requests $727,000 in 2027 and $7,594,000 in 2028 in its RO model. In order to match the distribution of Cal Am's budget request, the Commission should adopt a budget of $727,000 in 2027 and $5,409,596 in 2028 ($6,136,596-$727,000 =$5,409,596) for I15-600122. The Bureau of Labor Statistics provided a consumer price index (CPI) inflation calculator and November 2025 CPI on its website, which was used to escalate the project costs.

[90] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[91] The Commission should adopt a budget of $3,969,012 in 2027 and $6,304,493 in 2028 for I15-600121.

[92] Cal Am Engineering Workpaper I15-600121 at 1-24.

[93] Attachment 1-13: Completed Pipeline Projects – Sacramento.

[94] Cal Advocates Data Request A2507003 Public Advocates DR SIH-09 (Pipeline and Replacements III).

[95] 18,809 linear feet per year ÷ 43,239 linear feet per year ≈ 43.5%.

project (I15-600111) which was already funded in the last GRC. Cal Am requests approximately $4,751,918 in 2027 for I15-600111.[96] Cal Am is already requesting funding for its Main Replacement Program in 2027 under a separate project code: I15-600121. Cal Am essentially has two redundant budgets for main replacement program in 2027. Therefore, the Commission should remove the funding in 2027 for I15-600111.

Since Cal Am has historically only been able to complete approximately 43.5% of the amount of pipeline Cal Am requests to replace per year in this rate case, Cal Am should only allow 43.5% of its proposed budget.[97] Therefore, the Commission should adopt a budget of $3,969,012 in 2027 and $6,304,493 in 2028 for I15-600121.

B. Proposed Projects Previously Funded but Not in Service Projects

Cal Am's requested capital budget includes the projects the Commission previously authorized and placed into rates, but Cal Am did not complete these projects on time and yet requests budgets in this GRC. The Commission should reduce Cal Am's proposed budget for uncompleted projects that were funded and included in rates in prior GRCs by $2,696,301 in 2025, $4,841,992, in 2026, $17,003,585 in 2027, and $9,318,844 in 2028. Cal Am can proceed with these projects and seek recovery of all reasonable and prudent costs in a future GRC when the projects are completed, placed in service and provide a benefit to ratepayers. Attachment 1-14 of this Report lists these previously funded projects

[96] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[97] Cal Am's historical replacement rate of approximately 18,809 feet of pipeline per year results in a historical replacement rate of approximately 0.435% per year ((18,809 feet÷43,239 feet) ×1%× 100%≈ 0.435%).

in Sacramento.[98] Attachment 1-14 shows previously approved projects that Cal Am now expects to be completed in 2027 (or later).[99]

According to Cal Am, the completion date for the projects shown in Attachment 1-14 has been delayed beyond the original completion year.[100] For some projects, the project has spanned across multiple rate cases. Due to continuing uncertainty in project completion, it remains speculative whether the projects will be completed by the revised completion date. According to Cal Am, some of the projects shown in Attachment 1-14 will not be complete until Cal Am submits its application for the next rate cycle.[101]

In addition, it is also uncertain whether Cal Am will even complete these projects. Cal Am also states some of the projects that were previously approved by the Commission, and the project costs were included in rates under the assumption that they would be completed, were ultimately cancelled. Attachment 1-15 shows a list of previously approved projects that Cal Am has cancelled.[102]

In a competitive market, a company does not earn a profit on capital investment until the project is used and useful and placed into service. If the Commission permits Cal Am to include incomplete projects in customer rates, the utility will have less incentive to complete the projects because Cal Am already starts collecting a rate of and return on assets that are not yet used and useful. Cal Am would effectively profit from projects that linger in any phase of construction or even design. The Commission's role as a substitute for competition is to ensure that Cal Am does not collect profit until projects are completed, become used and

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[98] Attachment 1-14: Previously Funded but Not Complete Projects – Sacramento District.

[99] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[100] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[101] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[102] Attachment 1-15: Previously Funded but Cancelled Projects.

useful, and prove to be beneficial to ratepayers.[103] For the projects shown in Attachment 1-15, the Commission approved these projects, and the project costs were embedded in rates under the assumption that these projects would be completed and provide a benefit to ratepayers. However, these projects were never completed, but ratepayers were still ultimately on the hook for funding projects that they ultimately received no benefit from.

For the reasons mentioned above, the Commission should remove the project costs associated with the project in Attachment 1-14 from rates in this rate case until the projects are in service and provide a benefit to ratepayers. Cal Am can proceed with these projects and seek recovery of all reasonable and prudent costs in a future GRC when the projects are completed, placed in service and provide a benefit to ratepayers. This will provide the Commission with the opportunity to review the project's actual costs for reasonableness and prudence. Cal Am should not include funding for the projects listed in Attachment 1-14 in this rate case.

C. Recurring Project Budget

The Commission should reduce the recurring project budget for 2027-2028 from $14,642,000 to $13,630,124[104] due to reducing the vehicles recurring project category budget as discussed further in Cal Advocates' Report on Depreciation Expenses, Weighted Average Depreciation Reserve and Plant, Cost of Removal, Early Retirement and Vehicles.[105] Cal Am states that its recurring project budget is intended for routine capital expenditures that are necessary to support the

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[103] D.10-12-058, Conclusion of Law (CoL) 2 at 18; D.84-09-089, where the Commission stated, "Over the years, this Commission has closely adhered to the 'used and useful' principle, which requires that utility property be actually in use and providing service in order to be included in the utility's ratebase."

[104] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[105] Testimony of Susana Nasserie, Report on Depreciation Expenses, Weighted Average Depreciation Reserve and Plant, Cost of Removal, Early Retirement and Vehicles, Chapter 2.

operation of a reliable water system such as short sections of distribution mains, valves, hydrants, service lines, meters, small pumps and motors, and other items considered general equipment.[106]

D. 2029 Specific Capital Project Budgets

The Commission should not authorize any specific project budgets for 2029 in the current rate case. Capital project budgets in 2029 are not part of the purview of the current GRC and would be examined for reasonableness in the subsequent GRC filing. In the current GRC, the capital budget for 2029 is calculated formulaically as an attrition year increase and is not affected by 2029 specific project budgets.[107]

Cal Am has several specific budgets forecast in the year 2029. It would be inappropriate to authorize the 2029 specific budget requests in the current GRC for multiple reasons. First as per the Rate Case Plan and the Revised Rate Case Plan, the rate base forecast, including capital additions, will consist of two test years (2027 and 2028) and an attrition year (2029).[108] The capital budget for the attrition year 2029 should be calculated according to the Rate Case Plan. The budget for attrition year 2029 is calculated based on the difference of the first and second test years rate base and is unaffected by the proposed specific budgets.[109]

Second, since Cal Am's proposed 2029 budgets do not affect the revenue requirement the projects cannot be reviewed for reasonableness in the current GRC cycle. The revenue requirement for 2029 is forecast only on the difference

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[106] Direct Testimony of Lacy Carothers at 13.

[107] Cal Am RO model file "ALL_CH02_SE_RO_Sheet Forecast," tab: "SOU_RevReq," cell L164.

[108] The Revised Rate Case Plan (D.07-05-062) states at A-19 "All rate base items, including capital additions and depreciation, shall not be escalated but rather shall be subject to two test years and an attrition year, consistent with D.04-06-018."

[109] According to the Rate Case Plan (D.04-06-018), the attrition allowance methodology estimates the rate base additions for the third year of the rate case cycle (2029 in this rate case cycle) based on the difference between the first and second test year rate base.

in rate base additions from the two test years. The effects of the proposed 2029 project budgets would be calculated in the next GRC cycle as with the 2026 project budgets in the current GRC. As such the reasonableness of the 2029 budgets would be appropriate for review in the next GRC filing. The absence of testimony on 2029 budgets is not an endorsement of the proposed budgets, they simply should not be included in the current GRC.

The Commission should not approve any specific capital budgets for the attrition year 2029. The Commission should adopt a rate base for attrition year 2029 based on the methodology described in the Rate Case Plan.

IV. CONCLUSION

The Commission should adopt a budget of $2,072,000 for the NOR-Well Rehabilitation Program (I15-600123) for 2027-2028 to align with the proposed improvements for the same time period. The Commission should adopt a budget of $1,261,311 for the Storage Tank Improvement Program (I15-600128) for 2027-2028 which excludes unknown and unnecessary projects and "contingency item" costs.

The Commission should exclude funding for the Northern Energy Storage GRIP project (I15-600120) due to the availability of grant funding. The Commission should also reduce Cal Am's proposed project budget for the Dunnigan WW Improvements (I15-620003) project to $2,680,000 since an electrical service was already installed as part of a previously approved project at the treatment facility. The Commission should also exclude funding for the CA-California Corporate Office project (I15-010003-02) as discussed further in Cal Advocates' Report on Construction Work In Progress, Southern Division and Corporate Capital Projects, regarding the proposed California Corporate Office.[110]

[110] Testimony of Sari Ibrahim, Report on Construction Work In Progress, Southern Division and Corporate Capital Projects, Chapter 5.

The Commission should adopt a budget of $937,000 for the NOR-Standby Generator Improvement Program (I15-600125) for 2027-2028 because one of the proposed project candidates is not needed. Furthermore, the Commission should adopt a budget of $3,347,107 for the Northern Well Treatment/NOR PFAS Treatment project (I15-600118) because the arsenic levels at Quail Meadows Well 2 is below the MCL.

The Commission should adopt a budget of $6,136,596 for the NOR -Well Installation and Replacement Program (I15-600122) for 2027-2028 based on Cal Am's historic expenditure under this program. Finally, the Commission should adopt a budget of $10,273,505 for the NOR-Main Replacement Program (I15-600121) for 2027-2028 based on the amount of pipeline Cal Am has historically installed under this program.[111]

[111] The Commission should adopt a budget of $3,969,012 in 2027 and $6,304,493 in 2028 for I15-600121.

CHAPTER 2 PLANT – LARKFIELD

I. INTRODUCTION

This chapter addresses Cal Am's over forecast capital budgets, capital budgets for unnecessary projects, repeated funding requests for certain projects, and historical performance in the Larkfield District. Cal Am's Larkfield District is supplied through a combination of groundwater from four wells and purchased water from the Sonoma County Water Agency.[112] Cal Advocates reviewed Cal Am's testimony, application, workpapers, minimum data requirements, CPS, capital budget estimates, and responses to Cal Advocates' data requests. Cal Advocates conducted a field investigation of the Larkfield District's water system on September 3, 2025.

II. SUMMARY OF RECOMMENDATIONS

The Commission should reduce or remove Cal Am's request for individual proposed project budgets for rate making purposes, as follows:

The Commission should not approve funding for the Larkfield (LRK)-Well 4 Rehabilitation (I15-610033) project because the Commission has already approved funding for Well 4 rehabilitation within an approved capital budget. Ratepayers funded the Well 4 rehabilitation project cost in the last GRC.

The Commission should reject Cal Am's request of $227,487 in 2027 and $227,487 in 2028 for the LRK-Wikiup Bridge Way Pressure Reducing Valve (PRV) project (I15-610035) since there have not been any recorded incidents of high pressure, customer complaints due to high pressure, or main breaks in the area.

[112] Direct Testimony of Garry Hofer at 6.

The Commission should reduce the proposed budget for the LRK-Main Replacement Program (I15-610032) from $1,869,000 to $1,733,927 for 2027-2028 based on the amount of pipeline Cal Am has historically installed under this program.[113]

Recommendations on plant budgets also reflect Cal Advocates' recommendations regarding previously funded projects expected to be completed in 2027 or later. The Commission should not allow Cal Am to include projects in rates that have been previously funded by ratepayers but are not completed. These projects should not be included in rates again until the projects are completed, in service, and provide benefits to ratepayers. Cal Am may seek recovery of the project costs when it files its next general rate case application (in 2028).

Attachment 2-1 presents Cal Advocates' project-specific adjustments. Table 2-1 below presents the summary of Cal Advocates' recommended budget and compares it with Cal Am's requested budget.[114]

Table 2-1: Capital Budget Summary – Larkfield District[115]

Larkfield ($000)	2027	2028	Annual Average
Public Advocates Office Recommendation	$ 1,616.07	$ 4,500.39	$ 3,058.23
Cal Am's Proposed	$ 2,928.18	$ 5,664.96	$ 4,296.57
Cal Am> Public Advocates Office	$ 1,312.10	$ 1,164.57	$ 1,238.33
Public Advocates Office as % of Cal Am	55%	79%	71%

[113] The Commission should adopt a budget of $648,483 in 2027 and $1,085,444 in 2028 for I15-610032.

[114] Attachment 2-1: Capital Budget Details – Larkfield District.

[115] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5;" Attachment 2-1: Capital Budget Details – Larkfield District.

III. ANALYSIS

Unless otherwise stated, the project budgets listed and discussed below are direct project costs. Direct project budgets are the project budgets without add-ons such as overhead.

A. Proposed Projects

1. LRK-Well 4 Rehabilitation (I15-610033)

The Commission should not approve any additional funding for this project because it has already approved funding for Well 4 rehabilitation within an approved capital project. Cal Am requests $276,300 in 2027 under I15-610033 for the routine maintenance, major equipment replacement, and well rehabilitation of Well 4.[116]

In the 2022 rate case, the Commission approved funding for the Well Rehabilitation and Maintenance Program for the 2024-2026 period (I15-610028).[117] Cal Am states that the well rehabilitation projects planned under I15-610028 include Well 1, Well 3, and Well 4 and would be completed by 2026.[118] The Commission approved funding for I15-610028 and the project budgets were embedded into rates under the assumption that Cal Am completed the project as scheduled. However, Cal Am requests funding in this rate case for the rehabilitation of Well 4 under I15-610033. Ratepayers have already funded the rehabilitation of Well 4 under I15-610028 and should not be responsible for funding a project that they have already funded. The Commission should have Cal Am complete the well rehabilitation of Well 4 under I15-610028. When Cal Am completes the

[116] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[117] D. 24-12-025, Attachment C-3 For Settlement Disputed Capital Expenditure Comparison at PDF 115.

[118] Direct Testimony of Lacy Carothers at 133.

well rehabilitation of Well 4 and the project cost exceeds the approved budget, Cal Am can request to recover the difference in a subsequent rate case.

2. LRK-Wikiup Bridge Way Pressure Reducing Valve (PRV) (I15-610035)

The Commission should reject Cal Am's request of $227,487 in 2027 and $227,487 in 2028 to install a PRV along Wikiup Bridge Way since there have not been any recorded incidents of high pressure, customer complaints due to high pressure, or main breaks in the area.[119]

Cal Am alleges high pressure in the model junctions during normal operating conditions.[120] Cal Am states that the high pressure was observed in the hydraulic model, which was calibrated in 2024.[121] Cal Am's claim of high-pressure condition is only based on a "modeling" exercise based on the actual condition. Cal Am states that it currently does not track or collect pressure data along the Wikiup Way Bridge water main.[122] If a tabletop exercise reveals an issue with pressure in the main, the most logical next step would be to verify the result with pressure measurements in the field before creating a project. Cal Am did not furnish any recorded incidents of high pressure.[123] In addition, Cal Am states that there have not been any customer complaints in the areas due to pressure or main breaks over the last three years (2022-2024).[124] Since there have been no recorded

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[119] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[120] Cal Am Engineering Workpaper I15-610035 at PDF 1.

[121] Attachment 2-2: A2507003 Cal Advocates DR JMI-06 (Larkfield PRV).

[122] Attachment 2-2: A2507003 Cal Advocates DR JMI-06 (Larkfield PRV).

[123] Attachment 2-2: A2507003 Cal Advocates DR JMI-06 (Larkfield PRV).

[124] Attachment 2-2: A2507003 Cal Advocates DR JMI-06 (Larkfield PRV).

incidents of high pressure nor recorded customer complaints, and main breaks due to high pressure in the area, the project is not necessary at this time. Therefore, the Commission should reject Cal Am's request for I15-610035.

3. LRK-Main Replacement Program (I15-610032)

The Commission should reduce the proposed budget from $1,869,000 to $1,733,927 for 2027-2028[125] based on the amount of pipeline Cal Am has historically installed under this program.[126]

Cal Am requests a 1% replacement rate per year.[127] Cal Am's Larkfield District has approximately 35.93 miles of pipeline.[128] Therefore, a 1% replacement rate would result in approximately 1,897 linear feet per year.[129] For the Main Replacement Program for the 2024-2026 period (I15-610025), Cal Am replaced and plans to replace a total of 5,280 linear feet[130] or approximately 1,760 linear feet per year.[131] Cal Am's historical performance shows that Cal Am cannot complete the requested replacement amount under this program. The amount of pipeline replaced under I15-610025 represents approximately 93% of the proposed 1% replacement rate.[132] Since Cal Am has historically only been able to complete approximately 93% of the amount of pipeline Cal Am is requesting to

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[125] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

[126] The Commission should adopt a budget of $648,483 in 2027 and $1,085,444 in 2028 for I15-610032.

[127] Cal Am Engineering Workpaper I15-610032 at 2-3.

[128] Cal Am Engineering Workpaper 2025 Larkfield CPS CONFIDENTIAL at 5-13.

[129] $35.93\ miles \times \frac{5280\ feet}{mile} \times 0.01 \approx 1897\ feet.$

[130] Attachment 2-3: Completed Pipeline Projects – Larkfield District

[131] Cal Advocates Data Request A2507003 Public Advocates DR SIH-09 (Pipeline and Replacements III).

[132] 1,760 linear feet ÷ 1,897 linear feet ≈ 93%.

replace per year in this rate case, Cal Am should only allow 93% of its proposed budget.[133] Therefore, the Commission should adopt a budget of $648,483 in 2027 and $1,085,444 in 2028 for I15-610032.

B. Previously Funded but Not in Service Projects

Cal Am's requested capital budget includes the projects the Commission previously authorized and placed into rates, but Cal Am did not complete these projects on time and yet asked budgets in this GRC. It is not reasonable to impose an additional cost burden on ratepayers when they do not receive a corresponding benefit. The Commission should reduce Cal Am's proposed budget for uncompleted projects that were funded and included in rates in prior GRCs by $94,725 in 2025, $189,450 in 2026, $757,799 in 2027, and $852,524 in 2028. Cal Am can proceed with these projects and seek recovery of all reasonable and prudent costs in a future GRC when the projects are completed, placed in service, and provide benefit to ratepayers. Attachment 2-4 of this Report lists these previously funded projects in Larkfield.[134] Chapter 1 of this Report provides further discussion of Previously Funded but not in Service Projects.

C. 2029 Specific Capital Project Budgets

The Commission should not authorize any specific project budgets for 2029 in the current rate case. Capital project budgets in 2029 are not part of the purview of the current GRC and would be examined for reasonableness in the subsequent GRC filing. In the current GRC, the capital budget for 2029 is calculated formulaically as an attrition year increase and is not affected by 2029

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[133] Cal Am's historical replacement rate of approximately 1,760 feet of pipeline per year results in a historical replacement rate of approximately 0.928% per year ((1,760 feet÷1,897 feet) ×1%× 100% ≈ 0.928%).

[134] Attachment 2-4: Previously Funded but Not Complete Projects – Larkfield District.

specific project budgets.[135] Chapter 1 of this Report provides further discussion of 2029 Specific Capital Project Budgets.

IV. CONCLUSION

The Commission should not approve funding for the LRK-Well 4 Rehabilitation (I15-610033) project because it has already approved funding for Well 4 rehabilitation within an approved capital project. Ratepayers funded the Well 4 rehabilitation project cost in the last GRC. The Commission should reject Cal Am's request of $227,487 in 2027 and $227,487 in 2028 for the LRK-Wikiup Bridge Way PRV project (I15-610035) since there have not been any recorded incidents of high pressure, customer complaints due to high pressure, nor main breaks in the area. The Commission should adopt a budget of $1,733,927 for the LRK-Main Replacement Program (I15-610032) for 2027-2028 based on the amount of pipeline Cal Am has historically installed under this program.[136]

[135] Cal Am RO model file "ALL_CH02_SE_RO_Sheet Forecast," tab: "SOU_RevReq," cell L164.

[136] The Commission should adopt a budget of $648,483 in 2027 and $1,085,444 in 2028 for I15-610032.

Attachment 1-1: Qualifications of Witness

QUALIFICATIONS AND PREPARED TESTIMONY
OF
JUSTIN MENDA

Q.1 Please state your name and address.

A.1 My name is Justin Menda and my business address is 505 Van Ness Ave, San Francisco, California 94102.

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

A.2 I am a Utilities Engineer in the Water Branch of the Cal Advocates of California Public Utilities Commission.

Q.3 Please describe your educational and professional experience.

A.3 I received a Bachelor of Science Degree and Master of Science Degree in Civil Engineering from the University of California Irvine.

I have been employed by Cal Advocates since June 2012. Since that time, I prepared testimony on capital investment in serval GRCs: California Water Service Company's 2012, 2015, 2018, 2021 and 2024 GRCs; California-American Water's 2013, 2016, 2019 and 2022 GRCs; San Jose Water Company's 2015 GRC; and Golden State Water Company's 2017, 2020 and 2023 GRC.

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

A.4 I am responsible for the preparation of testimony regarding proposed plant projects in the Northern Division.

Q.5 Does that complete your prepared testimony?

A.5 Yes, it does.

Attachment 1-2: Capital Budget Details - Sacramento

Att. Table 1-1: 2027 Capital Budget Details – Sacramento District[137, 138]

2027	Project #	Project Description	Public Advocates Office Recommendation	Cal Am Proposed	Cal Am > Public Advocates Office	Public Advocates Office/ Cal Am
1	I15-600121	NOR-Main Replacement Program 2027-2029	$ 3,969,012	$ 9,126,000	$ 5,156,988	43%
2	I15-600122	NOR-Well Installation and Replacement Program 2027-2029	$ 727,000	$ 727,000	$ -	100%
3	I15-600123	NOR-Well Rehabilitation Program 2027-2029	$ 727,000	$ 727,000	$ -	100%
4	I15-600125	NOR-Standby Generator Improvement Program 2027-2029	$ 250,000	$ 250,000	$ -	100%
5	I15-600127	NOR-Pump Station Improvement Program 2027-2029	$ 219,000	$ 219,000	$ -	100%
6	I15-600128	NOR-Storage Tank Improvement Program 2027-2029	$ 109,931	$ 114,000	$ 4,069	96%
7	I15-670013	HILL-Oakhurst Hydraulic Improvements	$ 360,000	$ 360,000	$ -	100%
8	I15600118	NOR-PFAS Treatment	$ 2,651,356	$ 2,651,356	$ -	100%
9	I15010003-02	CA-California Corporate Office	$ -	$ 2,131,000	$ 2,131,000	0%
10	I15-620003	DWW-Dunnigan Wastewater Improvement	$ 911,200	$ 1,013,200	$ 102,000	90%
Specifics Total			**$ 9,924,499**	**$ 17,318,556**	**$ 7,394,057**	**57%**
Recurring Project Total			**$ 6,695,000**	**$ 7,090,000**	**$ 395,000**	**94%**
Projects Previously Funded but not yet Complete			**$ -**	**$ 17,003,585**	**$ 17,003,585**	**0%**
TOTAL 2027			**$ 16,619,499**	**$ 41,412,141**	**$ 24,792,642**	**40%**

[137] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5." The project costs listed are direct project costs.

[138] Cal Am's RO model shows a direct project budget of $545,858.28 in 2025, $545,858.28 in 2026, and $562,399.44 in 2027 (or a total direct project budget of $1,654,116) for I15-620003. In Cal Am's RO model, approximately 33% of the proposed budget occurs in 2025 ($545,858.28÷$1,654,116≈33%), 33%

of the proposed budget occurs in 2026 ($545,858.28÷$1,654,116≈33%), and 34% of the proposed budget occurs in 2027 ($562,399.44÷$1,654,116≈34%). Cal Am states in response to data request JMI-015 that the direct project budget included in the RO model in the application is incorrect and the total direct project budget should be $2,980,000. The direct project budget for I15-630002 shown in the table is the direct project cost distributed proportionally to the original percentage of the proposed direct project budget of I15-620003 for a particular year divided by the total direct project budget included in the application for I15-620003. The proposed direct project budget for I15-620003 is $2,980,000. Therefore, 34% of $2,980,000 was included in the table for Cal Am's 2027 proposed direct project budget for I15-620003 (or $1,013,200). The revised recommended direct project budget for I15-620003 is $2,680,000. Therefore, 34% of $2,680,000 was included in the table for Cal Advocates' recommended 2027 direct project budget for I15-620003 (or $911,200).

Att. Table 1-2: 2028 Capital Budget Details – Sacramento District[139]

2028	Project #	Project Description	Public Advocates Office Recommendation	Cal Am Proposed	Cal Am > Public Advocates Office	Public Advocates Office/ Cal Am
1	I15-600121	NOR-Main Replacement Program 2027-2029	$ 6,304,493	$ 14,496,000	$ 8,191,507	43%
2	I15-600122	NOR-Well Installation and Replacement Program 2027-2029	$ 5,409,596	$ 7,594,000	$ 2,184,404	71%
3	I15-600123	NOR-Well Rehabilitation Program 2027-2029	$ 1,345,000	$ 7,594,000	$ 6,249,000	18%
4	I15-600125	NOR-Standby Generator Improvement Program 2027-2029	$ 687,000	$ 2,602,000	$ 1,915,000	26%
5	I15-600127	NOR-Pump Station Improvement Program 2027-2029	$ 2,278,000	$ 2,278,000	$ -	100%
6	I15-600128	NOR-Storage Tank Improvement Program 2027-2029	$ 1,151,381	$ 1,194,000	$ 42,619	96%
7	I15-670013	HILL-Oakhurst Hydraulic Improvements	$ 341,000	$ 341,000	$ -	100%
8	I15010003-02	CA-California Corporate Office	$ -	$ 9,540,000	$ 9,540,000	0%
Specifics Total			**$ 17,516,469**	**$ 45,639,000**	**$ 28,122,531**	**38%**
Recurring Project Total			**$ 6,935,124**	**$ 7,552,000**	**$ 616,876**	**92%**
Projects Previously Funded but not yet Complete			**$ -**	**$ 9,318,844**	**$ 9,318,844**	**0%**
TOTAL 2028			**$ 24,451,593**	**$ 62,509,844**	**$ 38,058,251**	**39%**

[139] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5." The project costs listed are direct project costs.

Attachment 1-3: I15-600123 Cost Estimate

Att. Table 1-3: 2027-2029 Cost Estimate – I15-600123[140]

Item	Unit Cost	Unit	Total
Well Assessment	$ 250,000	8	$ 2,000,000
Design and Design Services During Construction	$ 25,000	8	$ 200,000
Permitting	$ 5,000	8	$ 40,000
Environmental Compliance and Management	$ 13,000	8	$ 104,000
Construction Management	$ 25,000	8	$ 200,000
Subtotal			$ 2,544,000
Hydropneumatic Tanks	$ 157,000	6	$ 942,000
Design and Design Services During Construction	$ 16,000	6	$ 96,000
Permitting	$ 3,000	6	$ 18,000
Environmental Compliance and Management	$ 8,000	6	$ 48,000
Construction Management	$ 16,000	6	$ 96,000
Subtotal			$ 1,200,000
Total			$ 3,744,000

Att. Table 1-4: 2027-2028 Cost Estimate – I15-600123[141]

Item	Unit Cost	Unit	Total
Well Assessment	$ 250,000	4	$ 1,000,000
Design and Design Services During Construction	$ 25,000	4	$ 100,000
Permitting	$ 5,000	4	$ 20,000
Environmental Compliance and Management	$ 13,000	4	$ 52,000
Construction Management	$ 25,000	4	$ 100,000
Subtotal			$ 1,272,000
Hydropneumatic Tanks	$ 157,000	4	$ 628,000
Design and Design Services During Construction	$ 16,000	4	$ 64,000
Permitting	$ 3,000	4	$ 12,000
Environmental Compliance and Management	$ 8,000	4	$ 32,000
Construction Management	$ 16,000	4	$ 64,000
Subtotal			$ 800,000
Total			$ 2,072,000

[140] Cal Am Engineering Workpaper I15-600122, I15-600123 at 1-15.

[141] Cal Am Engineering Workpaper I15-600122, I15-600123 at 1-15.

Attachment 1-4: A2507003 Cal Advocates DR JMI-08 (Northern Tank Painting Costs)

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 JMI-08

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Attorneys for California-American Water Company

Dated: September 22, 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 JMI-08 ("Data Requests" or "RPD"), propounded on September 22, 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:	**Usmita Pokhrel**
Title:	**Project Manager – Northern Division**
Address:	**California American Water 4701 Beloit Drive Sacramento**
Cal Adv Request:	**A2507003 Public Advocates DR JMI-08**
Company Number:	**Cal Adv JMI-08 Q001**
Date Received:	**September 8, 2025**
Date Response Provided:	**September 22, 2025**
Subject Area:	**Northern Tank Painting Costs**

DATA REQUEST:

1. Tank Industry Consultants (TIC) provides a cost estimate for their recommended improvements in their tank inspection reports for the Rose Parade, 437 Reservoir, and North Wikiup 2.[1]

Table 1: TIC Inspection Report List of Tank Painting Repairs and Estimated Costs[2]

Tank	Item	Cost
437 Reservoir	Clean and Paint Exterior:	
	SP 6, Complete Clean, Epoxy/Polyurethane System	$ 160,000
	Containment	$ 90,000
	Heavy Metal Abatement & Disposal	$ 15,000
	Clean and Paint Interior:	
	SP 10, 3-Coat Epoxy System	$ 215,000
	Heavy Metal Abatement & Disposal	$ 20,000
Rose Parade Tank	Clean and Paint Exterior:	
	Spot Repair and Topcoat	$ 600,000
	Containment	$ 100,000
	Clean and Paint Interior:	
	SP 10, 3-Coat Epoxy System	$ 1,000,000
	Clean and Paint Exterior:	

[1] CAW Response Cal Am JMI-02 Q1 Att 10 437 Reservoir Redacted at pdf p. 17. CAW Response Cal Am JMI-02 Q1 Att 11 Rose Parade Redacted at pdf p. 20. CAW Response Cal Am JMI-02 Q1 Att 12 North Wikiup Redacted at pdf p. 22.
[2] CAW Response Cal Am JMI-02 Q1 Att 10 437 Reservoir Redacted at pdf p. 17. CAW Response Cal Am JMI-02 Q1 Att 11 Rose Parade Redacted at pdf p. 20. CAW Response Cal Am JMI-02 Q1 Att 12 North Wikiup Redacted at pdf p. 22.

North Wikiup Tank #2	Spot Repair and Topcoat	$	105,000
	Containment	$	100,000
	Heavy Metal Abatement & Disposal	$	10,000
	Clean and Paint Interior:		
	SP 10, 3-Coat Epoxy System	$	290,000
	Heavy Metal Abatement & Disposal	$	25,000

a) Please provide a cost breakdown of each item from Table 1 in Microsoft Excel format using the template illustrated below and explain how the unit costs are calculated. Include all support documentation used as a cost basis to calculate the unit costs, excluding the tank inspection reports provided in response to data request JMI-002.

Tank	Item	Breakdown Item	Unit	Quantity	Unit Cost	Total Cost (Quantity x Unit Cost)
437 Reservoir	Clean and Paint Exterior:					
	SP 6, Complete Clean, Epoxy/Polyurethane System					
	Containment					
	Heavy Metal Abatement & Disposal					
	Clean and Paint Interior:					
	SP 10, 3-Coat Epoxy System					
	Heavy Metal Abatement & Disposal					
Rose Parade Tank	Clean and Paint Exterior:					
	Spot Repair and Topcoat					
	Containment					
	Clean and Paint Interior:					
	SP 10, 3-Coat Epoxy System					
North Wikiup Tank #2	Clean and Paint Exterior:					
	Spot Repair and Topcoat					
	Containment					
	Heavy Metal Abatement & Disposal					
	Clean and Paint Interior:					
	SP 10, 3-Coat Epoxy System					
	Heavy Metal Abatement & Disposal					

California-American Water Company

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

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 to this request on the grounds that any benefit of receiving the information is outweighed by the undue burden of providing that information. California American Water further objects to the extent this request is overly-broad and therefore unnecessarily burdensome. Subject to, but without waiving, those objections, California American Water responds as follows:

Tank	Item	Breakdown Item	Unit	Quantity	Unit Cost	Total Cost (Quantity x Unit Cost)
Rose Parade Tank	Clean and Paint Exterior:					
	Spot Repair and Topcoat	Surface prep, spot repair and topcoat	EA	1	$180,000.00	$180,000.00
		Testing	EA	1	$30,000.00	$30,000.00
		Labor + Equipment + Scaffolding	EA	1	$390,000.00	$390,000.00
					Total:	$600,000
	Containment	Containment Materials, air handling, dehumidification	EA	1	$25,000	$25,000
		Labor + Equipment	EA	1	$40,000	$40,000
		Permitting	EA	1	$10,000	$10,000
		Blasting and Disposal	EA	1	$25,000	$25,000
					Total:	$100,000
	Clean and Paint Interior:					
	SP 10, 3-Coat Epoxy System	SP 10, 3-Coat Epoxy	EA	1	$250,000	$250,000
		Labor + Equipment	EA	1	$450,000	$450,000
		Blasting and Disposal	EA	1	$250,000	$250,000
		Testing	EA	1	$50,000	$50,000
					Total:	$1,000,000

Tank	Item	Breakdown Item	Unit	Quantity	Unit Cost	Total Cost (Quantity x Unit Cost)
North Wikiup Tank #2	Clean and Paint Exterior:					
	Spot Repair and Topcoat	Surface prep, spot repair and topcoat	EA	1	$31,200	$31,200
		Testing	EA	1	$5,200	$5,200
		Labor + Equipment + Scaffolding	EA	1	$67,600	$67,600
					Total:	$104,000
	Containment	Containment Materials, air handling, dehumidification	EA	1	$25,000	$25,000
		Labor + Equipment	EA	1	$40,000	$40,000
		Permitting	EA	1	$10,000	$10,000
		Blasting and Disposal	EA	1	$25,000	$25,000
					Total:	$100,000
	Heavy Metal Abatement & Disposal	Blasting and Disposal	EA	1	$5,000	$5,000
		Abatement	EA	1	$5,000	$5,000
					Total:	$10,000
	Clean and Paint Interior:					
	SP 10, 3-Coat Epoxy System	SP 10, 3-Coat Epoxy	EA	1	$72,500	$72,500
		Labor + Equipment	EA	1	$130,500	$130,500
		Blasting and Disposal	EA	1	$72,500	$72,500
		Testing	EA	1	$14,500	$14,500
					Total:	$290,000
	Heavy Metal Abatement & Disposal	Blasting and Disposal	EA	1	$12,500	$12,500
		Abatement	EA	1	$12,500	$12,500
					Total:	$25,000

For Tank 437 in Hillview, California American Water intends to replace Tank 437 with two smaller tanks, each 250,000 gallons. Therefore, no rehabilitation costs are proposed for Tank 437. See response to Cal Adv JMI-08 Q002 for more information.

Please note, the cost estimate provided by TIC is based on hundreds of tanks inspected and rehabilitated across the country. It also does not include any structural repairs or

replacements that may be found necessary upon draining and accessing the tank prior to performing the work.

Per TIC inspection reports: "Tank Industry Consultants has no control over the cost of labor, materials, or equipment, or over the contractors' methods of determining prices, or over competitive bidding, or the market conditions. Opinions of probable cost, as provided for herein, are to be made on the basis of our experience and qualifications and represent our best judgment as design professionals familiar with the design, maintenance, and construction of concrete and steel plate structures. However, Tank Industry Consultants cannot and does not guarantee that proposals, bids, or the construction cost will not vary from opinions of probable cost prepared for the Owner. Due to the numerous potential scopes of work that exist, the Owner should obtain an updated budget estimate once the final scope of work has been determined. This would enable the Owner to accurately budget monies for additional mobilization costs and damaged coating rehabilitation costs."

California-American Water Company

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

Response Provided By:	**J. Aman Gonzalez**
Title:	**Principal Engineer, Project Delivery**
Address:	**California American Water 40312 Greenwood Way Oakhurst**
Cal Adv Request:	**A2507003 Public Advocates DR JMI-08**
Company Number:	**Cal Adv JMI-08 Q002**
Date Received:	**September 8, 2025**
Date Response Provided:	**September 22, 2025**
Subject Area:	**Northern Tank Painting Costs**

DATA REQUEST:

2. Regarding the Hillview Area Tank Replacement Program (I15-670005) that was proposed in the 2022 rate case, Cal Am stated that it will replace tanks in the Hillview area for all tanks that were installed prior to 2017.[1] One of the tanks includes the 437 Reservoir.[2]

a) Please confirm if it is still Cal Am's intention to replace the 437 Reservoir.
b) If Cal Am is planning on replacing the 437 Reservoir, is it Cal Am's plan to build a comparable sized tank, larger tank, or multiple smaller tanks? What will be the volume of the new tank(s)?
c) If Cal Am is planning on replacing the 437 Reservoir, has any work been done on replacing the tank? If yes, please provide percentages of each work completed with supporting documents.
d) If Cal Am is planning on replacing the 437 Reservoir, when will the new tank(s) be in service?

CAL-AM'S RESPONSE

California American Water incorporates its general objections as if each is stated fully here. California American Water further objects to the extent this request is vague and ambiguous. Subject to, but without waiving, these objections, California American Water responds:

a) Yes, it is California American Water's intention to replace Tank 437 with two 250,000-gallon tanks.

[1] A.22-07-001, Direct Testimony of Ian C. Crooks at 230.
[2] A.22-07-001, Direct Testimony of Ian C. Crooks at 231.

b) See response (a). California American Water is planning to replace the tank with two 250,000-gallon tanks.
c) The only work completed to date is a survey of the site to determine what additional property will be needed to accommodate the two proposed tanks. See attached site plan, CAW Response Cal Adv JMI-08 Q002 Attachment 1.
d) An estimated schedule is as follows: additional property negotiation and purchase in 2025/2026, design in 2026, construction in 2027-2028, tanks in service 2028.

Attachment 1-5: A2507003 Cal Advocates DR JMI-11 (Tank Rehabilitation Northern)

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 JMI-11

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Attorneys for California-American Water Company

Dated: October 9, 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 JMI-11 ("Data Requests" or "RPD"), propounded on September 25, 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:	**J. Aman Gonzalez**
Title:	**Principal Engineer, Project Delivery**
Address:	**California American Water 40312 Greenwood Way Oakhurst**
Cal Adv Request:	**A2507003 Public Advocates DR JMI-11**
Company Number:	**Cal Adv JMI-11 Q001**
Date Received:	**September 25, 2025**
Date Response Provided:	**October 9, 2025**
Subject Area:	**Tank Rehabilitation Northern**

DATA REQUEST:

1. Refer to Engineering Workpaper #113, regarding the Storage Tank Improvement Program (I15- 600128) project that was submitted on July 1, 2025 with Cal Am's GRC Application (A.)25-07- 003.[1]

a. Table A5-2 (Tank Rehabilitation Recommendations) states that Cal Am plans tank rehabilitation improvements for Site 9 Tanks 1 and 2 between 2027-2032.[2] In the last rate case, A.22-07-001, Cal Am provided the tank inspection reports in response to data request JMI-004 (Hillview Tanks).[3] The inspection reports for Site 9 Tanks 1 and 2 are dated August 3, 2021.[4] A copy of these inspection reports are provided as part of the data request.[5] Please confirm that these are the most recent tank inspection reports for Site 9 Tanks 1 and 2. If an inspection report was prepared for these tanks after August 3,2021, please provide the tank inspection reports.

b. Table A5-2 (Tank Rehabilitation Recommendations) states that Cal Am plans tank rehabilitation improvements for Vista Heights between 2027-2032.[6] In the last rate case, A.22-07-001, Cal Am provided the tank inspection reports in response to data request JMI- 004 (Hillview Tanks).[7] The inspection reports

[1] Engineering Workpaper #113 Northern (NOR) Tanks (Engineering Workpaper #113).
[2] Engineering Workpaper #113 at pdf p. 6.
[3] Cal Am Response to Public Advocates Office Data Request JMI-004 (Hillview Tanks) (A.22-07-001).
[4] CAW Response Cal ADV JMI 04 Q001 Attachment 10 – Site 9 Tank 1 Evaluation Report Redacted at 1. CAW Response Cal ADV JMI 04 Q001 Attachment 11 – Site 9 Tank 2 Evaluation Report Redacted at 1.
[5] CAW Response Cal ADV JMI 04 Q001 Attachment 10 – Site 9 Tank 1 Evaluation Report Redacted. CAW Response Cal ADV JMI 04 Q001 Attachment 11 – Site 9 Tank 2 Evaluation Report Redacted.
[6] Engineering Workpaper #113 at pdf p. 6.
[7] Cal Am Response to Public Advocates Office Data Request JMI-004 (Hillview Tanks) (A.22-07-001).

for Vista Heights Tanks 1 and 2 are dated July 31, 2021.[8] A copy of these inspection reports are provided as part of the data request.[9]

i. Which tank at Vista Heights is Cal Am planning rehabilitation improvements in this GRC?

ii. Please confirm that the inspection reports dated July 31, 2021 are the most recent tank inspection reports for Vista Heights Tanks 1 and 2. If an inspection report was prepared for these tanks after July 31, 2021, please provide these tank inspection reports.

iii. If Cal Am is planning tank rehabilitation improvements at Vista Heights that is neither Tank 1 nor Tank 2, please provide the most recent tank inspection report for the tank Cal Am is planning the tank rehabilitation improvements at Vista Heights.

c. Table A5-2 (Tank Rehabilitation Recommendations) shows six tanks (Countryside, 437 Reservoir, Site 9 Tank 1 and 2, Vista Heights, and Rose Parade).[10] In the "quantity" column, Table A5-2 shows seven tanks for the "design and design services during construction," "permitting," "environmental compliance and management," and "construction management" line items.[11] Please confirm whether the quantity for the aforementioned line items is for six or seven tanks. If the quantity is seven and not six, please provide a detailed explanation for the discrepancy.

d. Table A5-2 (Tank Rehabilitation Recommendations) states that Cal Am plans tank rehabilitation improvements for Countryside Tank between 2027-2032.[12] Table A5-2 shows a unit cost of $134,550 for tank rehabilitation recommendations for Countryside Tank.[13] Cal Am provided the tank inspection report of the Countryside Tank in response to data request DKG-13.[14] The inspection report was prepared by Tank Industry Consultants (TIC) and states that the inspection report is a first year anniversary evaluation dated February 9, 2021.[15] In other TIC tank inspection reports, there are sections of the report related to economic factors, which lists the complete list of repairs and the associated repair costs. For example, the recommended

[8] CAW Response Cal ADV JMI 04 Q001 Attachment 05 – Vista Heights Tank 1 Evaluation Report Redacted at 1. CAW Response Cal ADV JMI 04 Q001 Attachment 06 – Vista Heights Tank 2 Evaluation Report Redacted at 1.
[9] CAW Response Cal ADV JMI 04 Q001 Attachment 05 – Vista Heights Tank 1 Evaluation Report Redacted. CAW Response Cal ADV JMI 04 Q001 Attachment 06 – Vista Heights Tank 2 Evaluation Report Redacted.
[10] Engineering Workpaper #113 at pdf p. 6.
[11] Engineering Workpaper #113 at pdf p. 6.
[12] Engineering Workpaper #113 at pdf p. 6.
[13] Engineering Workpaper #113 at pdf p. 6.
[14] Cal Am Response to Public Advocates Office Data Request DKG-013 (Tank Maintenance Projects).
[15] CAW Response Cal ADV DKG 13 Q001 Attachment 58 – Countryside Treatment Plant at pdf p. 1.

repair cost for the Rose Parade Tank is shown below which was provided in response to data request JMI-002.[15]

i. Please refer to the TIC inspection report dated February 9, 2021. Is there a table similar to the Rose Parade Tank table provided below for the Countryside Tank? If so, please provide a copy of the table.

ii. If there is no table as requested in Question 1(d)(i) above, please provide a description of the improvements that are planned for the Countryside Tank.

iii. If there is no table as requested in Question 1(d)(i) above, explain in detail how Cal Am calculated the unit cost of $134,550 for the Countryside Tank.

1,800,000 Gallon Ground Storage Tank, "Rose Parade Tank" *Page 19*
California American Water, Sacramento, California *18.150.W1058.027*

ECONOMIC FACTORS:

Item	Cost	Life in Years
Replacement of tank with a new one	$ 3,150,000[1]	75+

The following is a complete list of repairs and estimated costs for their respective recommendations found in the RECOMMENDATION section of this report.

Item	< 1 Year	1 to 3 years	3 to 5 years
Clean and Paint Exterior:			
Spot Repair and Topcoat			$ 600,000
Containment			100,000
Clean and Paint Interior:			
SP 10, 3-Coat Epoxy System			1,000,000
Seam Sealant			8,000
Grout Repair			3,000
Replace Cathodic Protection Rectifier	$ 5,000		
Relocate Shell Manhole Hinged Support Arms			6,000
Install Additional Shell Manholes (2)			16,000
Install Additional Roof Manhole			5,000
Remove Safety Cage			1,000
Replace Vandal Deterrent			2,000
Replace Interior Ladder Top Brackets			2,000
Install Platform Self-Closing Gate	3,500		
Install Inlet Pipe Flexible Connections	3,500		
Lower Overflow Inlet	5,000		
Contingency Items	15,000		25,000
Totals	**$ 32,000**		**$ 1,768,000**

e. Table A5-2 (Tank Rehabilitation Recommendations) shows the unit costs for six tanks (Countryside, 437 Reservoir, Site 9 Tank 1 and 2, Vista Heights, and Rose Parade).[17] These costs differ from the costs shown in the

[16] CAW Response Cal ADV JMI 02 Q001 Attachment 11 Rose Parade Redacted at 19.
[17] Engineering Workpaper #113 at pdf p. 6.

inspection reports provided in response to Cal Advocates' data requests JMI-004 (from the last rate case, A.22-07-001) and JMI-002 (from this rate case).[18] The costs shown in the inspection reports and in Table A5-2 are shown in the table below.[19]

i. Are the unit costs in Table A5-2 based on the costs shown in the TIC inspection reports referred to in Question 1(d) above? If so, how were the unit costs shown in Table A5-2 calculated from the costs shown in the inspection reports.

ii. If the unit costs were not calculated using the recommendations mentioned in the TIC inspection reports, how were the unit costs shown in Table A5-2 calculated? Provide all supporting documentation.

	Table A5-2	TIC Inspection Reports		
Tank Name	Unit Cost	Recommended Costs (Excluding Tank Painting)	Attachment	Page #
Countryside	$ 134,550	See question 1d	CAW Response Cal ADV DKG 13 Q001 Attachment 58 – Countryside Treatment Plant	n/a
437 Reservoir	$ 109,250	$ 101,000	CAW Response Cal Am JMI-02 Att 10 437 Reservoir Redacted	16
Site 9 Tank 1	$ 134,550	$ 117,000	CAW Response Cal ADV JMI 04 Q001 Attachment 10-Site 9 Tank 1 Evaluation Report Redacted	15
Site 9 Tank 2	$ 134,550	$ 117,000	CAW Response Cal ADV JMI 04 Q001 Attachment 11-Site 9 Tank 2 Evaluation Report Redacted	15
Vista Heights	$ 156,975	See question 1b		

[18] Cal Am Response to Public Advocates Office Data Request JMI-004 (Hillview Tanks) (A.22-07-001). Cal Am Response to Public Advocates Office Data Request JMI-002 (Tank Maintenance).

[19] Engineering Workpaper #113 at pdf p. 6. CAW Response Cal ADV DKG 13 Q001 Attachment 58 – Countryside Treatment Plant. CAW Response Cal Am JMI-02 Att 10 437 Reservoir Redacted at 16. CAW Response Cal ADV JMI 04 Q001 Attachment 10-Site 9 Tank 1 Evaluation Report Redacted at 15 (A.22-07-001). CAW Response Cal ADV JMI 04 Q001 Attachment 11-Site 9 Tank 2 Evaluation Report Redacted at 15 (A.22-07-001). CAW Response Cal Am JMI-02 Att 11 Rose Parade Redacted at 19. For Vista Heights Tank 1, the TIC inspection report shows a recommended cost of $136,500 excluding tank painting costs (CAW Response Cal ADV JMI 04 Q001 Attachment 05-Vista Heights Tank 1 Evaluation Report Redacted at 16 (A.22-07-001)). For Vista Heights Tank 2, the TIC inspection report shows a recommended cost of $136,500 excluding tank painting costs (CAW Response Cal ADV JMI 04 Q001 Attachment 06-Vista Heights Tank 2 Evaluation Report Redacted at 16 (A.22-07-001)).

Rose Parade	$ 102,350	$ 100,000	CAW Response Cal Am JMI-02 Att 11 Rose Parade Redacted	19

CAL-AM'S RESPONSE

California American Water incorporates its General Objections as if each is asserted fully here. California American Water further objects to the extent this request asks for all documents. In doing so, it is overly broad and unduly burdensome. California American Water further objects to the extent this request is vague, ambiguous, and imprecise. Subject to, but without waiving, these objections, California American Water responds:

1.a. The 2021 tank inspection reports are the most recent inspection reports for Site 9 Tank 1 and 2.

1.b.i. The Vista Heights Tanks were in very poor condition. In 2021, Tank #3 was removed and holes in Tanks 1 and 2 were patched and both tanks were recoated. These two tanks will be re-inspected in 2026-2027 and evaluated for any further rehabilitation needs for 2027-2032.

1.b.ii. The 2021 tank inspection reports are the most recent inspection reports for the Vista Heights Tanks.

1.b.iii. See response to 1.b.i. above.

1.c. The table is not clear. Vista Heights has 2 tanks; therefore, a total of 7 tanks is correct. Countryside, 437 Reservoir, Site 9 Tank 1 and 2, Vista Heights Tank 1 and 2, and Rose Parade.

1.d.i. See table below.

ECONOMIC FACTORS:

Item	Cost	Life in Years
Replacement of tank with a new welded steel one	$650,000[1]	75+

The following is a complete list of repairs and estimated costs for their respective recommendations found in the RECOMMENDATION section of this report.

Item	< 1 Year	1 to 3 Years	3 to 5 Years
Clean and Paint Exterior:			
Spot Repair and Topcoat			$ 100,000
Containment			100,000
Clean and Paint Interior:			
SP 10, 100% Solids System			285,000
Miscellaneous Chipping and Grinding			2,000
Seam Sealing			3,000
Pit Repair			2,000
Foundation Repair			3,000
Remove Water Level Indicating Device & Install Patch Plates			5,000
Remove Safety Cage	$ 2,000		
Install New Vandal Deterrent	2,000		
Enlarge Shell Manhole to 30 in. Diameter	8,000		
Install Elastomeric Check Valve on Overflow Pipe	6,000		
Remove Chains & Install Roof Safety Railing Self-Closing Gate	4,000		
Lower Roof Safety Railing Toe Bar	2,000		
Install Second Roof Manhole	8,000		
Contingency Items	15,000		15,000
Total of Engineer's Recommendations	**$ 47,000**		**$ 515,000**

Estimates are believed to be a high average of bids that would be received in 2021.

1.d.ii. N/A.

1.d.iii. Per the table for Countryside Tank, the cost for non-painting items (excluding misc. chipping/grinding, seam sealing and pit repair) is $70,000. Adding in the estimated $65,000 cost for a flexible connection, total is $135,000, which is approximately equal to the $134,550 provided.

1.e.i. The unit costs in Table A5-2 are based on the non-painting costs in the TIC inspection reports. They are approximate as our consultant rounded costs when compiling the tank rehabilitation project budget.

1.e.ii. See response to 1.e.i.

Attachment 1-6: TIC Inspection Report Excerpts

TIC
TANK
INDUSTRY
CONSULTANTS

Engineering Water Tanks Since 1979

7740 West New York Street
Indianapolis, Indiana 46214
317 / 271-3100 - Phone
317 / 271-3300 – FAX

Pittsburgh, Pennsylvania
412 / 262-1586

El Paso, Texas
915 / 790-0790

San Luis Obispo, California
805 / 538-4206

August 13, 2021

SUBJECT:

The subject of this report is the field evaluation of the 25,000 gallon welded steel standpipe in Oakhurst, California. The tank was owned by California American Water and was known as the "Vista Heights Tank 1." The field evaluation was performed on July 31, 2021 by Jamie L. Stewart, NACE Coating Inspector Level 2 – Certified, Certificate No. 64809; and James Birmingham of Tank Industry Consultants. The Owner's representative on the site at the time of the field evaluation was Justin Demeusy. The self-supported dome-roof tank was of welded steel construction. According to measurements taken in the field, the tank diameter was approximately 12 ft and the nominal shell height was approximately 26 ft.

OBJECTIVE:

The purpose of this evaluation was to determine the condition of the tank interior, exterior, exposed foundation, and accessories. As the tank could not be drained for the field evaluation, the interior was evaluated by a remotely operated vehicle (ROV). Therefore, only the shell and floor surfaces visible by use of the ROV were observed. The purpose of this report is to present the findings of the evaluation to identify structural, sanitary, and safety deficiencies, and to make recommendations for recoating, repairing, corrosion protection, and maintenance. Budget estimates for the work, anticipated life of the coating and the structure, and the replacement cost of the tank are also included.

AUTHORIZATION:

This evaluation and report were authorized in Master Services Agreement No. 440002207 between California-American Water Company and Tank Industry Consultants, Inc., Task Order No. 32515 dated June 11, 2021 and signed by Lacy Carothers, Engineering Manager, and in American Water Purchase Order No. 3000509755 dated June 18, 2021.

EXECUTIVE SUMMARY:

The coatings on the tank exterior were in fair to poor overall condition and should be replaced within the next 3 to 5 years. The coatings on the tank interior were in very poor condition, and vertical groove pitting was present. Tank Industry Consultants believes that the tank interior should be repainted within the next year if the tank is not replaced. The extent of corrosion and metal loss throughout the tank has likely compromised the structural integrity of the tank. Tank replacement will likely be a better economical and long-term solution. The tank should be operated at two-thirds capacity until such time as the tank can be replaced.

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Pittsburgh, Pennsylvania
412 / 262-1586

El Paso, Texas
915 / 790-0790

San Luis Obispo, California
805 / 538-4206

August 13, 2021

SUBJECT:

The subject of this report is the field evaluation of the 20,000 gallon welded steel standpipe in Oakhurst, California. The tank was owned by California American Water and was known as the "Vista Heights Tank 2." The field evaluation was performed on July 31, 2021 by Jamie L. Stewart, NACE Coating Inspector Level 2 – Certified, Certificate No. 64809; and James Birmingham of Tank Industry Consultants. The Owner's representative on the site at the time of the field evaluation was Justin Demeusy. The self-supported dome-roof tank was of welded steel construction. According to measurements taken in the field, the tank diameter was approximately 13 ft and the nominal shell height was approximately 20 ft 5 in.

OBJECTIVE:

The purpose of this evaluation was to determine the condition of the tank interior, exterior, exposed foundation, and accessories. As the tank could not be drained for the field evaluation, the interior was evaluated by a remotely operated vehicle (ROV). Therefore, only the shell and floor surfaces visible by use of the ROV were observed. The purpose of this report is to present the findings of the evaluation to identify structural, sanitary, and safety deficiencies, and to make recommendations for recoating, repairing, corrosion protection, and maintenance. Budget estimates for the work, anticipated life of the coating and the structure, and the replacement cost of the tank are also included.

AUTHORIZATION:

This evaluation and report were authorized in Master Services Agreement No. 440002207 between California-American Water Company and Tank Industry Consultants, Inc., Task Order No. 32515 dated June 11, 2021 and signed by Lacy Carothers, Engineering Manager, and in American Water Purchase Order No. 3000509755 dated June 18, 2021.

EXECUTIVE SUMMARY:

Numerous leaks were observed in the tank shell. The extent of corrosion and metal loss throughout the tank has likely compromised the structural integrity of the tank. The coatings on the tank exterior were in poor condition. The coatings on the tank interior were in very poor condition, and vertical groove pitting was present. Tank Industry Consultants recommends that the tank interior and exterior be cleaned and painted within the next year; however, tank replacement will likely be a better economical and long-term solution. The tank should be operated at two-third capacity until such time as the tank can be replaced.

ECONOMIC FACTORS:

Item	Cost	Life in Years
Replacement of tank with a new welded steel one	$650,000[1]	75+

The following is a complete list of repairs and estimated costs for their respective recommendations found in the RECOMMENDATION section of this report.

Item	< 1 Year	1 to 3 Years	3 to 5 Years
Clean and Paint Exterior:			
Spot Repair and Topcoat			$ 100,000
Containment			100,000
Clean and Paint Interior:			
SP 10, 100% Solids System			285,000
Miscellaneous Chipping and Grinding			2,000
Seam Sealing			3,000
Pit Repair			2,000
Foundation Repair			3,000
Remove Water Level Indicating Device & Install Patch Plates			5,000
Remove Safety Cage	$ 2,000		
Install New Vandal Deterrent	2,000		
Enlarge Shell Manhole to 30 in. Diameter	8,000		
Install Elastomeric Check Valve on Overflow Pipe	6,000		
Remove Chains & Install Roof Safety Railing Self-Closing Gate	4,000		
Lower Roof Safety Railing Toe Bar	2,000		
Install Second Roof Manhole	8,000		
Contingency Items	15,000		15,000
Total of Engineer's Recommendations	**$ 47,000**		**$ 515,000**

Estimates are believed to be a high average of bids that would be received in 2021.

[1] The replacement estimate includes costs associated with new tank fabrication and erection, foundation, painting, and engineering. The budget estimate given does not include costs associated with tank demolition, site acquisition, and distribution interruptions.

Tank Industry Consultants has no control over the cost of labor, materials, or equipment, or over the contractors' methods of determining prices, or over competitive bidding, or the market conditions. Opinions of probable cost, as provided for herein, are to be made on the basis of our experience and qualifications and represent our best judgment as design professionals familiar with the design, maintenance, and construction of concrete and steel plate structures. However, Tank Industry Consultants cannot and does not guarantee that proposals, bids, or the construction cost will not vary from opinions of probable cost prepared for the Owner.

Due to the numerous potential scopes of work that exist, the Owner should obtain an updated budget estimate once the final scope of work has been determined. This would enable the Owner to accurately budget monies for additional mobilization costs and damaged coating rehabilitation costs.

Engineering and resident observation costs are not included in the Total of the Engineer's Recommendations because these fees are dependent upon the scope of work to be performed. Tank

ECONOMIC FACTORS:

Item	Cost	Life in Years
Replacement of tank with a new welded steel one	$650,000[1]	75+

The following is a complete list of repairs and estimated costs for their respective recommendations found in the RECOMMENDATION section of this report.

Item	< 1 Year	1 to 3 Years	3 to 5 Years
Clean and Paint Exterior:			
Spot Repair and Topcoat			$ 100,000
Containment			100,000
Clean and Paint Interior:			
SP 10, 100% Solids System			285,000
Miscellaneous Chipping and Grinding			2,000
Seam Sealing			3,000
Pit Repair			2,000
Foundation Repair			3,000
Remove Water Level Indicating Device & Install Patch Plates			5,000
Remove Safety Cage	$ 2,000		
Install New Vandal Deterrent	2,000		
Enlarge Shell Manhole to 30 in. Diameter	8,000		
Install Elastomeric Check Valve on Overflow Pipe	6,000		
Remove Chains & Install Roof Safety Railing Self-Closing Gate	4,000		
Lower Roof Safety Railing Toe Bar	2,000		
Install Second Roof Manhole	8,000		
Contingency Items	15,000		15,000
Total of Engineer's Recommendations	**$ 47,000**		**$ 515,000**

Estimates are believed to be a high average of bids that would be received in 2021.

1.d.ii. N/A.

1.d.iii. Per the table for Countryside Tank, the cost for non-painting items (excluding misc. chipping/grinding, seam sealing and pit repair) is $70,000. Adding in the estimated $65,000 cost for a flexible connection, total is $135,000, which is approximately equal to the $134,550 provided.

1.e.i. The unit costs in Table A5-2 are based on the non-painting costs in the TIC inspection reports. They are approximate as our consultant rounded costs when compiling the tank rehabilitation project budget.

1.e.ii. See response to 1.e.i.

ECONOMIC FACTORS:

Item	Cost	Life in Years
Replacement of tank with a new welded steel one	$600,000[1]	75+

The following is a complete list of repairs and estimated costs for their respective recommendations found in the RECOMMENDATION section of this report.

Item	< 1 Year	1 to 3 Years	3 to 5 Years
Clean and Paint Exterior:			
SP 6, Complete Clean, Epoxy/Polyurethane System		$160,000	
Containment		90,000	
[2]Heavy Metal Abatement & Disposal		15,000	
Clean and Paint Interior:			
SP 10, 3-Coat Epoxy System		215,000	
[2]Heavy Metal Abatement & Disposal		20,000	
Miscellaneous Chipping and Grinding		2,000	
Seam Sealing		2,000	
Pit Repair		2,000	
Overflow Pipe Elastomeric Check Valve	$7,000		
Install Overflow Pipe Brackets	3,000		
Exterior Ladder Replacement	4,000		
Exterior Ladder Safe-Climbing Device	2,000		
Vandal Deterrent	3,000		
Install Roof Safety Railing and Self-Closing Gate	10,000		
Replace Existing Shell Manhole	8,000		
New Shell Manhole	8,000		
Existing Roof Manhole Replacement	6,000		
New Second Roof Manhole	6,000		
Clog-Resistant Vent		8,000	
Lower Overflow Inlet	5,000		
Contingency Items	10,000	15,000	
TOTAL OF ENGINEERING RECOMMENDATIONS:	**$72,000**	**$529,000**	

Estimates are believed to be a high average of bids that would be received in 2021.

[1] The replacement estimate includes costs associated with new tank fabrication and erection, foundation, painting, and engineering. The budget estimate given does not include costs associated with tank demolition, site acquisition, and distribution interruptions.

[2] Heavy metal abatement is included in the economic factors; however, the hazardous disposal will not be required unless the abrasive residue is determined to be hazardous.

Tank Industry Consultants has no control over the cost of labor, materials, or equipment, or over the contractors' methods of determining prices, or over competitive bidding, or the market conditions. Opinions of probable cost, as provided for herein, are to be made on the basis of our experience and qualifications and represent our best judgment as design professionals familiar with the design, maintenance, and construction of concrete and steel plate structures. However, Tank Industry Consultants cannot and does not guarantee that proposals, bids, or the construction cost will not vary from opinions of probable cost prepared for the Owner.

ECONOMIC FACTORS:

Item	Cost	Life in Years
Replacement of tank with a new welded steel one	$ 250,000[1]	75+

The following is a complete list of repairs and estimated costs for their respective recommendations found in the RECOMMENDATION section of this report.

Item	< 1 Year	1 to 3 Years	3 to 5 Years
Clean and Paint Exterior:			
SP 6, Complete Clean, Epoxy/Polyurethane System	$ 30,000		
Containment	50,000		
[2]Heavy Metal Abatement & Disposal	3,000		
Clean and Paint Interior:			
SP 10, 3-Coat Epoxy System	30,000		
[2]Heavy Metal Abatement & Disposal	3,000		
Cathodic Protection System	12,000		
Miscellaneous Chipping and Grinding	5,000		
Interior Roof Seam Welding	8,000		
Pit Repair	15,000		
Install Overflow Pipe	10,000		
Install New Shell Ladder with Safe-Climbing Device	3,000		
Install Vandal Deterrent on Shell Ladder	2,000		
Install Roof Safety Railing and Self-Closing Gate at Roof Manhole	6,000		
Additional Shell Manhole	8,000		
Install Exterior Support Arm on Existing Shell Manhole Cover	2,000		
Replace Roof Manhole	8,000		
Clog-Resistant Vent	8,000		
Flexible Connections	10,000		
Contingency Items	20,000		
Total of Engineer's Recommendations	**$ 233,000**		

[1] The replacement estimate includes costs associated with new tank fabrication and erection, foundation, painting, and engineering. The budget estimate given does not include costs associated with tank demolition, site acquisition, and distribution interruptions.

[2] Heavy metal abatement is included in the economic factors; however, the hazardous disposal will not be required unless the abrasive residue is determined to be hazardous.

Tank Industry Consultants has no control over the cost of labor, materials, or equipment, or over the contractors' methods of determining prices, or over competitive bidding, or the market conditions. Opinions of probable cost, as provided for herein, are to be made on the basis of our experience and qualifications and represent our best judgment as design professionals familiar with the design, maintenance, and construction of concrete and steel plate structures. However, Tank Industry Consultants cannot and does not guarantee that proposals, bids, or the construction cost will not vary from opinions of probable cost prepared for the Owner.

Due to the numerous potential scopes of work that exist, the Owner should obtain an updated budget estimate once the final scope of work has been determined. This would enable the Owner to accurately budget monies for additional mobilization costs and damaged coating rehabilitation costs.

ECONOMIC FACTORS:

Item	Cost	Life in Years
Replacement of tank with a new welded steel one	$ 250,000[1]	75+

The following is a complete list of repairs and estimated costs for their respective recommendations found in the RECOMMENDATION section of this report.

Item	< 1 Year	1 to 3 Years	3 to 5 Years
Clean and Paint Exterior:			
SP 6, Complete Clean, Epoxy/Polyurethane System	$ 35,000		
Containment	50,000		
Clean and Paint Interior:			
SP 10, 3-Coat Epoxy System	40,000		
Cathodic Protection System	12,000		
Miscellaneous Chipping and Grinding	5,000		
Interior Roof Seam Welding	8,000		
Pit Repair	15,000		
Install New Overflow Pipe	10,000		
Install New Shell Ladder with Safe-Climbing Device	3,000		
Install Vandal Deterrent on Shell Ladder	2,000		
Install Roof Safety Railing and Self-Closing Gate at Roof Manhole	6,000		
Install 30 in. Diameter Shell Manhole	8,000		
Install Exterior Support Arm on Existing Shell Manhole Cover	2,000		
Replace Roof Manhole	8,000		
Install Clog-Resistant Vent	8,000		
Install Flexible Connections	10,000		
Contingency Items	20,000		
Total of Engineer's Recommendations	**$ 242,000**		

[1] The replacement estimate includes costs associated with new tank fabrication and erection, foundation, painting, and engineering. The budget estimate given does not include costs associated with tank demolition, site acquisition, and distribution interruptions.

Tank Industry Consultants has no control over the cost of labor, materials, or equipment, or over the contractors' methods of determining prices, or over competitive bidding, or the market conditions. Opinions of probable cost, as provided for herein, are to be made on the basis of our experience and qualifications and represent our best judgment as design professionals familiar with the design, maintenance, and construction of concrete and steel plate structures. However, Tank Industry Consultants cannot and does not guarantee that proposals, bids, or the construction cost will not vary from opinions of probable cost prepared for the Owner.

Due to the numerous potential scopes of work that exist, the Owner should obtain an updated budget estimate once the final scope of work has been determined. This would enable the Owner to accurately budget monies for additional mobilization costs and damaged coating rehabilitation costs.

Engineering and resident observation costs are not included in the Total of the Engineer's Recommendations because these fees are dependent upon the scope of work to be performed. Tank Industry Consultants performs all facets of the engineering services that would be required for this project. Estimated fees for engineering and resident observation will be furnished upon request.

ECONOMIC FACTORS:

Item	Cost	Life in Years
Replacement of tank with a new welded steel one	$ 250,000[1]	75+

The following is a complete list of repairs and estimated costs for their respective recommendations found in the RECOMMENDATION section of this report.

Item	< 1 Year	1 to 3 Years	3 to 5 Years
Clean and Paint Exterior:			
SP 6, Complete Clean, Epoxy/Polyurethane System			$ 25,000
Containment			50,000
Clean and Paint Interior:			
SP 10, 3-Coat Epoxy System	$ 30,000		
Cathodic Protection System	12,000		
Miscellaneous Chipping and Grinding	5,000		
Interior Roof Seam Sealing	5,000		
Pit Repair	12,000		
Exterior Ladder Replacement	2,000		
Exterior Ladder Safe-Climbing Device	500		
Install Overflow Pipe	10,000		
Vandal Deterrent	2,000		
Install Roof Safety Railing and Self-Closing Gate at Roof Access	6,000		
Replace Platform Safety Railing	3,000		
Install Self-Closing Gate at Platform Access Opening	3,000		
New Shell Manhole	8,000		
Install Exterior Support Arm on Existing Shell Manhole Cover	2,000		
New Roof Manhole	8,000		
Clog-Resistant Vent	8,000		
Modify Floor Pipe Penetrations	10,000		
Flexible Connection	10,000		
Contingency Items	20,000		10,000
Total of Engineer's Recommendations	**$ 156,500**		**$ 85,000**

Estimates are believed to be a high average of bids that would be received in 2021.

[1] The replacement estimate includes costs associated with new tank fabrication and erection, foundation, painting, and engineering. The budget estimate given does not include costs associated with tank demolition, site acquisition, and distribution interruptions.

Tank Industry Consultants has no control over the cost of labor, materials, or equipment, or over the contractors' methods of determining prices, or over competitive bidding, or the market conditions. Opinions of probable cost, as provided for herein, are to be made on the basis of our experience and qualifications and represent our best judgment as design professionals familiar with the design, maintenance, and construction of concrete and steel plate structures. However, Tank Industry Consultants cannot and does not guarantee that proposals, bids, or the construction cost will not vary from opinions of probable cost prepared for the Owner.

ECONOMIC FACTORS:

Item	Cost	Life in Years
Replacement of tank with a new welded steel one	$ 250,000[1]	75+

The following is a complete list of repairs and estimated costs for their respective recommendations found in the RECOMMENDATION section of this report.

Item	< 1 Year	1 to 3 Years	3 to 5 Years
Clean and Paint Exterior:			
SP 6, Complete Clean, Epoxy/Polyurethane System	$ 25,000		
Containment	50,000		
Clean and Paint Interior:			
SP 10, 3-Coat Epoxy System	30,000		
Cathodic Protection System	12,000		
Miscellaneous Chipping and Grinding	5,000		
Interior Roof Seam Sealing	5,000		
Pit Repair	15,000		
Weld Steel Patch Plates over Openings in Shell and Roof	20,000		
Exterior Ladder Replacement	2,000		
Exterior Ladder Safe-Climbing Device	500		
Vandal Deterrent	2,000		
Install Overflow Pipe	10,000		
Install Roof Safety Railing and Self-Closing Gate at Roof Access	6,000		
Replace Platform Safety Railing	3,000		
New Shell Manhole	8,000		
Install Exterior Support Arm on Existing Shell Manhole Cover	2,000		
New Roof Manhole	8,000		
Clog-Resistant Vent	8,000		
Flexible Connection	10,000		
Contingency Items	20,000		
Total of Engineer's Recommendations	**$ 241,500**		

[1] The replacement estimate includes costs associated with new tank fabrication and erection, foundation, painting, and engineering. The budget estimate given does not include costs associated with tank demolition, site acquisition, and distribution interruptions.

Tank Industry Consultants has no control over the cost of labor, materials, or equipment, or over the contractors' methods of determining prices, or over competitive bidding, or the market conditions. Opinions of probable cost, as provided for herein, are to be made on the basis of our experience and qualifications and represent our best judgment as design professionals familiar with the design, maintenance, and construction of concrete and steel plate structures. However, Tank Industry Consultants cannot and does not guarantee that proposals, bids, or the construction cost will not vary from opinions of probable cost prepared for the Owner.

Due to the numerous potential scopes of work that exist, the Owner should obtain an updated budget estimate once the final scope of work has been determined. This would enable the Owner to accurately budget monies for additional mobilization costs and damaged coating rehabilitation costs.

Attachment 1-7: I15-600128 Cost Estimate

Att. Table 1-5: Contingency Item in Tank Rehabilitation Improvements – Sacramento District[142]

Tank	Contingency Items
Rose Parade	$ 40,000
437 Reservoir	$ 25,000
Site 9 T1	$ 20,000
Site 9 T2	$ 20,000
Countryside	$ 30,000
Vista Heights	$30,000 (Vista Heights Tank 1) $20,000 (Vista Heights Tank 2)

[142] Cal Am Engineering Workpaper I15-600128 at 1-1; Cal Am's Response to Public Advocates Office's Data Request DKG-13, Q001 Attachment 58 – Countryside Backwash Redacted at 17; Cal Am's Response to Public Advocates Office's Data Request JMI-02, Attachment 10 437 Reservoir Redacted at 16; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 10-Site 9 Tank 1 Evaluation Report Redacted at 15; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 11-Site 9 Tank 2 Evaluation Report Redacted at 15; Cal Am's Response to Public Advocates Office's Data Request JMI-02, Attachment 11 Rose Parade Redacted at 19; A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 05-Vista Heights Tank 1 Evaluation Report Redacted at 16. For Vista Heights Tank 1, the TIC inspection report shows a recommended cost of $136,500 excluding tank painting costs. A.22-07-001, CAW Response Cal ADV JMI 04 Q001 Attachment 06-Vista Heights Tank 2 Evaluation Report Redacted at 16. For Vista Heights Tank 2, the TIC inspection report shows a recommended cost of $136,500 excluding tank painting costs. Cal Advocates Data Request A2507003 Public Advocates DR JMI-11 (Tank Rehabilitation Northern); Cal Am's Response to Public Advocates Office's Data Request JMI-11, October 9, 2025

Att. Table 1-6: 2027-2032 Tank Rehabilitation Project Cost Estimate – I15-600128[143]

		Cal Am			Cal Advocates		
Tank Name	Units	Quantity	Unit Cost	Total Cost	Quantity	Unit Cost	Total Cost
Countryside	LS	1	$134,550	$ 134,550	1	$104,550	$ 104,550
437 Reservoir	LS	1	$109,250	$ 109,250	0	$ -	$ -
Site 9 Tank	LS	1	$134,550	$ 134,550	1	$114,550	$ 114,550
Site 9 Tank	LS	1	$134,550	$ 134,550	1	$114,550	$ 114,550
Vista Heights	LS	1	$156,975	$ 156,975	0	$ -	$ -
Rose Parade	LS	1	$102,350	$ 102,350	1	$ 62,350	$ 62,350
Construction Subtotal				$ 772,225			$ 396,000
Design and Design Services During Construction	LS	6	$ 13,000	$ 78,000	4	$ 13,000	$ 52,000
Permitting	LS	6	$ 3,000	$ 18,000	4	$ 3,000	$ 12,000
Environmental Compliance and Management	LS	6	$ 6,000	$ 36,000	4	$ 6,000	$ 24,000
Construction Management	LS	6	$ 13,000	$ 78,000	4	$ 13,000	$ 52,000
Total				$ 982,225			$ 536,000

Att. Table 1-7: 2027-2028 Cost Estimate – I15-600128[144]

Item	Cal Am	Cal Advocates
Storage Tank Improvement Recommendations	$ 11,518,941	$ 11,518,941
Tank Rehabilitation Recommendations	$ 982,225	$ 536,000
2027-2032 Direct Total	$ 12,501,166	$ 12,054,941
Δ%		3.57%

For RO Model[145]

I15-600128	2027	2028
Proposed	$ 114,000	$ 1,194,000
Cal Advocates	$ 109,930.81	$ 1,151,380.56

[143] Cal Am Engineering Workpaper I15-600128 at 1-1.

[144] Cal Am Engineering Workpaper I15-600128 at 1-2, 1-1.

[145] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5."

Attachment 1-8: A2507003 Cal Advocates DR JMI-10 (GRIP Projects)

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 JMI-10

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Attorneys for California-American Water Company

Dated: September 26, 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 JMI-10 ("Data Requests" or "RPD"), propounded on September 12, 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:	**Richard Saldivar**
Title:	**Project Manager**
Address:	**California American Water 655 West Broadway #1410 San Diego**
Cal Adv Request:	**A2507003 Public Advocates DR JMI-10**
Company Number:	**Cal Adv JMI-10 Q001**
Date Received:	**September 12, 2025**
Date Response Provided:	**September 26, 2025**
Subject Area:	**GRIP Projects**

DATA REQUEST:

Please highlight any confidential information in the questions below and accompanying responses in grey.

1. Regarding the Energy Storage United States Department of Energy (DOE)'s Grid Resilience and Innovation Partnerships Program (GRIP) projects in the Northern, Central, and Southern Divisions (I15-600120, I15-400168, and I15-500084, respectively):

   a. Cal Am states that the GRIP Program will reimburse the company up to [half of the] full investment if all program requirements are achieved.[1] What are the program requirements contingent to receiving reimbursement? Are these requirements measured on an individual site basis, district basis, or companywide?
   b. What are the parameters used to determine whether the program requirements are achieved? Are these parameters measured on an individual site basis, district basis, or companywide?
   c. If Cal Am is only able to achieve a portion of the program requirements, how does that affect the amount of funding being reimbursed?
   d. Generac states that Cal Am provided a list of sites to participate in Generac's GRIP program in the GRIP project summary prepared by Generac which was provided in response to data request DKG-01.[2] Page 11 of the GRIP project summary shows Cal Am's preliminary site list.[3] For the following capital projects, which sites does Cal Am plan on installing battery energy storage systems

[1] Engineering Workpaper #108 I15-600120 Northern (NOR) GRIP (Engineering Workpaper #108) at pdf p. 2.
[2] CAW Response Cal Adv DKG-01 Q3.b Att 1 CONFIDENTIAL at 11.
[3] CAW Response Cal Adv DKG-01 Q3.b Att 1 CONFIDENTIAL at 11.

(BESS)? If Cal Am is installing BESS at sites outside the preliminary site list as part of the GRIP projects, please include a list of those sites in your response.
   i. I15-600120.
   ii. I15-400168.
   iii. I15-500084.

e. Page 11 of the GRIP project summary provided in response to data request DKG-01 shows Cal Am's preliminary site list.[4] One of the columns in the table is labeled "Annual megawatt-hour (MWh)."
   i. Are the values shown in this column recorded or design? If these values are recorded, what was the recorded duration period?
   ii. For the line items 45 (Ditton Well 2 and booster pump station (BPS)) and 46 (Forest Ridge Water Treatment Plant (WTP) and Ditton) in the preliminary site list,[5] the utility and annual MWh columns are labeled "[blank]." Please fill in the blanks.

f. In the GRIP project summary prepared by Generac, it shows a Generac-California Water Association (CWA) project development timeline.[6] In the timeline, it states in the first quarter of 2025, Generac began negotiations with the DOE to finalize the GRIP grant contract.[7]
   i. What is the status of the GRIP grant contract?
   ii. Is the funding from the GRIP grant contract currently available?
   iii. If the GRIP grant contract remains unavailable, will Cal Am still pursue the GRIP projects?

CAL-AM'S RESPONSE

California American Water incorporates its general objections as if each is asserted fully here. California American Water further objects to the extent this request is vague and ambiguous, particularly as to the phrase "requirements contingent to receiving." Subject to, but without waiving, these objections, California American Water responds:

1. a. In this case, "program requirements" refers to the successful completion of milestones associated with deployment of the battery microgrid projects: (a) Site Selection and Design, (b) Permitting and Siting, (c) Equipment Procurement, (d) Construction and Deployment, (e) Testing and Commissioning. Funding from the DOE GRIP program will be released as projects move through this development pipeline. Additionally, sites will be pre-approved for eligibility to significantly

[4] CAW Response Cal Adv DKG-01 Q3.b Att 1 CONFIDENTIAL at 11.
[5] CAW Response Cal Adv DKG-01 Q3.b Att 1 CONFIDENTIAL at 11.
[6] CAW Response Cal Adv DKG-01 Q3.b Att 1 CONFIDENTIAL at 7.
[7] CAW Response Cal Adv DKG-01 Q3.b Att 1 CONFIDENTIAL at 7.

minimize the risk of not receiving reimbursement for completed work. There are no specific program requirements for individual sites, aside from the fundamental requirement of being a battery microgrid project sited at water / wastewater utility locations. At the program level, Generac has additional operational and reporting requirements as well as a requirement to achieve certain portfolio metrics (such as total budget and battery storage capacity). Note that Generac's contract with the Department of Energy is not final and could be subject to change. In addition, Generac has experience in administering these Department of Energy grants in two other projects with a total budget of $250M. As a result, there is experience in managing and achieving the required DOE project milestones for successful (and complete) disbursement of grants funds.

1. b. On an individual site basis, sites will be pre-approved for eligibility and funding and that is expected to be released following the Testing and Commissioning milestone, during which the installed system will be tested and validated for communications and control. The site must continue to be operational until the end of the reporting period (five years from program start).

1. c. Cal Am does not have any specific program requirements. As stated above, once individual projects complete testing and commissioning, the full funding (up to 50% of eligible project costs) will be released. If Cal Am is unable to meet the committed $8,000,000 of match funds for any reason, Generac will facilitate the transfer of project funds to other water utilities.

1. d. Site selection is part of the initial phase of the GRIP project and has not been finalized at this time. Generac will complete energy modelling for each site, provide a recommended battery size, and assess the resilience and cost savings impact each installation will have. Individual sites will be pre-approved by the DOE and approved by Cal Am prior to completing design, permitting, procurement, construction, and commissioning.

1. e. i. "Annual MWh" refers to the total electricity consumed by the site over a single year. This is based on recorded data over at least 12 months and was obtained either from historical interval data and/or electricity bills.

1. e. ii. This information has not yet been requested from PG&E

California-American Water Company

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

1. f. i. In December 2024, the DOE and Generac executed a conditional contract for the GRIP award funding amount. The conditional contract was then to be further negotiated between the parties to execute the final contract. These negotiations are largely focused on establishing the final project milestones and associated program commitments to be achieved by those milestones. That process began in Q1 2025 and then was placed on hold due to an Executive Order requiring the DOE to complete a full review of all GRIP Projects. This has delayed on-going negotiations.

1. f. ii. In June 2025, the DOE made a Data Request to all GRIP project awards to summarize and address a standard set of questions from the DOE. That submission was made by Generac in June 2025. The DOE has not committed to a specific response date on that submission. However, Generac is aware of other GRIP projects which are beginning to receive feedback from the DOE in September 2025. Based on separate discussions with the DOE from the other two Generac GRIP projects under contract, Generac expects to hear guidance from the DOE on this project in the coming weeks.

1. f. iii. If DOE GRIP funds remain unavailable, Cal Am intends to pursue the identified projects via the SGIP Program.

California-American Water Company

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

Response Provided By:	**Audie Foster**
Title:	**Director Operations, Northern Division Operations**
Address:	**California American Water 4701 Beloit Drive Sacramento**
Response Provided By:	**Spencer Vartanian**
Title:	**Director of Operations, Coastal Division**
Address:	**California American Water 511 Forest Ldg Rd, Ste 100 Pacific Grove**
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 JMI-10**
Company Number:	**Cal Adv JMI-10 Q002**
Date Received:	**September 12, 2025**
Date Response Provided:	**September 26, 2025**
Subject Area:	**GRIP Projects**

DATA REQUEST:

2. Please provide the following information for each generator model name Cal Am either owns or leases in Microsoft Excel format in the template shown below.

a. Generator model.
b. District.
c. Own or lease?
d. Date of purchase or signed lease agreement.
e. Purchased cost or annual lease cost.
f. If leased, provide the lease end date.

Generator Model	District	Own or Lease?	Date of Purchase or Signed Lease Agreement	Purchase Cost or Annual Lease Cost ($)	If Leased, Provide the Lease End Date

CAL-AM'S RESPONSE

California American Water incorporates its general objections as if each is asserted fully here. California American Water further objects to the extent this request is vague and ambiguous, particularly as to the phrase "information for each generator model name." California American Water further objects on the basis the request appears overly broad, unnecessarily burdensome, and seeks information that is not relevant or reasonably calculated to lead to the discovery of relevant information. The subject area of inquiry is GRIP Projects, but the request appears to go well beyond that by seeking information for each generator across the entire company. Subject to, but without waiving, these objections, California American Water responds:

California American Water will provide an excel document providing information on 10 generators from each of the company's 3 divisions. That list is provided in CAW Response Cal Adv JMI-10 Q002 Attachment 1.

California-American Water Company

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

Response Provided By:	**Richard Saldivar**
Title:	**Project Manager**
Address:	**California American Water 655 West Broadway #1410 San Diego**
Cal Adv Request:	**A2507003 Public Advocates DR JMI-10**
Company Number:	**Cal Adv JMI-10 Q003**
Date Received:	**September 12, 2025**
Date Response Provided:	**September 26, 2025**
Subject Area:	**GRIP Projects**

DATA REQUEST:

3. Provide a copy of Cal Am's application for the California Energy Commission matching funds through the "Distributed Electricity Backup Assets (DEBA) Program.

CAL-AM'S RESPONSE

No solicitation for the DEBA Program has been issued by the California Energy Commission to date. However, in the state budget bill that was recently passed, there is an appropriation of $46.1M for DEBA, including $12.5M allocated to state cost sharing for "water utility projects that have received awards from the United States Department of Energy Grid Resilience and Innovation Partnerships program only if that federal funding is secure and in place." This appropriation subset of $12.5M may be awarded "expeditiously and non-competitively" to such projects. This $12.5M will be used as a portion of the $50M matching funds to be contributed by the participating water utilities. Generac and Cal Am will submit these DEBA applications once the solicitation is issued by the CEC.

Attachment 1-9: A2507003 Cal Advocates DR JMI-16 (Dunnigan Wastewater Improvements)

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 JMI-16

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Attorneys for California-American Water Company

Dated: December 26, 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 JMI-16 ("Data Requests" or "RPD"), propounded on December 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.

California-American Water Company

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

Response Provided By:	**Usmita Pokhrel**
Title:	**Project Manager – Northern Division**
Address:	**California American Water 4701 Beloit Drive Sacramento**
Cal Adv Request:	**A2507003 Public Advocates DR JMI-16**
Company Number:	**Cal Adv JMI-16 Q001**
Date Received:	**December 11, 2025**
Date Response Provided:	**December 26, 2025**
Subject Area:	**Dunnigan Wastewater Improvements**

DATA REQUEST:

1. Please refer to Engineering Workpaper #101, the Dunnigan Wastewater Improvements (I15-620002) from the 2022 rate case (A.22-07-001).[1] On pdf page 4 of Engineering Workpaper #101, Cal Am states that "a new electrical service will be provided by Pacific Gas and Electric Company (PG&E)."[2] Below is a screenshot of pdf page 4 of Engineering Workpaper #101.[3]

   a. Please confirm that an electrical service was installed as part of I15-620002.
   b. Please provide copies of the completion report.

[1] Engineering Workpaper #101 I15-620002 (from A.22-07-001) (Engineering Workpaper #101).
[2] Engineering Workpaper #101 at pdf p. 4.
[3] Engineering Workpaper #101 at pdf p. 4.

California American Water
Dunnigan Wastewater System

Pump Station Replacement

Need for Project:

The Dunnigan Wastewater system consists of gravity collection, one raw wastewater pump station, treatment ponds and disposal ponds. Currently the wastewater pump station is in danger of failing mechanically and electrically in addition to being totally non-code compliant. Due to its location, method of construction and materials of construction, it was determined that relocating the pump station to a more accessible site and construction of a new precast packaged pump station would be the most cost effective and safe solution to address the dilapidated nature of the existing pump station.

Background:

Upon reviewing condition of the existing Wastewater Pump Station it was determined that it would need a significant amount of work to correct not only major safety issues but also to allow for routine maintenance. The existing submersible pumps are not installed on rails and can only be removed by using and existing chain hoist, which is a safety issue. Upon further evaluation it has been determined that the wet well is approximately 25-feet deep. The bottom of the wet well or the sump section consists of a riveted tank, approximately 8 feet in diameter that was installed horizontal, with access for the pumps being through a 24-inch diameter flanged outlet on the side of the tank which was rotated up during placement. The upper or access portions of the wet well was constructed using a 36-inch diameter culvert. The only restriction to access to the wet well is currently provided by a steel plate that is slid into position with not provisions for securing it in place and there is no OHSA safety grate below it.

This facility is located in an area with very restricted access for maintenance vehicles, etc. It is also located adjacent to a building that contains the electrical controls for the pump station and a 4160 Volt metering and switch enclosure. Adjacent to the wet well site is a split box and underground conduits that contain 4160 V feeder lines that sever several step down transformers in the adjacent mobile home park. These high voltage lines on the customer's side of the meter have a significant impact on attempting any underground construction near the existing wastewater pump station.

Recommended Solution:

Currently, property to the south of the existing pump station is being development as a commercial development Grant Park, which includes several fast food restaurants and a petrol station and minimart. Plans for the first phase of Grant Park include a sewer line from the development to the location of the new wastewater prefabricated wet well pump station that is being constructed as part of the project. This new pump station is being constructed by the contractor for Grant Park and will be located in an open area that will greatly improve physical access for operations and maintenance. A new electrical service will be provided by PG&E.

California-American Water Company

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

CAL-AM'S RESPONSE

California American Water incorporates each of its General Objections as though fully stated here. California American Water further objects on the basis this request is vague and ambiguous as to the term "completion report." Subject to, but without waiving these objections, California American Water responds:

1.

a) Our records show that an electrical service was installed to support the Dunnigan Sewer Lift Station project.

b) We currently do not have a "completion report" prepared by PG&E in our files related to the new electrical service for this project.

In response to this data request, Cal Am requested PG&E provide email confirmation to verify date of energization and meter installation (see email from Brent Drawver dated 12/15/25 below).

We have also included the PG&E contract confirmation document, dated January 25, 2019.

RE: PG&E Project Completion Report-5160 HWY 99W DUNNIGAN E-PM#35050674

Drawver, Brent <B1D0@pge.com>

Reply | Reply All | Forward

CAUTION: This Message is from an External Email Address
Report Suspicious

Classification: Public

Hi Charles,

The below project, with PM#35050674, was energized and ready for service on 1/13/2020 and meter was set on 1/15/2020.

Thank you,
Brent Drawver
Senior New Business Representative
Service Planning Division
661.637.9807 cell

Pacific Gas and Electric Company

Pacific Gas and Electric Company

Pacific Gas and Electric Company
Customer Fund Management
1850 Gateway Blvd, 6th Floor
Concord, CA 94520

January 25, 2019

This is a confirmation of your contract for new PG&E service. If you have questions, please call us at 800-422-0436.

CALIFORNIA-AMERICAN WATER COMPANY
4710 BELOIT
SACRAMENTO, CA 95838

RE: MLX 285229, Notification 114527165, PM Order 35050674-E

Dear Customer,

We are writing to confirm important financial aspects of your recent electric service contract at 5160 HWY 99W, DUNNIGAN. In this contract, you opted for the Non-Refundable 50% Discount payment option.

Under this payment option, you paid half of the refundable costs in order to receive your PG&E service, less an allowance (credit), based on your anticipated usage. This allowed you to pay a lower up front deposit payment, but you are not eligible for future refunds.

In your contract, we calculated a non-residential allowance of **$2,032.78 for electric** based on a California Public Utilities Commission (CPUC)-approved formula that uses your anticipated annual energy usage and the associated net revenue (distribution) calculation, as defined by the CPUC. Each year for the first three years of your contract, we will review your accounts to ensure that your annual net revenue has continued to meet the allowance criteria. To complete these reviews, we will calculate your annual net revenue using the distribution and service components of your energy rates. Because your contract is a distribution service and extension agreement, the CPUC has specified that only distribution and service components of rates should be used to calculate the allowance, the annual net revenue and the comparison between these totals.

You will not receive a deficiency bill as long as your electric annual net revenue meets or exceeds the anticipated annual net revenue used to calculate your allowance. However, if your actual annual net revenue falls below your allowed annual net revenue during any of these three review years, we will defer deficiency billing until after the 3rd review has been completed. At that time we will determine the average revenue you generated during the 3 years of reviews and compare that to the allowance granted. If you are still deficient then we will bill you 50% of the shortfall in the allowance calculation.

If you have any questions about the terms of your Main Line Extension (MLX) contract, please call us at **800-422-0436**, Monday through Friday, between 7:00 a.m.-3:30 p.m. Thank you for being a valued Pacific Gas and Electric Company customer.

Sincerely,
Customer Fund Management
Pacific Gas and Electric Company

Attachment 1-10: FRWTP Treatment Cost Estimate

Att. Table 1-8: FRWTP Treatment Cost Estimate[146]

CALIFORNIA AMERICAN WATER
FOREST RIDGE TDS TREATMENT SYSTEM

PRELIMINARY PROJECT COST ESTIMATE

Item	Description	Qty	Unit	Unit Cost	Cost
1	Skid Mounted System	1	LS	$ 750,000	$ 750,000
2	Piping, Valving, Pumps	1	LS	$ 150,000	$ 150,000
3	Building Expansion to house treatment skid	1	LS	$ 200,000	$ 200,000
4	Sludge Tank system	2	LS	$ 115,000	$ 230,000
5	I&C Upgrades	1	LS	$ 155,000	$ 155,000
6	Electrical upgrades	1	LS	$ 275,000	$ 275,000
7	Emergency Generator	1	LS	$ 250,000	$ 250,000
8	Site Improvements including retaining wall	1	LS	$ 353,000	$ 353,000
				Total Cost	**$ 2,363,000**

NOTES:
Costs based on average of two recently installed RO systems
Contingencies and AFUDC not included.

[146] A2507003 Cal Advocates DR JMI-003 (Sacramento Water Quality), Attachment CAW Response Cal Adv JMI-03 Q001.c Attachment 1, tab: "FRWTP TDS Cost."

Attachment 1-11: I15-600125 Cost Estimate

Att. Table 1-9: 2027-2028 Cost Estimate – I15-600125[147]

Site	System	Quantity		Unit Cost	Total Cost	
		Cal Am	Cal Advocates		Cal Am	Cal Advocates
Boulder BPS	Goldside	1	1	$150,000	$ 150,000	$ 150,000
BPS at WTP	Isleton	1	1	$500,000	$ 500,000	$ 500,000
Indian Springs Well 10 and BPS	Oakhurst	1	1	$150,000	$ 150,000	$ 150,000
Vista Heights BPS	Oakhurst	1	1	$150,000	$ 150,000	$ 150,000
Forest Ridge WTP and Ditton	Oakhurst	1	0	$150,000	$ 150,000	$ -
Well 4	Oakhurst	1	1	$150,000	$ 150,000	$ 150,000
Ditton Well 2 and BPS	Oakhurst	1	1	$150,000	$ 150,000	$ 150,000
Salmon Falls Well	Suburban-Rosemont	1	1	$500,000	$ 500,000	$ 500,000
Woodman Well	Suburban-Rosemont	1	1	$500,000	$ 500,000	$ 500,000
Construction Subtotal					$2,400,000	$ 2,250,000
Design and Design Services During Construction	For $150K	6	5	$ 15,000	$ 90,000	$ 75,000
	For $500K	3	3	$ 50,000	$ 150,000	$ 150,000
Permitting		9	8	$ 5,000	$ 45,000	$ 40,000
Environmental Compliance and Management		9	8	$ 12,000	$ 117,000	$ 96,000
Construction Management		9	8	$ 25,000	$ 243,000	$ 200,000
Total (2027-2032)					$3,045,000	$ 2,811,000
Annual Total					$ 507,500	$ 468,500

[147] Cal Am Engineering Workpaper I15-600125 at 1-20, 1-21.

Attachment 1-12: SDWIS Arsenic Water Quality Data – Quail Meadows Well 2

Att. Table 1-10: SDWIS Arsenic Water Quality Data – Quail Meadows Well 2[148]

Analyte Number	Analyte Name	Sampling Date	Results			MCL	DLR	Unit	Lab Sample ID	Lab	ELAP	Method
			Detected Level	Less Than	RL							
1005	ARSENIC	10-06-2025	8		2	10	2	UG/L	76798201	AMERICAN WATER CENTRAL LABORATORY	2737	EPA 200.8
1005	ARSENIC	07-02-2025	8		2	10	2	UG/L	75495701	AMERICAN WATER CENTRAL LABORATORY	2737	EPA 200.8
1005	ARSENIC	05-14-2025	6.2		2	10	2	UG/L	AIE1833-01	BSK ANALYTICAL LABORATORIES	1180	EPA 200.8
1005	ARSENIC	04-02-2025	6.6		2	10	2	UG/L	AID0590-01	BSK ANALYTICAL LABORATORIES	1180	EPA 200.8

[148] California State Water Resources Control Board SDWIS, available at: https://sdwis.waterboards.ca.gov/PDWW/JSP/WSamplingResultsByStoret.jsp?SystemNumber=2010007&tinwsys_is_number=2701&FacilityID=039&WSFNumber=57736&SamplingPointID=039&SystemName=CAL+AM++OAKHURST&SamplingPointName=QUAIL+MEADOWS+WELL+2&Analyte=&ChemicalName=&begin_date=&end_date=&mDWW=) [accessed December 23, 2025]

Attachment 1-13: Completed Pipeline Projects – Sacramento

Att. Table 1-11: Completed Pipeline Projects – Sacramento District[149]

Unique Identifier	Street	System	Project Code	Length Replaced (LF)
I15-600111-01	SAC-Lincoln Oaks Main Replacement Auburn Blvd, Calvin Dr, Coachman Dr, Carriage Dr	Sacramento	I15-600111	17,283
I15-600111-02	SAC-East Pwy/Reubens Pwy Main Replacement	Sacramento	I15-600111	3,346
I15-640004-01	I15-640004-01 GEY-System Backbone Main Replacement Geyserville Ave, Highway 128, Chianti Road, Canyon Road highway undercrossing	Geyserville	I15-640004	11,000
I15-650004-01	MEA-Backyard Main Replacement 2025 approx. 10 residental blocks	Meadowbrook	I15-650004	10,000
I15-660002-01	FRU-Fruitridge Vista Mains Imprv 2020 Bowling Green neighborhood	Fruitridge Vista	I15-660002	36,250
I15-660002-02	FRU-Mains Replc Sampson-Dewey 2021	Fruitridge Vista	I15-660002	19,766
I15-660002-03	FRV-Fruitridge Vista Mains Imprv Program Vista Burns neighborhood	Fruitridge Vista	I15-660002	13,048
I15-660002-04	FRV-40th Street and Nona Laurine Main Replacement	Fruitridge Vista	I15-660002	15,700
I15-670010-01	HILL-Road 426 Main Replacement	Hillview	I15-670010	200
I15-670010-02	HILL-Road 427 Main Replacement	Hillview	I15-670010	342
I15-670010-03	HILL-Goldside Valve Replacements Goldside Dr, Griffin Dr	Hillview	I15-670010	tbd

[149] Cal Advocates Data Request A2507003 Public Advocates DR SIH-09 (Pipeline and Replacements III).

Attachment 1-14: Previously Funded but Not Complete Projects – Sacramento District

Att. Table 1-12: Previously Funded but Not in Service Projects – Sacramento District[150]

Project Number	Project Description	2025	2026	2027	2028
I15-600106	SAC-Isleton Storage Tank	$ 169,648.20	$ 1,187,537.40	$ 339,296.40	
I15-600108	SAC-Wittkop 2 Water Treatment Plant	$ 69,075.00	$ 368,400.00	$ 828,900.00	$ 1,036,125.00
I15-600109	SAC-Vintage 1 Treatment	$ 165,780.00	$ 386,820.00	$ 2,210,400.00	$ -
I15-600110	SAC-Malaga Well Replacement and TCP Treatment	$ 127,871.64	$ 426,238.80	$ 852,477.60	$ 2,855,799.96
I15-640003	GEY-Geyserville PSPS Generator Improvements		$ 204,093.60	$ 306,140.40	
I15-660004	FRV-South Highway 99 Crossing	$ 136,657.98	$ 364,421.28	$ 546,631.92	$ 1,229,921.82
I15-660005	FRV-Well Rehabilitation Program (2024-2026)	$ 455,895.00	$ 455,895.00	$ 469,710.00	$ -
I15-660006	FRV-Well Replacement and Installation Program (2024-2026)	$ 467,499.60	$ 545,416.20	$ 2,571,247.80	$ 3,506,247.00
I15-670003	HILL-New Goldside Iron-Manganese WTP	$ 1,103,873.76	$ 903,169.44	$ 1,338,028.80	
I15-600111	NOR-Main Replacement Program (2024-2026)			$ 4,751,917.92	$ -
I15-600113	NOR-Well Installation and Replacement Program (2024-2026)			$ 1,030,129.29	$ -
I15-600114	NOR-Well Rehabilitation Program (2024-2026)			$ 741,368.16	$ -
I15-600115	NOR-Standby Generator Improvement Program (2024-2026)			$ 690,750.00	$ 690,750.00
I15-600116	SAC-Service Saddle Replacement Program (2024-2026)			$ 326,586.60	$ -

Att. Table 1-13: Previously Funded but Not in Service Projects Original Estimated Year in Service Year – Sacramento District[151]

Project Number	Project Description	Original Estimated Year in Service
I15-600106	SAC-Isleton Storage Tank	2025
I15-600108	SAC-Wittkop 2 Water Treatment Plant	2025
I15-600109	SAC-Vintage 1 Treatment	2025
I15-600110	SAC-Malaga Well Replacement and TCP Treatment	2024
I15-640003	GEY-Geyserville PSPS Generator Improvements	2022
I15-660004	FRV-South Highway 99 Crossing	2025
I15-660005	FRV-Well Rehabilitation Program (2024-2026)	2026
I15-660006	FRV-Well Replacement and Installation Program (2024-2026)	2026
I15-670003	HILL-New Goldside Iron-Manganese WTP	2023
I15-600111	NOR-Main Replacement Program (2024-2026)	2026
I15-600113	NOR-Well Installation and Replacement Program (2024-2026)	2026
I15-600114	NOR-Well Rehabilitation Program (2024-2026)	2026
I15-600115	NOR-Standby Generator Improvement Program (2024-2026)	2026
I15-600116	SAC-Service Saddle Replacement Program (2024-2026)	2026

[150] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab "Total Direct CAPEX WS-5." Costs shown are direct project costs.

[151] A.22-07-001, Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5." For the programmatic projects, the original completion year is identified as the third year of the rate case cycle.

Attachment 1-15: Previously Funded but Cancelled Projects

Att. Table 1-14: Cancelled Projects Previously Approved by the Commission and Funded by Ratepayers[152],[153],[154]

			A.13-07-002		A.16-07-002		A.19-07-004		A.22-07-001	
Project ID	District	Project Description	Year	Total Project Cost	Year	Total Project Cost	Year	Total Project Co	Year	Total Project Cost
I15-500036	Los Angeles	LA-Rehab/Redrill Longden Well	2018	$3,994,000	2019	$4,745,780	2022	$ 4,170,406	2028	See note
I15-510017	Ventura	VEN-Connect 12" Main Between Hillcrest	2013	$ 169,000	2016	$ 169,000	2019	$ 697,879	2022	See note
I15-610024	Larkfield	LRK-PSPS Power Storage Project	n/a	n/a	n/a	n/a	n/a	n/a	2024	$ 443,165

[152] A.13-07-002, Capital Binder 040 Rehabilitate -Redrill Longden Well Project (I15-500036). A.16-07-002, Capital Investment Project (CIP) Workpaper 58 I15-500036 - Rehabilitate Redrill Longden Well. Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total CAPEX by Project WS-9" (from A.19-07-004 and A.22-07-001).

[153] A.13-07-002, Cal Am RO model file "RB 100 thru 105-2013 Statewide GRC-Ventura" tab: "SCEP Summary." A.16-07-002, Direct Testimony of F. Mark Schubert at 60-61. A.19-07-004 and A.22-07-001, Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total CAPEX by Project WS-9."

[154] Cal Am states in its A.22-07-001 Engineering Workpaper I15-500036 that the revised project costs for the Rehabilitate/Redrill Longden Well project is $4 million and does not specify whether the revised project cost is a direct or total project cost. Cal Am states in its A.22-07-001 Engineering Workpaper I15-510017 that the revised project costs for the VEN-Connect 12" Main Between Hillcrest project is $800,000 and does not specify whether the revised project cost is a direct or total project cost.

Attachment 2-1: Capital Budget Details - Larkfield

Att. Table 2-1: 2027 Capital Budget Details – Larkfield District[155]

2027	Project #	Project Description	Public Advocates Office Recommendation	Cal Am Proposed	Cal Am > Public Advocates Office	Public Advocates Office/ Cal Am
1	I15-610032	LRK-Main Replacement Program	$ 648,483	$ 699,000	$ 50,517	93%
2	I15-610033	LRK-Well 4 Rehabilitation	$ -	$ 276,300	$ 276,300	0%
3	I15-610035	LRK-Wikiup Bridge Way PRV	$ -	$ 227,487	$ 227,487	0%
4	I15610031	LRK-Larkfield Well 6	$ 534,591	$ 534,591	$ -	100%
Specifics Total			**$ 1,183,074**	**$ 1,737,378**	**$ 554,304**	**68%**
Recurring Project Total			**$ 433,000**	**$ 433,000**	**$ -**	**100%**
Projects Previously Funded but not yet Complete			**$ -**	**$ 757,799**	**$ 757,799**	**0%**
TOTAL 2027			**$ 1,616,074**	**$ 2,928,177**	**$ 1,312,103**	**55%**

Att. Table 2-2: 2028 Capital Budget Details – Larkfield District[156]

2028	Project #	Project Description	Public Advocates Office Recommendation	Cal Am Proposed	Cal Am > Public Advocates Office	Public Advocates Office/ Cal Am
1	I15-610032	LRK-Main Replacement Program	$ 1,085,444	$ 1,170,000	$ 84,556	93%
2	I15-610035	LRK-Wikiup Bridge Way PRV	$ -	$ 227,487	$ 227,487	0%
3	I15610031	LRK-Larkfield Well 6	$ 2,969,949	$ 2,969,949	$ -	100%
Specifics Total			**$ 4,055,393**	**$ 4,367,436**	**$ 312,043**	**93%**
Recurring Project Total			**$ 445,000**	**$ 445,000**	**$ -**	**100%**
Projects Previously Funded but not yet Complete			**$ -**	**$ 852,524**	**$ 852,524**	**0%**
TOTAL 2028			**$ 4,500,393**	**$ 5,664,959**	**$ 1,164,567**	**79%**

[155] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5." The project costs listed are direct project costs.

[156] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab: "Total Direct CAPEX WS-5." The project costs listed are direct project costs.

Attachment 2-2: A2507003 Cal Advocates DR JMI-06 (Larkfield PRV)

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 JMI-06

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Nicholas A. Subias
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Attorneys for California-American Water Company

Dated: August 29, 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 JMI-06 ("Data Requests" or "RPD"), propounded on August 18, 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:	**Charlie Wolfe**
Title:	**Principal Engineer, Project Delivery**
Address:	**California American Water 655 West Broadway #1410 San Diego**
Cal Adv Request:	**A2507003 Public Advocates DR JMI-06**
Company Number:	**Cal Adv JMI-06 Q001**
Date Received:	**August 18, 2025**
Date Response Provided:	**August 29, 2025**
Subject Area:	**Larkfield PRV**

DATA REQUEST:

1. Please refer to Engineering Workpaper #021, the Larkfield (LRK)- Wikiup Bridge Way Pressure Reducing Valve (PRV) (I15-610035) project that was submitted on July 1, 2025 with Cal Am's GRC Application (A.)25-07-003.[1]

a. Cal Am states that high pressure greater than 150 pounds per square inch (psi) are expected at the end of Wikiup Bridge Way, along the 8-inch Middle Wikiup Zone mainline.[2] In the last three years (2022-2024), were there any incidences where the pressure exceeded 125 psi (Yes/No)? If yes, please provide the following information in Microsoft Excel format as illustrated in the table shown below.
   i. Pressure zone.
   ii. Recorded pressure (psi).
   iii. Date of incident.
   iv. Location of incident.

Pressure Zone	Recorded Pressure (psi)	Date of Incident	Location of Incident

b. For the pressure zones mentioned in response to question 1.a, were there any complaints in the last three years (2022-2024) regarding high pressure (Yes/No)? If yes, please provide the following information for each incident in Microsoft Excel format as illustrated in the table shown below.
   i. Pressure zone.

[1] Engineering Workpaper #021 I15-610035 LKFD Wikiup PRV (Engineering Workpaper #021).
[2] Engineering Workpaper #021 at pdf p. 1.

ii. Date of incident.
iii. Location of complaint.
iv. Description of complaint.

Pressure Zone	Date of Incident	Location of Complaint	Description of Complaint
None			

c. For the pressure zones mentioned in response to question 1.a, were there any main breaks in the last three years (2022-2024) due to high pressure (Yes/No)? If yes, please provide the following information for each incident in Microsoft Excel format as illustrated in the table shown below.
i. Pressure zone.
ii. Date of incident.
iii. Location of incident.

Pressure Zone	Date of Incident	Location of Incident

d. Please refer to Table 2-2 of the Engineering Workpaper #021 which shows the estimated budget for this project.[3] Please provide a cost breakdown of each "Construction Costs" and "Soft Construction Costs" in Microsoft Excel format like the table illustrated below and explain how the unit costs are calculated. Include all support documentation used as a cost basis to calculate the unit costs below.

Table 2-2. Estimated Budget for PRV Station on Wikiup Bridge Way

Construction Costs	Value	Units	Unit Cost	Total Cost
PRV Station	1	EA	$200,000	$200,000
Connecting piping	150	LF	$1,200	180,000
Subtotal 1				$380,000
Soft Construction Costs				Total Cost
Design and Design Services During Construction	1	LS	$49,000	$49,000
Permitting	1	LS	$8,000	$8,000
Environmental Compliance and Mitigation	1	LS	$19,000	$19,000
Construction Management	1	LS	$38,000	$38,000
Subtotal 2				$114,000
TOTAL				$494,000

[3] Engineering Workpaper #021 at pdf p. 2.

Construction Cost or Soft Construction Cost	Breakdown Item	Unit	Quantity	Unit Cost	Total Cost (Quantity x Unit Cost)

CAL-AM'S RESPONSE

California American Water incorporates its general objections as each is asserted fully here. California American Water further objects to the extent this request is vague and ambiguous. Subject to, but without waiving, these objections, California American Water responds.

1 – a)

We currently do not track or collect pressure data along the Wikiup Way Bridge water main. No incidents have been recorded.

High pressures ranging from 150 psi to 170 psi at the end of Wikiup Bridge Way were observed in the hydraulic model. The model was calibrated in 2024.

b)

No customer complaints have been recorded.

c)

No main breaks have been recorded.

d)

Construction Cost or Soft Construction Cost	Breakdown Item	Unit	Quantity	Unit Cost	Total Cost (Quantity x Unit Cost)
Construction Cost	PRV Station: H20 traffic load rated pre-cast concrete vault, spring assisted hatches, vault drainage	LS	1	$200,000	$200,000

Construction Cost	Connecting Piping: HDPE piping, restrained fittings, trench section per Cal Am Standards, pavement restoration per Sonoma County standards	LF	150	$1,200	$180,000
Soft Construction Costs	Design and Design Services through Construction: PRV vault and pipeline drawings, technical specifications. construction support (bidding, product / material submittal reviews, RFI responses)	LS	1	$49,000	49,000
Soft Construction Costs	Permitting: Sonoma County encroachment permit review and fees	LS	1	$8,000	$8,000
Soft Construction Costs	Environmental Compliance and Mitigation: Asbestos cement pipe removal and disposal, pipeline disinfection lab testing	LS	1	$19,000	$19,000
Soft Construction Costs	Construction Managment: Contractor / scheduling, project management, onsite coordination, Sonoma County pavement inspections, pipeline inspections. Permit closeout.	LS	1	$38,000	$38,000
				Total Cost	$494,000

Attachment 2-3: Completed Pipeline Projects – Larkfield

Att. Table 2-3: Completed Pipeline Projects – Larkfield District[157]

Unique Identifier	Street	System	Project Code	Length Replaced (LF)
I15-610025-01	LRK-Sonoma Aqueduct Water Main Replc	Larkfield	I15-610025	5280

[157] Cal Advocates Data Request A2507003 Public Advocates DR SIH-09 (Pipeline and Replacements III).

Attachment 2-4: Previously Funded but Not Complete Projects – Larkfield District

Att. Table 2-4: Previously Funded but Not in Service Projects – Larkfield District[158]

Project Number	Project Description	2025	2026	2027	2028
I15610009	LRK-Londonberry Drive Creek Crossing	$ 94,724.85	$ 189,449.70	$757,798.80	$ 852,523.65

[158] Cal Am RO model file "ALL_CH07_PLT_RO_Forecast," tab "Total Direct CAPEX WS-5." Costs shown are direct project costs. Cal Am originally proposed I15-610009 in the 2013 rate case (A.13-07-002). Cal Am originally expected I15-610009 to be placed in service in 2016.