

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



**PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**REPORT ON THE RESULTS OF
OPERATIONS**

**WATER CONSUMPTION, RATE DESIGN, CONSERVATION
AND SPECIAL REQUESTS 5, AND 6**

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

San Francisco, California
January 23, 2026

TABLE OF CONTENTS

1	MEMORANDUM	V
2	CHAPTER 1 WATER CONSUMPTION AND PRESENT RATE	
3	REVENUES	1
4	I. INTRODUCTION	1
5	II. SUMMARY OF RECOMMENDATIONS	2
6	III. ANALYSIS	2
7	A. Average Number of Customers.....	2
8	B. Water Sales per Customer	5
9	C. Total Water Production/Non-Revenue Water	5
10	D. Other Revenues	9
11	IV. CONCLUSION	10
12	CHAPTER 2 RATE DESIGN	12
13	I. INTRODUCTION	12
14	II. SUMMARY OF RECOMMENDATIONS	13
15	III. ANALYSIS	13
16	A. Revenue Recovery: Meter Charges vs. Quantity Charges	13
17	B. Meter Service Charge.....	14
18	C. Residential Customer Rate Design.....	20
19	D. Non-Residential Customer Rate Design	40
20	E. Customer Assistance Program	41
21	F. Bill Analysis.....	43

1	IV. CONCLUSION.....	50
2	CHAPTER 3 CONSERVATION AND SPECIAL REQUESTS 5 AND 6	51
3	I. INTRODUCTION	51
4	II. SUMMARY OF RECOMMENDATIONS	51
5	III. ANALYSIS.....	52
6	A. Conservation Budget	52
7	B. Special Request 5 - Rate Mitigation, Surcharges and	
8	Mechanisms Applicable to Certain Acquired Systems.....	58
9	C. Special Request 6 - Subsequent Rate Changes	61
10	IV. CONCLUSION.....	61
11	ATTACHMENT 1-1: QUALIFICATIONS OF WITNESS.....	63
12	ATTACHMENT 1-2: CAL AM RESPONSE TO CAL ADVOCATES' TY	
13	2027 DATA REQUEST HMC-02	65
14	ATTACHMENT 2-1: MONTHLY METER CHARGES TEST YEAR 2027.....	83
15	ATTACHMENT 2-2: CAL AM RESPONSE TO CAL ADVOCATES' TY	
16	2027 DATA REQUEST HMC-01	90
17	ATTACHMENT 2-3: CAL AM RESPONSE TO CAL ADVOCATES' TY	
18	2027 DATA REQUEST HMC-05.....	115
19	ATTACHMENT 2-4: TIER BREAKPOINTS/CONSUMPTION RATIOS	
20	TY 2027	121
21	ATTACHMENT 2-5: CAL AM'S REQUESTED RATE DESIGN FOR THE	
22	NORTHERN DIVISION BUT USING THE ACTUAL WATER	
23	CONSUMPTION PATTERNS OF THE LAST RECORDED	

1	TWELVE MONTHS (JULY 2024 TO JUNE 2025) FOR TEST YEAR	
2	2027.....	124
3	ATTACHMENT 2-6: NORTHERN DIVISION RECOMMENDED RATE	
4	DESIGNS USING CAL AM'S PROPOSED SQR AND ACTUAL	
5	WATER CONSUMPTION PATTERNS OF THE LAST	
6	RECORDED TWELVE MONTHS (JULY 2024 TO JUNE 2025) TY	
7	2027.....	126
8	ATTACHMENT 2-7: NORTHERN DIVISION RECOMMENDED RATE	
9	DESIGNS USING RECOMMENDED REVENUE REQUIREMENT	
10	AND ACTUAL WATER CONSUMPTION PATTERNS OF THE	
11	LAST RECORDED TWELVE MONTHS (JULY 2024 TO JUNE	
12	2025) TY 2027.....	128
13	ATTACHMENT 2-8: CAL AM'S REQUESTED RATE DESIGN FOR THE	
14	CENTRAL DIVISION USING THE ACTUAL WATER	
15	CONSUMPTION PATTERNS OF THE LAST RECORDED	
16	TWELVE MONTHS (JULY 2024 TO JUNE 2025) TY 2027	130
17	ATTACHMENT 2-9: CENTRAL DIVISION RECOMMENDED RATE	
18	DESIGNS USING CAL AM'S PROPOSED CCCBR AND SQR AND	
19	ACTUAL WATER CONSUMPTION PATTERNS OF THE LAST	
20	RECORDED TWELVE MONTHS (JULY 2024 TO JUNE 2025) TY	
21	2027.....	132
22	ATTACHMENT 2-10: CENTRAL DIVISION RECOMMENDED RATE	
23	DESIGNS USING RECOMMENDED REVENUE REQUIREMENT	
24	AND ACTUAL WATER CONSUMPTION PATTERNS OF THE	
25	LAST RECORDED TWELVE MONTHS (JULY 2024 TO JUNE	
26	2025) TY 2027.....	134
27	ATTACHMENT 2-11: CAL AM'S SOUTHERN DIVISION REQUESTED	
28	RATE DESIGN USING ACTUAL WATER CONSUMPTION	

1	PATTERNS OF THE LAST RECORDED TWELVE MONTHS	
2	(JULY 2024 TO JUNE 2025) TY 2027.....	136
3	ATTACHMENT 2-12: SOUTHERN DIVISION RECOMMENDED RATE	
4	DESIGNS USING CAL AM'S PROPOSED SQR AND ACTUAL	
5	WATER CONSUMPTION PATTERNS OF THE LAST	
6	RECORDED TWELVE MONTHS (JULY 2024 TO JUNE 2025) TY	
7	2027.....	138
8	ATTACHMENT 2-13: SOUTHERN DIVISION RECOMMENDED RATE	
9	DESIGNS USING RECOMMENDED REVENUE REQUIREMENT	
10	AND ACTUAL WATER CONSUMPTION PATTERNS OF THE	
11	LAST RECORDED TWELVE MONTHS (JULY 2024 TO JUNE	
12	2025) TY 2027.....	140
13	ATTACHMENT 2-14: CAL AM RESPONSE TO CAL ADVOCATES' TY	
14	2024 DATA REQUEST HMC-01	142

MEMORANDUM

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

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

Chapter #	Description	Witness
1	Water Consumption and Revenues	Herbert Merida
2	Rate Design	Herbert Merida
3	Conservation and Special Requests 5, 6	Herbert Merida

CHAPTER 1 WATER CONSUMPTION AND PRESENT RATE REVENUES

I. INTRODUCTION

Determining revenues at present rates and designing reasonable water rates for Test Year (“TY”) 2027 with revenue neutrality requires an accurate forecast of customers and water consumption.¹ The revenue requirement is comprised of total estimated expenses including tax plus the Commission authorized return on rate base. Comparing the revenue at present rates with the revenue requirement yields the overall change in average system rates.

As per the Commission’s Rate Case Plan (“RCP”), utilities must forecast customer growth using a five-year average of the change in the number of customers by customer class.² A utility may make an adjustment to the five-year average if an unusual event occurs, or is expected to occur, such as implementation or removal of a limitation on the number of customers.³ Further, the applicant utility must calculate consumption by using a multiple regression to forecast per-customer usage for the residential and commercial customer classes in general rate cases, based on the New Committee Method.⁴ This method relies on Standard Practice No. U-2 and “Supplement to Standard Practice No. U-25.”⁵

Because the estimated number of customers and consumption are the basis for revenue forecasts, a comparison of Cal Am's and Cal Advocate's revenue at present rates reflects different estimates in these projections. Water supply estimates also reflect

¹ Revenue neutral rate design is achieved when the utility collects the same amount of revenue with multiple quantity rates as it would collect under a single quantity rate, as indicated in the sales forecast.

² Decision (D.)07-05-062 (Rate Case Plan), Appendix A, at A-20.

³ Rate Case Plan, Appendix A, at A-23.

⁴ Rate Case Plan, Appendix A, at A-26.

⁵ Rate Case Plan, Appendix A at A-23, fn. 4

1 changes in estimated customers and consumption as well as differences in non-revenue
2 water.

3 **II. SUMMARY OF RECOMMENDATIONS**

4 For TY 2027, the Commission should:

5 • Adopt a projected total customer average of 200,504
6 • Adopt a total water production of 37,164,028 hundred cubic feet (“CCF”).
7 • Adopt an Other Revenues amount of \$1,074,358
8 • Adopt Cal Advocates’ calculation of Cal Am’s total operating present rate
9 revenues for TY 2027 of \$374,025,225, compared to Cal Am’s estimate of
10 \$366,739,062.⁶

11 **III. ANALYSIS**

12 **A. Average Number of Customers**

13 The Commission should adopt Cal Advocates’ average number of water
14 service customers for the Test Years as presented in Table 1-1.

Table 1-1: Projected Average Number of Total Customers

Test Year	Cal Adv Recommended	Cal Am Requested ⁷	Cal Adv > Cal Am
2027	201,948	197,376	4,572
2028	204,328	197,920	6,408
2029	206,750	198,518	8,232

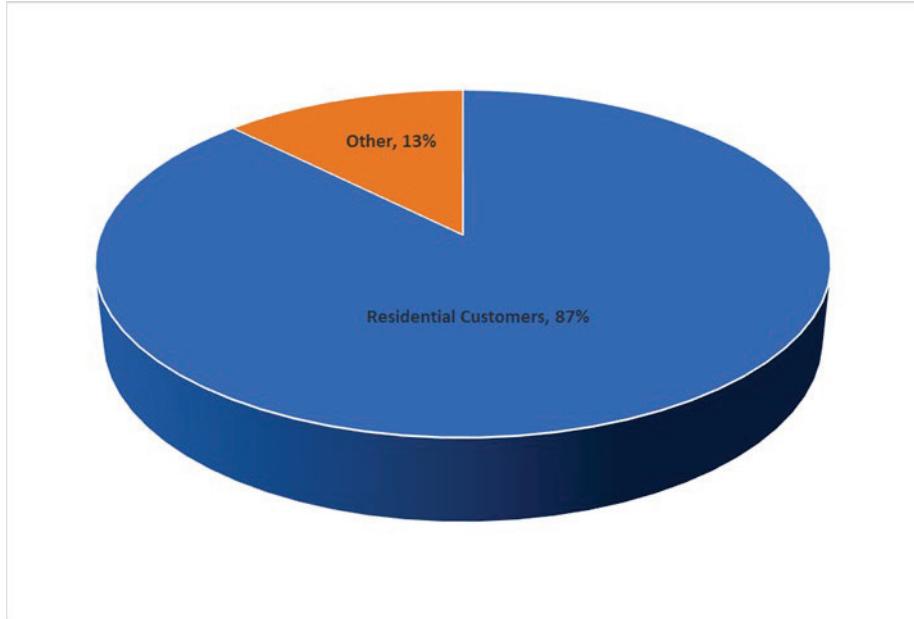
15 Cal Am’s service areas consist of a variety of customer classes including
16 residential, multi-residential, commercial, and industrial properties. Residential

⁶ *Application of California-American Water Company (U210W) to Increase Revenues in Each of its Districts Statewide*, Cal Am RO Model file “ALL_CH02_SE_RO.”

⁷ Cal Am RO Model file “All_Ch03_REV_RO_Sales-Customers,” tab: “Proj Cust by Rev System WS-04,” cells Q77, R77, S77.

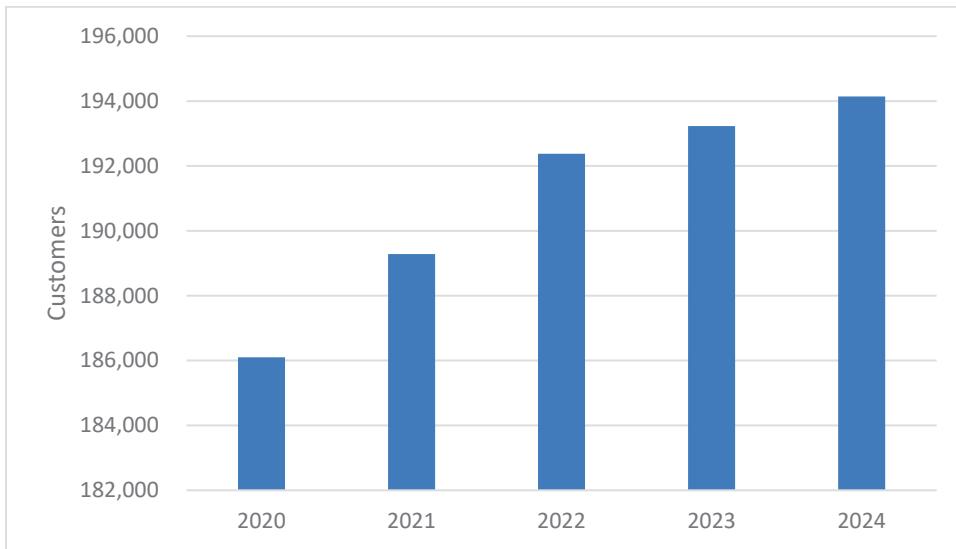
1 customers generate most of Cal Am's revenue since they comprise almost 90% of
2 Cal Am's total customers, as shown in Figure 1-1:

Figure 1-1: Cal Am Total Customers Breakdown for all Divisions



3
4 Historically, Cal Am's total customers have slowly but steadily increased at
5 approximately 1% annually. This trend is shown in Figure 1-2:

Figure 1-2: Cal Am Total Customers for all Divisions



6
7 The Cal Am customer growth rate was calculated by averaging five years
8 of previously recorded data, unless the service area or customer class was affected

1 by an “uncommon occurrence” such as the implementation or removal of a
2 limitation on the number of customers.⁸ Limitations on new service connections
3 affect the Monterey Main District in the Central Division, where Cal Am uses the
4 recorded customers from 2024 for the test years 2027 to 2029 due to the ongoing
5 new connection moratorium in the district.⁹

6 Cal Am contracted with M-Cubed to assist with customer growth forecasts.
7 M-Cubed’s forecasts are based on the average change in customer counts by class
8 over five years of recorded data (2020-2024).¹⁰

9 In most cases, Cal Am utilizes M-Cubed’s customer growth forecasts in its
10 RO Model.¹¹ However, Cal Am also deviated from the five-year average in some
11 service areas, including Sacramento, Bellflower, East Pasadena, and Piru
12 (Warring).¹² Despite the moratorium on new service connections in the Monterey
13 Main District, Monterey has increased in the number of customers over the last
14 five years.¹³ There were also some deviations from the five-year average in other
15 service areas without explanation or justification.

16 Using five years of recorded data (2020-2024) for the average change in the
17 number of customers by class in the Monterey service area is more realistic
18 because of the increase in customers over the years. The deviations that were not
19 explained or justified by Cal Am are corrected by also using the five-year average.

⁸ See, Rate Case Plan Appendix A at A-23, Per the Rate Case Plan, a utility may make an adjustment to the five-year customer average if an unusual event occurs, or is expected to occur, such as implementation or removal of a limitation on the number of customers.

⁹ *Application of California-American Water Company (U210W) to Increase Revenues in Each of its Districts Statewide*, Direct Testimony of David Mitchell, Attachment 1 at 4.

¹⁰ Direct Testimony of David Mitchell, Attachment 1 at 4.

¹¹ Cal Am RO Model file “All_Ch03_REV_RO_Sales-Customers,” tab: “Proj Cust Calc WS-03,” column AC.

¹² Direct Testimony of David Mitchell, Attachment 1 at 4.

¹³ Cal Am RO Model file “All_Ch03_REV_RO_Sales-Customers,” tab: “Proj Cust Calc WS-03,” cell Y31.

1 These adjustments produce a recommended TY 2027 forecast of 201,927 total
2 water service customers as opposed to Cal Am's requested forecasts of 197,376
3 total customers.

4 **B. Water Sales per Customer**

5 The Commission should adopt Cal Am's Conservation Adjustment for Rate
6 Tier Designs Mechanism (CART) water sales per customer recommendations for
7 all customer classes, which is different from Cal Am's application Fixed Cost
8 Recovery Account (FCRA) revenue decoupling mechanism water sales per
9 customer developed by M.Cubed.

10 For the most part, Cal Am forecasted average sales per service with
11 econometric models based on factors such as historical sales trends, season and
12 weather, number of customers, drought-related restrictions on water use, and the
13 effect of the COVID-19 pandemic.^{14, 15}

14 Cal Advocates recommends that the Commission continue to authorize the
15 CART mechanism for Cal Am.¹⁶ Thus, the CART based estimates of water sales
16 per customer are appropriate and should be used.¹⁷

17 **C. Total Water Production/Non-Revenue Water**

18 ***Total Water Production***

19 Cal Am's historical total water production has fluctuated for the last few
20 years, as shown in Figure 1-3:

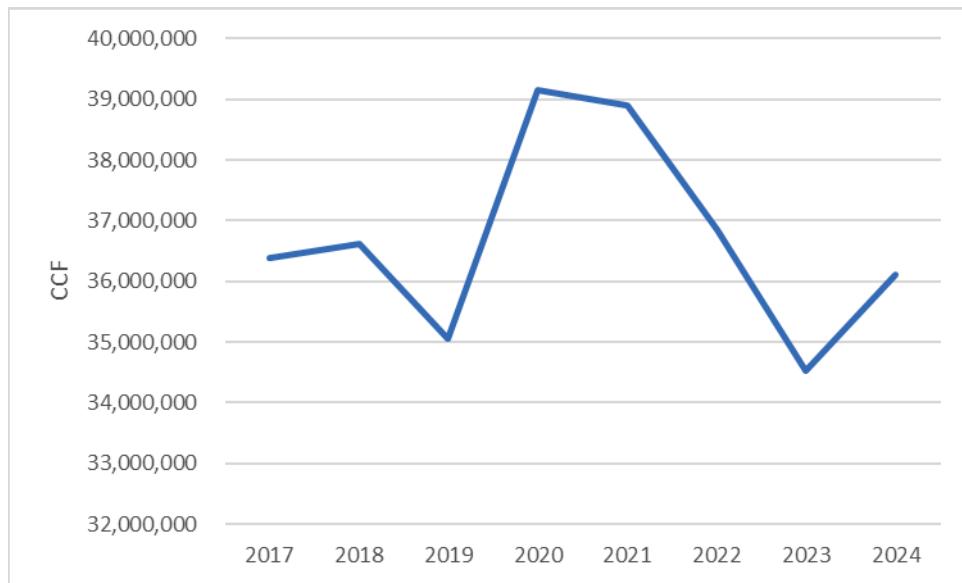
¹⁴ Econometric models use mathematical methods (especially statistics) in describing economic systems.

¹⁵ Direct Testimony of David Mitchell, Attachment 1 at 7.

¹⁶ The analysis and testimony of Cal Advocates' witness Sam Lam address the CART.

¹⁷ Cal Advocates RO Model file "All_Ch03_REV_RO_Sales-Customers," tab "Projected Sales WS-04," column AA.

Figure 1-3: Cal Am Historical Total Water Production



Total water production represents the sum of water sales and non-revenue water. For TY 2027, Cal Advocates recommends a total water production estimate of 37,164,028 CCF, compared to Cal Am's estimate of 36,134,336 CCF.¹⁸ Water production was calculated by multiplying the number of customers by the average water sales per customer. The differences between the recommended and Cal Am's proposed number of customers and water sales per customer result in an increase in water production. The Commission should adopt Cal Advocates' recommended total water production and non-revenue water estimates for TY 2027 (based on recommended number of customers, water sales per customer, and non-revenue water ratios) as shown in Tables 1-8 through 1-13.

¹⁸ Cal Am RO Model file “All_CH03_REV_RO_Water Production,” tab: “Rec Proj Wtr Prod WS-05.”

Table 1-2: Central Division Water Production in Ccf

District	Cal Adv Recommended	Cal Am Estimated	Cal Adv > Cal Am
Monterey Main	3,802,620	3,805,673	(3,053)
Central Satellites	148,348	144,933	3,415
Monterey Chualar	50,265	50,269	(4)
West San Martin	116,650	116,650	0
Corral de Tierra	6,165	6,165	0

Table 1-3: Northern Division Water Production in Ccf

District	Cal Adv Recommended	Cal Am Estimated	Cal Adv > Cal Am
Sacramento	14,102,107	13,499,594	602,513
Larkfield	366,478	352,766	13,712
Meadowbrook	360,503	360,552	(49)
Bass Lake	127,751	127,751	0

Table 1-4: Southern Division Water Production in Ccf

District	Cal Adv Recommended	Cal Am Estimated	Cal Adv > Cal Am
Baldwin Hills	1,120,812	1,094,991	25,821
Bellflower	266,883	244,644	22,239
Duarte	2,316,092	2,287,954	28,138
East Pasadena	664,336	663,149	1,187
San Diego	4,290,507	4,173,699	116,808
San Marino	3,790,587	3,682,217	108,370
Ventura	5,234,971	5,171,298	63,673
Piru/Warring	287,036	240,114	46,922
Yerba Buena	111,918	111,918	0

1 *Non-Revenue Water*

2 Non-revenue water is the difference between water produced by the utility
 3 and water recorded for sales/billed to customers.¹⁹ Cal Am forecasted the non-

¹⁹ American Water Works Association (AWWA), <https://www.awwa.org/elearning/controlling-non-revenue-water-certificate-program/>, accessed on October 15, 2025.

1 revenue amounts for TY 2027 by using a five-year average of recorded years
2 (2020-2024).²⁰ The differences in non-revenue water ratios for Cal Am's districts
3 result from differences in total water production for TY 2027.

Table 1-5: Central Division Non-Revenue Water Percentages

District	Cal Adv Recommended	Cal Am Estimated	Cal Adv > Cal Am
Monterey Main	6.29%	6.29%	0.01%
Central Satellites	15.28%	15.00%	0.28%
Monterey Chualar	27.75%	27.74%	0.00%
West San Martin	11.44%	11.44%	0.00%
Corral de Tierra	100.00%	100.00%	0.00%

Table 1-6: Northern Division Non-Revenue Water Percentages

District	Cal Adv Recommended	Cal Am Estimated	Cal Adv > Cal Am
Sacramento	11.20%	11.70%	-0.50%
Larkfield	11.22%	11.66%	-0.44%
Fruitridge	0.00%	0.00%	0.00%
Bass Lake	20.00%	20.00%	0.00%

²⁰ Cal Am RO Model file “All_CH03_REV_RO_Water Production,” tab: “Projected Wtr Prod WS-04.”

Table 1-7: Southern Division Non-Revenue Water Percentages

District	Cal Adv Recommended	Cal Am Estimated	Cal Adv > Cal Am
Baldwin Hills	11.33%	11.59%	-0.27%
Bellflower	1.06%	1.06%	0.00%
Duarte	19.75%	20.00%	-0.24%
East Pasadena	9.35%	9.36%	-0.02%
San Diego	7.24%	7.44%	-0.20%
San Marino	10.95%	11.27%	-0.32%
Ventura	7.54%	7.64%	-0.09%
Piru/Warring	13.86%	13.86%	0.00%
Yerba Buena	70.48%	70.48%	0.00%

1 **D. Other Revenues**

2 The Commission should adopt ‘other revenues’ amount of \$1,074,358 for
 3 TY 2027.²¹ Other revenue sources include, but are not limited to, Method 5
 4 Revenues,²² Contract Revenues, Antenna Leases, Miscellaneous Revenue, and
 5 Rents.

6 Other revenues should be estimated using best available data.²³ In general,
 7 a five-year average of recorded revenues utilizes the best available data, unless
 8 there is a compelling reason to utilize a different method.

9 In forecasting other revenue, the Rate Case Plan states, “Estimate other
 10 revenues using the best available data.”²⁴ In general, a five-year average of
 11 Method 5 revenue is forecast based on the application of the tariffed gross-up

²¹ Cal Am RO Model file “All_CH03_REV_RO_Revenues,” tab: “SD_Revenues Othr Forst;” Cal Am forecasts other revenues of \$1,049,283 for Test Year 2027 found in the “SD_Revenues Othr Forst” tab of RO Model file “All_CH03_REV_RO_Revenues.”

²² D.87-09-026 requires Class A water utilities to use what is known as Method 5 to account for the applicable tax on contributions and advances. Under Method 5, the developer pays a gross-up related to the net over-time net present value cost difference between tax depreciation benefits and revenue requirements.

²³ Rate Case Plan, Appendix A, at A-23.

²⁴ Rate Case Plan, Appendix A, at A-23.

1 factor applied to the forecasted applicable contributions and advances. The
2 Commission should adopt Cal Advocates' projected Method 5 revenues.²⁵

3 Cal Am stated that antenna leases are forecasted based on the five-year
4 average of the 30% customer revenue share allocation for NTP&S "passive"
5 designation from 2020 through 2024. The costs associated with the intermittent
6 use of Cal Am employees and Cal Am facilities are based on anticipated use and
7 billed to the company. Cal Am also includes forecasted customer allocation of
8 NTP&S revenue sharing related to the associated rental income from two tenants
9 with leases at the new Central Division customer service and administrative
10 offices. All other items are forecasted based on the three-year average (2022 -
11 2024), as it excludes the years when Cal Am did not charge late fees and was
12 under a disconnection moratorium in 2020 and 2021.²⁶

13 For other revenues in the Sacramento service area, Cal Advocates includes
14 \$20,457.92 for the test years, which is provided by Cal Am in response to data
15 request HMC-02 but missing in the RO Model.²⁷ ²⁸ Therefore, the Commission
16 should adopt Cal Advocates' recommended estimates, based on "flow through"
17 differences and the correction to the Sacramento service area, for other revenue for
18 TY 2027.

19 **IV. CONCLUSION**

20 Based on Cal Advocates' review and analysis, for TY 2027, the Commission
21 should adopt a projected total customer average of 200,504 based on the current

²⁵ Cal Am RO Model file "All_Ch03_REV_RO_Revenues," tab: "Rec-Proj Revenues All WS-08."

²⁶ *Application of California-American Water Company (U210W) to Increase Revenues in Each of its Districts Statewide*, Direct Testimony of Lakhjit S. Thind at 10, Line 6-22.

²⁷ Attachment 1-2: Cal Am Response to Cal Advocates' TY 2027 Data Request HMC-02, Question 8, Attachment 1 CONFIDENTIAL," tab "Sacramento Misc Revenues," cell "K20."

²⁸ Cal Am RO Model file "All_Ch03_REV_RO_Revenues," tab: "SD_Revenues Othr Forcst," cells: "J45" through "R45."

1 customers trends, a total water production of 37,164,028 CCF based on the recommended
2 water sales, and adopt an Other Revenues amount of \$1,074,358 based on the adjustment
3 to the Sacramento district and “flow through” differences.

CHAPTER 2 Rate Design

I. INTRODUCTION

A well-designed rate structure recovers authorized revenues, aligns the costs of operating a water system equitably across the system's users, and achieves state policy, including the affordability and equity of water rates for all customers, especially lower and middle-income residents who are enrolled in the Customer Assistance Program (CAP).

However, Cal Am's rate design structures since the last GRC have resulted in over \$9 million in under collection companywide, demonstrating that these structures are poorly designed.²⁹ Under collections result in surcharges which increase customer bills and reduce transparency into customer rates and bill impacts.

In this proceeding, Cal Am proposes two rate design scenarios.³⁰ First, Cal Am's proposed design in the application's Results of Operation Model is based on the Fixed Cost Recovery Account (FCRA), a revenue decoupling mechanism.³¹ Second, the Conservation Adjustment for Rate Tier (CART), which is Cal Am's current rate design, is contingent on the FCRA not being approved.³²

²⁹ California-American Water Company Advice Letter (AL) 1472; AL 1473; AL 1474, which were filed to amortize the 2024 Conservation Adjustment for Rate Tier Designs Mechanism (“CART”) Balancing Account.

³⁰ *Application of California-American Water Company (U210W) to Increase Revenues in Each of its Districts Statewide*, July 1, 2025 (Application) at 15.

³¹ Cal Am is essentially requesting their previous Water Revenue Adjustment Mechanism (WRAM)/Modified Cost Balancing Account (MCBA).

³² Cal Am's rate design based on Cal Am's Monterey-Style Water Revenue Adjustment Mechanisms.

1 **II. SUMMARY OF RECOMMENDATIONS**

2 To implement tiered rate designs that are more equitable, provide needed relief to
3 residential customers, maintain intended conservation signals and rate neutrality, the
4 Commission should:

- 5 • Allow Cal Am's CART based ratios of recovering the revenue requirement
6 from meter charges and quantity charges.
- 7 • Direct Cal Am to have their meter service charge ratios match the meter
8 service charge ratios from Standard Practice U-7-W for all service areas and
9 adopt the meter charge amounts recommended in Attachment 2-1;
- 10 • Adopt the monthly tier breakpoints for residential customers recommended in
11 Attachment 2-4;
- 12 • Adopt the standard quantity rate as the Tier 2 residential rate;
- 13 • Adopt the quantity charge for all other Tiers as detailed in Attachments 2-7, 2-
14 10, and 2-13; and
- 15 • Not authorize Cal Am to increase the CAP discount for the Monterey Main
16 district from 35% to 50% to only the meter service charge and Tier 1 and
17 eliminate the discount for the second and third tier for Monterey customers.

18 **III. ANALYSIS**

19 **A. Revenue Recovery: Meter Charges vs. Quantity Charges**

20 Cal Am proposes to decrease its revenue recovery from meter charges from
21 its present levels under the FCRA proposal by 5% (except for the Central Division
22 where Cal Am would maintain the same levels) and to increase the revenue
23 recovery under the CART proposal by 10%, capped at 50% of Cal Am's revenue

1 recovery from meter charges.³³ The Commission's most recent decision ordered
2 Class A water utilities to shift more water rate collection to fixed charges, with a
3 floor of 40% and up to 50% collected from fixed charges.³⁴ These proposals
4 equate to Cal Am collecting its revenue requirements through the percentage mix
5 of meter charges and quantity charges as shown in the table below. Since Cal
6 Advocates recommends that CART continue to be used by Cal Am and following
7 the most recent guidance,³⁵ the Commission should adopt Cal Am's CART meter
8 charge and quantity charge mix shown in the table.³⁶

Table 2-1: Revenue Recovery Charges³⁷

Division/ Service Area	Present		FCRA		CART	
	Meter Revenue	Quantity Revenue	Meter Revenue	Quantity Revenue	Meter Revenue	Quantity Revenue
Sacramento	45%	55%	40%	60%	50%	50%
Larkfield	40%	60%	35%	65%	50%	50%
Meadowbrook	50%	50%	45%	55%	50%	50%
Monterey Main	48%	52%	48%	52%	50%	50%
Central Satellites	35%	65%	35%	65%	45%	55%
Southern	30%	70%	25%	75%	40%	60%
Southern Acq.	36%	64%	31%	69%	45%	55%

9 **B. Meter Service Charge**

10 The Commission's Standard Practice (SP) U-7-W for water utility rate
11 design reflects industry standards pertaining to the setting of fixed rates for

³³ *Application of California-American Water Company (U210W) to Increase Revenues in Each of its Districts Statewide*, Direct Testimony of Bahman Pourtaherian at 4, Lines 14-19.

³⁴ D.16-12-026 at 8.

³⁵ D.16-12-026 at 88.

³⁶ Testimony of Sam Lam, Cal Advocates' Report on Labor & Benefits, Total Compensations, Special Requests No. 1 and 7. The analysis and testimony of Cal Advocates' witness Sam Lam addresses the CART.

³⁷ Cal Am RO Model file "All_CH10_RD_RO," tab: "Cost of Service WS-02."

1 different sized water service connections.³⁸ Although the actual rates charged by a
2 water utility may vary based on the cost of service, the ratio of any given meter
3 charge to the smallest meter charge is defined by engineering calculations and
4 does not vary per industry standards. As meter size increases, the proportional
5 increase in charges recognizes the increased capabilities (and potential demands
6 and therefore costs) of the service.

7 The following Tables compare Cal Am's proposed meter charge ratios to
8 industry standards, including those found in Commission Standard Practice U-7-
9 W.

Table 2-2: Residential Meter Service Charge Ratios (except for the Monterey Main District)

Meter Size / Service Connection	Cal Am Current and Requested	Industry Standard & CPUC SP U-7
5/8"	1	1
0.75"	1.5	1.5
1"	2.5	2.5
1.5"	5	5
2"	8	8
3"	15	15
4"	25	25
6"	50	50
8"	80	80
10"	115	115

Table 2-3: Residential Meter Service Charge Ratios for the Monterey Main District

Meter Size / Service Connection	Cal Am Current	Industry Standard & CPUC SP U-7
5/8"	1	1
0.75"	1.6	1.5

³⁸ Standard Practice U-7-W, para.7, available at:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M039/K602/39602230.PDF>

1"	2.8	2.5
1.5"	6.5	5
2"	10.7	8
3"	20.0	15
4"	34.1	25
6"	70.4	50
8"	112.7	80
10"	115	115

Table 2-4: Non-Residential Meter Service Charge Ratios

Meter Size / Service Connection	Cal Am Current	Industry Standard & CPUC SP U-7
5/8"	1.5	1
0.75"	2.3	1.5
1"	3.8	2.5
1.5"	7.5	5
2"	12.0	8
3"	22.5	15
4"	37.5	25
6"	75.0	50
8"	120.0	80
10"	172.5	115

Figure 2-1: AWWA Meter Ratios

Meter Capacity & Factors Based on Industry Standards	Meter Size	Meter Capacity (gpm)*	Factor based on 5/8" Meter
	5/8 inch	20	(20/20) = 1.0
	3/4 inch	30	(30/20) = 1.50
	1 inch	50	(50/20) = 2.50
	1-1/2 inch	100	(100/20) = 5.0
	2 inch	160	(160/20) = 8.0
	3 inch	300	(300/20) = 15.0
	4 inch	500	(500/20) = 25.0
	6 inch	1,000	(1000/20) = 50.0
	8 inch	1,600	(1600/20) = 80.0
	10 inch	2,300	(2300/20) = 115.0

*AWWA Manual M6 and Manual M1; WEF Manual of Practice 27. Maximum safe operating capacity. Values depend on type of meter.

1

2 Cal Am's proposed meter service charge ratios for Monterey Main District
3 residential customers and for all Cal Am non-residential customers deviate from

1 the Commission's Standard Practice U-7-W guidance for meter ratios and from
2 industry standard meter charge ratios.

3 The Commission authorized Cal Am to alter the standard meter ratios for
4 residential customers in the Monterey Main District.³⁹ The Commission modified
5 the meter ratios to help mitigate the rate impacts that would result from the
6 multiple changes authorized in the decision. The modification to standard
7 residential meter ratios for recovery of the increased percentage of fixed costs in
8 the residential monthly service charge (Cal Am residential customer class went
9 from 15% to 30% fixed cost recovery) was intended to be temporary.^{40, 41, 42} The
10 Monterey Main District currently has a 48% revenue requirement recovery
11 through meter charges and Cal Am requests an increase to 50% (2% more than the
12 current amount) based on its CART.⁴³ It is evident that after almost 10 years and
13 several GRCs since the 2016 decision, the rate impacts from that decision have
14 been normalized.

15 The Commission approved Cal Am's proposal to close the gap by 50%
16 between the ratios that were in place and used to develop the meters rates and

³⁹ D.16-12-003 at 104.

⁴⁰ D.16-12-003 at 44, “*Applicant proposes to implement the 30 percent fixed cost recovery in the service charge but with a non-permanent modification to the standard residential meter charge ratios cited in Commission Standard Practice U-7-W.*”

⁴¹ D.16-12-003 at 45, “*The deviation from the standard practice adopted here is **temporary** (emphasis added). Rate impact and equity considerations convince us to adopt applicant's temporary deviation.*” “*We accept applicant's proposed **non-permanent** (emphasis added) modest deviation in the standard practice because doing so will help mitigate the rate impacts that result from the multiple changes we authorize in this decision. This deviation in the meter ratios provides some relief and is temporary.*” “*We adopt the **temporary** (emphasis added) deviation here to mitigate rate impacts. In future proceedings we expect applicant and parties to propose the use of standard meter ratios as soon as the disproportionate rate impact is moderated.*”

⁴² D.16-12-003 at 104, Ordering Paragraph (OP) 3, “*... (c) use the **temporary** (emphasis added) modification to standard residential meter ratios recommended by Cal-Am for recovery of the increased percentage of fixed costs in the residential monthly service charge, ...*” (Emphasis Added).

⁴³ Direct Testimony of Bahman Pourtaherian, Attachment 1 at 4.

1 standard residential meter ratios.⁴⁴ The Commission also approved Cal Am's
2 proposal to close the gap by 50% of the remaining 50% gap.⁴⁵ In the previous
3 GRC,⁴⁶ Cal Am suggested that it would consider whether to remove the remaining
4 25% gap in the subsequent GRC (which is the current GRC).⁴⁷

5 The rate impacts from the 2016 decision have been normalized.⁴⁸
6 Therefore, the justification for the meter charge deviation no longer exists. The
7 meter charge ratios should be lowered to industry standards (the remaining 25%
8 gap). Thus, Cal Advocates recommends lowering the meter charges for the
9 Monterey Main District customers. Table 2-5 provides a comparison of standard
10 and historical meter service charge ratios with Cal Am's proposed ratios for TY
11 2024.

Table 2-5: Monterey Main District Historical Residential Meter Service Charge Ratios

Meter Size / Service Connection	Industry Standard & CPUC SP U-7	D.16-12-003 Ratio	D.21-11-018 Ratio	D.24-12-025 and Current Ratio
5/8"	1	1	1	1
0.75"	1.5	1.8	1.63	1.57
1"	2.5	3.5	3	2.75
1.5"	5	11	7.99	6.50
2"	8	18.7	13.36	10.68
3"	15	35.1	25.05	20.03
4"	25	61.4	43.22	34.11

⁴⁴ D.21-11-018 at 17.

⁴⁵ D.24-12-025, *Settlement Agreement Between California-American Water.*

Company and Public Advocates Office, Appendix B, page 1, at 365 of PDF.

⁴⁶ A.22-07-001.

⁴⁷ A.22-07-001, *Application of California-American Water Company (U210w) to Increase Revenues in Each of its Districts Statewide*, Direct Testimony of Bahman Pourtaherian at 44-45.

⁴⁸ D.16-12-003

6"	50	131.6	90.82	70.41
8"	80	210.6	145.31	112.66
10"	115	115	115	115

1 The Commission authorized Cal Am to set monthly meter-based service
 2 fees in all systems 50% higher for non-residential customers than for residential
 3 customers.⁴⁹ Cal Am stated that the purpose of this change was to offset the
 4 impact of recovering more of the overall revenue requirement for fixed monthly
 5 fees.^{50, 51} This adjustment in monthly meter-based service fees results in an
 6 increase in revenue to be recovered from meter charges for non-residential
 7 customers. It is not necessary to continue this change in the meter charge ratios
 8 for non-residential customers to compensate for the change in revenue recovery.
 9 The rate design described in the subsequent section accomplishes this without
 10 departing from industry standards. Additionally, SP U-7-W explicitly indicates
 11 that the industry standard meter ratios should be used by all classes of service.⁵²
 12 As previously shown, Table 2-4 compares Cal Am's current and requested meter
 13 service charge ratios with the industry standards adopted in SP U-7-W.

14 Accordingly, Cal Am's non-residential meter charge ratios should conform
 15 to industry standards because Cal Advocates' proposed rate design compensates
 16 for the impact of the change in revenue recovery. The tables in Attachment 2-1
 17 show a comparison of Cal Am's current monthly meter charges, proposed monthly

⁴⁹ D.24-12-025

⁵⁰ A.22-07-001, Direct Testimony of Bahman Pourtaherian at 45.

⁵¹ A.22-07-001, *Application of California-American Water Company (U210w) To Increase Revenues In Each of its Districts Statewide*, Direct Testimony of Jeffrey T. Linam at 17-18.

⁵² See, Standard Practice U-7-W, Section C.11 that references each class of utility fixed charges in section C.11, , available at:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M039/K602/39602230.PDF>

1 meter charges for TY 2024, and Cal Advocates' recommended monthly meter
2 charges for TY 2024.

3 **C. Residential Customer Rate Design**

4 Cal Am has conservation increasing block rate designs for the residential
5 customer class (which encompasses about 90% of all customers) comprised of
6 two, three or four tiers. Cal Am's rate designs utilize a percentage of a standard
7 quantity rate (SQR) (except for the Monterey Main District) and are based on
8 older data from customer bills from the 2024 calendar year to develop base
9 rates.^{53, 54, 55}

10 This report develops revenue neutral rate designs,⁵⁶ including residential
11 tier rates that maintain intended conservation signals, based on the actual water
12 consumption patterns of the last recorded twelve months (July 2024 to June 2025),
13 and considers the 6 ccf's per month that the Commission has established as the
14 necessary quantity for basic service.^{57 58 59 60} Shifting rate designs from four to

⁵³ The SQR is the average rate necessary to collect the estimated volumetric revenue. It is calculated simply as the amount of volumetric revenue to be collected, divided by the total estimated consumption.

⁵⁴ Base rates include the monthly service charge that is assessed for a customer's meter size and quantity rates that are assessed for the volume of water consumed. Base rates are calculated to meet a utility's revenue requirement and should provide the basic information necessary to evaluate the impacts of requests made by a utility in a general rate case on customers' bills.

⁵⁵ Direct Testimony of Bahman Pourtaherian at 9, Lines 14-18; Direct Testimony of David Mitchell, Attachment 2 at 2.

⁵⁶ Revenue neutral rate design is achieved when the utility collects the same amount of revenue with multiple quantity rates as it would collect under a single quantity rate, as indicated in the sales forecast.

⁵⁷ Attachment 2-2: Cal Am Response to Cal Advocates' TY 2027 Data Request HMC-01, Question 1, that contains an analysis of Cal Am's monthly residential usage data provided in excel spreadsheets per district.

⁵⁸ Attachment 2-3: Cal Am Response to Cal Advocates' TY 2027 Data Request HMC-05, Question 1, that contains an analysis of Cal Am's Monterey Multi-Family customer class monthly residential usage data provided in excel spreadsheet by Cal Am.

⁵⁹ It is noteworthy that while total consumption might fluctuate from year to year, the distribution pattern of usage is relatively stable.

⁶⁰ D.20-07-032, Findings of Fact (FoF) 12, that states, "The 600 cubic feet per household per month

1 three tiers (except for the Monterey Main District) is a key aspect of the
2 recommended rate designs. This change aims to balance conservation incentives
3 with fairness, reducing cross-subsidies, and promoting conservation more
4 equitably across customer groups. Making rates more reflective of actual costs for
5 different usage levels reduces subsidies embedded in a four tier rate design. Also,
6 it is important to note that the Commission found that rate design and rate impacts
7 (i.e., FCRA, CART, etc.) are independent of the decoupling mechanism a utility is
8 authorized to implement.⁶¹

Figure 2-2: Example of Three Tier Increasing Block Rate Design

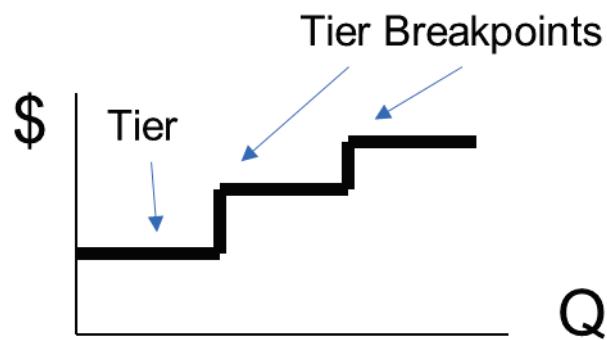


Table 2-6: Sacramento

Tier	Rate Differential			Breakpoint	Percentage Usage		
	Present	FCRA	CART		Present	FCRA	CART
1	82.0%	80.0%	82.8%	10	65.4%	66.6%	65.9%
2	125.0%	125.0%	125.0%	20	22.4%	19.9%	20.1%
3	150.0%	161.9%	145.0%	>20	12.2%	13.5%	14.0%

1 For the Larkfield service area, Cal Am proposes changing the 3rd and 4th
 2 tier rate differentials as well as the percentage of water used per tier.

Table 2-7: Larkfield

Tier	Rate Differential			Breakpoint	Percentage Usage		
	Present	FCRA	CART		Present	FCRA	CART
1	96.0%	96.0%	96.0%	5	45.7%	48.3%	47.2%
2	100.0%	100.0%	100.0%	18	43.4%	39.8%	40.2%
3	115.0%	111.0%	111.0%	25	5.6%	5.5%	5.8%
4	118.6%	120.4%	118.3%	>25	5.3%	6.5%	6.9%

3 For the Meadowbrook service area, Cal Am proposes to change the 1st and
 4 3rd tier rate differentials as well as the tier breakpoints and the percentage of water
 5 used per tier.

Table 2-8: Meadowbrook

Tier	Rate Differential			Breakpoint (CCF)		Percentage Usage		
	Present	FCRA	CART	Present	Proposed	Present	FCRA	CART
1	75.0%	82.0%	82.0%	5	11	26.0%	56.9%	56.9%
2	100.0%	100.0%	110.0%	8	20	15.0%	21.0%	21.0%
3	111.0%	146.5%	136.8%	>8	>20	59.0%	22.0%	22.1%

6 *Bass Lake*

1 Cal Am proposes to increase the present rates for the Bass Lake system by
2 the CPI inflation rate of 2.4%.^{63, 64} Cal Am claims that there is no information
3 available to determine the actual cost of service for Bass Lake, and that it will file
4 a Tier 2 Advice Letter to propose a rate structure for metered service once
5 residential customers begin receiving meters.⁶⁵ The Commission should allow the
6 present rates in the Bass Lake system to increase by 2.4%.

7 The tables in Attachment 2-5 for Cal Am's Northern Division show the
8 results of Cal Am's proposed rate design but use the actual water consumption
9 patterns of the last recorded twelve months (July 2024 to June 2025).⁶⁶

10 The result of Cal Am's proposed rate design is overcollection for
11 Sacramento and Meadowbrook, and under collection for Larkfield. Combining
12 these volumetric revenues with the proposed meter charges, Cal Am's proposed
13 rate design will collect, per CCF, \$0.0216 more for Sacramento, \$0.0207 more for
14 Meadowbrook, and \$0.0047 less for Larkfield than the estimated total revenue
15 requirement allocated to residential customers.

Table 2-9: Northern Division Over/Under Collection (using application amounts)

Service Area	Per Ccf Over/Under Collection
Sacramento	\$0.0216
Larkfield	(\$0.0047)
Meadowbrook	\$0.0207

⁶³ Direct Testimony of Bahman Pourtaherian at 21, Lines 2-3, 14-16.

⁶⁴ Cal Am RO Model file "All_CH10_RD_RO," tab: "BASL_RD," cell: "Q261."

⁶⁵ Direct Testimony of Bahman Pourtaherian at 20, Lines 17-25.

⁶⁶ It is important to note that while total consumption might fluctuate from year to year, the distribution pattern of usage is relatively stable.

1 To achieve revenue neutrality with Cal Am's proposed SQRs for each
2 service area in the Northern Division, the Commission should adopt the
3 parameters shown in Table 2-10 below.

Table 2-10: Cal Advocates Recommended Rate Structure per Tier

Tier	Sacramento	Larkfield	Meadowbrook
Tier 1	75% of SQR	90% of SQR	65% of SQR
Tier 2	SQR	SQR	SQR
Tier 3	169% of SQR (Goal Seek) ⁶⁷	139% of SQR (Goal Seek)	181% of SQR (Goal Seek)

4 The tables in Attachment 2-6 show Cal Advocates' recommended TY 2027
5 rate design using Cal Am's proposed SQR (based on Cal Am's proposed revenue
6 requirement, consumption forecast, and the actual water consumption patterns of
7 the last recorded twelve months. The results confirm revenue neutrality, as the
8 total rate under the recommended rate design equals the SQR.

9 As shown in Table 2-11 below, Cal Advocates' recommended rate design
10 achieves revenue neutrality and results in rate decreases for all Northern Division
11 service areas for TY 2027 compared to the average monthly residential customer
12 bill using the application amounts.

Table 2-11: Northern Division Average Monthly Bill Comparison (using application amounts)

Service Area	Average Monthly Residential Customer Usage	At Cal Adv Recommended Rates	At Cal Am Requested Rates	Cal Adv < Cal Am % Change
Sacramento	8.25 ccf	\$71.35	\$71.73	-0.5%
Larkfield	6.72 ccf	\$68.11	\$69.94	-2.6%
Meadowbrook	11.88 ccf	\$56.20	\$56.73	-0.9%

⁶⁷ The “Goal Seek Function” in Microsoft Excel (often referred to as What-if-Analysis) is a method of solving for a desired output by changing an assumption that drives it. In the case of rate design, this function is used to ensure revenue neutrality by having the SQR as the basis.

*Based on a residential customer with 5/8 x 3/4" meter size.

Excludes applicable surcharges and PUC fees.

1 The tables in Attachment 2-7 show Cal Advocates proposed TY 2027
2 revenue neutral residential rate designs using Cal Advocates' recommended
3 revenue requirement and the actual water consumption patterns of the last
4 recorded twelve months (July 2024 to June 2025).

5 Cal Advocates' proposed revenue neutral rate designs, based on Cal
6 Advocates' recommended revenue requirements, result in the following bill
7 outcomes for Test Year 2027 compared to the average monthly residential
8 customer bill using the application amounts and excluding applicable surcharges
9 and CPUC fees.

Table 2-12: Northern Division Average Monthly Bill Comparison

Service Area	Average Monthly Residential Customer Usage	At Cal Adv Recommended Rates	At Cal Am Requested Rates	Cal Adv < Cal Am % Change
Sacramento	8.25 ccf	\$66.12	\$71.73	-7.8%
Larkfield	6.72 ccf	\$71.03	\$69.94	1.6%
Meadowbrook	11.88 ccf	\$50.87	\$56.73	-10.3%

*Based on a residential customer with 5/8 x 3/4" meter size.

Excludes applicable surcharges and PUC fees.

10 Central Division

11 Under the FCRA and CART proposals, Cal Am requests to maintain the
12 present residential four-tier rate design with changes proposed for the percentage
13 of water used per tier for the Monterey Main District area, as shown below.

Table 2-13: Monterey Main District

Tier	Rate Differential	Breakpoint	Percentage Usage		
			CCF	Present	FCRA
1	150%	4	58.0%	63.5%	63.2%
2	300%	8	24.1%	21.2%	21.3%
3	450%	15	11.6%	8.9%	9.0%
4	625%	>15	6.4%	6.4%	6.5%

1 For the Central Satellites, Cal Am escalates the present rate revenue using
 2 the CPI inflation rate for the proposed revenue requirement and requests
 3 adjustments to the rate differentials and to the percentage of water used per tier, as
 4 shown below.⁶⁸ ⁶⁹

Table 2-14: Central Satellites

Tier	Rate Differential			Breakpoint	Percentage Usage		
	Present	FCRA	CART		CCF	Present	FCRA
1	83.0%	89%	89%	8	53.1%	55.8%	55.2%
2	100.0%	100%	100%	18	23.9%	22.1%	22.2%
3	134.0%	120%	120%	26	18.0%	15.8%	16.1%
4	157.8%	147.5%	144.3%	>26	5.0%	6.3%	6.5%

5 For Chualar and West San Martin, Cal Am is requesting a CPI-based
 6 adjustment (2.4%) to the present rates, without changes to the flat rate design
 7 structure for Chualar and the two-tier rate structure for West San Martin.⁷⁰ ⁷¹ ⁷² ⁷³

⁶⁸ Direct Testimony of Bahman Pourtaherian at 17:23-24.

⁶⁹ Cal Am RO Model file “All_CH10_RD_RO,” tab: “MOS_RD,” cell: “Q261.”

⁷⁰ Direct Testimony of Bahman Pourtaherian at 18:1-2.

⁷¹ Cal Am RO Model file “All_CH10_RD_RO,” tab: “CHLR_RD,” cell “Q261.”

⁷² Direct Testimony of Bahman Pourtaherian at 22:2-4.

⁷³ Cal Am RO Model file “All_CH10_RD_RO,” tab: “WSMA_RD,” cell: “Q261.”

1 Monterey Main District is the only service area that does not use the SQR
2 to set the rates for ratepayers. Cal Am bases rates for the Monterey Main District
3 on a rate (Cal Am refers to this rate as the Conservation Cost Component Base
4 Rate (CCCBR)) constructed from factors that alter the revenue that is supposed to
5 be allocated to the residential customer class. As mentioned previously in the
6 Meter Service Charge section, the Commission implemented revenue allocation
7 deviations for Monterey Main District.⁷⁴ The background of these deviancies
8 stem from the Decision that adopted a water rationing plan for the Monterey Main
9 District.⁷⁵ This plan was a result of a settlement agreement between Cal Am and
10 Cal Advocates and the Monterey Peninsula Water Management District
11 (MPWMD). The settlement came about as a result of the threat of a Cease and
12 Desist Order (that actually was implemented) from the State Water Resources
13 Control Board (SWRCB) that would require Cal Am to decrease its use of Carmel
14 River water beginning in 2009; and the Monterey Superior Court's 2006 ruling
15 that ordered Cal Am to reduce its take from its wells in both the Coastal Subareas
16 and the Laguna Seca Subarea of the Seaside Basin.

17 The parameters from this decision were generally left alone in the
18 subsequent GRCs until the Commission ordered:⁷⁶

19

- 20 • The elimination of the residential rationing allotment system
- 21 • The implementation of the use of the temporary modification to
22 standard residential meter ratios for recovery of the increased
percentage of fixed costs in the residential monthly service charge

⁷⁴ D.16-12-003

⁷⁵ D.09-07-023

⁷⁶ D.16-12-003

1 • To move 8.4% of forecast revenue collection from residential to non-
2 residential customers.⁷⁷

3 Thus, Cal Am bases its customer rates on a rate that encompasses the above
4 changes. As discussed in the Meter Service Charge section, the conditions that
5 justify the temporary modification of standard residential meter ratios no longer
6 apply. The move to allocate 8.4 % of forecast revenue collection from residential
7 to non-residential customers was based on Cal Am using 2014 sales data to
8 forecast 2016 consumption levels for residential customers, but not for non-
9 residential ratepayers. The use of the 2014 sales data factored into the revised rate
10 design and rates for TY 2016 that were previously authorized,⁷⁸ which resulted in
11 disproportionate revenue recovery from residential customers in relation to
12 consumption.⁷⁹ Thus, the Commission decided to order the 8.4% move of forecast
13 revenue to align revenue recovery to promote equity by maintaining
14 proportionality between consumption and cost recovery and based on the
15 multitude of changes adopted in the decision.⁸⁰ The allocation from residential to
16 non-residential in the current GRC is \$11,469,362.⁸¹ There hasn't been a disparity
17 between sales data years to forecast consumption levels for residential customers
18 in the last GRCs nor is there in the current GRC. This situation no longer exists.

⁷⁷ D.16-12-003 at 104.

⁷⁸ D.15-04-007

⁷⁹ D.16-12-003 at 54-55 states, “ORA states that updating the consumption data (e.g., using 2014 sales) to develop rates in this proceeding for residential but not for non-residential customers exacerbates the disparity in cost recovery between those customer classes.” “ORA asserts this results in disproportionate revenue recovery from residential customers in relationship to consumption. (Exhibit 104 (Odell) at 1-8; also see Exhibit 2 (Chew) at 43.) We agree with ORA that an unreasonable inequity results.”

⁸⁰ D.16-12-003 at 55-56, “The result promotes equity by maintaining proportionality between consumption and cost recovery.” “Today’s decision aligns revenue recovery to promote equity based on the evidence in this proceeding and the multitude of changes we adopt here (e.g., collecting WRAM/MCBA balances, ending allotments, increasing fixed cost recovery in the service charge, addressing use of meter ratios, changing block widths, reducing ratio between tiers).”

⁸¹ Cal Am RO Model file “All_CH10_RPT_MOC,” tab: “Monterey County RD.”

1 Monterey Main District's outdated rate design is constructed to
2 automatically under collect revenue and will keep doing so. This is evidenced in
3 Cal Am's amortization request of their Central Division CART 2024 balances that
4 has an \$8,069,639 under collection.⁸² Cal Am even went so far as to file a Petition
5 for Modification to attempt to have the Commission modify the CART to
6 accommodate the Monterey rate design and allow for recovery of the under
7 collection.⁸³ ⁸⁴ Cal Am's petition makes no sense since modifying the CART for
8 Cal Am would result in other Class A water companies requesting self-serving
9 modification to their CART mechanisms. It is the Monterey Rate Design that
10 should be modified, not the CART. As stated previously, the rate impacts from
11 the 2016 Decision have been normalized and the factors that caused the special
12 conditions in the decision no longer exist.

13 Therefore, the meter charge ratios should be lowered to industry standards
14 (as mentioned in the Meter Service Charge section) and the move of 8.4% of
15 forecast revenue collection from residential to non-residential customers should be
16 eliminated. As a result, the following items should be removed from the
17 accounting procedure (item 3) of the CART preliminary statement:⁸⁵

- 18 d. For Monterey, recorded meter charge revenues collected
19 under the conservation rate design metered service rate
20 schedule (debit).
- 21 e. For Monterey, the calculated revenues that would have
22 been collected under the standard meter rate for the same
23 recorded connections as in Item 3d, above (credit).

⁸² AL 1473-A.

⁸³ A.22-07-001, California-American Water Company's Petition for Modification of D.24-12-025, September 19, 2025 (Cal Am September 19, 2025 PFM).

⁸⁴ Cal Am September 19, 2025 PFM at 1-2.

⁸⁵ Preliminary Statement BY. Conservation Adjustment for Rate Tier Designs Mechanism (CART) Balancing Account

Application Parameters

In Cal Am's complicated and cumbersome application workpaper and under the meter charge ratios and revenue allocation deviations, Cal Am established separate CCCBRs for the Single Family Residential and Multi-Family Residential customer classes within the Monterey Main District.⁸⁶ Cal Am then added a single flat surcharge to ratepayers for each unit of water used to recover Pure Water Monterey costs.⁸⁷ The tables in Attachment 2-8 for Cal Am's Central Division show the results of Cal Am's proposed rate design but using the actual water consumption patterns of the last recorded twelve months (July 2024 to June 2025) and the revenue neutral CCCBRs for Monterey Main District's Single Family Residential and Multi-Family Residential customer classes (based on the deviations described previously rate design).

The results of Cal Am’s proposed rate design in the Central Division are an overcollection of approximately 146% more than the necessary volumetric revenue for Monterey Single Family, and an overcollection of approximately 86% and 2% more than necessary volumetric revenue for Monterey Multi-Family and Central Satellites, respectively. Combining these overcollected volumetric revenues with the proposed meter charges, Cal Am’s proposed rate design will collect, per CCF, \$6.7564 more for Monterey Single Family, \$7.4590 more for Monterey Multi-Family and \$0.1797 more for Central Satellites than the estimated total revenue requirement allocated to residential customers, as shown in Table 2-15:

⁸⁶ Cal Am RO Model file “All CH10 RPT MOC,” tab: “Monterey County RD.”

⁸⁷ Direct Testimony of Bahman Pourtaherian at 13, Lines 4-5; Pure Water Monterey is a water recycling project, jointly developed by two public agencies – Monterey Peninsula Water Management District and the Monterey One Water.

Table 2-15: Central Division Over/Under Collection (using application amounts)

Service Area	Per Ccf Over/Under Collection
Monterey Single Fam	\$6.7564
Monterey Multi-Fam	\$7.4590
Central Satellites	\$0.1797

1 The tables in Attachment 2-9 show Cal Advocates' proposed TY 2027 rate
2 design using Cal Am's application revenue neutral CCCBRs and SQR (based on
3 Cal Am's proposed revenue requirement, consumption forecast, etc.) and the
4 actual water consumption patterns of the last recorded twelve months.

5 As shown in Table 2-17 below, Cal Advocates' recommended rate design
6 achieves revenue neutrality and results in rate decreases for the Monterey Single
7 Family customer class, the Monterey Multi-Family customer class and the Central
8 Satellites for TY 2027 compared to the average monthly residential customer bill
9 using the application amounts. The rate decreases for the Monterey Single Family
10 customer class and the Monterey Multi-Family customer class result from the
11 large overcollections generated by Cal Am's proposed rate designs.

Table 2-16: Central Division Average Monthly Bill Comparison (using application amounts)

Service Area	Average Monthly Residential Customer Usage	At Cal Adv Recommended Rates	At Cal Am Requested Rates ⁸⁸	Cal Adv < AVR % Change
Monterey Single Family	4.22 ccf	\$78.61	\$93.62	-16.0%
Monterey Multi-Family	21.12 ccf	\$325.96	\$965.82	-66.3%
Central Satellites	8.92 ccf	\$96.81	\$102.46	-5.5%

*Based on a residential customer with 5/8 x 3/4" meter size.
Excludes applicable surcharges and PUC fees.

⁸⁸ Cal Am RO Model file "All_CH10_RD_RO."

1 Yet, these amounts are not accurate for the Monterey Single Family and
2 Multi-Family customer classes since Cal Am's Monterey rate design is neither
3 allocating nor collecting the correct revenue between residential and non-
4 residential customers because of the deviations to the Monterey Main District
5 discussed previously. Also, the percentage of revenue allocated per customer
6 class does not coincide with the percentage of water used historically by the
7 customer class. Cal Am is requesting to continue the same rate design structure it
8 currently has, thus, the effect of the errors in Cal Am's Monterey rate design can
9 be seen in Cal Am's amortization request of their Central Division CART 2024
10 balances that results in an \$8,069,639 under collection.⁸⁹ The result will impose a
11 surcharge of \$1.7620 per ccf for the Monterey Single Family (SF) and Multi-
12 Family (MF) residential customer classes over a 24 month period. As a result, the
13 average Monterey monthly residential customer bill for TY 2027 with the added
14 surcharge for the under collection would be much higher as reflected below.

Table 2-17: Monterey Residential Average Monthly Bill Comparison (using application amounts)

Class	Average Monthly Residential Usage	Cal Adv Rates	Cal Adv Rates with AL 1473 Surcharge	% Increase	Cal Am Rates	Cal Am Rates with AL 1473 Surcharge	% Increase
SF	4.22 ccf	\$78.61	\$86.04	9.5%	\$93.62	\$101.05	7.9%
MF	21.12 ccf	\$325.96	\$363.18	11.4%	\$965.82	\$1,003.04	3.9%

*Based on a residential customer with 5/8 x 3/4" meter size.
Excludes other applicable surcharges and PUC fees.

15 The current Monterey rate design, which Cal Am proposes to continue,
16 results in unnecessary non-transparent rate increases for ratepayers because they
17 are blindsided by a high surcharge which makes their artificially deflated monthly
18 bill increase by 9.5% for Single Family and 11.4% for Multi-Family customers.

⁸⁹ AL 1473-A.

Replacing Cal Am's Outdated Monterey Rate Design

Allocating the correct revenue per customer class based on historical water usage, correcting the meter charge ratios to industry standards (as mentioned in the Meter Service Charge section), removing the Pure Water Monterey charge from the rate design (since the costs for this program are already contained in the revenue requirement), simplifying the calculations in the Monterey Main District workpapers, and eliminating the move of 8.4% of forecast revenue collection from residential to non-residential customers results in an efficient and fair rate design for ratepayers. Correcting these errors and having the residential and non-residential customer classes recovering their own revenue results in having a true SQR per customer class based on an equitable allocation of revenue and no over or under collection.

Cal Advocates' recommended simplified rate design described in the previous section using the true SQR achieves revenue neutrality and results in rate increases for the Monterey Single Family and Monterey Multi-Family customers for TY 2027 compared to the average monthly residential customer bill using the application amounts. The rate differences for the Monterey Single Family and Monterey Multi-Family customer classes result from not having the large overcollections generated by Cal Am's proposed complicated rate designs.

Table 2-18: Monterey Average Monthly Bill Comparison (using application amounts and true SQR)

Class	Average Monthly Residential Customer Usage	At Cal Adv Recommended Rates	At Cal Am Requested Rates	Cal Adv < Cal Am % Change
Single Family	4.22 ccf	\$107.40	\$93.62	14.7%
Multi-Family	21.12 ccf	\$1,293.30	\$965.82	33.9%

*Based on a residential customer with 5/8 x 3/4" meter size

Excludes applicable surcharges and PUC fees.

1 Using the Cal Advocates' recommended revenue requirement, the true SQR
2 (eliminating Cal Am's Monterey rate design errors), and the actual water
3 consumption patterns of the last recorded twelve months (July 2024 to June 2025),
4 the tables in Attachment 2-10 show Cal Advocates' recommended TY 2027
5 revenue neutral residential rate designs for the Central Division.

6 Cal Advocates' proposed simplified revenue neutral rate designs, based on
7 Cal Advocates' recommended revenue requirements and true SQR, result in the
8 following bill decreases for TY 2027 compared to the average monthly residential
9 customer bill using the application amounts and excluding applicable surcharges
10 and CPUC fees. The recommended Monterey Main District rate design is simpler
11 and more equitable than Cal Am's proposal. Also, Monterey Main District
12 ratepayers will not be stunned by a non-transparent bill hike through a non-
13 revenue neutral (overcollection/under collection) high surcharge as previously
14 described (i.e., CART 2024 amortization).

Table 2-19: Central Division Average Monthly Bill Comparison (using true SQR)

Service Area	Average Monthly Residential Customer Usage	At Cal Adv Recommended Rates	At Cal Am Requested Rates	Cal Adv < Cal Am % Change
Monterey Single Family	4.22 ccf	\$93.52	\$93.62	-0.1%
Monterey Multi-Family	21.12 ccf	\$520.32	\$965.82	-46.1%
Central Satellites	8.92 ccf	\$98.30	\$102.46	-4.1%

*Based on a residential customer with 5/8 x 3/4" meter size.
Excludes applicable surcharges and PUC fees.

15 ***Central Satellites, Chualar, and West San Martin***

16 Cal Am is requesting to increase the present rate revenues for the Central
17 Satellites, Chualar, and West San Martin districts by the inflation rate of 2.4% to
18 calculate the requested revenue requirement. The calculated requested revenue

1 was set by Cal Am as the revenue requirement for the rate design model to
2 determine their requested rates.

3 The revenue requirement for the Central Satellites and Chualar districts has
4 historically been calculated by applying the lower of the overall Monterey County
5 District revenue requirement increase, or inflation.⁹⁰ The Commission should
6 allow the present rates in the Central Satellites, Chualar, and West San Martin
7 districts to increase by 2.4%.

8 **Southern Division**

9 Cal Am requests to maintain the present residential four tier rate design and
10 breakpoints with changes proposed for the rate differentials and the percentage of
11 water used per tier for the Southern service area (Los Angeles County (Baldwin
12 Hills, Duarte, San Marino), San Diego and Ventura) as shown below.

Table 2-20: Southern

Tier	Rate Differential			Breakpoint	Percentage Usage		
	Present	FCRA	CART		Present	FCRA	CART
1	80.0%	85.0%	92.0%	11	59.9%	65.9%	64.9%
2	115.0%	105.0%	105.0%	18	16.4%	13.9%	13.9%
3	132.0%	125.0%	115.0%	40	17.6%	13.1%	13.5%
4	148.3%	183.5%	132.2%	>40	6.1%	7.1%	7.6%

13 Cal Am proposes to consolidate three recently acquired systems,
14 Bellflower, Piru, and East Pasadena, into a new Southern Division Acquisition
15 Transition group. The rate design for these consolidated systems is the following.

⁹⁰ Direct Testimony of Bahman Pourtaherian at 47.

Table 2-21: Southern Acquisition Transition

Tier	Rate Differential		Breakpoint	Percentage Usage	
	FCRA	CART	CCF	FCRA	CART
1	94.0%	94.0%	11	68.4%	67.6%
2	100.0%	105.0%	18	14.0%	14.2%
3	110.0%	115.0%	40	11.6%	12.0%
4	149.4%	124.7%	>40	6.0%	6.3%

1 The present rate designs for the three acquired systems are below.

Table 2-22: Bellflower

Tier	Rate Differential	Breakpoint CCF	Percentage Usage
	Present	Present	Present
1	95.0%	11	65.4%
2	100.0%	18	17.6%
3	119.0%	>18	17.0%

Table 2-23: Piru/Warring

Tier	Rate Differential	Breakpoint CCF	Percentage Usage
	Present	Present	Present
1	95.0%	40	93.9%
2	177.0%	>40	6.1%

Table 2-24: East Pasadena

Tier	Rate Differential	Breakpoint CCF	Percentage Usage
	Present	Present	Present
1	90.0%	18	66.2%
2	115.0%	40	22.6%
3	129.0%	>40	11.2%

2 For the Yerba Buena service area, Cal Am proposes to increase the present
 3 rates by the CPI inflation rate of 2.4% and convert the rate design from flat rate to

1 a two tiered rate design.⁹¹ ⁹² Cal Am claims that this treatment is due to the
2 absence of detailed usage distribution data.⁹³ The Commission should allow the
3 present rates in the Yerba Buena system to increase by 2.4% and for the two tiered
4 rate design.

5 Cal Am includes the purchased water retained in the Baldwin Hills, San
6 Diego and Ventura districts (which are part of the Southern district) in these
7 district's SQR development.⁹⁴ The tables in Attachment 2-11 for Cal Am's
8 Southern Division show the results of Cal Am's proposed rate design but using the
9 actual water consumption patterns of the last recorded twelve months (July 2024
10 to June 2025).

11 The results of Cal Am's proposed rate design are overcollections for the
12 service areas in the Southern Division. Combining the overcollected volumetric
13 revenues with the proposed meter charges, Cal Am's proposed rate design will
14 differ from the estimated total revenue requirement allocated to residential
15 customers by the per-CCF amounts shown in the following table:

Table 2-25: Southern Division Over/Under Collection (using application amounts)

Service Area	Per Ccf Over/Under Collection
Los Angeles County	\$0.0507
San Diego	\$0.0791
Ventura	\$0.0627
Southern Acquisition	\$0.0158

⁹¹ Direct Testimony of Bahman Pourtaherian at 22, Lines 22-27.

⁹² Cal Am RO Model file "All_CH10_RD_RO," tab "YRBA_RD," cell "Q261."

⁹³ Direct Testimony of Bahman Pourtaherian at 22, Line 27, and at 23 Lines 1-2.

⁹⁴ Cal Am RO Model file "All_CH10_RD_RO," tab: "Rate Design WS-04."

1 To achieve revenue neutrality with Cal Am's proposed SQRs for each
2 service area in the Southern Division, the Commission should adopt the rate
3 structure parameters as shown in the following table:

Table 2-26: Cal Advocates Recommended Rate Structure per Tier

Tier	Los Angeles (Baldwin Hills, Duarte, San Marino), San Diego, Ventura	Southern Acquisition Transition
Tier 1	75% of SQR	75% of SQR
Tier 2	SQR	SQR
Tier 3	158% of SQR (Goal Seek)	177% of SQR (Goal Seek)

4 The tables in Attachment 2-12 show Cal Advocates' TY 2027 proposed
5 rate designs using Cal Am's proposed SQR (based on Cal Am's proposed revenue
6 requirement, consumption forecast, etc.) and the actual water consumption
7 patterns of the last recorded twelve months. The results confirm revenue
8 neutrality since the total rate of the recommended rate designs equals the SQR.

9 As shown in the table below, Cal Advocates' recommended rate design
10 achieves revenue neutrality and results in rate decreases for all the Southern
11 Divisions service areas for TY 2027 compared to the average monthly residential
12 customer bill using the application.

Table 2-27: Southern Division Average Monthly Bill Comparison (using application amounts)

Service Area	Average Monthly Residential Customer Usage	At Cal Adv Recommended Rates	At Cal Am Requested Rates	Cal Adv < Cal Am % Change
Baldwin Hills	10.42 ccf	\$89.63	\$93.34	-4.0%
Duarte	11.79 ccf	\$97.26	\$100.94	-3.6%
San Diego	7.40 ccf	\$91.21	\$99.13	-8.0%
San Marino	14.40 ccf	\$111.80	\$116.21	-3.8%
Ventura	12.15 ccf	\$113.28	\$117.96	-4.0%
Bellflower	10.45 ccf	\$58.31	\$64.82	-10.0%
East Pasadena	11.83 ccf	\$63.04	\$73.05	-13.7%
Piru/Warring	12 ccf	\$63.65	\$74.40	-14.5%
*Based on a residential customer with 5/8 x 3/4" meter size. Excludes applicable surcharges and PUC fees.				

1 Using Cal Advocates' recommended revenue requirement and the actual
 2 water consumption patterns of the last recorded twelve months (July 2024 to June
 3 2025), the tables in Attachment 2-13 show Cal Advocates' proposed TY 2027
 4 revenue neutral residential rate design.

5 Cal Advocates' recommended revenue neutral rate designs, based on Cal
 6 Advocates' recommended revenue requirements, results in the following bill
 7 decreases for Test Year 2027 compared to the average monthly residential
 8 customer bill using the application amounts and excluding applicable surcharges
 9 and CPUC fees.

Table 2-28: Southern Division Average Monthly Bill Comparison

Service Area	Average Monthly Residential Customer Usage	At Cal Adv Recommended Rates	At Cal Am Requested Rates	Cal Adv < Cal Am % Change
Baldwin Hills	10.42 ccf	\$84.37	\$93.34	-9.6%
Duarte	11.79 ccf	\$91.03	\$100.94	-9.8%
San Diego	7.40 ccf	\$88.10	\$99.13	-11.1%
San Marino	14.40 ccf	\$103.72	\$116.21	-10.8%
Ventura	12.15 ccf	\$106.80	\$117.96	-9.5%
Bellflower	10.45 ccf	\$58.43	\$64.82	-9.9%
East Pasadena	11.83 ccf	\$63.17	\$73.05	-13.5%
Piru/Warring	12 ccf	\$63.78	\$74.40	-14.3%

*Based on a residential customer with 5/8 x 3/4" meter size.
Excludes applicable surcharges and PUC fees.

1 Cal Advocates' recommended tiered residential rate designs are more
2 equitable, provide needed relief to residential customers, maintain intended
3 conservation signals and rate neutrality as opposed to Cal Am's proposed rate
4 designs.

5 **D. Non-Residential Customer Rate Design**

6 The recommended non-residential customer rate design reflects the
7 implementation of the standard industry meter service charge ratios, and, for the
8 Central Division, the updated recommended Monterey Main residential customer
9 rate design as described earlier in this chapter. For Monterey Main, a revenue
10 neutral SQR was established for the development of the rates.

1 **E. Customer Assistance Program**

2 Cal Am’s Customer Assistance Program (“CAP”) had 24,972 participants
3 as of June 2025.⁹⁵ For qualifying customers, the CAP provides a 25% per month
4 discount on meter charges and Tier 1 and 2 volumetric charges in all service areas
5 except for the Monterey Main District.⁹⁶ For Monterey, the discount is 35% and
6 applies to rate tiers 1 through 3 to account for Monterey’s outdated rate design.⁹⁷

7 CAP is currently funded by a \$3.15 per month surcharge applicable to all
8 non-CAP customers.⁹⁸ Cal Am proposes increasing the discount for the Monterey
9 Main District from 35% to 50% for only the meter service charge and Tier 1, thus
10 eliminating the discount for the second and third tier for Monterey customers.⁹⁹ ¹⁰⁰
11 Cal Am does not propose CAP changes to any other service area.¹⁰¹ Cal Am
12 justifies its proposal stating that this change is necessary to further align
13 affordability ratios of the Monterey service areas to its non-Monterey service
14 areas.¹⁰²

15 As described in the previous sections of this chapter, the recommended rate
16 design for the Monterey Main District corrects Cal Am’s outdated rate design
17 (including the unaligned and non-industry standard meter ratios) and prevents a
18 bill hike shock to ratepayers. Thus, there is no need to alter Monterey Main
19 District’s CAP discount and, consequently, the CAP surcharge for all non-CAP

⁹⁵ Attachment 2-2: Cal Am Response to Cal Advocates’ TY 2027 Data Request HMC-01, Question 8 a-b Attachment 1 - CAP 2022-2025.

⁹⁶ *Application of California-American Water Company (U210W) to Increase Revenues in Each of its Districts Statewide*, Direct Testimony of Patrick Pilz at 12, Lines 12-13.

⁹⁷ Direct Testimony of Patrick Pilz at 12, Lines 13-15.

⁹⁸ Attachment 2-2: Cal Am Response to Cal Advocates’ TY 2027 Data Request HMC-01, Question 8c.

⁹⁹ Direct Testimony of Patrick Pilz at 14, Lines 1-3.

¹⁰⁰ Direct Testimony of Patrick Pilz at 15, Line 8.

¹⁰¹ Direct Testimony of Patrick Pilz at 15, Lines 19-20.

¹⁰² Direct Testimony of Patrick Pilz at 14, Lines 13-16.

1 Cal Am customers. These recommendations are consistent with the Commission's
2 Environmental and Social Justice Action Plan (ESJ Plan) to strive to improve
3 access to high-quality water for ESJ communities.¹⁰³ Specifically, Cal Advocates'
4 recommendations are consistent with goal number three in the ESJ Action Plan,
5 that includes the goal to "Strive to improve access to high-quality water."¹⁰⁴ Cal
6 Advocates' proposed rate design supports this goal.

Table 2-29: Cal Am CAP Surcharge History^{105 106}

Year	CAP Surcharge	% Increase
2015	\$1.54	
2016	\$1.86	21%
2017	\$1.21	-35%
2018	\$1.21	0%
2019	\$1.81	50%
2020	\$1.81	0%
2021	\$1.81	0%
2022	\$1.30	-28%
2023	\$1.59	22%
2024	\$1.77	11%
2025	\$3.15	78%
Average Increase		12%

¹⁰³ Environmental and Social Justice Action Plan, California Public Utilities Commission, available at: <https://www.cpuc.ca.gov/ESJactionplan/>

¹⁰⁴ Environmental and Social Justice Action Plan, California Public Utilities Commission, ESJ Action Plan Goals, available at: <https://www.cpuc.ca.gov/ESJactionplan/>

¹⁰⁵ Attachment 2-2: Cal Am Response to Cal Advocates' TY 2027 Data Request A.25-07-003, Cal Am Response to Public Advocates Data Request HMC-001, Question 5, that contains an analysis of Cal Am's average monthly bill for residential customers by district provided in excel spreadsheets per district.

¹⁰⁶ Attachment 2-14: Cal Am Response to Cal Advocates' TY 2024 Data Request HMC-01, Question 4, contains an analysis of Cal Am's average monthly bill for residential customers by district provided in excel spreadsheets per district.

1 **F. Bill Analysis**

2 Comparing the differences between bill amounts from base rates to bills
3 that include surcharges and fees is vital to understand the impact that surcharges
4 have. Ratepayers are frequently shocked by higher than anticipated bills because
5 of the addition of surcharges. During the period of 2015 through this 2025 GRC
6 application, the average difference between Cal Am's average residential customer
7 bills from base rates and average residential customer bills that include surcharges
8 and CPUC fees is 56% for all service areas.^{107 108 109} Thus, Cal Am's residential
9 customers had a 56% increase in their bills from surcharges and CPUC fees.

10 We can look at the Monterey Main District to illustrate how harmful
11 surcharges have been for the average customer. In 2021, the average residential
12 customer in the Monterey Main District had a bill of \$59.03 based on base rates
13 and average usage. But adding the surcharges and CPUC fee resulted in an
14 average bill of \$103.18 or 75% higher than the bill without surcharges for the
15 average customer.

Table 2-30: Monterey Main 2021 Monthly Average Residential Bill – Base Rates

5/8 x 3/4" Meter Service Charge	Tier 1 (CCF)		Tier 2 (CCF)		Tier 3 (CCF)		Tier 4 (CCF)		Tier 5 (CCF)		Avg Usage per Month (CCF)	Base Rate Charges
	Tier 1 Max	Per	Tier 2 Max	Per	Tier 3 Max	Per	Tier 4 Max	Per	Tier 5 Max	Per		
\$21.48	4.0	\$6.69	4.0	\$10.03	6.0	\$23.41	9.0	\$43.48	N/A	\$53.51	5.1	\$59.03

¹⁰⁷ Attachment 2-2: Cal Am Response to Cal Advocates' TY 2027 Data Request A.25-07-003, Cal Am Response to Public Advocates Data Request HMC-001, Question 5, contains an analysis of Cal Am's average monthly bill for residential customers by district provided in excel spreadsheets per district.

¹⁰⁸ Attachment 2-14: Cal Am Response to Cal Advocates' TY 2024 Data Request HMC-01, Question 4, contains an analysis of Cal Am's average monthly bill for residential customers by district provided in excel spreadsheets per district.

¹⁰⁹ AL 1459.

Table 2-31: Monterey Main 2021 Monthly Average Residential Bill – Base Rates with Surcharges and CPUC Fee

Base Rate Monthly Charges	Monthly Charges				Base Rate with Surcharges and CPUC Fee Monthly Charges
	Non-CAP (per CCF)	CAP per Acct	Sur-credits per Acct	PUC User Fee	
\$59.03	\$41.23	\$1.81	-\$0.28	\$1.39	\$103.18

Table 2-32: Monterey Main 2021 Monthly Average Residential Bill Increase from Base Rates to Base Rates with Surcharges and CPUC Fee

Year	Average Bill		
	Base Rates	% Increase	With Surcharges and CPUC Fee
2021	\$59.03	75%	\$103.18

1 Cal Am's recent amortization request of its Central Division CART 2024
 2 balance of \$8,069,639 results in a surcharge of \$1.7620 per ccf for the Monterey
 3 Single Family (SF) and Multi-Family (MF) residential customer classes over a 24-
 4 month period, further exacerbating the bill increases in Monterey.¹¹⁰

5 The detrimental effect of surcharges is felt across all Cal Am service areas.
 6 Depending on the district, the average residential customer bill (based on the
 7 average usage of water per month for each year) has increased from 13% to 145%
 8 in the period of 2015 through this 2025 GRC application. The tables below
 9 illustrate the increases per service area.

¹¹⁰ AL 1473-A.

Table 2-33: Sacramento Bill Analysis

	Average Bill			% Increase Avg Bill with Surcharges and CPUC Fee
	Base Rates	% Increase	With Surcharges and CPUC Fee	
2015	\$39.45	8%	\$42.68	
2016	\$41.91	19%	\$49.81	17%
2017	\$45.69	18%	\$53.76	8%
2018	\$46.49	18%	\$54.65	2%
2019	\$44.00	25%	\$54.99	1%
2020	\$48.30	20%	\$57.97	5%
2021	\$47.26	1%	\$47.67	-18%
2022	\$52.77	7%	\$56.70	19%
2023	\$56.21	7%	\$60.11	6%
2024	\$60.42	11%	\$67.07	12%
2025	\$58.44	11%	\$64.96	-3%
Average Change	14%		Total Change	48%

Table 2-34: Larkfield Bill Analysis

Year	Average Bill			% Increase Avg Bill with Surcharges and CPUC Fee
	Base Rates	% Increase	With Surcharges and CPUC Fee	
2015	\$62.89	4%	\$65.14	
2016	\$63.99	26%	\$80.84	24%
2017	\$70.15	28%	\$89.86	11%
2018	\$62.95	29%	\$81.36	-9%
2019	\$72.83	31%	\$95.63	18%
2020	\$79.79	24%	\$98.68	3%
2021	\$72.67	13%	\$82.44	-16%
2022	\$68.65	5%	\$71.87	-13%
2023	\$67.59	8%	\$73.33	2%
2024	\$78.26	10%	\$86.39	18%
2025	\$64.97	9%	\$70.50	-18%
Average Change	18%		Total Change	19%

Table 2-35: Meadowbrook Bill Analysis

Year	Average Bill			% Increase Avg Bill with Surcharges and CPUC Fee
	Base Rates	% Increase	With Surcharges and CPUC Fee	
2019	\$42.42	11%	\$47.22	
2020	\$44.82	12%	\$50.00	6%
2021	\$50.84	8%	\$54.98	10%
2022	\$50.99	14%	\$58.13	6%
2023	\$55.92	11%	\$62.09	7%
2024	\$62.94	5%	\$66.29	7%
2025	\$44.87	15%	\$51.44	-22%
Average Change	11%		Total Change	13%

Table 2-36: Monterey Main District Bill Analysis

Year	Average Bill			% Increase Avg Bill with Surcharges and CPUC Fee
	Base Rates	% Increase	With Surcharges and CPUC Fee	
2015	\$32.94	31%	\$42.99	
2016	\$34.70	26%	\$43.87	2%
2017	\$48.28	57%	\$75.64	72%
2018	\$49.31	53%	\$75.39	0%
2019	\$53.46	53%	\$81.57	8%
2020	\$64.58	63%	\$105.15	29%
2021	\$59.03	75%	\$103.18	-2%
2022	\$71.66	48%	\$106.39	3%
2023	\$71.18	58%	\$112.17	5%
2024	\$79.57	57%	\$124.84	11%
2025	\$91.73	58%	\$144.52	16%
Average Change	55%		Total Change	145%

Table 2-37: Central Satellites Bill Analysis

Year	Average Bill			% Increase Avg Bill with Surcharges and CPUC Fee
	Base Rates	% Increase	With Surcharges and CPUC Fee	
2015	\$53.94	71%	\$92.36	
2016	\$63.00	60%	\$100.57	9%
2017	\$63.09	27%	\$79.94	-21%
2018	\$66.76	23%	\$82.22	3%
2019	\$74.64	55%	\$115.58	41%
2020	\$82.03	50%	\$122.91	6%
2021	\$82.95	49%	\$123.75	1%
2022	\$101.56	28%	\$129.78	5%
2023	\$106.31	26%	\$134.30	3%
2024	\$129.97	23%	\$160.26	19%
2025	\$102.67	11%	\$114.26	-29%
Average Change	35%		Total Change	38%

Table 2-38: San Diego Bill Analysis

Year	Average Bill			% Increase Avg Bill with Surcharges and CPUC Fee
	Base Rates	% Increase	With Surcharges and CPUC Fee	
2015	\$46.89	10%	\$51.72	
2016	\$46.16	20%	\$55.49	7%
2017	\$48.10	28%	\$61.69	11%
2018	\$49.83	35%	\$67.05	9%
2019	\$52.90	22%	\$64.62	-4%
2020	\$56.51	19%	\$67.04	4%
2021	\$56.04	18%	\$65.92	-2%
2022	\$65.45	16%	\$75.82	15%
2023	\$66.89	15%	\$76.99	2%
2024	\$79.15	12%	\$88.29	15%
2025	\$76.79	18%	\$90.58	3%
Average Change	20%		Total Change	59%

Table 2-39: Ventura Bill Analysis

Year	Average Bill			% Increase Avg Bill with Surcharges and CPUC Fee
	Base Rates	% Increase	With Surcharges and CPUC Fee	
2015	\$66.86	12%	\$75.16	
2016	\$63.06	26%	\$79.72	6%
2017	\$69.29	25%	\$86.93	9%
2018	\$75.01	27%	\$95.61	10%
2019	\$69.34	29%	\$89.79	-6%
2020	\$78.86	29%	\$102.01	14%
2021	\$79.45	32%	\$105.12	3%
2022	\$77.80	20%	\$93.42	-11%
2023	\$78.86	20%	\$94.39	1%
2024	\$102.24	14%	\$116.74	24%
2025	\$99.24	12%	\$110.73	-5%
Average Change	24%		Total Change	44%

Table 2-40: Baldwin Hills Bill Analysis

Year	Average Bill			% Increase Avg Bill with Surcharges and CPUC Fee
	Base Rates	% Increase	With Surcharges and CPUC Fee	
2015	\$50.41	5%	\$53.03	
2016	\$51.37	21%	\$62.36	18%
2017	\$54.40	23%	\$66.94	7%
2018	\$57.09	30%	\$74.06	11%
2019	\$55.68	41%	\$78.63	6%
2020	\$61.18	41%	\$86.37	10%
2021	\$61.99	44%	\$89.18	3%
2022	\$60.98	22%	\$74.65	-16%
2023	\$61.82	22%	\$75.16	1%
2024	\$75.33	16%	\$87.03	16%
2025	\$78.86	12%	\$88.05	1%
Average Change	27%		Total Change	56%

Table 2-41: Duarte Bill Analysis

Year	Average Bill			% Increase Avg Bill with Surcharges and CPUC Fee
	Base Rates	% Increase	With Surcharges and CPUC Fee	
2015	\$40.35	15%	\$46.30	
2016	\$42.00	32%	\$55.33	20%
2017	\$47.92	32%	\$63.39	15%
2018	\$51.25	47%	\$75.30	19%
2019	\$54.11	44%	\$77.88	3%
2020	\$62.75	42%	\$88.94	14%
2021	\$59.59	32%	\$78.50	-12%
2022	\$68.97	24%	\$85.41	9%
2023	\$63.58	22%	\$77.77	-9%
2024	\$83.31	14%	\$95.20	22%
2025	\$83.75	11%	\$92.91	-2%
Average Change	30%		Total Change	79%

Table 2-42: San Marino Bill Analysis

Year	Average Bill			% Increase Avg Bill with Surcharges and CPUC Fee
	Base Rates	% Increase	With Surcharges and CPUC Fee	
2015	\$64.36	4%	\$66.68	
2016	\$67.65	15%	\$77.67	16%
2017	\$57.55	23%	\$71.02	-9%
2018	\$61.45	32%	\$80.89	14%
2019	\$59.91	23%	\$73.65	-9%
2020	\$68.12	23%	\$83.48	13%
2021	\$69.37	26%	\$87.21	4%
2022	\$83.33	24%	\$102.92	18%
2023	\$77.37	22%	\$94.20	-8%
2024	\$100.17	15%	\$114.95	22%
2025	\$99.11	10%	\$109.20	-5%
Average Change	21%		Total Change	57%

1 **IV. CONCLUSION**

2 Cal Advocates recommends tiered rate designs that are more equitable, provide
3 needed relief to residential customers, maintain intended conservation signals and are rate
4 neutral. This is especially true for the Monterey Main District customers that have long
5 endured an outdated Cal Am rate design that has led to extremely high surcharges.
6 Correcting Monterey Main District's rate design eliminates Cal Am's justification of
7 changing the CAP discount.

CHAPTER 3 Conservation and Special Requests 5 and 6

2 I. INTRODUCTION

3 In Cal Am’s current application for the GRC cycle (2027-2029), Cal Am proposes
4 a total conservation budget of \$4,255,000 (excluding the Capital Expenditure (CAPEX)
5 portion of \$427,500 and the CAP portion of \$292,000).¹¹¹ This budget proposal is 36.8%
6 higher than the 2022 GRC budget and 22.8% higher than the previously approved 2019
7 GRC budget.¹¹²

8 For Special Request 5, Cal Am proposes to delay certain parts of the
9 approved/proposed acquisition consolidations and apply some existing and proposed
10 surcharges to Cal Am's systems that were recently acquired.¹¹³ Cal Am proposes, in
11 Special Request 6, that, after the filing of this GRC application, it be authorized to
12 integrate any rate changes into new rates and to incorporate these changes into present
13 rates.¹¹⁴

14 II. SUMMARY OF RECOMMENDATIONS

15 To reflect the continued growth of conservation oriented Cal Am ratepayers,
16 prevent unwarranted high rate impact, apply certain existing and proposed surcharges to
17 Cal Am's recently acquired systems, and integrate rate changes into new rates and into
18 present rates, the Commission should:

19 • Not authorize Cal Am's conservation proposed budget of \$4,255,000
20 (excluding the CAPEX portion of \$427,500 and CAP portion of \$292,000) and
21 suspend Cal Am's conservation budget completely.

111 Direct Testimony of Patrick Pilz at 28, Lines 18-22.

112 Direct Testimony of Patrick Pilz at 29, Lines1-3.

113 Application at 9.

114 Application at 9

1 • Adopt Special Request 5.

2 • Adopt Special Request 6.

3 **III. ANALYSIS**

4 **A. Conservation Budget**

5 Cal Am proposes a total conservation budget for this GRC cycle (2027-
6 2029) that is 36.8% higher than the 2022 GRC budget and 22.8% higher than the
7 2019 GRC budget approved previously.¹¹⁵ The total three year conservation
8 budget that Cal Am is asking for is \$4,255,000 (excluding the CAPEX portion of
9 \$427,500 and CAP portion of \$292,000).¹¹⁶ Cal Am claims that the proposed
10 conservation budget is necessary to comply with state regulations and policies
11 pertaining to water conservation and water loss management.¹¹⁷

12 Conservation is already the way of life in California. As discussed in Cal
13 Advocates' testimony on Special Request #1,¹¹⁸ Cal Am's ratepayers have
14 adopted smarter and more conscious water use habits through experiences over
15 time with any weather condition, whether it be periods of drought and extreme
16 rainfall. California's water use behaviors have changed through the statewide
17 focus and implementation of conservation messaging, education, and programs
18 since 2008.¹¹⁹ Having an inclining tiered rate design for so many years has

¹¹⁵ Direct Testimony of Patrick Pilz at 29, Lines 1-3.

¹¹⁶ Direct Testimony of Patrick Pilz at 28, Lines 18-22.

¹¹⁷ Direct Testimony of Patrick Pilz at 26, Line 27-27, Line 3.

¹¹⁸ Cal Advocates' testimony of Sam Lam, Report on Labor & Benefits, Performance-Based Compensation, Special Request No. 1 & No. 7, Chapter 3.

¹¹⁹ Cal Advocates' testimony of Sam Lam, Report on Labor & Benefits, Performance-Based Compensation, Special Request No. 1 & No. 7, Chapter 3. The analysis and testimony of Cal Advocates' witness Sam Lam addresses the CART.

enabled Cal Am's ratepayers to adapt to the conservation pricing structure.¹²⁰

This is evident in how much less water Cal Am's ratepayers use.

One measure that shows less water usage is the Estimated Monthly Residential Gallons Per Capita Day (R-GPCD) for Cal Am calculated by the California Water Board that shows between a 6% to 18% decrease in usage for Cal Am's service areas from 2019 to 2025 for the first eight months of the year.¹²¹

Table 3-1: Los Angeles R-GPCD

Month	2019 RGPCD	% Change	2025 RGPCD
January	98	1%	99
February	75	5%	79
March	83	-2%	81
April	126	-29%	89
May	119	-19%	96
June	132	-10%	119
July	142	-2%	139
August	179	-28%	129
September	153	-9%	139
Average		-10%	

¹²⁰ “The impact of pricing structure change on residential water”, Journal of Water Resources and Economics (2024), at 12.

¹²¹ The State Water Resources Control Board, Supplier Conservation, available at: https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/conservation_reporting.html [accessed December 12, 2025]

Table 3-2: Monterey R-GPCD

Month	2019 RGPCD	% Change	2025 RGPCD
January	48	-30%	34
February	49	-8%	45
March	49	-8%	45
April	55	-15%	47
May	44	11%	49
June	67	-6%	63
July	64	-3%	62
August	70	-9%	64
September	67	-7%	62
Average		-8%	

Table 3-3: Sacramento R-GPCD

Month	2019 RGPCD	% Change	2025 RGPCD
January	61	8%	66
February	59	14%	67
March	58	-7%	54
April	76	-16%	64
May	92	-5%	87
June	119	-8%	109
July	145	-17%	120
August	136	-15%	115
September	125	-7%	116
Average		-6%	

Table 3-4: San Diego R-GPCD

Month	2019 RGPCD	% Change	2025 RGPCD
January	55	-7%	51
February	52	-12%	46
March	56	-18%	46
April	73	-36%	47
May	61	-16%	51
June	70	-27%	51
July	62	-10%	56
August	71	-18%	58
September	67	-18%	55
Average		-18%	

Table 3-5: Ventura R-GPCD

Month	2019 RGPCD	% Change	2025 RGPCD
January	88	18%	104
February	71	4%	74
March	89	-17%	74
April	142	-48%	74
May	128	-18%	105
June	151	-27%	110
July	135	-13%	118
August	169	-24%	128
September	161	-21%	127
Average		-16%	

1 Another example of less water usage for Cal Am is the average monthly
2 water usage for an average residential bill for the service areas. The table below
3 shows an average decrease of 17% in average monthly water usage for an average
4 residential bill for Cal Am.

Table 3-6: Average Monthly Usage per Average Residential Customer Bill¹²² ¹²³

District	CCF		% Decrease
	2019	2025	
Sacramento	10.5	8.2	-22%
Larkfield	8.2	6.7	-18%
Meadowbrook	16.6	11.9	-28%
Monterey Main	4.5	4.2	-6%
Monterey Satellites	10.9	8.9	-18%
San Diego	8.1	7.4	-9%
Ventura	14.6	12.1	-17%
Baldwin Hills	12.4	10.4	-16%
Duarte	14.8	11.8	-20%
San Marino	17.7	14.4	-19%
		Average	-17%

1 Cal Am's ratepayers have made conservation a way of life and, as a result,
 2 have been using less water. As mentioned in Cal Advocates' testimony on Special
 3 Request #1, California's reservoirs are at strong levels.¹²⁴ The reservoirs are
 4 currently at 130% of the historical average. The implementation of Cal
 5 Advocates' conservation rate design and the CART mechanism is reasonable in
 6 promoting continued conservation. The wet season is poised to contribute even
 7 further to improving the levels of the reservoirs as well as the fact that California
 8 is free of drought conditions for the first time in 25 years.¹²⁵ ¹²⁶

¹²² Attachment 2-14: Cal Am Response to Cal Advocates' TY 2024 Data Request HMC-01, Question 4, contains an analysis of Cal Am's average monthly bill for residential customers by district provided in excel spreadsheets per district.

¹²³ Attachment 2-2: Cal Am Response to Cal Advocates' TY 2027 Data Request A.25-07-003, Cal Am Response to Public Advocates Data Request HMC-001, Question 2, contains an analysis of Cal Am's average monthly bill for residential customers by district provided in excel spreadsheets per district.

¹²⁴ Cal Advocates' testimony of Sam Lam, Report on Labor & Benefits, Performance-Based Compensation, Special Request No. 1 & No. 7, Chapter 3..

¹²⁵ U.S. Drought Monitor, California, available at: <https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA> [accessed January 8, 2026]

¹²⁶ SFGATE, available at: <https://www.sfgate.com/bayarea/article/california-free-drought-conditions->

Table 3-7: California Reservoir Levels (as of 1/7/26)¹²⁷

Reservoir	Hist Avg	Actual	Actual Hist Avg %
Shasta	2,731.2	3,687.1	135%
Oroville	1,950.9	2,653.2	136%
New Bullards Bar	608.5	772.8	127%
Folsom	406.0	625.3	154%
Camanche	246.9	308.6	125%
Trinity	1,472.2	2,031.6	138%
New Melones	1,339.5	1,728.0	129%
Don Pedro	1,400.0	1,624.0	116%
Sonoma	216.9	281.9	130%
San Luis	1,329.5	1,449.1	109%
McClure	452.6	697.0	154%
Cachuma	122.3	193.3	158%
Casitas	196.4	249.4	127%
Castaic	251.7	256.8	102%
Diamond Valley	581.2	761.4	131%
Millerton	280.6	395.6	141%
Pine Flat	349.6	430.0	123%
Total	13,935.9	18,145.1	131%
		Weighted Average	130%

1 As mentioned, Cal Advocates' conservation inclining tiered rate design and
 2 the CART mechanism will promote continued conservation. The State Water
 3 Resources Control Board has authority under the California Water Code to adopt
 4 emergency regulations for water conservation in response to drought

21284480.php

¹²⁷ California Data Exchange, California Department of Water Resources, available at: <https://cdec.water.ca.gov/resapp/RescondMain> [accessed January 7, 2026]

1 emergencies.¹²⁸, ¹²⁹ Conservation is now a way of life for Cal Am ratepayers as
2 evidenced by the continued reduction of water use. This is despite Cal Am
3 historically using less than authorized of the conservation budget and proposing
4 less of a budget in the last GRC.¹³⁰, ¹³¹, ¹³² The conservation programs that Cal
5 Am proposes are not necessary, especially the informational ones (i.e., Public
6 Information, School Education, Residential Water Surveys, etc.) since Cal Am's
7 ratepayers have responded to conservation rate design signals for years.
8 Therefore, the Commission should deny Cal Am's conservation budget proposal
9 and suspend Cal Am's conservation budget for this rate case cycle.

10 **B. Special Request 5 - Rate Mitigation, Surcharges and
11 Mechanisms Applicable to Certain Acquired Systems**

12 In Special Request #5, Cal Am requests to place certain recently acquired
13 systems onto transitional standalone rate designs.¹³³ Cal Am also proposes to
14 apply certain surcharges to Cal Am's recently acquired systems.¹³⁴ Except for Cal
15 Am's request to establish the Fixed Cost Recovery Account ("FCRA"), Cal

¹²⁸ Cal Advocates' testimony of Sam Lam, Report on Labor & Benefits, Performance-Based Compensation, Special Request No. 1 & No. 7, Chapter 3. The analysis and testimony of Cal Advocates' witness Sam Lam address the CART.

¹²⁹ California Water Code Section 1058.5; Form STD 400, State of California Office of Administrative Law, available at: https://www.waterboards.ca.gov/drought/mill_deer_creeks/docs/form-400-and-adopted-regulation-text.pdf

¹³⁰ D.21-11-018, Appendix B at 30. The settlement between Cal Am, Cal Advocates, and the Cities of Duarte, San Marino, and Thousand Oaks authorized a conservation budget of \$3,946,572 for Cal Am for the 2021-2023 GRC cycle.

¹³¹ Cal Am RO Model file: "ALL_CH04_O&M_RO", tab: "OM Data Rec w-Trf-Elim WS3," shows \$3,439,548 spent on conservation by Cal Am during the 2021-2023 GRC cycle.

¹³² D.24-12-025, Attachment 1 at 18. The settlement agreement between Cal Am and Cal Advocates authorized a conservation budget of \$3,121,600 for Cal Am for the 2024-2026 GRC cycle.

¹³³ *Application of California-American Water Company (U210W) to Increase Revenues in Each of its Districts Statewide*, Direct Testimony of Jonathan Morse at 3, Lines 10-12.

¹³⁴ Direct Testimony of Jonathan Morse at 3, Lines 13-14.

1 Advocates does not oppose Special Request 5, provided that the Commission
2 adopts the rate design recommendations presented in Chapter 2.

3 First, Cal Am seeks a consolidated stand-alone rate design for Bellflower,
4 East Pasadena, and Piru in its Southern Division; standalone rate designs for Bass
5 Lake, West San Martin, and Yerba Buena; and that the transition of the
6 Meadowbrook rates to Sacramento rates be delayed for this rate case.¹³⁵ ¹³⁶ ¹³⁷ For
7 the recently acquired systems, Cal Am proposes to more closely align its rate
8 designs to its respective divisional rate designs. For Meadowbrook, Cal Am
9 requests an interim rate design to mitigate the rate impact of consolidation with the
10 Northern District on Meadowbrook customers.

11 It makes sense to closely align the rate designs of the recently acquired
12 systems to their respective divisional rate designs before considering consolidating
13 them to those divisions. A gradual alignment reduces significant rate impacts on
14 ratepayers. Similarly, Meadowbrook should be consolidated into the Sacramento
15 district once the average consumption of Meadowbrook customers is more aligned
16 with Sacramento customers. The Commission approved consolidation of the
17 Meadowbrook service area into Cal Am's Sacramento District for ratemaking
18 purposes in 2016, but the average consumption of Meadowbrook customers is still
19 higher than that of Sacramento customers.¹³⁸ Accordingly, when Cal Am
20 consolidates the tariffs of these two districts, Meadowbrook customers will either
21 have to reduce consumption or face large bill increases.

22 The Commission should adopt Cal Advocates' recommended tiered rate
23 structures, tier breakpoints and step-ups in commodity rates as presented in
24 Chapter 2. Provided that the Commission adopts these recommendations, Cal

¹³⁵ Direct Testimony of Jonathan Morse at 4, Lines 9-10.

¹³⁶ Direct Testimony of Jonathan Morse at 4, Lines 16-17.

¹³⁷ Direct Testimony of Jonathan Morse at 5, Lines 3-4.

¹³⁸ D.16-12-014.

1 Advocates does not otherwise oppose this portion of Cal Am’s Special Request 5
2 request.

3 Secondly, Cal Am proposes that all recent acquisitions should be eligible
4 for its CAP, which would include the addition of a CAP surcharge to non-CAP
5 customers. Also, Cal Am proposes to add surcharges related to its Consolidated
6 Expense Balancing Account (“CEBA”), add surcharges or sur-credits related to
7 the Conservation Adjustment for Rate Tier Designs (“CART”) and Incremental
8 Cost Balancing Account (“ICBA”) and include the Fixed Cost Recovery Account
9 (“FCRA”). Specifically, Cal Am requests the following surcharges for its recent
10 acquisitions:

- 11 • For Bass Lake in the Northern Division, Cal Am proposes to add the CAP
12 in 2025 and the CEBA surcharge.
- 13 • For Corral de Tierra, Cal Am proposes to add all surcharges applicable to
14 the Central Satellite service area including CAP and CEBA surcharges
15 when Corral de Tierra transitions onto Central Satellite rates.
- 16 • For West San Martin and Yerba Buena, the Company proposes to add the
17 CAP and CEBA in 2027.
- 18 • For of these four service areas to be included in the FCRA in 2027 with the
19 implementation of new rates.

20 Cal Advocates does not oppose most requests in this section except for one
21 item. The Commission should deny Cal Am’s request to establish the FCRA in all
22 its acquisitions. The FCRA is substantially the same as the WRAM, which was
23 barred from use.¹³⁹

¹³⁹ Cal Advocates’ testimony of Sam Lam, Report on Labor & Benefits, Performance-Based Compensation, Special Request No. 1 & No. 7, Chapter 3. The analysis and testimony of Cal Advocates’ witness Sam Lam address the FCRA.

1 **C. Special Request 6 - Subsequent Rate Changes**

2 With certain stipulations, the Commission should approve Cal Am's
3 Special Request 6 regarding authorization of subsequent rate changes. Cal Am
4 defines "subsequent rate changes" as any change to base rates that has occurred
5 since July 1, 2025, when Cal Am filed its GRC application, up to the start of TY
6 2027.¹⁴⁰ Special Request 6 would allow Cal Am to incorporate rate changes
7 during that time into present rates. Cal Am proposes two components to add the
8 changes into the calculation of new rates.¹⁴¹ The first is to adjust the "present
9 rates" that will appear in the Commission's final decision, for purposes of
10 comparing present rates against the newly adopted rates.¹⁴² The second is to
11 confirm that the revenue requirement model for the new rates includes the rate
12 changes made after this GRC application.¹⁴³ Consequently, Cal Am seeks
13 authorization to incorporate the additional revenue requirement from subsequent
14 rate changes into the final GRC rates for the 2027 TY.

15 The Commission should allow Cal Am to incorporate subsequent rate
16 changes. These changes to present and proposed rate revenue should only be
17 allowed by the Commission prior to issuing a final decision in this GRC.

18 **IV. CONCLUSION**

19 Conservation is a way of life for Cal Am ratepayers. For almost two decades, the
20 conservation focus has been ingrained in ratepayer behavior. Further conservation can be
21 promoted through Cal Advocates' rate design recommendations and the CART. Thus,
22 Cal Am's conservation budget should be suspended for the current GRC cycle. Also,
23 Special Requests 5 and 6 should be adopted to avoid high rate impacts, to promote

¹⁴⁰ Direct Testimony of Jonathan Morse at 7, Lines 9-11.

¹⁴¹ Direct Testimony of Jonathan Morse at 8, Lines 11-12.

¹⁴² Direct Testimony of Jonathan Morse at 8, Lines 12-14.

¹⁴³ Direct Testimony of Jonathan Morse at 8, Lines 14-16.

1 ratepayer equity by applying some surcharges to Cal Am's recently acquired systems,
2 and to integrate rate changes.
3

Attachment 1-1: Qualifications of Witness

QUALIFICATIONS AND PREPARED TESTIMONY OF HERBERT MERIDA

Q.1 Please state your name and address.

A.1 My name is Herbert Merida. My business address is 505 Van Ness Avenue, San Francisco, California, 94102.

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

A.2 I am a Public Utilities Regulatory Analyst IV in the Water Branch of the Public Advocates Office.

Q.3 Please describe your educational and professional experience.

A.3 I graduated from San Francisco State University with a Bachelor of Science Degree in International Business Management, a minor in Economics, and a Master of Business Administration Degree. Regarding my professional experience, I have been employed by the California Public Utilities Commission for over 18 years and have worked on many general rate case proceedings. Also, I have held a variety of positions at Levi Strauss & Co., Siemens A.G., the Employment Development Department, the State Compensation Insurance Fund, and most recently the California Public Utilities Commission.

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

A.4 I am responsible for Water Consumption and Revenues, Rate Design, Conservation and Special Requests 5 and 6 in this proceeding.

Q.5 Does that complete your prepared testimony?

A.5 Yes, it does.

Attachment 1-2: Cal Am Response to Cal Advocates' TY 2027 Data Request HMC-02

(Excel attachments referenced in Cal Am's response are not attached due to file size but
available upon request)

**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.

Application 25-07-003
(Filed July 1, 2025)

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

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Attorneys for California-American Water Company

Dated: July 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 HMC-02 (“Data Requests” or “RPD”), propounded on July 15, 2025, in A.25-07-003.

RESERVATION OF RIGHTS

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

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

GENERAL OBJECTIONS

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

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

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

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

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

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

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

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

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

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

California-American Water Company

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

Response Provided By: **Patrick R Pilz**
Title: **Senior Manager Field Operations**
Address: **California American Water
655 West Broadway #1410
San Diego**
Cal Adv Request: **A2507003 Public Advocates DR HMC-02**
Company Number: **Cal Adv HMC-02 Q001**
Date Received: **July 15, 2025**
Date Response Provided: **July 29, 2025**
Subject Area: **Revenues**

DATA REQUEST:

1. Regarding testimony “Mitchell, David Direct Testimony CAW 2025 GRC Final App”, please provide the residential gallons per capita day (R-GPCD) for January 2025 for the Monterey Main District.

CAL-AM'S RESPONSE

California American Water's residential gallons per capita per day usage for the Monterey Main District in January 2025 was 33.74.

California-American Water Company

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

Response Provided By: Bahman Pourtaherian
Title: Principal Consultant
Address: Blue Planet Utility Consulting
55 Drohan Dr.
Guelph, Ontario, Canada
Cal Adv Request: A2507003 Public Advocates DR HMC-02
Company Number: Cal Adv HMC-02 Q002
Date Received: July 15, 2025
Date Response Provided: July 29, 2025
Subject Area: Revenues

DATA REQUEST:

2. Regarding workpaper "All_CH03_REV_RO_Sales-Customers", tab "Proj Cust Calc WS-03" for the Central Satellites service area, please explain how Cal Am derived the "One Time Adjustments for Customer Growth" amount found in cell "AO40". Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

Cell "AO40" in the referenced tab reflects inclusion of 15 new customers into the Central Satellite service area following the acquisition of Corral De Tierra.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
 55 Drohan Dr.
 Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-02**
Company Number: **Cal Adv HMC-02 Q003**
Date Received: **July 15, 2025**
Date Response Provided: **July 29, 2025**
Subject Area: **Revenues**

DATA REQUEST:

3. Regarding workpaper "All_CH03_REV_RO_Sales-Customers", tab "Proj Cust Calc WS-03" for the Piru (Warring) service area, please explain how Cal Am derived the "One Time Adjustments for Customer Growth" amounts found in cells "AQ120" and "AR120". Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

California American Water forecasts that the Piru service area is expected to grow by 35 customers annually from 2025 through 2027 due to development. This anticipated growth is embedded within the annual projections for those years. However, since no customer growth is forecast for 2028 and 2029, a one-time adjustment of -35 customers was applied in each of those years to offset the previously assumed annual increase. This ensures the forecast reflects accurate customer counts over the full projection horizon.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
 55 Drohan Dr.
 Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-02**
Company Number: **Cal Adv HMC-02 Q004**
Date Received: **July 15, 2025**
Date Response Provided: **July 29, 2025**
Subject Area: **Revenues**

DATA REQUEST:

4. Regarding workpaper "All_CH03_REV_RO_Sales-Customers", tab "Proj Cust Calc WS-03" for the Bass Lake service area, please explain how Cal Am derived the "One Time Over-Ride for Customer Average" amounts found in cells "AT162", "AU162", "AS163", "AT163", "AS168", and "AT168". Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

The referenced adjustments reflect the planned acquisition and metering schedule associated with the pending purchase of the Bass Lake system.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
 55 Drohan Dr.
 Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-02**
Company Number: **Cal Adv HMC-02 Q005**
Date Received: **July 15, 2025**
Date Response Provided: **July 29, 2025**
Subject Area: **Revenues**

DATA REQUEST:

5. Regarding workpaper "All_CH03_REV_RO_Sales-Customers", tab "Proj Cust Calc WS-03" for the Corral De Tierra service area, please explain how Cal Am derived the "One Time Adjustments for Customer Growth" amount found in cell "AP169" and the "One Time Over-Ride for Customer Average" amounts found in cells "AT169" and "AS170". Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

The referenced cells reflect the inclusion of customer counts related to the acquisition of the Corral de Tierra system.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
 55 Drohan Dr.
 Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-02**
Company Number: **Cal Adv HMC-02 Q006**
Date Received: **July 15, 2025**
Date Response Provided: **July 29, 2025**
Subject Area: **Revenues**

DATA REQUEST:

6. Regarding workpaper "All_CH03_REV_RO_Sales-Customers", tab "Proj Cust Calc WS-03" for the West San Martin service area, please explain how Cal Am derived the "One Time Over-Ride for Customer Average" amounts found in cells "AS171", "AT171", "AS173", and "AT173". Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

The referenced cells reflect the inclusion of customer counts related to the acquisition of the West San Martin system.

California-American Water Company

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

Response Provided By: Bahman Pourtaherian
Title: Principal Consultant
Address: Blue Planet Utility Consulting
55 Drohan Dr.
Guelph, Ontario, Canada
Cal Adv Request: A2507003 Public Advocates DR HMC-02
Company Number: Cal Adv HMC-02 Q007
Date Received: July 15, 2025
Date Response Provided: July 29, 2025
Subject Area: Revenues

DATA REQUEST:

7. Regarding workpaper "All_CH03_REV_RO_Sales-Customers", tab "Proj Cust Calc WS-03" for the Yerba Buena service area, please explain how Cal Am derived the "One Time Over-Ride for Customer Average" amounts found in cells "AS178", "AT178", "AS179", "AT179" "AS181", and "AT181". Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

The referenced cells reflect the inclusion of customer counts related to the pending acquisition of the Yerba Buena system.

California-American Water Company

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

Response Provided By: Kristina Remelius
Title: Project Manager Operations
Address: California American Water
655 West Broadway #1410
San Diego
Cal Adv Request: A2507003 Public Advocates DR HMC-02
Company Number: Cal Adv HMC-02 Q008
Date Received: July 15, 2025
Date Response Provided: July 29, 2025
Subject Area: Revenues

DATA REQUEST:

8. Regarding workpaper "All_CH03_REV_RO_Revenues", tab "SD_Revenues Othr Forcst", please provide in a workable Excel format the recorded years 2020 through 2024 and calculations for the "Antenna Leases", "Rents", and "Other" categories found in columns "J" through "M". Also provide supporting documentation.

CAL-AM'S RESPONSE

Please see attachments:

CAW Response Cal Adv HMC-02 Q008 Attachment 1 CONFIDENTIAL

CAW Response Cal Adv HMC-02 Q008 Attachment 2

California-American Water Company

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

Response Provided By: Kristina Remelius
Title: Project Manager Operations
Address: California American Water
655 West Broadway #1410
San Diego
Cal Adv Request: A2507003 Public Advocates DR HMC-02
Company Number: Cal Adv HMC-02 Q009
Date Received: July 15, 2025
Date Response Provided: July 29, 2025
Subject Area: Revenues

DATA REQUEST:

9. Regarding workpaper "All_CH03_REV_RO_Revenues", tab "SD_Revenues Othr Forcst", please provide in a workable Excel format the itemized entries for miscellaneous service revenue for the recorded years 2020 through 2024. Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

Please see CAW Response Cal Adv HMC-02 Q009 Attachment 01.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
 55 Drohan Dr.
 Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-02**
Company Number: **Cal Adv HMC-02 Q010**
Date Received: **July 15, 2025**
Date Response Provided: **July 29, 2025**
Subject Area: **Revenues**

DATA REQUEST:

10. Regarding workpaper “All_CH03_REV_RO_Water Production”, tab “Projected Wtr Prod WS-04” for the Bass Lake service area, please explain how the non-revenue water amounts found in cells “IU134” through “IY134” are calculated. Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

Non revenue water for Bass Lake is based on California American Water's general assessment of NRW at 20%.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
 55 Drohan Dr.
 Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-02**
Company Number: **Cal Adv HMC-02 Q011**
Date Received: **July 15, 2025**
Date Response Provided: **July 29, 2025**
Subject Area: **Revenues**

DATA REQUEST:

11. Regarding workpaper “All_CH03_REV_RO_Water Production”, tab “Projected Wtr Prod WS-04” for the Corral De Tierra service area, please explain why the non-revenue water percentages found in cells “JK135” through “JO135” are 100%. Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

Non-revenue water (NRW) for Corral de Tierra is based on California American Water's assessment of NRW at 25%. NRW for the Corral De Tierra service area in projected years should be 0 as data for Corral De Tierra customers is included in the data for Central Satellites. California American Water will reflect this adjustment in the 100 Day update and reflect Corral De Tierra NRW in Central Satellites.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
 55 Drohan Dr.
 Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-02**
Company Number: **Cal Adv HMC-02 Q012**
Date Received: **July 15, 2025**
Date Response Provided: **July 29, 2025**
Subject Area: **Revenues**

DATA REQUEST:

12. Regarding workpaper “All_CH03_REV_RO_Water Production”, tab “Projected Wtr Prod WS-04” for the West San Martin service area, please explain how the non-revenue water amounts found in cells “KA134” through “KE134” are calculated. Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

West San Martin non-revenue water (NRW) was based on West San Martin's 2023 annual report. Note that NRW in this service area should be 14,350 and will be updated in 100 Day Update.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
 55 Drohan Dr.
 Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-02**
Company Number: **Cal Adv HMC-02 Q013**
Date Received: **July 15, 2025**
Date Response Provided: **July 29, 2025**
Subject Area: **Revenues**

DATA REQUEST:

13. Regarding workpaper “All_CH03_REV_RO_Water Production”, tab “Projected Wtr Prod WS-04” for the Yerba Buena service area, please explain how the non-revenue water amounts found in cells “KQ134” through “KU134” are calculated. Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

Non-revenue water (NRW) for Yerba Buena is based on California American Water's assessment of NRW at 25%.

Attachment 2-1: Monthly Meter Charges Test Year 2027

Sacramento Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
5/8"	\$39.18	\$29.52	\$31.65
0.75"	\$58.78	\$44.28	\$47.48
1"	\$97.96	\$73.80	\$79.13
1.5"	\$195.92	\$147.59	\$158.25
2"	\$313.47	\$236.15	\$253.20
3"	\$587.75	\$442.78	\$474.76
4"	\$979.59	\$737.97	\$791.26
6"	\$1,959.18	\$1,475.94	\$1,582.52
8"	\$3,134.69	\$2,361.50	\$2,532.03
10"	\$4,506.12	\$3,394.66	\$3,639.80

Meadowbrook Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
5/8"	\$29.44	\$26.63	\$28.25
0.75"	\$44.16	\$39.94	\$42.37
1"	\$73.60	\$66.57	\$70.61
1.5"	\$147.21	\$133.15	\$141.23
2"	\$235.54	\$213.03	\$225.97
3"	\$441.63	\$399.44	\$423.69
4"	\$736.05	\$665.73	\$706.15
6"	\$1,472.09	\$1,331.46	\$1,412.30
8"	\$2,355.35	\$2,130.33	\$2,259.68
10"	\$3,385.82	\$3,062.35	\$3,248.29

Larkfield Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
5/8"	\$33.35	\$22.34	\$21.07
0.75"	\$50.02	\$33.51	\$31.61
1"	\$83.37	\$55.85	\$52.68
1.5"	\$166.75	\$111.71	\$105.36
2"	\$266.80	\$178.74	\$168.57
3"	\$500.25	\$335.13	\$316.07
4"	\$833.74	\$558.55	\$526.79
6"	\$1,667.48	\$1,117.10	\$1,053.58
8"	\$2,667.97	\$1,787.36	\$1,685.73
10"	\$3,835.21	\$2,569.32	\$2,423.23

Monterey Main Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
5/8"	\$50.53	\$46.73	\$56.15
0.75"	\$75.80	\$73.14	\$87.87
1"	\$126.33	\$128.52	\$154.40
1.5"	\$252.65	\$303.54	\$364.67
2"	\$404.24	\$499.13	\$599.65
3"	\$757.95	\$935.86	\$1,124.34
4"	\$1,263.25	\$1,594.12	\$1,915.17
6"	\$2,526.50	\$3,290.60	\$3,953.30
8"	\$4,042.40	\$5,264.91	\$6,325.22
10"	\$5,810.95		\$6,456.88

Central Satellites Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
5/8"	\$30.87	\$21.68	\$22.47
0.75"	\$46.31	\$32.51	\$33.71
1"	\$77.18	\$54.19	\$56.18
1.5"	\$154.35	\$108.38	\$112.36
2"	\$246.96	\$173.40	\$179.77
3"	\$463.05	\$325.13	\$337.07
4"	\$771.76	\$541.89	\$561.79
6"	\$1,543.51	\$1,083.78	\$1,123.58
8"	\$2,469.62	\$1,734.04	\$1,797.73
10"	\$3,550.08		\$2,584.23

West San Martin Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
5/8"	\$27.21	\$26.57	\$27.21
0.75"	\$27.21	\$26.57	\$27.21
1"	\$38.09	\$37.20	\$38.09
1.5"	\$49.00	\$47.85	\$49.00
2"	\$65.31	\$63.78	\$65.31
3"	\$81.65	\$79.74	\$81.65
4"	\$95.26	\$93.03	\$95.26
6"	\$163.28	\$159.45	\$163.28
8"	\$217.72	\$212.62	\$217.72
10"	\$272.15	\$265.77	\$272.15

Southern Division Meter Service Charges Comparison¹⁴⁴

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
5/8"	\$40.93	\$23.74	\$24.67
0.75"	\$61.40	\$35.61	\$37.01
1"	\$102.33	\$59.35	\$61.69
1.5"	\$204.66	\$118.70	\$123.37
2"	\$327.46	\$189.92	\$197.40
3"	\$613.99	\$356.09	\$370.12
4"	\$1,023.31	\$593.49	\$616.87
6"	\$2,046.63	\$1,186.98	\$1,233.75
8"	\$3,274.61	\$1,899.16	\$1,974.00
10"	\$4,707.24	\$2,730.04	\$2,837.62

Southern Transition Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Requested Rates
5/8"	\$27.60	\$19.01
0.75"	\$41.41	\$28.52
1"	\$69.01	\$47.53
1.5"	\$138.02	\$95.06
2"	\$220.83	\$152.10
3"	\$414.05	\$285.19
4"	\$690.09	\$475.32
6"	\$1,380.18	\$950.65
8"	\$2,208.29	\$1,521.04
10"	\$3,174.42	\$2,186.49

¹⁴⁴ Comprised of Baldwin Hills, Duarte, San Diego, San Marino, and Ventura.

Bellflower Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
5/8"	\$27.60	\$23.17	\$19.01
0.75"	\$41.41	\$34.76	\$28.52
1"	\$69.01	\$57.93	\$47.53
1.5"	\$138.02	\$115.86	\$95.06
2"	\$220.83	\$185.38	\$152.10
3"	\$414.05	\$347.58	\$285.19
4"	\$690.09	\$579.30	\$475.32
6"	\$1,380.18	\$1,158.60	\$950.65
8"	\$2,208.29	\$1,853.76	\$1,521.04
10"	\$3,174.42	\$2,664.77	\$2,186.49

East Pasadena Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
5/8"	\$27.60	\$15.77	\$19.01
0.75"	\$41.41	\$23.65	\$28.52
1"	\$69.01	\$39.42	\$47.53
1.5"	\$138.02	\$78.85	\$95.06
2"	\$220.83	\$126.16	\$152.10
3"	\$414.05	\$236.55	\$285.19
4"	\$690.09	\$394.24	\$475.32
6"	\$1,380.18	\$788.49	\$950.65
8"	\$2,208.29	\$1,261.58	\$1,521.04
10"	\$3,174.42	\$1,813.52	\$2,186.49

Piru/Warring Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
5/8"	\$27.60	\$30.91	\$19.01
0.75"	\$41.41	\$46.36	\$28.52
1"	\$69.01	\$77.27	\$47.53
1.5"	\$138.02	\$154.54	\$95.06
2"	\$220.83	\$247.27	\$152.10
3"	\$414.05	\$463.63	\$285.19
4"	\$690.09	\$772.71	\$475.32
6"	\$1,380.18	\$1,545.42	\$950.65
8"	\$2,208.29	\$2,472.68	\$1,521.04
10"	\$3,174.42	\$3,554.47	\$2,186.49

Yerba Buena Meter Service Charges Comparison

Meter Size / Service Connection	Cal Adv Recommended Rates	Cal Am Current Rates	Cal Am Requested Rates
0.75"	\$67.77	\$66.18	\$67.77
1"	\$169.42	\$165.45	\$169.42
1.5"	\$338.84	\$330.90	\$338.84
2"	\$542.15	\$529.44	\$542.15
3"	\$1,016.52	\$992.70	\$1,016.52
4"	\$1,694.21	\$1,654.50	\$1,694.21

Attachment 2-2: Cal Am Response to Cal Advocates' TY 2027 Data Request HMC-01

(Excel attachments referenced in Cal Am's response are not attached due to file size but available upon request)

**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.

Application 25-07-003
(Filed July 1, 2025)

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

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Attorneys for California-American Water Company

Dated: July 24, 2025

California-American Water Company

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

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 HMC-01 (“Data Requests” or “RPD”), propounded on July 10, 2025, in A.25-07-003.

RESERVATION OF RIGHTS

1. California American Water’s investigation into the Data Requests is ongoing. The Company reserves the right, without obligating itself to do so, to supplement or modify its responses and to present further information and produce additional documents as a result of its ongoing investigation.
2. Any information or materials provided in response to the Data Requests shall be without prejudice to California American Water’s right to object to their admission into evidence or the record in this proceeding, their use as evidence or in the record, or the relevance of such information or materials. In addition, California American Water reserves its right to object to further discovery of documents, other information or materials relating to the same or similar subject matter upon any valid ground or grounds, including without limitation, the proprietary nature of the information, relevance, privilege, work product, overbreadth, burdensomeness, oppressiveness, or incompetence.

GENERAL OBJECTIONS

1. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they purport to impose upon California American Water any obligations broader than those permitted by law.
2. California American Water objects to the Data Requests as improper, overbroad, and unduly burdensome to the extent they improperly seek the disclosure of information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or doctrine, and/or the client confidentiality

California-American Water Company

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

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

California-American Water Company

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

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: James Kelly
Title: Senior Principal Regulatory Analyst
Address: California American Water
520 Capitol Mall, Suite 630
Sacramento
Cal Adv Request: A2507003 Public Advocates DR HMC-01
Company Number: Cal Adv HMC-01 Q001
Date Received: July 10, 2025
Date Response Provided: July 24, 2025
Subject Area: Rate Design

DATA REQUEST:

1. Regarding the percentage of proposed usage found in Attachment 1 from "Pourtaherian, Bahman Direct Testimony CAW 2025 GRC Final App" and workpaper "All_CH10_RD_RO", in workable Excel format (one Excel file per district), please provide the monthly CCF consumption data for each of Cal Am's customers, by district, for the most recent 12-month period. Please provide a separate Excel Tab/Worksheet for each customer class (i.e., residential single family, residential multi family, commercial, etc.) with a row for each customer and columns for customer identifier, meter size, each month's consumption in CCF, 12-month total, 12-month average, summer average, and winter average. See format example below:

Customer Identifier	Meter Size	Month 1	Month 2	Month 3	Month....	Total	Average	Summer Average	Winter Average
#1	5/8in	7.55	8.12	7.87	...				
#2	3/4in	4.5	6	8.25	...				

CAL-AM'S RESPONSE

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

California-American Water Company

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

to this request on the grounds that it would be unduly burdensome and expensive to provide the data requested in the format requested. Subject to, but without waiving, those objections, California American Water responds as follows.

Customer billing consumption data is provided by district, customer and month for the recent 12-month period of July 1, 2024 to June 30, 2025. The files were segmented by Customer Class in separate worksheets.

Regarding the “Summer Average” and “Winter Average” columns, since no definition was provided, we used April-September to calculate the “Summer Average” and January to March plus October to December to calculate the “Winter Average.”

Please see the following attachments:

- CAW Response Ca Adv HMC-001 Q001 Attachment 01 - 1530
- CAW Response Ca Adv HMC-001 Q001 Attachment 02 - 1540
- CAW Response Ca Adv HMC-001 Q001 Attachment 03 - 1541
- CAW Response Ca Adv HMC-001 Q001 Attachment 04 - 1551
- CAW Response Ca Adv HMC-001 Q001 Attachment 05 - 1552
- CAW Response Ca Adv HMC-001 Q001 Attachment 06 - 1553
- CAW Response Ca Adv HMC-001 Q001 Attachment 07 - 1554
- CAW Response Ca Adv HMC-001 Q001 Attachment 08 - 1556
- CAW Response Ca Adv HMC-001 Q001 Attachment 09 - 1557
- CAW Response Ca Adv HMC-001 Q001 Attachment 10 - 1558
- CAW Response Ca Adv HMC-001 Q001 Attachment 11 - 1559
- CAW Response Ca Adv HMC-001 Q001 Attachment 12 - 1560
- CAW Response Ca Adv HMC-001 Q001 Attachment 13 - 1561
- CAW Response Ca Adv HMC-001 Q001 Attachment 14 - 1563
- CAW Response Ca Adv HMC-001 Q001 Attachment 15 - 1564
- CAW Response Ca Adv HMC-001 Q001 Attachment 16 - 1565
- CAW Response Ca Adv HMC-001 Q001 Attachment 17 - 1566

California-American Water Company

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

- CAW Response Ca Adv HMC-001 Q001 Attachment 18 - 1567
- CAW Response Ca Adv HMC-001 Q001 Attachment 19 - Cent Sat

The customer meter data is provided by district, customer, customer class and meter size as of June 30, 2025.

Please see the following attachment:

- CAW Response Ca Adv HMC-001 Q001 Attachment 20 - Meters

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
55 Drohan Dr.
Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-01**
Company Number: **Cal Adv HMC-01 Q002**
Date Received: **July 10, 2025**
Date Response Provided: **July 24, 2025**
Subject Area: **Rate Design**

DATA REQUEST:

2. Regarding the rate design parameters found in Attachment 1 from “Pourtaherian, Bahman Direct Testimony CAW 2025 GRC Final App” and workpaper “All_CH10_RD_RO”, in workable Excel format, for each district please compare the to-date 2025 average monthly bill for residential customers (5/8" meter size) under current rates and fixed cost recovery to the calculated average under proposed rates and fixed cost recovery. Please include all supporting calculations and links to or copies of supporting workpapers to explain how the calculations were made. See format example below:

	Proposed At Current	Proposed TY 2024
Volumetric rates differential	15%	25%
Fixed Cost Recovery	30%	50%
Service Charge	\$ 26.30	\$ 43.84
Commodity Charge	\$ 4.73	\$ 3.30
Total Commodity Charge * CCF	\$ 55.93	\$ 39.05
Monthly Bill*	\$ 82.23	\$ 82.89
(\$ Increase		\$0.66
(%) Increase		0.80%
CAP Surcharge	\$5.74	\$4.19

California-American Water Company

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

Total Monthly Bill w/CAP charge	\$87.97	\$87.08
(\$ Increase		(\$0.89)
(%) Increase		-1.02%
*Based on a residential customer with 5/8 x 3/4" meter size		
using 11.83 Ccf of water. Excludes applicable surcharges and PUC fees.		

CAL-AM'S RESPONSE

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request on the grounds it 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 as vague and ambiguous, particularly with respect to the terms "volumetric rates differential," "fixed cost recovery" and "average monthly bill". Subject to, but without waiving, those objections, California American Water responds as follows.

Please see CAW Response Cal Adv HMC 01 Q002 Attachment 1 - Monthly Bills Average.

California American Water's authorized and proposed rate designs differ across tariffed service areas. In some cases, service charges are calculated based on fixed cost recovery, while in others they reflect a portion of the total revenue requirement. To maintain consistency, all service charges have been normalized to reflect the percentage of the total revenue requirement recovered through meter charges.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
55 Drohan Dr.
Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-01**
Company Number: **Cal Adv HMC-01 Q003**
Date Received: **July 10, 2025**
Date Response Provided: **July 24, 2025**
Subject Area: **Rate Design**

DATA REQUEST:

3. Regarding the rate design parameters found in Attachment 1 from “Pourtaherian, Bahman Direct Testimony CAW 2025 GRC Final App” and workpaper “All_CH10_RD_RO”, in workable Excel format, for each district please compare the to-date 2025 average monthly bill for Customer Assistance Program (“CAP”) customers (5/8" meter size) under current rates and fixed cost recovery to the calculated average under proposed rates and fixed cost recovery. Please include all supporting calculations and links to or copies of supporting workpapers to explain how the calculations were made. See format example below:

California-American Water Company

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

	Proposed At Current	Proposed TY 2024
Volumetric rates differential	15%	25%
Fixed Cost Recovery	30%	50%
Service Charge	\$ 26.30	\$ 43.84
Commodity Charge	\$ 4.73	\$ 3.30
Total Commodity Charge * CCF	\$ 55.93	\$ 39.05
Monthly Bill*	\$ 82.23	\$ 82.89
(\$ Increase		\$ 0.66
(%) Increase		0.80%
Discount	(\$8.17)	(\$10.00)
Total CAP Monthly Bill	\$74.06	\$72.89
(\$ Increase		(\$1.17)
(%) Increase		-1.58%

*Based on a residential customer with 5/8 x 3/4" meter size
 using 11.83 Ccf of water. Excludes applicable surcharges and PUC fees.

CAL-AM'S RESPONSE

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request on the grounds it 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 as vague and ambiguous, particularly with respect to the terms "volumetric rates differential," "fixed cost recovery" and "average monthly bill". Subject to, but without waiving, those objections, California American Water responds as follows.

Please see CAW Response Cal Adv HMC 01 Q003 Attachment 1 – Monthly Bills CAP.

California American Water's authorized and proposed rate designs differ across tariffed service areas. In some cases, service charges are calculated based on fixed cost recovery, while in others they reflect a portion of the total revenue requirement. To maintain consistency, all service charges have been normalized to reflect the percentage of the total revenue requirement recovered through meter charges.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
55 Drohan Dr.
Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-01**
Company Number: **Cal Adv HMC-01 Q004**
Date Received: **July 10, 2025**
Date Response Provided: **July 24, 2025**
Subject Area: **Rate Design**

DATA REQUEST:

4. Regarding the rate design parameters found in Attachment 1 from “Pourtaherian, Bahman Direct Testimony CAW 2025 GRC Final App” and workpaper “All_CH10_RD_RO”, for each district, please compare in a workable Excel format, a 2025 average monthly bill for non-CAP customers (5/8" meter size) under the current rates and fixed cost recovery to a 2025 average monthly bill for non-CAP customers under the proposed rates and fixed cost recovery. Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all documents if necessary. See format from question 2.

CAL-AM'S RESPONSE

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request on the grounds it 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 as vague and ambiguous, particularly with respect to the terms “volumetric rates differential,” “fixed cost recovery” and “average monthly bill”. Subject to, but without waiving, those objections, California American Water responds as follows.

Please see CAW Response Cal Adv HMC 01 Q004 Attachment 1 – Monthly Bills NonCAP.

California-American Water Company

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

California American Water's authorized and proposed rate designs differ across tariffed service areas. In some cases, service charges are calculated based on fixed cost recovery, while in others they reflect a portion of the total revenue requirement. To maintain consistency, all service charges have been normalized to reflect the percentage of the total revenue requirement recovered through meter charges.

California-American Water Company

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

Response Provided By: Kristina Remelius
Title: Project Manager Operations
Address: California American Water
655 West Broadway #1410
San Diego
Cal Adv Request: A2507003 Public Advocates DR HMC-01
Company Number: Cal Adv HMC-01 Q005
Date Received: July 10, 2025
Date Response Provided: July 24, 2025
Subject Area: Rate Design

DATA REQUEST:

5. Regarding historical rate design parameters similar to those found in Attachment 1 from "Pourtaherian, Bahman Direct Testimony CAW 2025 GRC Final App" and workpaper "All_CH10_RD_RO", in workable Excel format (one Excel file per district), please provide the average monthly bill for residential customers, by district, for the last three recorded years (2022 - 2024). See format example below:

Effective Date (Year End)	5/8 x 3/4 Inch Meter Service Charge	Tier 1		Tier 2		Tier 3		Tier 4		Average Consumption per Month (CCF)	Monthly Charges		Monthly Charges				Total Monthly Bill (with Surcharges & Surcredits)	
		Tier (CCF)	Per CCF	Tier (CC F)	Per CCF	Tier (CC F)	Per CCF	Tier (CC F)	Per CCF		Nominal	Escalated To 2025 Dollars	Non-CAP (i.e., WRAM/MCB A) (per CCF)	CAP per acct	Surcredits per acct	PUC User Fee	Nominal	Escalated To 2025 Dollars
2022	\$14.38	0-10	\$2.93	10+	\$3.21		\$0.00		\$0.00	12.1	\$50	\$60	\$0.00	\$4.50	\$0.00	1.50%	\$56	\$66
2023	\$16.01	0-12	\$3.13	12+	\$3.60		\$0.00		\$0.00	11.3	\$51	\$60	\$1.98	\$0.00	\$0.00	1.50%	\$54	\$63
2024	\$16.01		\$3.19		\$3.66		\$0.00		\$0.00	11.3	\$52	\$61	\$2.59	\$0.00	(\$2.94)	1.50%	\$52	\$61

CAL-AM'S RESPONSE

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request on the grounds it seeks an analysis, calculation, or compilation that has not previously been performed and is therefore unduly burdensome. California American Water also objects to this request on the grounds that it would be unduly burdensome and expensive to provide the data requested in the format requested. California American Water additionally objects to this request on the grounds it is vague, ambiguous, and

California-American Water Company

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

overbroad, particularly with respect to the term “2025 Dollars”. Subject to, but without waiving, those objections, California American Water responds as follows.

Data is provided for the last 3 years (2022-2024), based on the last day of each year.

Both the “Non-CAP (per CCF)” and “Sur-credits per Acct” columns include a combination of Surcharges and Surcredits that are: flat rate, volume based and/or percentage based.

Please see the following individual Excel files by district:

- CAW Response Cal Adv HMC 01 Q005 Attachment 01
- CAW Response Cal Adv HMC 01 Q005 Attachment 02
- CAW Response Cal Adv HMC 01 Q005 Attachment 03
- CAW Response Cal Adv HMC 01 Q005 Attachment 04
- CAW Response Cal Adv HMC 01 Q005 Attachment 05
- CAW Response Cal Adv HMC 01 Q005 Attachment 06
- CAW Response Cal Adv HMC 01 Q005 Attachment 07
- CAW Response Cal Adv HMC 01 Q005 Attachment 08
- CAW Response Cal Adv HMC 01 Q005 Attachment 09
- CAW Response Cal Adv HMC 01 Q005 Attachment 10
- CAW Response Cal Adv HMC 01 Q005 Attachment 11
- CAW Response Cal Adv HMC 01 Q005 Attachment 12
- CAW Response Cal Adv HMC 01 Q005 Attachment 13

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
55 Drohan Dr.
Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-01**
Company Number: **Cal Adv HMC-01 Q006**
Date Received: **July 10, 2025**
Date Response Provided: **July 24, 2025**
Subject Area: **Rate Design**

DATA REQUEST:

6. Regarding the Standard Quantity Rates (SQR's) found in Attachment 1 from "Pourtaherian, Bahman Direct Testimony CAW 2025 GRC Final App" and workpaper "All_CH10_RD_RO", what are the SQR's under Conservation Rates per CCF for each rate making area under the CART proposal? Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all source documents.

CAL-AM'S RESPONSE

As outlined in Q21 in Bahman Pourtaherian's Direct Testimony, a separate sales forecast was developed specifically for the CART proposal. Because the sales forecast affects total revenue requirements through changes in production costs, California American Water prepared a distinct RO model to calculate the corresponding revenue requirements and rate design for the CART proposal. California American Water will provide a link to this CONFIDENTIAL and distinct RO model.

California-American Water Company

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

Response Provided By: **Bahman Pourtaherian**
Title: **Principal Consultant**
Address: **Blue Planet Utility Consulting**
55 Drohan Dr.
Guelph, Ontario, Canada
Cal Adv Request: **A2507003 Public Advocates DR HMC-01**
Company Number: **Cal Adv HMC-01 Q007**
Date Received: **July 10, 2025**
Date Response Provided: **July 24, 2025**
Subject Area: **Rate Design**

DATA REQUEST:

7. Regarding the rate design cost of service as found in tab “Cost of Service WS-02”, cells “R111” and “S111” of workpaper “All_CH10_RD_RO”, is the amount of \$4.275 the PURE Water Monterey Charge? If so, please provide documentation confirming the amount. If not, what is this charge? Please explain and/or support with workpapers, an electronic Excel spreadsheet of calculations, including links, and all documents.

CAL-AM'S RESPONSE

That is correct, \$4.275 is the SQR associated with Pure Water Monterey. For the detail information regarding Pure Water Monterey cost, including water right and cost per AF, please refer to worksheet “CEN” in workpaper “ALL_CH04_O&M_WP_Purchased Power”. Please refer to CAW Response Cal Adv HMC-01 Q007 Attachment 1, for the supporting documents for the Pure Water Monterey rate.

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

Response Provided By: Chase Grady
Title: Rates & Regulatory Analyst
Address: California American Water
520 Capitol Mall, Suite 630
Sacramento
Cal Adv Request: A2507003 Public Advocates DR HMC-01
Company Number: Cal Adv HMC-01 Q008
Date Received: July 10, 2025
Date Response Provided: July 24, 2025
Subject Area: Rate Design

DATA REQUEST:

8. Regarding the CAP as found in "Pilz, Patrick Direct Testimony CAW 2025 GRC Final App", for the CAP, please provide the information below, per district, for the years 2022 through 2025 (for 2025, please provide per month up to the most recent month of recorded data for 2025). Please use Excel format and include all calculations and links to supporting documents.

a. CAP annual enrollment (number of participants). See format example below:

District	2022	2023	2024	2025
Sacramento	7,473	7,475	...	
Larkfield	160	165	...	

b. CAP annual enrollment rates. See format example below:

District	2022	2023	2024	2025
Sacramento	12.33%	12.26%	...	
Larkfield	6.75%	6.74%	...	

c. CAP surcharge history. See format example below:

Year	CAP Surcharge
2022	\$1.30
2023	...
2024	...
2025	...

d. CAP service charge discount history. See format example below:

California-American Water Company

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

Year	CAP Discount
2022	20% off of the meter charge and tiers one and two of the commodity charge for all service areas except Monterey. For Monterey, 30% off of the meter charge and tiers one, two, and three of the commodity charge.
2023	...
2024	...
2025	...

CAL-AM'S RESPONSE

- a. For questions 8 a. and b. please see:
CAW Response Cal Adv HMC-01 Q008.a-b Attachment 1 - CAP 2022-2025
- b. See part a. above.
- c. CAP surcharge history:

Year	CAP Surcharge
2022	\$1.30
2023	\$1.59
2024	\$1.77
2025	\$3.15

California-American Water Company

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

d. CAP service charge discount history:

Year	CAP Discount
2022	20% off of the meter charge and tiers one and two of the commodity charge for all service areas except Monterey. For Monterey, 30% off of the meter charge and tiers one, two, and three of the commodity charge. For Monterey Active Wastewater, 35% off of the monthly service charge.
2023	20% off of the meter charge and tiers one and two of the commodity charge for all service areas except Monterey. For Monterey, 30% off of the meter charge and tiers one, two, and three of the commodity charge. For Monterey Active Wastewater, 35% off of the monthly service charge.
2024	20% off of the meter charge and tiers one and two of the commodity charge for all service areas except Monterey. For Monterey, 30% off of the meter charge and tiers one, two, and three of the commodity charge. For Monterey Active Wastewater, 35% off of the monthly service charge.
2025	25% off of the meter charge and tiers one and two of the commodity charge for all service areas except Monterey. For Monterey, 35% off of the meter charge and tiers one, two, and three of the commodity charge. For Monterey Active Wastewater, 35% off of the monthly service charge.

California-American Water Company

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

Response Provided By: James Kelly
Title: Senior Principal Regulatory Analyst
Address: California American Water
520 Capitol Mall, Suite 630
Sacramento
Cal Adv Request: A2507003 Public Advocates DR HMC-01
Company Number: Cal Adv HMC-01 Q009.a-b
Date Received: July 10, 2025
Date Response Provided: July 24, 2025
Subject Area: Rate Design

DATA REQUEST:

9. Also, regarding the CAP as found in “Pilz, Patrick Direct Testimony CAW 2025 GRC Final App”, for the CAP, please provide the information below, per district, for the years 2020 through 2024. Please use Excel format and include all calculations and links to supporting documents.

a. Monthly average CAP consumption vs. non-CAP consumption in CCF. See format example below:

District	2020	2021	2022	2023	2024
Sacramento	11.10	11.83
Larkfield	7.53	7.69

District	2020	2021	2022	2023	2024
Sacramento	11.92	13.55
Larkfield	6.98	7.50

b. Total CAP consumption. See format example below:

District	2020	2021	2022	2023	2024
Sacramento	179,140	179,564
Larkfield	114,554	108,543

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 on the grounds it seeks an analysis, calculation, or compilation that has not previously been performed and is therefore unduly burdensome. California American Water also objects to this request on the grounds that it would be unduly burdensome and expensive to provide the data requested in the format requested. Subject to, but without waiving, those objections, California American Water responds as follows.

Average CAP consumption vs. non-CAP consumption and total CAP consumption in CCF billing data is provided by district for the years 2020 to 2024. Please see CAW Response Cal Adv HMC-001 Q009a-b Attachment 1 - CAP Non-CAP.

California-American Water Company

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

Response Provided By: Kristina Remelius
Title: Project Manager Operations
Address: California American Water
655 West Broadway #1410
San Diego
Cal Adv Request: A2507003 Public Advocates DR HMC-01
Company Number: Cal Adv HMC-01 Q009
Date Received: July 10, 2025
Date Response Provided: July 24, 2025
Subject Area: Rate Design

DATA REQUEST:

9. Also, regarding the CAP as found in "Pilz, Patrick Direct Testimony CAW 2025 GRC Final App", for the CAP, please provide the information below, per district, for the years 2020 through 2024. Please use Excel format and include all calculations and links to supporting documents.

- c. Average residential (5/8" x 3/4") monthly customer bills, CAP/non-CAP. (In format of questions 3 and 4)
- d. Percent change of monthly residential (5/8" x 3/4") customer bill, CAP/non-CAP. See format example below:

2020	Sacramento	Larkfield
Average Cal Am Non-CAP Bill	\$ 32.31	\$ 52.04
Average Cal Non-CAP Bill	\$ 42.07	\$ 63.97
% Change	-23%	-19%

- e. Percentage of average monthly residential bill comprised of surcharges, CAP/non-CAP. See format example below:

2020	Sacramento	Larkfield
Average Cal Am Non-CAP Bill	0.929%	0.000%
Average Cal Non-CAP Bill	0.943%	0.151%

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 on the grounds it seeks an analysis, calculation, or compilation that has not previously been performed and is therefore unduly burdensome. California American Water also objects to this request on the grounds that it would be unduly burdensome and expensive to provide the data requested in the format requested. California American Water also objects to this request on the grounds it seeks information that is already publicly available or that is equally available to Cal PA. Subject to, but without waiving, those objections, California American Water responds as follows.

Data is provided for months and years November 2022 through November 2024 of the California American Water's Water Summary, Cost and Rate Tracker submitted quarterly to the CPUC per D.22-08-023.

Please see the following zip file attachments:

- CAW Response Cal Adv HMC-01 Q009 c-e Attachment 01
- CAW Response Cal Adv HMC-01 Q009 c-e Attachment 02
- CAW Response Cal Adv HMC-01 Q009 c-e Attachment 03
- CAW Response Cal Adv HMC-01 Q009 c-e Attachment 04
- CAW Response Cal Adv HMC-01 Q009 c-e Attachment 05
- CAW Response Cal Adv HMC-01 Q009 c-e Attachment 06
- CAW Response Cal Adv HMC-01 Q009 c-e Attachment 07
- CAW Response Cal Adv HMC-01 Q009 c-e Attachment 08
- CAW Response Cal Adv HMC-01 Q009 c-e Attachment 09

Attachment 2-3: Cal Am Response to Cal Advocates' TY 2027 Data Request HMC-05

(Excel attachments referenced in Cal Am's response are not attached due to file size but available upon request)

**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.

Application 25-07-003
(Filed July 1, 2025)

**CALIFORNIA-AMERICAN WATER COMPANY'S RESPONSE TO
PUBLIC ADVOCATES OFFICE'S DATA REQUEST HMC-05**

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

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Alex Van Roekel
Nossaman LLP
50 California Street
34th Floor
San Francisco, CA 94111
(415) 398-3600
ldolqueist@nossaman.com

Attorneys for California-American Water Company

Dated: October 17, 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 HMC-05 (“Data Requests” or “RPD”), propounded on October 3, 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: Kristina Remelius
Title: Project Manager Operations
Address: California American Water
520 Capitol Mall, Suite 630
Sacramento
Cal Adv Request: A2507003 Public Advocates DR HMC-05
Company Number: Cal Adv HMC-05 Q001
Date Received: October 3, 2025
Date Response Provided: October 17, 2025
Subject Area: Rate Design

DATA REQUEST:

1. Regarding the percentage of proposed usage found in Attachment 1 from "Pourtaherian, Bahman Direct Testimony CAW 2025 GRC Final App" and workpaper "All_CH10_RD_RO," please provide the Monterey Multi-Family premise dwelling unit data for the 12-month period July 2024 through June 2025 associated with the customer unique identifier (so that unit data matches the correct customer consumption) provided in tab "MULTI FAMILY" of data request HMC-01 response workpaper "CAW Response Cal Adv HMC-01 Q001 Attachment 02 – 1540." See format example below:

CAL-AM'S RESPONSE

Please see attachment CAW Response Cal Adv HMC-05 Q001 Attachment 01.

Attachment 2-4: Tier Breakpoints/Consumption Ratios TY 2027

Sacramento Tier Breakpoints and Consumption Ratios

Tiers	Cal Advocates Recommended	Cal Adv Actual Consumption Ratio	Cal Am Requested	Cal Am Requested Consumption Ratio
1	0 to 6 Ccf	47.1%	0 to 10 Ccf	65.9%
2	7 to 18 Ccf	35.9%	11 to 20 Ccf	20.1%
3	Over 18 Ccf	17.0%	Over 20 Ccf	14.0%

Larkfield Tier Breakpoints and Consumption Ratios

Tier s	Cal Advocates Recommended	Cal Adv Actual Consumption Ratio	Cal Am Requested	Cal Am Requested Consumption Ratio
1	0 to 5 Ccf	48.4%	0 to 5 Ccf	47.2%
2	6 to 18 Ccf	39.1%	6 to 18 Ccf	40.2%
3	Over 18 Ccf	12.5%	19 to 25 Ccf	5.8%
4			Over 25 Ccf	6.9%

Meadowbrook Tier Breakpoints and Consumption Ratios

Tiers	Cal Advocates Recommended	Cal Adv Actual Consumption Ratio	Cal Am Requested	Cal Am Requested Consumption Ratio
1	0 to 6 Ccf	35.1%	0 to 11 Ccf	56.9%
2	7 to 28 Ccf	49.7%	12 to 20 Ccf	21.0%
3	Over 28 Ccf	15.2%	Over 20 Ccf	22.1%

Monterey Single Family Tier Breakpoints and Consumption Ratios

Tiers	Cal Advocates Recommended	Cal Adv Actual Consumption Ratio	Cal Am Requested	Cal Am Requested Consumption Ratio
1	0 to 4 Ccf	62.0%	0 to 4 Ccf	63.2%
2	5 to 8 Ccf	20.96%	5 to 8 Ccf	21.3%
3	9 to 15 Ccf	9.56%	9 to 15 Ccf	9.0%
4	Over 15 Ccf	7.47%	Over 15 Ccf	6.5%

Monterey Multi-Family Tier Breakpoints and Consumption Ratios

Tiers	Cal Advocates Recommended	Cal Adv Actual Consumption Ratio	Cal Am Requested	Cal Am Requested Consumption Ratio
1	0 to 3 Ccf	70.5%	0 to 3 Ccf	71.6%
2	4 to 5 Ccf	14.11%	4 to 5 Ccf	22.8%
3	6 to 7 Ccf	4.96%	6 to 7 Ccf	2.8%
4	Over 7 Ccf	10.41%	Over 7 Ccf	2.8%

Central Satellites Tier Breakpoints and Consumption Ratios

Tiers	Cal Advocates Recommended	Cal Adv Actual Consumption Ratio	Cal Am Requested	Cal Am Requested Consumption Ratio
1	0 to 6 Ccf	42.1%	0 to 8 Ccf	55.2%
2	7 to 25 Ccf	39.0%	9 to 18 Ccf	22.2%
3	Over 25 Ccf	18.9%	19 to 44 Ccf	16.1%
4			Over 44 Ccf	6.5%

Southern Division Tier Breakpoints and Consumption Ratios

Tiers	Cal Advocates Recommended	Cal Adv Actual Consumption Ratio	Cal Am Requested	Cal Am Requested Consumption Ratio
1	0 to 6 Ccf	40.6%	0 to 11 Ccf	64.9%
2	7 to 23 Ccf	41.7%	12 to 18 Ccf	13.9%
3	Over 23 Ccf	17.6%	19 to 40 Ccf	13.5%
4			Over 40 Ccf	7.6%

Southern Acquisition Tier Breakpoints and Consumption Ratios

Tiers	Cal Advocates Recommended	Cal Adv Actual Consumption Ratio	Cal Am Requested	Cal Am Requested Consumption Ratio
1	0 to 6 Ccf	43.1%	0 to 11 Ccf	67.6%
2	7 to 23 Ccf	42.8%	12 to 18 Ccf	14.2%
3	Over 23 Ccf	14.0%	19 to 40 Ccf	12.0%
4			Over 40 Ccf	6.3%

Attachment 2-5: Cal Am's Requested Rate Design for the Northern Division but Using the Actual Water Consumption Patterns of the Last Recorded Twelve Months (July 2024 to June 2025) for Test Year 2027

Sacramento Requested (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-10	65.9%	\$3.8965	\$2.5348
Tier 2	11-20	20.1%	\$5.8816	\$1.2014
Tier 3	>20	14.0%	\$6.8227	\$0.9907
TOTAL				\$4.7269
SQR				\$4.7053

Larkfield Requested (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-5	48.4%	\$5.8679	\$2.8375
Tier 2	6-18	39.1%	\$6.1124	\$2.3911
Tier 3	19-25	5.4%	\$6.7848	\$0.3696
Tier 4	>25	7.0%	\$7.2310	\$0.5096
TOTAL				\$6.1077
SQR				\$6.1124

Meadowbrook Requested (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-11	55.6%	\$2.0959	\$1.1651
Tier 2	12-20	20.6%	\$2.8116	\$0.5803
Tier 3	>20	23.8%	\$3.4971	\$0.8313
TOTAL				\$2.5767
SQR				\$2.5560

**Attachment 2-6: Northern Division
Recommended Rate Designs Using Cal Am's
Proposed SQR and Actual Water
Consumption Patterns of the Last Recorded
Twelve Months (July 2024 to June 2025) TY
2027**

Cal Advocates Recommended for Sacramento (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	47.1%	\$3.5290	\$1.6627
Tier 2	7-18	35.9%	\$4.7053	\$1.6896
Tier 3	>18	17.0%	\$7.9702	\$1.3530
TOTAL			\$4.7053	
		SQR		\$4.7053

Cal Advocates Recommended for Larkfield (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-5	48.4%	\$5.5012	\$2.6601
Tier 2	6-18	39.1%	\$6.1124	\$2.3911
Tier 3	>18	12.5%	\$8.4722	\$1.0612
TOTAL			\$6.1124	
		SQR		\$6.1124

Cal Advocates Recommended for Meadowbrook (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	35.1%	\$1.6614	\$0.5826
Tier 2	7-28	49.7%	\$2.5560	\$1.2709
Tier 3	>28	15.2%	\$4.6184	\$0.7025
TOTAL			\$2.5560	
		SQR		\$2.5560

**Attachment 2-7: Northern Division
Recommended Rate Designs Using
Recommended Revenue Requirement and
Actual Water Consumption Patterns of the
Last Recorded Twelve Months (July 2024 to
June 2025) TY 2027**

Cal Advocates Recommended for Sacramento

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	47.1%	\$2.9944	\$1.4108
Tier 2	7-18	35.9%	\$3.9925	\$1.4336
Tier 3	>18	17.0%	\$6.7628	\$1.1480
TOTAL				\$3.9925
			SQR	\$3.9925

Cal Advocates Recommended for Larkfield

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-5	48.4%	\$5.4554	\$2.6380
Tier 2	6-18	39.1%	\$6.0615	\$2.3712
Tier 3	>18	12.5%	\$8.4008	\$1.0522
TOTAL				\$6.0614
			SQR	\$6.0615

Cal Advocates Recommended for Meadowbrook

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	35.1%	\$1.4243	\$0.4995
Tier 2	7-28	49.7%	\$2.1913	\$1.0896
Tier 3	>28	15.2%	\$3.9594	\$0.6022
TOTAL				\$2.1913
			SQR	\$2.1913

Attachment 2-8: Cal Am's Requested Rate Design for the Central Division Using the Actual Water Consumption Patterns of the Last Recorded Twelve Months (July 2024 to June 2025) TY 2027

Monterey Single Family Requested (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-4	62.0%	\$6.9608	\$4.3163
Tier 2	5-8	21.0%	\$13.9216	\$2.9186
Tier 3	9-15	9.6%	\$20.8823	\$1.9956
Tier 4	>15	7.5%	\$29.0032	\$2.1665
			TOTAL	\$11.3970
			CCCBR	\$4.6405

Monterey Multi-Family Requested (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-3	70.5%	\$8.6609	\$6.1077
Tier 2	4-5	14.1%	\$17.3219	\$2.4442
Tier 3	6-7	5.0%	\$38.9742	\$1.9332
Tier 4	>7	10.4%	\$54.1308	\$5.6349
			TOTAL	\$16.1199
			CCCBR	\$8.6609

Central Satellites Requested (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-8	49.9%	\$8.1092	\$4.0470
Tier 2	9-18	23.0%	\$9.1115	\$2.0967
Tier 3	19-44	18.7%	\$10.9338	\$2.0407
Tier 4	>44	8.4%	\$13.1479	\$1.1069
			TOTAL	\$9.2912
			SQR	\$9.1115

**Attachment 2-9: Central Division
Recommended Rate Designs Using Cal Am's
Proposed CCCBR and SQR and Actual
Water Consumption Patterns of the Last
Recorded Twelve Months (July 2024 to June
2025) TY 2027**

Cal Advocates Recommended for Monterey Single Family (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-4	62.0%	\$3.7124	\$2.3020
Tier 2	5-15	30.5%	\$4.6405	\$1.4163
Tier 3	>15	7.5%	\$12.3448	\$0.9222
TOTAL			\$4.6405	
			CCCBR	\$4.6405

Cal Advocates Recommended for Monterey Multi-Family (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-3	70.5%	\$7.7948	\$5.4969
Tier 2	4-7	19.1%	\$8.6609	\$1.6517
Tier 3	>7	10.4%	\$14.5282	\$1.5123
TOTAL			\$8.6609	
			CCCBR	\$8.6609

Cal Advocates Recommended for Central Satellites (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	42.1%	\$6.8336	\$2.8740
Tier 2	7-25	39.0%	\$9.1115	\$3.5571
Tier 3	>25	18.9%	\$14.1792	\$2.6804
TOTAL			\$9.1115	
			SQR	\$9.1115

**Attachment 2-10: Central Division
Recommended Rate Designs Using
Recommended Revenue Requirement and
Actual Water Consumption Patterns of the
Last Recorded Twelve Months (July 2024 to
June 2025) TY 2027**

Cal Advocates Recommended for Monterey Single Family

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-4	62.0%	\$10.0650	\$6.2412
Tier 2	5-8	21.0%	\$12.5810	\$2.6375
Tier 3	9-15	9.6%	\$18.8720	\$1.8035
Tier 4	>15	7.5%	\$25.5400	\$1.9078
TOTAL				\$12.5900
				SQR \$12.5810

Cal Advocates Recommended for Monterey Multi-Family

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-3	70.5%	\$10.0650	\$7.0978
Tier 2	4-5	14.1%	\$12.5810	\$1.7752
Tier 3	6-7	5.0%	\$18.8720	\$0.9361
Tier 4	>7	10.4%	\$26.6720	\$2.7765
TOTAL				\$12.5856
				SQR \$12.5810

Cal Advocates Recommended for Central Satellites

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	42.1%	\$6.8168	\$2.8669
Tier 2	7-25	39.0%	\$9.0891	\$3.5483
Tier 3	>25	18.9%	\$14.1436	\$2.6737
TOTAL				\$9.0890
				SQR \$9.0891

**Attachment 2-11: Cal Am's Southern
Division Requested Rate Design Using Actual
Water Consumption Patterns of the Last
Recorded Twelve Months (July 2024 to June
2025) TY 2027**

Southern Division Requested (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-11	61.0%	\$5.1338	\$3.1340
Tier 2	12-18	15.4%	\$5.8592	\$0.9005
Tier 3	19-40	14.9%	\$6.4172	\$0.9552
Tier 4	>40	8.7%	\$7.3770	\$0.6411
			TOTAL	\$5.6309
			SQR	\$5.5802

San Diego Requested (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-11	61.0%	\$8.0143	\$4.8925
Tier 2	12-18	15.4%	\$9.1468	\$1.4058
Tier 3	19-40	14.9%	\$10.0179	\$1.4912
Tier 4	>40	8.7%	\$11.5163	\$1.0008
			TOTAL	\$8.7904
			SQR	\$8.7112

Ventura Requested (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-11	61.0%	\$6.3462	\$3.8741
Tier 2	12-18	15.4%	\$7.2429	\$1.1132
Tier 3	19-40	14.9%	\$7.9328	\$1.1808
Tier 4	>40	8.7%	\$9.1192	\$0.7925
			TOTAL	\$6.9607
			SQR	\$6.8980

Southern Transition Requested (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-11	65.3%	\$3.5809	\$2.3367
Tier 2	12-18	15.4%	\$4.0000	\$0.6145
Tier 3	19-40	12.6%	\$4.3809	\$0.5533
Tier 4	>40	6.8%	\$4.7504	\$0.3209
			TOTAL	\$3.8253
			SQR	\$3.8095

**Attachment 2-12: Southern Division
Recommended Rate Designs Using Cal Am's
Proposed SQR and Actual Water
Consumption Patterns of the Last Recorded
Twelve Months (July 2024 to June 2025) TY
2027**

Cal Advocates Recommended for Southern Division (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	40.6%	\$4.1852	\$1.7010
Tier 2	7-23	41.7%	\$5.5802	\$2.3295
Tier 3	>23	17.6%	\$8.8001	\$1.5497
TOTAL			\$5.5802	
			SQR	\$5.5802

Cal Advocates Recommended for San Diego (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	40.6%	\$6.5334	\$2.6555
Tier 2	7-23	41.7%	\$8.7112	\$3.6365
Tier 3	>23	17.6%	\$13.7378	\$2.4192
TOTAL			\$8.7112	
			SQR	\$8.7112

Cal Advocates Recommended for Ventura (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	40.6%	\$5.1735	\$2.1028
Tier 2	7-23	41.7%	\$6.8980	\$2.8796
Tier 3	>23	17.6%	\$10.8783	\$1.9157
TOTAL			\$6.8980	
			SQR	\$6.8980

Cal Advocates Recommended for Southern Transition (using application amounts)

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	43.1%	\$2.8571	\$1.2325
Tier 2	7-23	42.8%	\$3.8095	\$1.6313
Tier 3	>23	14.0%	\$6.7352	\$0.9457
TOTAL			\$3.8095	
			SQR	\$3.8095

**Attachment 2-13: Southern Division
Recommended Rate Designs Using
Recommended Revenue Requirement and
Actual Water Consumption Patterns of the
Last Recorded Twelve Months (July 2024 to
June 2025) TY 2027**

Cal Advocates Recommended for Southern Division

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	40.6%	\$3.6517	\$1.4842
Tier 2	7-23	41.7%	\$4.8689	\$2.0325
Tier 3	>23	17.6%	\$7.6783	\$1.3521
TOTAL			\$4.8689	
			SQR	\$4.8689

Cal Advocates Recommended for San Diego

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	40.6%	\$5.9995	\$2.4385
Tier 2	7-23	41.7%	\$7.9993	\$3.3393
Tier 3	>23	17.6%	\$12.6150	\$2.2215
TOTAL			\$7.9993	
			SQR	\$7.9993

Cal Advocates Recommended for Ventura

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	40.6%	\$4.6402	\$1.8860
Tier 2	7-23	41.7%	\$6.1870	\$2.5828
Tier 3	>23	17.6%	\$9.7569	\$1.7182
TOTAL			\$6.1870	
			SQR	\$6.1870

Cal Advocates Recommended for Southern Transition

Tier	Breakpoints	% Usage	Rate	Portion
Tier 1	0-6	43.1%	\$2.5738	\$1.1102
Tier 2	7-23	42.8%	\$3.4317	\$1.4695
Tier 3	>23	14.0%	\$6.0673	\$0.8520
TOTAL			\$3.4317	
			SQR	\$3.4317

Attachment 2-14: Cal Am Response to Cal Advocates' TY 2024 Data Request HMC-01

(Excel attachments referenced in Cal Am's response are not attached due to file size but available upon request)

**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 \$55,771,300 or 18.71% in the year 2024, by \$19,565,300 or 5.50% in the year 2025, and by \$19,892,400 or 5.30% in the year 2026.

A.22-07-001
(Filed July 1, 2022)

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

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Cathy Hongola-Baptista
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Attorneys for California-American Water Company

Dated: August 2, 2022

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 HMC 01 (“Data Requests” or “RPD”), propounded on July 19, 2022, in A.22-07-001.

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.22-07-001
DATA REQUEST RESPONSE

Response Provided By: James Kelly
Title: Senior Manager Rates & Regulatory
Address: California American Water
520 Capital Mall, Suite 630
Sacramento, CA 95814
ORA Request: A2207001 CAL ADV DATA REQUEST # HMC-01
Company Number: Cal ADV HMC 01 Q001
Date Received: July 19, 2022
Date Response Due: August 2, 2022
Subject Area: Rate Design

DATA REQUEST:

1. In workable Excel format (one Excel file per district), please provide the monthly CCF consumption data for each of Cal Am's customers, by district, for the most recent 12- month period and the last four recorded years (2018, 2019, 2020, and 2021). Please provide a separate Excel Tab/Worksheet for each customer class (i.e., residential, commercial, etc.) with a row for each customer and columns for customer identifier, meter size, each month's consumption in CCF, 12-month total, 12-month average, summer average, and winter average. See format example below:

Example: 2018 file, “Residential” tab

Customer Identifier	Meter Size	Month 1	Month 2	Month 3	Month....	Total	Summer Average	Winter Average
#1	5/8in	7.55	8.12	7.87	...			
#2	3/4in	4.5	6	8.25	...			

CAL-AM'S RESPONSE

- California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request on the grounds it seeks an analysis, calculation, or compilation that has not previously been performed and is therefore unduly burdensome. California American Water also objects to this request on the grounds that it would be

California-American Water Company

APPLICATION NO. A.22-07-001
DATA REQUEST RESPONSE

unduly burdensome and expensive to provide the data requested in the format requested. California American Water additional objects to this request on the grounds it is vague, ambiguous, and overbroad, particularly with respect to the terms “summer average” and “winter average”. Subject to, but without waiving, those objections, California American Water responds as follows.

The folder Cal Adv HMC 01 Q001 Attachment 1 – Consumption CONFIDENTIAL includes files for years: 2018 to 2021 and 2022 (through June). Each annual file includes water consumption by district, customer and month. The files are segmented by Customer Class in separate worksheets.

Regarding the “Summer Average” and “Winter Average” columns, since no definition was provided, we used April - September to calculate the “Summer Average” and January to March plus October to December to calculate the “Winter Average.”

California American Water also includes annual meter count and size files by customer, for 2018 to 2022. The 2018-2021 files are as of Dec 31 and the 2022 file is as of June 30.

- Cal Adv HMC 01 Q001 Attachment 2 – Meters 2018 CONFIDENTIAL
- Cal Adv HMC 01 Q001 Attachment 3 – Meters 2019 CONFIDENTIAL
- Cal Adv HMC 01 Q001 Attachment 4 – Meters 2020 CONFIDENTIAL
- Cal Adv HMC 01 Q001 Attachment 5 – Meters 2021 CONFIDENTIAL
- Cal Adv HMC 01 Q001 Attachment 6 – Meters 2022 CONFIDENTIAL

California-American Water Company

APPLICATION NO. A.22-07-001
DATA REQUEST RESPONSE

Response Provided By: Jonathan Morse
Title: Senior Manager Rates & Regulatory
Address: California American Water
520 Capital Mall, Suite 630
Sacramento, CA 95814
ORA Request: A2207001 CAL ADV DATA REQUEST # HMC-01
Company Number: Cal ADV HMC 01 Q002
Date Received: July 19, 2022
Date Response Due: August 2, 2022
Subject Area: Rate Design

DATA REQUEST:

2. In workable Excel format, for each district please compare the to-date 2022 average monthly bill for residential customers (5/8" meter size) under current rates and fixed cost recovery to the calculated average under proposed rates and fixed cost recovery. Please include all supporting calculations and links to or copies of supporting workpapers to explain how the calculations were made. See format example below:

	At Current	Proposed TY 2024
Volumetric rates differential	15%	25%
Fixed Cost Recovery	30%	50%
Service Charge	\$26.30	\$43.84
Commodity Charge	\$ 4.73	\$ 3.30
Total Commodity Charge * CCF	\$55.93	\$39.05
Monthly Bill*	\$82.23	\$82.89
(\$ Increase		\$0.66
(%) Increase		0.80%
CAP Surcharge	\$5.74	\$4.19
Total Monthly Bill w/CAP charge	\$87.97	\$87.08
(\$ Increase		(\$0.89)
(%) Increase		-1.02%

California-American Water Company

APPLICATION NO. A.22-07-001
DATA REQUEST RESPONSE

*Based on a residential customer with 5/8 x 3/4" meter size		
using 11.83 Ccf of water. Excludes applicable surcharges and PUC fees.		

CAL-AM'S RESPONSE

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request on the grounds it 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 as vague and ambiguous, particularly with respect to the terms "volumetric rates differential," "fixed cost recovery" and "average monthly bill". Subject to, but without waiving, those objections, California American Water responds as follows.

Please see Cal Adv HMC 01 Q002 – Attachment 1 – Monthly Bills Non-CAP.

California American Water's authorized and proposed rate designs vary by tariffed service area. In some instances the service charge is based on a percentage of fixed cost recovery and in some instances it is based on a percentage of total revenue requirement recovery. As used in Cal Adv HMC 01 Q002 – Attachment 1 – Monthly Bills Non-CAP the current authorized rate design, "fixed cost recovery" means the percentage of the fixed cost that is recovered through meter charges, and "revenue requirement recovery" means the percentage of the revenue requirement that is recovered from meter charges.

California-American Water Company

APPLICATION NO. A.22-07-001
DATA REQUEST RESPONSE

Response Provided By: Jonathan Morse
Title: Senior Manager Rates & Regulatory
Address: California American Water
520 Capital Mall, Suite 630
Sacramento, CA 95814
ORA Request: A2207001 CAL ADV DATA REQUEST # HMC-01
Company Number: Cal ADV HMC 01 Q003
Date Received: July 19, 2022
Date Response Due: August 2, 2022
Subject Area: Rate Design

DATA REQUEST:

3. In workable Excel format, for each district please compare the to-date 2022 average monthly bill for Customer Assistance Program ("CAP") customers (5/8" meter size) under current rates and fixed cost recovery to the calculated average under proposed rates and fixed cost recovery. Please include all supporting calculations and links to or copies of supporting workpapers to explain how the calculations were made. See format example below:

	At Current	Proposed TY 2024
Volumetric rates differential	15%	25%
Fixed Cost Recovery	30%	50%
Service Charge	\$26.30	\$43.84
Commodity Charge	\$ 4.73	\$3.30
Total Commodity Charge * CCF	\$55.93	\$39.05
Monthly Bill*	\$ 82. 23	\$82.89
(\$) Increase		\$0.66
(%) Increase		0.80%
Discount	(\$8.17)	(\$10.00)
Total CAP Monthly Bill	\$74.06	\$72.89
(\$)		(\$1.17)

California-American Water Company

APPLICATION NO. A.22-07-001
DATA REQUEST RESPONSE

(%) Increase				-1.58%
*Based on a residential customer with 5/8 x 3/4" meter size using 11.83 Ccf of water. Excludes applicable surcharges and PUC fees.				

CAL-AM'S RESPONSE

California American Water incorporates its General Objections as though each is submitted fully here. California American Water further objects to this request on the grounds it 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 as vague and ambiguous, particularly with respect to the terms "volumetric rates differential," "fixed cost recovery" and "average monthly bill". Subject to, but without waiving, those objections, California American Water responds as follows.

Please see Cal Adv HMC 01 Q003 – Attachment 1 – Monthly Bills CAP.

California American Water's authorized and proposed rate designs vary by tariffed service area. In some instances the service charge is based on a percentage of fixed cost recovery and in some instances it is based on a percentage of total revenue requirement recovery. As used in Cal Adv HMC 01 Q003 – Attachment 1 – Monthly Bills CAP the current authorized rate design, "fixed cost recovery" means the percentage of the fixed cost that is recovered through meter charges, and "revenue requirement recovery" means the percentage of the revenue requirement that is recovered from meter charges.

California-American Water Company

APPLICATION NO. A.22-07-001
DATA REQUEST RESPONSE

Response Provided By:	James Kelly
Title:	Senior Manager Rates & Regulatory
Address:	California American Water 520 Capital Mall, Suite 630 Sacramento, CA 95814
ORA Request:	A2207001 CAL ADV DATA REQUEST # HMC-01
Company Number:	Cal ADV HMC 01 Q004.a-b
Date Received:	July 19, 2022
Date Response Due:	August 2, 2022
Subject Area:	Rate Design

DATA REQUEST:

4. For the CAP, please provide the information below, per district, for the years 2010 through 2022 (for 2022, please provide per month up to the most recent month of recorded data for 2022). Please use Excel format and include all calculations and links to supporting documents.

- a. CAP annual enrollment (number of participants)
- b. CAP annual enrollment rates

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 some of the data sought is not reasonably accessible and it would be unduly burdensome and expensive to provide. California American Water also objects to this request on the grounds it seeks information irrelevant to this proceeding and because it seeks information that is publicly available or that is equally available to Cal PA. Subject to, but without waiving, those objections, California American Water responds as follows.

CAP data is reasonably accessible from 2014 to current (June 2022). For Questions 4.a and 4.b see the following attachments:

- Cal Adv HMC 01 Q004.a-b Attachment 1 - CAP 2014

California-American Water Company

APPLICATION NO. A.22-07-001
DATA REQUEST RESPONSE

- Cal Adv HMC 01 Q004.a-b Attachment 2 - CAP 2015
- Cal Adv HMC 01 Q004.a-b Attachment 3 - CAP 2016
- Cal Adv HMC 01 Q004.a-b Attachment 4 - CAP 2017
- Cal Adv HMC 01 Q004.a-b Attachment 5 - CAP 2018
- Cal Adv HMC 01 Q004.a-b Attachment 6 - CAP 2019
- Cal Adv HMC 01 Q004.a-b Attachment 7 - CAP 2020
- Cal Adv HMC 01 Q004.a-b Attachment 8 - CAP 2021
- Cal Adv HMC 01 Q004.a-b Attachment 9 - CAP 2022

California-American Water Company

APPLICATION NO. A.22-07-001
DATA REQUEST RESPONSE

Response Provided By:	Jonathan Morse
Title:	Senior Manager Rates & Regulatory
Address:	California American Water 520 Capital Mall, Suite 630 Sacramento, CA 95814
ORA Request:	A2207001 CAL ADV DATA REQUEST # HMC-01
Company Number:	Cal ADV HMC 01 Q004.c-d
Date Received:	July 19, 2022
Date Response Due:	August 2, 2022
Subject Area:	Rate Design

DATA REQUEST:

4. For the CAP, please provide the information below, per district, for the years 2010 through 2022 (for 2022, please provide per month up to the most recent month of recorded data for 2022). Please use Excel format and include all calculations and links to supporting documents.

- c. CAP surcharge history
- d. CAP service charge discount history

CAL-AM'S RESPONSE

California American Water incorporates its General Objections as though each is submitted fully here. California American Water also objects to this request on the grounds it seeks information irrelevant to this proceeding and because it seeks information that is publicly available or that is equally available to Cal PA. California American Water additionally objects to this request on the grounds that some of the data sought is not reasonably accessible and it would be unduly burdensome and expensive to provide. Subject to, but without waiving, those objections, California American Water responds as follows.

CAP data is reasonably accessible from 2014 to current (June 2022). Surcharges are end of calendar year for 2014-2021 and current for 2022. See table below.

California-American Water Company

APPLICATION NO. A.22-07-001
DATA REQUEST RESPONSE

Year	CAP Surcharge
2014	0.00
2015	1.54
2016	1.86
2017	1.21
2018	1.21
2019	1.81
2020	1.81
2021	1.81
2022	1.30

CAP data is reasonably accessible from 2014 to current (June 2022). Discounts are end of calendar year for 2014-2021 and current for 2022. See table below.

Year	CAP Discount
2014	\$10.00 off
2015-2021	20% off of the meter charge and tiers one and two of the commodity charge for all service areas except Monterey. For Monterey, 30% off of the meter charge and tiers one, two, three, and four of the commodity charge.
2022	20% off of the meter charge and tiers one and two of the commodity charge for all service areas except Monterey. For Monterey, 30% off of the meter charge and tiers one, two, and three of the commodity charge.