

Decision **PROPOSED DECISION OF ALJ COOKE** (Mailed 1/28/2003)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of CALIFORNIA-AMERICAN WATER COMPANY (U 210 W) for an Order (1) Expanding its Existing Certificate of Convenience and Necessity to Include the Provision of Wastewater Services to the Public, Including the Right to Recover Rates for such Services; (2) Authorizing Applicant to Create its Monterey Wastewater Division and Service Area and to Acquire the Wastewater Assets of and to Serve Wastewater Customers in Each of the Following Three Monterey County-Owned Systems: CSA 72 - Las Palmas Ranch, CSA 10 - Laguna Seca Ranch and Carmel Valley County Sanitation District; and (3) Authorizing Applicant to File a Single System-Wide Rate Schedule and Related Tariffs for All Three Acquired Wastewater Systems in its Monterey Wastewater Division.

Application 02-05-058
(Filed May 24, 2002)

(See Appendix A for a list of appearances.)

**OPINION GRANTING CALIFORNIA-AMERICAN WATER COMPANY
A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
TO PROVIDE WASTEWATER SERVICE; AUTHORIZING ACQUISITION OF
WASTEWATER ASSETS; AND ADOPTING RATES**

1. Summary

This decision grants the application of California-American Water Company to expand its Certificate of Public Convenience and Necessity to provide wastewater services, acquire assets of the County of Monterey, and provide service to all customers under a system-wide tariff.

2. Request

By this application, California-American Water Company (Cal-Am) seeks to expand its Certificate of Public Convenience and Necessity (CPCN) to provide wastewater services. Cal-Am's current CPCN only allows it to provide water service, and it does not currently own wastewater assets in California. Cal-Am seeks permission to acquire three wastewater districts that the County of Monterey (County) put up for sale through a request for bid process; Cal-Am was the winning bidder. If granted permission to acquire the wastewater districts, Cal-Am would create a Monterey Wastewater Division and serve the division with a single tariff as proposed in its bid to the County.

The purpose of this proceeding is to determine whether or not Cal-Am should be granted permission to expand its CPCN to provide wastewater service, acquire three wastewater districts from the County, and charge the proposed rate for service to all customers.

The issues raised by the application fall into three primary areas: health and safety; rates, accounting, and ratemaking; and gray water entitlements. The broad category of health and safety includes the experience of Cal-Am relevant to owning and operating a wastewater system, whether the systems being acquired meet minimum standards of design and construction, and whether proposed plant improvements are necessary. In the rate, accounting, and ratemaking area, issues include the accounting treatment of the purchase, the

reasonableness of the proposed rates, whether a single tariff is appropriate, and the rate of return. The final issue is whether customers are entitled to existing or future use of gray water and under what terms. Other issues, including the reasonableness of the costs and operation of the wastewater systems by the County, the County's bidding process, and the County's decision not to hold an election regarding its decision to sell the three wastewater providers were ruled outside of the scope of the proceeding.

3. Background

The Commission issued a preliminary finding in Resolution ALJ 176-3090, issued on June 26, 2002, that the category for this proceeding is ratesetting and determined that the matter did not require hearings. The Office of Ratepayer Advocates (ORA) and John A. Hyland, Jr. (Hyland) each filed a protest with the Commission's Docket Office. Cal-Am filed a reply to the protest of Hyland. The assigned Administrative Law Judge (ALJ) held a prehearing conference (PHC) on July 19, 2002, in San Francisco.

At the PHC, ORA stated that it no longer planned to dispute the proposed rates, despite continued questions about the expected accounting treatment of the purchased assets, but that the County's RFP process had satisfied its concerns with the proposed rates. At the PHC, the ALJ directed Cal-Am to supplement its application to provide additional documentation on its proposed rates, specifically how they are derived and justified.

Pending receipt of the supplement, Commissioner Duque's July 31, 2002, Scoping Ruling preliminarily ruled that hearings were needed and allowed parties to file a request for evidentiary hearings on August 30, 2002, after reviewing Cal-Am's supplemental filing. Hyland timely filed a request for evidentiary hearings. The assigned ALJ directed Hyland to serve prepared

testimony addressing his forecast of reasonable operating expenses and capital additions, and the technical basis for such forecasts.

The ALJ held one day of evidentiary hearings. Opening briefs were filed on November 13, 2002. Reply briefs were filed December 3, 2002. The case was submitted for decision on receipt of reply briefs.

4. History of County Facilities

Each of the districts Cal-Am seeks to acquire has different assets and history.

CSA 72 - Las Palmas Ranch is made up of two plants, with a combined design capacity to handle 235,000 gallons per day of flows from approximately 1,000 residences at full build out. The original cost of the plant assets and real property was \$4,873,000 with current book value of \$3,891,430. (Exhibit 1, Tab G.) According to the protest by Hyland, the Las Palmas Ranch “developer built and paid for the construction of the treatment facilities. The facilities were dedicated to the County of Monterey at no cost to the County.” (Protest, pp. 2-3, emphasis in original.) Las Palmas Ranch customers do not receive water service from Cal-Am.

CSA 10 - Laguna Seca Ranch is made up of two plants, with a combined design capacity to handle flows of 120,000 gallons per day from approximately 300 homes, 35-40 business park offices, a school, and golf course at full build out. At this time, there are only 93 customers. The original cost of the plant assets and real property was \$4,185,000, with current book value of \$3,486,444. (Exhibit 1, Tab G.) Laguna Seca Ranch receives water service from Cal-Am.

Carmel Valley County Sanitation District includes three zones: Zone 1 – Carmel Valley Ranch; Zone 2 – White Oaks; and Zone 3 – Village Greens. Zone 1 facilities are designed to handle 100,000 gallons per day from approximately 325

residences, a hotel, golf course, and tennis club. Expansion by some Zone 1 users are planned, as well as additional housing. Zone 2 and Zone 3 serve 22 and 38 residences, respectively. Customers in this district receive water service from Cal-Am. The original cost of the plant assets and real property for this district was \$2,799,000, with current book value of \$1,204,603. (Exhibit 1, Tab G.)

5. County Process

In 2001, the Monterey County Public Works Department issued a “Request for Statement of Qualifications and Submittal of Proposal” (Request) for the purchase of the three districts described above. Cal-Am was one of several bidders to respond to the Request, and the application includes a copy of Cal-Am’s response (Tab C). The County held public meetings to identify alternative approaches to County ownership of the districts, and the costs associated with each option. On April 2, 2002, the County Board of Supervisors voted to approve the sale of all three wastewater districts to Cal-Am. The agreed upon purchase price for all three districts is \$901,801,¹ which the purchase agreements describe as the “projected outstanding debt” of the Las Palmas Ranch and the Carmel Valley County Sanitation District wastewater systems.²

¹ Cal-Am originally bid \$686,001 for the three districts.

² The purchase agreements contain an adjustment clause that will decrease the price paid by Cal-Am in the event the actual debt is less than the projected debt.

6. Questions Presented

6.1 Should Cal-Am's CPCN be Expanded to Allow it to Provide Wastewater Service?

Cal-Am's application (Tab A) describes the experience its parent corporation, American Water Works Company, Inc. (American), has operating wastewater systems throughout the United States. Exhibit 1, Cal-Am's application supplement, includes additional information regarding Cal-Am's planned operation of the County assets it proposes to acquire. Under interim service agreements with the County, Cal-Am is now operating the districts (see Exhibit 1, Tab A). The Cal-Am personnel who presently and in the future will operate the facilities are described (see Exhibit 1, Tab B). Clearly, Cal-Am has the corporate expertise to successfully manage, operate, and maintain wastewater systems. Specifically, Cal-Am has hired experienced and qualified personnel for the County operations that demonstrate it is well qualified to provide wastewater services to the public. Cal-Am's CPCN should be expanded to include provision of wastewater service to the public.

6.2 Is it in the Public Interest for Cal-Am to Acquire the County Wastewater Districts?

It is clear from the record that the County has experienced significant difficulty operating the wastewater districts within planned budgets and collected revenues. (See, for example, Reference Item B.) The County significantly raised rates for customers of Las Palmas Ranch in 2001 and Laguna Seca Ranch in 1997. Carmel Valley County Sanitation District also has seen increases recently. According to the County materials distributed to the public, the County expects to raise rates again if it is unable to sell the districts to Cal-Am. (See Application, Tab D.) The members of the public who attended the public participation hearing (PPH) held by Administrative Law Judge (ALJ)

Cooke and Commissioner Duque made clear the extreme distrust of the wastewater customers towards the County and its operation of the wastewater facilities. Given these facts, and the fact that Cal-Am's proposal will result in a rate decrease from current rates for 95% of the customers in the districts, it is difficult to conclude the public interest would be served by continued County ownership of the three wastewater districts.

However, numerous citizens in Las Palmas Ranch spoke at the PPH in opposition to Cal-Am's acquisition of the Las Palmas Ranch wastewater facilities. After reviewing the specific concerns raised at the PPH, we have distilled them into three areas: (1) displeasure with the County's actions, (2) lack of local control if Cal-Am acquires the wastewater assets at Las Palmas Ranch, and (3) concern over rates.

Las Palmas Ranch customers are incredibly displeased with the County's management and operations of the wastewater system at Las Palmas Ranch. They feel that the County has mismanaged the system, withheld information, and disregarded their input about ways to solve the problems associated with the wastewater system. In addition, Las Palmas Ranch customers feel that the County should have conducted an election to decide whether to sell County assets to a private company, rather than the decision being made by the Board of Supervisors.

While we understand the dissatisfaction and frustration of Las Palmas Ranch customers with the County, this is not germane to whether it is in the public interest for Cal-Am to acquire the assets. We do not have jurisdiction over the County's management, operation, or decision-making process.

Las Palmas Ranch customers are likewise concerned that if Cal-Am acquires the wastewater facilities, they will lose the ability to exercise any local

control. Several speakers at the PPH expressed the view that homeowners were interested in forming a community services district to operate the wastewater system and were disregarded by the County.

Again, although we understand the concern, there is little we can do to change the County's process. We have no jurisdiction to direct the County to allow the formation of a community services district by the homeowners. While it is true that acquisition of the wastewater system by Cal-Am would remove it from local control, it does not mean that citizens will not be able to participate or work to influence the outcome of decisions that affect the operations of the facilities through PPHs, comments on applications, or sending letters to the Commission expressing their opinions about relevant issues.

Regarding the proposed rates, Las Palmas Ranch customers expressed serious concerns that the rates charged by Cal-Am should not be based on the County's operation of costs, because of their belief that the County mismanaged the wastewater system. They argue that a prudent operator could significantly lower costs and that rates for Las Palmas Ranch customers should decrease considerably. In addition, they object to the proposed single tariff across all three districts. We will address the specific rates in the next section, but we note that Cal-Am's proposed rates result in a decrease from current rates for 95% of the customers in the three districts, including all customers in Las Palmas Ranch. The County has stated that it plans a significant increase in rates for all three districts if it retains control of the wastewater systems. (Application, Tab D.) Therefore, we find that it is in the public interest for Cal-Am to acquire the three wastewater districts from the County, create a Monterey Wastewater Division, and provide service to the wastewater customers in all three districts.

6.3 What Rates Should Cal-Am be Allowed to Charge for Wastewater Service?

Cal-Am proposes to charge rates as follows:

	Current Rates	Year 1	Year 2	Year 3	Year 4	Year 5
Laguna Seca	\$76.17	\$51.25	\$52.53	\$53.84	\$55.19	\$56.57
Las Palmas	\$57.25	\$51.25	\$52.53	\$53.84	\$55.19	\$56.57
Carmel Valley	\$55.00	\$51.25	\$52.53	\$53.84	\$55.19	\$56.57
Village Green	\$39.00	\$43.05	\$47.10	\$51.14	\$55.19	\$56.57
White Oaks	\$24.00	\$33.00	\$40.40	\$47.49	\$55.19	\$56.57

In its Application (Tab K), Cal-Am's proposed tariffs show that Year 2 through 5 correspond to 2003 through 2006. However, elsewhere in the Application (p. 5), Cal-Am describes these rates as being applicable through 2007. For purposes of our review, we consider Year 1 to be 2003, resulting in a Cal-Am proposal of rates over a five-year period.

First, we review Cal-Am's estimated expenses to operate each of the wastewater districts it seeks to acquire. Cal-Am, as part of its due diligence process, reviewed the costs and operations of the County but did not rely on the County's historical costs to develop its forecast of operating expenses. Instead, it developed a budget that incorporates cost savings from capital improvements and more efficient operating practices. Cal-Am identified particular costs, for example, sludge disposal, for reduction based on replacement of and improvements to existing equipment.

Cal-Am forecast its fuel and power expenses utilizing a very high per kilowatt-hour (kWh) price for electricity. Hyland, in Exhibit 101, identified this

cost estimate as overstated. Cal-Am reviewed its calculation and agrees that the price / kWh is likely to be lower than its estimate. However, Cal-Am has since received actual usage data from the County which shows that Cal-Am underestimated its electricity usage. Using the more accurate usage data, along with a more reasonable price / kWh, Cal-Am states that the result is that it now expects its fuel and power costs to slightly exceed the forecast it used to derive its \$51.25 / month rate.

Hyland takes issues with various Las Palmas Ranch cost categories in Exhibit 101, for example, labor, capital improvements, depreciation, and labor overheads. We have reviewed Cal-Am's application, testimony and briefs. We found Cal-Am's Operations Superintendent to be credible and able to explain how Cal-Am intended to operate the three wastewater districts differently from the County, how the planned capital improvements affected expected operating expenses, and the expected labor costs. Cal-Am's Director of Business Development reasonably explained how the costs estimates were developed and calculated. Hyland's witness did not adequately explain why he modified certain costs for Las Palmas Ranch, but not others. In addition, he did not thoroughly explain how he derived his cost estimates. We find that Cal-Am has reasonably justified the consolidated operating expenses, labor costs and overheads, and general overhead costs that it utilized to develop its rate proposal to the County.

We must determine if it makes sense for Cal-Am to be allowed to combine the three districts for ratemaking purposes to charge a single tariff. Cal-Am states that the three districts are within a six-mile radius, employ similar treatment processes, and can use the same personnel to manage, operate, and maintain the systems. Cal-Am states that its rate proposal phases-in higher rates

for the 5% of customers who will see a rate increase, and results in immediate decreases for 95% of the customers.

Hyland and customers at the PPH oppose combining the three districts, arguing that the Las Palmas Ranch customers will be subsidizing the rates of the other two districts. In his testimony, Exhibit 100, Hyland provides his calculation of a proper rate for Las Palmas Ranch customers by utilizing Cal-Am's figures from Exhibit 2 (Tab A) and allocating certain costs to districts in a manner different from Cal-Am.

Hyland relies on the same operating expenses in Exhibit 100, but allocates overheads equally among the three districts being acquired, despite the differences in numbers of customers, plant and expected revenues between the districts.³ On brief, Cal-Am states that it calculated the overhead components on a consolidated basis for all three districts, not on a district standalone basis. Cal-Am states that if the overhead expenses were to be calculated on a standalone basis "not all costs would be allocated on a strict one-third basis." (Cal-Am's Brief, p. 24.) Specifically, Cal-Am notes that the entire "Management Fees" line item would be allocated to the Las Palmas Ranch customers because the customers in the other two districts already receive water service from Cal-Am, and thus already have management fees allocated to them. Similarly, general taxes, uncollectibles, interest, depreciation, and income taxes are affected by the plant associated with each district, the expected revenues from customers in each district, and future capital additions. Thus, each of these overhead categories would differ significantly between the three districts being acquired.

³ Cal-Am itself used an equal allocation approach between the districts for labor and labor overhead costs despite the differences in size of the facilities being operated.

Although Cal-Am did calculate operating expenses by district, it never allocated overheads to each district based on revenues, plant, and other characteristics unique to each district. To approximate an appropriate allocation to each district, we have calculated each district's percentage of the total non-labor operating expenses forecast.⁴ The percentage breakdown of non-labor operating expenses forecast for year one is summarized below:

⁴ Non-labor operating expenses were all developed using the operating requirements of the specific wastewater facilities in each district, as opposed to a pro-rata allocation (see Exhibit 2, Tab A, and, therefore, represent a logical way of estimating the percentage of total costs that should be assigned to each district.

	Non-Labor Operating Expense	Customers (Year 1)	Customers (Full Build-Out)
Las Palmas Ranch	48.69%	59.23%	53.63%
Laguna Seca Ranch	21.06%	5.86%	16.81%
Carmel Valley (all zones)	30.24%	34.91%	29.56%

As demonstrated by the above table, Las Palmas Ranch constitutes 59.23% of the total customers Cal-Am seeks to serve under this application but the forecast cost to serve the same customers represents only 48.69% of the total forecast non-labor operating expenses. Thus, Hyland is correct that the proposed rate that Las Palmas Ranch and Carmel Valley customers would pay in Year 1 does include a subsidy of customers in another district, in this case, Laguna Seca Ranch customers. However, as Laguna Seca Ranch expands to reach its full build out capacity of 300 homes, compared to the current 78 residential customers, the percentage of customers in each district is much closer aligned with the percentage of non-labor operating expenses.

Adoption of a single tariff in this case provides stability for rates in all three districts by allowing the costs of capital additions to be spread over a larger ratepayer body. The proposed single tariff does not result in an unreasonable rate, because we found Cal-Am's cost estimates to provide service to be reasonable. The proposed single tariff results in more equitable pricing among neighboring customers and thus does not result in undue discrimination. Finally, all customers in Las Palmas Ranch will receive a decrease from current rates under Cal-Am's single tariff. Therefore, although some subsidy is

occurring between districts, on balance, we find that adoption of a single tariff for the three districts being acquired, best serves the public interest.

Cal-Am will file a general rate case for its Monterey Wastewater Division for Test Year 2008. We expect that Cal-Am will incorporate cost savings it accrues into future rates.

6.4 What Gray Water Obligations Must Cal-Am Uphold as a Result of its Acquisition of the Wastewater Districts?

The purchase agreements entered into by Cal-Am and the County obligate Cal-Am to assume all of the County's obligations to supply reclaimed water (gray water) to the three districts being acquired. It is unclear from the existing reclaimed water agreement between the County and Las Palmas Ranch whether the agreement covers common areas in both phases of the Las Palmas Ranch development. At the evidentiary hearing, Cal-Am agreed to enter into additional agreements to clarify that it will provide reclaimed water from the Las Palmas treatment plant to the common areas of Las Palmas Ranch, at no cost, for as long as the treatment plant operates. (RT 130:3-7, Alario.) We find that it is appropriate for Cal-Am to clarify this obligation through entering into a contract with Las Palmas Ranch to specify that the obligation to supply reclaimed water at no cost applies to the common areas of both phases of the Las Palmas Ranch development. In addition, Cal-Am should assume all other obligations to supply reclaimed group water in the three districts, consistent with the County's current obligations.

7. Comments on Proposed Decision

The proposed decision of ALJ Cooke in this matter was mailed to the parties in accordance with Pub. Util. Code § 311(d) and Rule 77.1 of the Rules of

Practice and Procedure. Comments were filed on _____, and reply comments were filed on _____.

8. Assignment of Proceeding

Geoffrey Brown is the Assigned Commissioner and Michelle Cooke is the assigned ALJ in this proceeding.

Findings of Fact

1. The County of Monterey sought to sell three wastewater districts and through a public process issued a “Request for Statement of Qualifications and Submittal of Proposal.”
2. On April 2, 2002, the Board of Supervisors for the County voted to approve the sale of the three wastewater districts to Cal-Am for \$901,801.
3. Cal-Am is well qualified to provide wastewater services to the public.
4. Cal-Am’s acquisition of the three districts will result in a rate decrease from current rates for 95% of customers in the districts.
5. The proposed purchase price is less than the book value of the wastewater assets. Residents of Las Palmas Ranch are dissatisfied with the County’s operation of, and rates for, their wastewater services.
6. Cal-Am’s proposed tariffs are based on cost estimates under its intended operation of the three districts on a consolidated basis, incorporate planned capital improvements and their impact on operating expenses, and expected labor costs.
7. Cal-Am’s proposed tariffs are based on reasonable cost estimates to operate the three wastewater districts.
8. Adoption of a single tariff in all three districts provides rate stability and equitable pricing among neighboring customers without undue discrimination.

9. The existing reclaimed water agreement between the County and Las Palmas Ranch is unclear about whether the obligation covers common areas in both phases of the Las Palmas Ranch development.

Conclusions of Law

1. Cal-Am's CPCN should be expanded to include provision of wastewater service to the public.

2. It is in the public interest for Cal-Am to acquire the three wastewater districts from the County.

3. Cal-Am's proposed tariffs are reasonable.

4. Year 1 of the proposed tariffs in Schedule 8.3 of the Purchase Agreements (Application, Tab G and H) should be effective upon completion of the acquisition and shall be in effect for the remainder of calendar year 2003.

5. Cal-Am should assume all obligations to supply reclaimed water in the districts being acquired consistent with the County's current obligations and should enter into a contract with Las Palmas Ranch to clarify that its obligation to supply reclaimed water at no cost applies to the common areas of both phases of the Las Palmas Ranch development for as long as the treatment plant operates.

O R D E R

IT IS ORDERED that:

1. California-American Water Company's (Cal-Am) existing Certificate of Public Convenience and Necessity as approved in Decision 70418 is expanded to include provision of wastewater utility services to the public, including the right to recover rates for such services.

2. Cal-Am may acquire all of the wastewater assets of the following three wastewater districts currently owned by the County of Monterey (County): Las

Palmas Ranch (CSA 72); Laguna Seca Ranch (CSA 10); and Carmel Valley County Sanitation District at a price not to exceed \$901,801.

3. Cal-Am shall record the purchase of the districts described in Ordering Paragraph 2 at a December 31, 2002 net book value not to exceed \$901,801, as further set forth in Exhibit 1, Tab G.

4. Upon acquisition of the districts described in Ordering Paragraph 2, Cal-Am shall have the obligation to provide wastewater services to those customers through the creation of its Monterey Wastewater Division.

5. Cal-Am shall file a single rate schedule and related tariffs to serve the customers of the districts described in Ordering Paragraph 2 consistent with the “Five-year Interim Rate Schedule” set forth in Schedule 8.3 of the Purchase Agreements (Application, Tab G and H) and proposed tariff rules (Exhibit 1, Tab D). Year 1 rates shall be effective upon completion of the acquisition and shall be in effect for the remainder of calendar year 2003.

6. Cal-Am shall assume all obligation to supply reclaimed water in the districts described in Ordering Paragraph 2, consistent with the County's current obligations, and shall enter into a contract with Las Palmas Ranch to clarify that its obligation to supply reclaimed water at no cost applies to the common area of both phases of the Las Palmas Ranch development for as long as the treatment plant operates.

7. This proceeding is closed.

This order is effective today.

Dated _____, at San Francisco, California.

APPENDIX A
(List of Appearances)

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(END OF APPENDIX A)