

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 21, 2009

Draft Resolution W-4732
Agenda ID #8200

TO: ALL WATER AND SEWER UTILITIES

This is a revised draft Resolution previously circulated by Division of Water and Audits (Division). This draft Resolution will not appear on the Commission's agenda for at least 30 days after the date it is mailed. The Commission may act then, or it may postpone action until later.

When the Commission votes on a draft Resolution, it may adopt all or part of it as written, amend, modify or set it aside and prepare a different Resolution. Only when the Commission acts does the Resolution become binding on the parties.

Parties may submit comments on the draft Resolution. An original and two copies of the comments, with a certificate of service, should be submitted to:

James Boothe
Project Manager
Division of Water and Audits
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Any comments on the draft Resolution must be received by the Division by May 11, 2009. Those submitting comments must serve a copy of their comments on 1) the service list attached to the draft Resolution, 2) all Commissioners, and 3) the Director of the Division of Water and Audits, on the same date that the comments are submitted to the Division.

Comments shall be limited to five pages in length plus a subject index listing the recommended changes to the draft Resolution, a table of authorities and an appendix setting forth the proposed findings and ordering paragraphs. Replies to Comments are due on May 18, 2009.

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Comments shall focus on factual, legal or technical errors in the draft Resolution, and shall make specific reference to any applicable law. Comments that fail to do so will be accorded no weight and are not to be submitted.

Late submitted comments will not be considered.

/s/ Rami S. Kahlon

RAMI S. KAHLON

Director

Division of Water and Audits

Enclosures: Draft Resolution W-4732

Certificate of Service

Service List

DRAFT

WATER/RSK/FLC/JB5/jlj

AGENDA ITEM #8200

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Division of Water and Audits
Water and Sewer Advisory Branch**

**Resolution No. W-4732
May 21, 2009**

RESOLUTION

**(RES. W-4732), DELEGATION OF AUTHORITY TO STAFF
TO ISSUE CITATIONS TO WATER AND SEWER
CORPORATIONS TO ENFORCE COMPLIANCE WITH
THE COMMISSION'S ORDERS AND THE PUBLIC
UTILITIES CODE; PROCEDURES FOR APPEAL OF
CITATIONS.**

SUMMARY

This resolution delegates authority to staff for enforcing compliance by water and sewer utilities with the Commission's orders and the Public Utilities Code. Delegating authority to staff will allow the Commission to promptly respond to threats and protect the public interest from violations of the Commission's Orders and the Public Utilities Code. This program is designed to utilize resources efficiently and enhance overall regulation in California. The staff will issue citations only after written notice of non-compliance or violation has been given to the water or sewer utility and the water or sewer utility has failed to correct the non-compliance or violation in a timely manner. The staff is delegated authority to draft and issue citations for specific violations and levy penalties in specified amounts as set forth in Appendix A.

BACKGROUND

Section 701 of the Public Utilities Code authorizes the Commission to "supervise and regulate every public utility in the State ... and do all things, whether specifically designated in this part or in addition thereto, which are necessary and convenient in the exercise of such power and jurisdiction." More specifically, Section 702 of the Public Utilities Code mandates

Every public utility shall obey and comply with every order,
decision, direction, or rule made or prescribed by the commission in

the matters specified in this part, or any other matter in any way relating to or affecting its business as a public utility, and shall do everything necessary or proper to secure compliance therewith by all of its officers, agents, and employees.

In turn, under Section 2101 of the Public Utilities Code, the Commission is directed "to see that the provisions of the constitution and statutes of this State affecting public utilities, the enforcement of which is not specifically vested in some other officer or tribunal, are enforced and obeyed" Pursuant to this authority, and under this direction, the Commission has adopted, and at various times amended General Orders 103 (*Rules Governing Water Service Including Minimum Standards for Design and Construction*) and 96-B (which includes rules for filing utility tariffs and informational reports).

California law, including Public Utilities Code Section 7, authorizes the Commission to delegate certain powers to its staff, including the investigation of facts preliminary to agency action, and the issuance of citations in specified amounts for particular kinds of violations, subject to appeal to the Commission. Over the last several years the Commission has used this delegation of citation authority in numerous areas, including household good movers, charter party carriers, passenger stage corporations, propane gas distribution system operators, power plant operators, telecommunication providers, and energy service providers. This proposed resolution is consistent with these other approved citation programs.

CITATIONS

Before issuing a citation, staff will issue a written Notice to Comply to the water or sewer utility giving the specific violation along with the potential fine and will provide at least 30 days for the water or sewer utility to achieve compliance for non-health and safety related violations. For health and safety related violations the staff Notice to Comply will provide 3 days to comply, or such shorter time as is appropriate under the particular circumstances. A utility may request an extension of time to achieve compliance, based on a showing of good cause. This resolution authorizes the staff to issue a citation to any water or sewer utility for violations listed in Appendix A if the utility does not come into compliance by the time stated in the Notice to Comply, or any extension thereof.

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Appendix A lists penalty schedules for specified violations. The penalties are denominated in a dollar amount per “event”. Each issuance of a Notice to

Comply may trigger a separate “event”. In other words, a separate penalty may be assessed pursuant to Appendix A for each Notice to Comply if the utility does not come into compliance within the time stated in the Notice to Comply. Thus, additional penalties may be imposed where a utility fails to cure a continuing violation, but in order for there to be an additional penalty, there must be a separate Notice to Comply (with a separate compliance date).

Payment of a citation does not prevent the Commission from taking other remedial measures, including, but not limited to, issuing an order instituting investigation in the event the underlying violation is unresolved or the payment of monies to third parties.

Authorizing staff to issue citations for the violations listed in Appendix A has been identified as necessary to fulfill the Commission’s regulatory mandate to ensure that water and sewer utilities provide safe and reliable service at a reasonable rate. Specific fines are established for each of the listed violations appropriate to the potential harm to the public interest, as well as to ensure compliance with the Commission’s orders and the Public Utilities Code. A water or sewer utility that has been issued a citation may accept the fine imposed or contest it through a process of appeal. The following procedures govern the issuance and appeal of these citations.

1. *Contents.* The citation served upon the water or sewer utility (Respondent) by the staff will include:
 - (a) A specification of each alleged violation, including citation to the statute, rule, or order allegedly violated;
 - (1) while the citation need not include all supporting evidence, staff will make the evidence available for timely inspection upon request by the Respondent;
 - (b) A statement of the facts upon which each alleged violation is based;
 - (c) A statement that the Respondent may pay the amount of the fine set forth in the citation, agree with staff on conditions for payment, or appeal the citation, and that the Respondent will forfeit the right

to appeal the citation by failing to do one of these things within 30 days;

- (d) An explanation of how to file an appeal, including the Respondent's right to have a hearing, to have a representative at the hearing, to request a transcript, and to request an interpreter; and
 - (e) A form for Notice of Appeal and the form for requesting an interpreter.
- 2. *Service of Citation.* Service of the citation shall be effected either personally on the owner or an officer of the Respondent or by first-class mail. Citations served by first class mail may be sent to the Respondent's business address, or the address for the service of process of the Respondent filed with the Secretary of State of California.
- 3. *Response.*
 - (a) Within 30 days after the date of service of the citation, Respondent shall remit payment of the full amount of the fine with notice to staff, agree with staff on conditions for payment, or serve a Notice of Appeal upon staff. Before the expiration of this deadline, staff, an Administrative Law Judge ("ALJ"), or the Commission may extend the time for response upon a showing of good cause.
 - (b) Unless otherwise specified, a requirement to notify staff or serve staff means to send a written communication by the U.S. Mail or an express mail service to the address specified in the citation. These written communications are not filed with the Commission's Docket Office. In addition to, or instead of, communications by mail service, staff may allow electronic submissions.
- 4. *Payment of fine; default.*

- (a) Payment of fines shall be submitted to the Commission's Fiscal Office, 505 Van Ness Avenue, San Francisco, CA 94102, in the form of certified check, payable to the Public Utilities Commission for the credit of the State General Fund.
- (b) If Respondent pays the full amount of the fine within the time allowed, the citation shall become final. Failure to pay the full amount of the fine or to file a Notice of Appeal will place Respondent in default, the citation shall become final, and the Respondent will have forfeited its right to appeal the citation. A late payment is subject to a penalty of 10 percent.

5. *Appeal.*

- (a) An appeal shall be brought by serving a Notice of Appeal upon staff, and the Respondent shall indicate the grounds for the appeal in the notice.
- (b) Upon receipt of a timely Notice of Appeal, staff shall promptly provide a copy of the Notice of Appeal to the Chief Administrative Law Judge. The Chief Administrative Law Judge shall promptly designate an Administrative Law Judge to hear the appeal.
- (c) The assigned Administrative Law Judge shall set the matter for hearing promptly. The Respondent and staff will be notified at least ten days in advance of the time, date and place for the hearing. The Administrative Law Judge may, for good cause shown or upon agreement of the parties, grant a reasonable continuance of the hearing.
- (d) Any appeal of a citation shall be heard in the Commission's courtroom in San Francisco or Los Angeles. .
- (e) Upon a good faith showing of language difficulty, the Respondent will be entitled to the services of an interpreter at the Commission's expense upon written request to the assigned Administrative Law Judge not less than three business days prior to the date of the hearing.

- (f) The Respondent may order a transcript of the hearing, and shall pay the cost of the transcript in accordance with the Commission's usual procedures.
- (g) The Respondent may be represented at the hearing by an attorney or other representative, but such representation shall be at the Respondent's sole expense.
- (h) At the hearing, staff will bear the burden of proof in establishing a violation. Staff will also bear the burden of producing evidence and, therefore, shall open and close. The ALJ may, in his or her discretion, alter the order of presentation. Rule 13.6 (Evidence) of the Commission's Rules of Practice and Procedure is applicable.
- (i) Ordinarily, the appeal will be submitted at the close of the hearing. Upon a showing of good cause, the ALJ may keep the record open for a reasonable period to permit a party to submit additional evidence or argument.
- (j) Within 60 days after the appeal is submitted, the ALJ will issue a draft resolution resolving the appeal. The draft resolution will be placed on the first available agenda, consistent with the Commission's applicable rules. Parties may file comments on the draft resolution pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure.
- (k) A final Commission resolution is subject to the rehearing rights under Public Utilities Code Section 1731 and to judicial review under Public Utilities Code Section 1756.
- (l) During the period described in the next sentence, none of the following may communicate regarding the appeal, orally or in writing, with a Commissioner, Commissioner's advisor, or ALJ: the Respondent, the staff that issued or is enforcing the citation, or any agent or other person on behalf of the Respondent or such staff. This prohibition applies from the date that staff receives a Notice of Appeal to and including the date when the period to apply for rehearing of the Commission resolution on the appeal has expired and no application for rehearing has been filed, or if an application for rehearing is filed, the date when the Commission

serves the decision finally resolving the application for rehearing.
Inquiries strictly limited to procedural matters are permitted.

NOTICE AND COMMENT

A prior draft of this draft resolution was mailed to all water and sewer service utilities and other interested parties in accordance with Section 311 of the Public Utilities Code. Comments were allowed under Rule 14.5 of the Commission's Rules of Practice and Procedure. Comments were filed on January 12, 2009 by

the California Water Association (CWA). CWA raised concerns over the discretion given staff in determining what constitutes a violation and then assessing a fine. The specification of particular violations and associated fines that have been added in Appendix A addresses CWA's concerns over the Commission's delegation of its authority to Commission staff.

The revised draft resolution was mailed to all water and sewer service utilities and other interested parties on April 21, 2009. Comments are to be served pursuant to Rule 14.5 of the Commission's Rules of Practice and Procedure. Comments on the revised draft resolution are due by May 11, 2009.

FINDINGS

1. Public Utilities Code Section 701 authorizes the Commission to supervise and regulate every public utility in the State.
2. Public Utilities Code Section 702 mandates every public utility to obey and comply with every Commission order, decision, direction, or rule.
3. Public Utilities Code Section 2101 directs the Commission to see that the provisions of the State constitution and statutes dealing with public utilities are enforced and obeyed.
4. California law including Public Utilities Code Section 7 authorizes the Commission to delegate certain powers to its staff, including the investigation of acts preliminary to agency action, and the issuance of citations in specified amounts for particular kinds of violations.
5. The proposed citation program for water and sewer utilities described above is needed to ensure effective and efficient enforcement of Commission decisions and orders.

6. The proposed citation program for water and sewer utilities is similar to citation programs adopted by the Commission for other industries.
7. The water and sewer utility citation program as described above and in the Specified Violations and Penalty Schedules, Appendix A, is reasonable, will facilitate achieving compliance with Commission decisions and orders in protecting the public interest, and will help to deter future violations.
8. Water and sewer utilities will be provided prior written notice to cure a violation before a citation is issued.
9. The water and sewer utility citation program includes the ability to appeal staff's issuance of citations and penalties.
10. Payment of a citation does not preclude the Commission from taking other remedial measures.

IT IS ORDERED:

1. The citation program described in the section above entitled "Citations" and in the Specified Violations and Penalty Schedules, attached as Appendix A, is hereby adopted to govern the issuance and appeal of citations for violation of statutes, orders or rules relating to water and sewer utilities.
2. This resolution is effective today.

DRAFT

RESOLUTION NO. W-4732
RSK/FLC/JB5/jlj

May 21, 2009

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on May 21, 2009, the following Commissioners voting favorably thereon:

PAUL CLANON
Executive Director

APPENDIX A:**SPECIFIED VIOLATIONS AND PENALTY SCHEDULES**

SPECIFIED VIOLATION	PENALTY SCHEDULE	PENALTY SCHEDULE
	Class A Utilities	Class B, C, and D Utilities
Charging fees not authorized by the Commission	\$1,000 per event	\$500 per event
Charging rates higher than authorized	\$1,000 per event	\$500 per event
Not charging developers for special facilities in violation of Tariff Rule 15	\$20,000 per event	\$1000 per event
Not refunding excess deposits to developers or individual customers in violation of Tariff Rule 15	\$1,000 per event	\$500 per event
Installing new facilities that do not meet that standards or fire flow requirements of General Order 103	\$20,000 per event	\$1000 per event
Not refunding deposit after 12 months when the customer has met the payment requirements for service pursuant to Tariff Rule 5.C & 7.E	\$500 per event	\$250 per event

Not responding to water outages as specified in Tariff Rule 14 and G.O. 103	\$1000 per event	\$500 per event
Not following safety standards when doing repairs as specified in G.O. 103	\$1000 per event	\$500 per event
Not restoring the work area specified in G.O. 103 after performing repairs	\$1000 per event	\$500 per event
Shutting off a customer's water for non-payment of bill without the notice required by Tariff Rule 11.B.1.i	\$1000 per event	\$500 per event
Non-compliance with Commission Ordering Paragraphs not otherwise specified herein	\$10,000 per event	\$1,000 per event
Misrepresenting information in violation of Rule 1	\$20,000 per event	\$2000 per event
Failing to remedy defects or failing to file a required report on time or at all, in violation of Rule 6.2 of General Order 96-B	\$1000 per event	\$500 per event
Failing to submit a timely or satisfactory revision to a tariff effective pending disposition after notice by the Division of Water and	\$1000 per event	\$500 per event

Audits, in violation of Rule 7.5.3 of General Order 96-B		
Not keeping records of customer complaints in accordance with Paragraph I.8 of G.O 103	\$1000 per event	\$500 per event
Not complying with Water Quality Standards of the Department of Public Health in accordance with Paragraph II.1.a of G.O.103	\$1000 per event	\$500 per event
Not complying with water pressure requirements of Paragraph II. 3 of G.O. 103	\$1000 per event	\$500 per event
Not complying with Water Supply requirements of Paragraph III.4 of G.O 103	\$20,000 per event	\$1,000 per event
Not filing Annual Reports	\$1,000 per event	\$500 per event
Misusing or misappropriating the SDWBA and SRF surcharge funds collected from customers	\$20,000 per event	\$2,000 per event
Not complying with the Commission's filing requirements for general rate cases as specified in the Rate Case Plan for Class A utilities and Standard Practice U-46-W for Class B & C utilities	\$10,000 per event	\$1,000 per event

(END OF APPENDIX A)

CERTIFICATE OF SERVICE

I certify that I have by mail this day served a true copy of draft Resolution W-4732 on all parties in these filings or their attorneys as shown on the attached list.

Dated April 21, 2009, at San Francisco, California.

/s/ Josie L. Jones

JOSIE L. JONES

NOTICE

Parties should notify the Division of Water and Audits, Public Utilities Commission, 505 Van Ness Avenue, Room 3106, San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the Resolution number of the service list on which your name appears.

SERVICE LIST
DRAFT RESOLUTION W-4732

Service list is attached.

Jim Moore
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BOULDER CREEK CA 95006

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California Hot Springs Sewer Service
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CALIF HOT SPRINGS, CA 93207

Thomas R. Adcock
California Utilities Service, Inc.-Sewer
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SALINAS CA 93915

Lesley Silva
California-American Water Co.-Sewer
50 Ragsdale Dr., Ste. 100
MONTEREY CA 93940

Derinda Messenger
Canada Woods Water Company-Sewer
P.O. Box 2119
SALINAS CA 93901

Jerry Burger
Dunnigan Water Works – Sewer
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PASO ROBLES CA 93447

James P. Sears
Interstate 5 Utility Company, Inc.-Sewer
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BAKERFIELD CA 93301

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Lewiston Valley Water Co., Inc.-Sewer
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LEWISTON CA 96052-0101

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Rolling Green Utilities, Inc.-Sewer
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BIG PINE CA 93513

Charles Baker
Rural Water Company, Inc. -Sewer
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GROVER BEACH CA 93483

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California Water Service Company
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SAN JOSE CA 95112

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SAN DIMAS CA 91773-9016

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Palle Jensen
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SAN JOSE CA 95196-0001

Robert DiPrimio
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EL MONTE CA 91734

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COVINA CA 91724-3603

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Alco Water Service
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SALINAS CA 93905

Robert S. Fortino
Del Oro Water Co., Inc.
Drawer 5172
CHICO CA 95927

Lawrence Morales
East Pasadena Water Company
3725 East Mountain View Avenue
PASADENA CA 91107

Robert C. Cook, Jr.
Fruitridge Vista Water Company
1108 Second Street, STE. 204
SACRAMENTO CA 95814

Steve Glazer
Agate Bay Water Company
5424 Tree Side Drive
CARMICHAEL CA 95608

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Arrowhead Manor Water Co., Inc.
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SOQUEL CA 95073

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Bakman Water Co.
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FRESNO CA 93947

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BASS LAKE CA 93604-0109

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Big Basin Water Co., Inc.-Water
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LAKE ISABELLA CA 93240

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CARNELIAN BAY CA 96140

Daniel West
Graeagle Water Company, Inc.
P. O. Box 310
GRAEAGLE CA 96103

Roger Forrester
Hillview Water Company
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OAKHURST CA 93644

Danny G. Lukins
Lukins Brothers Water Company, The
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SOUTH LAKE TAHOE CA 96150

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McCanna Ranch Water Company
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SAN DIEGO CA 92101

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MERCED CA 95340-0218

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BRADLEY CA 93426

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GUALALA CA 95445-1000

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Mary Condon
Sea Ranch Water Company
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THE SEA RANCH CA 95497-0016

Audrey Schuyler
Searles Domestic Water Company
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TRONA CA 93592

Akbar Jazayeri
Southern California Edison Co.
P. O. Box 800
ROSEMEAD CA 91770

E. B. Marr
Tahoe Cedars Water Company
P. O. Box 264
TAHOMA CA 96142

Richard M. Dewante
Tahoe Park Water Co.
P. O. Box 5627
TAHOE CITY CA 96145

Kenneth Harrington
Yosemite Spring Park Utility Co.
30250-B Yosemite Springs Pkwy
COARSEGOLD CA 93614-9051

Charles W. Roberts
Alpine Village Water Company
P. O. Box 908
PORTERVILLE CA 93257

Collette Titgen
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47475 Arroyo Seco Road
GREENFIELD CA 93927

Peter Nolasco
Baycliff Subdivision
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LOWER LAKE CA 95457

Victor D. Kliewer
Beasore Meadows Water System
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CALIF HOT SPRINGS CA 93207

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Canada Woods Water Company
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SALINAS CA 93901

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Casmite Corporation
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SAN LUIS OBISPO CA 93406

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CAZADERO CA 95421

Sandra McDougald
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FRIANT CA 93626

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Central Water System
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PORTERVILLE CA 93257

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Cobb Mountain Water Co.
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COBB CA 95426

Peter J. Kerns
Cold Springs Water Co., Inc.
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COLD SPRINGS CA 95335

Beatrice Miller
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AVERY CA 95224

Jerry Burger
Dunnigan Water Works
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PASO ROBLES CA 93447

Francis H. Ferraro
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Everett Hodges
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Gary Ledesma
Mecchi Water Company
500 Sunnybrook Drive
CAMPBELL CA 95678

Jay Gardner
Meyers Water Company
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NAPA CA 94559

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William L. Ostrom
R. R. Lewis Small Water Company
3802-A N. Wilcox Road
STOCKTON CA 95215

Michael Dunn
Ramona Water Company
c/o Steve Garcia
P. O. Box 928
PALM DESERT CA 92261

Michael Laughlin
River Island Water Company
31910 Country Club Drive
PORTERVILLE CA 93257

Walter Carpenter
Riverview Acres Water Company
P. O. Box 81
SALYER CA 95563

Angelo Louis Andreini III
Riverview Estates Water Company
P. O. Box 1134
RED BLUFF CA 96080-1134

Arnie Peterson
Rolling Green Utilities, Inc.
139 Elmcrest Drive
BIG PINE CA 93513

Skip Rouch
Sequoia Crest, Inc.
55124 Redwood Drive
SPRINGVILLE CA 93265

Hal Wood
Serenio Del Mar Water Company
P. O. Box 457
FORESTVILLE CA 95436-0457

Charles K. Smith
Sierra City Water Works, Inc.
732 Butler Road
GRASS VALLEY CA 95945

Satoi Mills
Slide Inn/Snobowl Water Company
3430 Tully Road, Suite 20-228
MODESTO CA 95350

Marian Seiter
Sonoma Springs Water Co., LLC
P. O. Box 1175
KENWOOD CA 95452

Beverly Brown
Sonora Water Company
P. O. Box 996
SONORA CA 95370-0996

Shawn Heffner
Spreckels Water Company
c/o California Water Service Company
1720 North First Street
SAN JOSE CA 95112-4598

Gloria Eighme
Stewart Water Co., Inc.
c/o Gordon Acres Self Help Assn.
P. O. Box 1035
LUCERNE VALLEY CA 92356

Richard Herman
Susan River Park Water Company
c/o Carol Curry
30 South Roop Street
SUSANVILLE CA 96130

John Ballard
Timberland Water Service
P. O. Box 1855
PENN VALLEY CA 95946-1855

C. Kay Heath
Trinity Village Water Company
P. O. Box 556
SALYER CA 95563

Steve Havens
Twin Valley Water Co., Inc.
P. O. Box 433
MORGAN HILL CA 95038

Terry Lee Lane
Spring Crest Water & Power Co.
67-115 Ribbonwood Drive
MOUNTAIN CENTER CA 92561

Leonard J. Weston
Stone Creek Water Co., Inc.
72810 Ambrosia Street
PALM DESERT CA 92260-5971

Steven M. Glazer
Tahoe Swiss Village Utilities, Inc.
P. O. Box 102
HOMEWOOD CA 96141

Tito Balling
Traver Water Company
P. O. Box 343
COALINGA CA 93210

Alpha Annett
Twin Lakes Enterprises
P. O. Box 455
BRIDGEPORT CA 93517

S. O. Patterson
Vista Grande Water System
P. O. Box 900
GERBER CA 96035

Gary G. Pace
Warring Water Service, Inc.
P. O. Box 189
PIRU CA 93040

Douglas Elliott
Watertek Incorporated
1314 East Springville Drive
PORTERVILLE CA 93257

Gerry LaBudde
Weimar Water Company, Inc.
P. O. Box 598
WEIMAR CA 95736-0598

Charlie Judson
Wendell Water Company
P. O. Box 176
SEBASTOPOL CA 95473

John L. West
West Riverside Canal Company
P. O. Box 3617
RIVERSIDE CA 92519

Bob Ukestad
West San Martin Water Works, Inc.
1005 Highland Avenue
SAN MARTIN CA 95046

Tom W. Johnson
West Water Company
335 Else Way
CLOVERDALE CA 95425

Robert M. Berry
Yerba Buena Water Company
P O. Box 3829
PASO ROBLES CA 93447

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1275 Spring Garden Ranch Road
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