

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



January 2, 2024

Kiki Carlson
Regulatory Affairs Manager
Suburban Water Systems
1325 N. Grand Ave., Ste. 100
Covina, CA 91724-4044

Dear Ms. Carlson,

The Water Division of the California Public Utilities Commission has approved Suburban Water Systems' Advice Letter No. 395-A, (Supplement to Advice Letter No. 395), filed on December 5, 2023, regarding authorization to convert Drinking Water Fees Memorandum Account to Drinking Water Fees Balancing Account.

Enclosed are copies of the following revised tariff sheets, effective December 10, 2021, for the utility's files:

P.U.C. Sheet

No.	Title of Sheet
1816-W	Preliminary Statement (Continued) No. Z Drinking Water Fees Balancing Account (DWFBA)
1817-W	Table of Contents

Please contact Alison Pafford at APF@cpuc.ca.gov or 415-417-7615, if you have any questions.

Thank you.

Enclosures

PRELIMINARY STATEMENT
(Continued)

Z. Drinking Water Fees Balancing Account (DWFBA)

(D)

(N)

1. PURPOSE:

The purpose of the Drinking Water Fees Balancing Account (DWFBA) is to track the difference between all actual fees charged by the State Water Resources Control Board (State Water Board), and the fees authorized in rates.

2. APPLICABILITY:

The DWFBA applies to all service areas.

3. ACCOUNTING PROCEDURE:

The following entries shall be recorded to the balancing account:

- a. The DWFBA will track the difference between the annual drinking water fees charged by the State Water Board and the drinking water fees authorized in rates.
- b. Interest shall accrue to the DWFBA on a monthly basis by applying the interest rate equal to one-twelfth of the 3-month non-financial Commercial Paper Rate, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of-month and the end-of-month balances.

4. DISPOSITION:

Suburban shall report on the status of the balancing account in its general rate case and shall propose adjustments to their rates in the context to amortize under- or over-collections in the account subject to reasonableness review. Suburban also may propose such rate adjustments by advice letter at any time that the under- or over-collection in any such account exceeds two percent (2%) of annual revenues for the utility or a ratemaking district of the utility.

5. EFFECTIVE DATE:

The DWFBA shall go into effect on the effective date of Advice Letters 395-W-A, which is December 10, 2021.

(N)

(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 395-W-A

Craig D. Gott

Date Filed 12/05/2023

Name

Decision No. _____

President

Effective 12/10//2021

Title

Resolution No. _____

Suburban Water Systems
1325 N. Grand Ave., Ste. 100
Covina, CA 91724-4044

Revised
Canceling Revised

Cal. P.U.C. Sheet No. 1945-W
Cal. P.U.C. Sheet No. 1943-W

TABLE OF CONTENTS

<u>Subject Matter of Sheet</u>	<u>Cal. P.U.C. Sheet No.</u>
Title Page	1903-W
Table of Contents	1945-W, (T) 1935-W, 1940-W
Preliminary Statement	1904-W, 1487-W, 1488-W, 1628-W – 1633-W, 1795-W 1635-W – 1637-W, 1882-W – 1883-W, 1640-W 1796-W – 1799-W, 1695-W, 1737-W, 1800-W, 1944-W, (T) 1850-W, 1851-W, 1920-W, 1922-W, 1924-W, 1941-W – 1942-W
Service Area Maps:	
San Jose Hills Service Area – Tariff Areas	1340-W
Whittier/La Mirada Service Area – Tariff Areas	1341-W
Sativa Service Area	1905-W
Rate Schedules:	
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Schedule SJ-2, San Jose Hills Service Area – Non-Residential Metered Service	1886-W, 1893-W, 1839-W, 1872-W
Schedule SJ-3, San Jose Hills Service Area – Recycled Water Metered Service	1887-W, 1894-W, 1840-W, 1831-W, 1873-W
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Schedule No. LIC-1, San Jose Hills and Whittier/La Mirada Service Areas Low Income Credit	1897-W, 1844-W
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(Continued)

(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 395-W

Craig D. Gott

Date Filed 12/05/2023

Decision No. _____

Name

President

Effective 12/10//2021

Title

Resolution No. _____

**CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS**

Advice Letter Cover Sheet

Utility Name: Suburban Water Systems **Date Mailed to Service List:** November 7, 2023
District: n/a
CPUC Utility #: U – 339-W **Protest Deadline (20th Day):** November 27, 2023
Advice Letter #: 395-W **Review Deadline (30th Day):** December 7, 2023
Tier: ☐ ☒ ☐ ☐
 1 2 3 Compliance **Requested Effective Date:** December 10, 2021
Authorization: General Order 96-B Rule 7.3.2(7) and 8.2
Rate Impact: n/a
Description: Convert Drinking Water Fees Memorandum
Account to Drinking Water Fees Balancing
Account (DWFBA)

*The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list.
Please see the "Response or Protest" section in the advice letter for more information.*

Utility Contact: Kiki Carlson

Phone: (626) 543-2553

Email: kcarlson@swwc.com

Utility Contact: Carmelitha Bordelon

Phone: (626) 543-2547

Email: cbordelon@swwc.com

DWA Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

<u>DATE</u>	<u>STAFF</u>	<u>COMMENTS</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

[] APPROVED

[] WITHDRAWN

[] REJECTED

Signature: _____

Comments: _____

Date: _____



**Suburban
Water Systems**

A SouthWest Water Company

1325 N. Grand Ave. Ste. 100, Covina, CA 91724-4044
Phone: 626.543.2500, Fax: 626.331.4848
www.swwc.com

VIA EMAIL

U-339-W

ADVICE LETTER NO. 395-W

November 7, 2023

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Suburban Water Systems (“Suburban”) hereby transmits the following changes in tariff schedules applicable to its service area and which are attached hereto:

CPUC Sheet No.	Title of Sheet	Canceling CPUC Sheet No.
1944-W	Preliminary Statement (Continued) No. Z	1928-W
1945-W	Table of Contents	1943-W

Pursuant to GO 96-B, Water Industry Rules 7.3.2(7) and 8.2, Suburban seeks similar treatment to the authority granted to Class B, C, and D water companies in Resolution (Res.) W-4698 to establish a balancing account for drinking water fees.

Specifically, Suburban requests to convert the previously approved Drinking Water Fees Memorandum Account (DWFMA) to Drinking Water Fees Balancing Account (DWFBA) which tracks all drinking water fees charged by the State Water Resources Control Board (State Water Board) that differ from the adopted drinking water fees in authorized rates. The DWFBA will allow Suburban to track the periodic changes in drinking water fees incremental to costs authorized in rates without having to modify its preliminary statement each time as with the DWFMA. This authority was granted to Class B, C, and D water utilities in Commission Resolution No. W-4698, dated July 31, 2008.

Background

On December 10, 2021, Suburban filed Advice Letter No. 361-W with the CPUC to establish a memorandum account to track the increase in water fees adopted by State Water Board on September 22, 2021, for fiscal year (FY) 2021-22 which increased by 26.6 percent on average for community water systems, including Suburban. Advice Letter No. 361-W was approved by the CPUC with an effective date of December 10, 2021.

On January 3, 2023, Suburban filed A.23-01-001 for authority to increase rates charged for water service, and as part of the Special Request No. 1, Suburban requested the amortization of Drinking Water Fees for period December 10, 2021 through June 30, 2022.

On January 12, 2023, Suburban filed Advice Letter No. 389-W with the CPUC to extend the DWFMA, because on September 16, 2022, the State Water Board proposed adopting emergency regulations to increase annual drinking water fees to conform to the revenue levels set forth in the Budget Act for fiscal year 2022-23. The proposed emergency regulation has significantly increased Suburban expense by \$76,101 or 39% compared to adopted 2022-23 based on the State Water Board’s invoices dated December 21, 2022 for period July 1, 2022 – June 30, 2023. The advice letter was approved by the CPUC with an effective date of January 12, 2023, and Suburban was unable to book the incremental expense for period July 1, 2022 – January 11, 2023.

Since approval of Suburban’s current DWFMA, the State Water Board has continued to increase its drinking water fees on an annual basis, resulting in expense increases that are much higher than those included in presently-authorized rates. On September 19, 2023, the State Water Board adopted Resolution No. 2023-

0035 which increased the drinking water fees for fiscal year 2023-24, and the new and higher expenses are not included in presently-authorized rates.

Small Company User Fee Memorandum and Balancing Accounts: As indicated in Res. W-4698, the Commission has allowed Class B, C, and D water utilities to pass on costs reasonably incurred while complying with water quality and user fees since 1993.¹ In Res. W-4327, memorandum accounts for the small companies were authorized for water quality compliance costs because of the potentially limited financial ability of small water companies to comply, and their less frequent rate case filings.² In the same resolution, the Commission allowed the opening of memorandum accounts for fees charged by the Division of Drinking Water's (DDW's) predecessor³ because "due to the variation in each billing the inclusion of such costs in base rates is often not feasible."⁴

Upon expiration of the memorandum accounts for the small companies, the Commission determined in Res. W-4698 that there was a continued need to track drinking water user fees in a regulatory mechanism,⁵ and further that the appropriate mechanism was a balancing account rather than a memorandum account, stating that:

[T]hese types of costs are always recoverable...; the only issue is the reasonableness of the amount to be recovered. In this they are similar to the purchased water, purchased power and pump tax balancing accounts approved for recovery without an earnings test by D.06-04-037, April 13, 2006. Thus, the accounts tracking these costs should be classified as balancing accounts and recovery should be by advice letter requesting amortization of a Balancing Account (Tier 1).⁶

Suburban's Request for Similar Treatment: Water Industry Rule 8.2 of General Order 96-B states that:

A Utility may submit an advice letter requesting approval, authorization, or other relief similar to that accorded another Utility by Commission order. The advice letter shall cite each decision or resolution relied upon, and shall demonstrate that the Utility submitting the advice letter is similarly situated in all material respects, and is requesting the same relief and relying on the same justification as in the cited order(s).

As discussed in AL 361-W, 389-W, and similar to the experience of the small water companies described in Res. W-4327, Suburban has not been able to reflect the current level of drinking water fees in customer rates because of the "variation" in user fee billing since the State Water Board adopted its new fee structure on September 22, 2021. Suburban seeks the same relief granted to the small water companies in Res. W-4698, pursuant to Water Industry Rule 8.2 of GO 96-B. Accordingly, Suburban requests that its DWFMA

¹ Resolution W-4698, *Order Establishing Water Quality and User Fee Balancing Accounts for Class B, C, and D Water Utilities* (Res. W-4698) at 1.

² Resolution W-4327, *Order Authorizing All Class B, C, and D Water Utilities to Establish Water Quality Memorandum Accounts (WRMA) for Recording the Expenses Resulting from Drinking Water Regulations, Including Water Sampling, Testing, Reporting, and Treatment Costs, and Office of Drinking Water (ODW) User Fee Memorandum Accounts (UFMA) to Track California Department of Health Services (DHS) User Fees Not Presently Included in Rates; and Authority to File Advice Letters for the Recovery of such Charges and Expenses* (Res. W-4327) at 2.

³ Res. W-4327 refers to the California Department of Health Service's Office of Drinking Water (DHS's ODW), the relevant responsibilities of which are now at the State Water Resources Control Board's Division of Drinking Water (Water Board's DDW).

⁴ Res. W-4327 at 3.

⁵ Res. W-4698 at 1. In the resolution, the Commission provides the same treatment for water quality compliance costs of Class B, C, and D water utilities, however Suburban does not seek to address water quality compliance costs in this advice letter.

⁶ *Id.* at 1-2 (footnote omitted).

in Preliminary Statement Z be converted to a “Drinking Water Fees Balancing Account” (DWFBA) with the same effective date issued for its AL 361-W (December 10, 2021).

Tier Designation and Effective Date

This advice letter is designated as a Tier 2 Advice Letter. Pursuant to Water Industry Rules 7.3.2(7) and 8.2 of GO 96-B with an effective date December 10, 2021.

Notice and Service

In compliance with General Order 96-B, Industry Rule 4.3, a copy of this advice letter has been mailed or electronically transmitted to all interested and affected parties as detailed in Attachment A.

Protest and Responses

Anyone may respond to or protest this advice letter. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter.

A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

- (1) The utility did not properly serve or give notice of the advice letter;
- (2) The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
- (3) The analysis, calculations, or data in the advice letter contain material error or omissions;
- (4) The relief requested in the advice letter is pending before the Commission in a formal proceeding; or
- (5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
- (6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require relitigating a prior order of the Commission.

A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

A response or protest must be made in writing or by electronic mail and must be received by the Water Division within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest or response is:

California Public Utilities Commission,
Water Division, 3rd floor
505 Van Ness Avenue, San Francisco, CA 94102
Email: water.division@cpuc.ca.gov

On the same date any protest or response is submitted to the Water Division, the respondent or protestant must serve a copy of the protest or response to:

Suburban Water Systems, Kiki Carlson, Regulatory Affairs Manager, 1325 N. Grand Ave., Suite 100, Covina, CA 91724-4044, and email kcarlson@swwc.com

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division, within the 20-day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

Replies: The utility shall reply to each protest and may reply to any response. Each reply must be received by Water Division within five business days after the end of the protest period and shall be served on the same day to the person who filed the protest or response to the advice letter.

This filing will not cause the withdrawal of service, nor conflict with other schedules or rules.

Sincerely,

/s/Kiki Carlson

Kiki Carlson
Regulatory Affairs Manager

SUBURBAN WATER SYSTEMS
Distribution List

Attachment A

Page 1 of 3

Director Of Public Works
City of Whittier
13230 E. Penn Street
Whittier, CA 90602

City Clerk
City of West Covina
1444 W. Garvey Ave. South
West Covina, CA 91790

City Attorney
City of Whittier
13230 E. Penn Street
Whittier, CA 90602

City Clerk
City of La Mirada
P.O. Box 828
La Mirada, CA 90638

Michael Gualtieri
La Habra Heights County Water District
P.O. Box 628
La Habra, CA 90633-0628

City Attorney
City of Baldwin Park
14406 E. Pacific Ave.
Baldwin Park, CA 91706

City Clerk
City of Industry
P.O. Box 3366
Industry, CA 91744

County Clerk
Orange County
10 Civic Center Plaza, 3rd. Floor
Santa Ana, CA 92701

City Clerk
City of Covina
125 East College Blvd.
Covina, CA 91723

City Attorney
City of Covina
125 East College Blvd.
Covina, CA 91723

Director of Public Works
City of Buena Park
6650 Beach Blvd.
Buena Park, CA 90621

City of Santa Fe Springs
Department of Public Works
11710 E. Telegraph Road
Santa Fe Springs, CA 90670

Bill Robinson
Upper San Gabriel Valley M.W.D.
1146 East Louisa Avenue
West Covina, CA 91790-1346

City Attorney
City of La Habra
P.O. Box 337
La Habra, CA 90633

City Attorney
City of West Covina
1444 West Garvey Ave. South
West Covina, CA 91790

City Clerk
City of Baldwin Park
14406 E. Pacific Ave.
Baldwin Park, CA 91706

The Prinden Corporation
P.O. Box 712
Park Ridge, NJ 07656-0712

Orchard Dale County Water District
13819 East Telegraph Road
Whittier, CA 90604

SUBURBAN WATER SYSTEMS

Distribution List

Page 2 of 3

City Attorney
City of La Mirada
P.O. Box 828
La Mirada, CA 90638

County Counsel
Orange County
10 Civic Center Plaza, 3rd. Floor
Santa Ana, CA 92701

City Clerk
City of Glendora
116 East Foothill Blvd.
Glendora, CA 91741

City Clerk
City of Walnut
P.O. Box 682
Walnut, CA 91788-0682

Jandy Macias, General Manager
Valley County Water District
JMacias@vcwd.org

Audrey F. Jackson
Golden State Water Company
AFJackson@gswater.com

Rowland Water District
gsanchez@rwd.org

California Domestic Water Company
lnoriega@caldomestic.com

City Clerk
City of La Habra
cc@lahabracagov

City of Azusa
Assistant Director – Water Operations
Jmacias@AzusaCa.Gov

County Clerk
Los Angeles County
12400 Imperial Hwy, Room 2001
Norwalk, CA 90650

City Clerk
City of La Puente
15900 East Main St.
La Puente, CA 91744

City Attorney
City of Glendora
116 East Foothill Blvd.
Glendora, CA 91741

City Attorney
City of Walnut
P.O. Box 682
Walnut, CA 91788-0682

Ed Jackson
Liberty Utilities
AdviceLetterService@LibertyUtilities.com

City Attorney
City of Industry
mvadon@bwslaw.com

Valencia Heights Water Co.
dmichalko@vhwc.org

Walnut Valley Water District
cfleming@wvwd.com

California Advocates Office Water Branch
California Public Utilities Commission
PublicAdvocatesWater@cpuc.ca.gov

City Clerk
City of La Puente
mtorres@lapuente.org

SUBURBAN WATER SYSTEMS
Distribution List

Page 3 of 3

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South Hills Country Club
2655 S. Citrus Street
West Covina, CA 91791
bdebie@southhillscountryclub.org

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Golden State Water Company
Regulatory Affairs Department
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San Dimas, CA 91709
RKMoore@gswater.com

Jeff Boand
O'Donnell Chevrolet - Buick
1312 Golden Vista Drive
West Covina, CA 91791
jboand007@aol.com

The Public Advocates Office
California Public Utilities Commission
Richard.Raushmeier@cpuc.ca.gov
Hani.Moussa@cpuc.ca.gov

PRELIMINARY STATEMENT
(Continued)

Z. Drinking Water Fees Balancing Account ("DWFBA") (T)

1. PURPOSE:

The purpose of the Drinking Water Fees Balancing Account (DWFBA) is to track (T)
the difference between all actual fees charged by the State Water Resources Control (T)
Board (State Water Board), and the fees authorized in rates. (T)

2. APPLICABILITY:

The DWFBA applies to all service areas.

3. ACCOUNTING PROCEDURE:

Suburban shall maintain the DWFBA by making the following entries at the end of (T)
each month:

- a. A debit entry shall be made to the DWFBA at the end of each month to record (T)
the difference between actual drinking water fees and adopted fees.
- b. Interest shall accrue to the DWFBA on a monthly basis by applying the interest (T)
rate equal to one-twelfth of the 3-month non-financial Commercial Paper Rate,
as reported in the Federal Reserve Statistical Release, to the average of the
beginning-of-month and the end-of-month balances.

4. DISPOSITION:

Prior to recovery, charges made to the DWFBA are subject to a reasonableness (T)
review. (T)

5. EFFECTIVE DATE:

The DWFBA shall go into effect on the effective date of Advice Letters 361-W, (T)
which is December 10, 2021. (T)

(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 395-W

Craig D. Gott

Date Filed _____

Name

Decision No. _____

President

Effective _____

Title

Resolution No. _____

Suburban Water Systems
1325 N. Grand Ave., Ste. 100
Covina, CA 91724-4044

Revised
Canceling Revised

Cal. P.U.C. Sheet No. 1945-W
Cal. P.U.C. Sheet No. 1943-W

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Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 395-W

Craig D. Gott

Date Filed _____

Name

Decision No. _____

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Effective _____

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Resolution No. _____

**CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS**

Advice Letter Cover Sheet

Utility Name: Suburban Water Systems **Date Mailed to Service List:** December 5, 2023
District: n/a
CPUC Utility #: U – 339-W **Protest Deadline (20th Day):** November 27, 2023
Advice Letter #: 395-W-A **Review Deadline (30th Day):** December 7, 2023
Tier: ☐ ☒ ☐ ☐
 1 2 3 Compliance **Requested Effective Date:** December 10, 2021
Authorization: General Order 96-B Rule 7.3.2(7) and 8.2
Rate Impact: n/a
Description: Supplemental to Advice Letter 395-W

The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list. Please see the "Response or Protest" section in the advice letter for more information.

Utility Contact: Kiki Carlson

Phone: (626) 543-2553

Email: kcarlson@swwc.com

Utility Contact: Carmelitha Bordelon

Phone: (626) 543-2547

Email: cbordelon@swwc.com

DWA Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

<u>DATE</u>	<u>STAFF</u>	<u>COMMENTS</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

[] APPROVED

[] WITHDRAWN

[] REJECTED

Signature: _____

Comments: _____

Date: _____



**Suburban
Water Systems**

A SouthWest Water Company

1325 N. Grand Ave. Ste. 100, Covina, CA 91724-4044

Phone: 626.543.2500, Fax: 626.331.4848

www.swwc.com

VIA EMAIL

U-339-W

ADVICE LETTER NO. 395-W-A

December 5, 2023

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Suburban Water Systems (Suburban) hereby transmits the following changes in tariff schedules applicable to its service area and which are attached hereto:

CPUC Sheet No.	Title of Sheet	Canceling CPUC Sheet No.
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1945-W	Table of Contents	1943-W

This filing is to supplement advice letter 395-W which was filed by Suburban on November 7, 2023, seeking an authorization to convert the previously approved Drinking Water Fees Memorandum Account (DWFMA) to Drinking Water Fees Balancing Account (DWFBA) which tracks all drinking water fees charged by the State Water Resources Control Board (State Water Board) that differ from the adopted drinking water fees in authorized rates.

On November 27, 2023, the Water Division requested Suburban to modify its proposed DWFBA. Accordingly, in this supplemental filing, Suburban proposes to close the DWFMA, and transfer the balance to DWFBA. The transferred amount for period December 10, 2021, through June 30, 2022, was included as part of Special Request No. 1 in Suburban's GRC Application (A.) 23-01-001 which was filed on January 3, 2023, and currently is still in progress. Nevertheless, Suburban's requested rate relief in its current GRC is not changed by this supplemental advice letter.

Furthermore, Suburban clarifies its disposition of the DWFBA to capture ordering paragraph three of Decision 06-04-037:

"Class A water utilities shall report on the status of their balancing accounts in their general rate cases and shall propose adjustments to their rates in that context to amortize under or over-collections in those accounts subject to reasonableness review. They also may propose such rate adjustments by advice letter at any time that the under- or overcollection in any such account exceeds two percent (2%) of annual revenues for the utility or a ratemaking district of the utility."

Tier Designation and Effective Date

This advice letter is designated as a Tier 2 Advice Letter. Pursuant to Water Industry Rules 7.3.2(7) and 8.2 of GO 96-B with an effective date December 10, 2021, the same effective date issued for Suburban's advice letter 361-W.

Notice and Service

In compliance with General Order 96-B, Industry Rule 4.3, a copy of this advice letter has been mailed or electronically transmitted to all interested and affected parties as detailed in Attachment A.

Protest and Responses

Anyone may respond to or protest this advice letter. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter.

A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

- (1) The utility did not properly serve or give notice of the advice letter;
- (2) The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
- (3) The analysis, calculations, or data in the advice letter contain material error or omissions;
- (4) The relief requested in the advice letter is pending before the Commission in a formal proceeding;
or
- (5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
- (6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require relitigating a prior order of the Commission.

A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

A response or protest must be made in writing or by electronic mail and must be received by the Water Division within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest or response is:

California Public Utilities Commission,
Water Division, 3rd floor
505 Van Ness Avenue, San Francisco, CA 94102
Email: water.division@cpuc.ca.gov

On the same date any protest or response is submitted to the Water Division, the respondent or protestant must serve a copy of the protest or response to:

Suburban Water Systems, Kiki Carlson, Regulatory Affairs Manager, 1325 N. Grand Ave., Suite 100, Covina, CA 91724-4044, and email kcarlson@swwc.com

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division, within the 20-day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

Replies: The utility shall reply to each protest and may reply to any response. Each reply must be received by Water Division within five business days after the end of the protest period and shall be served on the same day to the person who filed the protest or response to the advice letter.

This filing will not cause the withdrawal of service, nor conflict with other schedules or rules.

Sincerely,

/s/Kiki Carlson

Kiki Carlson
Regulatory Affairs Manager

SUBURBAN WATER SYSTEMS
Distribution List

Attachment A

Page 1 of 3

Director Of Public Works
City of Whittier
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Whittier, CA 90602

City Clerk
City of West Covina
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West Covina, CA 91790

City Attorney
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13230 E. Penn Street
Whittier, CA 90602

City Clerk
City of La Mirada
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La Mirada, CA 90638

Michael Gualtieri
La Habra Heights County Water District
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La Habra, CA 90633-0628

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Baldwin Park, CA 91706

City Clerk
City of Industry
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Industry, CA 91744

County Clerk
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Santa Ana, CA 92701

City Clerk
City of Covina
125 East College Blvd.
Covina, CA 91723

City Attorney
City of Covina
125 East College Blvd.
Covina, CA 91723

Director of Public Works
City of Buena Park
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Buena Park, CA 90621

City of Santa Fe Springs
Department of Public Works
11710 E. Telegraph Road
Santa Fe Springs, CA 90670

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The Prinden Corporation
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Park Ridge, NJ 07656-0712

Orchard Dale County Water District
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SUBURBAN WATER SYSTEMS

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Page 2 of 3

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Ed Jackson
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AdviceLetterService@LibertyUtilities.com

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Walnut Valley Water District
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California Advocates Office Water Branch
California Public Utilities Commission
PublicAdvocatesWater@cpuc.ca.gov

City Clerk
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SUBURBAN WATER SYSTEMS

Distribution List

Page 3 of 3

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The Public Advocates Office
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Hani.Moussa@cpuc.ca.gov

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Compton, CA 90220
ccornwell@comptoncity.org

PRELIMINARY STATEMENT
(Continued)

Z. Drinking Water Fees Balancing Account (DWFBA)

(D)

(N)

1. PURPOSE:

The purpose of the Drinking Water Fees Balancing Account (DWFBA) is to track the difference between all actual fees charged by the State Water Resources Control Board (State Water Board), and the fees authorized in rates.

2. APPLICABILITY:

The DWFBA applies to all service areas.

3. ACCOUNTING PROCEDURE:

The following entries shall be recorded to the balancing account:

- a. The DWFBA will track the difference between the annual drinking water fees charged by the State Water Board and the drinking water fees authorized in rates.
- b. Interest shall accrue to the DWFBA on a monthly basis by applying the interest rate equal to one-twelfth of the 3-month non-financial Commercial Paper Rate, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of-month and the end-of-month balances.

4. DISPOSITION:

Suburban shall report on the status of the balancing account in its general rate case and shall propose adjustments to their rates in the context to amortize under- or over-collections in the account subject to reasonableness review. Suburban also may propose such rate adjustments by advice letter at any time that the under- or over-collection in any such account exceeds two percent (2%) of annual revenues for the utility or a ratemaking district of the utility.

5. EFFECTIVE DATE:

The DWFBA shall go into effect on the effective date of Advice Letters 395-W-A, which is December 10, 2021.

(N)

(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 395-W-A

Craig D. Gott

Date Filed _____

Name

Decision No. _____

President

Effective _____

Title

Resolution No. _____

Suburban Water Systems
1325 N. Grand Ave., Ste. 100
Covina, CA 91724-4044

Revised
Canceling Revised

Cal. P.U.C. Sheet No. 1945-W
Cal. P.U.C. Sheet No. 1943-W

TABLE OF CONTENTS

<u>Subject Matter of Sheet</u>	<u>Cal. P.U.C. Sheet No.</u>	
Title Page	1903-W	
Table of Contents	1945-W, 1935-W, 1940-W	(T)
Preliminary Statement	1904-W, 1487-W, 1488-W, 1628-W – 1633-W, 1795-W 1635-W – 1637-W, 1882-W – 1883-W, 1640-W 1796-W – 1799-W, 1695-W, 1737-W, 1800-W, 1944-W, 1850-W, 1851-W, 1920-W, 1922-W, 1924-W, 1941-W – 1942-W	(T)
Service Area Maps:		
San Jose Hills Service Area – Tariff Areas	1340-W	
Whittier/La Mirada Service Area – Tariff Areas	1341-W	
Sativa Service Area	1905-W	
Rate Schedules:		
Schedule S-1, Sativa Service Area – General Unmetered Service	1926-W 1918-W	
Schedule SJ-1, San Jose Hills Service Area – Residential Metered Service	1885-W, 1892-W, 1838-W, 1871-W	
Schedule SJ-2, San Jose Hills Service Area – Non-Residential Metered Service	1886-W, 1893-W, 1839-W, 1872-W	
Schedule SJ-3, San Jose Hills Service Area – Recycled Water Metered Service	1887-W, 1894-W, 1840-W, 1831-W, 1873-W	
Schedule WLM-1, Whittier/La Mirada Service Area – Residential Metered Service	1888-W, 1895-W, 1841-W, 1874-W	
Schedule WLM-2, Whittier/La Mirada Service Area – Non-Residential Metered Service	1889-W, 1896-W, 1842-W, 1875-W	
Schedule No. LIC-1, San Jose Hills and Whittier/La Mirada Service Areas Low Income Credit	1897-W, 1844-W	
Schedule No. UF, P.U.C. Reimbursement Fee	1901-W	
Schedule No. 4, Private Fire Protection Service	1890-W, 1422-W, 823-W	
Schedule No. 4A, Fire Hydrant Service on Private Property	1891-W, 1766-W, 1824-W	
Schedule No. 5, Public Fire Protection Service	880-W	
Schedule No. 9-CF, Construction and Tank Truck Service	881-W	
Schedule No. 14.1, Water Shortage Contingency Plan	1854-W – 1860-W	
Schedule No. FF, Fire Flow Testing Charge	1349-W	
Summary List of Contracts and Deviations	960-W	
Rules:		
No. 1 Definitions	1698-W, 1699-W	
No. 2 Description of Service	884-W	
No. 3 Application for Service	885-W, 1108-W	
No. 4 Contracts	887-W	

(Continued)

(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 395-W

Craig D. Gott

Date Filed _____

Name

Decision No. _____

President

Effective _____

Title

Resolution No. _____