



## **GREAT OAKS WATER COMPANY**

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October 10, 2018

California Public Utilities Commission  
Water Division  
Room 3102  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

**Advice Letter 279-W  
Great Oaks Water Company (U-162-W) to the California Public Utilities  
Compliance with D.19-09-010  
Notice of Completion of Cross Connection Control Program**

Great Oaks Water Company (Great Oaks) transmits this Tier 1 advice letter filing showing compliance with California Public Utilities Commission (Commission) Decision (D.) 19-09-010.

**Compliance with D.19-09-010.**

In the Settlement Agreement of Great Oaks' most recent general rate case application (Application 18-07-002), Great Oaks agreed to "complete the update and revision to its cross-connection control plan within ninety (90) days of a final decision in this proceeding and provide the complete plan to the Public Advocates Office and to the Commission through a Tier 1 advice letter filing."<sup>1</sup> D.19-09-010 adopted the Settlement Agreement.

Great Oaks completed its Cross Connection Control Program as required. A copy of the completed Cross Connection Control Program is attached hereto as Exhibit A. A copy of

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<sup>1</sup> Settlement Agreement Between the Public Advocates Office

this advice letter, with the completed Cross Connection Control Program, is being served upon the Public Advocates Office. This advice letter filing is in compliance with the Settlement Agreement and D.19-09-010.

#### No Effect on Water Service

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

#### Tier Designation

This is a Tier 1 Advice Letter pursuant to General Order 96-B and Water Industry Rule 7.3.1(3) (Compliance with mandatory statute, decision, or resolution).

#### Notice and Service

As this Advice Letter is for compliance with D.19-09-010, no additional notice to customers is required. The Advice Letter is being published on Great Oaks' website and is being served upon the Distribution List provided below.

#### Protests and Responses

Anyone may protest and respond to 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 specific grounds on which it is based. These grounds may be based upon the following:

- (1) The utility did not properly serve or give notice of the Advice Letter; or
- (2) The relief requested in the Advice Letter would violate a statute or Commission order, or is not authorized by statute or Commission order on which the utility relies; or
- (3) The analysis, calculations, or data in the Advice Letter contain material error or omissions; or
- (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 re-litigating a prior order of the Commission).

Any Protest or Response must be made in writing or by electronic mail and must be received by the Water Division of the Commission within 20 days of the date this Advice Letter is filed. The Advice Letter process does not provide for any Protests, Responses or other comments, except for a reply by Great Oaks, after the 20-day comment period expires. The address for mailing or delivering a Protest or Response is:

Tariff Unit, Water Division, 3rd floor  
California Public Utilities Commission,  
505 Van Ness Avenue, San Francisco, CA 94102  
water\_division@cpuc.ca.gov

On the same date any Protest or Response is submitted to the Water Division, the protesting or responding person, entity or party must serve a copy of the Protest or Response on Great Oaks addressed to Timothy S. Guster, Great Oaks Water Co., PO Box 23490, San Jose, CA 95153, 408-227-9540, 408 227-7126 (fax), email: tguster@greatoakswater.com.

Great Oaks Water Company

/s/

Timothy S. Guster  
General Counsel  
Legal and Regulatory Affairs



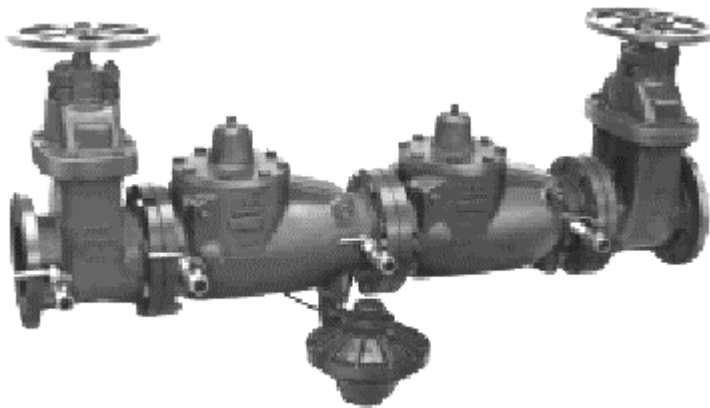
Great Oaks Water Company  
Advice Letter 279-W

**Exhibit A**  
Cross Connection Control Program



# **GREAT OAKS WATER COMPANY**

## **Cross Connection Control Program**



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## **1.0 PURPOSE**

The purpose of this document is to describe the Cross Connection Control Program (CCCP) implemented by the Great Oaks Water Co (GOWC) to protect the public water supply against actual or potential contamination through cross connection and backflow.

## **2.0 SCOPE**

The scope of the Cross Connection Control Program includes all of the elements necessary to ensure compliance with the California Code of Regulations, Title 17, Public Health Sections 7583 through 7605. The scope of the program encompasses the administration of employee training to meet state requirements, the surveying of industrial and commercial properties for potential cross-connection hazards, designation of appropriate backflow prevention, testing of devices, maintenance of records and overall program administration.

## **3.0 DEFINITIONS**

The following definitions describe those terms and phrases that are pertinent to the various elements of a cross connection control program:

### **3.1 Air-Gap Separation**

The term "air-gap separation" shall mean a physical break between the free flowing discharge end of a potable water supply pipeline and an open or non-pressure receiving vessel. An "approved air-gap separation" shall be at least double the diameter of the supply pipe measured vertically above the overflow rim of the vessel, in no case less than 1 inch.

### **3.2 Approved Backflow Prevention Assembly**

The term "Approved Backflow Prevention Assembly" shall mean assemblies which have passed laboratory and field evaluation tests performed by a recognized testing organization which has demonstrated their competency to perform such tests to the California Department of Public Health (DOPH).

### **3.3 Approved Water Supply**

The term "approved water supply" means any local water supply whose potability is regulated by a State or Local health agency.

### **3.4 Auxiliary Water Supply**

The term "auxiliary water supply" means any water supply on or available to the premises other than the approved water supply as delivered by the water purveyor to the service connection.



### 3.5 AWWA Standard

The term "AWWA Standard" means an official standard developed and approved by the American Water Works Association (AWWA).

### 3.6 Backflow

The term "backflow" shall mean a flow condition, caused by a differential in pressure, that causes the flow of water or other liquid, gases, mixtures or substances into the distributing pipes of a potable supply of water from any source or sources other than an approved water supply source. Back siphonage is one cause of backflow. Back pressure is the other cause.

### 3.7 Confined Space

Means a space that:

1. Is large enough and so configured that an employee can bodily enter and perform assigned work; and
2. Has limited or restricted means for entry or exit (for example, tanks vessels, silos, storage bins, hoppers, vaults and pits are spaces that may have limited means of entry.); and
3. Is not designed for continuous employee occupancy.

This definition is given because backflow assemblies are often found in these types of spaces.

### 3.8 Consumer of Record:

The consumer of record is the person, business, or owners that have applied for service from GOWC. This may be, but is not limited to, the tenant, landlord, resident, business, or property owner.

### 3.9 Contamination

The term "contamination" means a degradation of the quality of the potable water by any foreign substance which creates a hazard to the public health, or which may impair the usefulness or quality of the water.

### 3.10 Pollution

The term "pollution" shall mean an impairment of the quality of the water to a degree which does not create a hazard to the public health, but, which does adversely and unreasonably affect the aesthetic qualities of such waters for domestic use.

### 3.11 Cross-Connection

The term "cross-connection" as used in this document means any unprotected actual or potential connection between a potable water system used to supply water for drinking purposes and any source or system containing unapproved water or a substance that is not or cannot be approved as safe, wholesome, and potable. By-pass arrangements, jumper connections, removable sections, swivel or changeover devices, or other devices through which backflow could occur, shall be considered to be cross-connections.

### 3.12 Double Check Valve Assembly

The term “double check valve assembly” means an assembly of at least two independently acting check valves including tightly closing, resilient seated, shutoff valves on each side of the check valve assembly and test cocks available for testing the water tightness of each check valve.

### 3.13 Health Agency

The term “health agency” means the California Department of Public Health, or the local health agency with respect to a small water system.

### 3.14 Local Health Agency

The term “local health agency” means the County of Santa Clara, Department of Environmental Health Services.

### 3.15 Person

The term “person” means an individual, corporation, company, association, partnership, municipality, public utility, or other public body or institution.

### 3.16 Premises

The term “premises” means any and all areas on a water user’s property which are served or have the potential to be served by the public water system.

### 3.17 Public Water System

The term “public water system” means a system for the provision of pipe water to the public for human consumption that has five or more service connections or regularly serves an average of 25 individuals daily at least 60 days out of the year.

### 3.18 Reclaimed Water

The term “reclaimed water” means a wastewater which, as a result of treatment, is suitable for uses other than direct potable use.

### 3.19 Reduced Pressure Principle Backflow Prevention Assembly

The term “reduced pressure principle backflow prevention assembly” means an assembly incorporating two or more check valves and an automatically operating differential relief valve located between the two checks, a tightly closing, resilient seated, shut-off valve on each side of the check valve assembly, and equipped with the necessary test cocks for testing.

### 3.20 Service Connection

The term “service connection” refers to the point of connection of a user’s piping to the water supplier’s facilities.

### 3.21 Water Supplier

The term "water supplier" means the person who owns or operates the approved water supply system.

### 3.22 Water User

The term "water user" means any person obtaining water from an approved water supply system.

## **4.0 ADMINISTRATION OF PROGRAM**

### 4.1 Authority

Great Oaks Water Co. being an investor owned utility is not in a position to draft ordinance with respect to cross connection control. The authority for the program comes from State of California, Title 17 sections 7583 through 7605; State of California, Public Utilities Commission Rule 16c; and State of California, DOPH.

### 4.2 Chain of Command

The administrative chain of command for the CCCP at Great Oaks Water is:

Chairman: John Roeder  
Program Administrator: Lorenzo Arce  
Water Quality Specialist: Mike Carey  
Department phone number: (408) 227-9540

### 4.3 New Construction

All applications for new services and enlarging of existing services shall be routed through the Program Administrator. Based upon the information submitted, the decision shall be made if a backflow assembly is required, and if so, which of the listed types of backflow prevention assemblies is required:

1. Air-Gap Separation
2. Double Check Valve Assembly
3. Reduced Pressure Principle Assembly

When it is determined that one of the three backflow prevention assemblies is required, an agreement shall be drafted informing the applicant that the installation is a condition of service. In addition, a list of approved backflow prevention assemblies, and a schematic of the typical installation of the required backflow prevention assembly shall be sent to the consumer.

When the new service line is installed it shall be locked off and no service shall be provided until installation of the backflow prevention assembly is complete. Upon installation and initial testing of the backflow prevention assembly, GOWC shall inspect the installation, and provide water service.

## 4.4 Existing Consumers

When it is determined by the survey of a cross connection specialist that an actual or potential cross connection or backflow condition is present in an existing facility, the installation of an approved backflow prevention assembly commensurate with the actual or potential hazard shall be required.

A series of four letters to the consumer of record shall begin outlining the results of the survey, and the actions needed to comply with the GOWC CCCP. The first letter shall provide information as to the type of backflow prevention assembly needed, a list of approved assemblies, a schematic of the installation, and a list of companies that do this type of work in the area. The remaining three letters shall be reminders sequentially leading up to possible termination of service for non-compliance. Should an existing backflow assembly be in place that does not meet GOWC installation requirements, or is not commensurate with the degree of hazard found on site, the device shall be repaired or upgraded as required by GOWC.

## 5.0 SURVEYS

### 5.1 Identification of Survey Candidates

Great Oaks Water Company has determined specific industries that may pose an actual or potential backflow hazard to the public water supply. These industries are identified from lists of industries where cross-connections are likely to be found, as provided by the State of California<sup>1</sup>, and the University of Southern California, Foundation for Cross Connection Control and Hydraulic Research<sup>2</sup>. From these lists, specific consumers in the GOWC service area shall be identified by directories, mailing lists, associations, & business licenses.

### 5.2 Survey

When possible, a request to survey the premises shall be made and a date and time agreed upon. Should the request to survey be denied, letters shall be sent directing installation of the appropriate backflow assembly based on knowledge of the specific industry. During the survey many factors are considered to determine if the consumer is or could be a potential hazard to the public water supply.

These include:

1. Sources of water on site.
2. Types of water on site.
3. Uses of water on site.
4. Types of water using equipment.
5. Condition of water using equipment.
6. Complexity of plumbing on site, and the potential for alterations of that system.
7. Storage and use of hazardous materials on site.

<sup>1</sup> State of California, Health and Welfare Agency, Department of Health Services, Guidance Manual for Cross Connection Control Programs, September 1988, Public Water Supply Branch, Chapter IV. Survey and Evaluation of Hazards, Paragraph B. Prioritizing Surveys, Page IV-1.

<sup>2</sup> Foundation for Cross-Connection Control and Hydraulic Research, University of Southern California, Manual of Cross-Connection Control Tenth Edition, 2009, Chapter 6 Typical Facilities: Cross-Connections or Water Uses Which May Endanger the Public Water System, Page 117-128

## 5.2 Survey (continued)

All the factors found and recorded during the survey shall be considered in the determination of backflow prevention requirements. Each consumer requiring a backflow prevention assembly shall be notified by letter. The consumer shall be informed of their responsibility to provide backflow protection and the type of backflow assembly required in accordance with Title 17 of the California Administrative Code. Should it be determined that the consumer does not require a backflow prevention device, they shall be notified in person that no such assembly is required at this time.

## **6.0 INSTALLATION OF BACKFLOW ASSEMBLIES**

Backflow prevention assemblies shall be installed in accordance with section 7603, Title 17 of the California Administrative Code and GOWC's approved schematics, any deviation from these drawings shall have GOWC approval.

### 6.1 Air-Gap Separation (AG)

The Air-gap separation shall be located as close as practical to the user's connection and all piping between the user's connection and the receiving tank shall be entirely visible unless otherwise approved by GOWC.

### 6.2 Double Check Valve Assembly (DC)

A double check valve assembly shall be located directly behind the meter and shall be installed a minimum of twelve inches (12") above grade and not more than thirty-six inches (36") above grade in a manner where it is readily accessible for testing and maintenance unless otherwise approved by GOWC.

### 6.3 Reduced Pressure Principle Backflow Prevention Assembly (RPP)

A Reduced pressure principle backflow prevention assembly shall be located directly behind the meter and shall be installed a minimum of twelve inches (12") above grade and not more than thirty-six inches (36") above grade measured from the bottom of the device and with a minimum of twelve inches (12") side clearance in a manner where the assembly is readily accessible for testing and maintenance unless otherwise approved by the GOWC. In no case shall a cut, tee, or tap be made between the user's meter and the backflow prevention assembly.

Any deviation of installation from the diagrams and descriptions provided, shall have approval of GOWC prior to installation. All backflow prevention assembly installations shall be inspected by GOWC to ensure compliance with the requirements of the State of California, DOPH and GOWC.

## **7.0 TESTING**

### 7.1 Frequency of Testing

All backflow prevention assemblies shall be tested at least annually, and immediately after installation, relocation, or repair, by an AWWA certified test person in accordance with Title 17 of the California Administrative Code.

## 7.2 Responsibility for Testing

As per Title 17 of the California Administrative Code the consumer of record is responsible for the installation, testing, and maintenance of the backflow prevention assembly. However, GOWC shall attempt to provide a courtesy notice when possible.

## 7.3 Contract Testing

If the consumer of record:

1. Does not give permission for a shut down, or
  2. Denies access to the device, or
  3. Prefers to have its own certified tester, or if the
  4. Device is in an unsafe location (i.e. confined space)
- then letters shall be sent requesting the consumer contract a certified tester, at their own expense, and direct the results be sent to GOWC.

## 7.4 Failure of Backflow Assembly

Should an existing assembly fail the annual test, a series of letters shall be sent directing the consumer to contract an outside repair person and have the assembly repaired and tested. The passing results are to be directed to GOWC to clear the account and avoid termination of service.

## 7.5 Enclosures

GOWC shall supply each affected consumer of record with a list of persons on file with GOWC and certified by AWWA to test backflow prevention assemblies, and the list of State of California approved backflow prevention assemblies.

## 7.6 Procedures for Testing and Inspection

GOWC has accepted the certification and procedures of the AWWA. These procedures have been adopted from the USC Foundation for Cross-Connection Control and Hydraulic Research, "Manual of Cross Connection Control" Tenth Edition.

## **8.0 TERMINATION OF SERVICE**

### 8.1 Basis for Termination

When GOWC encounters a water use that represents a clear and immediate hazard to the potable water supply that cannot be immediately abated, GOWC shall initiate the procedure for discontinuing water service. Conditions or water uses that create a basis for water termination shall include, but are not limited to, the following items:

1. Refusal to install a required backflow prevention assembly.
2. Refusal to test a backflow prevention assembly.
3. Refusal to repair a faulty backflow prevention assembly.
4. Refusal to upgrade a backflow prevention assembly to the necessary level of protection.
5. A situation which presents an immediate health hazard to the public water system.

## 8.2 Service Termination Procedures

For condition 1, 2, 3, 4, or 5 outlined above, GOWC shall terminate service to a consumer's premises after four (4) written notices have been sent specifying the corrective action needed and the time period in which it must be done.

The first notice is an information letter which outlines the requirements and a specific period of time to comply (30 days). If no response is received in the specified time period, a second letter will be sent.

The second notice gives a 15 day period to comply. Also, the consumer is notified that water service will be terminated if no response is received after a specific period of time.

The third (or final) notice gives the consumer an additional 10 days to comply and restates the consequences of not complying.

The fourth (or termination) notice gives the consumer another 10 days to comply and sets the actual date that service will be terminated.

For condition "5" Great Oaks Water Company shall take the following steps:

1. Make a reasonable effort to advise the water user of intent to terminate water service.
2. Attempt to contact the responsible party listed on the account by telephone and follow-up letter and also notify the Santa Clara County Department of Public Health.
3. Terminate water supply and lock service valve. The water service will remain inactive until corrective action is taken or a backflow prevention assembly is installed.

## 9.0 REPORTING

All reporting required by the CCCP at GOWC shall be the responsibility of the Program Administrator. This includes any reports to local, state, and federal regulatory or health agencies such as:

1. Annual Report to the State Water Resources Control Board Division of Drinking Water
2. Copies of all Termination Letters to the Santa Clara County Department of Public Health.

## 10.0 MAINTENANCE OF RECORDS

### 10.1 Assembly Records

Records of assembly type, size, manufacturer, installation date, location, account number, consumer of record, and repair history shall be kept electronically.

### 10.2 Testing Records

Test results on all assemblies shall be kept electronically.

### 10.3 Life of Records

Assembly records shall be kept for the life of the assembly.