



## **GREAT OAKS WATER COMPANY**

P.O. Box 23490  
San Jose, CA 95153  
(408) 227-9540  
tguster@greatoakswater.com

January 15, 2020

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

**Advice Letter 284-W  
Great Oaks Water Company (U-162-W) to the California Public Utilities  
Information Only**

Great Oaks Water Company (Great Oaks) transmits this Tier 1 “information-only” advice letter to advise that Great Oaks, under the authority of California Public Utilities Commission (Commission) Decision (D.) 19-09-010, has “amortized” the balance in its Monterey-Style Water Revenue Adjustment Mechanism (WRAM) Account, as more specifically described below.

Information on Action and Authority

On November 18, 2019, Great Oaks filed its Advice Letter 280-W requesting amortization of an under-collected balance in its authorized Monterey-Style WRAM Account. Shortly thereafter, Great Oaks and Water Division staff engaged in discussions regarding policies and procedures pertaining to the amortization of authorized Monterey-Style WRAM accounts and of authorized balancing accounts, in general.

No protest was filed with respect to Advice Letter 280-W. On December 10, 2019, a meeting was held at the Water Division to discuss Advice Letter 280-W. James Boothe and Tayeb Mogri attended on behalf of the Water Division. Ana Maria Johnson and Richard Rauschmeier attended on behalf of the Public Advocates Office. The

undersigned attended for Great Oaks. During the meeting, the attendees discussed whether it was appropriate for Great Oaks to recover the balance requested for amortization in Advice Letter 280-W from excess usage surcharge funds remaining in Great Oaks' Conservation Lost Revenue and Expense Memorandum Account under the authority of Commission Decision 19-09-010, which provides in pertinent part:

With respect to the second memorandum account that CalAdvocates initially recommended fully amortizing during the course of this rate case cycle, the Conservation Lost Revenue and Expense Memorandum Account, the Parties agreed that Great Oaks should fully amortize the balance in that account (\$2,624,254), by taking into income, on or after January 1, 2020, that same amount from Excess Usage Surcharges collected during the period of time that emergency drought allocations were in effect and then close the account after a final decision in this proceeding, provided no further drought emergencies occur in the interim. The Parties further agreed that if there are any funds remaining in the Conservation Lost Revenue account at the point in time when it is closed, those funds may be used to amortize under-collected balances in other balancing or memorandum accounts during this three-year rate cycle. If any further funds remain thereafter, Great Oaks will use them as a deduction from authorized revenues in rate case year 2022 – 2023.<sup>1</sup>

As of December 31, 2019, there was a balance of \$3,391,714.66 in excess usage surcharges associated with the Conservation Lost Revenue and Expense Memorandum Account. In January 2020, Great Oaks took into income the \$2,624,254 in conservation lost revenues, as authorized in D.19-09-010, leaving a balance of \$767,460.66 of excess usage surcharges.

This Advice Letter 284-W is to notify the Commission that Great Oaks has now “amortized” the amount originally requested in Advice Letter 280-W (\$603,252.49) from the remaining balance of excess usage surcharges, as specifically authorized in D.19-09-010. The amount “amortized” includes the under-collected balance in Great Oaks' Monterey-Style WRAM Account through September 25, 2019 (\$548,066.19), plus the prior under-collected balance from the Advice Letter 265-W amortization of the same account (\$55,186.30). No protests were filed with respect to Advice Letter 280-W.

This action is completely consistent with the information provided in Great Oaks' December 18, 2019 letter to the Commission's Water Division withdrawing Great Oaks' Advice Letter 280-W.

Following the “amortization” of the Monterey-Style WRAM Accounts described above, the remaining balance of excess usage surcharges is \$164,208.17, which is available for amortization of under-collected balances in authorized balancing or memorandum accounts during the three-year period from July 1, 2019 through June 30, 2022, per D.19-09-010.

<sup>1</sup> D.19-09-010, pages 17 – 18 (footnotes omitted).

### No Effect on Water Service

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

### Other Advice Letters Pending

As of the date of filing, Great Oaks Advice Letters 281-W (suspended) and 283-W are pending. Advice Letter 282-W was an information-only filing requiring no action by the Commission.

### Tier Designation

This is a Tier 1 “Information-Only” 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

Certificate of Service

I hereby certify that I have this day served a copy of Great Oaks Water Co.'s Advice Letter 284-W on the parties listed on the following Distribution List by mailing a properly addressed copy by first class mail with postage prepaid or by email to those marked with an asterisk (\*).

Executed on January 15, 2020 at San Jose, California.

\_\_\_\_\_/s/\_\_\_\_\_  
Timothy S. Guster

Great Oaks Water Co.  
Distribution List

Municipal Water System  
City of San Jose  
3025 Tuers Road  
San Jose, CA 95121

County Clerk  
County of Santa Clara  
70 W. Hedding Street  
San Jose, CA 95110

Safe Drinking Water Office  
Department of Water Resources  
1416 9<sup>th</sup> Street, Room 804  
Sacramento, CA 95814

Office of Regulatory Affairs\*  
California Water Service Company  
1720 North First Street  
San Jose, CA 95112

Santa Clara Valley Water District  
5750 Almaden Expressway  
San Jose, CA 95118

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

Richard Rauschmeier\*  
Division of Ratepayer Advocates  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Regulatory Affairs  
San Jose Water Company  
110 West Taylor Street  
San Jose, CA 95110

Legal Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214