



GREAT OAKS WATER COMPANY

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January 5, 2021

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

**Advice Letter 294-W
Great Oaks Water Company (U-162-W)
To the California Public Utilities Commission**

Great Oaks Water Company (Great Oaks) submits this supplemental Tier 1 advice letter filing requesting the implementation of a surcharge to amortize the balance in Great Oaks' Monterey-Style Water Revenue Adjustment Mechanism Account (WRAM Account). The following tariff sheets implementing this surcharge are attached to this advice letter:

| CPUC Sheet Number | Title | Canceling |
|-------------------|---|-----------|
| 946-W | Schedule No. 1 GENERAL METERED SERVICE SPECIAL CONDITIONS | 944-W |
| 947-W | TABLE OF CONTENTS | 945-W |

Summary and Request for Authorization to Impose Surcharge

Decision (D.) 10-11-034 authorized Great Oaks to establish a WRAM Account to track the difference between revenue Great Oaks receives for actual metered sales through tiered rates and revenue Great Oaks would have received through the uniform, single-quantity rates if such rates had been in effect.

Pursuant to Ordering Paragraph 9 of D.10-11-034, Great Oaks filed Advice Letter 202-W to establish the WRAM Account, and the Commission approved the WRAM Account effective March 8, 2011. Tariff sheets for the WRAM Account were last revised and updated, effective November 20, 2015, pursuant to Great Oaks' Advice Letter 248-W.

On multiple prior occasions, Great Oaks has amortized the balance in this WRAM account. Great Oaks' Advice Letter 223-W was approved by the Commission with an effective date of May 13, 2012. Supplemental Advice Letter 229-W-A was approved by the Commission with an effective date of January 15, 2013. Advice Letter 242-W was approved by the Commission with an effective date of September 2, 2014. Advice Letter 251-W was approved by the Commission with an effective date of January 19, 2016. Advice Letter 265-W was approved by the Commission with an effective date of August 3, 2017. Advice Letter 290-W was approved by the Commission to amortize the balance in the WRAM account with an effective date of July 21, 2020.

Most recently, the Commission authorized Great Oaks to amortize the balance in the WRAM account by approving Advice Letter 293-W-A (effective November 24, 2020), which employed the same methodology utilized in this Advice Letter 294-W.

The current balance in the WRAM Account is \$465,739.02. See attached Advice Letter 294-W Exhibit A Workpapers.¹ The time period covered by the WRAM Account is from September 28, 2020 through December 21, 2020. The supporting calculations in the workpapers provides a week-by-week summary of the difference between the revenue Great Oaks actually received through quantity charges from Single-Family Residential Customers and what Great Oaks would have received from those same customers under uniform quantity charges for the time periods specified in the authorized WRAM Account.

The amount to be amortized through this Advice Letter, \$465,739.02, represents 2.2% of Great Oaks' total revenue requirement (\$20,836,321²) for the current rate year. Pursuant to D.10-11-034, Great Oaks is authorized to recover the balance in the WRAM Account through a surcharge only on Single-Family Residential Customers.

Adopted water sales for single-family residential customers for the July 1, 2020 to June 30, 2021 rate year are 2,367,852 ccf.³ The surcharge to amortize the combined WRAM balances calculates to \$0.1967 per ccf ($\$465,739.02/2,367,852$).

¹ Data supporting the information in the Workpapers is available upon request. The data will consist of billing entries for the time period covered by this Advice Letter.

² The total revenue requirement for the current rate year was authorized through D.19-09-010.

³ D.19-09-010.

Great Oaks requests authority to implement this surcharge on all water delivered to single-family residential customers for a twelve-month period beginning February 9, 2021.

All Single-Family Residential Customers will be subject to the surcharge for a twelve-month period. With the surcharge, the average bi-monthly bill for a Single-Family Residential Customers with a 3/4" x 3/4" meter using 10 ccf of water per month will increase by 3.8% from \$109.63 to \$113.82, as shown below.

Bill Comparison

| Current Charges | | | Post AL 294-W Charges | | |
|-----------------|---------------|----------|-----------------------|---------------|----------|
| Service Charge | 2 X \$22.36 | \$44.72 | Service Charge | 2 X \$22.36 | \$44.72 |
| 0 – 6 ccf | 6 X \$1.3024 | 7.81 | 0 – 6 ccf | 6 X \$1.3024 | 7.81 |
| 7 - 20 ccf | 14 X \$2.6048 | 36.47 | 7 - 20 ccf | 14 X \$2.6048 | 36.47 |
| LICAP Srch | 20 X \$0.0734 | 1.47 | LICAP Srch | 20 X \$0.0734 | 1.47 |
| LICAP Srch 2 | 20 X \$0.0837 | 1.67 | LICAP Srch 2 | 20 X \$0.0837 | 1.67 |
| AL 290-W Srch | 20 X \$0.2716 | 5.43 | AL 290-W Srch | 20 X \$0.2716 | 5.43 |
| AL 293-W-A Srch | 20 X \$0.2686 | 5.37 | AL 293-W-A Srch | 20 X \$0.2686 | 5.37 |
| | | | AL 294-W Srch | 20 X \$0.1967 | 3.93 |
| Sub-Total | | \$102.94 | | | \$106.87 |
| PUCURA Fee | 1.43% | 1.47 | PUCURA Fee | 1.43% | 1.53 |
| Sub-Total | | \$104.41 | Sub-Total | | \$108.40 |
| San Jose Tax | 5.0% | 5.22 | San Jose Tax | 5% | 5.42 |
| Total | | \$109.63 | Total | | \$113.82 |

Tier Designation

Pursuant to General Order 96-B and Water Industry Rule 8.5, this is a Tier 1 advice letter seeking the amortization of balancing or balancing-type accounts.

Requested Effective Date

Great Oaks requests that tariff sheets authorized through this Advice Letter 294-W be effective as of February 9, 2021.

Notice

Great Oaks published notice of Advice Letter 294-W in the San Jose Mercury News, a newspaper of local circulation, pursuant to General Order 96-B, Water Industry Rule 3.1. A copy of the published notice will be provided to the Water Division as soon as it is available.

Response or Protest

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 Commission's Division of Water and Audits 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, Division of Water and Audits, 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
Telephone: (408) 227-9540
Facsimile: (408) 227-7126
Email: tguster@greatoakswater.com

Great Oaks Water Company

/s/

Timothy S. Guster
General Counsel
Legal and Regulatory Affairs

cc: Syreeta Gibbs, Cal Advocates (via email)
Isaac Gendler, Cal Advocates (via email)

VERIFICATION

I am an officer of the Great Oaks Water Company and am authorized to make this verification on its behalf. The statements in the foregoing document, Great Oaks Water Co.'s Advice Letter 294-W, are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 5, 2021 at San Jose, California.

/s/
Timothy S. Guster

Certificate of Service

I hereby certify that I have this day served a copy of Great Oaks Water Co.'s Advice Letter 294-W on the parties listed on the following Distribution List by email (indicated with *) or by mailing a properly addressed copy by first class mail with postage prepaid. Exhibits are available upon request.

Executed on January 5, 2021 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 9th Street, Room 804
Sacramento, CA 95814

Office of Regulatory Affairs*
California Water Service Company
1720 North First Street
San Jose, CA 95112
(via email to rateshelp@calwater.com)

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

Water Division*
California Public Utilities
Commission
505 Van Ness Avenue
San Francisco, CA 94102

Richard Rauschmeier*
Cal Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Syreeta Gibbs*
Cal Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

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

Regulatory Affairs*
San Jose Water Company
110 West Taylor Street
San Jose, CA 95156

Schedule No. 1
GENERAL METERED SERVICE
(Continued)

SPECIAL CONDITIONS

1. All bills are subject to the reimbursement fee set forth in Schedule No. UF.
2. To provide ongoing funding for the Utility’s Low-Income Customer Assistance Program (LICAP), as described in Tariff Rule 22, a surcharge of \$0.0734 will be added to the Quantity Charge for all water delivered to non-LICAP participants on and after July 1, 2019.
3. To amortize the balance in the Utility’s Low Income Customer Assistance Program (LICAP) balancing accounts, a surcharge of \$0.0837 will be added to the Quantity Charge for all non-LICAP customers for all water delivered beginning February 18, 2020, for a twelve-month period.
4. To amortize the balance in the Utility’s Monterey-Style WRAM account, a surcharge of \$0.2716 will be added to the Quantity Charge for all single-family residential customers for a period of two years beginning July 21, 2020. (D)
5. To amortize the balance in the Utility’s Monterey-Style WRAM account, a surcharge of \$0.2686 will be added to the Quantity Charge for all single-family residential customers for a period of twelve months beginning November 24, 2020.
6. To amortize the balance in the Utility’s Monterey-Style WRAM account, a surcharge of \$0.1967 will be added to the Quantity Charge for all single-family residential customers for a period of twelve months beginning February 9, 2021. (N)
|
(N)

(To be inserted by utility)

Issued by

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

Advice Letter No. 294-W

Timothy S. Guster
NAME

Date Filed _____

Decision No D.19-09-010; D.10-11-034 General Counsel
TITLE

Effective _____

Resolution No. _____

TABLE OF CONTENTS

The following listed tariff sheets contain all effective rates and rules affecting the charges and service of the utility, together with other pertinent information.

| <u>Subject Matter of Sheet</u> | <u>Cal. P.U.C. Sheet No.</u> |
|---|---|
| Title Page | 346-W |
| Table of Contents | 947-W, 354-W (C) |
| Preliminary Statement | 347-W, 348-W, 465-W, 466-W, 785-W, 876-W, 742-W, 743-W 783-W, 794-W, 795-W, 837-W, 841-W, 850-W, 885-W, 887-W, 936-W |
| Service Area Map | 644-W to 670-W |
| Rate Schedules: | |
| Schedule No. 1, General Metered Service | 877-W, 878-W, 946-W (C) |
| Schedule No. 3M, Irrigation Service | 880-W, 934-W |
| Schedule No. 4, Private Fire Protection Service | 882-W |
| Schedule No. 5, Public Fire Hydrant Service | 3-W |
| Schedule No. 6, Contract Resale Service | 883-W, 884-W |
| Schedule No. 9C, Construction Flat Rate Service | 817-W, 818-W |
| Schedule No. 14.1 Mandatory Water Conservation | 768-W, 814-W, 815-W, 771-W, 772-W, 773-W |
| Schedule UF, Surcharge to Fund Public Utilities Commission Reimbursement Fee | 940-W |
| Summary List of Contracts & Deviations | 477-W |
| Rules: | |
| No. 1 Definitions | 917-W, 918-W |
| No. 2 Description of Services | 191-W |
| No. 3 Application for Service | 10-W, 503-W, 600-W |
| No. 4 Contracts | 11-W |
| No. 5 Special Information Required on Forms | 919-W - 921-W |
| No. 6 Establishment and Re-establishment of Credit | 14-W |
| No. 7 Deposits | 601-W, 602-W |
| No. 8 Notices | 922-W, 923-W, 900-W |
| No. 9 Rendering and Payment of Bills | 18-W, 19-W, 598-W, 787-W |
| No. 10 Disputed Bills | 924-W, 902-W |
| No. 11 Discontinuance and Restoration of Service | 903-W – 904-W, 925-W- 927-W, 910-W, 911-W 928-W |
| No. 12 Information Available to Public | 25-W, 26-W |
| No. 13 Temporary Service | 27-W, 28-W |
| No. 14 Continuity of Service | 29-W |
| No. 14.1 Water Conservation and Rationing Plan | 540-543-W |
| No. 15 Main Extensions | 232-234-W, 349-W, 236-245-W, 852-W |
| No. 16 Service Connections, Meters and Customers' Facilities | 324-W, 350-W, 351-W, 327-330-W |
| No. 17 Standards for Measurement of Service | 352-W |
| No. 18 Meter Tests and Adjustment of Bills for Meter Error | 43-45-W |
| No. 19 Service to Separate Premises and Multiple Units, Resale of Water | 279-W, 854-W |
| No. 20 Water Conservation | 538-W |
| No. 21 Fire Protection | 537-W |
| No. 22 Low Income Customer Assistance Program | 490-W |

(To be inserted by utility)

Issued by

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

Advice Letter No. 294-W

Timothy S. Guster

Date Filed _____

Decision No. D.19-09-010; D.10-11-034

VP & General Counsel

Effective _____

TITLE

Great Oaks Water Company
Advice Letter 294-W
Exhibit A Workpapers

Memorandum Account Balance Monterey-Style WRAM

| <u>Bill Date</u> | <u>Date</u> | Actual Billed <u>Tiered</u> | Projected Billed <u>Uniform</u> | Over (Under) <u>Billed</u> | Cumulative Over (Under) <u>Billed</u> | Cumulative Over (Under) Billed For Applied <u>Interest</u> | Interest <u>Rate</u> | Interest <u>Amount</u> | Cumulative <u>Interest</u> | Cumulative Over (Under) <u>Total</u> |
|------------------|-------------|-----------------------------------|---------------------------------------|-------------------------------|---|--|-------------------------|---------------------------|-------------------------------|--|
| 20201002 | 44106 | \$1,308.75 | \$1,514.06 | (\$205.31) | (\$581,958.40) | \$0.00 | \$0.00 | \$0.00 | \$0.00 | (\$205.31) |
| 20201006 | 44110 | \$227,143.00 | \$276,809.31 | (\$49,666.31) | (\$631,624.71) | (\$205.31) | \$0.00 | (\$0.00) | (\$0.00) | (\$49,871.62) |
| 20201013 | 44117 | \$204,048.61 | \$252,297.74 | (\$48,249.13) | (\$679,873.84) | (\$49,871.62) | \$0.00 | (\$1.15) | (\$1.15) | (\$98,121.90) |
| 20201019 | 44123 | \$186,946.62 | \$238,638.69 | (\$51,692.07) | (\$731,565.91) | (\$98,120.75) | \$0.00 | (\$1.94) | (\$3.09) | (\$149,815.91) |
| 20201027 | 44131 | \$1,229.37 | \$1,452.20 | (\$222.83) | (\$731,788.74) | (\$149,812.82) | \$0.00 | (\$3.94) | (\$7.03) | (\$150,042.68) |
| 20201102 | 44137 | \$154,058.34 | \$195,997.28 | (\$41,938.94) | (\$773,727.68) | (\$150,035.65) | \$0.00 | (\$3.95) | (\$10.97) | (\$191,985.56) |
| 20201103 | 44138 | \$822.57 | \$905.17 | (\$82.60) | (\$773,810.28) | (\$191,974.59) | \$0.00 | (\$0.84) | (\$11.81) | (\$192,069.00) |
| 20201106 | 44141 | \$122,978.52 | \$160,670.23 | (\$37,691.71) | (\$811,501.99) | (\$192,057.19) | \$0.00 | (\$2.53) | (\$14.34) | (\$229,763.24) |
| 20201109 | 44144 | \$145,046.28 | \$182,096.43 | (\$37,050.15) | (\$848,552.14) | (\$229,748.90) | \$0.00 | (\$3.02) | (\$17.36) | (\$266,816.41) |
| 20201116 | 44151 | \$152,747.10 | \$192,875.74 | (\$40,128.64) | (\$888,680.78) | (\$266,799.05) | \$0.00 | (\$8.19) | (\$25.55) | (\$306,953.24) |
| 20201123 | 44158 | \$1,345.34 | \$1,416.37 | (\$71.03) | (\$888,751.81) | (\$306,927.69) | \$0.00 | (\$9.42) | (\$34.97) | (\$307,033.69) |
| 20201201 | 44166 | \$165,986.11 | \$219,714.29 | (\$53,728.18) | (\$942,479.99) | (\$306,998.72) | \$0.00 | (\$11.44) | (\$46.40) | (\$360,773.30) |
| 20201202 | 44167 | \$136.19 | \$179.07 | (\$42.88) | (\$942,522.87) | (\$360,726.90) | \$0.00 | (\$1.68) | (\$48.08) | (\$360,817.86) |
| 20201207 | 44172 | \$141,778.27 | \$192,868.53 | (\$51,090.26) | (\$993,613.13) | (\$360,769.78) | \$0.00 | (\$8.40) | (\$56.49) | (\$411,916.53) |
| 20201214 | 44179 | \$140,565.38 | \$194,167.13 | (\$53,601.75) | (\$1,047,214.88) | (\$411,860.04) | \$0.00 | (\$13.43) | (\$69.91) | (\$465,531.70) |
| 20201221 | 44186 | \$1,064.69 | \$1,256.83 | (\$192.14) | (\$1,047,407.02) | (\$465,461.79) | \$0.00 | (\$15.18) | (\$85.09) | (\$465,739.02) |
| | | | | (\$465,653.93) | | | | (\$85.09) | | (\$465,739.02) |