



GREAT OAKS WATER COMPANY

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September 20, 2021

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

**Advice Letter 305-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
976-W	Schedule No. 1 GENERAL METERED SERVICE SPECIAL CONDITIONS	963-W
977-W	TABLE OF CONTENTS	976-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. Through Advice Letter 293-W-A, the Commission authorized Great Oaks to amortize the balance in the WRAM account, with an effective date of October 19, 2020. Then, the Commission authorized Great Oaks to amortize the balance in the WRAM account by approving Advice Letter 294-W (effective February 9, 2021), which employed the same basic methodology as presented here.

Most recently, Great Oaks' Advice Letter 298-W was approved and authorized a surcharge of \$0.2178 per ccf to amortize the then WRAM balance of \$515,706.63.

The current balance in the WRAM Account is \$643,514.31. See attached Advice Letter 305-W Exhibit A Workpapers.¹ The time period covered by the WRAM Account is from April 6, 2021 through August 30, 2021. 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.

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.

The amount to be amortized through this Advice Letter, \$643,514.31, represents 2.96% of Great Oaks’ total revenue requirement (\$21,738,457²) 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, 2021 to June 30, 2022 rate year are 2,365,424 ccf.³ The surcharge to amortize the combined WRAM balances calculates to \$0.2721 per ccf (\$643,514.31/2,365,424).

Great Oaks requests authority to implement this surcharge on all water delivered to single-family residential customers for a twelve-month period beginning November 16, 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 \$5.80 (4.02%) from \$144.42 to \$150.21, as shown below.

Bill Comparison

Average Single-Family Residential Customer with 3/4” x 3/4” Meter Using 10 ccf per Month							
At AL 300-W-A Rates				At AL 305-W Rates			
Item	Amount	Units	Total	Item	Amount	Units	Total
Monthly Serv Chrg	\$25.03	2	\$50.06	Monthly Serv Chrg	\$25.03	2	\$50.06
Tier 1	\$2.4815	12	\$29.78	Tier 1	\$2.4815	12	\$29.78
Tier 2	\$4.2825	8	\$34.26	Tier 2	\$4.2825	8	\$34.26
M-WRAM Surch (4)	\$0.9547	20	\$19.09	M-WRAM Surch (5)	\$1.2268	20	\$24.54
CAP Surch	\$0.1203	20	\$2.41	CAP Surch	\$0.1203	20	\$2.41
Subtotal			\$135.60	Subtotal			\$141.05
CPUC Fee	1.43%		\$1.94	CPUC Fee	1.43%		\$2.02
Subtotal			\$137.54	Subtotal			\$143.07
SJ Utility Tax	5%		\$6.88	SJ Utility Tax	5%		\$7.15
Total			\$144.42	Total			\$150.22

Great Oaks’ 2021 General Rate Case Application

On July 1, 2021, Great Oaks filed its General Rate Case Application (A.) 21-07-001. The filing of this Advice Letter 305-W to amortize the balance in Great Oaks’ WRAM Account has no impact or effect upon A.21-07-001, and the converse is true as well – A.21-07-001 has no impact or effect upon this Advice Letter 305-W.

² The total revenue requirement for the current rate year was authorized through Advice Letter 300-W-A, effective July 1, 2021.

³ Advice Letter 299-W, effective July 1, 2021.

It is noteworthy that Great Oaks and the Public Advocates Office worked cooperatively to correct errors made by the Public Advocates Office when creating the tiered rate design that has caused the chronic under-collections in the WRAM Account. A new tiered rate design was implemented through Great Oaks' Advice Letter 299-W, with an effective date of July 1, 2021.

Both Great Oaks and the Public Advocates Office believe that the tiered rate design in effect since July 1, 2021 will not result in significant under-collections or over-collections in the WRAM Account.

As stated above, the time period covered by the WRAM Account is from April 6, 2021 through August 30, 2021. In practical terms, this means that all water sold under the "old" tiered rate design (the tiered rate design in effect until July 1, 2021) has now been factored into the WRAM Account balance. From this point forward, the WRAM Account will be tracking water sales and revenues under the current, revised tiered rate design.

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 305-W be effective as of November 16, 2021.

Notice

Great Oaks published notice of Advice Letter 305-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

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 305-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 September 20, 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 305-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 September 20, 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

State Water Resources Control Board
Division of Drinking Water
850 Marina Bay Parkway
Building P, 2nd Floor
Richmond, CA 94804

Office of Regulatory Affairs*
California Water Service Company
1720 North First Street
San Jose, CA 95112
Sacramento, CA 95814
(via email: 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 95115

Advice Letter 305-W Exhibit A Workpapers

Bill Date	Date	Uniform	Charged	Diff	Balance for Int.	Interest Rate	Interest	Accum Int	Cum Under	Cum Tot
20210405	4/5/2021	\$ -	\$ -	\$ -	\$ -	0.11%	\$ -	\$ -	\$ -	\$ -
20210406	4/6/2021	\$ 162,377.09	\$ 112,016.91	\$ 50,360.18	\$ -	0.11%	\$ -	\$ -	\$ 50,360.18	\$ 50,360.18
20210412	4/12/2021	\$ 153,958.65	\$ 105,473.69	\$ 48,484.96	\$ 50,360.18	0.11%	\$ 0.91	\$ 0.91	\$ 98,845.14	\$ 98,846.05
20210419	4/19/2021	\$ 173,152.92	\$ 119,897.09	\$ 53,255.83	\$ 98,845.14	0.11%	\$ 2.09	\$ 3.00	\$ 152,100.97	\$ 152,103.97
20210426	4/26/2021	\$ 371.39	\$ 205.37	\$ 166.02	\$ 152,100.97	0.11%	\$ 3.21	\$ 6.20	\$ 152,266.99	\$ 152,273.19
20210503	5/3/2021	\$ 150,463.29	\$ 107,623.96	\$ 42,839.33	\$ 152,266.99	0.10%	\$ 2.92	\$ 9.12	\$ 195,106.32	\$ 195,115.44
20210504	5/4/2021	\$ 514.44	\$ 422.13	\$ 92.31	\$ 195,106.32	0.10%	\$ 0.53	\$ 9.66	\$ 195,198.63	\$ 195,208.29
20210505	5/5/2021	\$ 127,036.08	\$ 89,436.75	\$ 37,599.33	\$ 195,198.63	0.10%	\$ 0.53	\$ 10.19	\$ 232,797.96	\$ 232,808.15
20210510	5/10/2021	\$ 145,360.84	\$ 107,246.08	\$ 38,114.76	\$ 232,797.96	0.10%	\$ 3.19	\$ 13.38	\$ 270,912.72	\$ 270,926.10
20210517	5/17/2021	\$ 166,772.35	\$ 125,000.12	\$ 41,772.23	\$ 270,912.72	0.10%	\$ 5.20	\$ 18.58	\$ 312,684.95	\$ 312,703.53
20210524	5/24/2021	\$ 1,269.85	\$ 1,028.10	\$ 241.75	\$ 312,684.95	0.10%	\$ 6.00	\$ 24.58	\$ 312,926.70	\$ 312,951.28
20210601	6/1/2021	\$ 232,237.01	\$ 179,061.70	\$ 53,175.31	\$ 312,926.70	0.09%	\$ 6.17	\$ 30.75	\$ 366,102.01	\$ 366,132.76
20210602	6/2/2021	\$ 599.10	\$ 418.15	\$ 180.95	\$ 366,102.01	0.09%	\$ 0.90	\$ 31.65	\$ 366,282.96	\$ 366,314.61
20210607	6/7/2021	\$ 214,970.76	\$ 164,503.15	\$ 50,467.61	\$ 366,282.96	0.09%	\$ 4.52	\$ 36.17	\$ 416,750.57	\$ 416,786.74
20210614	6/14/2021	\$ 220,882.76	\$ 167,977.46	\$ 52,905.30	\$ 416,750.57	0.09%	\$ 7.19	\$ 43.36	\$ 469,655.87	\$ 469,699.23
20210628	6/28/2021	\$ 4,216.55	\$ 3,597.27	\$ 619.28	\$ 469,655.87	0.09%	\$ 16.21	\$ 59.57	\$ 470,275.15	\$ 470,334.72
20210702	7/2/2021	\$ 3,194.82	\$ 2,564.01	\$ 630.81	\$ 470,275.15	0.10%	\$ 5.15	\$ 64.73	\$ 470,905.96	\$ 470,970.69
20210712	7/12/2021	\$ 254,547.07	\$ 206,976.32	\$ 47,570.75	\$ 470,905.96	0.10%	\$ 12.90	\$ 77.63	\$ 518,476.71	\$ 518,554.34
20210719	7/19/2021	\$ 218,006.31	\$ 179,675.79	\$ 38,330.52	\$ 518,476.71	0.10%	\$ 9.94	\$ 87.57	\$ 556,807.23	\$ 556,894.80
20210721	7/21/2021	\$ 254,592.12	\$ 227,151.76	\$ 27,440.36	\$ 556,807.23	0.10%	\$ 3.05	\$ 90.62	\$ 584,247.59	\$ 584,338.21
20210726	7/26/2021	\$ 1,155.83	\$ 1,182.31	\$ (26.48)	\$ 584,247.59	0.10%	\$ 8.00	\$ 98.63	\$ 584,221.11	\$ 584,319.74
20210729	7/29/2021	\$ 277,820.26	\$ 253,887.96	\$ 23,932.30	\$ 584,221.11	0.10%	\$ 4.80	\$ 103.43	\$ 608,153.41	\$ 608,256.84
20210802	8/2/2021	\$ 2,300.08	\$ 2,209.28	\$ 90.80	\$ 608,153.41	0.10%	\$ 6.66	\$ 110.09	\$ 608,244.21	\$ 608,354.30
20210812	8/12/2021	\$ 350,289.50	\$ 333,720.49	\$ 16,569.01	\$ 608,244.21	0.10%	\$ 16.66	\$ 126.76	\$ 624,813.22	\$ 624,939.98
20210823	8/23/2021	\$ 326,153.77	\$ 317,275.46	\$ 8,878.31	\$ 624,813.22	0.10%	\$ 18.83	\$ 145.59	\$ 633,691.53	\$ 633,837.12
20210825	8/25/2021	\$ 659.07	\$ 730.13	\$ (71.06)	\$ 633,691.53	0.10%	\$ 3.47	\$ 149.06	\$ 633,620.47	\$ 633,769.53
20210830	8/30/2021	\$ 316,830.58	\$ 307,094.48	\$ 9,736.10	\$ 633,620.47	0.10%	\$ 8.68	\$ 157.74	\$ 643,356.57	\$ 643,514.31

\$ 643,356.57 <== Water Usage Under Collection

157.74 <== Interest thru 08/30/2021

\$ 643,514.31 <== Total Under Collection Pus Interest as of 08/30/2021

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 \$0.1203 will be added to the Quantity Charge for all water delivered to non-LICAP participants on and after July 1, 2021.
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.
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.
7. To amortize the balance in the Utility's Monterey-Style WRAM account, a surcharge of \$0.2178 will be added to the Quantity Charge for all single-family residential customers for a period of twelve months beginning May 10, 2021.
8. To amortize the balance in the Utility's Monterey-Style WRAM account, a surcharge of \$0.2721 (N) will be added to the Quantity Charge for all single-family residential customers for a period of twelve months beginning November 16, 2021. (N)

(To be inserted by utility)

Issued by

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

Advice Letter No. 305-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	977-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, 971-W, 972-W
Service Area Map	644-W to 670-W
Rate Schedules:	
Schedule No. 1, General Metered Service	961-W, 976-W, 963-W (C)
Schedule No. 3M, Irrigation Service	964-W, 965-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	966-W, 884-W
Schedule No. 9C, Construction Flat Rate Service	817-W, 818-W
Schedule No. 14.1 Mandatory Water Conservation	768-W, 968-W, 969-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. 305-W

Timothy S. Guster

Date Filed _____

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

VP & General Counsel

Effective _____

TITLE