

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Great Oaks Water
Company (U-162-W) for an Order
authorizing it to increase rates charges
for water service by \$2,618,705 or
12.05% in 2022, by \$1,762,136 or 7.23%
in 2023, and by \$1,879,770 or 7.20%
in 2024.

Application No. 21-07-001

Filed: July 1, 2021

**GREAT OAKS WATER COMPANY'S
REBUTTAL TESTIMONY**

APPENDIX



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Public Advocates Office
Response to Data Request DR-1 (Part 1 of 2)
A.21-07-001: Great Oaks Water Company
Application of Great Oaks Water Company to Increase Rates for Water Service

Date: November 30, 2021

From: **Roy Keowen**
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John W.S. Roeder
Chief Executive Officer
Great Oaks Water Company

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Re: A.21-07-001 GOWC DR-1

Requested Responses Date: November 30, 2021.

RESPONSE

1. Does Cal Advocates intend to offer testimony by any “expert” witness in this proceeding? In this context, the term “expert” has the same meaning as that provided in California Evidence Code Section 720(a).

California Evidence Code Section 720(a) provides:

A person is qualified to testify as an expert if he has special knowledge, skill, experience, training, or education sufficient to qualify him as an expert on the subject to which his testimony relates. Against the objection of a party, such special knowledge, skill, experience, training, or education must be shown before the witness may testify as an expert.

Response to Q1: Question 1 overlooks the fact the Commission’s proceedings need not rely on California Evidence Code Section 720(a).¹ Cal Advocates provided testimony in accordance with Rule 13.8.

2. If the answer to question 1 is yes, please provide the following for each person intending to provide “expert” testimony in this proceeding:
 - a. The name of the witness.
 - b. The subject matter of the intended “expert” testimony.
 - c. The special knowledge of the witness on the subject matter of the intended “expert” testimony.
 - d. The special skill of the witness on the subject matter of the intended “expert” testimony.
 - e. The special experience of the witness on the subject matter of the intended “expert” testimony.
 - f. The special training of the witness on the subject matter of the intended “expert” testimony.
 - g. The special education of the witness on the subject matter of the intended “expert” testimony.

Response to Q2.a-g: For the qualifications of Cal Advocates witnesses who provided testimony under Rule 13.8, see Attachments 1-5 of the Public Advocates Office Report on Great Oaks Water Company’s Fiscal Test Year 2022-2023 General Rate Case Application, A.21-07-001, November 19, 2021 (Cal Advocates Report).

¹ See California Public Utilities Commission Rule of Practice and Procedure (Rule) 13.6(a).

3. With respect to any issue presented in Application 21-07-001, did any person employed by or affiliated with Cal Advocates have communications with any person employed by or affiliated with the State Water Resources Control Board Division of Drinking Water concerning Great Oaks?

As agreed, response to Q3 will be provided no later than December 3, 2021.

4. If the answer to question 3 is yes, please provide the following:
 - a. The dates of each communication.
 - b. The names of each person involved in each communication.
 - c. Copies of all communications sent and received that included or formed any part of such communications.
 - d. Telephone logs of any telephone conversations that included such communications.
 - e. Recordings of any such communications.
 - f. Complete written summaries of all such communications that were either not recorded or not in email form.

As agreed, response to Q4 will be provided no later than December 3, 2021.

5. Did Cal Advocates communicate with any Great Oaks customers regarding the any issue presented in Application 21-07-001?

Response to Q5: Objection. The question is not relevant to the proceeding and goes beyond the scope of Cal Advocates' testimony. Without waiving its objections, Cal Advocates responds with the following: No.

6. If the answer to question 5 is yes, please provide the following information:
 - a. The name and contact information for each customer with whom Cal Advocates communicated regarding any issue presented in Application 21-07-001.
 - b. The date of each communication with each customer identified in subpart a, above.
 - c. The subject matter of each communication identified in subpart b, above.
 - d. Copies of all email communications between Cal Advocates and Great Oaks customers on any issue presented in Application 21-07-001.
 - e. Recordings of any such communications.
 - f. Complete written summaries of all such communications that were either not recorded or not in email form.

Response to Q6.a-f: Objection. The question is not relevant to the proceeding and goes beyond the scope of Cal Advocates' testimony. Without

waiving its objections, Cal Advocates responds with the following: Not applicable.

7. During the Public Participation Hearing (PPH) for this proceeding on November 9, 2021, Roy Keowen stated that “recommendations” would be made by Cal Advocates with respect to Application 21-07-001.
 - a. To the extent that any such recommendations pertain to projected operating and maintenance expenses for Test Year 2022/2023 and beyond, please provide the following information:
 - i. The name of the person making each such recommendation.
 - ii. The experience of each person making such recommendations as an employee of or consultant to a drinking water utility (such as Great Oaks).
 - iii. The experience of each person making such recommendations as an employee of or consultant to any non-governmental entity, including business entities.
 - iv. The decision-making authority each person making such recommendation has had in any employed position with respect to operations and maintenance expenditures.

Response to Q7a.i-iv: See Attachment 2 of Cal Advocates Report.

- b. To the extent that any such recommendations pertain to projected administrative and general expenses for Test Year 2022/2023 and beyond, including employee benefits and insurance expenses, please provide the following information:
 - i. The name of the person making each such recommendation.
 - ii. The experience of each person making such recommendations as an employee of or consultant to a drinking water utility (such as Great Oaks).
 - iii. The experience of each person making such recommendations as an employee of or consultant to any non-governmental entity, including business entities.
 - iv. The decision-making authority each person making such recommendation has had in any employed position with respect to administrative and general expenditures.

Response to Q7b.i-iv: See Attachment 3 of Cal Advocates Report.

- c. To the extent that any such recommendations pertain to proposed capital expenditures by Great Oaks, please provide the following information:
 - i. The name of each person making such recommendation.

- ii. The experience of each person making such recommendations as an employee of a drinking water utility (such as Great Oaks).
- iii. The experience of each person making such recommendations as an employee of or consultant to any non-governmental entity, including business entities.
- iv. The decision-making authority each person making such recommendation has had in any employed position with respect to capital expenditures.

Response to Q7c.i-iv: See Attachment 4 of Cal Advocates Report.

- d. To the extent that any such recommendations pertain to water quality issues presented or implicated by Application 21-07-001, please provide the following information:
 - i. The name of each person making such recommendation.
 - ii. The experience of each person making such recommendations as an employee of or consultant to a drinking water utility (such as Great Oaks).
 - iii. The experience of each person making such recommendations as an employee of or consultant to any non-governmental entity, including business entities.
 - iv. The decision-making authority each person making such recommendation has had in any employed position with respect to water quality issues.
 - v. Any licenses or certifications related to water quality earned by each person making such recommendations, including any treatment operator certifications issued in California.

Response to Q7c.i-iv: See Attachment 4 of Cal Advocates Report.

End Request



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Public Advocates Office
Response to Data Request DR-1 (Part 2 of 2)
A.21-07-001: Great Oaks Water Company
Application of Great Oaks Water Company to Increase Rates for Water Service

Date: December 3, 2021

From: **Roy Keowen**
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Re: A.21-07-001 GOWC DR-1

Requested Responses Date: December 3, 2021

RESPONSE

3. With respect to any issue presented in Application 21-07-001, did any person employed by or affiliated with Cal Advocates have communications with any person employed by or affiliated with the State Water Resources Control Board Division of Drinking Water concerning Great Oaks?

Response to Q3: Cal Advocates objects to the question to the extent it seeks information that goes beyond the scope of Cal Advocates' testimony. The intrusiveness of the discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence under Rule 10.1. Without waiving its objections, Cal Advocates responds with the following: Yes.

4. If the answer to question 3 is yes, please provide the following:
- a. The dates of each communication.
 - b. The names of each person involved in each communication.
 - c. Copies of all communications sent and received that included or formed any part of such communications.
 - d. Telephone logs of any telephone conversations that included such communications.
 - e. Recordings of any such communications.
 - f. Complete written summaries of all such communications that were either not recorded or not in email form.

Response to Q4.a-f: Cal Advocates objects to the question to the extent it seeks information that goes beyond the scope of Cal Advocates' testimony. The intrusiveness and burden of the discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence under Rule 10.1. Without waiving its objections, Cal Advocates responds with the following: See the attached document titled GOWC-DR-1 Q4 Privilege Log. Cal Advocates is still reviewing to see if there are any responsive non-privileged documents that can be produced.

End Request

Public Advocates Office Response to Data Request GOWC-DR-1 Question 4
Privilege Log

#	Date	Time	From	To	Cc	Summary	Basis of Privilege
1	9/8/2021	9:44 AM	Goldberg, Daphne <Daphne.Goldberg@cpuc.ca.gov>	Wald, Ileana@Waterboards <Ileana.Wald@Waterboards.ca.gov>; Lacy, Eric@Waterboards <Eric.Lacy@waterboards.ca.gov>	Keowen, Roy <Roy.Keowen@cpuc.ca.gov>; Gibbs, Syreeta <syreeta.gibbs@cpuc.ca.gov>; Lee, Chasel <Chasel.Lee@cpuc.ca.gov>	Request to discuss Great Oaks application	Attorney-client privilege (Evid. Code § 954); MOU between the State Water Resources Control Board (SWRCB) and the California Public Utilities Commission (CPUC) signed on December 9, 2020; Common interest doctrine
2	9/8/2021	9:44 AM	Goldberg, Daphne <Daphne.Goldberg@cpuc.ca.gov>	Wald, Ileana@Waterboards <Ileana.Wald@Waterboards.ca.gov>; Lacy, Eric@Waterboards <Eric.Lacy@waterboards.ca.gov>	Keowen, Roy <Roy.Keowen@cpuc.ca.gov>; Gibbs, Syreeta <syreeta.gibbs@cpuc.ca.gov>; Lee, Chasel <Chasel.Lee@cpuc.ca.gov>	Attachment to Email in Line 1	Attorney-client privilege (Evid. Code § 954); MOU between SWRCB and CPUC signed on December 9, 2020; Common interest doctrine
3	9/8/2021	2:42 PM	Wald, Ileana@Waterboards <Ileana.Wald@Waterboards.ca.gov>	Goldberg, Daphne <Daphne.Goldberg@cpuc.ca.gov>; Lacy, Eric@Waterboards <Eric.Lacy@waterboards.ca.gov>	Keowen, Roy <Roy.Keowen@cpuc.ca.gov>; Gibbs, Syreeta <syreeta.gibbs@cpuc.ca.gov>; Lee, Chasel <Chasel.Lee@cpuc.ca.gov>	Response to request to discuss Great Oaks application	Attorney-client privilege (Evid. Code § 954); MOU between SWRCB and CPUC signed on December 9, 2020; Common interest doctrine
4	9/8/2021	2:47 PM	Goldberg, Daphne <Daphne.Goldberg@cpuc.ca.gov>	Wald, Ileana@Waterboards <Ileana.Wald@Waterboards.ca.gov>; Lacy, Eric@Waterboards <Eric.Lacy@waterboards.ca.gov>	Keowen, Roy <Roy.Keowen@cpuc.ca.gov>; Gibbs, Syreeta <syreeta.gibbs@cpuc.ca.gov>; Lee, Chasel <Chasel.Lee@cpuc.ca.gov>	Response to Ileana Wald's response	Attorney-client privilege (Evid. Code § 954); MOU between SWRCB and CPUC signed on December 9, 2020; Common interest doctrine

Photos of Ashmont 1MG Tank



PITTSBURGH-DES MOINES
STEEL COMPANY

7630 MAX 3012 1000,000 GAL.

CONTRACT NO.
YEAR ERECTED

31798

1972

















Photos of Ashmont .5MG Tank





















Photos of Calero Tank

LIQUID TANK DATA

DATE	8-91	S.O.	12022
DIA.	47	HT.	18
NOM. CAPACITY	214300		

DESIGN DATA

PRODUCT	WATER		
SPECIFIC GRAVITY	1.0		
DESIGN SPEC	AWMA D103		

MAX. OPERATING PRESSURE DO NOT EXCEED

PRESSURE	1.0	VACUUM	0.5
OZ/SQ IN		OZ/SQ IN	

IMPORTANT

THIS TANK IS DESIGNED ONLY FOR LOADS FROM A PRODUCT OF THE INDICATED SPECIFIC GRAVITY. MODIFICATIONS TO THE TANK OR STORAGE OF A PRODUCT OTHER THAN THAT ORIGINALLY SPECIFIED REQUIRES THE APPROVAL OF PEABODY TECTANK.


Peabody TecTank
PARSONS, KS.













Levin 3MG Tank

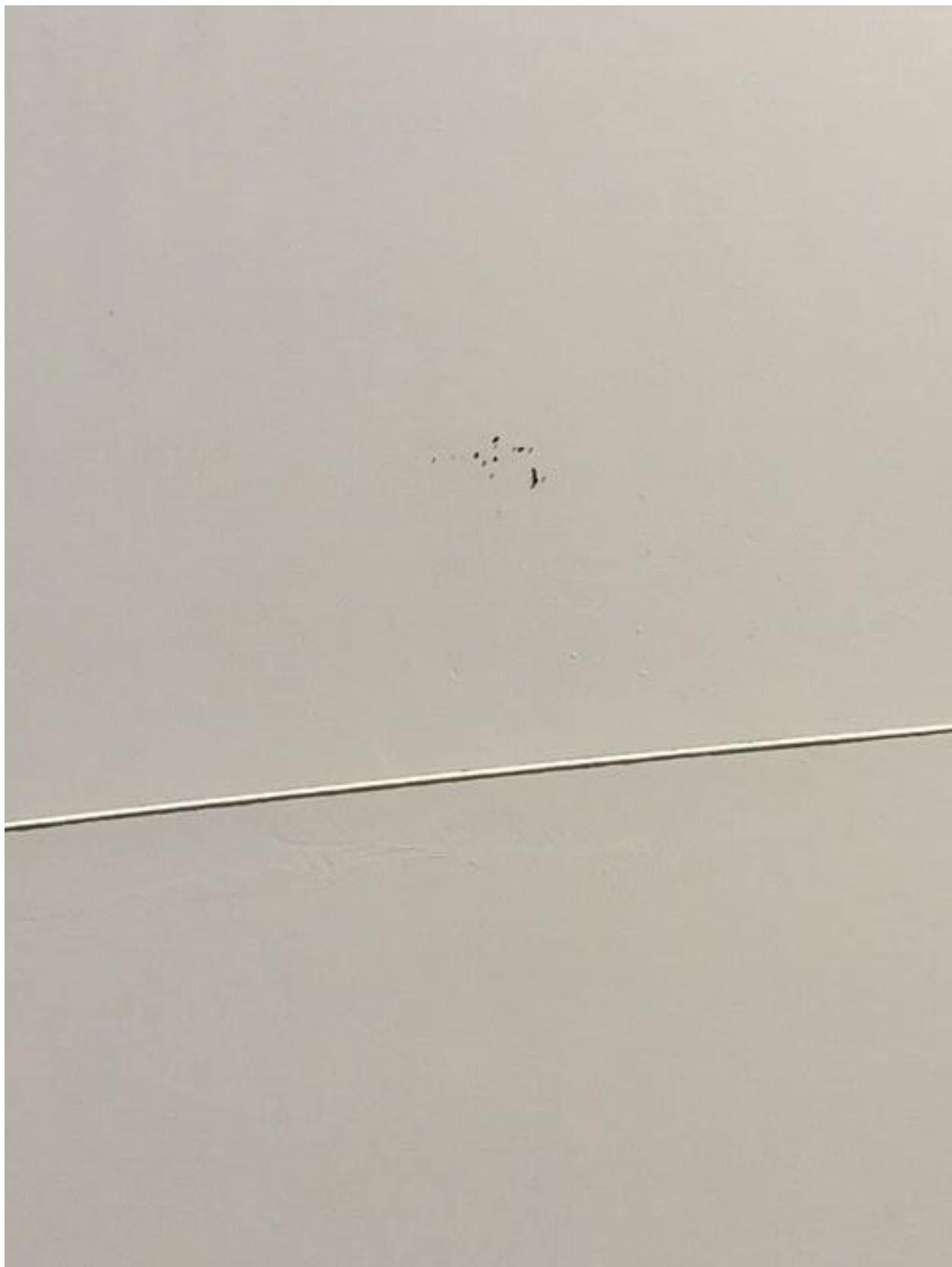










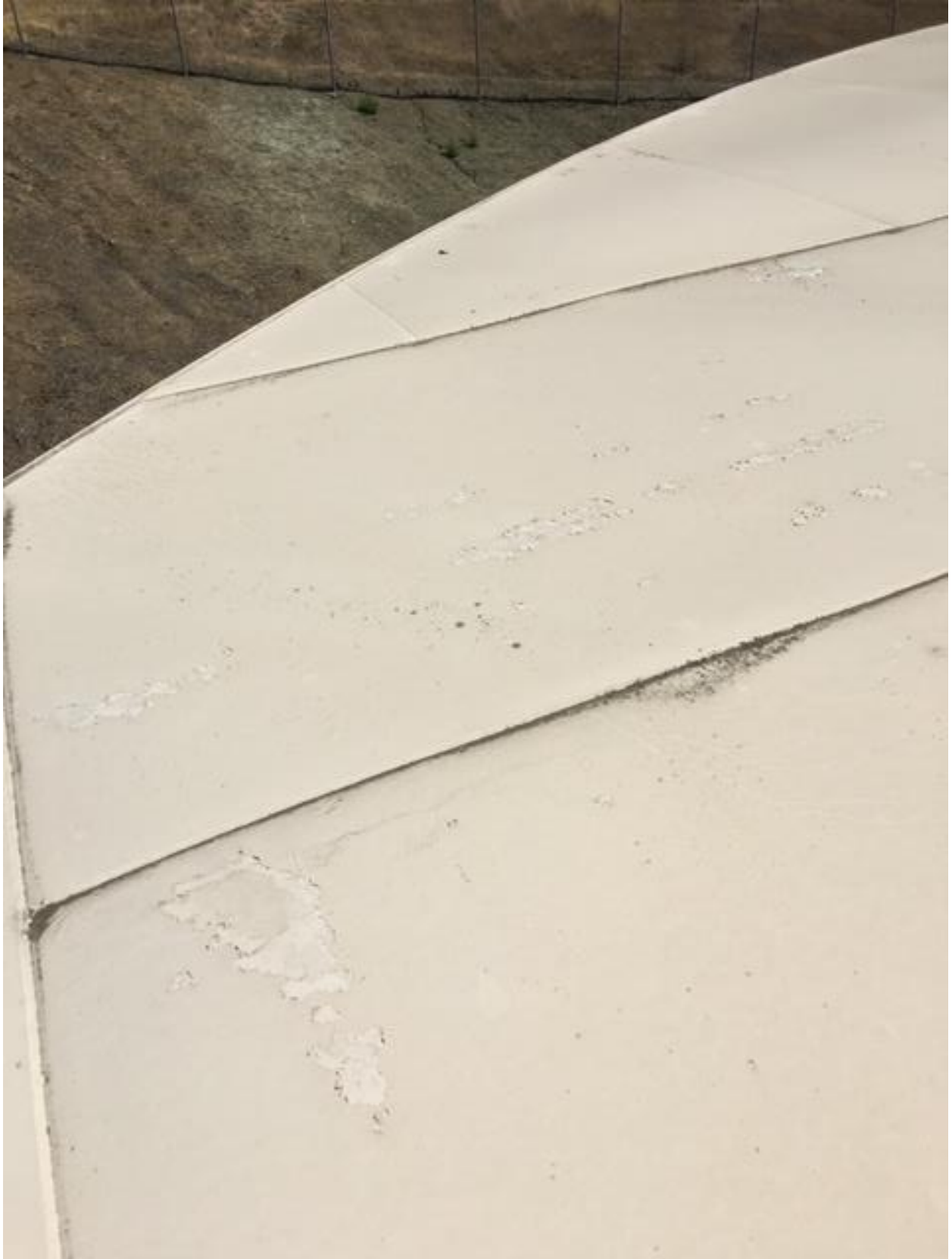




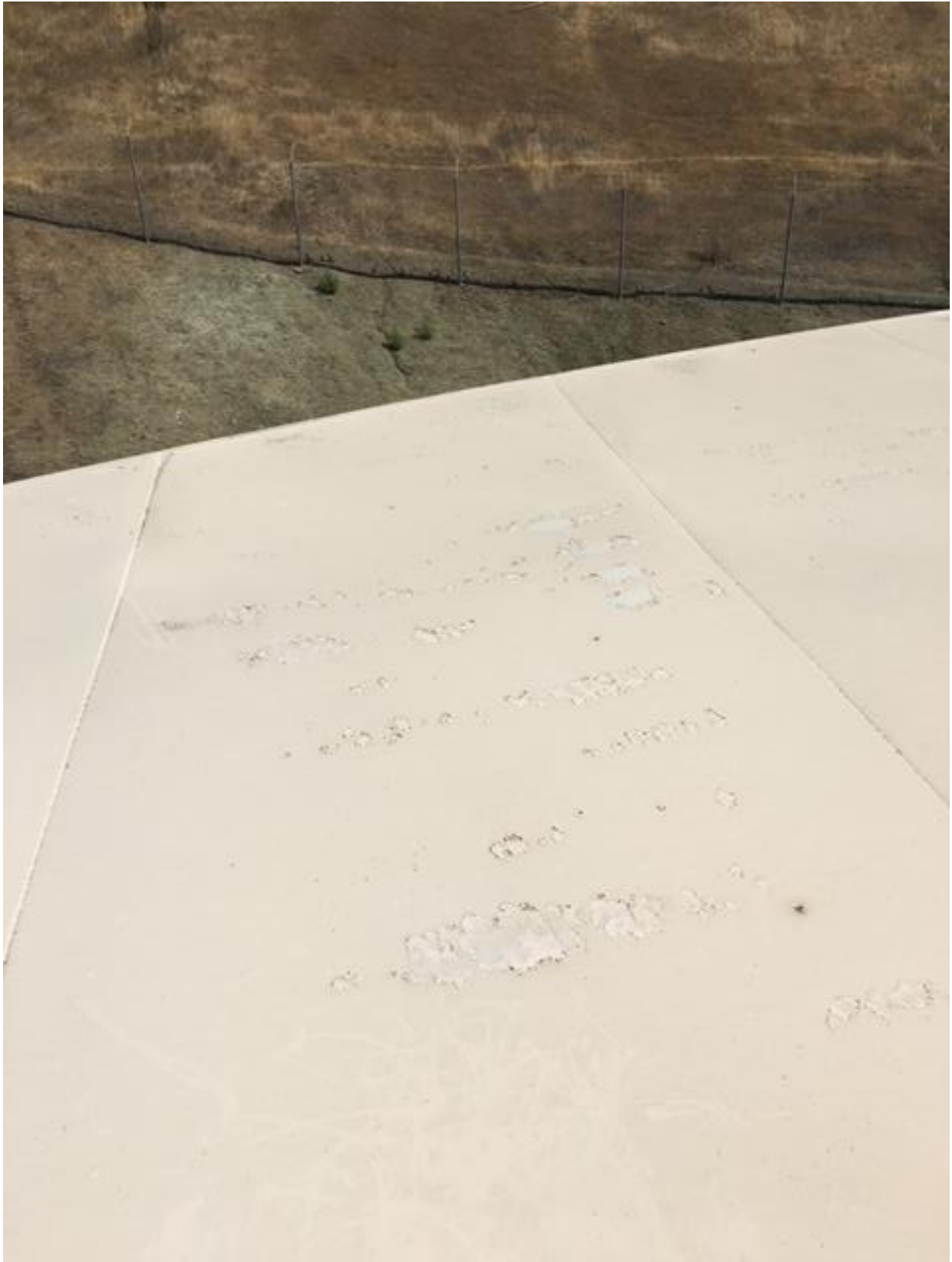
















Levin 1.5MG Tank

































GREAT OAKS WATER COMPANY

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September 21, 2021

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RE: Great Oaks Water Company Response to Data Request DG-009

Great Oaks Water Company (Great Oaks) hereby provides its response to Cal Advocates Data Request DG-009 (Exhibit F Plant and Depreciation). Please note Great Oaks Water Company's Objections to Data Request Instructions from the Public Advocates Office, a copy of which is included with this Response.

DATA REQUESTS

1. Account 324 – Pumping Equipment

A.21-07-001 Exhibit F, tab "WP-18 Plnt In Svc Add Retr Dtl 1", Row 24 "Account 324-Pumping Equipment" includes amounts of "\$121,615" in Cells I24-M24 (Years 2021/2022, 2022/2023, 2023/2024, and 2024/2025, respectively).

A.21-07-001 Exhibit F, tab “WP-24 Depreciation Calc Detail”, Row 27 “Account 324-Pumping Equipment” includes hard-coded amounts of “\$121,615” in Cells C27, P27, AC27, AP27, BC27, and BP27 (Years 2020, 2020/2021, 2021/2022, 2022/2023, 2023/2024, and 2024/2025, respectively).

A.21-07-001 Exhibit G includes one proposed “Account 324-Pumping Equipment” project “Booster Pump for Calero Pump” in Test Year 2022/2023 in the amount of \$67,600.

- a. List and describe the cost components which are included in the amount of \$121,615 per year.

Response: \$18,443 – Well 20 breaker replacement; \$29,920 – Calero booster generator switch; \$44,038 – Calero booster pump #2; \$5,122 – Replace Well 9 turbine shaft; \$24,092 – Emergency generator Wells 23, 23A, and 24. $\$18,443 + \$29,920 + \$44,038 + \$5,122 + \$24,092 = \$121,615$.

- b. Is the “Booster Pump for Calero Pump” project included in the Test Year amount of \$121,615 for 2022/2023?

Response: Yes. See response to 1.a., above.

- c. Provide the formula for each cell that has a hard-coded entry of \$121,615, stated above, included in “WP-24 Depreciation Calc Detail” Account – 324 Pumping Equipment.

Response: See response to 1.a., above.

- d. State if the amount of \$121,615 in each cell in WP-24 Depreciation Calc Detail” Account – 324 Pumping Equipment is equal to the amount of \$121,615 in each cell in “WP-18 Plnt In Svc Add Retr Dtl 1”.

Response: Yes. See response to 1.a., above.

- e. Explain the differences between the Account 324-Pumping Equipment Exhibit F workpaper entries of \$121,615, as stated above, and the Account 324-Pumping Equipment Exhibit G proposed “Booster Pump for Calero Pump” project in the amount of \$67,600.

Response: The \$67,600 in Exhibit G is a specific, planned project that would be included in the \$121,615. Fixed asset additions in this category are volatile, hard to predict, and generally based upon an immediate need. The \$121,615 is a projection based on recent history as the system ages.

2. Account 332 – Water Treatment Equipment

A.21-07-001 Exhibit F, tab “WP18 Plnt In Svc Add Retr Dtl 1”, Row 30 “Account 332- Water Treatment Equipment” includes amounts of “\$10,000” in Cells J30-M30 (Years 2021/2022, 2022/2023, 2023/2024, and 2024/2025).

A.21-07-001 Exhibit F, tab “WP-24 Depreciation Calc Detail”, Row 33 “Account 332- Water Treatment Equipment” includes hard-coded amounts of “\$10,000” in Cells AC27, AP27, BC27, and BP27 (Years 2020, 2020/2021, 2021/2022, 2022/2023, 2023/2024, and 2024/2025, respectively).

A.21-07-001 Exhibit G does not include Account 332 – Water Treatment Equipment proposed projects.

- a. List and describe the cost components which are included in the amount of \$10,000 per year.

Response: This is not the sum of specific cost components; it is a projection based upon the age of the system, general cost increases of all component parts and materials, and the experience of Great Oaks in operating and maintaining the water system in proper working order. In the 2018 General Rate Case, the projected costs in this account were based upon an estimate of \$7,500 each year. In the 2021 General Rate Case, the projected costs in this account are based upon an estimate of \$10,000 each year.

- b. Provide the formula for each cell that has a hard-coded entry of \$10,000 included in “WP-24 Depreciation Calc Detail” Account – 324 Pumping Equipment.

Response: Objection. There are no “hard-coded” entries of \$10,000 included in the “WP-24 Depreciation Calc Detail” Account – 324 Pumping Equipment. Without waiving this objection, Great Oaks states that the \$10,000 in WP24 Cells AP33, BC33, and BP33 for Account 324 Pumping Equipment are not “hard-coded,” but are instead drawn from WP18, Cells K30, L30, and M30, respectively. Please see the formulas for WP24 Cells AP33, BC33, and BP33.

- c. State if the amount of \$10,000 in each cell in WP-24 Depreciation Calc Detail” Account – 324 Pumping Equipment is equal to the amount of \$10,000 in each cell in “WP-18 Plnt In Svc Add Retr Dtl 1”.

Response: Yes. See response to 2.b., above.

- d. Explain the differences between the Account 332 – Water Treatment Equipment Exhibit F workpaper entries of \$10,000, as stated above, and A.21-07-001 Exhibit G.

Response: Exhibit G only provides information on newly proposed capital projects. The Account 332 – Water Treatment Equipment Exhibit F workpaper entries are routine and recurring capital additions based upon the age of the system, general cost increases in all component parts and materials, and the experience of Great Oaks in operating and maintaining the water system in proper working order.

3. Account 342 – Reservoirs and Tanks

A.21-07-001 Exhibit F, tab “WP18 Plnt In Svc Add Retr Dtl 1”, Row 35 “Account 342-Reservoir & Tanks” includes amounts of “\$35,000” in Cells L35 and M35 (Years 2023/2024 and 2024/2025).

A.21-07-001 Exhibit F, tab “WP-24 Depreciation Calc Detail”, Row 33 “Account 342-Reservoir & Tanks” includes hard-coded amount of “\$35,000” in Cells BC27, and BP27 (Years 2023/2024, and 2024/2025, respectively).

A.21-07-001 Exhibit G does not include Account 342 – Reservoir & Tanks proposed projects in years 2023/2024 and 2024/2025.

- a. List and describe the cost components which are included in the amount of \$35,000 per year.

Response: The \$35,000 is a projection based upon the adopted amount from the 2018 General Rate Case, the age of the system, general cost increases in all component parts and materials, and the experience of Great Oaks in operating and maintaining the water system, including its reservoirs and tanks, in proper working order.

- b. Provide the formula for each cell that has a hard-coded entry of \$35,000 included in “WP-24 Depreciation Calc Detail” Account 342-Reservoir & Tanks.

Response: See response to 3.a., above.

- c. State if the amount of \$35,000 in each cell in WP-24 Depreciation Calc Detail” Account 342-Reservoir & Tanks is equal to the amount of \$35,000 in each cell in “WP-18 Plnt In Svc Add Retr Dtl 1”.

Response: See response to 3.a., above.

- d. Explain the differences between the Account 342-Reservoir & Tanks Exhibit F workpaper entries of \$35,000 in years 2023/2024 and 2024/2025, as stated above, and A.21-07-001 Exhibit G.

Response: Exhibit G only provides information on newly proposed capital projects. The Account 342 – Reservoirs & Tanks Exhibit F workpaper entries are routine and

recurring capital additions based upon the age of the system, general cost increases in all component parts and materials, and the experience of Great Oaks in operating and maintaining the water system in proper working order.

4. Depreciation – Meters

A.21-07-001 Exhibit F, tab “WP24b-Depr Vintage Fctr Calc”, Row 4 “Service Life-Years” for Account 346 – Meters states “15” years.

- a. Is there justification for deviation of the Service Life – Years from CPUC Standard Practice U-4 (p.30), which states that Meters have a service life between 25-40 years? Please explain.

Response: Objection. The question misrepresents Standard Practice U-4-W, as it does not state that Meters have a service life between 25-40 years. Standard Practice U-4-W specifically notes: “Plant of a particular utility may justify a service life outside of above range.” See Note 1 on the page of Standard Practice U-4-W cited in question 4.a. Without waiving this objection, Great Oaks states that 15 years is used based upon Great Oaks’ experience with meters. Also of relevance is General Order 103-A, which provides the maximum time periods for meters in service and Great Oaks’ meter replacement program approved by the Commission. Because of these factors – Great Oaks’ experience with meters, General Order 103-A, and the meter replacement program – Great Oaks has used 15 years for meter depreciation purposes since its 2005 General Rate Case, with specific approval of the Commission and what is now known as the Public Advocates Office.

5. Depreciation – Meter Installations

A.21-07-001 Exhibit F, tab “WP24b-Depr Vintage Fctr Calc”, Row 4 “Service Life-Years” for Account 347 – Meter Installations states “15” years.

- a. Is there justification for deviation of the Service Life – Years from CPUC Standard Practice U-4 (p.30), which states that Meter Installations have a service life between 25-45 years? Please explain.

Response: Objection. The question misrepresents Standard Practice U-4-W, as it does not state that Meters have a service life between 25-40 years. Standard Practice U-4-W specifically notes: “Plant of a particular utility may justify a service life outside of above range.” See Note 1 on the same page 30 cited in question 4.a. Without waiving this objection, Great Oaks states that 15 years is used based upon Great Oaks’ experience with meters. Also of relevance is General Order 103-A, which provides the maximum time periods for meters in service and Great Oaks’ meter replacement program approved by the Commission. Because of these factors – Great Oaks’ experience with meters, General Order 103-A, and the meter replacement program – Great Oaks has used 15

years for meter depreciation purposes since its 2005 General Rate Case, with specific approval of the Commission and what is now known as the Public Advocates Office.

6. Account 345- Services

A.21-07-001 Exhibit F, tab “WP18 Plnt In Svc Add Retr Dtl 1”, “Account 345-Services”, includes the following amounts:

	Recorded	Recorded	Recorded	Recorded
	CY 2017	CY 2018	CY 2019	CY 2020
Account 345-Service	\$ 78,498	\$ 79,249	\$ 86,657	\$ 238,067

- a. Provide justification for the recorded amount increase from 2017 to 2018, 2018 to 2019, and 2019 to 2020, respectively (shown in the “WP18 Plnt In Svc Add Retr Dtl 1” and table above).

Response: **2017:** \$56,998 – new service at Santa Teresa Transit Village; \$21,500 – new service at Rancho San Vicente 2”. **2018:** \$7,551 – SV10 Design Equinox; \$8,393 – new service design 449 Blossom Hill Road; \$42,008 – three new 1.5” services on Neilson Court; \$2,678 – new 2” service at 22000 Timothy Lane; \$1,017 – installation of 1” service at 22460 McKean Road; \$4,741 – two new 2” services at 22320 McKean Road; \$1,872 – new 1” service at McKean and Fortini; \$10,989 – two new 2” services at 5502 Monterey Road. **2019:** \$48,239 – Istar Costco services; \$11,355 – Silver Creek Valley VA Hospital service; \$3,030 – Lennar South Village service; \$6,970 – new 1.5” service at 20720 McKean Road; \$5,038 – 2” service at 21410 Tierra Grande; \$12,026 – new service at 6514 Kona Court. **2020:** \$3,845 – service at 5855 Silver Creek Valley; \$20,815 – new service at 5801 Cottle Road; \$2,340 – new 1” service at 5647 Keymar Drive; \$43,090 – new service for City of San Jose Bernal/Monterey Road Project; \$167,978 – new service Habitat for Humanity.

7. Retirements – Abandoned Rahway Pipeline

- a. As a follow-up to GOWC response to Public Advocates Office data request DG-003, Q.8, on what date was the Rahway asbestos cement pipeline abandoned?

Response: Objection. The question is vague and subject to more than one interpretation. Data Request DG-003, question 8, asks about both the lower and upper portions of the original pipeline. As a result, it is unclear whether this question is asking about the abandoned lower or upper pipelines. Without waiving this objection, and in an effort to provide responsive information, Great Oaks states that the lower portion was “abandoned” in 1988 when the new “lower” pipeline was placed into service. Great Oaks also states that the old “upper” portion of the pipeline was “abandoned” on or about December 13, 2019, when the new “upper” portion of the pipeline was placed into service.

- b. What is the account name and number where the Rahway abandoned asbestos cement pipe remaining book value is recorded?

Response: Objection. See objection to question 7.a., above. Without waiving this objection, and in an effort to provide responsive information, Great Oaks states that the original Rahway pipeline was installed in 1977. It has no remaining book value.

- c. What was the recorded book value of the Rahway abandoned asbestos cement pipe?

Response: Objection. See objection to question 7.a., above. In addition, the question is vague as to the point in time of the requested “recorded book value.” Without waiving these objections, and in an effort to provide responsive information, Great Oaks states that the original Rahway pipeline was installed in 1977 and it has no remaining book value.

8. Account 343- Transmission and Distribution Mains

A. 21-07-001 Exhibit G states “Expected investments in this account are estimated based upon the average of investments from 2016 through 2020, with a twenty-five percent mark-up due to increasing costs in the Bay Area.”

- a. Provide the supporting data for the 25% factor stated above.

Response: The projected cost in this asset category is based upon the average of CY 2016 through CY 2016 investments in this asset category, plus Bay Area cost increases. The Bay Area cost increases are estimated to be 25% based upon articles read by Great Oaks’ Chief Financial Officer during the time period the workpapers and application were being prepared. Those articles stated that construction costs over the previous 12 months had risen by 20% to 30%. Great Oaks used 25% because that is the same value used in its 2018 General Rate Case that was accepted by the Commission and the Public Advocates Office.

9. Account 345- Services

A. 21-07-001 Exhibit G states “Each year the Company installs new services. The projected cost of the new service installations is based upon an average of investment costs from 2017 through 2020, with a nineteen percent markup to cover rising costs in the Bay Area.”

- a. Provide the supporting data for the 19% factor stated above.

Response: The projected cost in this asset category is based upon the average of CY 2017 through CY 2020, plus Bay Area cost increases. See response to question 8.a., above, for

information on such cost increases. Great Oaks used 19% because that is the same value used in its 2018 General Rate Case that was accepted by the Commission and the Public Advocates Office.

VERIFICATION

I, Ron Ceolla, am Chief Financial Officer for Great Oaks Water Company. I have read Great Oaks Water Company's Responses to Cal Advocates Data Request DG-009 and know the contents thereof. I certify that the Responses are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 21, 2021.

/S/
Ron Ceolla

Objections

The objections made to Data Request DG-009, including Great Oaks Water Company's General Objections to Data Requests, are made by the undersigned, as counsel for Great Oaks Water Company.

Date: September 21, 2021

/S/
Timothy S. Guster