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## MEMORANDUM

1           The Public Advocates Office at the California Public Utilities Commission (“Cal  
2 Advocates”) has examined the application, data request responses, and other information  
3 presented by Golden State Water Company in Application (A.) 23-08-010. In this  
4 prepared testimony, Cal Advocates provides the California Public Utilities Commission  
5 (“Commission” or “CPUC”) with recommendations in the interests of ratepayers for safe  
6 and reliable service at the lowest cost. Mehboob Aslam is Cal Advocates project lead for  
7 this proceeding. Victor Chan is the oversight supervisor, and Crystal Yu and Brett Palmer  
8 serve as Cal Advocates’ legal counsels.

9           Cal Advocates has made the best effort to comprehensively review, analyze, and  
10 provide the Commission with recommendations on each ratemaking and policy aspect  
11 presented in the Application. The absence from Cal Advocates’ testimony of any issue  
12 connotes neither agreement nor disagreement of the underlying request, methodology, or  
13 policy position related to that issue.

14

1 **CHAPTER 1 CUSTOMER SERVICE**

2 **I. INTRODUCTION**

3 This chapter presents analysis and recommendations for Golden State Water  
4 Company’s (GSWC) customer service and reporting standards.

5 **II. SUMMARY OF RECOMMENDATIONS**

6 In order to ensure GSWC provide adequate customer service and comply with  
7 General Order (GO) 103-A standards the Commission should:

- 8 1. Require GSWC to develop and implement a plan to bring its call answer  
9 performance into compliance with GO 103-A standards before its next rate  
10 case.
- 11 2. Require GSWC to develop and implement a plan to bring its abandoned call  
12 rate into compliance with GO 103-A standards before its next rate case.
- 13 3. Require GSWC to develop and implement a plan to bring its missed scheduled  
14 appointment rate into compliance with GO 103-A standards before its next rate  
15 case.
- 16 4. Approve GSWC’s safety program that is sufficient and in compliance with the  
17 American Water Infrastructure Act (AWIA).

18 **III. ANALYSIS**

19 **A. GO 103-A Compliance**

20 GO 103-A requires annual reporting performance on customer service quality  
21 standards. GSWC has met most of the reporting standards highlighted in Appendix E of  
22 GO 103-A. Cal advocates calculated data provided by GSWC to determine telephone  
23 performance standards for the past four years (2019- 2023). Results are shown in Table  
24 1-1 below.<sup>1</sup>

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<sup>1</sup> GSWC’s Response to Cal Advocates’ Data Request SRA-004, Question 1. Attachment 1-2 at P. 14-17

1 **Table 1-1: GSWC’s Telephone Performance Standard Results per GO-103-A**

	2019	2020	2021	2022	2023
Call Answer Performance $\geq$ 80%	73%	80%	85%	58%	50%
Abandoned Call Rate $\leq$ 5%	4%	3%	2%	5.39%	7%
Scheduled Appointment Rate $\leq$ 5%	1.05%	2.68%	3.80%	4.53%	5.27%

2

3 There are three areas where GSWC fails to comply with GO 103-A standards: 1)  
4 the percentage of customers reaching a utility representative during normal business  
5 hours within 30 seconds after requesting to speak with a CSR in 2019, 2022, and 2023, 2)  
6 the percentage of calls abandoned before reaching a utility representative in 2022 and  
7 2023, and 3) the scheduled appointment performance measure in 2023.

8 First, GSWC’s ability to answer customer calls within 30 seconds during normal  
9 business hours is measured by dividing the number of calls reaching a utility  
10 representative within 30 seconds by the number of attempts to reach a utility  
11 representative.<sup>2</sup> GSWC has not been consistent in answering customer calls within 30  
12 seconds during normal business hours after customers request to speak with a CSR in the  
13 past 4 years. GSWC did not meet the GO103-A standard of 80% call answer performance  
14 in 2019, 2022, and 2023. Specifically, GSWC’s ability to answer customer calls within  
15 30 seconds was 73% in 2019, 80% in 2020, 85% in 2021, 58% in 2022, and 50% in 2023.  
16 Per Commission standards, a rate below 60% is considered substantially out of  
17 compliance.<sup>3</sup> Therefore, the Commission should require GSWC to develop and

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<sup>2</sup> GO 103-A, Appendix E P.1.

<sup>3</sup> GO 103-A, Appendix E P.1.

1 implement a plan to bring its call answer performance into compliance with GO 103-A  
2 standards before its next rate case.

3 Second, GSWC’s abandoned call rate performance is measured by dividing the  
4 number of calls abandoned by the number of attempts to reach a utility representative.<sup>4</sup>  
5 GSWC did not meet the minimum 5% or lower standard for 2022 and 2023. GSWC’s  
6 abandoned call rate performance measure was 4% in 2019, 3% in 2020, 2% in 2021,  
7 5.39% in 2022, and 7% for 2023.<sup>5</sup> The Commission should require GSWC to develop  
8 and implement a plan to bring its abandoned call rate into compliance with GO 103-A  
9 standards before its next rate case.

10 Third, GSWC’s work completion performance standards are composed of the  
11 scheduled appointment performance measure and the customer requested work  
12 completion performance measure. GSWC’s scheduled appointment performance  
13 measure is calculated by dividing the number of scheduled appointments missed with the  
14 number of scheduled appointments.<sup>6</sup> GSWC’s scheduled appointment performance  
15 measure was 1.05% in 2019, 2.68% in 2020, 3.8% in 2021, 4.53% in 2022, and 5.56%  
16 for 2023. Although GSWC met the scheduled appointment rate for prior years, the utility  
17 is currently failing to meet the standard of less than or equal to 5% in 2023. As of  
18 December 2023, GSWC’s missed scheduled appointment rate is above the 5% standard  
19 rate.<sup>7</sup> The Commission should require GSWC to develop and implement a plan to bring  
20 its missed scheduled appointment rate into compliance with GO 103-A standards before  
21 its next rate case.

22 GO-103A clearly states “consumers expect and should receive service that is  
23 consistently adequate, reliable, and in compliance with applicable water quality

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<sup>4</sup> GO 103-A, Appendix E, P.1.

<sup>5</sup> GSWC’s Response to Cal Advocates’ Data Request SRA-004, Question 4b. Attachment 1-2 at P. 17

<sup>6</sup> GO 103-A, Appendix E, P.1.

<sup>7</sup> GSWC’s Response to Cal Advocates’ Data Request SRA-004, Question 4. Attachment 1-2 at P. 17

1 standards.”<sup>8</sup> A 50% call answer performance is not adequate by established Commission  
2 standard. More troubling is the apparent trend of worsening customer service  
3 performance. Not only are the call answered performance and the abandoned call rate  
4 significantly worse in 2023, but GSWC added a third category (missed scheduled  
5 appointment rate) in which it is now also out of compliance. The Commission should  
6 require GSWC to develop and implement a plan to bring GSWC in compliance with all  
7 GO-103A customer service standards before its next rate case. Moreover, should GSWC  
8 fail to meet its Commission mandated customer service requirements, the Commission  
9 may consider imposing financial penalty on GSWC in its future GRC.

10 **B. Customer Contacts Received by CPUC’s Consumer**  
11 **Affairs Branch**

12 Cal Advocates has reviewed multiple sources to assess GSWC’s customer service  
13 performance, including GSWC’s General Rate Case (GRC) application (A.23-08-010),  
14 GSWC’s responses to Cal Advocates’ data requests, and data obtained from the  
15 Commission’s Consumer Affairs Branch (CAB). The CAB is responsible for assisting  
16 consumers with their questions and informally resolving disputes with their utility service  
17 providers. As part of the current GRC, Cal Advocates examined the CAB’s data on  
18 contacts from GSWC’s customers during the past five years (2019-2023). The Consumer  
19 Affairs Branch (CAB) categorizes customer contacts into five types. Table 1-2<sup>9</sup> below  
20 summarizes GSWC customer contacts with CAB by type from 2019 through 2023.  
21

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<sup>8</sup> GO 103-A, P.32

<sup>9</sup> “Standard Disclosures for CAB Data” CPUC Consumer Service and Information Division, revised December 12, 2023. Attachment 1-2 at P. 31



1 **Table 1-2: Contacts Received by CAB from GSWC Customers Annually**

<b>Types of Contact</b>	<b><u>2019</u></b>	<b><u>2020</u></b>	<b><u>2021</u></b>	<b><u>2022</u></b>	<b><u>2023</u></b>
Complaint	10	50	5	15	8
Informal Complaint	29	231	161	221	168
Phone Contact	72	116	132	265	66
Inquiry	N/A	N/A	N/A	N/A	2
Misdirected	1	N/A	12	6	1
Total Contacts	112	397	310	507	245

2

3 **C. Customer Complaints Received by GSWC**

4 GO-103A, Appendix E, Section 5, states that the percentage of complaints  
 5 forwarded from the CAB to the utility for resolution must be less than or equal to 0.1%<sup>10</sup>.  
 6 For complaints requiring utility investigation and response through the resolution  
 7 process, the CAB sends regulated utilities a subset of the complaints shown in Table 1-3  
 8 below. GSWC’s customer complaint resolution performance was 0.01%, 0.09%, 0.06%,  
 9 0.08%, and 0.06% in 2019, 2020, 2021, 2022, and 2023, respectively. Thus, GSWC has  
 10 met its performance measure under GO -103A in the past five years.

11  
 12  
 13  
 14  
 15

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<sup>10</sup> GO 103-A, Appendix E, P.5.

1 **Table 1-3: GSWC GO-103A Response to Regulatory Complaints Performance**  
 2 **Standard**

	2019	2020	2021	2022	2023
<b>No. of Complaints Reported to Utility<sup>11</sup></b>	29	231	161	221	168
<b>No. of Customers<sup>12</sup></b>	260,326	261,308	262,267	263,101	263,998
<b>No. of Complaints as % of No. of Customers</b>	0.01%	0.09%	0.06%	0.08%	0.06%
<b>GO-103A Compliance Status (≤ 0.1%)</b>	Compliant	Compliant	Compliant	Compliant	Compliant

4 **D. GSWC’s Safety Program**

5 The Commission should find GSWC’s safety program to be sufficient. GSWC  
 6 has an Emergency Preparedness and Response Plan (EPRP) in place. The EPRP is  
 7 available to all employees and can be shared with outside agencies.<sup>13</sup>

8 Cal Advocates has also reviewed GSWC’s compliance with the America’s Water  
 9 Infrastructure Act (AWIA), where GSWC is required to provide proof of submitting a  
 10 Risk and Resilience Assessment Certification (RRAC) to the United States  
 11 Environmental Protection Agency (EPA) for systems serving more than 3,300 people.<sup>14</sup>  
 12 GSWC submitted a Risk and Resilience Assessment Certification for Apple Valley  
 13 South, Arden Cordova, Artesia, Barstow, Bay Point, Bell Risk, Calipatria, Claremont,  
 14 Clearlake, Cordova, Cowen Heights, Culver City, Florence Graham, Hollydale, Los  
 15 Osos, Nipomo, Norwalk, Orcutt, Placentia Yorba Linda, San Dimas, Simi Valley, South

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<sup>11</sup> “Standard Disclosures for CAB Data” CPUC Consumer Service and Information Division, revised December 12, 2023. Attachment 1-2 at P. 31

<sup>12</sup> GSWC’s Minimum Data Request Section A. Basic Information P.1. Attachment 1-2 at P. 44

<sup>13</sup> GSWC’s response to Cal Advocates’ Data Request SRA-001, Question 13. Attachment 1-2 at P.6

<sup>14</sup> GSWC’s response to Cal Advocates’ Data Request SRA-001, Question 12. Attachment 1-2 at P.6

1 Arcadia, Southwest, SanGabriel, West Orange, Willowbrook, and Wrightwood customer  
2 service areas on June 25, 2021.<sup>15</sup> GSWC’s safety program meets regulatory requirements.

3 **IV. CONCLUSION**

4 The Commission should find GSWC did not meet performance standards for GO-  
5 103A, Appendix E, Section 1A (Call Answering Service Level) for years 2019, 2022 and  
6 2023, Section 1B (Abandoned Call Rate) for years 2022 and 2023, and GO-103A Section  
7 4A (Scheduled Appointment performance measure) for 2023. The Commission should  
8 require GSWC to develop and implement a plan to bring GSWC in compliance with all  
9 GO-103A customer service standards. The Commission may also consider imposing  
10 financial penalty on GSWC if it continues to fail to comply with GO-103A standards in  
11 its future GRC.

12

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<sup>15</sup> GSWC’s response to Cal Advocates’ Data Request SRA-001, Question 12. Attachment 1-2 at P.6



- 1           2. Deny GSWC’s claims that the Placentia Yorba Linda System Drought  
2           Tolerant Landscaping benefits ESJ communities by helping to address  
3           water conservation and improve customer communication.
- 4           3. Deny GSWC’s claims that the San Dimas and Simi Valley System benefits  
5           the ESJ communities by helping to address water conservation and improve  
6           customer communication.
- 7           4. Deny GSWC’s claims that the Simi Valley Urban Water Management Plan  
8           benefits the ESJ communities by addressing water conservation.

### 9   **III. ANALYSIS**

10           Environmental justice means the fair treatment of people of all races, cultures and  
11           incomes concerning the development, adoption, implementation and enforcement of  
12           environmental laws, regulations, and policies<sup>17</sup>. As some communities in California face  
13           barriers in accessing safe and affordable utility services, it is important for GSWC to take  
14           measures and address inequalities in its service area to bring safe and reliable water  
15           service to its customers.

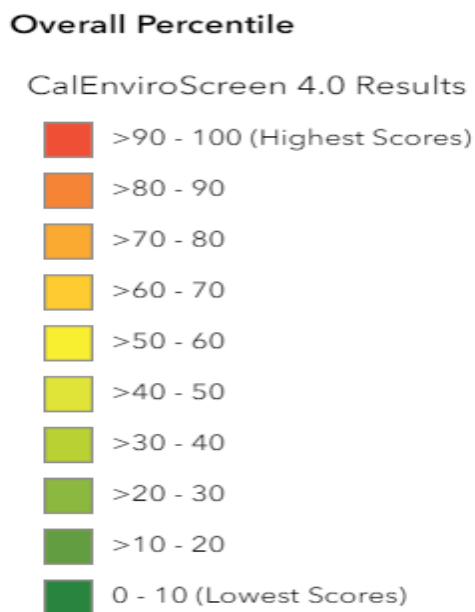
#### 16           **A. CalEnviroScreen 4.0 Tool**

17           Cal Advocates uses the CalEnviroScreen 4.0 tool to identify impacts of GSWC’s  
18           planned projects on the ESJ communities. The CalEnviroScreen 4.0 tool assists the  
19           Commission’s commitment to advance equity and environmental justice for low-income  
20           communities, communities of color, tribal nations, and other disadvantaged groups in an  
21           effort to eliminate discriminatory practices, inequities in decision making, disinvestment,  
22           poverty and other socioeconomic factors that magnify the effects of pollution in these  
23           communities. The overall percentile represents a census tract’s overall score of intensity  
24           in pollution burden that ranges from 0% to 100%, with low intensity in population and

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<sup>17</sup> Environmental & Social Justice Action Plan – Version 2.0. <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf>

1 pollution.<sup>18</sup> The ESJ disadvantaged communities are defined as having scored in the 75-  
2 100% range as shown in Figure 2-1 below;



3 **Figure 2-1 CalEnviroScreen 4.0 Overall Percentile Results<sup>19</sup>**

4 For example, GSWC communities that fall below the 75-100% range include  
5 Clearlake, Bay Point, Barstow, Pomona, Compton, Norwalk, Hawthorne, Huntington  
6 Park, Lynwood, etc. These communities are predominately consisted of people of color  
7 or low income, and they likely lack the financial and technical capabilities to comply  
8 with environmental regulations. In GSWC’s goals of aligning with the Commission’s  
9 ESJ Action plan, GSWC proposes to reduce Greenhouse Gas (GHG) emissions, mitigate  
10 climate change and weather effects, improve water conservation and customer  
11 communication, provide safe and reliable service to all customers, ensure water supply,

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<sup>18</sup> SB 535 Disadvantaged Communities. <https://oehha.ca.gov/calenviroscreen/sb535>. The term SB 535 Disadvantaged Communities refer to communities specifically targeted for investment of proceeds from the state’s Cap-and-Trade Program. These investments are aimed at improving public health, quality of life and economic opportunity in California’s most burdened communities, and at the same time, reducing pollution that causes climate change.

<sup>19</sup> CalEnviroScreen 4.0 January 20,2024. <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>. February 9,2024

1 build resilient operations to meet customer service expectations, improve public safety  
2 projects by reducing the risk of groundwater contamination, improve diversity and  
3 inclusion, offer customer assistance programs to help low income and disadvantaged  
4 households, and ensure customers receive quality water on a daily basis.<sup>20</sup> GSWC  
5 proposes to comply with such measures to meet the Commissions ESJ goals 2 and 3 by  
6 providing a list of capital projects purported to benefit ESJ communities.<sup>21</sup> While Cal  
7 Advocates supports some of these projects, the Commission should reject GSWC’s  
8 claims that its proposed projects will benefit ESJ communities. As specified below, Cal  
9 advocates analysis utilizes the CalEnviroScreen 4.0 overall percentiles indicator to assess  
10 the Holabird Plant in Calipatria, the Kiowa Plant in Apple Valley South, the Placentia-  
11 Yorba Linda System’s Drought Tolerant Landscaping, the San Dimas Water  
12 Management Plan 2025, and the Simi Valley System 2025 Urban Water Management  
13 Plan.

#### 14 **1. The Holabird Plant in Calipatria**

15 According to GSWC, The Holabird Plant in Calipatria meets ESJ goal #2 which  
16 aims to reduce GHG emissions, reduce pumping, optimize operations, and procure more  
17 renewable power for solar generation.<sup>22</sup> As shown in Figure 2-2 below, Calipatria is  
18 situated in region 3, an SB 535 Disadvantaged Community with a CalEnviroScreen 4.0  
19 percentile of 82%. While the Holabird Plant in Calipatria meets the ESJ communities  
20 high CalEnviroScreen 4.0 percentile, Cal advocates recommends that the Commission

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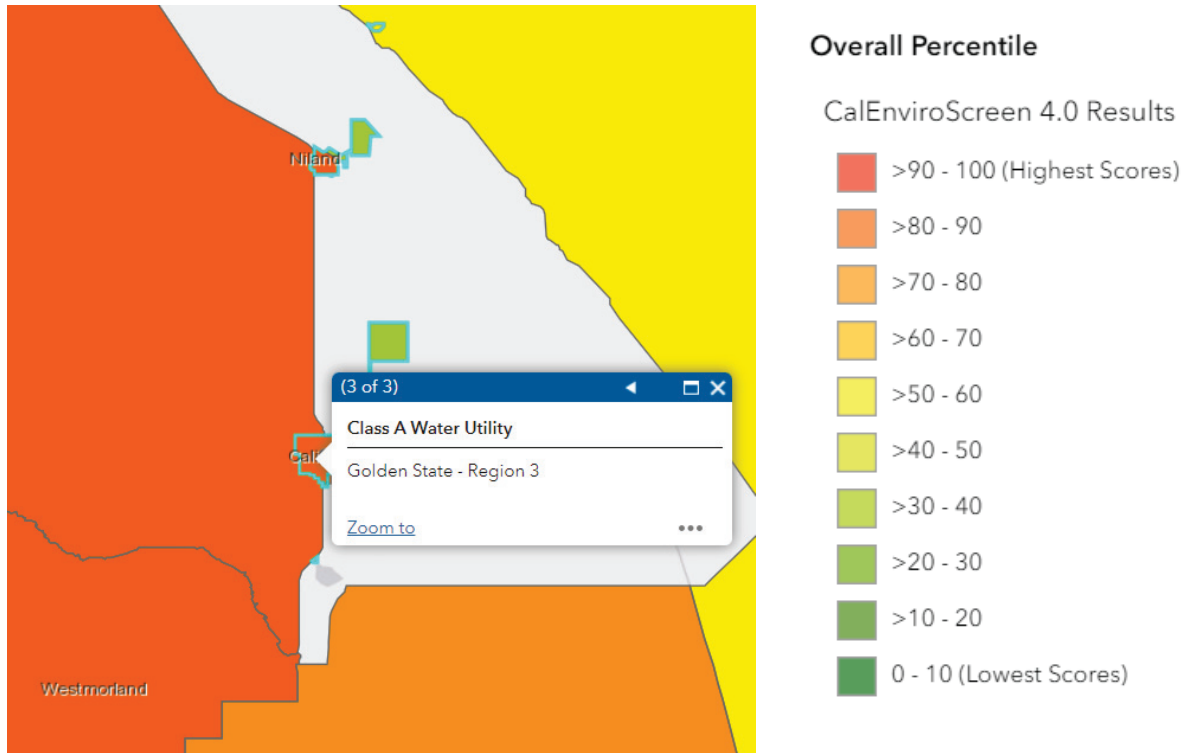
<sup>20</sup> GSWC’s response to Cal Advocates’ Cal Advocates Data Request SRA-006, Question 1. Attachment 2-1 at P.21

<sup>21</sup> GSWC’s response to Cal Advocates’ Cal Advocates Data Request SRA-006, Question 1. Attachment 2-1 at P. 15

<sup>22</sup> GSWC’s response to Cal Advocates’ Cal Advocates Data Request SRA-006, Question 1. Attachment 2-1 at P. 15

1 deny this project based on a lack of necessary cost benefit analysis, and the fact that a  
2 previously built solar generation project is non-operational.<sup>23</sup>

3 **Figure 2-2 CalEnviroScreen 4.0 Percentile in Calipatria**



4 **2. The Kiowa Plant in Apple Valley South**

5 According to GSWC, the Kiowa Plant, (Apple Valley South) solar generation  
6 plant meets goal 2 of the ESJ Action Plan to help reduce GHG emissions and procure  
7 more renewable power.<sup>24</sup> GSWC's Apple Valley Region as shown in Figure 2-3  
8 currently serves 2,900 customers and has a Cal EnviroScreen 4.0 percentile of 30%.  
9 However, the Apple Valley percentile does not fall within the boundaries of a  
10 disadvantaged community, therefore GSWC's request of the Kiowa Plants solar

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<sup>23</sup> Cal Advocate Report on Capital Project Cost Estimates and Cost Adders and Region III Capital Projects Forecast and Early Retirement Testimony, P.2-22 Lines 8-11 (Sari Ibrahim).

<sup>24</sup> GSWC's response to Cal Advocates' Cal Advocates Data Request SRA-006, Question 1. Attachment 2-1 at P. 15

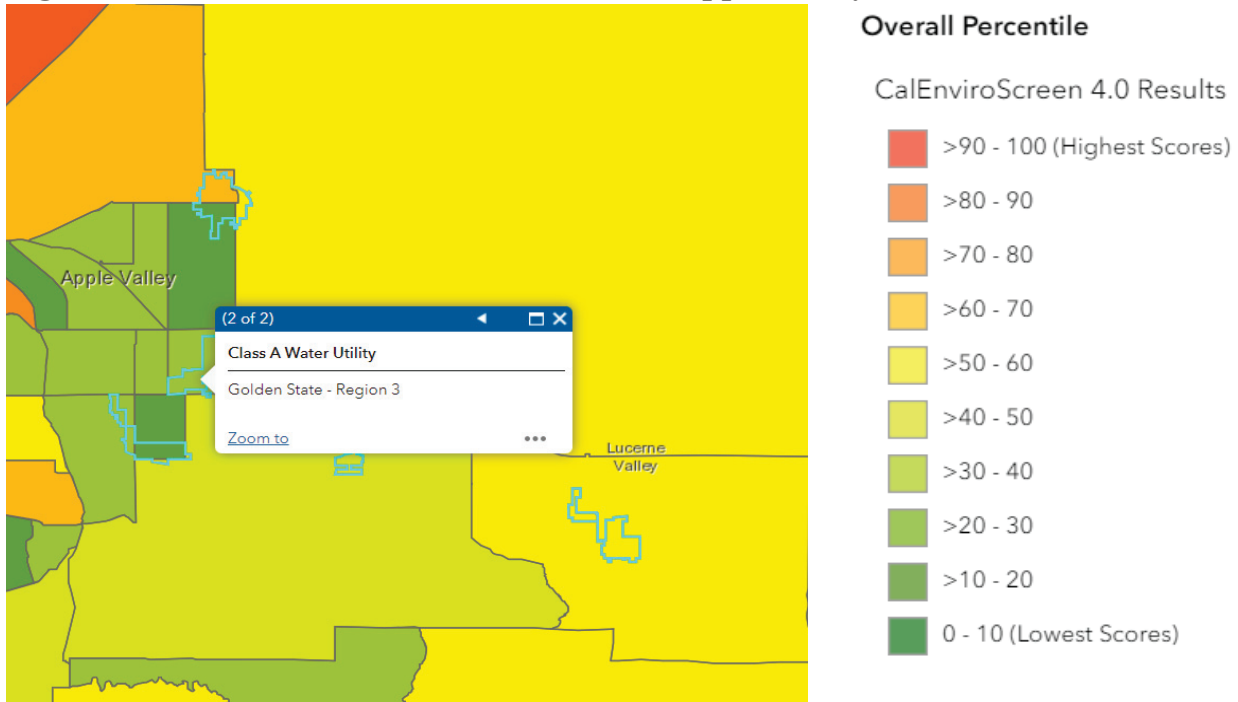


1 generation project does not qualify as an ESJ project under the Commission’s ESJ Action  
2 Plan. Cal Advocate recommends that the Commission deny this project due to lack of  
3 cost benefit analysis and the fact that GSWC already has a solar generation facility at the  
4 Mohawk plant site in the Apple Valley System that is no longer used. <sup>25</sup>

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<sup>25</sup> GSWC’s response to Cal Advocates’ Cal Advocate Testimony Report on Capital Project Cost Estimates and Cost Adders and Region III Capital Projects Forecast Early Retirements and Rate base. Sari Ibrahim

1 **Figure 2-3 CalEnviroScreen 4.0 Percentile in Apple Valley<sup>26</sup>**



2

3 **3. The Placentia-Yorba Linda System Drought**  
4 **Tolerant Landscaping**

5 According to GSWC, the Placentia Yorba Linda’s Drought Tolerant project as  
6 shown in Figure 2-4 aligns with ESJ goal #3 to help address water conservation and  
7 improve customer communication and education.<sup>27</sup> Placentia has a CalEnviroScreen 4.0  
8 percentile of 60%, indicating the region is not in an SB 535 Disadvantaged Community.  
9 GSWC’s basis for the “drought tolerant” landscaping is the justification that they must  
10 replace their turf landscaping with drought tolerant landscaping to lower its water usage  
11 and assist in achieving California’s water saving goals.<sup>28</sup> However, Cal advocates

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<sup>26</sup> Cal Advocates Class A Water Utility Service Areas.  
<https://capuc.maps.arcgis.com/apps/webappviewer/index.html?id=d843af0171de4938aaed3c474183f348>.  
February 9,2024

<sup>27</sup> GSWC’s response to Cal Advocates’ Data Request SRA-006, Question 3. Attachment 2-1 at P. 16

<sup>28</sup> \$132,500 in the Placentia system Capital Testimony P. 205 line 5, \$265,300 in the Claremont System Capital Testimony p. 211 line 19, \$316,500 in the South Arcadia System Capital Testimony P. 232 line

1 recommends that there are several rebate programs for businesses and residents in  
2 California to replace their turf with drought tolerant landscaping.<sup>29</sup> For example, the  
3 Municipal Water District of Orange County offering \$3 per square foot for replaced turf.<sup>30</sup>  
4 Cal advocates recommends that the Commission deny the budget for the drought tolerant  
5 landscaping especially when GSWC's claims of the project meeting ESJ goal #3 is  
6 inaccurate.<sup>31</sup>

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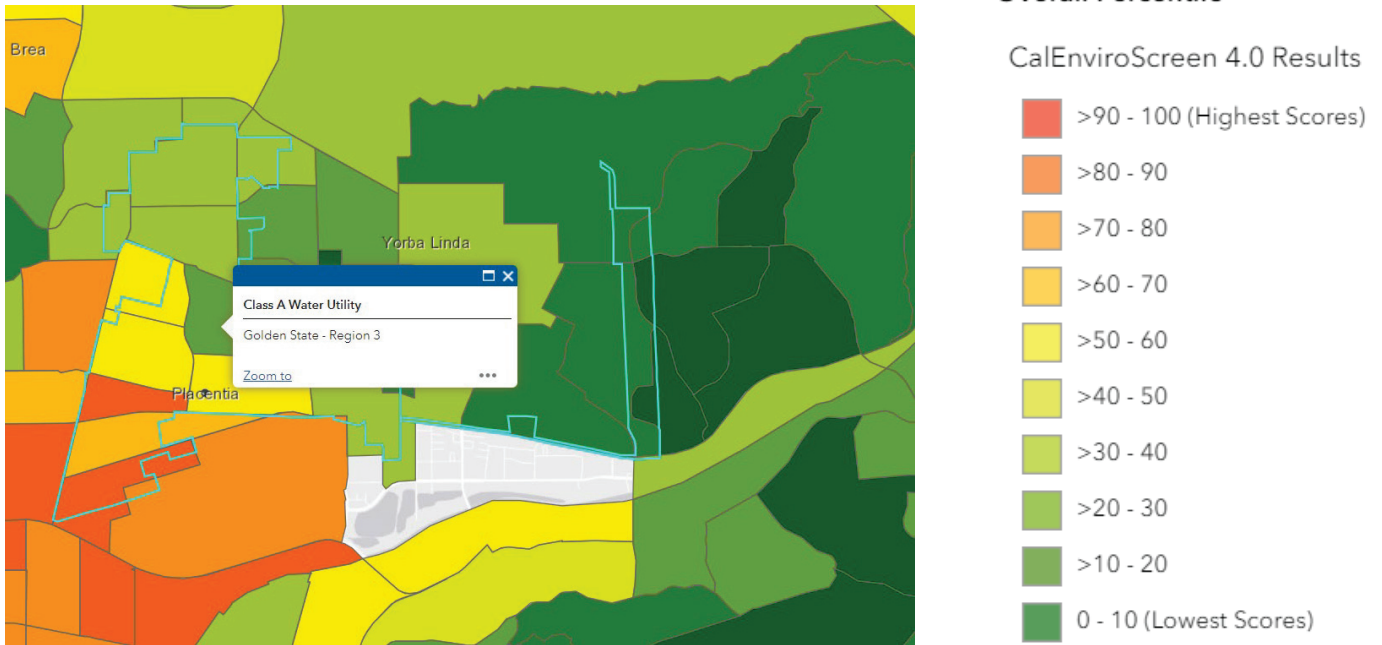
18, and \$371,100 in the West Orange system Capital Testimony P.178 line 18.

<sup>29</sup> <https://www.gov.ca.gov/2022/09/28/california-is-making-it-cheaper-to-replace-your-lawn-to-save-water-and-save-money/>.

<sup>30</sup> <https://www.mwdoc.com/save-water/rebates/residential-rebates/turf-removal/>.

<sup>31</sup> Cal Advocate Testimony Report on Capital Project Cost Estimates and Cost Adders and Region III Capital Projects Forecast Early Retirements and Rate base. Sari Ibrahim P. 2-18 Lines 14-19.

1 **Figure 2-4 CalEnviroScreen 4.0 Percentile in Placentia<sup>32</sup>**



2 **4. The San Dimas System, 2025 Urban Water**  
3 **Management Plan**

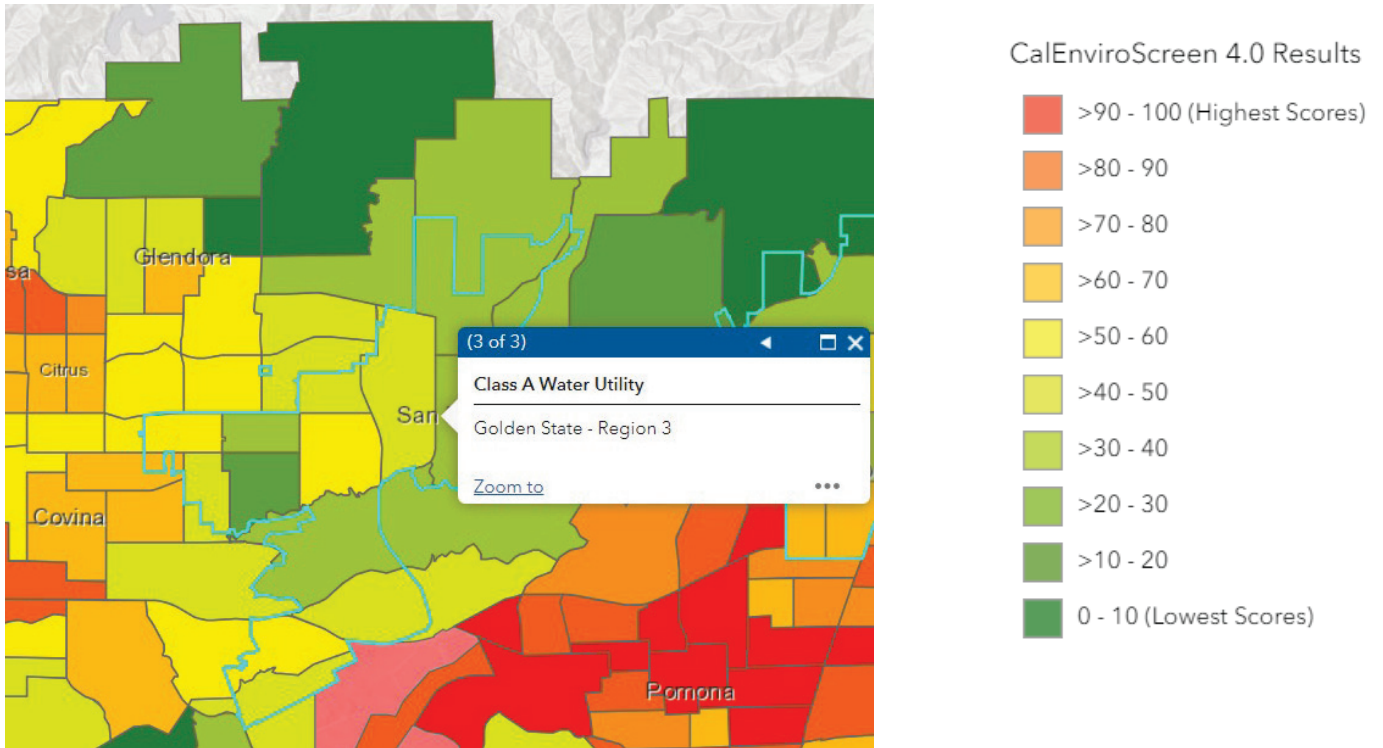
4 The San Dimas Urban Water Management Plan Project is in Region- III of  
5 GSWC within the San Dimas System. The region as shown in Figure 2-5 has a  
6 CalEnviroScreen 4.0 percentile score of 36%. According to GSWC, The San Dimas  
7 System, Urban Water Management Plan meets ESJ goal #3 by helping to address water  
8 conservation and improve customer communication and education.<sup>33</sup> The region's score  
9 of 36% falls below the 75-100% percentile of being a disadvantaged community.  
10 Therefore, GSWC's claims of the San Dimas System, 2025 Urban Water Management  
11 Plan project does not qualify as an ESJ Project.

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<sup>32</sup> Cal Advocates Office, Class A Water Utility Service Areas.  
<https://capuc.maps.arcgis.com/apps/webappviewer/index.html?id=d843af0171de4938aaed3c474183f348>.  
February 9,2024

<sup>33</sup> GSWC's response to Cal Advocates' Data Request SRA-006, Question 3 Attachment 2-1 at P. 16

1 **Figure 2-5 CalEnviroScreen 4.0 Percentile in San Dimas** <sup>34</sup>



2

3 **5. The Simi Valley System 2025 Urban Water**  
4 **Management Plan**

5 The Simi Valley System 2025 Urban Management Plan falls under the Simi  
6 Valley Service Area in Region-III. The Simi Valley Service Area as shown in Figure 2-6  
7 has a CalEnviroScreen 4.0 Percentile of 45% which is below the 75-100% range of a  
8 disadvantaged community. GSWC requests \$80,000 of a proposed budget for the Simi  
9 Valley System's Urban Water Management Plan in hopes of meeting goal 3 of the  
10 commissions ESJ action plan to help address water conservation and improve customer  
11 communication and education.<sup>35</sup> GSWC cannot substantiate that the project meets ESJ

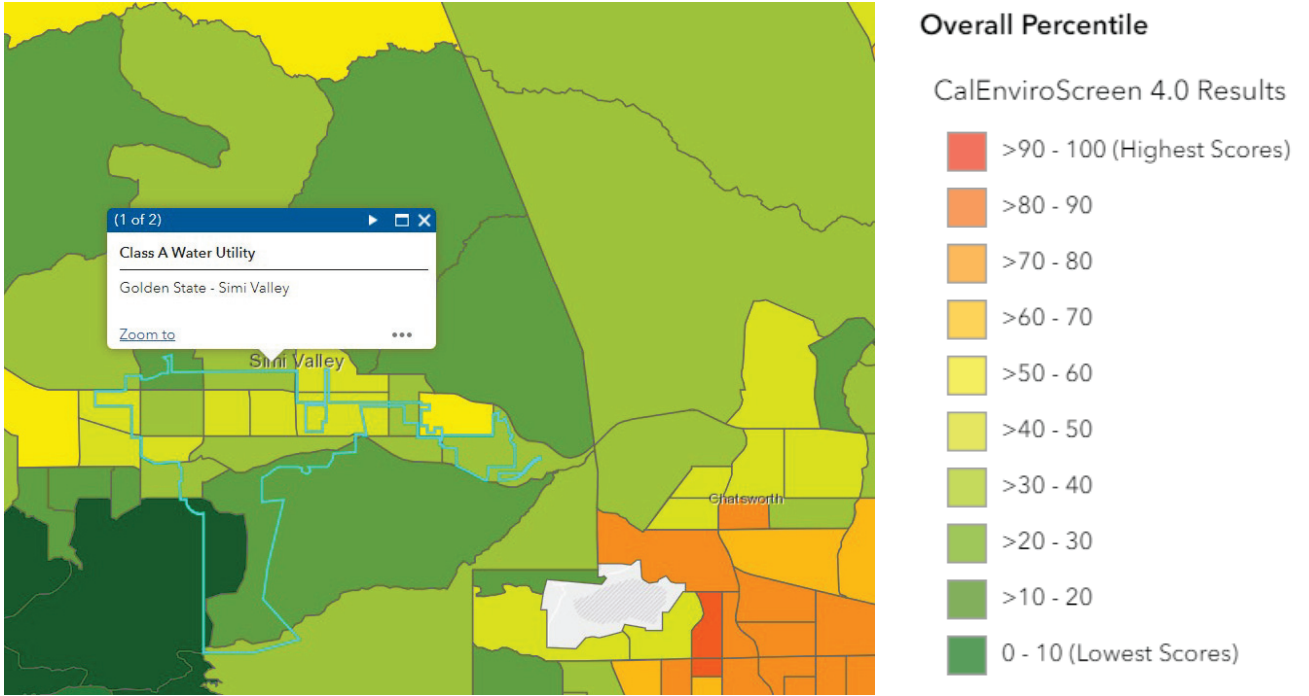
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<sup>34</sup> CPUC Public Advocates Office, Class A Water Utility Service Areas.  
<https://capuc.maps.arcgis.com/apps/webappviewer/index.html?id=d843af0171de4938aaed3c474183f348>.  
February 9,2024

<sup>35</sup> Cal Advocate's Report on Recommendations on Region 1 (Arden Cordova, Bay Point, Clearlake, Los  
2-10

1 Action Plan goals as the area is not situated in an SB 535 disadvantaged community.  
2 Therefore, contrary to GSWC’s claims, Simi Valley’s Urban Management Plan does not  
3 qualify as an ESJ Project.

4 **Figure 2-6 CalEnviroScreen 4.0 Percentile in Simi Valley<sup>36</sup>**



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#### 6 **IV. CONCLUSION**

7 GSWC identifies several of its projects and claims that they meet the  
8 Commission’s ESJ Action Plan goals. However, further analysis shows that these  
9 projects do not necessarily benefit the ESJ communities, and in a few cases could  
10 negatively impact customers financially. The Commission should deny GSWC’s claims

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Osos, Santa Maria, Simi Valley Testimony, Susana Nasserie), at 2, Lines 11-12. Attachment 2-1 at P. 16

<sup>36</sup> Cal Advocates Office, Class A Water Utility Service Areas.  
<https://capuc.maps.arcgis.com/apps/webappviewer/index.html?id=d843af0171de4938aaed3c474183f348>.  
February 9,2024

1 that the identified projects benefit the ESJ communities, and instead direct GSWC to  
2 consider alternate options to further goals for the ESJ Action Plan.

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1 **CHAPTER 3 ROBBINS SYSTEM CONSULTING &**  
2 **MAINTENANCE EXPENSES**

3 **I. INTRODUCTION**

4 This chapter presents Cal Advocates’ analyses and recommendations for GSWC’s  
5 expense estimates for Robbins System’s (Robbins) consulting and maintenance repair  
6 expenses incurred since acquisition. GSWC acquired the Robbins Water System as part  
7 of the Arden Cordova Rate Making Area (RMA) on May 1, 2022, with 95 connections.<sup>37</sup>

8 **II. SUMMARY OF RECOMMENDATIONS**

9 Cal Advocates recommends that the Commission:

- 10 1. Reduce Robbins’ additional maintenance expenses of \$18,706 to  
11 \$6,680 based on the adjusted historical five-year history average;  
12 and  
13 2. Deny any additional proposed consulting expenses.

14 **III. ANALYSIS**

15 **A. Additional Maintenance Expenses for Robbins**

16 As Robbins is part of the Arden Cordova Rate Making Area (RMA), the escalated  
17 five-year average of meter, pump, and leak expenses are derived from the Arden Cordova  
18 Maintenance adjustments. GSWC escalates \$56,435 in five years for meter, \$26,914 for  
19 pump, and \$13,617 for leaks.<sup>38</sup> In addition to the five-year escalated average, GSWC  
20 proposes an additional \$18,706 expense estimates, of which \$4,000 allocated for meter,  
21 \$5,076 for pump, and \$9,630 for leaks.<sup>39</sup> Per the prepared testimony of Marcus Gomez,

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<sup>37</sup> GSWC’s response to Cal Advocates’ Request SRA-002, Question 6. Attachment 3-1 at P. 4

<sup>38</sup> GSWC’s response to Cal Advocates’ Data Request SRA-003 Question 1-AC Maintenance Excel sheet. P.1. Attachment 3-1 at P.41

<sup>39</sup> GSWC’s response to Cal Advocates’ Data Request SRA-005 Question 5a, 5b, 5c. Attachment 3-1 at P. 44



1 GSWC testifies that the additional \$18,706 to the Arden Cordova RMA inflation adjusted  
 2 five-year historic amount is a forecast of expected additional maintenance within the  
 3 water system due to addition of Robbins System.<sup>40</sup> Cal Advocates requested GSWC to  
 4 provide an overview of the repairs and costs incurred by GSWC since the Robbins  
 5 Acquisition from May 1, 2022, to August 31, 2023.<sup>41</sup> In response, GSWC provided  
 6 maintenance expenses (WUDF 787 & 788) including labor & benefits, planned  
 7 maintenance, unplanned maintenance, vehicle expenses, equipment and permits incurred  
 8 a total of \$31,237.<sup>42</sup> The details of these expenses are shown in Table 3-1 below.<sup>43</sup>

9 **Table 3-1: Robbins Maintenance Expenses July 2022 - July 2023**

<u>Category</u>	<u>Amount</u>
Mains	\$12,706
PP: Pump	\$7,012
WT - Structures	\$4,001
PP - Other	\$3,300
WT - Chem	\$3,079
PP - Booster	\$674
WT - Other	\$247
Meters	\$139
Intakes	\$48

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<sup>40</sup> GSWC’s Prepared Testimony of Marcus Gomez at P.13, lines 1-5.

<sup>41</sup> GSWC’s response to Cal Advocates’ Data Request SRA-002, Question 3. Attachment 3-1 at P. 3

<sup>42</sup> GSWC’s response to Cal Advocates’ Data Request SRA-002, Question 3. Attachment 3-1 at P. 3

<sup>43</sup> GSWC’s Response to Cal Advocates’ Data Request, SRA-002, Question 3. Attachment 3-1 at P. 3

Hydrants	\$33
<b>Total</b>	<b>\$31,237<sup>44</sup></b>

1  
2 With respect to the frequency of meter repairs for Robbins, GSWC responded to  
3 Cal Advocates that no repairs had been completed since acquisition date of May 1, 2022,  
4 to August 31, 2023.<sup>45</sup> GSWC further stated that no new meters had been installed nor  
5 reported broken from May 1, 2022, to August 31, 2023.<sup>46</sup> Cal Advocates also inquired  
6 into whether GSWC conducted a leak survey for Robbins from July 1, 2022, to July  
7 2023. GSWC informed Cal advocates that 2 leak surveys were conducted in October  
8 2022 and May 2023 by the American Leak Detection.<sup>47</sup> The American Leak Detection  
9 provided a finalized report of its comprehensive survey of the distribution network at  
10 Robbins System and advised that no leaks were located, which indicates that the network  
11 is in good serviceable condition with no known defects.<sup>48</sup> Cal Advocates conducted  
12 discovery into the additional \$18,706 since the Robbins acquisition examined that GSWC  
13 has only spent \$139 on meter maintenance, \$5,076 on Pump and \$1,465 on Leak  
14 maintenance expenses.<sup>49</sup> GSWC spent only \$6,680 additional maintenance expenses for  
15 Robbins since its acquisition in May 2022 till August 2023.

16 Accordingly, GSWC’s proposed additional maintenance expense of \$18,706 is  
17 excessive and are not supported by its past level of maintenance expenditures for Robbins

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<sup>44</sup> GSWC’s Response to Cal Advocates’ Data Request, SRA-002, Question 3. Attachment 3-1 at P. 3

<sup>45</sup> GSWC’s Response to Cal Advocates’ Data Request, SRA-002, Question 6. Attachment 3-1 at P. 4

<sup>46</sup> GSWC’s Response to Cal Advocates’ Data Request, SRA-002, Question 6. Attachment 3-1 at P. 4

<sup>47</sup> GSWC’s Response to Cal Advocates’ Data Request SRA – 002 Question 4. Attachment 3-1 at P. 4

<sup>48</sup> GSWC’s Response to Cal Advocates’ Data Request, American Leak Detection Q4 Leak Survey Report\_May 2023.pdf. Attachment 3-1 at P. 11

<sup>49</sup> GSWC’s Response to Cal Advocates’ Data Request, SRA-002, Question 3. Attachment 3-1 at P. 3

1 therefore, Cal Advocates recommendation of \$6,680 is more reasonable and is supported  
2 by the actual recorded maintenance activities.

3 **B. Additional Consulting Expenses**

4 GSWC requests an additional \$8,500 as an added expense to the inflation adjusted  
5 five-year historical average estimates for Arden Cordova RMA.<sup>50</sup> GSWC claims that it  
6 must continue its consulting engagements to evaluate the existing Robbins systems where  
7 improvements can be made to ensure it continues to be in good standing.<sup>51</sup> Cal Advocates  
8 requested GSWC to provide an estimated expense related to consulting and the Regional  
9 Water Authority's (RWA) participation as it relates to Robbins.<sup>52</sup> In response, GSWC  
10 stated that the RWA expense does not directly relate to Robbins system but that the  
11 additional \$8,500 adjustment requested has been calculated to bring the forecasted  
12 expenses more in line with recent costs.<sup>53</sup> GSWC has not incurred any expenses for  
13 consultation services directly related to Robbins.<sup>54</sup>

14 Based on the foregoing discussion, the Commission should deny additional  
15 consulting expenses for Robbins as GSWC has not incurred any consulting expenses for  
16 Robbins since its acquisition, nor has GSWC justified a need to have such consulting  
17 needs going forward for Robbins. The past five-year historic costs for Arden Cordova  
18 include past consulting fees and are thus already taken into account in forecasting Arden  
19 Cordova's expenses, which now includes the Robbins System.

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<sup>50</sup> GSWC Prepared Testimony, Marcus Gomez P. 20, lines 10-15

<sup>51</sup> GSWC Prepared Testimony, Marcus Gomez P. 23, lines 13-14

<sup>52</sup> GSWC Response to Cal Advocates' Data Request, SRA-003, Question 2. Attachment 3-1 at P. 18

<sup>53</sup> GSWC Response to Cal Advocates' Data Request, SRA-003, Question 2c. Attachment 3-1 at P. 18

<sup>54</sup> GSWC Response to Cal Advocates' Data Request, SRA-003, Question 2c. Attachment 3-1 at P. 18

1 **IV. CONCLUSION**

2           The Commission should deny GSWC’s request for an additional expense of  
3 \$18,706 for the Robbins and instead allow \$6,680. The Commission should also deny  
4 the additional expense of \$8,500 for consulting for the Robbins System. Robbins falls  
5 under the Arden Cordova RMA for which the consulting fees are duly considered for  
6 forecasting purposes.

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1 **Attachment 1-1: Qualifications of Witness**

**QUALIFICATIONS AND PREPARED TESTIMONY**

**OF AMA SERWAA**

Q.1 Please state your name and address.

A.1 My name is Ama Serwaa. My business address is 320 W 4<sup>th</sup> Street, Los Angeles, CA 90013.

Q.2 By whom are you employed and what is your job title?

A.2 I am employed by the Public Advocates Office at the California Public Utilities Commission as a Public Utilities Regulatory Analyst.

Q.3 Please describe your educational and professional experience.

A.3 I received my Bachelor's degree in Political Science and Public Policy Minor from the University of California, Riverside in 2016. I also received my Master's degree in Public Administration, Public Sector Leadership and Management at the California State University, Northridge in 2023. I was employed by the California Public Utilities Commission in July 2023.

Q.4 What is your area of responsibility in this proceeding Golden State Water Company GRC A. 23-08-010?

A.4 I am responsible for the preparation of the Report and Recommendations on Customer Service, Environmental Social Justice Action Plan and Robbins Maintenance and Consulting Expenses.

Q.5 Does that complete your prepared testimony?

A.5 Yes.

# Attachment 1-2: Customer Service Responses

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August 30, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-001 (A.23-08-010)  
Due Date: August 30, 2023      Extension Due Date: September 5, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

On April 30th, 2020, GSWC submitted the report, Measures to Improve Customer Service from January to December 2019. In the past, GSWC provided similar reports for the years 2015 to 2019. Has GSWC created any similar reports for any of the years 2020, 2021, 2022, or 2023? If so, please provide all reports for these years. If GSWC did not create additional reports, please confirm.

**Response 1:**

GSWC prepared similar reports for 2020 and 2021, which are attached. GSWC did not create reports for 2022 or 2023. Refer to PDFs titled "**SRA-001 Q.1 Measures to Improve Customer Service\_Jan to Dec\_2020**" and "**SRA-001 Q.1 Measures to Improve Customer Service\_Jan to Dec\_2021**".

**Question 2:**

The CPUC has created the Environmental and Social Justice (ESJ) Action Plan to serve as a commitment to furthering ESJ principles. Has GSWC created any measures for environmental social justice to date? If so please provide the details. If GSWC has not created any measures, please confirm.

**Response 2:**

Golden State Water Company (GSWC) has the following initiatives related to Environmental Social Justice.

**1. Reducing Greenhouse Gas (GHG) emissions**

We studied our GHG emissions levels, set a 2020 baseline, and developed a GHG emissions reduction target of 60% by 2035 from the 2020 baseline. In 2022, GSWC adjusted its electricity purchasing practices to procure more renewable power than in the past. Estimates demonstrate that this will reduce annual Scope 2 emissions, on our way to a goal of reducing Scope 1 and 2 emissions by 60% by 2035.

**2. Mitigating climate change and weather effects**

Over the last three years, GSWC has identified critical water production sites, treatment plants, and pumping plants that could be prone to Public Safety Power Shutoff (PSPS) actions. PSPS allows large power grid operators to de-energize the power grid when weather forecasts predict periods of high winds in areas with low humidity and unmanaged underbrush. Continuing to build resiliency into our service delivery in the face of numerous climate risks is more critical than ever – and consistent with the State’s 2020 Water Resilience Portfolio mandates.

**3. Water conservation and customer communication/education**

As the drought has continued to challenge California, our conservation rate structure, communication and education initiatives have paid off. Since 2007, GSWC customers have cooperatively chosen to cut their water usage per customer by 36.5%.

**4. Providing safe and reliable service to all customers**

GSWC continues to invest to improve water reliability and to reduce water loss throughout our systems, including investments in environmental control facilities.

**5. Ensuring water supply**

We are focused on consistently improving our resiliency and water supply diversification through groundwater infrastructure improvements, which will help meet the needs of our communities with valuable local water supply and ensure that high quality groundwater supplies are available for future generations.

**6. Uninterrupted water supply**

Our objective to build increasingly resilient operations to meet customer service expectations is reflected in multiple projects, including implementation of backup power generation in several locations and renewable power generation to help best meet water supply demands during the summer months when the risk of extended electrical power outages is high. Additionally, our ongoing pipeline management program focuses on the timely replacement of aged pipelines to mitigate the risk of service interruptions due to age related pipeline failures.



## **7. Public safety**

Numerous public safety projects are a focus for the company, including our commitment to site remediation (reducing the risk of groundwater contamination and protecting aboveground water infrastructure from damage due to wildfires), the deployment of “smart” water tools such as water quality analyzers (alerting water operators to unusual system activity in a timely manner), and water main flushing (improving water quality with reduced water loss).

## **8. Supplier diversity**

Golden State Water’s spending with diverse suppliers increased to 33.7% in 2022, exceeding the CPUC’s target of 22.0% for the tenth consecutive year.

## **9. Engaging with our communities**

GSWC continues to emphasize community engagement and were grateful to see the increase in live events for 2022. We were able to double our community service hours at GSWC. Continuing the successful utilization of social media platforms, online venues and meetings developed during the pandemic, we continued to engage customers and community leaders in these expanded venues. We have also consistently made charitable contributions to non-profit organizations.

## **10. Diversity & Inclusion**

GSWC seeks to promote the benefits of diversity in all of our business activities and oppose discrimination of any kind with a nondiscrimination policy and Diversity & Inclusion Policy.

## **11. Affordable access to water**

GSWC is committed to balancing the goal of providing the highest quality and reliability of water service with the overall cost of service to our customers, subject to applicable federal and state laws and regulations, and orders of regulatory bodies. The Board of Directors has adopted a policy of providing access to safe, clean and affordable water adequate for human consumption, cooking, and sanitary purposes in all states in which we operate.

## **12. Low-income or disadvantaged assistance programs**

At GSWC, we offer customer assistance programs to help low-income or disadvantaged households pay for water services, as well as protection for qualified military personnel during periods of full-time deployment. We also offer payment plans to our customers, giving them options to make smaller payments on outstanding bills without incurring penalties. We continue to promote participation in the Low Income Household Water Assistance Program (LIHWAP). In 2022, we also received \$9.5M from the California Water and Wastewater Arrearage Program

(CWWAPP) and applied the funds to COVID related past due balances to approximately 19,000 accounts.

**13. Providing economic benefits to low-income and disadvantaged communities**

Through our investments in capital infrastructure, as well as ongoing operations, GSWC generates significant economic benefits to the local and regional economies where we do business. GSWC employs over 500 employees in the state, providing jobs as well as the indirect economic effects that result.

**14. Water quality for all customers**

GSWC ensures our customers receive quality water that they consume and use on a daily basis. That is our focus and we've devoted significant resources to do so. High quality water is essential to our customer's health and the trust they place in us as their water provider.

**Question 3:**

GSWC published a Corporate Social Responsibility Report in 2019 as advertised on the American States Water website. Did GSWC publish any Corporate Social Responsibility Report for the years 2020,2021,2022, or 2023? If so please provide all reports for these years. If GSWC did not create these additional reports, please confirm.

**Response 3:**

A 2020-2021 ESG report (formerly titled Corporate Social Responsibility Report) is published and available at the company's website.

<https://americanstateswatercompany.gcs-web.com/static-files/9cf112f5-2d5c-4d2a-a889-8948ba4150c5>.

The company publishes the ESG report every other year and have also published Addendums in between the full ESG reports when needed. There is currently an Addendum to this report under the same ESG section on the website. We will publish another full ESG report in 2024 for 2022-2023. A copy of the 2020-2021 ESG report and its Addendum are attached as PDFs "**SRA-001 Q.3 ESG Report 2020-21**" and "**SRA-001 Q.3 ESG Report 2020-21 Addendum**".

**Question 4:**

Referring to A.20-07-012, GSWC's past response to Cal Advocates' Data Request, JMI-014, Attachment JMI-014, GSWC indicated that it has implemented an informal complaint process for calls that distributes and tracks all informal complaints received and processed as cases in their Customer Care and Building (CC&B). GSWC further stated that those complaints are stored in a monitoring log. Please explain the procedures followed using

this system to investigate complaints such as water quality, billing, rates, policy and practice, service, etc.

**Response 4:**

Response is pending

**Question 5:**

The scheduled appointment rate for GSWC in 2018 was 7.51%. Please provide updated data for the scheduled appointment rate for years 2019, 2020, 2021, 2022 and 2023.

**Response 5:**

Response is pending

**Question 6:**

Provide GSWC's policy manual detailing the system of how the high bill and leak adjustment request resolution is investigated and mitigated.

**Response 6:**

Response is pending

**Question 7:**

Please explain how GSWC calculates that customer calls have been answered within 30 seconds (during normal business hours) after requesting to speak with a Customer Service Representative ("CSR"). Provide a sample calculation with all supporting data.

- a. Explain whether GSWC was able to answer customer calls within 30 seconds for the years 2019,2020,2021,2022, and 2023. Provide all supporting data.

**Response 7:**

Response is pending

**Question 8:**

Please provide a copy of a sample customer bill for years 2020,2021,2022, and 2023.

**Response 8:**

Response is pending

**Question 9:**

Please provide a sample copy of a customer bill showing imposition of the drought surcharge from 2020,2021,2022, and 2023.

**Response 9:**

Response is pending

**Question 10:**

The CPUC Consumer Affairs Branch's ("CAB") customer complaints, show a customer in Zip code: 90746, City: Carson with Case Number: 50487, who submitted an informal complaint on 1/17/2020 detailing a high bill received. Please provide the 2020 bill receipts of the customer from January 2020 to December 2021.

**Response 10:**

Response is pending

**Question 11:**

The CPUC Consumer Affairs Branch's ("CAB") customer complaints show a customer in Zip code: 95670, City: Rancho Cordova, and Case number :516437, who submitted a complaint concerning a high bill of \$648 for June 2020. Please provide a copy of the customer's bill from January 2020 to December 2020.

**Response 11:**

Response is pending

**Question 12:**

As a requirement of America's Water Infrastructure Act ("AWIA") community water systems must submit a Risk and Resilience Assessment Certification to the United States Environmental Protection Agency ("EPA").

- a. Provide a copy of the most recent Risk and Resilience Assessment Certification that GSWC has submitted to the EPA for each water system.

**Response 12:**

The Risk and Resiliency Assessment Certification was completed online via an EPA portal, and an email from EPA was received verifying receipt of certification. See folder titled "SRA-001 Q.12 RRA Certifications".

**Question 13:**

Please provide searchable PDF copies of Golden State Water Company's Emergency Response Plans for each water system.

**Response 13:**

GSWC has one plan for all our systems. Please refer to searchable PDF “SRA-001 Q.13 Emergency Response Plan”.

The plan is available to all employees and can be shared with outside agencies. However, since the appendices contain confidential employee and business information, the appendices are confidential and for internal use only.

**END OF RESPONSE**



September 5, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-001 (A.23-08-010) – Partial Response 2  
Due Date: August 30, 2023      Extension Due Date: September 5, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

On April 30th, 2020, GSWC submitted the report, Measures to Improve Customer Service from January to December 2019. In the past, GSWC provided similar reports for the years 2015 to 2019. Has GSWC created any similar reports for any of the years 2020, 2021, 2022, or 2023? If so, please provide all reports for these years. If GSWC did not create additional reports, please confirm.

**Response 1:**

[Response submitted August 30, 2023](#)

**Question 2:**

The CPUC has created the Environmental and Social Justice (ESJ) Action Plan to serve as a commitment to furthering ESJ principles. Has GSWC created any measures for environmental social justice to date? If so please provide the details. If GSWC has not created any measures, please confirm.

**Response 2:**

[Response submitted August 30, 2023](#)

**Question 3:**

GSWC published a Corporate Social Responsibility Report in 2019 as advertised on the American States Water website. Did GSWC publish any Corporate Social Responsibility Report for the years 2020,2021,2022, or 2023? If so please provide all reports for these years. If GSWC did not create these additional reports, please confirm.

**Response 3:**

Response submitted August 30, 2023

**Question 4:**

Referring to A.20-07-012, GSWC's past response to Cal Advocates' Data Request, JMI-014, Attachment JMI-014, GSWC indicated that it has implemented an informal complaint process for calls that distributes and tracks all informal complaints received and processed as cases in their Customer Care and Building (CC&B). GSWC further stated that those complaints are stored in a monitoring log. Please explain the procedures followed using this system to investigate complaints such as water quality, billing, rates, policy and practice, service, etc.

**Response 4:**

GSWC follows a similar system to investigate complaints. For complaints such as water quality and high bills, GSWC tracks these complaints received and process as cases in our Customer Care and Billing (CC&B). GSWC will make every effort to resolve a customer complaint or inquiry at the initial contact. If a resolution cannot be reached in the first contact, the CSR will schedule an investigation.

Investigations are generally conducted with the customer present as often as possible. If contact is made, the Water Distribution Operator will conduct a field investigation by documenting their investigation. If no contact is made, the Water Distribution Operator will leave a door-tag stating the current read, results of investigation, date, time and contact information. After the field investigation is returned completed, the CSA Superintendent is notified and will review investigation results and make a final decision and designate within the case as a "Complaint" or "Inquiry".

For concerns regarding rates, or policy, GSWC will provide the customer with applicable Rules and Tariffs.

**Question 5:**

The scheduled appointment rate for GSWC in 2018 was 7.51%. Please provide updated data for the scheduled appointment rate for years 2019, 2020, 2021, 2022 and 2023.

**Response 5:**

Year	Schedule Appointment Rate
2019	1.05
2020	2.68
2021	3.8
2022	4.53
2023	5.56

**Question 6:**

Provide GSWC’s policy manual detailing the system of how the high bill and leak adjustment request resolution is investigated and mitigated.

**Response 6:**

GSWC will make every effort to resolve a customer’s high bill complaint or inquiry at the initial contact. A customer service representative (CSR) will gather information about the account and the billing issue, which includes reviewing consumption history, billing history, meter readings, and payment records. If a resolution cannot be reached in the first contact, the CSR will schedule an investigation. GSWC tracks high bill complaints received and processes as cases in our Customer Care and Billing (CC&B). Investigations are generally conducted with the customer present as often as possible. If contact is made, the Water Distribution Operator will conduct a field investigation by documenting their investigation. If no contact is made, the Water Distribution Operator will leave a door-tag stating the current read, results of investigation, date, time and contact information.

After the field investigation is returned completed, the CSR will review investigation results for a customer follow up. If the investigation verifies the meter was misread, a request will be forwarded to billing group to issue a corrected bill. Once new bill is corrected, call customer back with the final high bill inquiry resolution and outcome. Follow up calls will be made when a customer was not present or when the investigation indicates that the customer was not satisfied with the results. After discussing the results with the customer, a Customer Service Supervisor may approve a second high bill investigation (when the customer was not present for a high bill investigation), may request usage data logs (if available) or request a meter test to be conducted. After all investigations are returned completed, the Customer Service Supervisor is notified and will review investigation results and make a final decision and designate within the case as a “Complaint” or “Inquiry”.

During the investigation if it is determined that the high bill was due to a customer leak, a leak adjustment may be offered.

When a GSWC customer experiences a water leak and believes they meet the eligibility criteria for a leak adjustment, they must make a written request. In their request,



customers must explain the cause of the leak, where it occurred, and provide all relevant details.

Proof of Repair: Customers are required to submit sufficient proof that the leak has been repaired within a reasonable amount of time. This proof may include:

- Repair invoice or payment receipt that includes the address, date, and nature of the work if the repair was done by a contractor.
- If the customer performed the repair themselves, they must provide a brief written explanation of the repairs performed and copies of invoices or receipts for repair parts.

GSWC may require field verification to confirm that the leak repair has been completed before considering a leak adjustment. The leak adjustment request will be reviewed and authorized by the Golden State Water Company's Customer Service Supervisor. Only one billing cycle demonstrating unusual usage due to a leak will be eligible for an adjustment.

Submissions with incomplete information or missing documentation will be denied. GSWC will compare the customer's prior seasonal water usage to the water usage during the leak period to calculate the water loss to determine the adjustment amount. All customers requesting a billing adjustment are required to pay their bill in full or make payment arrangements while their adjustment request is being processed. The maximum adjustment will not exceed 50% of the water loss. A CSR will contact the customer once a decision is made, if the adjustment is granted and it will appear on the customer's next water bill.

**Question 7:**

Please explain how GSWC calculates that customer calls have been answered within 30 seconds (during normal business hours) after requesting to speak with a Customer Service Representative ("CSR"). Provide a sample calculation with all supporting data.

- a. Explain whether GSWC was able to answer customer calls within 30 seconds for the years 2019,2020,2021,2022, and 2023. Provide all supporting data.

**Response 7:**

The formula below has been configured in the CSC call management system to track the percentage of calls that are answered within 30 seconds.

Calculation name	Calculation	Description
ART (Actual Relative to Target)	$(100 * \text{TARGETACDCALLS} / \text{CALLSOFFERED}) - \text{TARGETPERCENT}$	This calculation determines the actual service level as compared to the target service level percentage.

**Response 7.a.:**

- 2019 – 75.25%: The average staff shrinkage was -18.50% in unplanned absences and staff turnover.
- 2020 – 82.59%
- 2021 – 87.24%
- 2022 – 61.21%: There were 35,000 more calls in Q3 & Q4 2022 vs. Q3 & Q4 2021, due to the resumption of disconnections for non-payment. The average staff shrinkage was -30%, due to sick/FMLA leave use and staff turnover.
- 2023 – 54.22%: YTD calls are 9% (+14,752) higher compared to the same period in 2022. The YTD average staff shrinkage is -32%, due to sick/FMLA leave use and staff turnover.

**Question 8:**

Please provide a copy of a sample customer bill for years 2020,2021,2022, and 2023.

**Response 8:**

Please refer to PDF file “SRA-001 Q.8 2020-23 Customer Bills”.

**Question 9:**

Please provide a sample copy of a customer bill showing imposition of the drought surcharge from 2020,2021,2022, and 2023.

**Response 9:**

Please refer to PDF file “SRA-001 Q.9 2020-23 Customer Bills”.

**Question 10:**

The CPUC Consumer Affairs Branch’s (“CAB”) customer complaints,show a customer in Zip code: 90746, City: Carson with Case Number: 50487, who submitted an informal complaint on 1/17/2020 detailing a high bill received. Please provide the 2020 bill receipts of the customer from January 2020 to December 2021.

**Response 10:**

On August 30, Cal Advocates confirmed the term “bill receipts” is in reference to a customer bill; and that this request should be for 12 months, starting January 2020 to December 2020. Please refer to PDF file “SRA-001 Q.10 Jan to Dec 2020”.

**Question 11:**

The CPUC Consumer Affair Branch's ("CAB") customer complaints show a customer in Zip code: 95670, City: Rancho Cordova, and Case number :516437, who submitted a complaint concerning a high bill of \$648 for June 2020. Please provide a copy of the customer's bill from January 2020 to December 2020.

**Response 11:**

[Please refer to PDF file "SRA-001 Q.11 Jan to Dec 2020"](#).

**Question 12:**

As a requirement of America's Water Infrastructure Act ("AWIA") community water systems must submit a Risk and Resilience Assessment Certification to the United States Environmental Protection Agency ("EPA").

- a. Provide a copy of the most recent Risk and Resilience Assessment Certification that GSWC has submitted to the EPA for each water system.

**Response 12:**

[Response submitted August 30, 2023](#)

**Question 13:**

Please provide searchable PDF copies of Golden State Water Company's Emergency Response Plans for each water system.

**Response 13:**

[Response submitted August 30, 2023](#)

**END OF RESPONSE**



October 23, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-004 (A.23-08-010)  
Due Date: October 20, 2023      Extension Due Date: October 23, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

**Telephone Performance Standards:**

Please provide the following annual data for all CSAs in a tabulated Excel spreadsheet format for years 2019-2023.

- a. Total number of customer phone contacts requesting to speak with a customer service representative (CSR) during normal business hours.
- b. Number of calls reaching a utility representative within 30 seconds.
- c. Number of calls attempting to reach a utility representative.
- d. Number of calls taking more than 30 seconds to reach a utility representative during normal business hours.
- e. In the case where calls were answered in more than 30 seconds which does not meet GO-103 A, Appendix E 1. (A), please provide the reason(s) as to why Golden State did not meet GO-103 A standards.
- f. Number of calls abandoned before reaching a CSR during normal business hours.

**Response 1:**

<b>Telephone Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Total number of customer phone contacts requesting to speak with a customer service representative (CSR) during normal business hours. (Total Answered Calls)	317,607	292,037	227,025	236,518	179,590
b. Number of calls reaching a utility representative within 30 seconds.	239,002	241,204	198,067	144,760	96,521
c. Number of calls attempting to reach a utility representative (Total Calls Received)	329,294	302,353	231,813	249,579	192,712
d. Number of calls taking more than 30 seconds to reach a utility representative (CSR) during normal business hours.	90,292	61,149	104,819	104,819	96,191
e. In the case where calls were answered in more than 30 seconds which does not meet GO-103 A, Appendix E 1. (A), please provide the reason(s) as to why Golden State did not meet GO-103 A standards.	See Q.1.e 2019	N/A	N/A	See Q.1.e 2022	See Q.1.e 2023
f. Number of calls abandoned before reaching a CSR during normal business hours	11,686	10,316	4,788	13,452	13,122

**Response to Q.1.e. by Year**

**Q.1.e. 2019** -Phone coverage was not sufficient from July to December, with staff shrinkage as high as -29% in Q4.

**Q.1.e. 2022** - There were 35,000 more calls received in Q3 & Q4 2022 vs. Q3 &Q4 2021, due to resumption of disconnections for non-payment. Average call handling time increased from 3.5 minutes to 5 minutes. The average staff shrinkage was -30%, due to increase in sick leave/dependent care use and staffing turnover.

**Q.1.e. 2023** - Call volume is trending same or slightly higher than 2022. Average call handling time remains at 5 minutes. The average staff shrinkage remains at -30%, due to increase in sick leave/dependent care use and staffing turnover.

**Question 2:**

**Billing Performance Standards:**

Please provide the following annual data for all CSAs for years 2019-2023.

- a. Number of bills rendered within seven calendar days of the scheduled billing date.
- b. Number of bills scheduled to be rendered annually.

- c. Number of bills not rendered within seven business days of the scheduled billing date. Excluding accounts activated 10 calendar days prior to the normal billing cycle. Also excluding accounts that are scheduled to receive a final bill within 10 calendar days after the normal billing cycle
- d. Number of bills rendered inaccurately annually, excluding bills found to be inaccurate strictly as a result of estimations. Also excluding bills where the inaccuracy does not affect the calculation of the bill, or where the fault does not lie with the utility.
- e. Number of bills found inaccurate after being sent to customers, brought to a utilities attention either as a result of customer complaints and/or by the utilities own efforts.
- f. Total number of payments posted.
- g. Number of payment posting errors annually by CSA.
- h. Number of payments posted incorrectly due to the utilities error.

**Response 2:**

<b>Billing Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Number of bills rendered within seven calendar days of the scheduled billing date.	2,542,966	2,555,674	2,574,214	2,664,974	2,302,612
b. Number of bills scheduled to be rendered annually.	2,543,123	2,556,661	2,574,458	2,665,959	2,303,105
c. Number of bills not rendered within seven business days of the scheduled billing date. Excluding accounts activated 10 calendar days prior to the normal billing cycle. Also excluding accounts that are scheduled to receive a final bill within 10 calendar days after the normal billing cycle	157	987	244	985	493
d. Number of bills rendered inaccurately annually, excluding bills found to be inaccurate strictly as a result of estimations. Also excluding bills where the inaccuracy does not affect the calculation of the bill, or where the fault does not lie with the utility.	7,959	8,077	4,482	10,438	5,155
e. Number of bills found inaccurate after being sent to customers, brought to a utilities attention either as a result of customer complaints and/or by the utilities own efforts.	228	235	295	172	194
f. Total number of payments posted.	2,352,401	2,215,694	2,228,362	2,252,474	1,922,486
g. Number of payment posting errors annually by CSA.	1,386	N/A	N/A	N/A	N/A
h. Number of payments posted incorrectly due to the utilities error.	733	547	493	185	1,881

**Question 3:****Meter Reading Performance Standard:**

Please provide the following annual data for all CSA's for years 2019- 2023.

- a. The total number of meter readings scheduled.
- b. The number of meters not read.

**Response 3:**

<b>Meter Reading Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. The total number of meter readings scheduled.	2,543,123	2,556,661	2,574,458	2,665,959	2,303,105
b. The number of meters not read.	11,132	15,485	11,922	48,475	20,219

**Question 4:****Work Completion Performance Standards:**

Please provide the following annual data of all CSA regions for years 2019-2023.

- a. Number of scheduled appointments missed.
- b. Number of scheduled appointments.
- c. Number of customer requested work not completed on or before the scheduled date.
- d. Number of jobs resulting from customer requests for meter turn ons, meter read-over, disconnects and reconnects.
- e. Number of jobs resulting from customer requests for meter turn ons, meter read-over, disconnects and reconnects not completed on or before the scheduled date.
- f. Number of customer orders not completed on or before the scheduled data.  
Excluding any orders not completed due to events outside the utility's control.

**Response 4:**

<b>Work Completion Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Number of scheduled appointments missed.	21	48	73	60	55
b. Number of scheduled appointments.	2,000	1,792	1,919	1,325	1,044
c. Number of customer requested work not completed on or before the scheduled date.	614	247	138	425	248
d. Number of jobs resulting from customer requests for meter turn ons, meter read-over, disconnects and reconnects.	41,792	20,171	17,202	28,168	22,660
e. Number of jobs resulting from customer requests for meter turn ons, meter read-over, disconnects and reconnects not completed on or before the scheduled date.	614	247	138	425	248

f. Number of customer orders not completed on or before the scheduled date. Excluding any orders not completed due to events outside the utility's control.	See e. Not tracked	See e. Not tracked	See e. Not tracked	See e. Not tracked	See e. Not tracked
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**Question 5:**

**Response to Customer and Regulatory Complaints Performance Standard:**

Refer to MDR H.1 No of Complaints 2018 to 2022.pdf. Please provide the following data in a tabulated excel format for the years 2019-2023.

- a. For CSA Santa Maria Coastal District, the number of customer complaints - bill inquiry in the Santa Maria CSA increased from 57 to 78 from 2020 to 2021. Please provide the reason for the increase and any supporting documents.
  - i. Please provide the measure(s) taken to reduce the number of bill complaints for such years and the plan for the current GRC cycle.
- b. For CSA Arden Cordova/Northern District, the number of customer complaints in the Arden Cordova/Northern District increased in 2019-2020 from 17 to 40 informal complaints. Please provide the reason for the increase and any supporting documentation.
  - i. Please provide the measures taken to reduce the number of customer complaints for such years and the plan for the GRC cycle.
- c. For CSA Southwest District, the number of customer complaints in the Southwest District increased in 2019 to 2021 from 58 formal complaints to 78. Please provide the reason for the increase and any supporting documentation.
  - i. Please provide the measures taken to reduce the number of customer complaints for such years and the plan for the GRC Cycle.

**Response 5:**

<b>Response to Customer and Regulatory Complaints Performance Standard</b>	<b>Response</b>
a. For CSA Santa Maria Coastal District, the number of customer complaints - bill inquiry in the Santa Maria CSA increased from 20 to 57 from 2020 to 2021. Please provide the reason for the increase and any supporting documents.	Cases of incorrect meter reads increased in 2021. The 57 cases represented 0.03% of total Santa Maria water bills issued in 2021.
i. Please provide the measure(s) taken to reduce the number of bill complaints for such years and the plan for the current GRC cycle.	Bill related complaints were reduced by 86%, to a total of 8 in 2022. GSWC will continue to train field staff, stressing the importance of timeliness and accuracy in meter reading on an ongoing basis.



<p>b. For CSA Arden Cordova/Northern District, the number of customer complaints in the Arden Cordova/Northern District increased in 2019-2020 from 17 to 40 customer complaints. Please provide the reason for the increase and any supporting documentation.</p>	<p>Cases of incorrect meter reads increased in 2020. The 40 cases represented 0.04% of total Arden Cordova water bills issued in 2020.</p>
<p>i. Please provide the measures taken to reduce the number of customer complaints for such years and the plan for the GRC cycle.</p>	<p>Bill related complaints were reduced by &gt;72%, to a total of 11 in 2021, and a total of 9 in 2022. GSWC will continue to train field staff, stressing the importance of timeliness and accuracy in meter reading on an ongoing basis.</p>
<p>c. For CSA Southwest District, the number of customer complaints in the Southwest District increased in 2020 to 2021 from 57 customer complaints to 78. Please provide the reason for the increase and any supporting documentation.</p>	<p>Cases of incorrect meter reads increased in 2021. The 78 cases represented 0.01% of total Southwest water bills issued in 2021.</p>
<p>i. Please provide the measures taken to reduce the number of customer complaints for such years and the plan for the GRC Cycle.</p>	<p>Bill related complaints were reduced by 54%, to a total of 36 in 2022. GSWC will continue to train field staff, stressing the importance of timeliness and accuracy in meter reading on an ongoing basis.</p>

**Question 6:**

**Service Interruption:**

Please provide the following annual data of all interruptions for each CSA region for the years 2019-2023.

- a. List of emergency interruptions when more than 10 service connections are interrupted.
- b. List of scheduled interruptions when more than 10 service connections are interrupted.

**Response 6:**

Refer to Excel file "SRA-004 Q.6 Service Interruptions".

**END OF RESPONSE**



December 5, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
 505 Van Ness Avenue  
 San Francisco, CA 94102

Subject: Data Request SRA-005 (A.23-08-010)  
 Customer Service Performance Measure Partial Response No. 1  
 Due Date (Extended): December 5, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

**Final Read & Final Bill:**

- a. Please provide the amount of bills not provided within 14 calendar days of the meter read from years 2019-2023.
- b. Please provide the explanation for such bills not provided within 14 calendar days of the meter read from years 2019-2023.

**Response 1:**

<b>Final Read &amp; Final Bill</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Amount of bills not provided within 14 calendar days of the meter read from years 2019-2023.	0	22	16	18	19
b. Explanation for such bills not provided within 14 calendar days of the meter read from years 2019-2023.	The delay is caused by our inability to access the meter and or obtain the final meter read after the previous bill was already estimated. This has occurred in 0% to 0.11% of final bills over the past 5 years.				

**Question 2:**

**Bill Accuracy Performance Measure:** Please provide the following data in an excel tabulated spreadsheet

- a. The number of bills rendered within seven calendar days of the scheduled billing date from years 2019-2023.
- b. Total number of bills scheduled to be rendered for years 2019-2023.

**Response 2:**

2023 data is year to date data as of September 30, 2023.

<b>Billing Accuracy Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Number of bills rendered within seven calendar days of the scheduled billing date.	2,542,966	2,555,674	2,574,214	2,664,974	2,302,612
b. Number of bills scheduled to be rendered annually.	2,543,123	2,556,661	2,574,458	2,665,959	2,303,105

**Question 3:**

**Customer Requested Work Completion Performance Measure:**

- a. Please provide the number of customer orders not completed on or before the scheduled date for years 2019-2023.
- b. Please provide the total number of customer orders not scheduled and completed in the reporting month for years 2019-2023.

**Response 3:**

2023 data is year to date data as of September 30, 2023.

<b>Customer Requested Work Completion Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Number of customer requested work not completed on or before the scheduled date.	614	247	138	425	248
b. Number of customer orders not scheduled and completed in the reporting months.	0	0	0	0	0

**Question 4:**

**Service Interruption:** Refer to SRA-004 Q.6 Service Interruption Response. For the following questions, also provide explanations for service interruptions including date and time of service interruption, date and time service was restored, equipment that operated or failed, cause of interruption, actions required to restore service, and steps taken to prevent future recurrences.

- a. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin East CSA for years 2019 - 2022.
- b. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin West CSA for years 2019, 2022, and 2023.

- c. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Arden Cordova CSA for years 2020-2022.
- d. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Culver City CSA for years 2020, 2021, 2022, and 2023.
- e. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Southwest CSA for years 2019, 2020, 2021, 2022, and 2023.
- f. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the San Gabriel Valley CSA for years 2020, 2021, and 2023.
- g. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Los Alamitos CSA for years 2019- 2023.
- h. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Placentia CSA for years 2019- 2023.
- i. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Barstow CSA for 2019.

**Response 4:**

In an email received on November 27, Cal Advocates agreed to limit the scope of this question to the Culver City, Southwest, Los Alamitos and Placentia CSAs. Response will be provided by December 8th.

**Question 5:**

**Arden Expenses: Please refer to SRA-003 Question 1A Response viewing excel sheet titled SRA003-AC Maintenance, Sheet 1.**

- a. Please provide the justification for the amount of \$4,000 in cell Q4. How did GSWC estimate \$4,000 for additional expenses.
- b. Please provide the justification for the amount of \$5,076 in cell Q5. How did GSWC estimate \$5,076 for additional expenses.
- c. Please provide the justification for the amount of \$9,630 in cell Q6. How did GSWC estimate \$9,630 for additional expenses.

**Response 5:**

- a. The additional expense of \$4,000 is based on the estimate of an additional 2 meter tests annually.
- b. The additional expense of \$5,076 is based on the estimate of additional booster pump maintenance. Without historical operational data related to the Robbins system, GSWC is not able to determine exactly how much reconditioning will be required.
- c. The additional expense of \$9,630 is based on the estimate of an additional 2 leak detection surveys annually.

**Question 6:**

**Customer Complaints**

- a. Please provide GSWC's total company-wide customer count for 2023.

b. Please provide the number of complaints reported annually to CAB for 2019.

**Response 6:**

- a. As of October 31, 2023, GSWC has 263,998 active customers.
- b. 29

**Question 7:**

**Call Answer Performance Measure:**

- a. Please provide an explanation why GSWC's Call Answer Performance Measure is below 60% for years 2022 and 2023.

**Response 7:**

- 2022 - There were 35,000 more calls received in Q3 & Q4 2022 vs. Q3 & Q4 2021, due to resumption of disconnections for non-payment. Average call handling time increased from 3.5 minutes to 5 minutes. Phone coverage was not sufficient with an average staff shrinkage of -30%, due to increase in sick leave/dependent care use and staffing turnover.
- 2023 - Call volume is trending the same or slightly higher than 2022. Average call handling time remains at 5 minutes. Phone coverage was not sufficient with the average staff shrinkage still at -30%, due to increase in sick leave/dependent care use and staffing turnover.

**END OF RESPONSE**



December 11, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-005 (A.23-08-010)  
Customer Service Performance Measure Partial Response Final  
Due Date: December 8, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

**Final Read & Final Bill:**

- a. Please provide the amount of bills not provided within 14 calendar days of the meter read from years 2019-2023.
- b. Please provide the explanation for such bills not provided within 14 calendar days of the meter read from years 2019-2023.

**Response 1:**

[Response provided on December 5th, 2023.](#)

**Question 2:**

**Bill Accuracy Performance Measure:** Please provide the following data in an excel tabulated spreadsheet

- a. The number of bills rendered within seven calendar days of the scheduled billing date from years 2019-2023.
- b. Total number of bills scheduled to be rendered for years 2019-2023.

**Response 2:**

[Response provided on December 5th, 2023.](#)

**Question 3:****Customer Requested Work Completion Performance Measure:**

- a. Please provide the number of customer orders not completed on or before the scheduled date for years 2019-2023.
- b. Please provide the total number of customer orders not scheduled and completed in the reporting month for years 2019-2023.

**Response 3:**

[Response provided on December 5th, 2023.](#)

**Question 4:**

**Service Interruption:** Refer to SRA-004 Q.6 Service Interruption Response. For the following questions, also provide explanations for service interruptions including date and time of service interruption, date and time service was restored, equipment that operated or failed, cause of interruption, actions required to restore service, and steps taken to prevent future recurrences.

- a. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin East CSA for years 2019 - 2022.
- b. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin West CSA for years 2019, 2022, and 2023.
- c. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Arden Cordova CSA for years 2020-2022.
- d. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Culver City CSA for years 2020, 2021, 2022, and 2023.
- e. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Southwest CSA for years 2019, 2020, 2021, 2022, and 2023.
- f. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the San Gabriel Valley CSA for years 2020, 2021, and 2023.
- g. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Los Alamitos CSA for years 2019- 2023.
- h. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Placentia CSA for years 2019- 2023.
- i. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Barstow CSA for 2019.

**Response 4:**

- d. See file ["SRA-005 – Response 4 – Culver City Service Interruption Data"](#) for details.
- e. See file ["SRA-005 – Response 4 – Southwest Service Interruption Data"](#) for details.
- g. See file ["SRA-005 – Response 4 – Los Alamitos Service Interruption Data"](#) for details.
- h. See file ["SRA-005 – Response 4 – Placentia Service Interruption Data"](#) for details.

In an email received on November 27, Cal Advocates agreed to limit the scope of this question to the Culver City, Southwest, Los Alamitos and Placentia CSAs.

GSWC has included a corrected version to SRA-004 Question 6. Please see attachment "SRA-004 Q.6 Service Interruptions-Corrected".

**Question 5:**

**Arden Expenses: Please refer to SRA-003 Question 1A Response viewing excel sheet titled SRA003-AC Maintenance, Sheet 1.**

- a. Please provide the justification for the amount of \$4,000 in cell Q4. How did GSWC estimate \$4,000 for additional expenses.
- b. Please provide the justification for the amount of \$5,076 in cell Q5. How did GSWC estimate \$5,076 for additional expenses.
- c. Please provide the justification for the amount of \$9,630 in cell Q6. How did GSWC estimate \$9,630 for additional expenses.

**Response 5:**

Response provided on December 5th, 2023.

**Question 6:**

**Customer Complaints**

- a. Please provide GSWC's total company-wide customer count for 2023.
- b. Please provide the number of complaints reported annually to CAB for 2019.

**Response 6:**

Response provided on December 5th, 2023.

**Question 7:**

**Call Answer Performance Measure:**

- a. Please provide an explanation why GSWC's Call Answer Performance Measure is below 60% for years 2022 and 2023.

**Response 7:**

Response provided on December 5th, 2023.

**END OF RESPONSE**





December 5, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
 505 Van Ness Avenue  
 San Francisco, CA 94102

Subject: Data Request SRA-005 (A.23-08-010)  
 Customer Service Performance Measure Partial Response No. 1  
 Due Date (Extended): December 5, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

**Final Read & Final Bill:**

- a. Please provide the amount of bills not provided within 14 calendar days of the meter read from years 2019-2023.
- b. Please provide the explanation for such bills not provided within 14 calendar days of the meter read from years 2019-2023.

**Response 1:**

<b>Final Read &amp; Final Bill</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Amount of bills not provided within 14 calendar days of the meter read from years 2019-2023.	0	22	16	18	19
b. Explanation for such bills not provided within 14 calendar days of the meter read from years 2019-2023.	The delay is caused by our inability to access the meter and or obtain the final meter read after the previous bill was already estimated. This has occurred in 0% to 0.11% of final bills over the past 5 years.				

**Question 2:**

**Bill Accuracy Performance Measure:** Please provide the following data in an excel tabulated spreadsheet

- a. The number of bills rendered within seven calendar days of the scheduled billing date from years 2019-2023.
- b. Total number of bills scheduled to be rendered for years 2019-2023.

**Response 2:**

2023 data is year to date data as of September 30, 2023.

<b>Billing Accuracy Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Number of bills rendered within seven calendar days of the scheduled billing date.	2,542,966	2,555,674	2,574,214	2,664,974	2,302,612
b. Number of bills scheduled to be rendered annually.	2,543,123	2,556,661	2,574,458	2,665,959	2,303,105

**Question 3:**

**Customer Requested Work Completion Performance Measure:**

- a. Please provide the number of customer orders not completed on or before the scheduled date for years 2019-2023.
- b. Please provide the total number of customer orders not scheduled and completed in the reporting month for years 2019-2023.

**Response 3:**

2023 data is year to date data as of September 30, 2023.

<b>Customer Requested Work Completion Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Number of customer requested work not completed on or before the scheduled date.	614	247	138	425	248
b. Number of customer orders not scheduled and completed in the reporting months.	0	0	0	0	0

**Question 4:**

**Service Interruption:** Refer to SRA-004 Q.6 Service Interruption Response. For the following questions, also provide explanations for service interruptions including date and time of service interruption, date and time service was restored, equipment that operated or failed, cause of interruption, actions required to restore service, and steps taken to prevent future recurrences.

- a. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin East CSA for years 2019 - 2022.
- b. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin West CSA for years 2019, 2022, and 2023.

- c. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Arden Cordova CSA for years 2020-2022.
- d. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Culver City CSA for years 2020, 2021, 2022, and 2023.
- e. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Southwest CSA for years 2019, 2020, 2021, 2022, and 2023.
- f. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the San Gabriel Valley CSA for years 2020, 2021, and 2023.
- g. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Los Alamitos CSA for years 2019- 2023.
- h. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Placentia CSA for years 2019- 2023.
- i. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Barstow CSA for 2019.

**Response 4:**

In an email received on November 27, Cal Advocates agreed to limit the scope of this question to the Culver City, Southwest, Los Alamitos and Placentia CSAs. Response will be provided by December 8th.

**Question 5:**

**Arden Expenses: Please refer to SRA-003 Question 1A Response viewing excel sheet titled SRA003-AC Maintenance, Sheet 1.**

- a. Please provide the justification for the amount of \$4,000 in cell Q4. How did GSWC estimate \$4,000 for additional expenses.
- b. Please provide the justification for the amount of \$5,076 in cell Q5. How did GSWC estimate \$5,076 for additional expenses.
- c. Please provide the justification for the amount of \$9,630 in cell Q6. How did GSWC estimate \$9,630 for additional expenses.

**Response 5:**

- a. The additional expense of \$4,000 is based on the estimate of an additional 2 meter tests annually.
- b. The additional expense of \$5,076 is based on the estimate of additional booster pump maintenance. Without historical operational data related to the Robbins system, GSWC is not able to determine exactly how much reconditioning will be required.
- c. The additional expense of \$9,630 is based on the estimate of an additional 2 leak detection surveys annually.

**Question 6:**

**Customer Complaints**

- a. Please provide GSWC's total company-wide customer count for 2023.

b. Please provide the number of complaints reported annually to CAB for 2019.

**Response 6:**

- a. As of October 31, 2023, GSWC has 263,998 active customers.
- b. 29

**Question 7:**

**Call Answer Performance Measure:**

- a. Please provide an explanation why GSWC's Call Answer Performance Measure is below 60% for years 2022 and 2023.

**Response 7:**

- 2022 - There were 35,000 more calls received in Q3 & Q4 2022 vs. Q3 & Q4 2021, due to resumption of disconnections for non-payment. Average call handling time increased from 3.5 minutes to 5 minutes. Phone coverage was not sufficient with an average staff shrinkage of -30%, due to increase in sick leave/dependent care use and staffing turnover.
- 2023 - Call volume is trending the same or slightly higher than 2022. Average call handling time remains at 5 minutes. Phone coverage was not sufficient with the average staff shrinkage still at -30%, due to increase in sick leave/dependent care use and staffing turnover.

**END OF RESPONSE**



CONSUMER AFFAIRS BRANCH

# CAB Data Request Form

Please provide the information about your CAB data request. Once your data request has been received, staff will be able to provide you a data table that reflects your stated needs.

**! Download this form before filling out**

### A. Contact Information

1. Date submitted to CAB: 12/6/2023

2. Deadline Request Date: 12/12/2023

CAB requires a minimum of 5 business days to complete most data requests.  
Expedited requests will be considered by CAB management on an individual case basis.

3. Your Contact Information: Name: Ama Serwaa  
Division/Branch: ORA Phone: 213-266-4757 Email: Ama.Serwaa@cpuc.gov

### B. Background Information

4. The data will be used to: Calculate customer service metrics & complaints for Golden State Water Company year 2019.

Understanding the purpose of your request will help guide CAB in preparing the data response.  
Example: *We are considering an OIR and need to find out the number of cramming complaints on a monthly basis from November 2009 to April 2010.*

5. Audience: Internal PUC Audience: Public Advocates Office - Water Branch  
External PUC Audience:

Identifying the end-user audience will help guide CAB in preparing the data response

6. Identify data variables to be included: Name of Utility/Entity:  
Subject Matter:

Example: *Customers shut-offs in SoCal Edison territory or complaints about quality of service against all telco companies.*

7. Specific industry, if applicable:  Telecommunications  Energy  Water  
 Other/non-regulated:

8. CPCN Number: aka/dba:  
"Certificate of Public Convenience and Necessity" identifying code or other information about the Utility/Entity (if known)

9. Time Period: Start date: January 2019 End date: December 2019  
Provide a specific time period of the data you need. Example: *Feb 1, 2009 to June 30, 2009.*

10. Case Type:<sup>1</sup>  Informal Complaint  Complaint  LifeLine  Inquiry  Phone Contacts  
 All Contacts ( Include misdirected contacts)

Please identify the case type that you want to include in your data request by checking the appropriate box(es) at the right. The following definitions will assist you in determining which case types will meet your needs:

**Informal Complaint (IC):** Is a written consumer contact expressing dissatisfaction or dispute with an action that is regulated by the CPUC and involves interaction with the utility as part of the resolution process.

**Complaint:** Is a written consumer contact expressing dissatisfaction with a practice of the CPUC or with a regulated or non-regulated utility. These contacts do not involve interaction with utilities as part of the resolution process.

**LifeLine:** Consumer contacts (ICs, complaints, phone) regarding the LifeLine program which provides a subsidy for telecommunications service. LifeLine billing contacts are handled the same way as general billing contacts (ICs). LifeLine appeals are consumers contesting the denial of their applications to the LifeLine program.

**Inquiry:** Is a written consumer contact requesting facts and information for a situation.

**Phone Contacts (non-LifeLine):** Consumer calls in reference to concerns, questions and complaints related to utility companies.

**All contacts** will not include misdirected contacts unless specifically requested.

**Misdirected consumer contacts** are those which are addressed to CAB but are obviously intended for a utility or an agency outside the CPUC.

11. Is Geographic information data required?  Yes  No

If you plan to perform a GIS analysis, you must specifically request geographical information to be included.

Please be aware that consumer contact data and other data held by CAB is subject to the rules and conditions outlined in General Order 66-C and Public Utilities Code Section 583, which apply to public records and the confidentiality of records. These provisions may impact the data request response provided to you.

Signature

**Submit Form**

Click this button to submit the request to [cabdatarequest@cpuc.ca.gov](mailto:cabdatarequest@cpuc.ca.gov).

<sup>1</sup> Case type definitions changed November 2013. CAB staff can advise you how the change impacts pre-November 2013 data.

**RESET FORM**

**Golden State Water Company  
Customer Service & Reporting Standards Calculations**

## CALL ANSWER PERFORMANCE MEASURES

Calculation: Number of Calls Reaching a utility representative w/n 30 sec. / number of attempts to reach a utility representative  
 Performance must be greater than or equal to 80% . For this performance measure " substantially out of compliance

<b>2019</b>	239,002	<b>2020</b>	241,204	<b>2021</b>	198,067
	329,294		302,353		231,813
<b>Total</b>	<b>73%</b>		<b>80%</b>		<b>85%</b>
	<b>FALSE</b>		<b>FALSE</b>	<b>???</b>	<b>TRUE</b>

## Abandoned Call Rate Performance Measure

Calculation: Number of Calls Abandoned / Number of attempts to reach a utility representative  
 Performance measure must be less than or equal to 5%

<b>2019</b>	11,686	<b>2020</b>	10,316	<b>2021</b>	4,788
	329,294		302,353		231,813
<b>Total</b>	<b>4%</b>		<b>3%</b>		<b>2%</b>
	<b>TRUE</b>		<b>TRUE</b>		<b>TRUE</b>



y representative  
iance is deemed to be less than 60%

<b>2022</b>	144,760	<b>2023</b>	96,521
	249,579		192,712
	<b>58%</b>		<b>50%</b>
	<b>FALSE</b>		<b>FALSE</b>

<b>2022</b>	13,452	<b>2023</b>	13,122
	249,579		192,712
	<b>5.39%</b>		<b>7%</b>
	<b>FALSE</b>		<b>FALSE</b>

### A. BILL RENDERING PERFORMANCE MEASURE

Calculation: Number of Bills not rendered within seven calendar days of the schddule billing date / total number  
Performance measure must be greater than or equal to 99%

<b>2019</b>	157	<b>2020</b>	987	<b>2021</b>
	2,543,123		2555674	
<b>Total</b>	<b>0.01%</b>		<b>0.04%</b>	
	<b>TRUE</b>		<b>TRUE</b>	

### B: BILL ACCURACY PERFORMANCE MEASURE

Calculation: Number of bills rendered inaccurately for the cycle / Total number of bills rendered for the billing c  
Performance measure must be less than or equal to 3%

<b>2019</b>	7959	<b>2020</b>	8077	<b>2021</b>
	2,543,123		2,556,661	
<b>Total</b>	<b>0.31%</b>		<b>0%</b>	
	<b>TRUE</b>		<b>TRUE</b>	

### C. PAYMENT POSTING ERROR PERFORMANCE MEASURE

Calculation: Number of payment posting errors / total number of payments posted  
Performance Measure must be less than or equal to 1.0%

<b>2019</b>	733	<b>2020</b>	547	<b>2021</b>
	2352401		2215694	
<b>TOTAL</b>	<b>0.03%</b>		<b>0.02%</b>	
	<b>TRUE</b>		<b>TRUE</b>	

r of bills scheduled to be rendered.

244	<b>2022</b>	985	2023	493
2,574,458		2,665,959		2303105.00
<b>0.01%</b>		<b>0.04%</b>		<b>0.02%</b>
<b>TRUE</b>		<b>TRUE</b>		<b>TRUE</b>

ycle

4482	<b>2022</b>	10438	<b>2023</b>	5155
2,574,458		2,665,959		2303105
<b>0%</b>		<b>0%</b>		<b>0%</b>
<b>TRUE</b>		<b>TRUE</b>		<b>TRUE</b>

493	<b>2022</b>	185	<b>2023</b>	1881
2228362		2252474		1922486
<b>0.02%</b>		<b>0.01%</b>		<b>0.10%</b>
<b>TRUE</b>		<b>TRUE</b>		<b>TRUE</b>

### METER READING PERFORMANCE STANDARD

Calculation: Number of Scheduled Meters not read / Number of meter readings scheduled  
Performance must be less than or equal to 3.0%

<b>2019</b>	11,132 2,543,123	<b>2020</b>	15,485 2,556,661	<b>2021</b>	11,922 2,574,458
<b>Total</b>	<b>0.44%</b> TRUE	<b>0.61%</b> TRUE	<b>0.46%</b> TRUE		

**2022** 48,475  
2,665,959

**1.82%**  
TRUE

**2023** 20,219  
2,303,105

**0.88%**  
TRUE

## A. SCHEDULED APPOINTMENT PERFORMANCE MEASURE

Calculation: Number of Scheduled Appointments Missed/Number of Scheduled Appointments  
Performance measure must be less than or equal to 5.0%

<b>2019</b>	21 2000	<b>2020</b>	48 1792	<b>2021</b>	73 1919
<b>TOTAL</b>	<b>1.05%</b> TRUE	<b>2.68%</b> TRUE	<b>3.80%</b> TRUE		

Please write the criterion you are using such as Less than/More Than/or Equal to X percentage. You have wri

## B. CUSTOMER REQUESTED WORK COMPLETION PERFORMANCE MEASURE

Calculation: Number of customer orders not completed on or before the scheduled data / total number of custo  
Performance Measure must be less than or equal to 5%

<b>2019</b>	614 41792	<b>2020</b>	247 20171	<b>2021</b>	138 17202
<b>Total</b>	<b>1.47%</b> TRUE	<b>1.22%</b> TRUE	<b>0.80%</b> TRUE		

<b>2022</b>	60	<b>2023</b>	55
	1325		1044
	<b>4.53%</b>		<b>5.27%</b>
	TRUE		FALSE

itten this for Meter Reading.

mer orders scheduled

<b>2022</b>	425	<b>2023</b>	248
	28168		22660
	1.51%		1.09%
	TRUE		TRUE

## RESPONSE TO CUSTOMER AND REGULATORY COMPLAINTS PERFORMANCE STANDARDS

Data is Informal Complaints which are reported from CAB to Utility

Calculation: Number of Complaints reported annually to the utility by the CAB/Total number of customers  
Performance Measure must be less than or equal to 0.1%

2019	29	2020	231	2021	161
	260,326		261,308		262,267
<b>TOTAL</b>	<b>0.01%</b>	<b>0.09%</b>	<b>0.06%</b>		
	TRUE	TRUE	TRUE		



## DARD

s

2022	221	2023	168
	263,101		263,998
	<b>0.08%</b>		<b>0.06%</b>
	TRUE		TRUE

Golden State Water Company - ALL  
 Minimum Data Request  
 Section A. Basic Information

Item No.	Explanation	Recorded			Last Authorized			Estimated				
		2018	2019	2020	2021	2022	2022	2023	2024	2025	2026	2027
1	Number of Customers Yearly Percent Increase	259,513 0.31%	260,328 0.31%	261,308 0.38%	262,287 0.37%	263,101 0.31%	259,951 0.29%	260,714 0.29%	261,480 0.29%	265,458 0.33%	266,336 0.33%	267,202 0.33%
2	Total Water Sales (CCF)	57,359,837	53,956,750	56,783,337	56,983,405	53,527,045	56,574,185	55,993,480	55,994,573	54,432,608	54,663,745	54,874,197
3	Revenue Requirement (\$000) Percent Increase over adopted						\$374,652.4 -10.14%	\$385,248.5	\$400,959.6	\$466,466.8 16.3%	\$488,793.4 4.8%	\$512,972.1 4.9%
4	Recorded Revenue (\$000) Percent Increase over adopted	\$291,364.0	\$313,018.5	\$324,717.9	\$340,654.1	\$336,649.9	See A.3 above for proposed & forecasted D.23-06-024 2020 GRC, AL 1906-W, 2024 Estimated -10.14%					
5	Revenue per Customer	\$1,122.7	\$1,202.4	\$1,242.7	\$1,298.8	\$1,279.5	\$1,441.2	\$1,477.7	\$1,533.4	\$1,757.2	\$1,835.3	\$1,919.8
6	GO Employees Yearly Percent Increase	232	231 -0.43%	253 9.52%	244 -3.56%	267 9.43%	280	280 0.00%	280 0.00%	334	334 0.00%	334 0.00%
7	District Employees Yearly Percent Increase	268	275 2.61%	263 -4.36%	246 -6.46%	225 -8.54%	296	296 0.00%	296 0.00%	261	261 0.00%	261 0.00%
8	Rate Changes	Recorded count does not include temps Reference Chapter 2 of Report on Results of Operations "Rate History", page 2-1, for each Rate-making Area										

Golden State Water Company - ALL  
Minimum Data Request  
Section B. Revenue Requirement: O&M, A&G, and GO  
For significant changes see Attachment B

Item No.	Explanation	2018	Recorded 2019	2020	2021	2022	2022	2022	Last Authorized 2023	2024	2025	Estimated 2026	2027
1	O&M Expenses (in thousands) Yearly Percent Increase Reference Percent Increase over adopted Amount Increase over the adopted expense Percent Increase of Adopted Year Gross Revenue O&M Expenses per Customer	\$133,114.5	\$117,463.5 -11.8%	\$118,235.0 0.7%	\$124,476.7 5.3%	\$134,941.2 8.4%	\$153,578.6	\$152,867.1 -0.5% D.23.06-024 AL 1899-W, 1901 Estimated -12.1% (18,637.3) -5.0%	\$154,086.8 0.8% Estimated -4.8%	\$178,546.6 1%	\$180,152.6 1%	\$181,755.1 1%	
2	O&M Expenses per Customer	\$512.9	\$451.2	\$452.5	\$474.6	\$512.9			\$586.3	\$589.3	\$672.6	\$676.4	\$680.2
3	Maintenance Expense (in thousands) Yearly Percent Increase Reference Percent Increase over adopted Amount Increase over the adopted expense Percent Increase of Adopted Year Gross Revenue Maintenance Expense per Customer Yearly Percent Increase	\$11,566.0	\$11,338.2 -2.0%	\$11,265.9 -0.6%	\$9,231.4 -18.1%	\$9,486.2 2.8%	\$13,068.3	\$13,466.7 3.0%	\$13,666.5 1.5%	\$12,451.8 -8.7%	\$12,739.9 2%	\$13,011.4 2%	\$13,487.7 1.8%
4	Maintenance Expense per Customer Yearly Percent Increase	\$44.6	\$43.6 -2.3%	\$43.1 -1.0%	\$35.2 -18.4%	\$36.1 2.4%	\$50.3	\$51.7 2.7%	\$52.3 1.2%	\$46.9 -11.3%	\$47.8 2.0%	\$48.7 1.8%	
5	A&G Expense (in thousands) Yearly Percent Increase Reference Percent Increase over adopted Amount Increase over the adopted expense Percent Increase of Adopted Year Gross Revenue A&G Expense per Customer Yearly Percent Increase	\$11,936.5	\$11,616.9 -2.7%	\$12,104.6 4.2%	\$11,270.7 -6.9%	\$10,494.8 -6.9%	\$13,581.1	\$14,358.3 5.7%	\$14,899.0 3.8%	\$14,681.7 -1.4%	\$15,729.6 7%	\$16,975.6 8%	
6	A&G Expense per Customer Yearly Percent Increase	\$46.0	\$44.6 -3.0%	\$46.3 3.8%	\$43.0 -7.2%	\$39.9 -7.2%	\$52.2	\$55.1 5.4%	\$57.0 3.5%	\$55.3 -5.4%	\$59.1 6.8%	\$63.5 7.6%	
7	District Employees Customers Emp per Thousand Percent Increase Reference District Payroll Expense (in thousands) Yearly Percent Increase Reference Percent Increase over adopted Amount Increase over the adopted expense Percent Increase of Adopted Year Gross Revenue District Payroll per thousand Customers Yearly Percent Increase	268 259,513.0 1.03	268 260,328.0 1.03	263 261,308.4 1.01	246 262,287.3 0.94	225 263,101.0 0.86	296 259,951 1.1	296 260,714 1.1	296 261,480 1.1	261 265,458 1.0	261 266,336 -0.3%	261 267,202 -0.3%	261 267,202 -0.3%
8	District Payroll Expense (in thousands) Yearly Percent Increase Reference Percent Increase over adopted Amount Increase over the adopted expense Percent Increase of Adopted Year Gross Revenue District Payroll per thousand Customers Yearly Percent Increase	\$22,550.3	\$22,808.3 1.1%	\$22,992.4 0.8%	\$19,632.8 -14.6%	\$19,137.7 -2.5%	\$24,582.7	\$26,650.5 8.4%	\$27,876.0 4.6%	\$22,747.1 -16.1%	\$23,309.6 2.5%	\$23,886.2 2.5%	\$23,886.2 2.5%
9	District Payroll per thousand Customers Yearly Percent Increase	\$86.9	\$87.6 0.8%	\$88.0 0.4%	\$74.9 -14.9%	\$72.7 -2.8%	\$94.6	\$102.2 8.1%	\$106.6 4.3%	\$85.7 -10.3%	\$87.5 2.1%	\$89.4 2.1%	

Golden State Water Company - ALL  
Minimum Data Request  
Section B. Revenue Requirement: O&M, A&G, and GO  
For significant changes see Attachment B

Item No.	Explanation	2018	Recorded 2019	2020	2021	2022	2022	Last Authorized 2023	2024	2025	Estimated 2026	2027
10	District Employees Expensed Payroll (in thousands) Yearly Percent Increase Percent Increase over adopted Amount Increase over the adopted expense Percent Increase of Adopted Year Gross Revenue District Employees Capitalized Payroll (in thousands)	\$17,209.4	\$17,325.8 0.7%	\$17,296.1 -0.2%	\$16,717.5 -3.3%	\$16,109.7 -3.6%	\$20,172.1 -20.1% (4,062.4)	\$21,869.2 8.4%	\$22,875.2 4.6%	\$19,115.6	\$19,593.0 2.5%	\$20,082.5 2.5%
11	Yearly Percent Increase GO Employees per thousand Customers Yearly Percent Increase	\$5,340.9	\$5,482.6 2.7%	\$5,696.3 3.9%	\$2,915.3 -48.8%	\$3,028.0 3.9%	\$4,410.6	\$4,781.3 8.4%	\$5,000.8 4.6%	\$3,631.5	\$3,716.6 2.3%	\$3,803.7 2.3%
12	GO Employees per thousand Customers Yearly Percent Increase	0.89	0.89 0.0%	0.97 9.1%	0.93 -3.9%	1.01 9.1%	1.08	1.07 -0.3%	1.07 -0.3%	1.26	1.25 -0.3%	1.25 -0.3%
13	GO Payroll Expense (in thousands) Yearly Percent Increase	\$21,406.9	\$22,744.6 6.2%	\$23,642.2 3.9%	\$27,918.5 18.1%	\$28,730.1 2.9%	\$25,142.5	\$27,153.9 8.0%	\$28,294.3 4.2%	\$34,746.9	\$35,511.3 2.2%	\$36,292.5 2.2%
14	Reference GO Payroll per thousand Customers Yearly Percent Increase	\$82.5	\$87.4 5.9%	\$90.5 3.6%	\$106.4 17.6%	\$109.2 2.6%	\$96.7	\$104.2 7.7%	\$108.2 3.9%	\$130.9	\$133.3 1.9%	\$135.8 1.9%
15	GO Expensed Payroll (in thousands) GO Capitalized Payroll (in thousands) Yearly Percent Increase	\$15,668.4	\$16,338.7 4.3%	\$17,051.6 4.3%	\$16,988.5 -0.4%	\$18,201.7 7.2%	\$17,534.5	\$18,937.2 7.7%	\$19,732.6 4.2%	\$21,819.7	\$22,299.7 2.2%	\$22,790.3 2.2%
16	Reference GO Capitalized Payroll per thousand Customers Yearly Percent Increase	\$22.11	\$24.6 11.3%	\$25.2 2.5%	\$41.7 65.2%	\$40.0 -4.0%	\$29.3	\$31.5 7.7%	\$32.7 3.9%	\$48.7	\$49.6 1.9%	\$50.5 1.9%
17	Number of Supervisory, Management or Executive Employees in GO Reference	65	64	67	63	67	77	77	77	91	91	91
18	Reference Sprvs., Mngt., or Exe. per thousand Customers	0.25	0.25 0.0%	0.26 4.0%	0.24 -3.8%	0.25 4.0%	0.30	0.30 0.0%	0.29 -3.3%	0.34	0.34 0.0%	0.34 0.0%
19	Allocation of General Office (in thousands)	\$42,012.4	\$41,719.5	\$43,171.0	\$43,720.4	\$45,954.6	\$43,178.0	\$44,050.6	\$45,065.8	\$57,823.0	\$60,057.7	\$62,933.9

Golden State Water Company - ALL  
Minimum Data Request  
Section C. Revenue Requirement: Water Sales and Production

Item No.	Explanation	Recorded			Last Authorized			2027				
		2018	2019	2020	2021	2022	2023		2024	2025	2026	
1	Water Production (CCF)	63,513,556	59,613,051	63,107,839	61,875,189	58,035,529	62,167,794	61,657,807	61,904,234	59,833,601	60,088,166	60,341,351
2	Purchased Water (CCF)	26,382,259	26,497,444	27,489,176	27,701,838	26,051,514	25,891,526	25,231,766	25,111,418	31,093,341	31,198,950	31,303,176
3	Pumped Water (CCF)	34,483,997	30,694,576	34,093,565	32,028,865	29,533,038	33,582,710	33,732,483	34,099,258	26,048,366	26,197,323	26,346,281
4	Treated Water (CCF)	0	0	0	0	0	0	0	0	0	0	0
5	Surface Water (CCF)	2,149,096	1,990,790	1,070,765	1,683,270	2,017,204	2,236,344	2,236,344	2,236,344	2,236,344	2,236,344	2,236,344
6	Raw Water (CCF)	0	0	0	0	0	0	0	0	0	0	0
7	Recycled Water (CCF)	498,203	430,240	454,333	461,196	433,772	457,214	457,214	457,214	455,549	455,549	455,549
8	Sales per Customers											
	METERED											
	601.11 RESIDENTIAL	134.3	127.3	138.3	135.5	123.2	130.9	129.5	129.5	123.1	123.1	123.1
	601.12 COMMERCIAL	587.4	552.0	551.4	556.7	546.0	571.7	563.0	563.7	558.7	559.7	560.8
	601.20 INDUSTRIAL	1,499.1	1,288.2	1,306.6	1,409.2	1,244.8	1,415.7	1,386.7	1,387.0	1,320.5	1,321.6	1,322.8
	601.30 PUBLIC AUTHORITY	2,186.5	1,920.3	1,975.7	2,175.5	2,027.5	2,068.1	2,046.2	2,049.9	1,991.6	1,994.2	1,996.8
	603.10 IRRIGATION	940.6	843.2	900.9	901.6	806.4	811.1	805.0	804.5	803.1	800.7	798.5
	606.00 RESALE	9,512.0	8,936.0	9,531.3	10,630.3	13,025.0	9,224.3	9,224.3	9,224.3	10,326.7	10,326.7	10,326.7
	607.00 CONTRACT	15,946.6	14,904.9	15,096.2	15,093.3	15,347.4	15,298.6	15,298.6	15,298.6	15,427.6	15,427.6	15,427.6
	609.00 OTHER	31,123.8	36,423.5	34,958.8	34,026.3	29,081.8	65,757.0	65,757.0	65,757.0	33,111.0	33,111.0	33,111.0
	FLAT RATE											
	602.10 COMMERCIAL	168.5	161.0	173.4	177.9	273.4	164.8	164.8	164.8	0.0	0.0	0.0
	602.30 PUBLIC AUTHORITY	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	604.00 PRIVATE FIRE	2.0	2.5	1.8	2.3	1.8	1.0	1.0	1.0	2.1	2.1	2.1

Golden State Water Company - ALL  
 Minimum Data Request  
 Section D. Rate Base

Item No.	Explanation	2017	2018	2019	Recorded 2020	2021	2022	Last Authorized 2022	2023	2024	Estimated 2025	2026
1	Rate Base (in thousands) Yearly Percent Increase Percent Increase over adopted Amount Increase over the adopted RB Percent Increase of Adopted Year Gross Revenue 5-yr avg per footnote 9, pg. A26, D.07-05-062	\$ 719,092	\$ 787,259	\$ 891,914	\$ 959,781	\$ 1,044,893	\$ 1,156,524	1,161,515.5	\$ 1,266,668	\$ 1,406,452	\$ 1,570,014	\$ 1,708,743
				13.29%	7.61%	8.87%	10.68%	8.4%	11.7%	11.6%	11.6%	
								-0.4%				
								(4,991.4)				
								(102,999.8)				
								-0.1%				
								-3.0%				
2	Rate Base per Customer Yearly Percent Increase	3,033.6	3,426.1	3,673.0	3,983.8	4,395.7	4,468.2	4,831.1	4,771.6	5,298.2	5,914.4	6,415.7
			12.94%	7.21%	8.46%	10.34%	8.1%	9.7%	9.7%	11.6%	11.6%	
3	Plant In Service (in thousands) Yearly Percent Increase Percent Increase over adopted Amount Increase over the adopted RB Percent Increase of Adopted Year Gross Revenue	\$ 1,519,620	\$ 1,604,852	\$ 1,650,029	\$ 1,748,618	\$ 1,857,397	1,865,036.1	1,981,100.5	\$ 1,978,454	\$ 2,136,660	\$ 2,322,154	\$ 2,489,479
			5.61%	2.82%	5.98%	6.22%	6.2%	6.2%	7.9%	8.7%	8.7%	7.2%
								-0.4%				
								(7,638.9)				
								(123,703.4)				
								-0.2%				
								-3.6%				
4	Plant In Service per Customer Percent Increase	89,505.3	94,525.4	96,723.9	102,301.7	107,969.4	110,083.6	116,309.5	113,410.9	122,479.8	133,112.9	142,101.7
			5.61%	2.33%	5.77%	5.54%	5.66%	5.66%	5.3%	6.88%	6.88%	6.75%
5	Plant Improvements Authorized and Not Built	See Attachment D.5										
6	Plant Improvements Built but Not Authorized	See Attachment D.6										
7	Plant-in Service not "used and useful"	See Attachment D.7										
8	Not "used and useful"	See Attachment D.8										

**Question 12:**

As a requirement of America's Water Infrastructure Act ("AWIA") community water systems must submit a Risk and Resilience Assessment Certification to the United States Environmental Protection Agency ("EPA").

- a. Provide a copy of the most recent Risk and Resilience Assessment Certification that GSWC has submitted to the EPA for each water system.

**Response 12:**

[Response submitted August 30, 2023](#)

**Question 13:**

Please provide searchable PDF copies of Golden State Water Company's Emergency Response Plans for each water system.

**Response 13:**

[Response submitted August 30, 2023](#)

**END OF RESPONSE**



**Golden State**

**Water Company**

A Subsidiary of American States Water Company

# **Emergency Preparedness And Response Plan**

April 2023



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## **SECTION 1. OVERVIEW**

### **Introduction**

Golden State Water Company (GSWC) has provided water service to California for over 80 years. GSWC serves drinking water in ten counties across the state of California. The company's mission is to provide customers and the communities it serves with reliable, safe quality water and excellent customer service.

We all know that emergencies have the ability to impact utility operations, and while the underlying hazards associated with these emergencies may go beyond GSWC's control, GSWC must be prepared to respond to them. GSWC prides itself in protecting the lives and well-being of its customers, employees and contractors.

GSWC's Emergency Management and Security Program is designed to continually improve the company's response to any emergency through a continuous lifecycle of training; exercises; real world experiences and implementing best practices. Through these mechanisms, GSWC continues to strengthen plans and response procedures to become more resilient during emergencies and disasters.

The Golden State Water Emergency Preparedness and Response Plan (EPRP) is an all hazards plan that supports natural incidents such as earthquakes, droughts, floods, landslides, wildfires to name a few, and manmade incidents such as violence, sabotage cybersecurity and Public Safety Power Shutoff (PSPS) emergencies. The plan does not attempt to describe every step necessary to handle a specific incident/emergency, but rather provides all hazard response guidelines and general operating procedures during an incident. The plan is not designed to be system or facility specific. The appendices supplement the plan by providing guidance and resources to support system and facility specific responses. The plan is available to all employees and can be shared with outside agencies. However, since the appendices contain confidential employee and business information, the appendices are for internal use only.

### **Purpose and Scope**

The purpose of this plan is to provide response guidance, information and tools to protect the lives and well-being of our employees, customers and contractors; minimize damage to property, while restoring service as soon as possible and continuing to operate during the incident, protect the environment, and provide public information concerning water quality, as soon as possible, to its customers and surrounding communities. Using the foundations of the Incident Command System (ICS), the EPRP is an all hazards response plan intended to cover responses to natural or manmade incidents and emergencies.

The objectives of the plan include the following:

- To provide guidelines for effective coordination of resources and communication company wide.
- To provide the standardized framework that strengthens GSWC's ability to effectively integrate into community response operations.
- Compliance with the California Emergency Service Act requirements.
- Compliance with California Public Utilities Commission General Order 103A.

### **Assumptions**

- When resources are exhausted at the district level, Managers will turn to other districts for support. In some cases, it may be more efficient to pull local resources through mutual assistance agreements and local contracts.
- Given the current effects of climate change, climate must be considered in all phases of emergency response and management, whether it be storms, wildfires, excessive rainfall.

### **Authorities and Regulations:**

GSWC meets the following authorities and regulations.

**The California Emergency Services Act:** California Government Code Section 8607.2 (a) requires all public water systems, as defined in subdivision (f) of Section 116275 of the Health and Safety Code, with 10,000 or more service connections to review and revise disaster plans.

**The American Water Infrastructure Act (AWIA):** On October 23, 2018, Congress signed into law the American Water Infrastructure Act (AWIA) (S.3021, Law 115-270). Per Section 2013 of Title II, requiring drinking water utilities serving a population of 3,300 and above to conduct a Risk and Resilience Assessment (RRA) and develop or update a corresponding Emergency Response Plan (ERP).

**The California State Water Resources Control Board, Division of Drinking Water, Public Health Notices:** The Boil Water and Unsafe Drinking Water Notification (Appendix G and H). This Plan complies with Section 1433 (b) of the Safe Drinking Water Act as amended by the Public Health Security and Bioterrorism Preparedness Act of 2002 (Public Law 107-188, Title IV – Drinking Water Security and Safety).

**The California Public Utilities Commission General Order 103A, section VII (3):** Each water utility shall have an Emergency Response Plan pursuant to the Board's requirements, as set by California Code, Government Code Section 8607.2, or its successor, and Public Utilities Code Section 768.6.

**Hazwopper Standard:** Title 8, Section 5192 of the California Code of Regulations outlines emergency response operations for releases of, or substantial threats of releases of, hazardous substances.

**The Department of Environmental Health’s Hazardous Materials Business Plans, Chapter 6.95 Health and Safety Code, Division 20, AB2185 and AB2189.** Contains site-specific procedures regarding the handling, storage, spill response and emergency contact information, as it pertains to hazardous materials.

### **Guidelines & Voluntary Standards:**

Because GSWC knows the importance of protecting the lives and well-being of our employees, customers and contractors; as well as preservation and protection of life, property, and the environment, the company will implement the following guidelines and standards, before, during and after an incident.

**The Standardized Emergency Management System (SEMS):** GSWC meets state standards on Emergency Response and Planning by following SEMS guidelines for planning, response and recovery purposes. SEMS developed by the state of California in 1991, standardizes and unifies multiple agencies and jurisdictions into a single integrated system to facilitate the flow of information and resources from the field to the state-level during an emergency. SEMS is designed to be flexible and adaptable to the needs of all emergency responders and water utilities. A component of SEMS is the Incident Command System (ICS).

**The Incident Command System (ICS):** is a standardized management structure implemented by GSWC, designed to enable effective, efficient incident management by integrating a combination of facilities, equipment, personnel, processes, procedures, and communications operating within a common organizational structure. It was developed by the State of California as a method by which earthquakes and other emergencies could be handled safely and efficiently. Flexibility is a main tenet of ICS and when implemented, it allows the development of a response structure that can expand to include government agencies and non-governmental (NGO) organizations alike. ICS is the standard that all first response agencies and critical infrastructure employ during emergencies and disasters. By using this standardized framework, GSWC can effectively integrate into community response operations using similar terminology and response structure.

**The National Incident Management System (NIMS)** is the standard approach to incident management and response, directed by Homeland Security Presidential Directive (HSPD) 5. Developed by the Department of Homeland Security (DHS) after September 11, 2001, it provides guidelines for communicating, coordinating and responding across varying levels of government, private and non-profit agencies.

### **Government Agencies:**

When necessary, the following government agencies may support GSWC’s response mission once an emergency is declared at the National, State, Regional and in some cases at the local level.

**The Federal Emergency Management Agency (FEMA)**, located within the Department of Homeland Security, is responsible for coordinating the federal government's response to natural and manmade disasters, under a nationally declared emergency. FEMA is charged with providing both immediate and long-term assistance to local and state governments as well as individuals. This includes public water utilities as a critical infrastructure. These federal resources are allocated and managed through the state.

**The California Governor's Office of Emergency Services (Cal OES)** is responsible for overseeing and coordinating emergency preparedness, response, recovery and homeland security activities within the state. Using SEMS, each local area (county) can request mutual aid through the Cal OES regions (Coastal Region, Inland Region, Southern Region). The regions serve as the conduit between local and state and provide a physical presence for Cal OES functions during a state declared emergency.

#### **Emergency Management Organizations/Entities:**

To promote and continue to improve resiliency within GSWC, develop partnerships with other critical infrastructure partners and the communities it serves, it is important to be a part of organizations to stay informed of changes within the area of emergency management and business resiliency. GSWC is partnered and/or apart of the following organizations/entities.

**California Utility Emergency Association (CUEA)**, functions as a point of contact to Cal OES for critical infrastructure utilities; such as: power, water, telecommunications, transportation and gas to facilitate resource needs during an emergency and provide members situational awareness of impacts during an emergency affecting the state and counties we serve. They facilitate coordination and planning among the utilities. GSWC serves as an elected board member and represents other water utilities, regarding water related interests and concerns, and changes that need to occur within the water industry to promote and improve planning, response and recovery.

#### **California Water/Wastewater Agency Response Network (CalWARN)**

The mission of the CalWARN is to support and promote statewide emergency preparedness, disaster response and mutual assistance for public and private water and wastewater utilities. GSWC is an elected board member and assists as a point of contact for water utilities and to coordinate and communicate needs before and during emergencies.

#### **Water Emergency Response Organization of Orange County (WEROC)**

The WEROC administered by the Municipal Water District of Orange County (MWDOC) supports and manages countywide emergency preparedness, planning, response, and recovery efforts among Orange County water and wastewater utilities. The WEROC provides GSWC essential resources, such as valuable information on incidents or emergencies that are affecting water agencies within, and around the county, they conduct trainings and provide available resources during an emergency.

**California Resiliency Alliance (CRA):** A non-profit information sharing platform, sitting at the nexus between the public and private sectors facilitating cross-sector, cross-industry partnerships to empower local and regional resilience. Membership is comprised of individuals from the private and public sectors, including government, NGOs and private industry, with resilience related responsibilities.

**California Water Association (CWA)** Represents regulated water utilities in California. Their mission is to represent the interests of California investor-owned water companies, provide a forum for sharing best management practices, a means of promoting sound water policy by legislators and regulatory agencies, and opportunities for educating the public on the protection and efficient use of water resources.

**Southern California Critical Lifelines.** Supports power, gas, water, telecommunications and transportation sectors in planning and preparing for emergencies; in particular looking at the interdependencies among the industries and how emergencies affect all sectors across the board. This group highlights and facilitates on-going outreach and communications across the sectors

## **SECTION 2. GSWC EMERGENCY RESPONSE PLANNING**

GSWC reviews and updates the Emergency Preparedness and Response Plan (EPRP) and all its appendices regularly. A thorough review of the plan is conducted and specific district plans are reviewed with district staff and changes implemented annually. However, because the EPRP is a living document changes can occur any time of the year.

Every year a series of exercises are conducted to review where response staff is in terms of their knowledge, awareness and response capabilities. The Exercise Planning Team comes together to develop, coordinate and conduct these exercises. The Exercise Planning Team includes representatives from varying disciplines and subject matter expertise. Exercises provide a refresher for employees that have specific roles they conduct during emergencies and gives those individuals with new roles an opportunity to learn their roles and responsibilities. After the exercises are completed an after-action review is conducted to outline lessons learned and work to develop new training opportunities, tools, and guidance. Overall, exercises provide an opportunity to revise plans, review needs and implement improvements.

Training is conducted on an on-going bases throughout the year and provides employees a series of trainings through varying platforms such as classroom set up, one-on-one tutorials, virtual webinars or through the GSWC internal learning management system. Some of the trainings implemented include; ICS, protocols for effectively communicating, roles and responsibilities and trainings regarding specific threats. Training is provided at varying levels and catered to specific audiences.

Through the American Water Infrastructure Act (AWIA), GSWC conducts Risk and Resiliency Assessments of company-wide operations and plant sites. Specific areas of company operations are assessed and through this process, vulnerabilities and gaps are identified for improvement, followed by updates to the EPRP. Certifications are submitted every five years per applicable plant site.

As mentioned in section one, GSWC is involved with various emergency management organizations and entities to facilitate outreach, maintain situational awareness, participate in mutual assistance agreements, access resources and stay current with best practices. Developing relationships with the first response community has always been a priority for GSWC. In addition, having contacts within the water industry and other cross-functional industries, such as electric, gas and telecommunications are vital to effective emergency management and to address critical infrastructure interdependencies. This network of contacts promotes resiliency throughout the company and the communities we serve.

mitigation activities designed to limit the loss of life, personal injury, property damage, and other unfavorable outcomes.

## **S**

**Span of Control:** The number of individuals a supervisor is responsible for, usually expressed as the ratio of supervisors to individuals. (Under the NIMS, an appropriate span of control is between 1:3 and 1:7.)

**Staging Area:** Location established where resources can be placed. The IC is responsible for identifying the staging area.

**Standard Operating Procedure (SOP):** Document that provides purpose, authorities, duration, and details for the preferred method of performing a single function/action or a number of interrelated functions in a uniform manner.

**Strategic:** EOC responsibilities, established priorities at a higher-level to ensure the IC receives all the necessary resources during a response and resources are strategically pulled from other areas within the company.

## **T**

**Threat:** An indication of possible violence, harm, or danger.

**Tools:** Those instruments and capabilities that allow for the professional performance of tasks, such as information systems, agreements, doctrine, capabilities, and legislative authorities.



**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 3:38:54 PM

---

EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER CO - APPLE VLY SOUTH risk and resilience assessment certification for PWSID CA3610107 with population 6247.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 7:03:44 AM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER CO - ARDEN WATER SERV risk and resilience assessment certification for PWSID CA3410003 with population 5154.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 10:12:06 AM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GSWC - ARTESIA risk and resilience assessment certification for PWSID CA1910004 with population 48308.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 3:43:11 PM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER CO - BARSTOW risk and resilience assessment certification for PWSID CA3610043 with population 31611.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 7:07:19 AM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER COMPANY - BAY POINT risk and resilience assessment certification for PWSID CA0710002 with population 22368.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [Hancocks, Brandyn](#)  
**To:** [Tejada, Karla](#); [Pillai, Sunil K.](#)  
**Subject:** FW: Risk and resilience assessment certification receipt Bell Bell Gardens  
**Date:** Tuesday, December 29, 2020 4:23:15 PM

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Brandyn Hancocks  
Compliance Manager  
Environment, Safety, Emergency Preparedness, Training & Development  
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email: [bhancocks@gswater.com](mailto:bhancocks@gswater.com)

-----Original Message-----

From: [scs@epacdx.net](mailto:scs@epacdx.net) <[scs@epacdx.net](mailto:scs@epacdx.net)>  
Sent: Tuesday, December 29, 2020 4:18 PM  
To: Hancocks, Brandyn <[Brandyn.Hancocks@gswater.com](mailto:Brandyn.Hancocks@gswater.com)>  
Subject: Risk and resilience assessment certification receipt

EXTERNAL EMAIL

EPA acknowledges on 12/29/2020 receipt of GSWC - BELL, BELL GARDENS risk and resilience assessment certification for PWSID CA1910011 with population 57889.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 3:33:25 PM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GSWC - CALIPATRIA risk and resilience assessment certification for PWSID CA1310003 with population 4425.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 3:55:48 PM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GSWC - CLAREMONT risk and resilience assessment certification for PWSID CA1910024 with population 37317.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.



**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 6:48:25 AM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER CO.-CLEARLAKE SYSTEM risk and resilience assessment certification for PWSID CA1710002 with population 4104.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 6:58:11 AM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER CO. - CORDOVA risk and resilience assessment certification for PWSID CA3410015 with population 45335.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 7:43:39 AM

---

EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WC - COWAN HEIGHTS risk and resilience assessment certification for PWSID CA3010047 with population 7233.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 10:01:06 AM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GSWC - CULVER CITY risk and resilience assessment certification for PWSID CA1910030 with population 36192.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [Hancocks, Brandyn](#)  
**To:** [Tejada, Karla](#); [Pillai, Sunil K.](#)  
**Subject:** FW: Risk and resilience assessment certification receipt - Florence Graham  
**Date:** Tuesday, December 29, 2020 4:23:16 PM

---

Brandyn Hancocks  
Compliance Manager  
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Phone: 916.853.3639 Cell: 916.719.9209 Fax: 916.852.0171  
email: [bhancocks@gswater.com](mailto:bhancocks@gswater.com)

-----Original Message-----

From: [scs@epacdx.net](mailto:scs@epacdx.net) <[scs@epacdx.net](mailto:scs@epacdx.net)>  
Sent: Tuesday, December 29, 2020 4:23 PM  
To: Hancocks, Brandyn <[Brandyn.Hancocks@gswater.com](mailto:Brandyn.Hancocks@gswater.com)>  
Subject: Risk and resilience assessment certification receipt

EXTERNAL EMAIL

EPA acknowledges on 12/29/2020 receipt of GSWC - FLORENCE/GRAHAM risk and resilience assessment certification for PWSID CA1910077 with population 65878.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 10:16:29 AM

---

EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GSWC - HOLLYDALE risk and resilience assessment certification for PWSID CA1910195 with population 7701.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 7:57:57 AM

---

EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER COMPANY - LOS OSOS risk and resilience assessment certification for PWSID CA4010017 with population 5525.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 8:04:55 AM

---

EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER COMPANY - NIPOMO risk and resilience assessment certification for PWSID CA4010018 with population 4415.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.



**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 10:20:34 AM

---

EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GSWC - NORWALK risk and resilience assessment certification for PWSID CA1910098 with population 43893.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 8:09:53 AM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER COMPANY - ORCUTT risk and resilience assessment certification for PWSID CA4210016 with population 32157.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [Hancocks, Brandyn](#)  
**To:** [Pillai, Sunil K.](#); [Tejada, Karla](#)  
**Subject:** FW: Risk and resilience assessment certification receipt - Placentia/Yorba Linda  
**Date:** Tuesday, December 29, 2020 4:18:23 PM

---

Brandyn Hancocks  
Compliance Manager  
Environment, Safety, Emergency Preparedness, Training & Development  
Golden State Water Company  
Phone: 916.853.3639 Cell: 916.719.9209 Fax: 916.852.0171  
email: [bhancocks@gswater.com](mailto:bhancocks@gswater.com)

-----Original Message-----

From: [scs@epacdx.net](mailto:scs@epacdx.net) <[scs@epacdx.net](mailto:scs@epacdx.net)>  
Sent: Tuesday, December 29, 2020 4:13 PM  
To: Hancocks, Brandyn <[Brandyn.Hancocks@gswater.com](mailto:Brandyn.Hancocks@gswater.com)>  
Subject: Risk and resilience assessment certification receipt

EXTERNAL EMAIL

EPA acknowledges on 12/29/2020 receipt of GOLDEN STATE WC - PLACENTIA/YORBA LINDA risk and resilience assessment certification for PWSID CA3010035 with population 53644.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [Hancocks, Brandyn](#)  
**To:** [Pillai, Sunil K.](#); [Tejada, Karla](#)  
**Subject:** FW: Risk and resilience assessment certification receipt - San Dimas  
**Date:** Tuesday, December 29, 2020 4:18:22 PM

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Brandyn Hancocks  
Compliance Manager  
Environment, Safety, Emergency Preparedness, Training & Development  
Golden State Water Company  
Phone: 916.853.3639 Cell: 916.719.9209 Fax: 916.852.0171  
email: [bhancocks@gswater.com](mailto:bhancocks@gswater.com)

-----Original Message-----

From: [scs@epacdx.net](mailto:scs@epacdx.net) <[scs@epacdx.net](mailto:scs@epacdx.net)>  
Sent: Tuesday, December 29, 2020 4:08 PM  
To: Hancocks, Brandyn <[Brandyn.Hancocks@gswater.com](mailto:Brandyn.Hancocks@gswater.com)>  
Subject: Risk and resilience assessment certification receipt

EXTERNAL EMAIL

EPA acknowledges on 12/29/2020 receipt of GSWC-SAN DIMAS risk and resilience assessment certification for PWSID CA1910142 with population 55004.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 8:16:54 AM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER COMPANY - SIMI VALLEY risk and resilience assessment certification for PWSID CA5610059 with population 43670.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 4:48:05 PM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GSWC-SOUTH ARCADIA risk and resilience assessment certification for PWSID CA1910212 with population 26970.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [Pillai, Sunil K.](#)  
**To:** [Tejada, Karla](#)  
**Cc:** [Hancocks, Brandyn](#)  
**Subject:** FW: Risk and resilience assessment certification receipt  
**Date:** Monday, March 30, 2020 3:10:07 PM

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-----Original Message-----

From: scs@epacdx.net <scs@epacdx.net>  
Sent: Monday, March 30, 2020 3:10 PM  
To: Pillai, Sunil K. <Sunil@gswater.com>  
Subject: Risk and resilience assessment certification receipt

EXTERNAL EMAIL

EPA acknowledges on 3/30/2020 receipt of GSWC - SOUTHWEST risk and resilience assessment certification.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov).

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 4:57:33 PM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GSWC-SOUTH SAN GABRIEL risk and resilience assessment certification for PWSID CA1910223 with population 27843.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.



**From:** [Pillai, Sunil K.](#)  
**To:** [Tejada, Karla](#)  
**Cc:** [Hancocks, Brandyn](#)  
**Subject:** FW: Risk and resilience assessment certification receipt  
**Date:** Monday, March 30, 2020 3:11:44 PM

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-----Original Message-----

From: scs@epacdx.net <scs@epacdx.net>  
Sent: Monday, March 30, 2020 3:12 PM  
To: Pillai, Sunil K. <Sunil@gswater.com>  
Subject: Risk and resilience assessment certification receipt

EXTERNAL EMAIL

EPA acknowledges on 3/30/2020 receipt of GOLDEN STATE WC - WEST ORANGE risk and resilience assessment certification.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov).

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 10:27:51 AM

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EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GSWC - WILLOWBROOK risk and resilience assessment certification for PWSID CA1910072 with population 11004.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

**From:** [scs@epacdx.net](mailto:scs@epacdx.net)  
**To:** [Hancocks, Brandyn](#)  
**Subject:** Risk and resilience assessment certification receipt  
**Date:** Friday, June 25, 2021 3:46:30 PM

---

EXTERNAL EMAIL

EPA acknowledges on 6/25/2021 receipt of GOLDEN STATE WATER CO - WRIGHTWOOD risk and resilience assessment certification for PWSID CA3610047 with population 4419.

If you have any questions please email us at [dwresilience@epa.gov](mailto:dwresilience@epa.gov)

Thank you.

# **Attachment 2-1: Environmental Social Justice and Action Plan Responses**



August 30, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-001 (A.23-08-010)  
Due Date: August 30, 2023      Extension Due Date: September 5, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

On April 30th, 2020, GSWC submitted the report, Measures to Improve Customer Service from January to December 2019. In the past, GSWC provided similar reports for the years 2015 to 2019. Has GSWC created any similar reports for any of the years 2020, 2021, 2022, or 2023? If so, please provide all reports for these years. If GSWC did not create additional reports, please confirm.

**Response 1:**

GSWC prepared similar reports for 2020 and 2021, which are attached. GSWC did not create reports for 2022 or 2023. Refer to PDFs titled "[SRA-001 Q.1 Measures to Improve Customer Service\\_Jan to Dec\\_2020](#)" and "[SRA-001 Q.1 Measures to Improve Customer Service\\_Jan to Dec\\_2021](#)".

**Question 2:**

The CPUC has created the Environmental and Social Justice (ESJ) Action Plan to serve as a commitment to furthering ESJ principles. Has GSWC created any measures for environmental social justice to date? If so please provide the details. If GSWC has not created any measures, please confirm.

**Response 2:**

Golden State Water Company (GSWC) has the following initiatives related to Environmental Social Justice.

**1. Reducing Greenhouse Gas (GHG) emissions**

We studied our GHG emissions levels, set a 2020 baseline, and developed a GHG emissions reduction target of 60% by 2035 from the 2020 baseline. In 2022, GSWC adjusted its electricity purchasing practices to procure more renewable power than in the past. Estimates demonstrate that this will reduce annual Scope 2 emissions, on our way to a goal of reducing Scope 1 and 2 emissions by 60% by 2035.

**2. Mitigating climate change and weather effects**

Over the last three years, GSWC has identified critical water production sites, treatment plants, and pumping plants that could be prone to Public Safety Power Shutoff (PSPS) actions. PSPS allows large power grid operators to de-energize the power grid when weather forecasts predict periods of high winds in areas with low humidity and unmanaged underbrush. Continuing to build resiliency into our service delivery in the face of numerous climate risks is more critical than ever – and consistent with the State’s 2020 Water Resilience Portfolio mandates.

**3. Water conservation and customer communication/education**

As the drought has continued to challenge California, our conservation rate structure, communication and education initiatives have paid off. Since 2007, GSWC customers have cooperatively chosen to cut their water usage per customer by 36.5%.

**4. Providing safe and reliable service to all customers**

GSWC continues to invest to improve water reliability and to reduce water loss throughout our systems, including investments in environmental control facilities.

**5. Ensuring water supply**

We are focused on consistently improving our resiliency and water supply diversification through groundwater infrastructure improvements, which will help meet the needs of our communities with valuable local water supply and ensure that high quality groundwater supplies are available for future generations.

**6. Uninterrupted water supply**

Our objective to build increasingly resilient operations to meet customer service expectations is reflected in multiple projects, including implementation of backup power generation in several locations and renewable power generation to help best meet water supply demands during the summer months when the risk of extended electrical power outages is high. Additionally, our ongoing pipeline management program focuses on the timely replacement of aged pipelines to mitigate the risk of service interruptions due to age related pipeline failures.

## **7. Public safety**

Numerous public safety projects are a focus for the company, including our commitment to site remediation (reducing the risk of groundwater contamination and protecting aboveground water infrastructure from damage due to wildfires), the deployment of “smart” water tools such as water quality analyzers (alerting water operators to unusual system activity in a timely manner), and water main flushing (improving water quality with reduced water loss).

## **8. Supplier diversity**

Golden State Water’s spending with diverse suppliers increased to 33.7% in 2022, exceeding the CPUC’s target of 22.0% for the tenth consecutive year.

## **9. Engaging with our communities**

GSWC continues to emphasize community engagement and were grateful to see the increase in live events for 2022. We were able to double our community service hours at GSWC. Continuing the successful utilization of social media platforms, online venues and meetings developed during the pandemic, we continued to engage customers and community leaders in these expanded venues. We have also consistently made charitable contributions to non-profit organizations.

## **10. Diversity & Inclusion**

GSWC seeks to promote the benefits of diversity in all of our business activities and oppose discrimination of any kind with a nondiscrimination policy and Diversity & Inclusion Policy.

## **11. Affordable access to water**

GSWC is committed to balancing the goal of providing the highest quality and reliability of water service with the overall cost of service to our customers, subject to applicable federal and state laws and regulations, and orders of regulatory bodies. The Board of Directors has adopted a policy of providing access to safe, clean and affordable water adequate for human consumption, cooking, and sanitary purposes in all states in which we operate.

## **12. Low-income or disadvantaged assistance programs**

At GSWC, we offer customer assistance programs to help low-income or disadvantaged households pay for water services, as well as protection for qualified military personnel during periods of full-time deployment. We also offer payment plans to our customers, giving them options to make smaller payments on outstanding bills without incurring penalties. We continue to promote participation in the Low Income Household Water Assistance Program (LIHWAP). In 2022, we also received \$9.5M from the California Water and Wastewater Arrearage Program

(CWWAPP) and applied the funds to COVID related past due balances to approximately 19,000 accounts.

**13. Providing economic benefits to low-income and disadvantaged communities**

Through our investments in capital infrastructure, as well as ongoing operations, GSWC generates significant economic benefits to the local and regional economies where we do business. GSWC employs over 500 employees in the state, providing jobs as well as the indirect economic effects that result.

**14. Water quality for all customers**

GSWC ensures our customers receive quality water that they consume and use on a daily basis. That is our focus and we've devoted significant resources to do so. High quality water is essential to our customer's health and the trust they place in us as their water provider.

**Question 3:**

GSWC published a Corporate Social Responsibility Report in 2019 as advertised on the American States Water website. Did GSWC publish any Corporate Social Responsibility Report for the years 2020,2021,2022, or 2023? If so please provide all reports for these years. If GSWC did not create these additional reports, please confirm.

**Response 3:**

A 2020-2021 ESG report (formerly titled Corporate Social Responsibility Report) is published and available at the company's website.

<https://americanstateswatercompany.gcs-web.com/static-files/9cf112f5-2d5c-4d2a-a889-8948ba4150c5>.

The company publishes the ESG report every other year and have also published Addendums in between the full ESG reports when needed. There is currently an Addendum to this report under the same ESG section on the website. We will publish another full ESG report in 2024 for 2022-2023. A copy of the 2020-2021 ESG report and its Addendum are attached as PDFs "**SRA-001 Q.3 ESG Report 2020-21**" and "**SRA-001 Q.3 ESG Report 2020-21 Addendum**".

**Question 4:**

Referring to A.20-07-012, GSWC's past response to Cal Advocates' Data Request, JMI-014, Attachment JMI-014, GSWC indicated that it has implemented an informal complaint process for calls that distributes and tracks all informal complaints received and processed as cases in their Customer Care and Building (CC&B). GSWC further stated that those complaints are stored in a monitoring log. Please explain the procedures followed using



this system to investigate complaints such as water quality, billing, rates, policy and practice, service, etc.

**Response 4:**

Response is pending

**Question 5:**

The scheduled appointment rate for GSWC in 2018 was 7.51%. Please provide updated data for the scheduled appointment rate for years 2019, 2020, 2021, 2022 and 2023.

**Response 5:**

Response is pending

**Question 6:**

Provide GSWC's policy manual detailing the system of how the high bill and leak adjustment request resolution is investigated and mitigated.

**Response 6:**

Response is pending

**Question 7:**

Please explain how GSWC calculates that customer calls have been answered within 30 seconds (during normal business hours) after requesting to speak with a Customer Service Representative ("CSR"). Provide a sample calculation with all supporting data.

- a. Explain whether GSWC was able to answer customer calls within 30 seconds for the years 2019,2020,2021,2022, and 2023. Provide all supporting data.

**Response 7:**

Response is pending

**Question 8:**

Please provide a copy of a sample customer bill for years 2020,2021,2022, and 2023.

**Response 8:**

Response is pending

**Question 9:**

Please provide a sample copy of a customer bill showing imposition of the drought surcharge from 2020,2021,2022, and 2023.

**Response 9:**

Response is pending

**Question 10:**

The CPUC Consumer Affairs Branch's ("CAB") customer complaints,show a customer in Zip code: 90746, City: Carson with Case Number: 50487, who submitted an informal complaint on 1/17/2020 detailing a high bill received. Please provide the 2020 bill receipts of the customer from January 2020 to December 2021.

**Response 10:**

Response is pending

**Question 11:**

The CPUC Consumer Affairs Branch's ("CAB") customer complaints show a customer in Zip code: 95670, City: Rancho Cordova, and Case number :516437, who submitted a complaint concerning a high bill of \$648 for June 2020. Please provide a copy of the customer's bill from January 2020 to December 2020.

**Response 11:**

Response is pending

**Question 12:**

As a requirement of America's Water Infrastructure Act ("AWIA") community water systems must submit a Risk and Resilience Assessment Certification to the United States Environmental Protection Agency ("EPA").

- a. Provide a copy of the most recent Risk and Resilience Assessment Certification that GSWC has submitted to the EPA for each water system.

**Response 12:**

The Risk and Resiliency Assessment Certification was completed online via an EPA portal, and an email from EPA was received verifying receipt of certification. See folder titled "SRA-001 Q.12 RRA Certifications".

**Question 13:**

Please provide searchable PDF copies of Golden State Water Company's Emergency Response Plans for each water system.

**Response 13:**

GSWC has one plan for all our systems. Please refer to searchable PDF “SRA-001 Q.13 Emergency Response Plan”.

The plan is available to all employees and can be shared with outside agencies. However, since the appendices contain confidential employee and business information, the appendices are confidential and for internal use only.

**END OF RESPONSE**



September 5, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-001 (A.23-08-010) – Partial Response 2  
Due Date: August 30, 2023      Extension Due Date: September 5, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

On April 30th, 2020, GSWC submitted the report, Measures to Improve Customer Service from January to December 2019. In the past, GSWC provided similar reports for the years 2015 to 2019. Has GSWC created any similar reports for any of the years 2020, 2021, 2022, or 2023? If so, please provide all reports for these years. If GSWC did not create additional reports, please confirm.

**Response 1:**

[Response submitted August 30, 2023](#)

**Question 2:**

The CPUC has created the Environmental and Social Justice (ESJ) Action Plan to serve as a commitment to furthering ESJ principles. Has GSWC created any measures for environmental social justice to date? If so please provide the details. If GSWC has not created any measures, please confirm.

**Response 2:**

[Response submitted August 30, 2023](#)

**Question 3:**

GSWC published a Corporate Social Responsibility Report in 2019 as advertised on the American States Water website. Did GSWC publish any Corporate Social Responsibility Report for the years 2020,2021,2022, or 2023? If so please provide all reports for these years. If GSWC did not create these additional reports, please confirm.

**Response 3:**

Response submitted August 30, 2023

**Question 4:**

Referring to A.20-07-012, GSWC's past response to Cal Advocates' Data Request, JMI-014, Attachment JMI-014, GSWC indicated that it has implemented an informal complaint process for calls that distributes and tracks all informal complaints received and processed as cases in their Customer Care and Building (CC&B). GSWC further stated that those complaints are stored in a monitoring log. Please explain the procedures followed using this system to investigate complaints such as water quality, billing, rates, policy and practice, service, etc.

**Response 4:**

GSWC follows a similar system to investigate complaints. For complaints such as water quality and high bills, GSWC tracks these complaints received and process as cases in our Customer Care and Billing (CC&B). GSWC will make every effort to resolve a customer complaint or inquiry at the initial contact. If a resolution cannot be reached in the first contact, the CSR will schedule an investigation.

Investigations are generally conducted with the customer present as often as possible. If contact is made, the Water Distribution Operator will conduct a field investigation by documenting their investigation. If no contact is made, the Water Distribution Operator will leave a door-tag stating the current read, results of investigation, date, time and contact information. After the field investigation is returned completed, the CSA Superintendent is notified and will review investigation results and make a final decision and designate within the case as a "Complaint" or "Inquiry".

For concerns regarding rates, or policy, GSWC will provide the customer with applicable Rules and Tariffs.

**Question 5:**

The scheduled appointment rate for GSWC in 2018 was 7.51%. Please provide updated data for the scheduled appointment rate for years 2019, 2020, 2021, 2022 and 2023.

**Response 5:**

Year	Schedule Appointment Rate
2019	1.05
2020	2.68
2021	3.8
2022	4.53
2023	5.56

**Question 6:**

Provide GSWC’s policy manual detailing the system of how the high bill and leak adjustment request resolution is investigated and mitigated.

**Response 6:**

GSWC will make every effort to resolve a customer’s high bill complaint or inquiry at the initial contact. A customer service representative (CSR) will gather information about the account and the billing issue, which includes reviewing consumption history, billing history, meter readings, and payment records. If a resolution cannot be reached in the first contact, the CSR will schedule an investigation. GSWC tracks high bill complaints received and processes as cases in our Customer Care and Billing (CC&B). Investigations are generally conducted with the customer present as often as possible. If contact is made, the Water Distribution Operator will conduct a field investigation by documenting their investigation. If no contact is made, the Water Distribution Operator will leave a door-tag stating the current read, results of investigation, date, time and contact information.

After the field investigation is returned completed, the CSR will review investigation results for a customer follow up. If the investigation verifies the meter was misread, a request will be forwarded to billing group to issue a corrected bill. Once new bill is corrected, call customer back with the final high bill inquiry resolution and outcome. Follow up calls will be made when a customer was not present or when the investigation indicates that the customer was not satisfied with the results. After discussing the results with the customer, a Customer Service Supervisor may approve a second high bill investigation (when the customer was not present for a high bill investigation), may request usage data logs (if available) or request a meter test to be conducted. After all investigations are returned completed, the Customer Service Supervisor is notified and will review investigation results and make a final decision and designate within the case as a “Complaint” or “Inquiry”.

During the investigation if it is determined that the high bill was due to a customer leak, a leak adjustment may be offered.

When a GSWC customer experiences a water leak and believes they meet the eligibility criteria for a leak adjustment, they must make a written request. In their request,

customers must explain the cause of the leak, where it occurred, and provide all relevant details.

Proof of Repair: Customers are required to submit sufficient proof that the leak has been repaired within a reasonable amount of time. This proof may include:

- Repair invoice or payment receipt that includes the address, date, and nature of the work if the repair was done by a contractor.
- If the customer performed the repair themselves, they must provide a brief written explanation of the repairs performed and copies of invoices or receipts for repair parts.

GSWC may require field verification to confirm that the leak repair has been completed before considering a leak adjustment. The leak adjustment request will be reviewed and authorized by the Golden State Water Company’s Customer Service Supervisor. Only one billing cycle demonstrating unusual usage due to a leak will be eligible for an adjustment.

Submissions with incomplete information or missing documentation will be denied. GSWC will compare the customer's prior seasonal water usage to the water usage during the leak period to calculate the water loss to determine the adjustment amount. All customers requesting a billing adjustment are required to pay their bill in full or make payment arrangements while their adjustment request is being processed. The maximum adjustment will not exceed 50% of the water loss. A CSR will contact the customer once a decision is made, if the adjustment is granted and it will appear on the customer's next water bill.

**Question 7:**

Please explain how GSWC calculates that customer calls have been answered within 30 seconds (during normal business hours) after requesting to speak with a Customer Service Representative (“CSR”). Provide a sample calculation with all supporting data.

- a. Explain whether GSWC was able to answer customer calls within 30 seconds for the years 2019,2020,2021,2022, and 2023. Provide all supporting data.

**Response 7:**

The formula below has been configured in the CSC call management system to track the percentage of calls that are answered within 30 seconds.

Calculation name	Calculation	Description
ART (Actual Relative to Target)	$(100 * \text{TARGETACDCALLS} / \text{CALLSOFFERED}) - \text{TARGETPERCENT}$	This calculation determines the actual service level as compared to the target service level percentage.

**Response 7.a.:**

- 2019 – 75.25%: The average staff shrinkage was -18.50% in unplanned absences and staff turnover.
- 2020 – 82.59%
- 2021 – 87.24%
- 2022 – 61.21%: There were 35,000 more calls in Q3 & Q4 2022 vs. Q3 & Q4 2021, due to the resumption of disconnections for non-payment. The average staff shrinkage was -30%, due to sick/FMLA leave use and staff turnover.
- 2023 – 54.22%: YTD calls are 9% (+14,752) higher compared to the same period in 2022. The YTD average staff shrinkage is -32%, due to sick/FMLA leave use and staff turnover.

**Question 8:**

Please provide a copy of a sample customer bill for years 2020,2021,2022, and 2023.

**Response 8:**

Please refer to PDF file “SRA-001 Q.8 2020-23 Customer Bills”.

**Question 9:**

Please provide a sample copy of a customer bill showing imposition of the drought surcharge from 2020,2021,2022, and 2023.

**Response 9:**

Please refer to PDF file “SRA-001 Q.9 2020-23 Customer Bills”.

**Question 10:**

The CPUC Consumer Affairs Branch’s (“CAB”) customer complaints,show a customer in Zip code: 90746, City: Carson with Case Number: 50487, who submitted an informal complaint on 1/17/2020 detailing a high bill received. Please provide the 2020 bill receipts of the customer from January 2020 to December 2021.

**Response 10:**

On August 30, Cal Advocates confirmed the term “bill receipts” is in reference to a customer bill; and that this request should be for 12 months, starting January 2020 to December 2020. Please refer to PDF file “SRA-001 Q.10 Jan to Dec 2020”.



**Question 11:**

The CPUC Consumer Affair Branch’s (“CAB”) customer complaints show a customer in Zip code: 95670, City: Rancho Cordova, and Case number :516437, who submitted a complaint concerning a high bill of \$648 for June 2020. Please provide a copy of the customer’s bill from January 2020 to December 2020.

**Response 11:**

[Please refer to PDF file “SRA-001 Q.11 Jan to Dec 2020”.](#)

**Question 12:**

As a requirement of America’s Water Infrastructure Act (“AWIA”) community water systems must submit a Risk and Resilience Assessment Certification to the United States Environmental Protection Agency (“EPA”).

- a. Provide a copy of the most recent Risk and Resilience Assessment Certification that GSWC has submitted to the EPA for each water system.

**Response 12:**

[Response submitted August 30, 2023](#)

**Question 13:**

Please provide searchable PDF copies of Golden State Water Company’s Emergency Response Plans for each water system.

**Response 13:**

[Response submitted August 30, 2023](#)

**END OF RESPONSE**



December 11, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-006 (A.23-08-010)  
ESJ  
Due Date: December 12, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

Refer to SRA -001 Response Q.2, GSWC claimed to have 14 initiatives related to Environmental Social Justice. Please list and provide additional details for each of the 14 initiatives. To the extent not already included in the 14 initiatives listed, please also provide all current projects GSWC has and will complete that aligns with the Commission's Environmental Social Justice Action Plan. Please provide detail explanations and how such projects directly relate to ESJ's Action Plan.

**Response 1:**

As stated in response to SRA-001 Q.2, Golden State Water Company (GSWC) has the following initiatives related to the CPUC's Environmental and Social Justice Action Plan, and associated projects have been listed below each initiative (projects in those service areas which CalEPA has specifically identified as 'disadvantaged communities' – see attached 'SRA-006 DAC Map' – are *italicized*).

**1. Reducing Greenhouse Gas (GHG) emissions**

We studied our GHG emissions levels, set a 2020 baseline, and developed a GHG emissions reduction target of 60% by 2035 from the 2020 baseline. In 2022, GSWC adjusted its electricity purchasing practices to procure more renewable power than

in the past. Estimates demonstrate that this will reduce annual Scope 2 emissions, on our way to a goal of reducing Scope 1 and 2 emissions by 60% by 2035.

The following projects help reduce GHG emissions (reduce pumping/optimize operations) and procure more renewable power:

- Pipeline Management Program (pipeline replacement in all Systems)
- *Barstow System, Hydraulic Evaluation*
- Navajo Tank Zone Looping (Morongo Del Norte)
- Upper Pressure Zones, Hydraulic Evaluation (Morongo Del Sur)
- Apple Valley North System, Supply Evaluation
- Sutter and Baker Zones, Hydraulic Evaluation (Lucerne Valley)
- *Holabird Plant, Solar Generation (Calipatria)*
- Kiowa Plant, Solar Generation (Apple Valley South)

## **2. Mitigating climate change and weather effects**

Over the last three years, GSWC has identified critical water production sites, treatment plants, and pumping plants that could be prone to Public Safety Power Shutoff (PSPS) actions. PSPS allows large power grid operators to de-energize the power grid when weather forecasts predict periods of high winds in areas with low humidity and unmanaged underbrush. Continuing to build resiliency into our service delivery in the face of numerous climate risks is more critical than ever – and consistent with the State’s 2020 Water Resilience Portfolio mandates.

The following projects help achieve additional resiliency in operations by installing critical backup power generation:

- *Folsom South Canal, Install Back-up Generator (Cordova)*
- *Pyrites WTP, Install Back-up Generator (Cordova)*
- *Centralia Plant, Install Back-up Generator (Artesia)*
- *Imperial Plant, Install Back-up Generator (Norwalk)*
- *Bissell Plant, Install Back-up Generator (Bell-Bell Gardens)*
- *Miramonte Plant, Install Back-up Generator (Florence-Graham)*
- *McKinley Plant, Install Back-up Generator (Hollydale)*
- *Systemwide, Install Back-up Generators in various plant sites (Southwest)*
- Timberline Plant, Install Production Meter, Permanent Generator, Replace Hydropneumatic Tank (Cowan Heights)
- *South San Gabriel System, Install Genset to Garvey, San Gabriel, and Saxon Plant Sites*
- *Barstow System, Install Back-up Generators - Phase 1*

## **3. Water conservation and customer communication/education**

As the drought has continued to challenge California, our conservation rate structure, communication and education initiatives have paid off. Since 2007, GSWC customers have cooperatively chosen to cut their water usage per customer by 36.5%.

The following projects help address water conservation and improve customer communication/education:

- Pipeline Management Program (pipeline replacement in all Systems)
- *AMI Pilot Project (Claremont)*
- *Bay Point System, Recycled Water Study*
- *Systemwide, Drought Tolerant Landscaping - Artesia System*
- *Systemwide, Drought Tolerant Landscaping for Norwalk System*
- *Systemwide, Drought Tolerant Landscaping for Bell-Bell Gardens System*
- *Systemwide, Drought Tolerant Landscaping for Florence Graham System*
- *Systemwide, Drought Tolerant Landscaping for Hollydale System*
- *Systemwide, Drought Tolerant Landscaping for Willowbrook System*
- *Systemwide, Drought Tolerant Landscaping for Culver City System*
- *Systemwide, Drought Tolerant Landscaping for Southwest System*
- *West Orange System, Drought Tolerant Landscaping*
- *Placentia-Yorba Linda System, Drought Tolerant Landscaping*
- *Claremont System, Drought Tolerant Landscaping*
- *South Arcadia System, Drought Tolerant Landscaping*
- *Cordova System, 2025 Urban Water Management Plan*
- *Bay Point System, 2025 Urban Water Management Plan*
- *Orcutt System, 2025 Urban Water Management Plan*
- *Simi Valley System, 2025 Urban Water Management Plan*
- *Artesia System, 2025 Urban Water Management Plan*
- *Norwalk System, 2025 Urban Water Management Plan*
- *Bell-Bell Gardens System, 2025 Urban Water Management Plan*
- *Florence Graham System, 2025 Urban Water Management Plan*
- *Culver City System, 2025 Urban Water Management Plan*
- *Southwest System, 2025 Urban Water Management Plan*
- *West Orange System, 2025 Urban Water Management Plan*
- *Placentia - Yorba Linda System, 2025 Urban Water Management Plan*
- *Claremont System, 2025 Urban Water Management Plan*
- *San Dimas System, 2025 Urban Water Management Plan*
- *South Arcadia System, 2025 Urban Water Management Plan*
- *South San Gabriel System, 2025 Urban Water Management Plan*
- *Barstow System, 2025 Urban Water Management Plan*

#### **4. Providing safe and reliable service to all customers**

GSWC continues to invest to improve water reliability and to reduce water loss throughout our systems, including investments in environmental control facilities.

The following projects help improve reliability and reduce water loss:

- Pipeline Management Program (pipeline replacement in all Systems)
- Clearlake Systemwide SCADA Upgrade Design
- Lake Marie Systemwide SCADA Upgrade

- Sisquoc Systemwide SCADA Upgrade
- Tanglewood Systemwide SCADA Upgrade
- Nipomo Systemwide SCADA Upgrade
- Artesia Systemwide SCADA Upgrade
- Norwalk Systemwide SCADA Upgrade
- Bell Gardens Systemwide SCADA Upgrade
- Florence Graham Systemwide SCADA Upgrade
- Hollydale Systemwide SCADA Upgrade
- Willowbrook Systemwide SCADA Upgrade
- Culver City Systemwide SCADA Upgrade
- Southwest Systemwide SCADA Upgrade
- Claremont Systemwide SCADA Upgrade
- San Dimas Systemwide SCADA Upgrade
- South Arcadia Systemwide SCADA Upgrade
- South San Gabriel Systemwide SCADA Upgrade
- Clair Plant, PLC Upgrade (West Orange)
- Newport Plant, PLC Upgrade (Cowan Heights)

## 5. Ensuring water supply

We are focused on consistently improving our resiliency and water supply diversification through groundwater infrastructure improvements, which will help meet the needs of our communities with valuable local water supply and ensure that high quality groundwater supplies are available for future generations.

The following projects help improve resiliency and water supply diversification:

- Hill Street Plant, Replace Well No. 2 (Bay Point)
- South Bay Well No. 1, Well Improvements (Los Osos)
- Rosina Well No. 1, Well Improvements (Los Osos)
- Orcutt Well Plant, Replace Well No. 1 (Orcutt)
- Willowood Plant, Drill New Well (Tanglewood)
- Rural Well No. 5, Equip Well (Cypress Ridge)
- Cypress Ridge System, Nitrate Treatment Feasibility Study (Cypress Ridge)
- Roseton Plant, Replace Roseton Well No. 1 (Artesia)
- Florence Graham, Drill & Equip New Well
- Florence Graham, Land Acquisition to replace Goodyear Well 4
- Miramonte Plant, Chromium removal & treatment (Florence-Graham)
- 129th St. Plant, Well Site Pump-to-Waste Valve (Southwest)
- Dalton Plant, Replace Well No. 1 (Southwest)
- Compton-Doty Plant, Replace Well #1 (Southwest)
- Doty Plant, Expand Treatment Capacity for Compton-Doty (Southwest)
- Bradford Well #4 Discharge Transmission Main (Placentia-Yorba Linda)
- Montana Lane Plant, Montana Lane Well #1 (Claremont)
- Indian Hill North Plant, Install Nitrate Treatment (Claremont)
- Highway Plant, Replace Nitrate Treatment (San Dimas)

- *Bradshaw Plant, Bradshaw Wells 13 and 14 Electrical Upgrades (Barstow)*
- *Glen Rd Plant, Glen Road Well 2 Electrical Upgrades (Barstow)*
- *Arrowhead Plant, Well 2 Electrical Upgrades (Barstow)*
- *Bradshaw Plant, Expand Nitrate Treatment (Barstow)*
- *Elm Plant, Well 24 Electrical Upgrades (Morongo Del Norte)*
- *Bella Vista Plant, New Well - Phase 1 (Morongo Del Norte)*
- *Yeager Plant, New Well (Morongo Del Sur)*
- *Lucerne Valley System, New Well - Phase 1 (Lucerne Valley)*
- *Heath Creek Plant, Well 4 Treatment System Improvements (Wrightwood)*

## **6. Uninterrupted water supply**

Our objective to build increasingly resilient operations to meet customer service expectations is reflected in multiple projects, including implementation of backup power generation in several locations and renewable power generation to help best meet water supply demands during the summer months when the risk of extended electrical power outages is high. Additionally, our ongoing pipeline and tank management programs focus on the timely replacement of aged pipelines and tanks to mitigate the risk of service interruptions due to age related failures.

The following projects help achieve resiliency in operations and install critical backup power generation:

- *Pipeline Management Program (pipeline replacement in all Systems)*
- *Bay Point System, Ductile Iron Pipeline Condition Pilot Study*
- *Coloma WTP (Pyrites), Recoat Reservoir No. 4 (Cordova)*
- *Calle Cordoniz Plant, Recoat Reservoir (Los Osos)*
- *Orcutt Hill Plant, Recoat Reservoir No. 2 (Orcutt)*
- *La Serena Plant, Recoat Reservoir No.1 & 2 (Nipomo)*
- *Cypress Ridge Plant, Replace Reservoir No. 1 (Cypress Ridge)*
- *Budlong Plant, Recoat North Reservoir (Southwest)*
- *Budlong Plant, Recoat South Reservoir (Southwest)*
- *Chadron Plant, Replace Reservoir (Southwest)*
- *Gardena Heights Plant, Reservoir Improvements (Southwest)*
- *Wadsworth Plant, Reservoir Improvements (Southwest)*
- *Yukon Plant, Reservoir Improvements (Southwest)*
- *Upper O'Neil Plant, Re-construct Roadway to Upper O'Neil Reservoir Phase 1 (Claremont)*
- *Wayhill Plant, Replace East & West Wayhill Reservoirs (San Dimas)*
- *Mud Springs Plant, Reservoir and BPS Abandonment (San Dimas)*
- *Bear Valley Plant, South Reservoir Structural Upgrades and Recoat (Barstow)*
- *Agarita Plant, Agarita Reservoir Structural Upgrades and Recoat (Barstow)*
- *Holabird Plant, Replace East Raw Water Reservoir Liner (Calipatria)*
- *Holabird Plant, Replace West Raw Water Reservoir Liner (Calipatria)*
- *Holabird Plant, East Finished Water Reservoir Improvements (Calipatria)*



- *Holabird Plant, West Finished Water Reservoir Improvements (Calipatria)*
- *Government Canyon Plant, South Reservoir Structural Upgrades and Recoat (Wrightwood)*
- *Acorn Plant, Construct 0.2 MG Reservoir (Wrightwood)*
- *Hawaiian Plant, Backwash Tanks Recoat and Improvement (Artesia)*
- *Roseton Plant, Backwash Tanks Recoat and Improvement (Artesia)*
- *Century Plant - Replace plastic backwash tank with bolted steel tank (Hollydale)*
- *Doty Plant, Recoat Backwash Tank A (Southwest)*
- *Doty Plant, Recoat Backwash Tank B (Southwest)*
- *Goldmedal Plant, Recoat Backwash Tank (Southwest)*
- *Southern Plant, Recoat Backwash Tank (Southwest)*
- *Timberline Plant, Install Production Meter, Permanent Generator, Replace Hydropneumatic Tank (Cowan Heights)*
- *Larkridge Plant, Larkridge Plant, Remove BPS & Pump Building, Relocate Hydropneumatic Tank (Placentia-Yorba Linda)*
- *Folsom South Canal, Install Back-up Generator (Cordova)*
- *Pyrites WTP, Install Back-up Generator (Cordova)*
- *Centralia Plant, Install Back-up Generator (Artesia)*
- *Imperial Plant, Install Back-up Generator (Norwalk)*
- *Bissell Plant, Install Back-up Generator (Bell-Bell Gardens)*
- *Miramonte Plant, Install Back-up Generator (Florence-Graham)*
- *McKinley Plant, Install Back-up Generator (Hollydale)*
- *Systemwide, Install Back-up Generators in various plant sites (Southwest)*
- *Timberline Plant, Install Production Meter, Permanent Generator, Replace Hydropneumatic Tank (Cowan Heights)*
- *South San Gabriel System, Install Genset to Garvey, San Gabriel, and Saxon Plant Sites*
- *Barstow System, Install Back-up Generators - Phase 1*
- *Lake Marie Plant, Replace Booster Station*
- *Gardena Heights Plant, Upgrade Booster Station (Southwest)*
- *Fox Run Plant, Booster Pump Station Upgrades (Cowan Heights)*
- *Kimberwicke Plant, Relocate Booster Pump Station (Cowan Heights)*
- *Concerto Plant, Booster Station Building & Purchase Portable Pump (Placentia-Yorba Linda)*
- *Walnut Booster Station, Replace Vault (San Dimas)*
- *Travis Dr, Replace Check Valve with PRV (Los Osos)*
- *El Campo Rd, Replace NC Valve with PRV (Cypress Ridge)*
- *Oriole and Acorn Zones, Construct New PRV Station (Wrightwood)*
- *Pinon Mesa West Zone, Upsize PRV Station 14 (Wrightwood)*

## **7. Public safety**

Numerous public safety projects are a focus for the company, including our commitment to site remediation (reducing the risk of groundwater contamination

and protecting aboveground water infrastructure from damage due to wildfires), the deployment of “smart” water tools such as water quality analyzers (alerting water operators to unusual system activity in a timely manner), and water main flushing (improving water quality with reduced water loss).

The following projects help improve public safety and aid in providing uninterrupted water supply:

- Pipeline Management Program (pipeline replacement in all Systems)
- Los Osos System, Fire Hardening Improvements
- Cypress Ridge System, Fire Hardening Improvements
- Simi Valley System, Fire Hardening Improvements
- *Chadron Plant - Site Remediation (Southwest)*
- Los Osos System, Chlorine Analyzers
- Nipomo System, Chlorine Analyzers
- *West Orange System, Chlorine Analyzers*
- Cowan Heights System, Chlorine Analyzers
- *Placentia-Yorba Linda System, Chlorine Analyzers*
- *Claremont System, Chlorine Analyzers*
- San Dimas System, Chlorine Analyzers
- New emergency interconnection (Culver City)
- *Systemwide, Installation of Distribution Valves and FH for NO-DES Flushing (Southwest)*

## **8. Supplier diversity**

Golden State Water’s spending with diverse suppliers increased to 33.7% in 2022, exceeding the CPUC’s target of 22.0% for the tenth consecutive year.

## **9. Engaging with our communities**

GSWC continues to emphasize community engagement and were grateful to see the increase in live events for 2022. We were able to double our community service hours at GSWC. Continuing the successful utilization of social media platforms, online venues and meetings developed during the pandemic, we continued to engage customers and community leaders in these expanded venues. We have also consistently made charitable contributions to non-profit organizations.

## **10. Diversity & Inclusion**

GSWC seeks to promote the benefits of diversity in all of our business activities and oppose discrimination of any kind with a nondiscrimination policy and Diversity & Inclusion Policy.

## **11. Affordable access to water**

GSWC is committed to balancing the goal of providing the highest quality and reliability of water service with the overall cost of service to our customers, subject to applicable federal and state laws and regulations, and orders of regulatory



bodies. The Board of Directors has adopted a policy of providing access to safe, clean and affordable water adequate for human consumption, cooking, and sanitary purposes in all states in which we operate.

## **12. Low-income or disadvantaged assistance programs**

At GSWC, we offer customer assistance programs to help low-income or disadvantaged households pay for water services, as well as protection for qualified military personnel during periods of full-time deployment. We also offer payment plans to our customers, giving them options to make smaller payments on outstanding bills without incurring penalties. We continue to promote participation in the Low Income Household Water Assistance Program (LIHWAP). In 2022, we also received \$9.5M from the California Water and Wastewater Arrearage Program (CWWAPP) and applied the funds to COVID related past due balances to approximately 19,000 accounts.

## **13. Providing economic benefits to low-income and disadvantaged communities**

Through our investments in capital infrastructure, as well as ongoing operations, GSWC generates significant economic benefits to the local and regional economies where we do business. GSWC employs over 500 employees in the state, providing jobs as well as the indirect economic effects that result.

## **14. Water quality for all customers**

GSWC ensures our customers receive quality water that they consume and use on a daily basis. That is our focus and we've devoted significant resources to do so. High quality water is essential to our customer's health and the trust they place in us as their water provider.

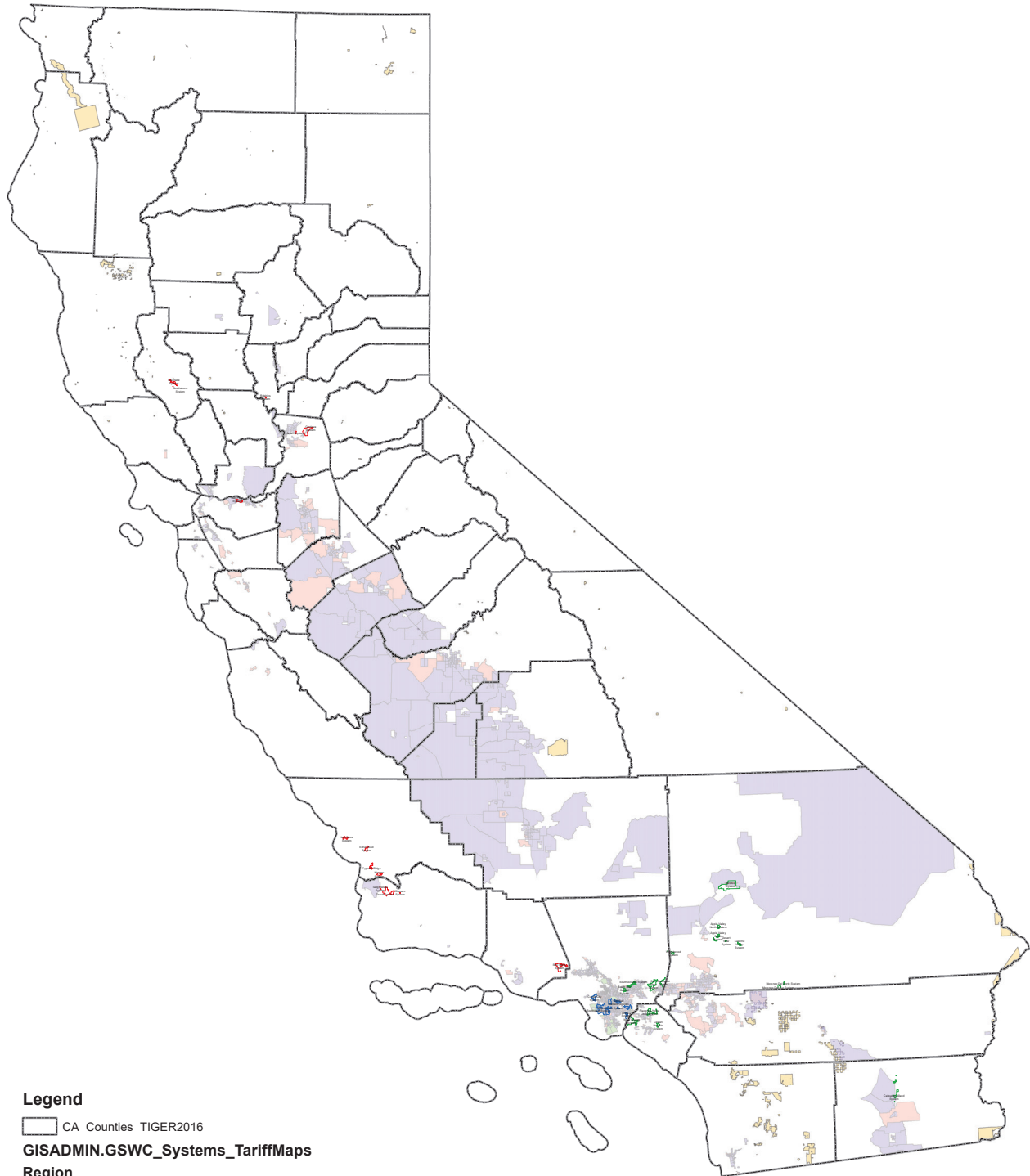
The following projects help ensure the delivery of high-quality water to all GSWC customers:

- Pipeline Management Program (pipeline replacement in all Systems)
- *Hill Street Plant, Replace Well No. 2 (Bay Point)*
- South Bay Well No. 1, Well Improvements (Los Osos)
- Rosina Well No. 1, Well Improvements (Los Osos)
- Orcutt Well Plant, Replace Well No. 1 (Orcutt)
- *Willowood Plant, Drill New Well (Tanglewood)*
- Rural Well No. 5, Equip Well (Cypress Ridge)
- Cypress Ridge System, Nitrate Treatment Feasibility Study (Cypress Ridge)
- *Roseton Plant, Replace Roseton Well No. 1 (Artesia)*
- *Florence Graham, Drill & Equip New Well*
- *Florence Graham, Land Acquisition to replace Goodyear Well 4*
- *Miramonte Plant, Chromium removal & treatment (Florence-Graham)*
- *129th St. Plant, Well Site Pump-to-Waste Valve (Southwest)*
- *Dalton Plant, Replace Well No. 1 (Southwest)*
- *Compton-Doty Plant, Replace Well #1 (Southwest)*

- *Doty Plant, Expand Treatment Capacity for Compton-Doty (Southwest)*
- *Bradford Well #4 Discharge Transmission Main (Placentia-Yorba Linda)*
- *Montana Lane Plant, Montana Lane Well #1 (Claremont)*
- *Indian Hill North Plant, Install Nitrate Treatment (Claremont)*
- *Highway Plant, Replace Nitrate Treatment (San Dimas)*
- *Bradshaw Plant, Bradshaw Wells 13 and 14 Electrical Upgrades (Barstow)*
- *Glen Rd Plant, Glen Road Well 2 Electrical Upgrades (Barstow)*
- *Arrowhead Plant, Well 2 Electrical Upgrades (Barstow)*
- *Bradshaw Plant, Expand Nitrate Treatment (Barstow)*
- *Elm Plant, Well 24 Electrical Upgrades (Morongo Del Norte)*
- *Bella Vista Plant, New Well - Phase 1 (Morongo Del Norte)*
- *Yeager Plant, New Well (Morongo Del Sur)*
- *Lucerne Valley System, New Well - Phase 1 (Lucerne Valley)*
- *Heath Creek Plant, Well 4 Treatment System Improvements (Wrightwood)*
- *Coloma WTP, Replace Filter Media (N1, S1) (Cordova)*
- *Coloma WTP, Replace Filter Media (S3, S4) (Cordova)*
- *Pyrites WTP, Replace Filter Media (Filters 1 & 2) (Cordova)*
- *Sonoma WTP, Change-out GAC & Recoat Interior (Clearlake)*
- *Artesia System, Replace Filter Media*
- *Bissell Plant, Replace Filter Media (Bell-Bell Gardens)*
- *Century Plant, Replace Filter Media (Hollydale)*
- *Southwest System, Replace Filter Media*
- *Bloomfield Plant, Filter Media Replacement (West Orange)*
- *Cherry Plant, Filter Media Replacement (West Orange)*
- *Fairhaven Plant, Filter Media Replacement (Cowan Heights)*
- *Bradford Plant, Filter Media Replacement (Placentia-Yorba Linda)*
- *La Jolla Plant, Filter Media Replacement (Placentia-Yorba Linda)*
- *Margarita Plant, Filter Media Replacement (Claremont)*
- *Garvey Plant, Filter Media Replacement (South San Gabriel)*

**END OF RESPONSE**

# Disadvantaged Communities (as designated by CalEPA for the purpose of SB535)



### Legend

CA\_Counties\_TIGER2016

GISADMIN.GSWC\_Systems\_TariffMaps

### Region

Region 1

Region 2

Region 3

### SB535tracts2022

### DAC category

CalEnviroScreen 3.0 Disadvantaged Communities Only

CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count

CalEnviroScreen 4.0 Top 25%

CA\_tribal\_boundaries

# **Attachment 3-1: Robbins Maintenance and Consulting Expenses**



September 20, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-002 (A.23-08-010)  
Due Date: September 20, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

### **CONSULTATION EXPENSES**

#### **Question 1:**

Refer to SEC-40\_EXP\_OM AG Standard.xlsx, Tab WS-01 EXP row 43, Object Account 7131-Consulting Services. Provide an itemized breakdown of “consultation fees” for years 2018 – 2021.

- a) How does GSWC define consulting services and fees.
- b) Please describe in detail the type of consulting services as referenced in SEC-40\_EXP\_OM AG Standard.xlsx, Tab WS-01 Exp Rep row 43, Object Account 7131-consulting fees.
- c) Refer to SEC-40\_EXP\_OM AG Standard.xlsx, Tab WS-01 Exp row 43, Object Account 7131-Consulting fees. Provide an itemized breakdown of the \$26,303 (year 2019) consulting fee expense.
- d) Please provide the consulting agency used since acquisition, specifying the type of consultants or consulting services engaged and the corresponding costs from 2018 – 2023. Please provide supporting documentation for each cost referencing relevant page numbers.
- e) Was there a bidding process for the selected consultation agency? If not, please explain how GSWC selected the specific consulting firm or professionals for the job

and the criteria used in the selection process. If yes, provide the related bidding documents.

- f) Explain in detail the rationale that influenced the choice to hire external consultants and advisory services.

**Response 1:**

As clarified by Cal Advocates, on 9/14/2023, GSWC’s responses are specific to the Robbins system only.

- a) Account 7131- Consulting Services is defined as follows: This account shall include the fees of professional consultants and others for general services which are applicable to utility operations and that are not capitalized. It shall also include the pay and expenses of persons engaged for a special or temporary administrative or general purpose in circumstances where the person so engaged is not considered as an employee of the utility (e.g.; fees of appraisers, attorneys, engineering consultants, management consultants, negotiators, public relations counsel, supervision fees paid under contracts for general management services, surveys and reports).
- b) None. The reference row, which is for Other Operations (WUDF 781) consulting services includes no services provided to the Robbins System
- c) Please note that the \$26,303 are not for the Robbins System, which GSWC acquired in 2022.

Vendor	BU	Amount	Description of Service
CITY OF SACRAMENTO	116	2,603	American River Watershed Sanitary Survey 2018
REGIONAL WATER AUTHORITY	117	3,700	Regional Aquifer Storage and Recovery Information Project
REGIONAL WATER AUTHORITY	118	20,000	Sacramento Regional Water Bank, Phase 1

- d) N/A
- e) N/A

**Question 2:**

Please list all consultants and advisory services used from May 1, 2022 to August 31, 2023 for ongoing operation and improvements to the Robbins System. Provide the following along with supporting documentation:

- a) Start and end date
- b) Contract Renewal/ Extension
- c) Detail of consulting services provided
- d) Total cost of consulting

**Response 2:**

No such services were used during this time period.

- a) N/A
- b) N/A
- c) N/A
- d) N/A

**REPAIR EXPENSES**

**Question 3:**

Please refer to Gomez Testimony Expenses- APP Sheet.pdf lines 1-5.

- a. In an Excel sheet, provide an overview of the repairs and costs incurred by GSWC since Robbins Acquisition from May 1, 2022 to August 31, 2023, broken down by categories such as leak repair, meter repair, maintenance, and improvements, and provide the related supporting documents such as copies of invoices paid, etc.

**Response 3:**

- a) Data provided are maintenance expenses (WUDF 787 & 788) including labor & benefits, planned maintenance, unplanned maintenance, vehicle expenses, equipment expenses, permits, M&S tools. See related “Q3” PDF attachments to support payments to outside vendors for non-labor items included in the amounts below.

Category	Amount
Mains	\$ 12,706
PP - Pump	\$ 7,012
WT - Structures	\$ 4,001
PP - Other	\$ 3,300
WT - Chem	\$ 3,079
PP - Booster	\$ 674
WT - Other	\$ 247
Meters	\$ 139
Intakes	\$ 48
Hydrants	\$ 33
<b>Total</b>	<b>\$ 31,237</b>

**Question 4:**

Did GSWC conduct a leak survey for Robbins System from July 1, 2022 to July 31, 2023? If yes, provide the related documents and results of leak surveys. If no surveys were conducted for these years, please explain if GSWC forecasts to conduct additional leak surveys for years 2023-2027.

**Response 4:**

Yes. Leak surveys were conducted in October 2022 and May 2023. American Leak Detection invoices are provided in response to question 3. See also attached “**Q4 Leak Survey Report\_May 2023**”.

**Question 5:**

How many customers/connections are being serviced as part of the Robbins System as of August 31, 2023?

**Response 5:**

94

**Question 6:**

As a result of Robbin's Acquisition, provide the following information.

- a. The initial number of meters before the acquisition
- b) New meters that were installed from May 1, 2022 to August 31, 2023.
- c) How often are new meters installed.
- d) Quantity of broken meters from the acquisition date to August 31, 2023.
- e) Explain in detail GSWC's definition of a broken meter.
- f) Provide the frequency of meter repairs in the Robbins System to date.

**Response 6:**

- a) 95
- b) 0
- c) N/A
- d) 0
- e) A meter that no longer registers within CPUC standards or a meter that is unable to obtain a read.
- f) No meter repairs from May 1, 2022 to August 31, 2023.

**Question 7:**

In an Excel sheet, provide a list of all repair services provided in Robbins System and the Wagner well. Identify the assets involved and provide the details of the services provided from May 1, 2020 to August 31, 2023.

**Response 7:**

Refer to attached Excel files “**Q7 119 - Robbins corner of Pepper and San Francisco**” and “**Q7 119 - Robbins Del Monte 4895 Emergency Valve and hydrant replacement.**”



**Question 8:**

In reference to 1860-w\_notice\_robbins\_tax\_account.pdf, answer the following question.

- a) Does GSWC still charge connections at flat rate anywhere in the Robbins system?  
If not, when did GSWC transition from charging a flat rate to a metered rate?

**Response 8:**

No. All customers are on AC-1 R as of July 2023.

**OPERATING EXPENSES**

**Question 9:**

Please provide the type and amount of operating expenses GSWC has incurred in the Robbins system since the Robbins Acquisition from May 1, 2022 to August 31, 2023

**Response 9:**

<b>Expense Category</b>	<b>Amount</b>
Operation Labor	\$ 67,114
Vehicle Expenses (Company)	\$ 51,933
Equipment - Other	\$ 11,617
WQ-Chemicals and Lab	\$ 4,885
M&S, Tools	\$ 785
Telecommunication	\$ 417
Equipment Expenses (Company)	\$ 410
System Fees	\$ 333
Media Changeout	\$ 321
<b>Total</b>	<b>\$ 137,814</b>

**END OF RESPONSE**



American Leak Detection, Inc. (Municipal)  
 199 Whitney Avenue  
 New Haven, CT 06511  
 2034332507  
 mhartz@americanleakdetection.com  
 www.americanleakdetection.com

# Invoice MUN-1205CM

DATE 05/31/2023	PLEASE PAY <b>\$1,465.00</b>	DUE DATE 06/30/2023
--------------------	---------------------------------	------------------------

**BILL TO**  
 Michele Curtis  
 Golden State Water  
 630 E Foothill Blvd  
 San Dimas, CA 91773

**SHIP TO**  
 Robbins System  
 3005 Gold Canal Drive  
 Rancho Cordova CA 95670

PLEASE DETACH TOP PORTION AND RETURN WITH YOUR PAYMENT.

SHIP VIA	TRACKING NO.	TECH	START DATE	COMPLETION DATE
Brett Nocentini	PO #7036995	Mike Miller	5/19/2023	5/19/2023

ACTIVITY	QTY	RATE	AMOUNT
MUN DET:Municipal Correlator / Leak Survey - See report for details	1	1,465.00	1,465.00

<b>TOTAL DUE</b>	<b>\$1,465.00</b>
------------------	-------------------

THANK YOU.

A-118

Thank you for allowing American Leak Detection to be of service. We look forward to working with you again.

REMIT PAYMENT TO: American Leak Detection, Inc., 199 Whitney Avenue, New Haven, CT 06511

# Leak Survey Report

**Golden State Water  
Robins System  
PO 7036995**

**May 19<sup>th</sup>, 2023**

**American Leak Detection**

**Jimmy Carter, Sr. Dir. of Field Operations**

**Corporate Office  
199 Whitney Ave New Haven CT. 06511  
And  
77551 El Duna Ct Palm Desert Ca 92211**

**760-320-9991 or 760-408-4835  
[jcarter@americanleakdetection.com](mailto:jcarter@americanleakdetection.com)**

## Scope of Work

American Leak Detection (ALD) undertook a leak survey of Robins System. The following report contains the results of the leak survey.

The techniques used during the leak detection survey (where appropriate) may have included

- Leak Noise Correlation
- Open Sounding
- Surface Sounding

The equipment used to perform the work (where appropriate) may have included

- Leak Noise Correlator using Accelerometers
- Ground Microphone
- Electronic Listening Probe
- Metal Detector
- Pipe Tracer Kit
- Assorted hand tools

### Leak Summary

<b>Total Leaks Found</b>	<b>Mains Leaks</b>	<b>Service Line Leaks</b>	<b>Hydrant Leaks</b>	<b>Meter Leaks</b>	<b>Customer Leaks</b>
0	0	0	0	0	0

Following our recent comprehensive survey of the distribution network at Robins System, we would like to advise that no leaks were located. This would indicate the network is in good serviceable condition with no known defects.

## Technician Notes

Ending this survey with no leaks detected. If you have any questions, please feel free to reach me by phone or email.

**Mike Miller**  
**Bakersfield CA**  
**661-203-0869**  
[Mmiller1@americanleak.com](mailto:Mmiller1@americanleak.com)

**Thank you for entrusting American Leak Detection to complete this work for you. If you have any questions or concerns related to the work performed or this invoice/report, please don't hesitate to contact our office**



American Leak Detection, Inc. (Municipal)  
199 Whitney Avenue  
New Haven, CT 06511  
2034332507  
mhartz@americanleakdetection.com  
www.americanleakdetection.com

# Invoice MUN-1176

DATE 10/14/2022	PLEASE PAY <b>\$4,815.00</b>	DUE DATE 11/13/2022
--------------------	---------------------------------	------------------------

**BILL TO**  
3005 Gold Canal  
630 E Foothill Blvd  
San Dimas, CA 91773

**SHIP TO**  
3005 Gold Canal  
3005 Gold Canal Drive Rancho  
CORDOVA, CA 95670

PLEASE DETACH TOP PORTION AND RETURN WITH YOUR PAYMENT.

---

<b>SHIP VIA</b> Brett Nocentini	<b>TRACKING NO.</b> 7030681 – SP	<b>START DATE</b> 10/10/2022	<b>COMPLETION DATE</b> 10/10/2022
------------------------------------	-------------------------------------	---------------------------------	--------------------------------------

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ACTIVITY	QTY	RATE	AMOUNT
<b>MUN DET:Municipal Correlator / Leak Survey -</b> See report for details	1	4,815.00	4,815.00

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<b>TOTAL DUE</b>	<b>\$4,815.00</b>
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THANK YOU.

Thank you for allowing American Leak Detection to be of service. We look forward to working with you again.

REMIT PAYMENT TO: American Leak Detection, Inc., 199 Whitney Avenue, New Haven, CT 06511

Federal ID# 33-0106141



**TRAKiT**  
 Sutter County, CA  
 1130 Civic Center Blvd  
 Yuba City, CA 95993

**INVOICE #**  
**INV-134**  
**Date Due: 6/2/2022**

Brett Nocentini (Golden State Water Company)  
 3005 Gold Canal Drive  
 Rancho Cordova, CA 95670

**Invoice Date: 5/3/2022**

Record #	Record Type	Fee Group	Fee Description	Quantity	Amount
EP2022-0042	ENCROACHMENT PERMIT	ENCROACHMENT ANNUAL SUPPLEMENTAL	ENGINEERING ENCROACHMENT	0	\$1,946.00
					<b>\$1,946.00</b>

**Invoice Total: \$1,946.00**

Please send your payment to this address: Development Services  
 1130 Civic Center Blvd  
 Yuba City, CA 95993

A-124



# Leak Survey Report

**Golden State Water  
Robins System  
PO 7036995**

**May 19<sup>th</sup>, 2023**

**American Leak Detection**

**Jimmy Carter, Sr. Dir. of Field Operations**

**Corporate Office  
199 Whitney Ave New Haven CT. 06511  
And  
77551 El Duna Ct Palm Desert Ca 92211**

**760-320-9991 or 760-408-4835  
[jcarter@americanleakdetection.com](mailto:jcarter@americanleakdetection.com)**

## Scope of Work

American Leak Detection (ALD) undertook a leak survey of Robins System. The following report contains the results of the leak survey.

The techniques used during the leak detection survey (where appropriate) may have included

- Leak Noise Correlation
- Open Sounding
- Surface Sounding

The equipment used to perform the work (where appropriate) may have included

- Leak Noise Correlator using Accelerometers
- Ground Microphone
- Electronic Listening Probe
- Metal Detector
- Pipe Tracer Kit
- Assorted hand tools

### Leak Summary

<b>Total Leaks Found</b>	<b>Mains Leaks</b>	<b>Service Line Leaks</b>	<b>Hydrant Leaks</b>	<b>Meter Leaks</b>	<b>Customer Leaks</b>
0	0	0	0	0	0

Following our recent comprehensive survey of the distribution network at Robins System, we would like to advise that no leaks were located. This would indicate the network is in good serviceable condition with no known defects.

## Technician Notes

Ending this survey with no leaks detected. If you have any questions, please feel free to reach me by phone or email.

**Mike Miller**  
**Bakersfield CA**  
**661-203-0869**  
[Mmiller1@americanleak.com](mailto:Mmiller1@americanleak.com)

**Thank you for entrusting American Leak Detection to complete this work for you. If you have any questions or concerns related to the work performed or this invoice/report, please don't hesitate to contact our office**



October 25, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-003 (A.23-08-010)  
Due Date: October 19, 2023      Extension Due Date: October 26, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

Please refer to Gomez Testimony Expenses-APP Sheet.pdf, page 14, lines 1-5 for the following questions.

- a. In an Excel sheet, provide the calculations and inputs showing how GSWC calculated the estimates of additional \$18,706 for Arden Cordova's Maintenance Expenses.

**Response 1:**

- a. See ["SRA-003 - Response 1 - AC Maintenance"](#). Please refer to ["LCN-001 O&M Expenses Partial Response 2"](#) for more details on this adjustment.

**Question 2:**

Please refer to your earlier response to LCN-002, Question 6(a). Per GSWC "As acquisitions can be sporadic from a business perspective, they continue to be essential for some communities to receive quality service. These most recent consulting fees are a result of both the acquisition, as well as ongoing expenses for participation in the Regional Water Authority (RWA). This adjustment was used to bring the forecasted expenses more in line with recent annual costs".

- a. How often does GSWC pay participation fees to the RWA? Please provide supporting documentation, including invoices, for all expenses paid to RWA from the 2019-2023.
- b. Explain what GSWC means in the above quoted sentence with regard to “participation in the Regional Water Authority.” How does GSWC participate in the RWA and what purpose does this participation serve? Provide copies of all agreements between GSWC and the RWA.
- c. Please provide estimated expenses for the next three years (2025-2027) related to participation in the RWA in Arden Cordova and explain how these expenses relate to the Robbins System. Please provide all documents supporting your estimates.

**Response 2:**

- a. See listing of RWA invoices in “SRA – 003 – Response 2 – RWA Invoices”. Due to the volume of invoices, we have provided a list in excel and sample invoices can be provided upon request.
- b. The Regional Water Authority aims to align interests of regional water providers and stakeholders for the purpose of improving water supply reliability, availability, quality and affordability. By collaborating with several other regional water agencies, providers are able to solve complex issues through its unified approach. More information on RWA can be found at the following website: <https://rwah2o.org/>. Agreements dated back to 2019 are submitted with this response under “SRA-003 - Response 2 - RWA - CIMS Agreement”, “SRA-003 - Response 2 - RWA - Major Projects Agreement”, and “SRA-003 - Response 2 - RWA - Water Resilience Program”.
- c. These RWA expenses do not directly relate to the Robbins system. Projections for these expenses are expected to follow the current trend of a 5 year average adjusted for inflation. The additional \$8,500 adjustment requested has been calculated in “LCN-002 – Response 6 – Arden Consulting”. This adjustment was used in order to bring the forecasted expense more in line with recent annual costs.

**Question 3:**

Referring to SRA-002 response to Question 3, GSWC spent \$31,237 from May 1, 2022 to August 31, 2023, towards maintenance expenses for the Robbins System. Please answer the following questions.

- a. Identify which maintenance expenses identified in response to SRA-002, Question 3, are considered recurring in nature and their frequency per year.
- b. Provide details of activities and repairs performed for \$12,706 under Mains.
- c. Provide detail of activities and repairs performed for \$7,012 under PP-Pump.
- d. Provide details of activities and repairs performed for \$4,001 under WT-Structure.
- e. Provide details of activities and repairs performed for \$3,300 under PP-Other.
- f. Provide details of activities and repairs performed for \$3,079 under WT-Chem.

**Response 3:**

- a. See responses 3b to 3f.
- b. The Mains related maintenance includes recurring charges for maintenance to hydrants, valves, meters and leak repairs as needed. These expenses also include fees for leak detection services and encroachment permits.
- c. Pump maintenance is related to annual charges for pump and motor testing. This also includes recurring charges for general maintenance to pumps to ensure adequate system pressures being met.
- d. Structure maintenance expense relates to the recurring charges for recoating, exterior corrosion control and cleanings.
- e. The Other expenses relate to routine minor maintenance items that would not be classified in any of the other categories.
- f. These Chemical expenses relate to the ongoing maintenance to the chemical injection point, chemical feed lines, chemical pumps and chemicals for water treatment disinfection.

**END OF RESPONSE**



August 28, 2023

Lauren Cunningham, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request LCN-002 (A.23-08-010) A&G Expenses  
Due Date: August 28, 2023

Dear Lauren Cunningham,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

**Additional Cellular Services (All Regions):**

Please refer to Gomez Testimony Expenses – PA.pdf, PDF page 20, lines 4-10 and RO Workpaper Y\_SEC-40\_EXP\_FDR Adjustments, tab “OUT\_Forecasted Adj,” Cells: L25-28, L41-42, L50, L57 and L59. Please provide the following answer in Excel format and with clickable formulas:

- a. Did GSWC account for Labor Overtime Hours, Vehicle Expense, Travel and Entertainment (T&E) Expense, and other related costs savings in the RO Model to reflect “allow[ing] the acquisition of data from remote locations where historically, operators and engineers would be forced to travel in order to read meter levels” and “allow[ing] [GSWC’s] SCADA technology to optimally analyze real-time data and monitor equipment” as a result of new cellular services?
  - i. If so, please provide a detailed breakdown of any and all such cost savings, and indicate where these savings have been reflected in the RO Model.
- b. A detailed breakdown of each cellular service cost adjustment in each applicable CSA, including supporting documentation including page references for each cost.

**Response 1:**

- a. There are no cost savings in labor due to the headcount being the same, as this would not eliminate any positions. There would also be no cost savings in Overtime,



as that is traditionally only used when there are call outs (i.e. emergencies at night) or any staff shortages. While vehicle expenses may decrease, the time spent historically going out for these meter readings, would allow field employees to focus on other items, which would also have them using their vehicle.

- b. Examples provided for the various service companies represent the service and usage increase that is present in all districts. By comparing the 2018 invoices to the 2022, the itemized call log represents usage more than doubling (See for example, itemized call log on Pg.1 of “LCN-002 - Response 1 - New Cellular - Calipatria 2018” and Pg.1 of “LCN-002 - Response 1 - New Cellular - Calipatria 2022”. Along with this higher usage, these service providers’ pricing on cellular service does not increase in line with the CPUC inflation escalation factors that are included within the RO model. Using just a five year historical average would not be indicative of the expected increase in future costs. In order to forecast, we have adjusted these expenses to align with what the most recent annual expense has been in order to forecast the anticipated test year expenses. See examples for both Verizon and AT&T invoices.

**Question 2:**

**Ethernet Services Upgrades (Santa Maria, Simi Valley, and Region 3 RMAs):**

Please refer to Gomez Testimony Expenses – PA.pdf, PDF page 20, lines 12-18 and RO Workpaper Y\_SEC-40\_EXP\_FDR Adjustments, tab “OUT\_Forecasted Adj,” Cells: L16, L19-20, and L29-30.

- a. Please explain GSWC’s technology initiatives as they relate to the proposed Ethernet service upgrades.
- b. In Excel format and with clickable formulas, please provide a detailed breakdown of the Ethernet service upgrade cost adjustment in each applicable CSA, including supporting documentation with page references for each cost.

**Response 2:**

- a. These expenses are related to bandwidth upgrades to support the migration to cloud based storage. Golden State Water has adopted Microsoft 365 and its applications in order to collaborate more effectively. Due to previously not having a cloud storage like system, upgrades were needed at these CSAs. See Lumen (FKA CenturyLink) invoices for support on significant increases due to upgrades.
- b. See excel workbook “LCN-002 - Response 2 – Ethernet” for calculation on the approximate adjustment figure and cloud migration invoices to display significant increase.

**Question 3:**

**Office Expense Normalization (Arden Cordova and Orange County District (Region 3)):**

Please refer to Gomez Testimony Expenses – PA.pdf, PDF page 20, lines 20-26 and RO Workpaper Y\_SEC-40\_EXP\_FDR Adjustments, tab “OUT\_Forecasted Adj,” Cells: L32-34 and L53.

- a. What year did GSWC’s office staff<sup>2</sup> return to work at the office?
  - i. Have 100% of GSWC’s pre-2020 office staff returned to full-time work at the office since the year specified above? And have 100% of GSWC’s pre-2020 office staff continued to work full-time at the office for every year since? Please provide supporting documentation.
  - ii. If not, what percentage of GSWC’s pre-2020 office staff returned to fulltime work at the office in the aforementioned year and in the years since then?
  - iii. Of the employees working in the office, please provide a table demonstrating what percentage of their full-time schedule is worked in the office.
- b. Please fill out the following table regarding what percentage of GSWC employees’ full-time (8 work hours) work schedules are performed in-office:

% of Work Performed In-Office	1-25%	26-50%	51-75%	76-100%
# of GSWC Employes				
% of GSWC Employees				

- c. Please fill out the following table regarding GSWC’s office employees in each CSA and RMA.

CSA/RMA	# of Office Employees

- d. Please explain how the following adjustments were derived:
  - i. \$14,500 positive adjustment in Orange Country District
  - ii. \$8,000 positive adjustment in Arden Cordova.

---

<sup>2</sup> Office employees are defined as employees who have the ability to complete 100% of their workload in-office and are not primarily field based.

**Response 3:**

- a. GSWC office-based managers and supervisors returned to the office on a hybrid schedule in April 2022. All other office-based staff returned on a hybrid schedule in May 2022.
  - i. No.
  - ii. GSWC operates a hybrid schedule for its office-based staff. Office-based employees work 50% of the time in the office.
  - iii. See response to ii.
- b. See response to 3.a.ii.

% of Work Performed In-Office	1-25%	26-50%	51-75%	76-100%
# of GSWC Employees		311		
% of GSWC Employees		63%		

- c. Please fill out the following table regarding GSWC’s office employees in each CSA and RMA.

CSA/RMA	# of Office Employees
Arden Cordova	21
OC District	13

- d. See below.
  - i. Due to there being two full years of remote and hybrid work schedules, we have used the pre-pandemic year of 2019 as the benchmark for what the adjusted forecast should be.
  - ii. Due to there being two full years of remote and hybrid work schedules, we have used the pre-pandemic year of 2019 as the benchmark for what the adjusted forecast should be.

**Question 4:**

**New Waste Collection Regulations (Arden Cordova):**

Please refer to Gomez Testimony Expenses – PA.pdf, PDF page 21, lines 1-4 and RO Workpaper Y\_SEC-40\_EXP\_FDR Adjustments, tab “OUT\_Forecasted Adj,” Cell L54.

Please provide the following answers in Excel format and with clickable formulas:

- a. A detailed breakdown of the additional \$4,300 including supporting documentation with page number references for each cost.
- b. A detailed breakdown of Arden Cordova’s total Proposed 2025 Test Year Utilities Garbage Service expense including supporting documentation with page number references for each cost.

- c. Please fill out the following table for each of the costs from the answers to the questions above.

Cost Name	Cost Amount	Senate Bill 1383 Regulation	Explanation of How Cost Fulfills Regulation

**Response 4:**

- a. See related excel workbook for calculation on approximate adjustment.
- b. See related excel workbook for calculation on approximate adjustment. Supporting documentation invoices can be found on pg. 1 of both “LCN-002 – Response 4 – Garbage -2022 WM” and “LCN-002 – Response 4 – Garbage -2020 WM” files.
- c.

Cost Name	Cost Amount	Senate Bill 1383 Regulation	Explanation of How Cost Fulfills Regulation
Utilities Garbage Service	\$8,091	California’s Short-Lived Climate Pollutant Reduction Strategy	SB 1383 requires businesses to establish minimum service levels for landfill, recycling and organics collection.

**Question 5:**

**SCADA Equipment (All RMAs):**

Please refer to Gomez Testimony Expenses – PA.pdf, PDF page 21, lines 6-10 and RO Workpaper Y\_SEC-40\_EXP\_FDR Adjustments, tab “OUT\_Forecasted Adj,” Cells: L89-107.

- a. In Excel format and with clickable formulas, please provide a detailed breakdown of each SCADA equipment cost for each RMA as they specifically relate to the aforementioned cells.

**Response 5:**

Please see excel workbook “LCN-002 – Response 5”.

**Question 6:**

**Consulting Fees (Arden Cordova):**

Please refer to Gomez Testimony Expenses – PA.pdf, PDF page 22 (lines 26-28) and page 23 (lines 1-3) and RO Workpaper Y\_SEC-40\_EXP\_FDR Adjustments, tab “OUT\_Forecasted Adj,” Cell: L55.

- a. In Excel format and with clickable formulas, please provide a detailed breakdown of the additional consulting fees, including their purpose related to Robbins System and supporting documentation with page reference numbers for each cost.

**Response 6:**

- a. As acquisitions can be sporadic from a business perspective, they continue to be essential for some communities in order to receive quality service. These most recent consulting fees are a result of both the acquisition, as well as, ongoing expenses for participation in the Regional Water Authority (RWA). This adjustment was used in order to bring the forecasted expense more in line with recent annual costs. See supporting documentation “LCN-002 - Response 6 - Consulting - Arden 2023” that displays recurring annual payments beginning in 2022.

**Question 7:**

**Expense Normalization (Los Osos):**

Please refer to Gomez Testimony Expenses – PA.pdf, PDF page 25, lines 12-15 and RO Workpaper Y\_SEC-40\_EXP\_FDR Adjustments, tab “OUT\_Forecasted Adj,” Cell L63.

- a. In Excel format and with clickable formulas, please fill out the following table:

	2018	2019	2020	2021	2022	5-year Average	Proposed TY 2025
Cost Name							

- b. Please provide a detailed explanation of the “abnormal credit” that occurred in 2018.
- c. Please explain how the \$1,907 adjustment was derived.

**Response 7:**

- a. See excel file.
- b. This refund was from the State Water Resources Control Board for an over payment on Waste Discharge Annual permit fees paid in 2015. As the over payment is outside the 5 year span, this adjustment is needed.
- c. In order to be aligned with recent history of permit fees, we have taken the rough average of permit fees within Los Osos over the course of 2021 and 2022.

**END OF RESPONSE**

7 (e.g., facility rental for meetings and workshops, fees for conferences, loose leaf  
8 filings, armored transportation, and job advertising).  
9

10 (Q) Please describe the exceptions to the above mentioned methodology.

11 (A) After successful acquisition of the Robbins System, we have added expenses of  
12 \$8,500 to the inflation adjusted five year historical average for Arden Cordova RMA.  
13 We expect to continue to engage in consulting engagements to evaluate the existing  
14 systems where improvements can be made to ensure the system continues to be in  
15 good standing.  
16





17 / 73



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## PREPARED TESTIMONY OF MARCUS GOMEZ (Cont.)

- 1 (A) After the acquisition of the Robbins System in 2022 Golden State has added
- 2 expenses of \$18,706 to the Arden Cordova RMA inflation adjusted five year history.
- 3 With the new system, there is expected to be additional maintenance involved within
- 4 the water system as the year of acquisition there has already been an increase in leak
- 5 detection services and meter repair.
- 6

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Alignment: Left, Center, Right, Justify, Merge & Center

Number: General, Currency, Percentage, Fraction, Decimals, Thousands Separator, Negative Numbers, List Separator, Text Box, Text Direction, Text Orientation, Text Wrapping, Text Background Color, Text Color, Text Color Background Color, Text Color Background Color

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Editing: Autosum, Fill, Clear, Sort & Find & Filter, Select

Sensitivity: Add-ins

Comments: Create PDF, Share via Out, Adobe Acrobat

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V
1	Y_SEC40_EXP_FDR_Adjustments																					
2	OUT_Forecasted Adj																					
3																						
4	WUJDF Report	CSA Code	CSA Name	Description	Escalation	Customer	2023	2024	2025	2026	2027											
5		788	1001. Arden Cordova	Planned Maintenance	E1	E1	18,997	19,105	19,441	19,903	20,328											
6		798	1001. Arden Cordova	Consulting	E3	E1	8,880	9,277	9,691	10,124	10,576											
7																						
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A-140



**Arden Cordova Maintenance Adjustments ( Robbins)**

<b>CSA</b>	<b>Escalation Code</b>	<b>Customer Growth</b>	<b>2018</b>
Meter	E1	E1	43,759
Pump	E1	E1	20,350
Leak	E1	E1	15,310

				Escalated			
2019	2020	2021	2022	2018	2019	2020	2021
48,050	50,611	51,912	50,310	55,028	59,508	60,889	56,438
17,275	27,105	20,607	32,571	25,591	21,395	32,610	22,404
8,950	8,950	12,824	13,617	19,253	11,084	10,768	13,942

<b>2022</b>	<b>5 Year Escalated Average</b>	<b>GSWC Proposed Additional Adjustment</b>	<b>Cal Advocate Additional Adjustment</b>	<b>Adjusted Forecast</b>
50,310	56,435	4,000	139	60,435
32,571	26,914	5,076	5,076	31,990
13,617	13,733	9,630	1,465	23,363

<b>Cal Advocate Adjusted Forecast</b>	<b>2023</b>	<b>Cal Advocate Adjusted 2023</b>	<b>2024</b>	<b>Cal Advocate Adjusted 2024</b>	<b>2025</b>	<b>Cal Advocate Adjusted 2025</b>
56,574	61,375	61,375	61,725	61,725	62,809	62,809
31,990	32,487	32,487	32,673	32,673	33,247	33,247
15,198	23,726	23,726	23,861	23,861	24,280	24,280

Escalation Code	CSA Code	RMA Code	2017
E1	1001	Arden Cordova	0.0000
E2	1002	Bay Point	0.0000
E3	1003	Clearlake	0.0000
E4	1004	Los Osos	0.0000
E5	1005	Santa Maria	0.0000
E6	1006	Simi Valley	0.0000
E7	1025	Northern District	0.0000
E8	1026	Coastal District	0.0000
E9	1050	Region 1 Headquarters	0.0000
E10	2001	Central Basin-East	0.0000
E11	2002	Central Basin-West	0.0000
E12	2003	Culver City	0.0000
E13	2004	Southwest	0.0000
E14	2025	Central District	0.0000
E15	2026	Southwest District	0.0000
E16	2050	Region 2 Headquarters	0.0000
E17	3001	Los Alamitos	0
E18	3002	Placentia	0
E19	3003	Claremont	0
E20	3004	San Dimas	0
E21	3005	San Gabriel	0
E22	3006	Barstow	0
E23	3007	Calipatria	0
E24	3008	Morongo	0
E25	3009	Apple Valley	0
E26	3010	Wrightwood	0
E27	3025	Orange County District	0
E28	3026	Foothill District	0
E29	3027	Mountain District	0
E30	3050	Region 3 Headquarters	0
E31	9011	GO - Corporate Support	0
E32	9012	GO - Utility Support	0
E33	9013	GO - Central Operations	0
E34	1000	Region 1 - Coastal Consolidation	0
E35	1199	Region 1 - Northern District	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
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Escalation Code	Escalation Category	2017	2018	2019
E1	Composite Inflation	0.765945	0.795204	0.80745
E2	Labor Inflation Factor	0.886746	0.905368	0.927097
E3	CPI-U	0.830193	0.845966	0.865423
E4	Salary Inflation Factor	0.886746	0.905368	0.927097
E5	N/A	0	0	0
E6	N/A	0	0	0
E7	N/A	0	0	0
E8	Merit Increase (for Salary only)	0	0	0
E9	Merit Increase	0	0	0
E10	DC Plan Escalation	0	0	0
E11	401k Escalation: Labor + Merit	0	0	0
E12	DC Pension Escalation: Labor + Merit + DC Plan	0	0	0
E13	Medical Plan Escalation	0	0	0
E14	Dental Plan Escalation	0	0	0
E15	Vision Plan Escalation	0	0	0
E16	Salary + Merit	0	0	0
E17	0	0	0	0
E18	0	0	0	0
E19	0	0	0	0
E20	0	0	0	0
E21	0	0	0	0
E22	0	0	0	0
E23	0	0	0	0
E24	0	0	0	0
E25	0	0	0	0
E26	0	0	0	0
E27	0	0	0	0
E28	0	0	0	0
E29	0	0	0	0
E30	0	0	0	0
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E35	0	0	0	0
E36	0	0	0	0
E37	0	0	0	0
E38	0	0	0	0
E39	0	0	0	0
E40	0	0	0	0
E41	0	0	0	0
E42	0	0	0	0
E43	0	0	0	0

E44	0	0	0	0
E45	0	0	0	0
E46	0	0	0	0
E47	0	0	0	0
E48	0	0	0	0
E49	0	0	0	0
E50	0	0	0	0
E51	0	0	0	0
E52	0	0	0	0
E53	0	0	0	0
E54	0	0	0	0
E55	0	0	0	0
E56	0	0	0	0
E57	0	0	0	0
E58	0	0	0	0
E59	0	0	0	0
E60	0	0	0	0
E61	0	0	0	0
E62	0	0	0	0
E63	0	0	0	0
E64	0	0	0	0
E65	0	0	0	0
E66	0	0	0	0
E67	0	0	0	0
E68	0	0	0	0
E69	0	0	0	0
E70	0	0	0	0
E71	0	0	0	0
E72	0	0	0	0
E73	0	0	0	0
E74	0	0	0	0
E75	0	0	0	0
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Arden Cordova Maintenance Adjustments (Robbins)

Escalated	2018			2019			2020			2021			2022		
	2018	2019	2020	2018	2019	2020	2018	2019	2020	2018	2019	2020	2018	2019	2020
	55,028	59,508	60,889	55,028	59,508	60,889	51,912	51,912	50,310	51,912	51,912	50,310	50,310	50,310	50,310
	25,591	21,395	32,610	25,591	21,395	32,610	20,607	20,607	32,571	20,607	20,607	32,571	32,571	32,571	32,571
	19,253	11,084	10,768	19,253	11,084	10,768	12,824	12,824	13,617	12,824	12,824	13,617	13,617	13,617	13,617

CSA	Escalation Code	Customer Growth	2018	2019	2020	2021	2022
Meter	E1	E1	43,759	48,050	50,611	51,912	50,310
Pump	E1	E1	20,350	17,275	27,105	20,607	32,571
Leak	E1	E1	15,340	8,950	8,950	12,824	13,617

5 Year Escalated Average	GSWC Proposed Additional Adjustment	Cal Advocate Additional Adjustment	Adjusted Forecast
56,435	4,000	139	60,435
26,914	5,076	5,076	31,990
13,733	9,630	1,465	23,363



December 5, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
 505 Van Ness Avenue  
 San Francisco, CA 94102

Subject: Data Request SRA-005 (A.23-08-010)  
 Customer Service Performance Measure Partial Response No. 1  
 Due Date (Extended): December 5, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

**Final Read & Final Bill:**

- a. Please provide the amount of bills not provided within 14 calendar days of the meter read from years 2019-2023.
- b. Please provide the explanation for such bills not provided within 14 calendar days of the meter read from years 2019-2023.

**Response 1:**

<b>Final Read &amp; Final Bill</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Amount of bills not provided within 14 calendar days of the meter read from years 2019-2023.	0	22	16	18	19
b. Explanation for such bills not provided within 14 calendar days of the meter read from years 2019-2023.	The delay is caused by our inability to access the meter and or obtain the final meter read after the previous bill was already estimated. This has occurred in 0% to 0.11% of final bills over the past 5 years.				

**Question 2:**

**Bill Accuracy Performance Measure:** Please provide the following data in an excel tabulated spreadsheet

- a. The number of bills rendered within seven calendar days of the scheduled billing date from years 2019-2023.
- b. Total number of bills scheduled to be rendered for years 2019-2023.

**Response 2:**

2023 data is year to date data as of September 30, 2023.

<b>Billing Accuracy Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Number of bills rendered within seven calendar days of the scheduled billing date.	2,542,966	2,555,674	2,574,214	2,664,974	2,302,612
b. Number of bills scheduled to be rendered annually.	2,543,123	2,556,661	2,574,458	2,665,959	2,303,105

**Question 3:**

**Customer Requested Work Completion Performance Measure:**

- a. Please provide the number of customer orders not completed on or before the scheduled date for years 2019-2023.
- b. Please provide the total number of customer orders not scheduled and completed in the reporting month for years 2019-2023.

**Response 3:**

2023 data is year to date data as of September 30, 2023.

<b>Customer Requested Work Completion Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Number of customer requested work not completed on or before the scheduled date.	614	247	138	425	248
b. Number of customer orders not scheduled and completed in the reporting months.	0	0	0	0	0

**Question 4:**

**Service Interruption:** Refer to SRA-004 Q.6 Service Interruption Response. For the following questions, also provide explanations for service interruptions including date and time of service interruption, date and time service was restored, equipment that operated or failed, cause of interruption, actions required to restore service, and steps taken to prevent future recurrences.

- a. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin East CSA for years 2019 - 2022.
- b. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin West CSA for years 2019, 2022, and 2023.

- c. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Arden Cordova CSA for years 2020-2022.
- d. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Culver City CSA for years 2020, 2021, 2022, and 2023.
- e. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Southwest CSA for years 2019, 2020, 2021, 2022, and 2023.
- f. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the San Gabriel Valley CSA for years 2020, 2021, and 2023.
- g. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Los Alamitos CSA for years 2019- 2023.
- h. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Placentia CSA for years 2019- 2023.
- i. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Barstow CSA for 2019.

**Response 4:**

In an email received on November 27, Cal Advocates agreed to limit the scope of this question to the Culver City, Southwest, Los Alamitos and Placentia CSAs. Response will be provided by December 8th.

**Question 5:**

**Arden Expenses: Please refer to SRA-003 Question 1A Response viewing excel sheet titled SRA003-AC Maintenance, Sheet 1.**

- a. Please provide the justification for the amount of \$4,000 in cell Q4. How did GSWC estimate \$4,000 for additional expenses.
- b. Please provide the justification for the amount of \$5,076 in cell Q5. How did GSWC estimate \$5,076 for additional expenses.
- c. Please provide the justification for the amount of \$9,630 in cell Q6. How did GSWC estimate \$9,630 for additional expenses.

**Response 5:**

- a. The additional expense of \$4,000 is based on the estimate of an additional 2 meter tests annually.
- b. The additional expense of \$5,076 is based on the estimate of additional booster pump maintenance. Without historical operational data related to the Robbins system, GSWC is not able to determine exactly how much reconditioning will be required.
- c. The additional expense of \$9,630 is based on the estimate of an additional 2 leak detection surveys annually.

**Question 6:**

**Customer Complaints**

- a. Please provide GSWC's total company-wide customer count for 2023.



b. Please provide the number of complaints reported annually to CAB for 2019.

**Response 6:**

- a. As of October 31, 2023, GSWC has 263,998 active customers.
- b. 29

**Question 7:**

**Call Answer Performance Measure:**

- a. Please provide an explanation why GSWC's Call Answer Performance Measure is below 60% for years 2022 and 2023.

**Response 7:**

- 2022 - There were 35,000 more calls received in Q3 & Q4 2022 vs. Q3 & Q4 2021, due to resumption of disconnections for non-payment. Average call handling time increased from 3.5 minutes to 5 minutes. Phone coverage was not sufficient with an average staff shrinkage of -30%, due to increase in sick leave/dependent care use and staffing turnover.
- 2023 - Call volume is trending the same or slightly higher than 2022. Average call handling time remains at 5 minutes. Phone coverage was not sufficient with the average staff shrinkage still at -30%, due to increase in sick leave/dependent care use and staffing turnover.

**END OF RESPONSE**



October 25, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-003 (A.23-08-010)  
Due Date: October 19, 2023      Extension Due Date: October 26, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

Please refer to Gomez Testimony Expenses-APP Sheet.pdf, page 14, lines 1-5 for the following questions.

- a. In an Excel sheet, provide the calculations and inputs showing how GSWC calculated the estimates of additional \$18,706 for Arden Cordova's Maintenance Expenses.

**Response 1:**

- a. See ["SRA-003 - Response 1 - AC Maintenance"](#). Please refer to ["LCN-001 O&M Expenses Partial Response 2"](#) for more details on this adjustment.

**Question 2:**

Please refer to your earlier response to LCN-002, Question 6(a). Per GSWC "As acquisitions can be sporadic from a business perspective, they continue to be essential for some communities to receive quality service. These most recent consulting fees are a result of both the acquisition, as well as ongoing expenses for participation in the Regional Water Authority (RWA). This adjustment was used to bring the forecasted expenses more in line with recent annual costs".

- a. How often does GSWC pay participation fees to the RWA? Please provide supporting documentation, including invoices, for all expenses paid to RWA from the 2019-2023.
- b. Explain what GSWC means in the above quoted sentence with regard to “participation in the Regional Water Authority.” How does GSWC participate in the RWA and what purpose does this participation serve? Provide copies of all agreements between GSWC and the RWA.
- c. Please provide estimated expenses for the next three years (2025-2027) related to participation in the RWA in Arden Cordova and explain how these expenses relate to the Robbins System. Please provide all documents supporting your estimates.

**Response 2:**

- a. See listing of RWA invoices in “SRA – 003 – Response 2 – RWA Invoices”. Due to the volume of invoices, we have provided a list in excel and sample invoices can be provided upon request.
- b. The Regional Water Authority aims to align interests of regional water providers and stakeholders for the purpose of improving water supply reliability, availability, quality and affordability. By collaborating with several other regional water agencies, providers are able to solve complex issues through its unified approach. More information on RWA can be found at the following website: <https://rwah2o.org/>. Agreements dated back to 2019 are submitted with this response under “SRA-003 - Response 2 - RWA - CIMS Agreement”, “SRA-003 - Response 2 - RWA - Major Projects Agreement”, and “SRA-003 - Response 2 - RWA - Water Resilience Program”.
- c. These RWA expenses do not directly relate to the Robbins system. Projections for these expenses are expected to follow the current trend of a 5 year average adjusted for inflation. The additional \$8,500 adjustment requested has been calculated in “LCN-002 – Response 6 – Arden Consulting”. This adjustment was used in order to bring the forecasted expense more in line with recent annual costs.

**Question 3:**

Referring to SRA-002 response to Question 3, GSWC spent \$31,237 from May 1, 2022 to August 31, 2023, towards maintenance expenses for the Robbins System. Please answer the following questions.

- a. Identify which maintenance expenses identified in response to SRA-002, Question 3, are considered recurring in nature and their frequency per year.
- b. Provide details of activities and repairs performed for \$12,706 under Mains.
- c. Provide detail of activities and repairs performed for \$7,012 under PP-Pump.
- d. Provide details of activities and repairs performed for \$4,001 under WT-Structure.
- e. Provide details of activities and repairs performed for \$3,300 under PP-Other.
- f. Provide details of activities and repairs performed for \$3,079 under WT-Chem.

**Response 3:**

- a. See responses 3b to 3f.
- b. The Mains related maintenance includes recurring charges for maintenance to hydrants, valves, meters and leak repairs as needed. These expenses also include fees for leak detection services and encroachment permits.
- c. Pump maintenance is related to annual charges for pump and motor testing. This also includes recurring charges for general maintenance to pumps to ensure adequate system pressures being met.
- d. Structure maintenance expense relates to the recurring charges for recoating, exterior corrosion control and cleanings.
- e. The Other expenses relate to routine minor maintenance items that would not be classified in any of the other categories.
- f. These Chemical expenses relate to the ongoing maintenance to the chemical injection point, chemical feed lines, chemical pumps and chemicals for water treatment disinfection.

**END OF RESPONSE**



December 11, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Data Request SRA-005 (A.23-08-010)  
Customer Service Performance Measure Partial Response Final  
Due Date: December 8, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

**Final Read & Final Bill:**

- a. Please provide the amount of bills not provided within 14 calendar days of the meter read from years 2019-2023.
- b. Please provide the explanation for such bills not provided within 14 calendar days of the meter read from years 2019-2023.

**Response 1:**

[Response provided on December 5th, 2023.](#)

**Question 2:**

**Bill Accuracy Performance Measure:** Please provide the following data in an excel tabulated spreadsheet

- a. The number of bills rendered within seven calendar days of the scheduled billing date from years 2019-2023.
- b. Total number of bills scheduled to be rendered for years 2019-2023.

**Response 2:**

[Response provided on December 5th, 2023.](#)

**Question 3:**

**Customer Requested Work Completion Performance Measure:**

- a. Please provide the number of customer orders not completed on or before the scheduled date for years 2019-2023.
- b. Please provide the total number of customer orders not scheduled and completed in the reporting month for years 2019-2023.

**Response 3:**

[Response provided on December 5th, 2023.](#)

**Question 4:**

**Service Interruption:** Refer to SRA-004 Q.6 Service Interruption Response. For the following questions, also provide explanations for service interruptions including date and time of service interruption, date and time service was restored, equipment that operated or failed, cause of interruption, actions required to restore service, and steps taken to prevent future recurrences.

- a. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin East CSA for years 2019 - 2022.
- b. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin West CSA for years 2019, 2022, and 2023.
- c. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Arden Cordova CSA for years 2020-2022.
- d. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Culver City CSA for years 2020, 2021, 2022, and 2023.
- e. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Southwest CSA for years 2019, 2020, 2021, 2022, and 2023.
- f. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the San Gabriel Valley CSA for years 2020, 2021, and 2023.
- g. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Los Alamitos CSA for years 2019- 2023.
- h. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Placentia CSA for years 2019- 2023.
- i. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Barstow CSA for 2019.

**Response 4:**

- d. See file ["SRA-005 – Response 4 – Culver City Service Interruption Data"](#) for details.
- e. See file ["SRA-005 – Response 4 – Southwest Service Interruption Data"](#) for details.
- g. See file ["SRA-005 – Response 4 – Los Alamitos Service Interruption Data"](#) for details.
- h. See file ["SRA-005 – Response 4 – Placentia Service Interruption Data"](#) for details.

In an email received on November 27, Cal Advocates agreed to limit the scope of this question to the Culver City, Southwest, Los Alamitos and Placentia CSAs.

GSWC has included a corrected version to SRA-004 Question 6. Please see attachment "SRA-004 Q.6 Service Interruptions-Corrected".

**Question 5:**

**Arden Expenses: Please refer to SRA-003 Question 1A Response viewing excel sheet titled SRA003-AC Maintenance, Sheet 1.**

- a. Please provide the justification for the amount of \$4,000 in cell Q4. How did GSWC estimate \$4,000 for additional expenses.
- b. Please provide the justification for the amount of \$5,076 in cell Q5. How did GSWC estimate \$5,076 for additional expenses.
- c. Please provide the justification for the amount of \$9,630 in cell Q6. How did GSWC estimate \$9,630 for additional expenses.

**Response 5:**

Response provided on December 5th, 2023.

**Question 6:**

**Customer Complaints**

- a. Please provide GSWC's total company-wide customer count for 2023.
- b. Please provide the number of complaints reported annually to CAB for 2019.

**Response 6:**

Response provided on December 5th, 2023.

**Question 7:**

**Call Answer Performance Measure:**

- a. Please provide an explanation why GSWC's Call Answer Performance Measure is below 60% for years 2022 and 2023.

**Response 7:**

Response provided on December 5th, 2023.

**END OF RESPONSE**



December 5, 2023

To: Ama Serwaa, Public Advocates Office  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
 505 Van Ness Avenue  
 San Francisco, CA 94102

Subject: Data Request SRA-005 (A.23-08-010)  
 Customer Service Performance Measure Partial Response No. 1  
 Due Date (Extended): December 5, 2023

Dear Ama Serwaa,

In response to the above referenced data request number, we are pleased to submit the following responses:

**Question 1:**

**Final Read & Final Bill:**

- a. Please provide the amount of bills not provided within 14 calendar days of the meter read from years 2019-2023.
- b. Please provide the explanation for such bills not provided within 14 calendar days of the meter read from years 2019-2023.

**Response 1:**

<b>Final Read &amp; Final Bill</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Amount of bills not provided within 14 calendar days of the meter read from years 2019-2023.	0	22	16	18	19
b. Explanation for such bills not provided within 14 calendar days of the meter read from years 2019-2023.	The delay is caused by our inability to access the meter and or obtain the final meter read after the previous bill was already estimated. This has occurred in 0% to 0.11% of final bills over the past 5 years.				



**Question 2:**

**Bill Accuracy Performance Measure:** Please provide the following data in an excel tabulated spreadsheet

- a. The number of bills rendered within seven calendar days of the scheduled billing date from years 2019-2023.
- b. Total number of bills scheduled to be rendered for years 2019-2023.

**Response 2:**

2023 data is year to date data as of September 30, 2023.

<b>Billing Accuracy Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Number of bills rendered within seven calendar days of the scheduled billing date.	2,542,966	2,555,674	2,574,214	2,664,974	2,302,612
b. Number of bills scheduled to be rendered annually.	2,543,123	2,556,661	2,574,458	2,665,959	2,303,105

**Question 3:**

**Customer Requested Work Completion Performance Measure:**

- a. Please provide the number of customer orders not completed on or before the scheduled date for years 2019-2023.
- b. Please provide the total number of customer orders not scheduled and completed in the reporting month for years 2019-2023.

**Response 3:**

2023 data is year to date data as of September 30, 2023.

<b>Customer Requested Work Completion Performance Standard</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
a. Number of customer requested work not completed on or before the scheduled date.	614	247	138	425	248
b. Number of customer orders not scheduled and completed in the reporting months.	0	0	0	0	0

**Question 4:**

**Service Interruption:** Refer to SRA-004 Q.6 Service Interruption Response. For the following questions, also provide explanations for service interruptions including date and time of service interruption, date and time service was restored, equipment that operated or failed, cause of interruption, actions required to restore service, and steps taken to prevent future recurrences.

- a. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin East CSA for years 2019 - 2022.
- b. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Central Basin West CSA for years 2019, 2022, and 2023.

- c. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in Arden Cordova CSA for years 2020-2022.
- d. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Culver City CSA for years 2020, 2021, 2022, and 2023.
- e. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Southwest CSA for years 2019, 2020, 2021, 2022, and 2023.
- f. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the San Gabriel Valley CSA for years 2020, 2021, and 2023.
- g. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Los Alamitos CSA for years 2019- 2023.
- h. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Placentia CSA for years 2019- 2023.
- i. Provide an explanation for why GSWC experienced emergency and scheduled interruptions in the Barstow CSA for 2019.

**Response 4:**

In an email received on November 27, Cal Advocates agreed to limit the scope of this question to the Culver City, Southwest, Los Alamitos and Placentia CSAs. Response will be provided by December 8th.

**Question 5:**

**Arden Expenses: Please refer to SRA-003 Question 1A Response viewing excel sheet titled SRA003-AC Maintenance, Sheet 1.**

- a. Please provide the justification for the amount of \$4,000 in cell Q4. How did GSWC estimate \$4,000 for additional expenses.
- b. Please provide the justification for the amount of \$5,076 in cell Q5. How did GSWC estimate \$5,076 for additional expenses.
- c. Please provide the justification for the amount of \$9,630 in cell Q6. How did GSWC estimate \$9,630 for additional expenses.

**Response 5:**

- a. The additional expense of \$4,000 is based on the estimate of an additional 2 meter tests annually.
- b. The additional expense of \$5,076 is based on the estimate of additional booster pump maintenance. Without historical operational data related to the Robbins system, GSWC is not able to determine exactly how much reconditioning will be required.
- c. The additional expense of \$9,630 is based on the estimate of an additional 2 leak detection surveys annually.

**Question 6:**

**Customer Complaints**

- a. Please provide GSWC's total company-wide customer count for 2023.

b. Please provide the number of complaints reported annually to CAB for 2019.

**Response 6:**

- a. As of October 31, 2023, GSWC has 263,998 active customers.
- b. 29

**Question 7:**

**Call Answer Performance Measure:**

- a. Please provide an explanation why GSWC's Call Answer Performance Measure is below 60% for years 2022 and 2023.

**Response 7:**

- 2022 - There were 35,000 more calls received in Q3 & Q4 2022 vs. Q3 & Q4 2021, due to resumption of disconnections for non-payment. Average call handling time increased from 3.5 minutes to 5 minutes. Phone coverage was not sufficient with an average staff shrinkage of -30%, due to increase in sick leave/dependent care use and staffing turnover.
- 2023 - Call volume is trending the same or slightly higher than 2022. Average call handling time remains at 5 minutes. Phone coverage was not sufficient with the average staff shrinkage still at -30%, due to increase in sick leave/dependent care use and staffing turnover.

**END OF RESPONSE**