Docket	:	A.26-01-001
Exhibit Number	:	Cal Adv -
Commissioner	:	Matthew Baker
Administrative Law Judge	:	Amin Nojan
Public Advocates Office Witness(es)	:	Zaved Sarkar

PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

REPORT ON PLANT PROJECTS FOR WHITTIER-LA MIRADA AND SATIVA SYSTEMS

Suburban Water Systems
General Rate Case Application 26-01-001
Test Year 2027

PUBLIC

Los Angeles, California
April 15, 2026

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MEMORANDUM

The Public Advocates Office at the California Public Utilities Commission ("Cal Advocates") examined application material, data request responses, and other information presented by Suburban Water Systems ("Suburban") in Application ("A.") 26-01-001 to provide the California Public Utilities Commission ("Commission" or "CPUC") with recommendations in the interests of ratepayers for safe and reliable service at the lowest cost. This Report has been prepared by Mr. Zaved Sarkar. Mr. Suliman Ibrahim is Cal Advocates' project lead for this proceeding. Mr. Hani Moussa is the oversight supervisor. Mr. Corwin Hockema is the legal counsel.

Although every effort was made to comprehensively review, analyze, and provide the Commission with recommendations on each ratemaking and policy aspect presented in the Application, the absence of any particular issue from Cal Advocates' testimony connotes neither agreement nor disagreement with the underlying request, methodology, or policy position related to that issue.

Chapter #	Description	Witness
1	Whittier-La Mirada System Plant Projects	Zaved Sarkar
2	Sativa System Plant Projects	Zaved Sarkar

CHAPTER 1 WHITTIER-LA MIRADA SYSTEM PLANT PROJECTS

I. INTRODUCTION

This chapter discusses Suburban's Whittier-La Mirada systems proposed capital projects and Cal Advocates' recommended budget for 2026 to 2028. Cal Advocates uses its recommended budget in this chapter as a component of the total capital budget for Utility Plant-in-Service. Suburban's proposed plant projects in its Whittier-La Mirada System, as discussed below, lack adequate justification and should be denied.

II. SUMMARY OF RECOMMENDATIONS

The Commission should adopt Cal Advocates' recommendations presented below:

Table 1-1: Cal Advocates Recommended Budget for Whittier-La Mirada System – Whittier La Mirada Projects[1]

	2022		2023		2024		2025		2027		2028	
Project	**Suburban**	**Cal Advocates**	**Suburban**	**Cal Advocates**	**Suburban**	**Cal Advocates**	**Suburban**	**Cal Advocates**	**Suburban**	**Cal Advocates**	**Suburban**	**Cal Advocates**
La Mirada Yard Test Well	$1,058,851	$ -	$224,215	$ -								
Well Drilling on City of La Mirada Yard			$ 12,985	$ -	$ 3,154,059	$ -						
Well Pumping Equipment on City of La Mirada Yard					$ 167,282	$ -	$ 90,594	$ -			$5,343,413	$ -
Plant 216 Test Well			$ 47,267	$ -	$ (426)	$ -	$793,818	$ -				
Plant 216/231 Well Drilling									$ 3,606,894	$ -	$3,606,894	$ -
Total	$1,058,851	$ -	$284,467	$ -	$ 3,320,915	$ -	$884,412	$ -	$ 3,606,894	$ -	$8,950,307	$ -

[1] Numbers for 2026 are not impacted for the discussed projects. Hence, they are not shown in this table.

III. ANALYSIS

A. Suburban's Proposed Increase for (P-9): Stage Rd. Piping and Equipping (2028) is Unjustified

Suburban requests $5,343,413 in 2028 for equipment, electrical upgrades, piping, and site improvements for the well at Plant 429.[2] Suburban also requests that the land lease cost of $670,434,[3] completed test well cost of $1,283,066,[4] and production well cost of $3,167,044,[5] be included in the rate base. Accounting for all costs, the total corrected scope of this project is now $10,721,833[6]. Table 1-2 shows the updated total project cost. In the previous GRC, Suburban estimated the total scope of this project at $8,000,310.[7] This is an approximately 34% increase in costs. For context, using an online inflation calculator using the average consumer price index data, $8,000,310 in 2023 is the equivalent of $8,580,125 in 2026, factoring in inflation.[8] Suburban claims the increase in budget is primarily due to inflation affecting the cost of equipping and piping the well.[9]

Table 1-2: Updated cost estimates for Plant 429

Description	2023 Filing	2026 Filing	% Difference
Test Well	$1,079,754	$ 1,283,066	19%
Land Lease	$ 439,488	$ 670,434	53%
Production Well	$4,213,683	$ 3,167,044	-25%
Well Piping and Equipping	$2,267,385	$ 5,601,289	147%
Total	$8,000,310	$10,721,833	34%

[2] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 286.

[3] Attachment 1-1: RESPONSE to Cal PA DR ZS1-004 (Stage Rd Well), 1.b. ii. The previous Present Value (PV) calculation of $435,056 was subsequently revised. The updated PV amount is $670,434.

[4] Suburban's Results of Operation Model, Tab: "MODEL", Table 6-1B, cell J3792+K3792.

[5] Suburban's Results of Operation Model, Tab: "MODEL", Table 6-1B, cell L3865.

[6] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 307.

[7] A.23-01-001, Direct Testimony of Jorge Lopez, at 136.

[8] Calculator.net online inflation calculator used. Inflation Calculator (accessed 4/01/2026)

[9] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 306, lines 23-24.

In this GRC, Suburban states that it has fulfilled requirements from CPUC Decision 24-12-030 that included executing a ground lease agreement with the City of La Mirada, and completing review of well water quality data that demonstrated the well is suitable for use.[10] Suburban states that it constructed a test well at Plant 429 in 2022. The test well showed acceptable water quality and capacity.[11] Suburban completed drilling a new Central Basin production well in 2024, at Plant 429.[12] According to Suburban, test results showed that a well could produce 1,200 GPM (1,936 AFY), and the water quality was suitable for treatment at Suburban's Plant 409.[13] Suburban bases this claim on a report produced by Hazen and Sawyer (Hazen).[14]

The Hazen report states that "During the drilling, construction, and development of Well 429-W1, a single water quality sample was collected and analyzed. At the time of this report, no additional groundwater sampling has been conducted, therefore the current assessment is based solely on the initial sampling event conducted in December of 2024."[15] Suburban uses this as the basis to suggest that water from Plant 429 can be moved to a nearby Plant 409 which has existing water treatment facilities, and can be blended to provide acceptable drinking water quality.[16] During discovery[17], Suburban did not provide any additional explanation as to why only one water sample was taken since December 2024,[18] when the test well was drilled. Although Suburban suggests, it has

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[10] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 287, line 8-10.

[11] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 287, line 19-20.

[12] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 289, line 4.

[13] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 289, line 19-20.

[14] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 301 and SWS WORKPAPERS VOLUME III, Appendix 4 - Hazen Water Quality Analysis, PDF page 2076-2093.

[15] SWS WORKPAPERS VOLUME III, Appendix 4 - Hazen Water Quality Analysis, Section 2 – *Data Evaluation*.

[16] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 301.

[17] Attachment 1-1: A.26-01-001, Public Advocates Office DR ZS1-004 (Stage Road Well Piping and Equipping), Q 5.a.

[18] Attachment 1-1: RESPONSE to Cal PA DR ZS1-004 (Stage Rd Well), 5.a.

great confidence that the water produced from this well will meet water quality standards,[19] it is unreasonable to suggest high project costs to install equipment and piping for a well site that has not been thoroughly evaluated for water quality.

Additionally, Suburban's cost to equip the production well at Plant 429 and to put extra piping to Plant 409 is not fully justified. In the prior GRC, Suburban's estimated budget for well equipping was $1,112,735 and piping to Plant 409 was $1,154,650.[20] In this GRC, Suburban proposes $5,343,413 for the same estimated work. That is an increase of approximately 147% within a rate case. Suburban claims the original project cost estimates were done in 2022, and since then construction-related inflation has increased significantly.[21] By using an online inflation calculator using the average consumer price index data, $2,267,385 in 2022 is the equivalent of $2,531,812 in 2026, factoring in inflation.[22] Please see Figure 1-1 below for calculation. Suburban's request for $5,343,413 to equip the new well and pipe towards Plant 409 is unreasonable.

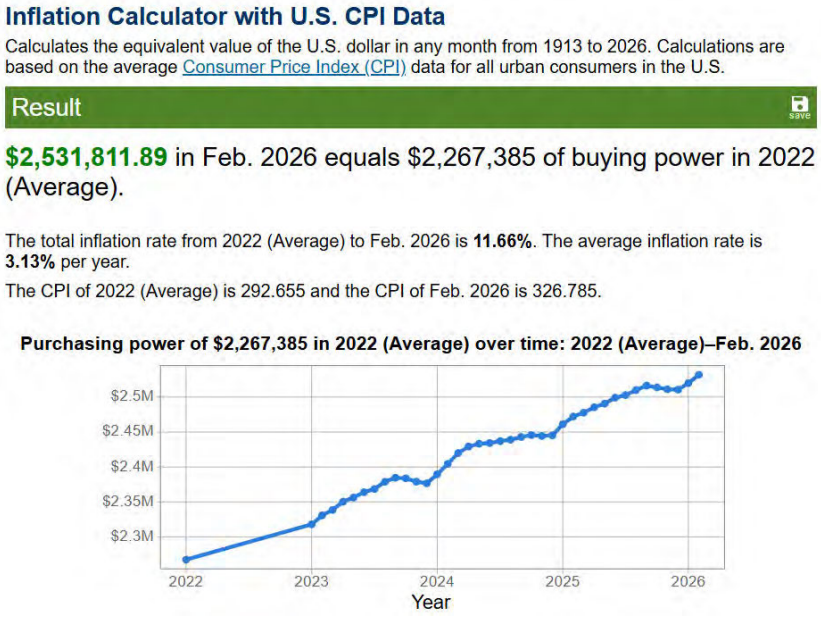
[19] Attachment 1-1: RESPONSE to Cal PA DR ZS1-004 (Stage Rd Well), 5.a. ii. 2.

[20] A.23-01-001, Direct Testimony of Jorge Lopez, at 136.

[21] Attachment 1-1: RESPONSE to Cal PA DR ZS1-004 (Stage Rd Well), 2.

[22] Calculator.net online inflation calculator used. Inflation Calculator (accessed 3/30/2026).

Figure 1-1: Inflation Calculation with US CPI Data



The Commission should exclude $5,343,413 from rate base for well piping and equipment for the new well on Stage Road, because Suburban has not justified the increase. The Commission should also exclude the land lease cost of $670,434, completed test $1,283,066 and production $3,167,044 wells costs from rate base, since the well at Plant 429 will not be used and useful in this GRC.

B. (P-12) Well Drilling and Equipping at Plant 216 (2028) is Unreasonable and Does not Benefit Ratepayers

Suburban requests $3,606,894 in 2028 to drill a production well at Plant 216. Suburban also indicates that it plans to request an additional $6,271,153 in 2029 for well equipment, piping, and treatment in a subsequent GRC. The total scope of the project is estimated at $10,583,642.[23] In the previous GRC, Suburban estimated the total scope of this project at $8,362,498.[24] This is an approximately 27% increase in costs. For context,

[23] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 361.

[24] A.23-01-001, Direct Testimony of Jorge Lopez, at 390.

using an online inflation calculator using the average consumer price index data, $8,362,498 in 2023 is the equivalent of $8,968,562 in 2026, factoring in inflation.[25]

In last GRC, Suburban requested to fund a test well and a production well in the same year.[26] In this GRC, Suburban states that it has fulfilled the requirements of CPUC Decision 24-12-030, including the successful completion of a test well at Plant 216 in September 2025.[27] A test well is needed to check the water quality and production capacity. Absent any water quality or production capacity data, it is impossible to tell if the proposed production well is viable. Suburban claims that it has confirmed test results "which show that the site can produce 1,000 GPM of water with acceptable quality, requiring only manganese treatment and blending at nearby Plant 224 to meet drinking water standards."[28] Suburban bases this claim on a report produced by KYLE Groundwater, Inc (KYLE report).[29]

The KYLE report states that there is limited data on current aquifer yields near Plant 216 and the broader Whittier area because there are no active wells nearby. However, the report relies on inferences from Plant 231 W-1, a former production well located 200 feet south-southwest of the site, which was built in 1981. This former 10-inch well tapped into a deep section of the aquifer (260 to 946 feet deep) and pumped 1,125 gpm with a specific capacity of 28 gpm/ft. The well was decommissioned in 1996 for unknown reasons.[30] Figure 1-2 below shows the detailed locations of these well sites. Suburban uses this as the basis for "confirmed test results" to suggest that the newly drilled test well can *also* produce 1,000 GPM and assumes that a newly drilled

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[25] Calculator.net online inflation calculator used. Inflation Calculator (accessed 4/01/2026)

[26] A.23-01-001, Direct Testimony of Jorge Lopez, at 390

[27] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 342, line 3-4.

[28] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 342, line 5-7.

[29] SWS WORKPAPERS VOLUME III, Appendix 9 - KYLE Groundwater Plant 216 Test Well Report, at PDF page 2716-2995.

[30] SWS WORKPAPERS VOLUME III, Appendix 9 - KYLE Groundwater Plant 216 Test Well Report, Section: *Production Potential*, at PDF page 2721-2722.

production well in the future can produce the same level. During discovery, Suburban stated the same in response.[31] However, Suburban's current assumptions regarding the ability to produce 1,000 to 1,500 GPM are speculative.[32]

Figure 1-2: Well site location for test well at Plant 216, proposed production well and decommissioned Well 231 W-1.[33]

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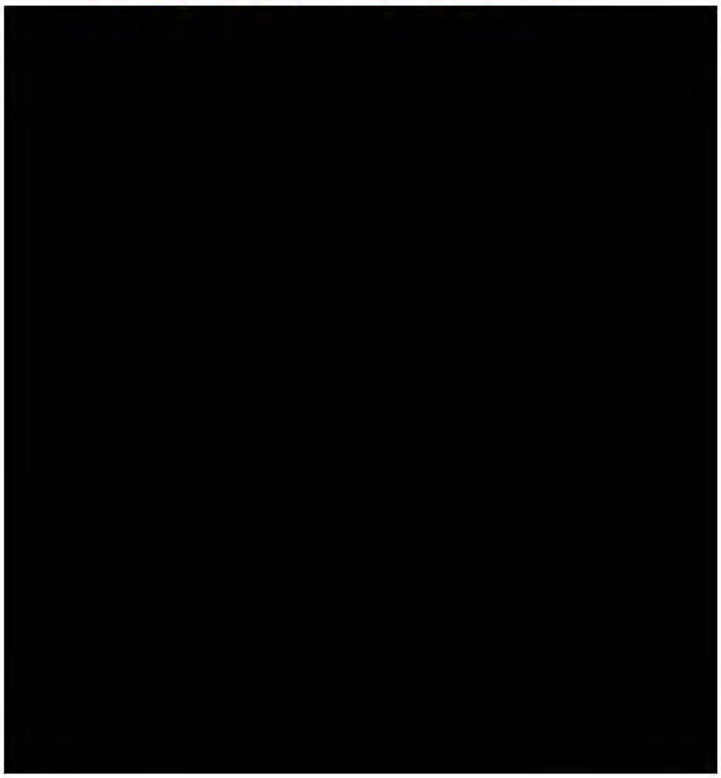

<<END CONFIDENTIAL>>

[31] Attachment 1-2: RESPONSE to Cal PA DR ZS1-005 (Well Drilling & Equipping at Plant 216), 8.a.i.

[32] Attachment 1-2: RESPONSE to Cal PA DR ZS1-005 (Well Drilling & Equipping at Plant 216), 8.a.i. Quote "Yes, Suburban did test the well drilled in Plant 216 in 2025 to determine an estimated production capacity of a production well.

[33] SWS WORKPAPERS VOLUME III, Appendix 9 - KYLE Groundwater Plant 216 Test Well Report, Section: *Production Potential*, at PDF, p. 2728.

In the last GRC, Suburban used a similar justification and cited the Plant 211 Exploratory Well test drilling as an example to estimate the production capacity of the new well at Plant 216.[34] Suburban provided a study by Wood Rogers that presents the production measurements and water quality testing for Plant 211.[35] In the study, Wood Rogers states the estimated production rate for a well constructed according to its best design is approximately 1,300 gpm. It also concludes that "These calculations are estimates only and it should be noted that actual production rates may differ".[36] Plant 211 is not in the immediate vicinity of Plant 216 as shown in Figure 1-3 below. After the Suburban test well was drilled at Plant 211, it was not developed into a production well due to untreatable water quality. In the absence of any verifiable physical tests to justify its production capacity claims, neither Plant 211 nor Plant 231 test wells can be used as the best example for estimating production capacity at Plant 216.

[34] A.23-01-001, Direct Testimony of Jorge Lopez, at 378.

[35] Attachment 1-2: RESPONSE to Cal PA DR ZS1-005 (Well Drilling & Equipping at Plant 216), 8. a. ii, Attachment - DR ZS1-005 #8.a.ii.1 Plant 211 Study.pdf

[36] Plant 211 Study - Well Construction Summary Report Drilling, Construction, Development and Testing Plant 211 Monitoring Well, by Wood Rogers, dated April 2017, p.F 21 of 253.

Figure 1-3: Well site location for test well at Plant 216 and Plant 211 exploration well.[37]

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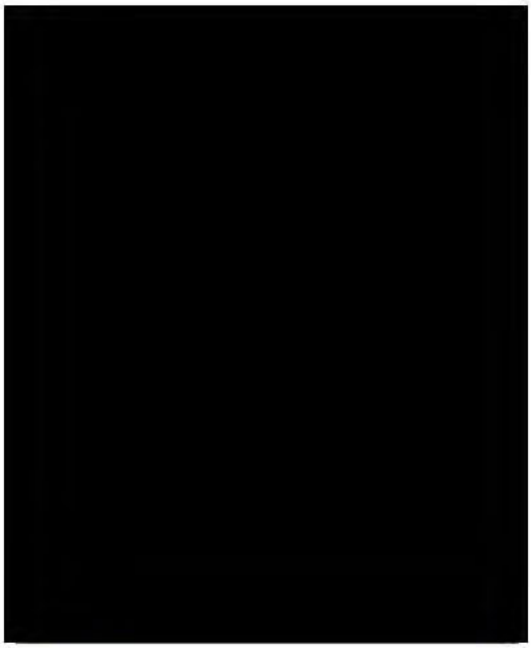

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Plant 216, which is designated as MW-1, cannot meet Suburban's estimated 1,000 gpm production because the shallow and deep aquifers are contaminated, and only the middle aquifer can produce treatable water. Construction of MW-1 began on August 28, 2025, and was completed on September 3, 2025. The well screens consist of 2.5-inch Schedule 80 flush-threaded PVC casing with 0.030-inch mill-slotted openings extending from 486 to 506 feet bgs, 590 to 610 feet bgs, and 826 to 846 feet bgs for three different depths.[38] The shallow, middle, and deep well completions (designated as MW-1S, MW-1M, and MW-1D) were designed with total depths of 516, 620, and 856 feet bgs, respectively. The report includes a summary of water quality analytical results for each monitoring well completion and concludes it has various water quality issues such as

[37] Attachment 1-2: RESPONSE to Cal PA DR ZS1-005 (Well Drilling & Equipping at Plant 216), 8.a.ii.2 – Attachment DR ZS1-005 #8.a.ii.2 Plant 211 Map.pdf

[38] SWS WORKPAPERS VOLUME III, Appendix 9 - KYLE Groundwater Plant 216 Test Well Report, Section: *Production Potential*, at PDF, p. 2720.

Manganese, MBAS, Specific Conductance, Sulfate, Total Filterable Residue (i.e., TDS) and three different variant of PFAS.[39] KYLE report concluded that Suburban can avoid these water quality constituents by essentially drilling a well at MW-1M.[40] In response to the discovery regarding the KYLE report, Suburban stated, "Suburban's conceptual design of the Plant 216 production well will draw water from the middle and deep aquifers. This design balances water quality with production capacity goals. The production well would not reach the desired production capacity of 1,000 GPM if it only produced from the middle aquifer."[41]

The proposed Plant 216 production well is unlikely to meet production targets because it is based on Suburban's speculations. Additionally, because a test well would not deliver water to Suburban's customers in this GRC, ratepayers should not be forced to fund a new production well. The Commission should deny Suburban's request to include the cost of the test well and a production well at Plant 216 in rates.

IV. CONCLUSION

The Commission should not adopt Suburban's recommendations for the Whittier-La Mirada projects because they are not just and reasonable. Instead, it should adopt Cal Advocates' recommendations because they include only necessary costs that will be used and are useful.

- Stage Rd Well Drilling and Piping should not be approved to include in rates.
- Plant 216 test well, production well drilling and equipping should not be approved to include in rates.

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[39] SWS WORKPAPERS VOLUME III, Appendix 9 - KYLE Groundwater Plant 216 Test Well Report, Section: *Groundwater Quality*, at PDF, p. 2722-2723.

[40] SWS WORKPAPERS VOLUME III, Appendix 9 - KYLE Groundwater Plant 216 Test Well Report, Section: *Anticipated Conditions*, at PDF, p. 2724.

[41] Attachment 1-2: RESPONSE to Cal PA DR ZS1-005 (Well Drilling & Equipping at Plant 216), 8.b.

CHAPTER 2 SATIVA SYSTEM PLANT PROJECTS

I. INTRODUCTION

This chapter discusses Suburban's Sativa systems proposed capital projects and Cal Advocates' recommended budget for 2026 to 2028. Cal Advocates uses its recommended budget in this chapter as a component of the total capital budget for Utility Plant-in-Service. Suburban's proposed plant projects in its Sativa System, as discussed below, lacks adequate justification and should be denied.

II. SUMMARY OF RECOMMENDATIONS

The Commission should adopt Cal Advocates' recommendations presented below:

Table 2-1: Cal Advocates Recommended Budget for Sativa Projects[42]

	2023		2024		2025		2026		2028	
Project	**Suburban**	**Cal Advocates**	**Suburban**	**Cal Advocates**	**Suburban**	**Cal Advocates**	**Suburban**	**Cal Advocates**	**Suburban**	**Cal Advocates**
Sativa Land Purchase							$1,000,000	$ -		
Sativa Customers First in Line for Water Supply Project									$3,140,168	$ -
Sativa Manganese Treatment Plant Well-5							$3,927,656	$3,603,354		
Sativa Pipeline Phase 1	$ 82,775	$ -	$3,749,490	$ -	$1,522,898	$ -				
Sativa Pipeline Phase 2			$ 21,725	$ -					$3,368,048	$ -
Sativa Plant 802: Site Improvements	$ 35,677	$ -			$ 37,496	$ -				
Total	$ 118,452	$ -	$3,771,215	$ -	$1,560,394	$ -	$4,927,656	$3,603,354	$6,508,216	$ -

III. ANALYSIS

A. (P-2) Sativa Manganese Treatment Plant Well-5 (2026) Includes Unjustified Expenses

The Commission should approve $3,603,354 for project cost for the Sativa manganese treatment in this GRC to be included into rates.

[42] Numbers for 2027 are not impacted for the discussed projects. Hence, they are not shown in this table.

Suburban requests $3,997,636 in 2026 to pay for the manganese treatment at Sativa Well-5.[43] The original estimated project cost was $2,365,637,[44] and was managed by the Los Angeles County Public Works (LACPW) with a projected completion in 2024. LACPW secured $2.25 million of state grant funds, and Suburban is to pay the remaining balance upon completion.[45]

During Suburban's acquisition of the Sativa Water System from the LACPW, this project had been separated from the acquisition contract, and Suburban agreed to have LACPW retain ownership until the project was complete. This was required in the Memorandum of Understanding (MOU) for the Sativa LA County Water District Water Quality Improvement project between the County of Los Angeles (Local Project Sponsor) and Los Angeles County Flood Control District (LACFCD). LACFCD is designated as the regional entity responsible for applying for grants, administering and managing grant funds, and providing oversight.[46]

According to Suburban, LACPW initially budgeted the project to be $2.25 million in 2018, hence the grant funding amount of $2.25 million, but revised the budget to be $5.8 million in 2023.[47] Suburban provided a revised estimate project balance of $5,853,354, which was provided by Mr. Joon Young Jang, the contact person from LACPW on October 17, 2025.[48]

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[43] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 161 and Suburban's Results of Operation Model, Tab: "MODEL", Table 6-1B, cell K3863+L3863+M3863+N3863 = $3,997,636.

[44] Attachment 2-1: RESPONSE to Cal PA DR ZS1-001 (Sativa Manganese Treatment), 1.c, Attachment - DR ZS1-001 #1.c Sativa_Att5_Budget.pdf.

[45] Attachment 2-1: RESPONSE to Cal PA DR ZS1-001 (Sativa Manganese Treatment), 1.a, Attachment - DR ZS1-001 #1.a County of LA Sativa MOU.pdf, p. 3.

[46] Ibid.

[47] Attachment 2-1: RESPONSE to Cal PA DR ZS1-001 (Sativa Manganese Treatment), 1.b, Attachment - DR ZS1-001 #1.b - LA County Notification_02.14.23.pdf.

[48] Attachment 2-1: RESPONSE to Cal PA DR ZS1-001 (Sativa Manganese Treatment), 1.b, Attachment - DR ZS1-001 #1b - LA County_07.31.25.pdf.

According to Suburban discovery response, LA County did not provide support to explain the cost increase from the 2019 estimate to the bid opening on 2/13/2023.[49] Suburban blames global supply chain disruptions, national inflation, and a lack of local contractor availability.[50] LACPW's most recent project estimate shows Suburban's cost for this project is $3,603,354 and the $2,250,000 grant added to it, makes it a grand total of $5,853,354. Please see below Table 2-2 which is an excerpt from Suburban's data response.[51]

Table 2-2: Suburban's Cost Estimate for Well-5 Manganese Treatment

Agency	Task	Amount
Waterworks	Project Administration	$100,000
	Permitting, CEQA	$190,637
Tetra Tech	Design	$190,000
	Construction Assistance	$313,271
WRD	Construction Administration	$200,000
	Contract Services	$15,000
Butier	Construction Management	$500,000
Metro Builders	Construction	$4,344,446
	TOTAL	$5,853,354
	IRWM Grant	$2,250,000
	Suburban Cost	$3,603,354

Suburban is not managing this project. Yet Suburban adds a 9% General Administration to the project cost, which amounts to $324,302.[52] Suburban did not explain why it incurred any administrative costs, as it is not the administrator of this project. The Commission should reject this unjustified addition of $324,302 and only approve $3,603,354 project cost for the Sativa manganese treatment in this GRC.

[49] Attachment 2-1: RESPONSE to Cal PA DR ZS1-001 (Sativa Manganese Treatment), 1.e.

[50] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 164, lines 6-9.

[51] Attachment 2-1: RESPONSE to Cal PA DR ZS1-001 (Sativa Manganese Treatment), 1.b, Attachment - DR ZS1-001 #1. b _LA County_Cost Estimates.xlsx.

[52] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 167.

B. Bolted Reservoir (300,000 gallons) (site no. 4) (2024) Project is Unjustified and Should be Excluded

The Commission should deny Suburban's request to include this project in rates because it is unjustified.

The Commission, in its decision from the last GRC, denied Suburban's request to install a 300,000-gallon steel tank at the Well-4 site.[53] Suburban still included $325,833 in rate base calculations for 2024.[54] Suburban did not provide any additional information or justification as to why this cost was included. In Section D of this chapter, Cal Advocates explained that Suburban does not require any storage in its Sativa system, and nothing has changed since the last GRC to make this project a viable option.

The Commission should not approve this project cost because it was denied in the last GRC, and Suburban has not provided any additional justification to verify this cost.

C. (P-5A) Sativa Water System Land Purchase (2026) Will Not be Used and Useful and Should be Excluded

The Commission should exclude the land purchase costs because these parcels of land are not needed and will not be used or useful.

Suburban requests to include $1,000,000 in rate base for 2025 to purchase a 6,500 square feet (sq-ft) parcel of land adjacent to Plant 803 which houses Well-5 and the manganese treatment.

Suburban has had the property appraised at $660,000 by Colliers International.[55] Cal Advocates inquired about all invoices, property deeds and email correspondence involved in purchase of these parcels of land.[56] In response. Suburban provided email correspondence with the Escrow company named Central Escrow Group, Inc., which

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[53] Decision 24-12-030 December 19, 2024, at PDF pages 115-116.

[54] Suburban's Results of Operation Model, Tab: "MODEL", Table 6-1B, cell L3865.

[55] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 206, lines 10-11.

[56] Attachment 2-2: A2601001 Public Advocates Office DR ZS-003 (Sativa Customers First in Line for Water Supply Project), Q 9.a.

shows a purchase price of $627,000.[57] Suburban did not provide any additional documentation to show how it arrived at the $1,000,000 cost estimate for this land.

Suburban provided ariel pictures of the property in question, which shows the adjacent parcel of land with address **<<BEGIN CONFIDENTIAL>>** [redacted] St **<<END CONFIDENTIAL>>**. During the 02/24/2026 Suburban 2026 District Tour, Cal Advocates toured this property while visiting Well-5 Manganese treatment facility. Not only did Suburban staff show the property with address **<<BEGIN CONFIDENTIAL>>** [redacted] **<<END CONFIDENTIAL>>,** but Cal Advocates staff also toured the property with an address of **<<BEGIN CONFIDENTIAL>>** [redacted] **<<END CONFIDENTIAL>>**. This property is an abandoned two-story house with a large driveway and parking space. The pictures in Figure 2-1 below from Google Maps show the two properties side by side.

[57] Attachment 2-2: RESPONSE to Cal PA DR ZS1-003 (Sativa Custs. 1st Line for Water Supply Project), Attachment - DR ZS1-003 #9.a Escrow email.pdf, at page 3 of 8.

<<BEGIN CONFIDENTIAL>>

<<END CONFIDENTIAL>>

Suburban justifies the need for this property by stating that, without this additional property, cranes and other large equipment required to maintain the well and treatment facility would have to be parked on Aranbe Avenue and extend over the plant. Once the Well 5 Manganese treatment facilities go online in the 2nd quarter of 2026,[58] however, Suburban periodic operational access to this site can be planned. Suburban can also notify

[58] Attachment 2-1: RESPONSE to Cal PA DR ZS1-001 (Sativa Manganese Treatment), 1.g.

the neighboring residents about pre-planned maintenance activities. Suburban's desire to book $1,000,000 in rate base to justify extra space and access to maintain the treatment facility at Well 5 is unreasonable.

Cal Advocates inquired about the possibility of getting an easement to use the next-door property in cases of operational and maintenance needs. In response, Suburban stated that it didn't attempt to get easement since it apparently wasn't an option after the original owners had passed away and the property needed to be liquidated for estate purposes.[59] In addition to acquiring these parcels of land, Suburban must spend significant time and money to demolish the existing buildings and create the space it intends to use. Furthermore, Suburban has failed to provide that estimate to reflect the true cost of this land acquisition.[60]

Suburban customers, the ratepayers, are forced to fund a project that does not produce any benefits in this GRC cycle, as the land will not be used or useful in the foreseeable future. The Commission should not allow Suburban to include the land purchase project costs of $1,000,000 in the rate base. Furthermore, any financing costs for the brief period of time the properties are used by Suburban could be more than offset by Suburban's ability to retain 100% of any gain-on-sale of the properties when no longer used per Public Utilities Code Section 789.1

D. (P-8) Sativa Customers First in Line for Water Supply Project (2028) is Unnecessary

The Commission should not include this project in rates because Suburban does not need this water storage project for the Sativa system.

Suburban requested $3,140,168 in 2028 to install two 137,000-gallon bolted steel tanks at Plant 802 with two 60 HP pumps and two 20 HP pumps.[61] Additionally,

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[59] Attachment 2-2: RESPONSE to Cal PA DR ZS1-003 (Sativa Custs. 1st Line for Water Supply Project), 9.b.i.

[60] Attachment 2-2: RESPONSE to Cal PA DR ZS1-003 (Sativa Custs. 1st Line for Water Supply Project), 9.c.

[61] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 283, lines 7-9.

Suburban plans to install an AQMD-permitted fixed emergency generator to run the pump station in the event of a Public Safety Power Shutoff (PSPS) or loss of power.[62] Suburban claims that this tank will provide critically needed operational, emergency and fire protection storage as well as simplify pressure management by matching supply demand.[63]

The Commission should not approve this project's cost on a rate base. Suburban does not need additional storage for the Sativa system because it has two wells in the system and a storage tank that can meet required flows in emergencies. Suburban has also established two independently purchased water connections with Liberty Utility and the City of Compton. Table 2-3 below shows the status and capacity of each source.

Table 2-3: Sativa District Water Supply Capacities[64]

Sources	Status	Capacity
Plant 804 (Well 3)	Active	424
Plant 803 (Well 5)	Coming online Q2, 2026	650
City of Compton Interconnection	Active	900
Liberty Utilties Interconnection	Active	1500

On April 23, 2023, DDW issued a Permit Amendment reclassifying the City of Compton interconnection to Sativa from an emergency connection to an active connection.[65] Also, when the Well-5 manganese treatment project is completed by LACPW and Suburban takes ownership, there will be an additional 650 gpm capacity

[62] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 283, lines 13-15.

[63] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 283, lines 9-13.

[64] Capacity numbers taken from Suburban Water Systems Minimum Data Requirements Response, Attachment No# 65 - SYSTEM NO. 1910147, SUBURBAN WATER SYSTEMS - SATIVA: 2025 SANITARY SURVEY, pp. 7 and 8.

[65] DDW Permit Amendment titled SYSTEM NO. 1910147: SUBURBAN WATER SYSTEMS - SATIVA, PERMIT AMENDMENT NO. 1910147PA-001 TO CHANGE THE STATUS OF THE CITY OF COMPTON INTERCONNECTION FROM EMERGENCY TO ACTIVE

flow available, as well as a 48,000-gallon storage tank on the Well-5 site. This storage tank can be used in emergencies.

Suburban states "Plant 804 Well 3 is the primary source for the Sativa water system. It produces a maximum of 424 gallons per minute (GPM) from the Central Basin. Without a storage tank, this well can meet Average Day Demand (ADD) but does not meet Maximum Day Demand (MDD), Peak Hour Demand (PHD), and fire flow."[66] Not only is this statement misleading, but Suburban also fails to acknowledge its own water system's current operational capabilities. State Water Resources Control Board's Division of Drinking Water sanitary survey report shows "The highest water usage occurred in 2023 with an MDD of 1.06 MG or 736.11 gpm. Four hours of PHD is equivalent to 0.265 MG. Well 3 and the City of Compton Interconnection are able to provide up to 1,324 gpm, which is more than enough to meet the MDD and PHD. Therefore, the Sativa water system is considered to have an adequate water supply."[67] Furthermore, when Well 5 is online, both Well 3 and Well 5 can provide 1,074 gpm, which is still more than enough to meet the MDD and PHD, which leaves Suburban's Sativa system two interconnections as redundant backup sources for emergencies.

Moreover, there is no regulation requiring Suburban to maintain water storage in its system, especially when it has multiple regular connections to purchase water. California Code of Regulations Title 22 requires public water systems with 1,000 or more service connections to meet four hours of peak hourly demand using source capacity, storage capacity, and/or emergency source connections.[68] With the addition of the 48,000 gallon storage tank, Suburban can easily meet the standards using source capacity and source connections (purchased water connections), if needed.

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[66] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 268, lines 11-13.

[67] Suburban Water Systems Minimum Data Requirements Response, Attachment No# 65 - SYSTEM NO. 1910147, SUBURBAN WATER SYSTEMS - SATIVA: 2025 SANITARY SURVEY, p. 9.

[68] California Code of Regulations Title 22 §64554 (a) (1).

Given that there is no need for Suburban to construct a new reservoir, a new pump station, a backup generator, and piping are not needed. The Commission should deny this project because Suburban does not need this water storage project for the Sativa system.

E. (P-17) Sativa Pipeline Phases 1 and 2 are Unjustified and Should be Denied

The Commission should exclude the $3,368,048 that Suburban proposed for fire-flow-related pipeline projects in 2028. Additionally, the Commission should exclude $5,355,163 for previously unauthorized spending on similar projects from the last GRC. Suburban failed to provide adequate support to justify the need for any of these projects.

In 2022, Suburban became the owner of the Sativa system. Although the previous operator (LA County Department of Public Works) made numerous improvements, Suburban claims that it identified "outstanding compliance issues" that needed to be addressed.[69] In the prior GRC,[70] Suburban stated that Sativa's current supply failed to meet fire flow requirements, the Maximum Day Demand (MDD) and Peak Hour Demand (PHD). As shown above in Section D of this chapter, Suburban can easily meet the requirements as mandated by Section 64554, Title 22 of the CCR, California Waterworks Standards.

In the prior GRC, Suburban requested $6,141,004 to complete 12 fire flow related pipeline projects. Cal Advocates argued those projects were unnecessary[71] and the Commission agreed with that recommendation.[72] Despite this, Suburban still spent $5,355,163 to complete 6 fire flow related pipeline projects, [73] identified as Sativa

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[69] A.23-01-001 SWS Workpapers: VOLUME III-D Sativa Project Proposed, p. 2.

[70] A.23-01-001.

[71] A.23-01-001 (CONFIDENTIAL) Public Advocates Office Report on Pipeline Replacement and Ratebase, Chapter 4.

[72] Decision 24-12-030 December 19, 2024, PDF, pp. 113-114.

[73] Suburban's Results of Operation Model, Tab: "MODEL", Table 6-1B, addition of cells K3867+L3867+M3867 = $5,355,163.

Pipeline Phase 1.[74] For context, Suburban spent 87% of the original estimate to complete half of what it said it could do if the budget was authorized, and it now requests that it be put into the rate base. Suburban now requests an additional $3,389,773[75] in this GRC to complete seven fire flow related pipeline projects.[76] This increases the original estimate from the last GRC, already over budgeted by approximately 42%.

In this GRC, Suburban states that the Sativa system "fail[s] to meet Los Angeles County Fire Department's minimum fire flow requirements, contributing to elevated fire risk in this densely populated residential area."[77] Suburban's assertion that the Sativa system cannot meet its fire flow requirements is misleading. LA County Department of Public Works has already constructed two separate 8-inch pipelines (Paulsen Avenue Waterline and Lucien Waterline[78]) that bring enough pressure to the system to address fire flow issues.

Suburban failed to explain how much improvement has occurred within the system after completing the unauthorized six fire flow related projects. Suburban claims "Each section of pipe replaced was strategically selected to relocate water mains out of backyards and alleys into the public right of way adjacent to streets."[79] Suburban also installed additional hydrants to facilitate these pipeline replacements. None of this explains what actual improvement these specific pipeline replacements made in the Sativa system, which could not have been achieved by installing upgraded hydrants,

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[74] Direct Testimony of Jorge Lopez (Confidential Version), at PDF pages 433-434. Sativa completed (1) Stockwell, (2) Vesta, (3) Willowbrook, (5) Wilmington, (10) W. Willowbrook, and (11) E. Willowbrook fire flow related pipeline projects.

[75] Suburban's Results of Operation Model, Tab: "MODEL", Table 6-1B, addition of cells L3868+P3867 = $3,389,773.

[76] Direct Testimony of Jorge Lopez (Confidential Version), at PDF page 441, lines 16-19. (4) Hatchway Jack & Bore, (6) Wayside, (7) Vesta, (8) Lucien, (9) Stockwell, (12) 138th, and (13) 139th

[77] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 431, lines 20-22.

[78] Full Permit, Engineering Report Los Angeles County Public Works – Sativa Water System, System No. 1910147, p. 19-20. (Dated December 23, 2020)

[79] Attachment 2-3: Responses to A.26-01-001, Public Advocates Office DR ZS1-002 (Sativa Pipeline Replacement Phase 2)), 2. c.

which Suburban already installed as part of last GRC. As pointed out earlier, these projects were unnecessary in the last GRC as decided by the Commission, and they are still unnecessary now in this GRC. So, the Commission should not include these in rates. Suburban also did not quantify how much of a significant improvement it anticipates seeing in the Sativa system after it completes the additional seven fire flow related projects it requested in this GRC. Suburban is essentially replacing segments of pipeline to upsize them from the existing configuration and install upgraded hydrants, which does not explain what improvements it will see in Sativa system.[80] At this point all these pipeline replacements only point to redundancy that ratepayers are expected to pay for without receiving any additional benefits. Suburban has also not made it clear whether there will be any further pipeline related projects requested in a future GRC which ratepayers have to carry the cost for.

Furthermore, it should be noted that Suburban is compliant with General Order 103-A's (GO-103-A) fire flow requirements because it took over an existing system, Sativa. GO-103-A states "The utility shall not be responsible for modifying or replacing at its expense any existing facilities, which are otherwise adequate, to provide increased fire flow or duration due to changes in the standards after the initial construction."[81]

Suburban has already completed a significant number of fire-hydrant replacements and installed new hydrants since the last GRC, and intends to do more replacements and new installations, including the Sativa system.[82] According to Suburban, fire hydrants are essential for active fire protection, offering firefighters immediate access to pressurized water to prevent extensive structural damage. Beyond emergencies, fire hydrants serve as vital utility tools for flushing water mains, providing temporary water

[80] Attachment 2-3: Responses to A.26-01-001, Public Advocates Office DR ZS1-002 (Sativa Pipeline Replacement Phase 2)), 3. c.

[81] General Order (GO) 103-A, Section VI, 3. Replacement of Mains: A. Changes to Fire Code.

[82] Attachment 2-3: RESPONSE to Cal PA DR ZS1-002 (Sativa Pipeline Replacement Phase 2), Q 5.

during repairs, and monitoring system health through flow tests and pressure tracking.[83] So, by its own standards, Suburban is already making enough progress in the Sativa system to make it more resilient to fire flow events.

Division of Drinking Water (DDW) in its latest Sanitary Survey noted that Sativa system did not perform enough dead-end flushing since 2023, and the total flushing within the system is significantly down since Suburban took ownership from LADPW in 2022.[84] Dead-end flushing ensures fire hydrants are operational and provides the pressure and flow rates necessary for emergencies. By clearing water mains and verifying system capacity, operators maintain the infrastructure required for efficient, high-volume water delivery during a fire.[85]

DDW in its report also noted that the Sativa system has 160 valves ranging from 4 to 8 inches. As of April 2026, that number has increased to 213 valves in Sativa system.[86] Suburban states that its valve program exercises the valves every 4 years. Valve exercising involves the manual or automatic opening and closing of valves to ensure they continue to function properly. This process is crucial for maintaining the integrity of water and wastewater systems. In 2024, 14 new valves were installed. However, none of the existing 146 valves in 2024 were exercised. The last exercise according to DDW and Suburban was done in 2023. Suburban claims DDW agreed to a 4-year exercise-cycle, which Suburban failed to provide any evidence of support. Ideally, all valves should be exercised annually, as noted by DDW.[87] Effective valve maintenance ensures fire protection systems deliver the pressure and flow necessary to protect lives and property. Regular upkeep, including routine inspections, fire pump no-flow tests, and gauge

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[83] Direct Testimony of Jorge Lopez (Confidential Version), at PDF, p. 431, lines 93-94.

[84] Suburban Water Systems Minimum Data Requirements Response, Attachment No# 65 - SYSTEM NO. 1910147, SUBURBAN WATER SYSTEMS - SATIVA: 2025 SANITARY SURVEY, p. 15.

[85] Water Main Flushing - Fact Sheet - FAQ for Consumers (accessed on 3/15/2026).

[86] Attachment 2-3: RESPONSE to Cal PA DR ZS1-002 (Sativa Pipeline Replacement Phase 2), Q 8.

[87] Suburban Water Systems Minimum Data Requirements Response, Attachment No# 65 - SYSTEM NO. 1910147, SUBURBAN WATER SYSTEMS - SATIVA: 2025 SANITARY SURVEY, p. 15-16.

pressure checks—prevents backflow and help guarantee that control valves and alarm devices respond instantly during an emergency. By maintaining these components, the system remains reliable and ready to suppress a fire before it spreads.[88]

DDW notes that a system pressure of 60 to 70 pounds per square inch (psi) is maintained in the distribution system[89], which is a single-pressure zone system. Along with the sources of capacity discussed in Section D of this chapter, Suburban system is designed to have enough fire flow capacity in the system to tackle any fire flow emergencies. The Commission should not approve these projects that are unnecessary and will harm Sativa customers through rate increases.

IV. CONCLUSION

The Commission should not adopt Suburban's recommendations for the Sativa projects because they are not just and reasonable. Instead, it should adopt Cal Advocates' recommendations because they include only necessary costs that will be used and are useful.

- Well-5 Manganese treatment should be approved into rates with $3,603,354 in 2026. $324,302 of unjustified additions should not be included in rates.
- Well-4 Bolted Reservoir (300,000 gallons) should not be included in rates because the reservoir was not built and not required for the system.
- Sativa Water System Land Purchase should not be included in rates because these parcels of land are not needed and won't be used and useful.
- Sativa Customers First in Line for Water Supply Project should not be included in rates because Suburban does not need this water storage project for the Sativa system.
- Sativa Pipeline Phases 1 and 2 should not be included in rates because Suburban does not need these pipeline projects.

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[88] Fire Protection Valves - Ensuring Safety and Reliability in Firefighting Systems (accessed on 3/15/2026).

[89] Suburban Water Systems Minimum Data Requirements Response, Attachment No# 65 - SYSTEM NO. 1910147, SUBURBAN WATER SYSTEMS - SATIVA: 2025 SANITARY SURVEY, p. 10.

Appendix A:

Qualifications of Witness

QUALIFICATIONS AND PREPARED TESTIMONY
OF
ZAVED SARKAR

Q.1 Please state your name and address.

A.1 My name is Zaved Sarkar, and my business address is 505 Van Ness Avenue, San Francisco, CA 94102.

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

A.2 I am employed by the Public Advocates Office – Water Branch and my job title is Utilities Engineer.

Q.3 Please describe your educational and professional experience.

A.3 I received a Bachelor of Science Degree in Electrical and Electronic Engineering from the American International University – Bangladesh (AIUB) in 2010. I also earned a Master of Science Degree in Electrical and Electronic Engineering from California State University, Sacramento in 2019. I have been with the Public Advocates Office – Water Branch since October of 2017.

Q.4 What is your area of responsibility in this proceeding?

A.4 I am responsible for the preparation of Cal Advocate's testimony on Plant projects for Whittier-La Mirada and Sativa Systems.

Q.5 Does that complete your prepared testimony?

A.5 Yes, it does.

Appendix B:

Supporting Attachments

1 **LIST OF ATTACHMENTS FOR APPENDIX B**

Attachment #	Title
Attachment 1-1	RESPONSE to Cal PA DR ZS1-004 (Stage Rd Well) PDF Files: DR ZS1-004 #1.b.i Test Well Invoices DR ZS1-004 #1.b.iii Production Well Invoices DR ZS1-004 #3.b Test Well Destruction Cost DR ZS1-004 #5.b.i Plant 429 Discharge Line Excel Files: DR ZS1-004 #1.b.ii PV Calculation DR ZS1-004 #1.b.iii_Production Well Cost Summary DR ZS1-004 #1.b.iv Well Piping Equipping Cost Estimate DR ZS1-004 #1.b_Test Well Cost Summary DR ZS1-004 #6.a Cost Benefit Analysis (PDF and Excel Files Available via Email)
Attachment 1-2	RESPONSE to Cal PA DR ZS1-005 (Well Drilling & Equipping at Plant 216) PDF Files: DR ZS1-005 #1_Land Lease Agreement DR ZS1-005 #2.a_Plant 216 Test Well Invoices DR ZS1-005 #8.a.ii.1 Plant 211 Study DR ZS1-005 #8.a.ii.2 Plant 211 Map Excel Files: DR ZS1-005 #2.a_Plant 216 Test Well Cost Report DR ZS1-005 #2.b_Plant 216 Cost Estimate DR ZS1-005 #4_Plant 216 Cost Estimate Alternative 3 DR ZS1-005 #5_Plant 216 Cost-Benefit Analysis Alternative 3 DR ZS1-005 #6_Plant 216 Cost Estimate Alternative 4 DR ZS1-005 #7_Plant 216 Cost-Benefit Analysis Alternative 4 (PDF and Excel Files Available via Email)

Attachment #	Title
Attachment 2-1	RESPONSE to Cal PA DR ZS1-001 (Sativa Manganese Treatment), PDF Files: DR ZS1-001 #1.a County of LA Sativa MOU DR ZS1-001 #1.b - LA County Notification_02.14.23 DR ZS1-001 #1.c Sativa_Att5_Budget DR ZS1-001 #1.d - Progress_Payment_31_December_2025-APPROVED DR ZS1-001 #1.g Metro Builders Schedule DR ZS1-001 #1b - LA County_07.31.25 DR ZS1-001 #2.a - SCE Schedule DR ZS1-001 #3.b WQ Reports Excel Files: DR ZS1-001 #1.b _LA County_Cost Estimates (PDF and Excel Files Available via Email)
Attachment 2-2	RESPONSE to Cal PA DR ZS1-003 (Sativa Custs. 1st Line for Water Supply Project) PDF Files: DR ZS1-003 #2.a Compton PFAS Notice DR ZS1-003 #2.b WQ Report DR ZS1-003 #4 Liberty Agreement DR ZS1-003 #6.a Plant 803 Tank Exhibit DR ZS1-003 #9.a CLOSING PACKAGE DR ZS1-003 #9.a Escrow email DR ZS1-003 #9.a Grant Deed Excel Files: DR ZS1-003 #5.b Pump HP Calculations DR ZS1-003 #5.c Cost Estimate (PDF and Excel Files Available via Email)
Attachment 2-3	RESPONSE to Cal PA DR ZS1-002 (Sativa Pipeline Replacement Phase 2)

Attachment #	Title
	PDF Files: 1c. ZS1-002 - Sativa #1 1c. ZS1-002 - Sativa #2 DR ZS1-002 - 2.b – Proposal DR ZS1-002 #4 Change Order 8 DR ZS1-002 2.b - Final Invoice DR ZS1-002 9A Response - Fire Flow 8969 DR ZS1-002 9A Response - Fire Flow 8979 Excel Files: DR ZS1-002 - 2.a - East Closing DR ZS1-002 - 2.a. - West Closing DR ZS1-002 2A Response - Sativa Pipeline DR ZS1-002 3A Response - Phase 2 Cost Estimate DR ZS1-002 9A Response - Phase 2 Existing (PDF and Excel Files Available via Email)

Attachment 1-1

RESPONSE to Cal PA DR ZS1-004
(Stage Rd Well)

CONFIDENTIAL

(Available via Email)

Note: Due to file size, the data request response attachment documents are available via Kiteworks

March 30, 2026

To: Zaved Sarkar
Utilities Engineer

Suliman Ibrahim
Project Coordinator

Corwin Hockema
Attorney for Public Advocates Office

Re.: Responses to A.26-01-001, Public Advocates Office DR ZS1-004 (Stage Road Well Piping and Equipping)

Dear Mr. Sarkar et al.,

Attached is the information you requested in writing for Suburban's Total Company General Rate Case.

Sincerely,

/s/Carmelitha Bordelon

Carmelitha Bordelon
Vice President, Regulatory Affairs & Finance

Responses to A.26-01-001, Public Advocates Office

DR ZS1-004 (Stage Road Well Piping and Equipping)

1. On PDF page 1442-1462, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban provides a property agreement with City of La Mirada, of which an excerpt is below. **<<BEGIN CONFIDENTIAL>>**

<<END CONFIDENTIAL>>

a. Provide the reference to Suburban's RO workpapers to show how the cost of the lease is captured: expense going forward, or rate base.

Response:

The lease expense for the property was inadvertently omitted from the RO Model under CPUC account 811 subaccount 210. The land lease costs are treated as operating expenses and are not included in the rate base as shown on the cost estimate on page 305 of the Direct Testimony of Jorge Lopez.

b. Regarding the cost estimate breakdown above which is posted on PDF page 1440, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION): <<**BEGIN CONFIDENTIAL>>**

<<END CONFIDENTIAL>>

i. Provide documentation to verify the recorded cost of <<**BEGIN CONFIDENTIAL>>** [redacted] **<<END CONFIDENTIAL>>** including but not limited to vendor invoices, internal labor hours, etc. for the Test Well in 2022.

Response:

Enclosed with this data request is a copy of the closing summary detailing the project costs, titled DR ZS1-004 #1.b_Test Well Cost Summary. The summary shows minimal internal labor of $746.46 because the work was performed by a third-party consultant.

Also enclosed are the invoices requested in the file titled DR ZS1-004 #1.b.i Test Well Invoices.

ii. Provide documentation and explain how Suburban calculated **<<BEGIN CONFIDENTIAL>>** [redacted] **<<END CONFIDENTIAL>>**included as the Land Lease in 2024. Please provide reference to Suburban RO workpapers to show how the cost of the land lease is captured: expense going forward, or rate base.

Response:

The previous Present Value (PV) calculation of $435,056 was subsequently revised. Enclosed with this data request is the revised PV and lease liability calculation, titled "ZS1-004 #1.b.ii." The updated PV amount is $670,434.08.

As noted in response to question 1.a, the associated lease costs would have been included in the expense CPUC account 811 subaccount 210. Accordingly, these costs are not included in rate base.

iii. Provide documentation to verify the recorded cost of **<<BEGIN CONFIDENTIAL>>** [redacted] **<<END CONFIDENTIAL>>** including but not limited to vendor invoices, internal labor hours, etc. for the Production Well in 2024.

Response:

Enclosed with this data request is a copy of the closing summary detailing the project costs, titled "DR ZS1-004 #1.b.iii_Production Well Cost Summary.xlsx." The summary shows no internal labor because the work was performed by a third-party consultant.

Also enclosed are the invoices requested in the file titled "DR ZS1-004 #1.b.iii Production Well Invoices."

iv. Provide documentation to verify the anticipated cost of <<**BEGIN CONFIDENTIAL**>> [redacted] <**END CONFIDENTIAL**>> including but not limited to vendor invoices/bids, internal labor hours, work orders, etc. for the Well Piping and Equipping in 2026.

Response:

Enclosed with this data request is a copy of the Well Equipping & Piping Cost Estimate, in Excel format, title "ZS1-004 #1.b.iv Well Piping Equipping Cost Estimate." The cost estimate includes the consultant's cost estimate for construction, design, and inspection services.

2. On PDF page 306, lines 22-23 of the DIRECT TESTIMONY OF JORGE LOPEZ, Suburban states "The total project cost increased from $8,000,310 in the previous rate case filing to $10,228,579."

   a. Please provide a breakdown of what cost items increased to substantiate the increase.

      Response:

      The costs incurred to date for the completed work identified in the prior rate case are lower than originally estimated, as shown in the cost summary table below. The primary driver of this reduction was the production well drilling portion of the project, which came in $1,046,640 (33.05%) below the original estimate.

      The overall project cost increase is attributable to the remaining work yet to be completed, including equipping the well and constructing the utilities and pipeline necessary to produce and convey water for customer use. As noted in the Direct Testimony of Jorge Lopez (Page 304, Line 26), the original cost estimate was prepared in 2022. Since that time, construction-related inflation has increased significantly. Further delays in completing this project will continue to escalate costs to customers.

Description	2023 Filing	2026 Filing	Difference	% Change
Test Well	1,079,754	1,283,067	203,313	15.85%
Land Lease	439,488	435,056	(4,432)	-1.02%
Production Well	**4,213,683**	**3,167,043**	**(1,046,640)**	**-33.05%**
Subtotal	5,732,925	4,885,166	(847,759)	-17.35%
Well Piping and Equipping	2,267,385	5,343,413	3,076,028	57.57%
Total	8,000,310	10,228,579	2,228,269	21.78%

3. On PDF page 1749, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban included the "Appendix 3 - Results of Drilling, Construction, Development and Testing Well No. 429-W1 (April 24, 2025)". Section 6 of this report talks about the destruction of the Test Well.

   a. Has the Test Well been demolished?

      Response:

      Yes, the test well was destroyed.

      i. If so, when was it demolished?

         Response:

         The well destruction work began on 8/12/2024 and ended 8/21/2024 as shown on page 2058 of Workpapers Volume III.

      ii. If not, when is it scheduled to be demolished?

Response:

See response to question 3.a, above.

b. Provide a detailed cost estimate for the destruction of the Test Well at Stage Road site.

Response:

Enclosed with this data request is a copy of the contractor's cost for destroying the test well, titled "DR ZS1-004 #3.b Test Well Destruction Cost."

c. Please provide a reference to Suburban RO workpapers to show how the cost of the test well destruction is captured: expense going forward, or rate base.

Response:

The cost of the test well destruction is reflected as follows:

- In file titled "DR ZS1-004 #1.b.iii_Production Well Cost Summary.xlsx" cell B31. This cost is recorded as part of the overall production well project costs.
- The corresponding inclusion of this cost in rate base is reflected in the RO Model as a utility plant addition in 2024. Specifically, the total production well cost of , $3,167,043 is shown in cell L4159.

The costs associated with the destruction of the test well were incurred as part of the production well drilling project, as discussed in response to Question 1.b.iii. The test well was destroyed in connection with the construction and completion of the production well. Destruction of the test well was required prior to drilling the production well in accordance with the requirements of the California Department of Water Resources (DWR). https://water.ca.gov/Programs/Groundwater-Management/Wells/Well-Standards/Combined-Well-Standards/Water-Destruction

DWR requires the abandonment of nearby wells to prevent the creation of preferential pathways that could degrade water quality or cause cross-contamination between aquifers. Wells located in proximity can facilitate the vertical migration of contaminants if not properly destroyed. The Plant 429 test well was screened from top to bottom to evaluate water quality across multiple aquifers. Due to this full-length screening, the test well posed a risk of introducing contaminants into the specific screened intervals of the production well, which are designed to avoid poor-quality water. Accordingly, destruction of the test well was necessary to comply with regulatory requirements and protect groundwater quality.

4. Provide the description and capacity of the existing treatment facilities at Plant 409. Explain what type of treatment is available at Plant 409 for each contaminant.

Response:

Plant 409 has a well referred to as 409 W-3 which has a maximum pumping capacity of 1,200 gpm. The treatment process includes, a sodium hypochlorite (12.5% solution) dosing point, two reaction vessels, FeCl3 (40%) dosing point, two Electromedia filtration vessels, three chlorine analyzers, Liquid Ammonium Sulfate (LAS) (40% solution) dosing for chloramination, and a 70,000-gallon backwash tank. The treatment capacity is 2,500 gpm. Treated water from the treatment plant enters the water system directly. The plant also has a pump station with four booster pumps with suction from a 1.5-MG storage reservoir.
The flow from 409 W-3 is dosed with sodium hypochlorite prior to the reaction vessels to oxidize As(III) to As(V), oxidize color and iron, remove natural ammonia, provide oxidant for the Filtronics Electromedia to remove manganese, and provide a disinfectant residual. A chlorine analyzer is used to confirm hypochlorite addition, acknowledging that the chlorine residual will fluctuate due to demand in the water and the proximity of the location to the dosing location. The water flows through the reaction vessels and is dosed with FeCl3 before the filtration vessels to coagulate As(V). Filtronics Electromedia is used to filter coagulated particles and catalytically remove manganese, treating the arsenic to concentrations below 8 µg/L, which is 80 percent of the MCL, and removing iron and manganese. Following filtration and prior to entering the distribution system, the water is analyzed for chlorine and dosed with LAS. Chlorine residual is also be analyzed after the LAS dosing.
Filters are backwashed on a time basis every 24 hours using water from the storage reservoir. During filter backwashing, the spent backwash water flows to the onsite reclaim tank. The backwash is stored in a reclaim tank that mixes the backwash to provide a consistent quality waste stream to the sewer.

5. On PDF page 2076, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban included the "Appendix 4 - Hazen Water Quality Analysis (Dated October 21, 2025)". Section 2 talks about the water quality sampling from Well 429-W1.
   a. Hazen's report states that **<<BEGIN CONFIDENTIAL>>** [redacted] **<END CONFIDENTIAL>>**
      i. When was this sampling conducted?

         Response:

         Sampling was performed and submitted to the lab on 12/4/2024 as shown on page 2145 of WORKPAPERS VOLUME III CONFIDENTIAL.

      ii. Has Suburban conducted any more sampling to test the water quality of Well 429-W1?
         1. If yes, please provide documentation on the latest water quality sampling data.

Response:

No, additional tests are not required.

2. If not, please explain why Suburban hasn't collected any more water quality samples.

   Response:

   Suburban's Plant 429 Well Project has required innovative, thorough planning, design, and construction to ensure we can serve our customers with a safe and reliable water supply. Suburban partnered with Intera Incorporated an international geosciences and engineering consultant company specializing in environmental projects such as Plant 429. Intera recommended performing well profiling during the test well phase due to the history of contaminants in the water quality in the central basin, such as PFAS, iron and manganese, arsenic, and color. Well profiling collects hydraulic conductivity and water quality data at various depths to improve well design. As noted on page 285 of the Direct Testimony of Jorge Lopez, the test well showed acceptable water quality and capacity. The sample obtained on 12/4/2024, and analyzed by Hazen and Sawyer, was a confirmation sample of the results that have been thoroughly evaluated during the test well phase and Suburban has confidence that the water produced from this well will meet water quality standards.

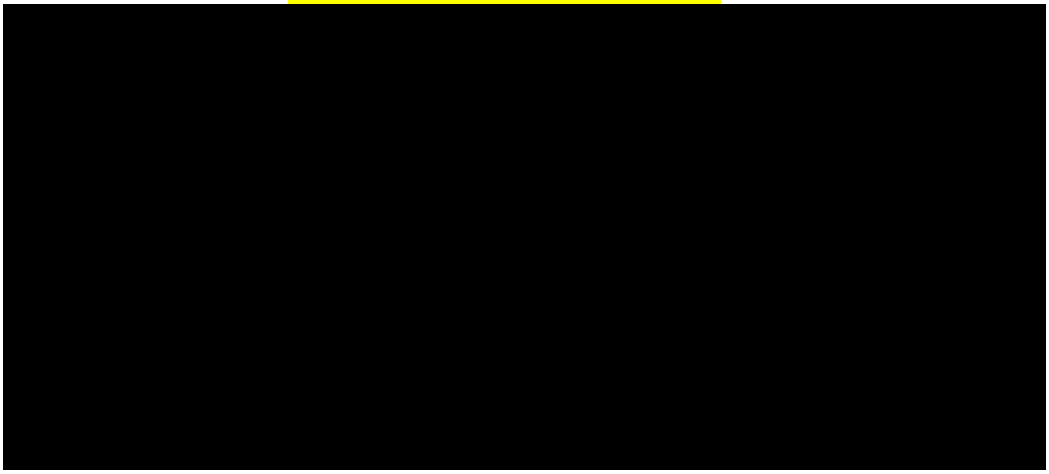
b. On Section 4 of the Hazen's report, it states that **<<BEGIN CONFIDENTIAL>>** [redacted] **<END CONFIDENTIAL>>**

   i. What plans, if any, have Suburban taken to potentially tackle iron and manganese precipitation issues at the interconnecting pipelines when 409 and 429 are being blended? Please explain in detail with supporting documentation.

      Response:

      The image below marked as confidential is Figure 2: Proposed Discharge Piping from Stage Rd Well to Plant 409, as on page 293 of the Direct Testimony of Jorge Lopez. The image is the 60% design piping plans. The appurtenances in the red boxes are blow-offs proposed at two local low points in the pipeline where Manganese precipitation will accumulate. The blow-offs will be installed so that a routine flushing schedule is developed. The Plant 429 Discharge line plans are enclosed with this data request, titled ZS1-004 #5.b.i Plant 429 Discharge Line for clarity of the blow off call outs.

<<BEGIN CONFIDENTIAL>>



<<END CONFIDENTIAL>>

ii. What additional costs, if any, do Suburban anticipate would incur if such events of iron and manganese accumulation need to be handled during the full operations of both Well 429-W1 and Well 409. Please explain in detail with supporting documentation.

Response:

No additional costs will be incurred. Suburban's existing water quality staff will incorporate flushing this pipeline into their existing flushing plan.

iii. What additional costs, if any, do Suburban anticipate would incur if more maintenance and flushing are required due to accumulation of iron and manganese along the interconnecting pipelines. Please explain in detail with supporting documentation.

Response:

No additional costs will be incurred. See response to question 5.b.ii, above.

6. On PDF page 2313, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban included the "Appendix 7 - Plant 429 Cost Benefit Analysis".

a. Please provide an excel version of this cost benefit analysis with all links and formulas intact.

Response:

Enclosed with this data request is a copy of the cost benefit analysis, titled DR ZS1-004 #6.a_Cost Benefit Analysis.

Attachment 1-2

RESPONSE to Cal PA DR ZS1-005 (Well Drilling & Equipping at Plant 216)

CONFIDENTIAL

(Available via Email)

Note: Due to file size, the data request response attachment documents are available via Kiteworks

March 24, 2026

To: Zaved Sarkar
Utilities Engineer

Suliman Ibrahim
Project Coordinator

Corwin Hockema
Attorney for Public Advocates Office

Re.: Responses to A.26-01-001, Public Advocates Office DR ZS1-005 (Well Drilling & Equipping at Plant 216)

Dear Mr. Sarkar et al.,

Attached is the information you requested in writing for Suburban's Total Company General Rate Case.

Sincerely,

/s/Carmelitha Bordelon

Carmelitha Bordelon
Vice President, Regulatory Affairs & Finance

Responses to A.26-01-001, Public Advocates Office

DR ZS1-005 (Well Drilling and Equipping at Plant 216)

1. In previous GRCs, Suburban explained that Plant 216 ownership had been turned over to Cal Domestic via a land swap to construct Plant 224. During the 02/23/2026 - 02/24/2026 Suburban 2026 District Tour, Suburban seemed to indicate Plant 216 as still owned by Suburban. Please clarify the current ownership status of Plant 216. Provide any documentation to support Suburban's claim.

   Response:

   As noted in Responses to A.23-01-001, Public Advocates Office DR BYU-03 (Plant 216), Suburban remains the property owner of Plant 216. As noted in the March 25, 2013 letter from Raminder Kahlon, Director of Division of Water and Audits, Suburban became aware of deed restrictions that prohibit the land exchange. When the land exchange was not possible Suburban entered into a land lease agreement with Cal Domestic. For the copy of the land lease agreement, please see file titled "DR ZS1-005 #1_Land Lease Agreement.pdf."

   Suburban intends to remove the deed restrictions and exchange the properties as agreed. As noted in the letter, there is a discrepancy in the sizes of the lots being exchanged, and Suburban intends to modify the lot lines to carve out property for the well and treatment equipment planned for Plant 216, reducing the difference in lot sizes.

2. Regarding the cost estimate, which is posted on PDF page 2476, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION):

   <<BEGIN CONFIDENTIAL>>

   [redacted]

   <<END CONFIDENTIAL>>

   Provide documentation to verify the recorded cost of **<<BEGIN CONFIDENTIAL>>** [redacted] **<<END CONFIDENTIAL>>**

   a. including but not limited to vendor invoices, internal labor hours, etc. for the Test Well in 2025.

      Response:

Please see file titled "DR ZS1-005 #2.a_Plant 216 Test Well Cost Report.xlsx" for the recorded cost summary of the Test Well, and file titled "DR ZS1-005 #2.a_Plant 216 Test Well Invoices.pdf" for the supporting invoices. Suburban inadvertently omitted the 2023 permitting costs and only included the 2025 costs of $702,596. The actual recorded cost, including these permitting costs, is $786,170.29.

b. Provide documentation to verify the anticipated cost of **<<BEGIN CONFIDENTIAL>>** [redacted] **<<END CONFIDENTIAL>>** including but not limited to vendor invoices/bids, internal labor hours, work orders, etc. for the Well Piping and Equipping in 2028.

Response:

The anticipated cost of $3,606,894 in 2028 is for the Plant 216 Production Well, not the Well Piping and Equipping. The Well Equipping, Piping and Treatment is scheduled in 2029. The supporting documentation is included in the Plant 429 Production Well Drilling Cost sheet, in Workpapers Volume III, P-12, Appendix 5. To provide additional transparency, Suburban is including with this data request the Excel file with various tabs that contain the information provided in the workpapers. See file titled "DR ZS1-005 #2.b_Plant 216 Cost Estimate.xlsx." The "Production Well" sheet contains the formulas used for the Plant 216 production well cost estimate.

c. Provide documentation to verify how the anticipated cost of **<<BEGIN CONFIDENTIAL>>** [redacted] **<<END CONFIDENTIAL>>** was developed, including but not limited to vendor invoices/bids, internal labor hours, work orders, etc. for the Well Equipping, Piping and Treatment in 2029.

Response:

The anticipated cost for the Well Equipping, Piping, and Treatment is $6,274,153, not $5,343,413. Workpapers Volume III, P-12, Appendix 5 shows a detailed line-item breakdown of how the anticipated cost of $6,274,153 was developed. To provide additional transparency Suburban is including with this data request the Excel file with various tabs that contain the information provided in the workpapers. See file titled "DR ZS1-005 #2.b_Plant 216 Cost Estimate.xlsx." The Well_Equipping_Piping_Treatment sheet contains the formulas used for the cost estimate.

3. On PDF page 2476, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban states "The total project cost estimate increased by **<<BEGIN CONFIDENTIAL>>** [redacted] **<<END CONFIDENTIAL>>** from 2022 to 2025."

a. Please provide a breakdown of which cost items increased and substantiate the increase.

Response:

The cost items that increased from 2022 to 2025 were the well equipping, piping, and manganese treatment. The cost estimate in Workpapers Volume III, P-12, Appendix 5 shows the subtotals for the well equipping, yard piping, and treatment plant in 2025. These subtotals exclude engineering services and inspection costs and general administration markups. Compared with the subtotals for the same cost items in the 2022 cost estimate, the anticipated costs for these items increased significantly in 2025. As mentioned on page 359 of the DIRECT TESTIMONY OF JORGE LOPEZ, the increase is primarily due to significant construction inflation from 2022 to 2025.

4. On PDF page 2643, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban included the "Appendix 5 - Cost Estimate for Recommended Alternative 3".

    a. Please provide an Excel version of the cost estimates in this appendix with all links and formulas intact.

    Response:

    Please see file titled "DR ZS1-005 #4_Plant 216 Cost Estimate Alternative 3.xlsx."

5. On PDF page 2710, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban included the "Appendix 6 - Cost-Benefit Analysis for Recommended Alternative 3".

    a. Please provide an Excel version of the cost-benefit analysis in this appendix with all links and formulas intact.

    Response:

    Please see file titled "DR ZS1-005 #5_Plant 216 Cost-Benefit Analysis Alternative 3.xlsx."

6. On PDF page 2712, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban included the "Appendix 7 - Cost Estimate for Alternative 4 (Without Manganese Treatment)".

    a. Please provide an Excel version of the cost estimates in this appendix with all links and formulas intact.

    Response:

    Please see file titled "DR-ZS1-005 #6_Plant 216 Cost Estimate Alternative 4.xlsx."

7. On PDF page 2714, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban included the "Appendix 8 Cost - Benefit Analysis for Alternative 4 (Without Manganese Treatment)".

a. Please provide an Excel version of the cost-benefit analysis in this appendix with all links and formulas intact.

Response:

Please see file titled "DR-ZS1-005 #7_Plant 216 Cost-Benefit Analysis Alternative 4.xlsx."

8. On PDF page 2714, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban included the "Appendix 9 - KYLE Groundwater Plant 216 Test Well Report". **<<BEGIN CONFIDENTIAL>>**

<<END CONFIDENTIAL>>

i. Did Suburban test the test well drilled in Plant 216 to figure out if it can produce support an estimated 1,000 to 1,500 GPM production well? Provide documentation substantiating that the proposed well can produce 1,000 gpm as suggested on PDF page 354 of the DIRECT TESTIMONY OF JORGE LOPEZ.

Response:

Yes, Suburban did test the well drilled in Plant 216 in 2025 to determine an estimated production capacity of a production well. Suburban's hydrogeologist, KYLE Groundwater, concluded from the testing results that a production well at Plant 216 can produce an estimated 1,000 to 1,500 GPM. In KYLE Groundwater's Plant 216 Test Well Report (Workpapers Volume III, P-12, Appendix 9), the Conclusions and Recommendations section notes that, "The results of exploratory drilling and testing at Plant 216, along with the available records regarding Plant 231 W-1, suggest moderately productive aquifers in the vicinity of Plant 216. As such, it is anticipated that a properly designed and constructed well in this area would be capable of producing

approximately 1,000 to 1,500 GPM, depending on local variations in aquifer conditions."

ii. On PDF page 1431, of the WORKPAPERS VOLUME III CONFIDENTIAL (FINAL APPLICATION), Suburban suggests there was another exploratory well site at Plant 211 which was drilled in 2018.

1. Provide any study or report that was conducted regarding this exploration well at Plant 211 and if any production was measured.

   Response:

   As noted in Responses to A.23-01-001, Public Advocates Office DR BYU-03 (Plant 216), Production from the Plant 211 test well was measured during the well development and anticipated production was estimated by the hydrogeologist as noted on Section 10.1 of the study. Please see file titled "DR ZS1-005 #8.a.ii.1 Plant 211 Study.pdf."

2. Please indicate where Plant 211 is located on Suburban's WLM system map and show how close Plant 211 is to Plant 216 site.

   Response:

   As noted in Responses to A.23-01-001, Public Advocates Office DR BYU-03 (Plant 216 Plant 211 is located one mile southeast of Plant 216 as shown in file titled "DR ZS1-005 #8.a.ii.2 Plant 211 Map.pdf".

3. Explain why only an exploration well was constructed at Plant 211, but not a production well.

   Response:

   As noted in Responses to A.23-01-001, Public Advocates Office DR BYU-03 (Plant 216), Treatment and blending were required to address high levels of TDS and manganese at Plant 211. The Plant 211 site is not large enough for a manganese removal treatment plant and a tank to blend down TDS. Construction of a new tank and transmission line was required and estimated to be more costly than building a well at Plant 216.

b. On page 6 of this report, a summary of the water quality results is shown for the test well at Plant 216 MW for the shallow, middle, and deep well (designated MW-1S, MW-1M, and MW-1D) depths of 516, 620, and 856 feet bgs, respectively. Test results for MW-1S and MW-1D show elevated levels for several constituents.

i. The conclusion section of the report suggests that Suburban can avoid installing treatment for MBAS, TDS and Manganese and several constituents of PFAS by using the production well at middle (or MW-1M) depth. Please provide

supporting explanation as to why Suburban is suggesting a future treatment(s) at Plant 216 test well site?

Response:

Suburban's conceptual design of the Plant 216 production well will draw water from the middle and deep aquifers. This design balances water quality with production capacity goals. The production well would not reach the desired production capacity of 1,000 GPM if it only produced from the middle aquifer. On page 360of the DIRECT TESTIMONY OF JORGE LOPEZ, only treatment for manganese was recommended. The other constituents could be blended at Plant 224. Blending without treatment is insufficient for manganese, as explained in the Alternative 4 section on pages 360-361 of the DIRECT TESTIMONY OF JORGE LOPEZ and reproduced below for convenience:

> "According to the blending calculation, manganese would be blended down from 86 µg/L to 15 µg/L, just shy of the Department of Drinking Water's (DDW) health protective concentration (HPC) of 20 µg/L. According to the State Water Resources Control Board, DDW's HPC levels serve as the basis for future recommended revisions to the current manganese notification and response levels. This means the regulatory levels for manganese could change to 20 µg/L in the future, which may render blending insufficient to reduce manganese to acceptable levels. In addition, DDW has found that exposure to high levels of manganese poses a neurotoxic risk for formula-fed infants and young children. Considering that blending manganese will only lower its concentration to slightly below the HPC level, **treatment to remove manganese from entering the system is the best alternative to avoid health risks**."

Attachment 2-1

RESPONSE to Cal PA DR ZS1-001
(Sativa Manganese Treatment)

CONFIDENTIAL

(Available via Email)

Note: Due to file size, the data request response documents are available via Kiteworks

March 17, 2026

To: Zaved Sarkar
Utilities Engineer

Suliman Ibrahim
Project Lead

Corwin Hockema
Attorney for Public Advocates Office

Re.: Responses to A.26-01-001, Public Advocates Office DR ZS1-001 (Sativa Manganese Treatment)

Dear Mr. Sarkar et al.,

Attached is the information you requested in writing for Suburban's Total Company General Rate Case.

Sincerely,

/s/Carmelitha Bordelon

Carmelitha Bordelon
Vice President, Regulatory Affairs & Finance

Responses to A.26-01-001, Public Advocates Office

DR ZS1-001 (Sativa Manganese Treatment)

1. In direct testimony of Jorge Lopez, Suburban stated<<BEGIN CONFIDENTIAL>> [redacted]. <<END CONFIDENTIAL>>(Lopez Direct Testimony CONFIDENTIAL PDFA corrected, page 164, lines 9-12)
    a. Please provide a copy of the agreement for the funding ($2.2M) that was granted for this project.
    Response:
    Enclosed with this response to the data request is the Memorandum of Understanding (MOU) for the Sativa LA County Water District Water Quality Improvement project between the County of Los Angeles (Local Project Sponsor) and Los Angeles County Flood Control District (LACFCD). LACFCD is designated as the regional entity responsible for applying for grants, administering and managing grant funds, and providing oversight. The Sativa LA County Water District Water Quality Improvement project is one of multiple projects part of the Proposition 1, Round 1 Integrated Regional Water Management (IRWM) grant. Page 1 of the MOU shows the requested amount. The MOU is titled as "DR ZS1-001 #1.a County of LA Sativa MOU."

    b. When was Suburban notified of the change in total cost of completion of the treatment plant? Please provide documentation(s).
    Response:
    The treatment plant is nearing completion, and the total project cost has not yet been determined. Suburban was first notified of the cost increase from the initial estimate on Tuesday, February 14, 2023, a day after receiving project bids. Enclosed is the email from Mr. Joon Young Jang, the contact person from LACPW. The email is titled DR ZS1-001 #1.b-LA County Notification_02.14.23. In this GRC filing, Suburban requested an updated budget from Los Angeles County Public Works (LACPW). On July 31, 2025, in the email from Mr. Joon Young Jang, he provided the most recent cost estimate, which is included on page 165 of the Direct Testimony of Jorge Lopez. The email from Mr. Yang is titled DR ZS1-001 #1.b-LA County_07.31.25. On October 17, 2025, Mr. Yang provided the following Excel sheet showing the cost summaries used to determine Suburban's remaining cost, as shown on page 165 of the Direct Testimony of Jorge Lopez. The Excel File is titled DR ZS1-001 #1.b_LA County Cost Estimate.

    c. Please provide a copy of the original cost estimates, which show all cost line items provided by LA County.

Response:
The original cost estimate of $2,365,637 from December 2019, developed by LACPW, is enclosed as "DR ZS1-001 #1.c Sativa_Att5_Budget."

d. Please provide a copy of the updated cost estimates provided by LA County. Please provide any invoices, vendor work orders, receipts, excel spreadsheets etc. that justify the cost increase.
Response:
See response to question 1.b. LA County's cost estimate is shown in the Excel File DR ZS1-001 #1.b_LA County Cost Estimate. Enclosed with this data request is also an invoice from the General Contractor, Metro Builders and Engineers Group, Ltd. Page 1 of the invoice shows the revised contract amount of $4,412,472.45 through December 31, 2025. LA County's estimate totals $4,344,446 in construction costs, with a $68,026 construction cost deficit relative to Suburban's estimate.

e. Did LA County explain what triggered the cost increases? Please provide any support documentation, email correspondence etc. from the LA County or WDR which accurately explains what triggered the cost estimates to increase.
Response:
LA County did not provide support explaining the cost increase from the 2019 estimate to the bid opening on 2/13/2023, as inflation during this period has been well-publicized. Section VI, Construction Cost Escalation of the Direct Testimony of Jorge Lopez discusses cost increases and is shown in the table on page 45.

f. Did LA County/WRD provide any detailed accounting updates about manganese treatment? If so, please provide copies of those updates.
Response:
No additional updates have been provided since October 17, 2025, as discussed in response 1.b. Suburban will receive updates when the project is completed later this year.

g. When does Suburban anticipate the LA County/WRD will provide a final accounting update with all applicable invoices and workorders?
Response:
The project's contract completion date is 4/30/2026. See the enclosed letter from the contractor, Metro Builders & Engineers Ltd., to WRD, which indicates the updated schedule. After construction is complete, LA County and WRD will reconcile all costs. Suburban anticipates obtaining final costs and transferring assets within a few months after completing construction in 2026.

i. Please explain the payback timeframe for Suburban and how it will be reflected in RO Model for ratemaking purposes.
Response:
A payback cost-benefit analysis was not performed because Suburban is contractually obligated to pay Los Angeles County Public Works (LACPW) the difference between the final cost and the grant amount, regardless of the payback results. The costs reflected in the RO Model, Table 6-1B line 11, include only Suburban's share of the capital expenditures which will be paid to Los Angeles County Public Works (LACPW).

2. During the 02/24/2026 Suburban 2026 District Tour – Cal Advocates staff noticed the manganese treatment had no active electricity and supposedly a Southern California Edison (SCE) employee was working to restore power to the property.
   a. Please provide an update if the manganese treatment location has its power restored.
   Response:
   By describing the worker observed on site as "supposedly a Southern California Edison (SCE) employee," the statement implies that the worker was not an SCE employee and that Suburban was somehow being deceitful. If this inference is incorrect, what is the intention of this phrasing?

   As the entire Cal Advocates team observed during the site visit, Suburban staff spoke with the SCE employee, who indicated he would complete the work within SCE's panel by 2/24/2026. There was, and is, no reason to question that the employee was a representative of SCE; the employee was wearing an SCE uniform with an identification badge, an SCE truck was parked outside the site, and the employee was working on equipment that only SCE employees are authorized to work on. Enclosed with this data request is an email (DR ZS1-001 #2.a – SCE Schedule) from the Project Manager to Steve Harris, SCE Customer Service Planner, acknowledging that SCE was at the site the same day as Cal Advocates' site visit, installing wiring and current transformers (CT) for the electric meter.

   To date, power has not been restored to the site. The electrical service is anticipated to be energized by the end of March 2026.

   b. When does Suburban anticipate Well 5 will be online?
   Response:
   Once power is available, Metro Builder will perform equipment start-up testing. The start-up process is anticipated to take 4 weeks to complete. Well 5 and the manganese treatment are expected to be operational and provide water to Sativa by the end of April 2026.

   c. How much annual production (in acre-feet) does Suburban anticipate from Well 5?
   Response:

Based on current demand, annual production is anticipated to be 357.7 acre-feet.

d. Is this anticipated increase in production reflected in Suburban's RO model and if so where? If not please explain why?
Response:
No increase in production is shown in the RO model. However, contingent upon Commission approval of the project, Suburban's revised RO Model submitted on March 17, 2026, reallocates production for years 2027 and 2028 by reducing Liberty Utilities and City of Compton to zero acre-feet and transfering the associated 357.7 acre-feet of production (328.3 plus 29.4) to the Central Basin Owned Rights (cells O2564:P2564).

3. During the 02/24/2026 Suburban 2026 District Tour – Suburban staff talked about possible PFAS detection at the Well #5 location where the manganese treatment is currently being built.
   a. When does Suburban anticipate the work for the manganese treatment to finish?
   Response:
   As mentioned above in response to question 2.c, the anticipated completion of the manganese treatment plant is at the end of April 2026. This is consistent with the schedule discussed starting on page 166 of the Direct Testimony of Jorge Lopez.

   b. Has PFAS been detected at this well location by Suburban or any other entities? If yes, please provide a copy of the sampling reports that sampled for PFAS compounds.
   Response:
   Sativa Well 5 was tested on 1/17/23 with a 2.5 ng/L PFOS and on 4/10/23 with a 3.3 ng/L PFOS. Both results are below the current notification level (NL). The well was then taken offline to construct the manganese treatment plant. Division of Drinking Water (DDW) expects Suburban to sample the well for PFAS/PFOS before bringing the treatment plant back online. Suburban anticipates sampling the well at the end of April 2026.

   c. When does Suburban anticipate it can test for PFAS detection again at this well location?
   Response:
   Suburban anticipates sampling the well for PFAS in April 2026.

   d. What will Suburban do if there is PFAS detection at this well location? Please provide an explanation as to the steps Suburban anticipates taking to make Well #5 operational.
   Response:

If PFAS is detected at this well location, Suburban will follow these processes:

1. Determine if the level exceeds the Maximum Contaminant Level (MCL)
2. If level < MCL, no action will be taken
3. If level > MCL, we will evaluate treatment solutions. Blending is not allowed by State and Federal regulations. Suburban will perform a cost-benefit analysis comparing centralized treatment to wellhead treatment. The most cost-effective treatment will be selected.

Attachment 2-2

RESPONSE to Cal PA DR ZS1-003
(Sativa Custs. 1st Line for Water Supply Project)

(Available via Email)

Note: Due to file size, the data request response documents are available via Kiteworks

March 23, 2026

To: Zaved Sarkar
Utilities Engineer

Suliman Ibrahim
Project Coordinator

Corwin Hockema
Attorney for Public Advocates Office

Re.: Responses to A.26-01-001, Public Advocates Office DR ZS1-003 (Sativa Customers First in Line for Water Supply Project)

Dear Mr. Sarkar et al.,

Attached is the information you requested in writing for Suburban's Total Company General Rate Case.

Sincerely,

/s/Carmelitha Bordelon

Carmelitha Bordelon
Vice President, Regulatory Affairs & Finance

Responses to A.26-01-001, Public Advocates Office

DR ZS1-003 (Sativa Customers First in Line for Water Supply Project)

1. Please provide the following information:

   a. Water production (in Million Gallons) that was produced and purchased from 2023 through 2025 in the Sativa system.

   Response:

   The table below shows production from 2023 through 2025 in Million Gallons

Year	SWS Well 3 (MG)	SWS Well 3 (AF)	Liberty Utilities (MG)	Liberty Utilities (AF)	City of Compton (MG)	City of Compton (AF)	Total (MG)	Total (AF)
2023	58	177	55	170	31	96	144	442
2024	108	331	16	48	16	49	140	429
2025	133	407	6	19	5	15	144	441

   b. Maximum Day Demand (in MG) and the date (in MM/DD/YYYY) that was recorded from 2023 through 2025 in the Sativa System.

Response:

The table below shows maximum day demand in GPM and MG from 2023 through 2025. The demand exceeds the production capacity of Well 3.

Date	Maximum Day Demand (GPM)	Maximum Day Demand (MG)
10/1/2023	830	1.195
3/26/2024	770	1.110
4/6/2025	748	1.076

   c. Maximum Flow (in MG) and the month it occurred, that was recorded from 2023 through 2025 in the Sativa System.

Response:

The table below shows the monthly maximum flow.

Month of Year	Maximum Volume (MG)
January 2023	14.31 MG
July 2024	13.39 MG
August 2025	13.43 MG

2. Suburban states that “City of Compton has detected perfluorooctanesulfonic acid (PFOS) in their water.” (On PDF page 270, line 4 of the DIRECT TESTIMONY OF JORGE LOPEZ).

    a. When was Suburban notified of this? Please provide any email correspondence from City of Compton.

Response:

Suburban was notified by the City of Compton on October 1, 2024. Please see the attached document titled, “DR ZS1-003 #2.a Compton PFAS Notice”

    b. Please provide a copy of the PFAS concentration results as shown in Table 3 on PDF page 270 of the DIRECT TESTIMONY OF JORGE LOPEZ.

Response:

Enclosed with this data request is DR ZS1-003 #2.b WQ Report.PDF, which shows the PFAS concentrations for the City of Compton.

    c. Since the notification from City of Compton, please provide a list of instances in which Suburban received water through this interconnection. Provide any documentation such an invoices or email correspondence which shows the amount of water received.

Response:

Since taking ownership of the Sativa Water System, Suburban has relied on interconnections to meet demand, including the City of Compton. The City of Compton’s connection meter is read manually once a month, and production records show that this connection has been used monthly from April 2023 through December 2025. As noted in the Direct Testimony of Jorge Lopez, Page 267, “The City of Compton has been useful while Well 5 has been offline during construction of the manganese treatment plant.” See the table below showing the monthly demand from the City of Compton Connection.

Month	2023 (AF)	2024 (AF)	2025 (AF)
Jan	0	4	0
Feb	0	2	2
Mar	0	3	0
Apr	2	6	2
May	20	8	2
Jun	27	9	0
Jul	29	4	3
Aug	13	10	1
Sep	2	1	1
Oct	2	2	1
Nov	1	0	1
Dec	0	0	1
Total	96	49	15

d. List the instances, since City of Compton notified Suburban about PFAS detection, which Suburban requested water to be delivered through this interconnection and did not receive the requested water supply – for each instance date of request, amount requested and reason for denial.

Response:

To date there have been no water quality or water shortage emergencies in the City of Compton water systems that have necessitated the City to deny the connection's use to supply Sativa; however, past conditions cannot predict future events, and to assume that it won't happen in the future because it hasn't happened in the past is reckless. Further, as noted in the Direct Testimony of Jorge Lopez, Page 267, USEPA's pending MCL's for PFAS chemicals will render this supply unavailable.

3. Suburban states that "On several occasions Liberty water has not been available to Sativa because of shutdowns to repair leaks on their system, and a water supply emergency when one of the sources was not available." (On PDF page 271, line 16 and PDF page 272 on line 1of the DIRECT TESTIMONY OF JORGE LOPEZ).

a. Please provide a list of instances in which Suburban received water through this interconnection. Provide any documentation such an invoices or email correspondence which shows the amount of water received.

Response:

Suburban executed an agreement with Liberty in 2022 for emergencies as noted in section 5.1 of the agreement. Due to the high cost, Liberty Suburban has reduced its use from 2023. Due to the limited use of this connection, the valve is opened monthly to prevent poor water quality caused by stagnant water. See the table below showing the monthly demand from the Liberty Connection.

	2023 (AF)	2024 (AF)	2025 (AF)
Jan	44	3	1
Feb	34	1	3
Mar	36	3	0
Apr	34	9	2
May	10	3	5
Jun	2	12	4
Jul	1	3	0
Aug	6	5	3
Sep	0	3	0
Oct	1	3	0
Nov	0	3	0
Dec	0	1	0
Total	170	48	19

b. List the instances which Suburban requested water to be delivered through this interconnection and did not receive the requested water supply – for each instance date of request, amount requested and reason for denial.

Response:

Page 5, line 12 of the Testimony of Greg Galindo from General Rate Case A-2301001 recounts an event in December 2022 where Liberty Utilities disrupted supply to the connection. Communications related to this event were verbal, and these personnel are no longer employed by Suburban or Liberty. There may have been other events, but they were not documented since interactions between company system operators are typically verbal.

4. Since Suburban took ownership of the Sativa System, have there been any instances where both interconnections were unavailable? If so, please provide detailed information which includes any documentation, email correspondence where appropriate.

Response:

In 2023, Suburban installed a backflow preventer on the interconnection as part of the shared interconnection agreement, shown in section 4 (Backflow Prevention and Pressure Reduction). See the attached file titled, “DR ZS1-003 #4 Liberty Agreement”. As part of this work, the interconnection was taken offline for 8 hours while the backflow preventer was installed.

There have been no instances where the Compton and Liberty systems were simultaneously impacted by urban conflagration, drought water shortages, or water quality violations due to changing regulations, however, this does not prevent this from happening in the future.

5. Suburban states that to provide the Sativa system with resilience and storage capacity, installation of two 137,000-gallon bolted steel tanks with two 60 HP pumps and two 20 HP pump stations along with an emergency generator is required (DIRECT TESTIMONY OF JORGE LOPEZ at PDF page 283, lines 7-20).

    a. Please provide a detailed explanation and necessary calculations Suburban used to determine the tank capacity of 137,000-gallons for this project request.

    Response:

    The tank capacity was designed to maximize capacity within the 200-foot long by 50-foot-wide property. In Workpaper Volume III P-8 Appendix 3, Wood Rodgers' Basis of design report determined that two 32-diameter and 24-feet tall tanks would be the ideal capacity to fully utilize the site property while still leaving room for the pumps and Operations vehicles. In Workpaper Volume III P-8 Appendix 4, Wood Rodgers' Technical Memorandum notes that there will be 1-foot freeboard, making the maximum water height to be 23 feet. Using water height and the tank diameter, the volume capacity of each tank is determined to be 137,000-gallons per tank.

    b. Please provide a detailed explanation and necessary calculation Suburban used to determine the HP for the additional pumps it intends to install.

    Response:

    Wood Rodgers' Basis of Design report included in Workpaper Volume III P-8 Appendix 3, shows the pump assemblies were sized based on the total dynamic head (TDH) to be 150 ft, with small pump capacity to be 300-gpm, and large pump capacity to be 1,200-gpm. Assuming a pump efficiency of 75%, Suburban used this data to calculate horsepower (HP). Please see attached file titled, "DR ZS1-003 #5.b Pump HP Calculations." Two of each pump assembly are required for reliability. The small pumps are designed for optimal efficiency for ADD, while the larger pumps are designed for optimal efficiency during fire flows.

    c. Please provide an Excel spreadsheet, with all cells and links intact, of the cost estimates that was provided on PDF page 285, of the DIRECT TESTIMONY OF JORGE LOPEZ.

    Response:

    Please see the attached excel spreadsheet titled, "DR ZS1-003 #5.c Cost Estimate"

6. On PDF page 282-283, of the DIRECT TESTIMONY OF JORGE LOPEZ, Suburban mentions "Alternative 3 and Alternative 4", which it evaluated before concluding to present this project in this GRC.

    a. Please provide a detailed explanation and necessary calculation Suburban used to determine if these alternatives were not suitable for this project. Include any

documentation, cost benefit analysis, vendor quotes or email correspondence that are applicable.

Response:

Alternative 3 – Purchase multiple residential lots to tear down and build a 1.15 MG tank

The additional high cost of purchasing lots adjacent to Plant 802 from sellers who were not seeking to sell their property rendered this alternative too costly and unsuitable. Above market prices would have need to be paid for property to sellers who were unwilling to sell if they would accept an offer at all. Suburban does not have eminent domain authority, nor would it want to use it and upset the Sativa community by taking these homes. A cost benefit analysis is not required to understand this.

The Direct Testimony of Jorge Lopez, Page 280, includes a discussion on using Zillow to estimate the price to purchase these properties. Specifically, the Zillow estimates indicate each lot is valued at approximately $500,000, totaling $1.5 million for land alone. Zillow's estimate is shown in Appendix 5 of Workpaper P-8.

Alternative 4 – Construct another well

This alternative was determined to not be feasible, as discussed in the Direct Testimony of Jorge Lopez, page 281, due to the cost of drilling a new well being substantially higher than the proposed tank and pump station project.

Specifically, Suburban's estimated cost to drill and equip a new well in 2024 at Plant 429 was approximately $8.5 million ($3.16 million to drill, $5.34 to equip), as shown in Workpaper P-9. Assuming a well at Plant 802 would be of similar cost, Alternative 4 would be significantly more expensive than Alternative 2. A cost benefit analysis was not required to understand this.

7. Does this project require a CEQA study?

Response:

Yes, this project will require a CEQA exemption determination.

a. Did Suburban do anything in anticipation of a possible CEQA study? Please explain.

Response:

Suburban has evaluated the scope of work and concluded that a negative declaration or a mitigation negative declaration will be required, as shown in Workpaper Volume III, P-8, Appendix 3, of Wood Rodgers' Basis of Design report. Detailed project design and permitting will begin in 2027, in anticipation of construction starting in 2028. Suburban will not file for CEQA exemption until the project has been approved by the CPUC.

8. Suburban states "Operational storage is defined as 30% of the MDD, fire storage is based on LA County Fire Department's requirement of 1,250 gpm for 2 hours, and emergency storage is

defined as 100% of the MDD. (On PDF page 278, lines 7-10 of the DIRECT TESTIMONY OF JORGE LOPEZ)

a. Did Wood Rodgers develop this breakdown or Suburban?

Response:

The calculation for storage was provided by Wood Rodgers and developed using a common practice for operational, fire flow and emergency storage recommended by AWWA shown in the following references.

Operational Storage - M32: Manual of Water Supply Practices, page 116, Section 5.3.4.1 (Equalization Storage) indicates that equalization storage is typically based on the maximum day condition (MDD), with small service areas that could exceed 30% or more of MDD.

Emergency Storage - AWWA M32, page 117, Section 5.3.4.3 (Emergency Storage) indicates that a small system may desire a full day of emergency storage in the event of a systemwide power failure. It also states that emergency storage is a policy decision based on the desired degree of system dependability.

Fire Flow – Fire Flow was established using Los Angeles County Fire Department's residential requirements.

b. Please provide documentation which shows how these breakdowns and corresponding storage capacity numbers were developed for this project's purpose.

Response:

See response to question 8.a above, explaining the common practice for establishing storage. The Direct Testimony of Jorge Lopez, page 275 provides the basis used to determine storage capacity for the system. Storage capacity was determined based on the system's MDD, using production data from May 2023 to April 2024. MDD was determined to be 531 GPM. Table 5 shows the breakdown of how total system storage is calculated based on operational, fire, and emergency demand, resulting in a requirement of 1.15 MG.

9. During the 02/24/2026 Suburban 2026 District Tour - SWS staff indicated that the "Sativa Land Purchase" project was completed and Suburban was able to acquire two parcels of land beside the Well #5 plant location. Cal Advocates staff were also able to visit these parcels of land.

a. Please provide all invoices, property deeds, and email correspondence involved in purchase of this parcel of land.

Response:

Enclosed is an email to the escrow company leading up to closing escrow, titled "DR ZS1 #9 Escrow email". Enclosed is a copy of a letter from the Escrow company indicating escrow for 2075 & 2079 Stockwell was closed on 12/31/2025. The letter includes copies of the closing statement and property tax bill. File name is DR ZS1-003 #9.a Closing Package. A copy of the recorded grant deed is also included, titled

DR ZS1-003 #9.a Grant Deed. The deeds were received via the US Postal Service, and there is no corresponding email.

b. What other option did Suburban explore before purchasing these parcels of land?

Response:

Suburban was unable to identify other available land adjacent to the existing plant sites for sale that would serve this purpose. Suburban was unable to identify an alternative for parking company utility vehicles and large delivery and service vehicles on site because narrow streets and crowded street parking prevent parking on the street creating safety risks and service disruptions for the community.

As recently as March 2026, the contractor constructing the treatment plant requested permission from Suburban to use the newly acquired property as a laydown area. To facilitate paving work, sand from the treatment plant was relocated to the new property.

i. Did Suburban make any contact with the owner regarding acquisition of an easement? If so, please provide details. If not, please explain the reason.

Response:

No. The representative of the estate contacted Suburban indicating that the parents had passed away and the property needed to be sold (liquidated) so the value of the estate could be distributed to its heirs. There was no option for an easement because it would not have liquidated the asset.

c. When does Suburban intend to begin demolition of this parcel of land? Please provide any vendor quotes or invoices which show the cost of demolition of this parcel of land.

Response:

Demolition and Permitting Status

Suburban expects to begin demolition in the second quarter of 2026. Required South Coast AQMD testing has been completed, bids have been received, and Woody's Demolition has been selected to perform the work. The Construction & Demolition (C&D) sub permit was issued by Los Angeles County Public Works on February 23, 2026, and the Building Department Demolition Permit was issued on March 17, 2026. To secure the site following demolition, a permit application to install a steel fence was submitted in March 2026; approval of this permit is still pending.

Utility Disconnections

Water service was disconnected and the meter removed on January 15, 2026. On the same date, Southern California Edison (SCE) was contacted to disconnect electrical service. As of March 4, 2026, SCE has completed its site inspection and entered the work order into its system, with electrical disconnection scheduled for April 24, 2026.

Southern California Gas Company (SoCalGas) visited the site and provided an update on February 25, 2026, indicating that an excavation permit from Los Angeles County is required to abandon the gas service. Because this is a single-service abandonment, issuance of the excavation permit is expected within approximately one month.

Outstanding Items and Anticipated Dates

- Approval of steel fence permit (submitted March 2026)
- SCE electrical disconnection scheduled for April 24, 2026
- Issuance of LA County excavation permit for gas service abandonment (anticipated by late March 2026)

Attachment 2-3

RESPONSE to Cal PA DR ZS1-002
(Sativa Pipeline Replacement Phase 2)

(Available via Email)

Note: Due to file size, the data request response documents are available via Kiteworks

March 23, 2026

To: Zaved Sarkar
Utilities Engineer

Suliman Ibrahim
Project Coordinator

Corwin Hockema
Attorney for Public Advocates Office

Re.: Responses to A.26-01-001, Public Advocates Office DR ZS1-002 (Sativa Pipeline Replacement Phase 2)

Dear Mr. Sarkar et al.,

Attached is the information you requested in writing for Suburban's Total Company General Rate Case.

Sincerely,

/s/Carmelitha Bordelon

Carmelitha Bordelon
Vice President, Regulatory Affairs & Finance

Responses to A.26-01-001, Public Advocates Office

DR ZS1-002 (Sativa Pipeline Replacement Phase 2)

1. During the 02/24/2026 Suburban 2026 District Tour - SWS staff indicated that all Sativa customers have been converted to metered customers.

    a. Please provide the number of customers currently active in the Sativa system, who have been metered.

    Response:

    As of March 10, 2026, approximately 1,332 metered customers are currently active in the Sativa system.

    b. Please provide the timeline of when the metering process was completed and when the period of acclimation billing started to educate the customers on the structure of metered billing.

    Response:

    The capital project to convert Sativa customers to metered service was implemented during the period May through December 2023.

    A six months acclimation billing period was originally scheduled from July 2023 through December 2023 to educate customers regarding the transition from a fixed-charge structure to metered billing.

    However, Suburban provided the comparison billing which displayed charges under both the new metered billing structure and the fixed-charge methodology from July 2023 through September 2025. The comparison billing was intended to support customer understanding of the impacts of metered billing compared to fixed-charge methodology.

    c. Please provide the timeline of when the grace period of fixed rate billing ended and customers have been switched over to metered billing. Provide any relevant documentation or customer notices sent.

    Response:

    Pursuant to GRC Decision (D.) 24-12-030 mailed on December 19, 2024, and consistent with Commission's approval of Special Request 17, the authorized monthly trial rate for Sativa's customers is $67.52 for a six-month period following meter installation.

    Customer communication supporting the transition to metered billing are provided in the files titled "1c. ZS1-002 - Sativa #1.pdf" and "1c. ZS1-002 - Sativa #2.pdf."

The "Sativa #1" file includes monthly comparison billing provided to customers during the period July 2023 through October 2025. The "Sativa #2" file contains notifications informing customers of the timing of their transition to metered billing.

d. Has SWS noticed any increase in customer interest for Suburban's CAP (LIRA) program and the LIHWAP assistance program? If so, please provide details on how Suburban is handling those cases.

Response:

No, SWS has not noticed any increase in customer interest for Suburban's CAP. LIHWAP program was officially ended on March 31, 2024 in California.

2. Suburban states that it completed fire flow related capital improvement pipeline projects, which it deems as "Sativa Pipeline Phase 1", which includes: (1) Stockwell, (2) Vesta, (3) Willowbrook, (5) Wilmington, (10) W. Willowbrook, and (11) E. Willowbrook (On PDF page 433-434 of the DIRECT TESTIMONY OF JORGE LOPEZ).

a. Please provide in an Excel spreadsheet the detailed breakdown of all cost items involved for each pipeline projects completed in Sativa as part of Phase 1. This should include when project was started and completed, unit cost, any cost adders, inflation and administrative costs incurred to conclude the projects.

Response:

Suburban competitively bid this project and is including with this data request the tabulation of bids showing a summary of vendors' proposals. Suburban selected the lowest cost proposal. See the attached Excel spreadsheet titled "DR ZS1-002 2A Response – Sativa Pipeline, tab Tabulation of bids". The bid schedule grouped quantities into a single project and did not separate them into pipeline segments.

Change Orders, referred to as cost adders by Cal Advocates, are shown in the Change Order Tab. The file tab titled Project Timeline includes the start and end dates of the project.

The Sativa Pipeline Phase 1 was broken into two sections (West/East) that were placed into service at different times because construction on the east side Willowbrook Ave was delayed due to delays obtaining a permit from Los Angeles County Metropolitan Transit Authority (Metro). Enclosed are two closing summary sheets, DR ZS1-002 – 2.a – West Closing and DR ZS1-002 – 2.a – East Closing, showing the general administration costs.

The Sativa Pipeline Phase 1 (West) closing sheet shows a total amount of $3,843,607.78 (Cell B59) was incurred in 2024 but $3,350,954.73 of the total project was placed into service. $492,653.05 (Cell D59) was part of the East side of the project.

The Sativa Pipeline Phase 1 (East) closing sheet shows a total amount of $5,443,332.72 (Cell B95) but this includes $3,350,954.74 for costs incurred in the west side of the project. The amount closed in 2025 for the east side was $2,092,378

A project inflation factor is only used to estimate future costs. This project has been completed, and inflation is not required.

b. Please provide detailed vendor bids and final receipts.

Response:

Enclosed is the bid proposal for the contractor awarded the contract, titled, "DR ZS1-002 2.b – Proposal." The proposal matches the amount shown in the tabulation of bid enclosed as requested in question 2.a.

Enclosed is the final invoice titled "DR ZS1-002 2.b Response - Final Invoice".

c. Please provide an explanation of what was accomplished with each pipeline project (i.e. moving pipeline segment from people's backyard to a main street, increasing pipe sizes, distribution system's performance, fire-flow requirements etc.)

Response:

The Sativa Pipeline Phase 1 Project replaced and relocated deteriorated and undersized mains to improve available fire flow rates, eliminate dead ends, and improve flushing velocities to address issues raised by DDW in their sanitary surveys provided in Workpaper Volume III P-17 Appendix 3 & Appendix 4.

The replaced pipes were approximately 80 years old and deteriorated due to age. These pipes were at a high risk of failure that would result in interruption of service to customers and damage to public and private property. The PVC pipe that was used to replace them will provide a long period of maintenance-free operation and improve the reliability of the water system.

Replacing 2-inch and 4-inch pipes with 8-inch pipes has greatly improved the flow capacity of the pipelines for both normal peak-demand operations and fire-flow events.

Each section of pipe replaced was strategically selected to relocate water mains out of backyards and alleys into the public right of way adjacent to streets. Backyard mains do not have fire hydrants that are required to provide water to fire departments for fighting fires to prevent the loss of possessions, homes, and even lives. The relocated mains have fire hydrants located behind the curb in the public right of way that are accessible by fire fighters.

Also, the existing hydrants at Sativa were 4-inch fire hydrants that limit fire protection to one 2.5-inch hose connection. The new hydrants installed on the replaced pipelines are 6-inch fire hydrants that meet modern standards, and offer a 2.5 -inch hose connection, and a 4-inch pumper connection for fire engines.

Further, portions of the existing deteriorated pipelines in backyards and alleys could not be accessed for repair due to structures built over them. Further, customers in this predominantly immigrant community are wary of people knocking on their door and

accessing to their yards due to recent Federal Government Immigration enforcement activities. Backyard mains pose a safety risk for Suburban's employees and contractors.

Where possible, these new pipelines were aligned to eliminate dead ends. Water can sit stagnant in dead ends for an extended period of time resulting in poor water quality. Eliminating dead ends improves customers' water quality. Further, where it was not feasible to loop pipes due to the design of the streets, blow-offs were installed on replacement pipes to facilitate flushing to improve the water quality.

The sections below provide specific details for pipe segments:

(1) Stockwell: Existing 4 inch AC backyard main replaced with 8-inch PVC, relocated to Stockwell between Aranbe & Willowbrook. Two 4-inch hydrants were replaced with modern 6-inch fire hydrants.

(2) Vesta: Existing undersized 4-inch AC backyard main replaced with 8-inch PVC, relocated to Vesta between Stockwell & Wayside. The Direct Testimony of Jorge Lopez, Page 434, Table 1 demonstrates that fire flow has improved from 854gpm to 1,59gpm since the completion of Phase 1. One 4-inch hydrant was replaced to a modern 6-inch fire hydrant.

Additionally, Wood Rodgers' hydraulic model included in Figure 4, Appendix 2 of Workpaper P-17 shows the velocity of the new pipeline on Vesta is within an acceptable range below 7 feet/second under MDD+FF conditions, compared to the velocity exceeding 15 feet/second of the backyard and alleyway pipelines prior to Phase 1.

(3) Willowbrook: Existing undersized 4-inch AC main located in narrow alley replaced with 8-inch PVC, relocated to Willowbrook Ave. between Lucien & Oris. This segment eliminated two dead-ends, one being located on Piru and another located in customers' backyards between Hatchway and Piru. Five 4-inch hydrants were replaced to modern 6-inch fire hydrants.

(5) Wilmington: Existing undersized 2-inch AC alley in Wilmington's parkway was replaced with 8-inch PVC, relocated to Wilmington Ave. between 138th & 139th Street. One 4-inch hydrant was replaced to a modern 6-inch fire hydrant.

(10) W. Willowbrook: Existing undersized 4-inch backyard main replaced with 8-inch PVC, relocated to Willowbrook Ave. between Wayside and Stockwell. This section eliminated the dead-end at the corner of Wayside and Willowbrook. Two 4-inch hydrants were replaced to modern 6-inch fire hydrants.

Also, Wood Rodgers' hydraulic model included in Figure 4, Appendix 2 of Workpaper P-17 shows the velocity of the new pipeline on Willowbrook is within an acceptable range below 7 feet/second under MDD+FF conditions, compared to the velocity exceeding 15 feet of the backyard and alleyway pipelines prior to Phase 1.

(11) E. Willowbrook: Existing undersized 4-inch AC alley main replaced with 8-inch PVC, relocated to Willowbrook Ave. between Wayside and Stockwell. One

4-inch hydrant was replaced to a modern 6-inch fire hydrant and a 2-inch blow-off was installed at the north end of Willowbrook Ave.

Wood Rodgers' hydraulic model included in Figure 4, Appendix 2 of Workpaper P-17 shows the velocity of the new pipeline on Willowbrook is within an acceptable range below 7 feet/second under MDD+FF conditions, compared to the velocity exceeding 15 feet of the backyard and alleyway pipelines prior to Phase 1.

d. Please explain in detail how the pipeline projects completed have significantly improved the overall system performance. Provide any detailed documentation, calculations and assumptions used to determine the system's performance.

Response:

See response to question 2.c above for improvements due to specific sections.

3. Suburban proposed several fire flow related capital improvement pipeline projects, which it deems as "Sativa Pipeline Phase 2", which includes: (4) Hatchway Jack & Bore, (6) Wayside, (7) Vesta, (8) Lucien, (9) Stockwell, (12) 138th, and (13) 139th. (On PDF page 441, lines 16-19 of the DIRECT TESTIMONY OF JORGE LOPEZ).

a. Please provide in an Excel spreadsheet the detailed breakdown of all cost items involved for each pipeline projects included in Sativa as part of Phase 2. This should include projects starting and completion dates, unit cost, any cost adders, inflation and administrative costs Suburban anticipates will be incurred to conclude the projects.

Response:

Included with this data request is the cost estimate in Excel format, shown on Page 444 of the Direct Testimony of Jorge. This project is scheduled to start and be completed in 2028. The cost estimate includes an inflation factor and administration costs. Please see attached file titled, "DR ZS1-002 3A Response - Phase 2 Cost Estimate"

b. Please provide detailed vendor bids and work orders already received/drafted.

Response:

Please refer to response #3a, project is scheduled for 2028 and will not be sent out to bid until 2027.

c. Please provide an explanation of what Suburban expects to accomplish with each pipeline project (i.e. moving pipeline segment from people's backyard to a main street, increasing pipe sizes, distribution system's performance, fire-flow requirements etc.)

Response:

See response to question 2.c. for benefits for these pipelines. The sections below provide specific details for pipe segments.

(4) Hatchway Jack & Bore: The Sativa system is divided by the Los Angeles Metropolitan Transportation Authority (Metro) railroad line. Currently there are only two undersized 6-inch pipes, and one 8-inch pipe that connect the east and west sections of the water system. This segment involves the installation of a 12-inch pipeline underneath the railroad to improve transmission between the east and west sides which will improve fire flow availability, maintain pressure during high demand periods and events, and promote water circulation to maintain water quality.

(6) Wayside: Replace the existing deteriorated and undersized 4-inch perimeter pipeline with 8-inch PVC on Wayside between Aranbe and Willowbrook. This segment will improve fire flow and flushing velocities by eliminating the flow bottleneck created by the existing 4-inch pipe between Vesta and Willowbrook. Two hydrants will be replaced with modern 6-inch fire hydrants.

(7) Vesta: Install 8-inch PVC pipeline on Vesta between Stockwell & Oris. This segment will improve the distribution system performance, improving flushing velocities, and improving fire protection by increasing the grid and allowing water to travel north and south in the middle of the system.

Workpaper, Volume III, P-17, Appendix 2: The Wood-Rodgers model shows that this new pipeline will improve velocities on adjacent pipelines, demonstrating less head loss on adjacent pipes and improved flow.

Installing a new pipeline along Vesta will loop the distribution system improving water quality and reducing service interruptions during shutdowns by increasing the number of loops in the distribution system.

(8) Lucien: Replace the existing deteriorating and undersized 4-inch main with 8-inch PVC on Lucien between Largo & Mona. This segment will improve the distribution system's performance by increasing the flow capacity of the pipeline, improving flushing velocities and improving fire protection to the northeast extremity of the Sativa water system.

The model provided in Volume III P-17 Appendix 2, Wood Rodgers shows that the new pipeline will improve velocities on Lucien and adjacent pipelines, demonstrating less head loss on adjacent pipes and improved flow.

(9) Stockwell: Replace the existing deteriorating and undersized 4-inch AC pipeline on Stockwell between Paulsen & Aranbe. This segment will improve the distribution system performance by increasing the flow capacity of the pipeline, improving flushing velocities and improving fire protection in the center of the Sativa system. One 4-inch hydrant will be replaced with a modern 6-inch fire hydrant.

The model provided in Volume III P-17 Appendix 2, Wood Rodgers shows that the new pipeline will improve velocities on Stockwell and adjacent pipelines, demonstrating less head loss on adjacent pipes and improved flow.

(12) 138th: Replace the existing deteriorating and undersized 4-inch AC main with 8-inch PVC on 138th between Wilmington & Paulsen. This segment will improve the distribution system performance by increasing the flow capacity of the pipeline, improving flushing velocities, and fire protection.

In the Direct Testimony of Jorge Lopez, Page 437, Table 2 shows that 138th street customers will experience low fire flow. In the Direct Testimony of Jorge Lopez, Page 442, Table 3 shows that the adjacent street, Wilmington, experiences pressure drops during fire flow. It is expected that installing a new, larger pipeline on 138th will provide improvements similar to those seen in Phase 1.

(13) 139th: Replace the existing deteriorating and undersized 4-inch AC main with 8-inch PVC on 139th between Wilmington & Paulsen. This segment will improve the distribution system performance by increasing the flow capacity of the pipeline, improving flushing velocities, and fire protection. One 4-inch hydrant will be replaced with a modern 6-inch fire hydrant.

The Direct Testimony of Jorge Lopez, Page 437, Table 2 shows that 139th street customers experience low fire flow. In the Direct Testimony of Jorge Lopez, Page 442, Table 3 shows that the adjacent street, Wilmington, experiences pressure drops during fire flow.

d. Please explain in detail how the pipeline projects, when completed, will have improved the overall system performance. Provide any detailed documentation, calculations and assumptions used to determine the system's performance.

Response: See response to question 3.c above.

4. Suburban stated that "The scope also includes the installation of 240 LF to 12-inch fusible PVC underneath the railroad to add an additional connection between the east and west sections of the system." (On PDF page 441, lines 20-22 of the DIRECT TESTIMONY OF JORGE LOPEZ).

   a. Is this project separate from the seven pipeline projects mentioned in question 3? If so, please provide a detailed description of the project, a detailed breakdown of the cost estimates, which includes any unit cost, any cost adders, inflation and administrative costs Suburban anticipates will be incurred to conclude this project.

   Response:

   No. This project is part of the Sativa Pipeline Replacement Phase 2, referred to as segment #4, the Hatchway jack & bore (see response to 3.c. above).

The costs estimate for this project, Segment 4, is included in the Direct Testimony of Jorge Lopez, page 444, and is shown as item's #1 (12" fusible PVC) and #2 (Jack & Bore Casing).

5. How many fire hydrants have been replaced or newly installed in Sativa system since Suburban has taken full ownership of the system? Please provide a detailed breakdown.

Response:

For Phase 1, 12 new 6-inch fire hydrants were installed to replace old fire hydrants as shown in response 2.c.

Please note that for Phase 1 the contractor bid shown in DR ZS1-002 2.b – Proposal includes 18 fire hydrants; six were later removed from the scope in Change Order #8 due to an error in the bid quantity takeoff count.

For Phase 2 Suburban will replace 9 of undersized 4-inch hydrants with 9 modern standard 6-inch hydrants that will be installed according to modern spacing requirements when mains are replaced.

6. Since taking full ownership of the system, has Suburban had any system wide outage, main breaks or any fire-flow emergency events where the Sativa system had to be depressurized and/or could not provide enough water flow into the system? Please provide a detailed description of such events if applicable.

Response:

Suburban has experienced ten (10) main breaks since taking ownership of the Sativa water systems. During these events, our field operations team used valves to isolate the portions of the system adjacent to the leaks to facilitate repairs. Using valves to isolate the affected area limits the service interruption and prevents systemwide depressurization. However, the customers within the shutdown area experienced an interruption of water service while the portion of the system was pressurized.

There has been fire flow events that have resulted in a systemwide depressurization.

7. How many dead-ends are in the Sativa distribution system? How frequently does Suburban conduct dead-end flushing in the system? Please explain in detail the dead-end flushing events since Suburban took ownership of Sativa system.

Response:

The Sativa Pipeline Replacement Phase 1 Project eliminated three (3) dead-end mains. There are now ten (10) remaining dead-ends mains in the Sativa distribution system.

Suburban has been flushing the Sativa water system's dead-end mains every two weeks since taking ownership of the system. Suburban has a field operator dedicated to the Sativa water system who ensures these dead-ends are flushed.

8. How many valves are in the Sativa distribution system? How frequently do Suburban conduct valve exercise events? Please explain in detail the timeline of valve exercise events since Suburban took ownership of Sativa system.

Response:

There are 213 valves in the Sativa distribution system. There are 156 isolation valves, and 57 hydrant valves. Suburban integrated these valves into our valve exercise program, which exercises valves every 4 years. The 2025 Sanitary Survey includes the Division of Drinking Water's (DDW) acceptance of a 4-year exercise cycle (Workpaper Volume III P-17 Appendix 3 & Appendix 4). . The Sativa water systems valves were last exercised in 2023 upon taking ownership of the system and are next scheduled to be exercised in 2027 to comply with DDW's requirements.

9. Suburban states "Sativa experiences poor system pressure during high demand." (On PDF page 440, line 2 of the DIRECT TESTIMONY OF JORGE LOPEZ).

    a. Since Suburban took ownership of Sativa system, how many times has the system experienced poor system pressure? Please provide detailed explanation of such occurrence with related documentation if applicable.

    Response:

    Suburban's only active pressure monitoring instrumentation in the Sativa water systems is located at Well 3. The well uses the pressure indicator to modulate production to maintain the desired pressure set point, resulting in constant pressure no matter the demand conditions in the system. This is not representative of the pressure in any other part of the system. As water moves away from the source, headloss from undersized pipes will consume hydraulic energy and result in lower pressures. Headloss and pressure drop become worse when flows increase during high customer demand periods or fire flow events.

    Suburban does not have pressure monitoring instrumentation at other parts of the system, especially at dead ends that are far removed from the sources that would experience the most drop, to demonstrate low pressure events. For this reason there is no documentation of low pressure events.

    Fire flow availability tests cause high flow events and demonstrate the impact that undersized pipes have on residual pressure in the water system. For example, the Direct Testimony of Jorge Lopez, Table 3 on page 442 shows the pressure at Wilmington dropped to 32.77psi during a nearby fire flow in an area with undersized pipelines.

    Workpaper Table 2 of the Direct Testimony of Jorge Lopez (see included documents titled "DR ZS1-002 9A Response – Fire Flow 8969" and "DR ZS1-002 9A Response – Fire Flow 8979",) summarizes fire flow availability tests results on Sativa fire hydrants and show poor residual pressure during fire flow tests indicating that pipe headloss is consuming available hydraulic energy.

b. Has Suburban been out of compliance with GO 103 A? If yes, please provide detailed explanation of such occurrence with related documentation if applicable.

Response:

General Order 103-A, section 6. A. Variations in Pressure states "the minimum operating pressure at each service connection throughout the distribution system is not less than 40 psi nor more than 125 psi, except that during periods near PHD the pressure may not be less than 30 psi".

As noted in the response to question 8.a., Suburban does not have pressure sensors in the Sativa water system away from its W-3 source to indicate low pressure during high demand events. However, the fire flow availability test on fire hydrant 8969 caused a residual pressure of 25psi at an observed flow of only 475gpm. This observed flow was well below the Peak Hour Demand (PHD) of 910gpm indicating that the system would experience similar pressure drops below GO 103-A requirements during high demand events.

10. Suburban states "High velocity increases the rate of erosion on the already aging piping, increases the risk of leaks and shortens the useful life of the system." (On PDF page 440 line 26 and PDF page 441 line 1 of the DIRECT TESTIMONY OF JORGE LOPEZ).

a. Since Suburban took ownership of Sativa system, did Sativa system complete a thorough pipeline inspection which included a quantitative risk assessment to figure out the probability of failure and consequence of failure of the existing pipelines? If so, please provide a copy of that report.

Response:

At the time of the acquisition Suburban did not receive any main break history data from the defunct Sativa Water District. As a result, Suburban has insufficient break data history from the Sativa water system to perform a quantitative risk assessment, Likelihood of Failure Score, or Consequence of Failure Score.

Suburban has, however, experienced ten (10) main line breaks since it became the systems owner, indicating that the pipes are failing due to age and deterioration.

Further, the basic flowrate equation (flowrate = flow divided by area) dictates that the flow through Sativa's 2-inch and 4-inch diameter pipes will cause higher velocities than modern 8-inch diameter pipes, and it is well established that higher velocities cause pipe erosion, AWWA Manual M58.

b. Please provide the following information on each segment (where applicable and available) of the existing pipeline requested to be replaced as part of Sativa Pipeline Phase 2:

Response:

The following table summarizes the existing pipelines. The additional information requested is provided following the table below.

Description	Wayside	Lucien	Stockwell	138th	139th	Hatchway Jack & Bore (New pipeline)	Vesta (New Pipeline)
Replacement Quantity (LF)	1250	620	860	650	590	n/a	n/a
Material	AC	Steel	AC	AC	AC	n/a	n/a
Age	82	66	66	77	67	n/a	n/a
Size	4	4	4	4	4	n/a	n/a

i. Age.

Response:

The average age of the existing pipelines is roughly 72 years old, with most of the Sativa system being built in the 1940s.

ii. Length.

Response:

The total project replacement is 5,160 linear feet of pipe.

iii. Size.

Response:

The existing pipe is 4-inch diameter.

iv. Material.

Response:

The existing pipeline is primarily Asbestos Cement (AC), with small section of steel pipe.

v. Replacement unit cost.

Response:

Suburban estimated the unit cost for replacing the existing pipeline with 8-inch PVC is $182 per linear foot as shown on page 444 of the Direct Testimony of Jorge Lopez.

vi. Likelihood of failure score.

Response:

Likelihood failure score was not calculated. See response in question 9.

vii. Consequence of failure score.

Response:

The consequence of Failure score was not calculated. See response in question 9.

viii. Project risk score (PRS).

Response:

The Project Risk Score was not calculated. See response in question 9.

c. Please provide the following information on each leak that may have occurred in each segment of the pipeline being proposed to be replaced in Item b above.

i. The date of the leak.

Response:

Suburban experienced a break on Lucien on May 11, 2024.

ii. The age and size of the pipe.

Response:

The existing pipe is around 85 years old and is 4” AC pipe.

iii. Type of leak (pinhole, rupture, long crack, etc.).

Response:

The type of leak was a 2” long crack.

iv. Cause of break (deteriorating condition, operating condition, damage from outside source, etc.)

Response:

The break was caused by broken/old pipe.

v. Repair method.

Response:

The failed section was replaced with a section of 4-inch PVC pipeline with flex couplings.