

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

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Application of Suburban Water Systems  
(U339W) for Authority to Increase Rates  
Charged for Water Service by  
\$19,971,673 or 19.41% in 2027, by  
\$10,876,890 or 8.91% in 2028, and by  
\$10,831,656 or 8.15% in 2029.

Application 26-01-001

**PROTEST OF THE PUBLIC ADVOCATES OFFICE**

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BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Application of Suburban Water Systems (U339W) for Authority to Increase Rates Charged for Water Service by \$19,971,673 or 19.41% in 2027, by \$10,876,890 or 8.91% in 2028, and by \$10,831,656 or 8.15% in 2029.

Application 26-01-001

**PROTEST OF THE PUBLIC ADVOCATES OFFICE**

**I. INTRODUCTION**

Pursuant to Rule 2.6 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this Protest to Suburban Water System’s (Suburban’s) Application (A.)26-01-001.<sup>1</sup>

Suburban requests authorization to increase its rates for water service by over \$19 million in 2027, which would increase current average system rates by nearly 20%.<sup>2</sup> Suburban proposes an additional increase of almost \$11 million in 2027, and another \$11 million in 2029 for a total average system rate increase of nearly 41%.<sup>3</sup> This would translate into an average residential customer bill increase of \$32.26.<sup>4</sup> This amount does not include surcharges.<sup>5</sup> Cal Advocates is concerned with the magnitude of the proposed

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<sup>1</sup> Application Of Suburban Water Systems (U339W) For Authority To Increase Rates Charged For Water Service (Application).

<sup>2</sup> Notice of Suburban Water Systems’ Rate Increase Request Suburban Water Systems’ General Rate Case Application to the California Public Utilities Commission, Exhibit B (Exhibit B) at 1.

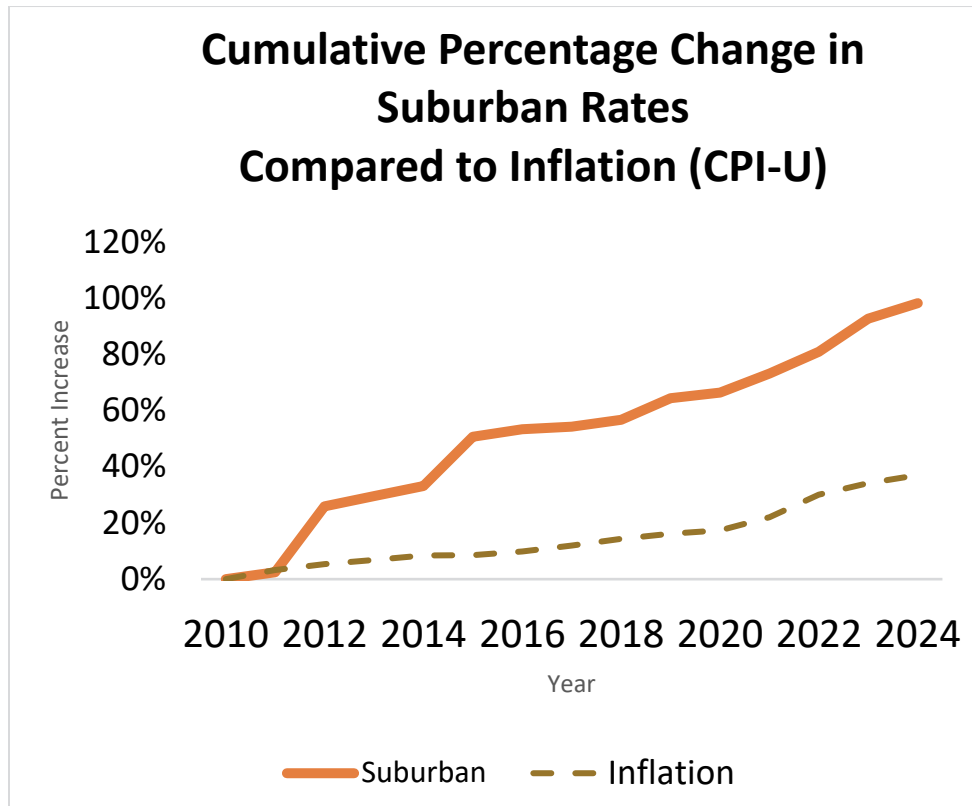
<sup>3</sup> Exhibit B.

<sup>4</sup> Exhibit B.

<sup>5</sup> Special Request No. 1: Various Offsets includes a one-time surcharge of \$0.357 per one hundred cubic feet. (Application at 6.) Special Request No. 2: Customer Assistance Program (CAP) includes a surcharge of \$0.195 per one hundred cubic feet. (Application at 7.) Per Exhibit B, the average customer bill is 12 CCF, so the Various Offsets would result in a \$4.284 charge on the average bill while the CAP surcharge results in a \$2.34 charge.

increase. As shown in Figure 1 below, the percentage increase in Suburban’s rates has far outpaced inflation over the last fifteen years. Suburban’s proposed rate increase in this proceeding would accelerate this trend.

**Figure 1: Cumulative Percentage Change in Suburban Rates Compared to Inflation<sup>6</sup>**



## II. APPLICATION ISSUES TO BE ADDRESSED

Cal Advocates is conducting discovery and analysis to address the issues raised by the Application, including whether Suburban’s proposed revenues, expenses, rate base, and rate design are just and reasonable. Additionally, Cal Advocates is reviewing whether Suburban’s special requests are just and reasonable. In particular, Cal Advocates

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<sup>6</sup> All data used in creating the graph was obtained from Suburban’s Annual Report to the Commission Schedules B-1 (total water service revenues) and D-7 (total water delivered to metered customers). For each year, total revenue in dollars was divided by total production in centum cubic feet (CCF) to establish an average volumetric cost. The percent increase was then calculated for each year starting with the year 2010 as a baseline and the cumulative increase was graphed and compared to the Consumer Price Index for All Urban Customers (CPI-U) over the same period.

opposes Suburban's special request within its proposed Water Consumption Plan, which includes two new balancing accounts, a Revenue Stability Mechanism Balancing Account (RSMBA) and a Production Expense Balancing Account (PEBA).<sup>7</sup> Finally, there is a pending Petition for Modification<sup>8</sup> (Cal Advocates' PFM) in Suburban's previous rate case, which should be decided before intervenors prepare testimony, and may require rate adjustments. A decision on Cal Advocates' PFM and any subsequent rate impacts are important to developing an accurate record in this proceeding.

In addition to the above issues, the following is a non-exhaustive list of issues the Commission should consider in this proceeding.

1. Whether Suburban's proposed rate increases for the Test Year and Escalation Years are just and reasonable.
2. Whether Suburban's estimated number of customers, consumption, and forecasted revenues at present rates are reasonable and supported.
3. Whether Suburban's proposed revenue requirement (and the various components of that revenue requirement) are reasonably calculated to provide safe and reliable service at the lowest cost.
4. Whether Suburban's proposed rate designs are equitable and promote the Commission's goals of affordability, conservation, and social justice.
5. Whether Suburban's proposed alternative ratemaking mechanisms, including its various balancing and memorandum accounts are reasonable and in the public interest.
6. Whether Suburban's eleven special requests are consistent with just and reasonable rates and adhere to Commission rules, general orders, and standard practices.

### **III. NEED FOR HEARINGS**

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<sup>7</sup> Direct Testimony of Carmelitha Bordelon at 14-16.

<sup>8</sup> Public Advocates Office Petition for Modification of Decision 24-12-30, as Modified by Decision 25-07-012 (A.23-01-001).

The Application raises material issues of fact that may require evidentiary hearings to enable the Commission to achieve a full, timely, and effective resolution of the proceeding. Therefore, the Commission should adopt a schedule that allows parties a reasonable time to conduct discovery, prepare testimony, and participate in evidentiary hearings. Cal Advocates is also willing to participate in Alternative Dispute Resolution, and parties should be given time to do so. If evidentiary hearings are held in person, they should be held at the Commission's Los Angeles office because Suburban's service territories are located in Southern California, and most of Cal Advocates' and Suburban's staff working on this Application are also located there.

#### **IV. SCHEDULE**

The schedule should be contingent on two critical events: a decision on Cal Advocates' PFM in Suburban's previous rate case and Suburban's submission of its prior year (2025) recorded data. Cal Advocates' PFM must be addressed before intervenors prepare testimony, as it identifies errors in the RO Model that must not be carried forward into this GRC, and may require additional time to correct overcollections. Additionally, Suburban has not yet provided 2025 recorded data, which is necessary for Cal Advocates' testimony. Accordingly, the schedule must allow sufficient time for these issues to be resolved. As indicated below, intervenor testimony should be served three months after both of these events. All other events in the proposed schedule would follow from this date.

	<b>Suburban's Proposed Schedule</b>	<b>Cal Advocates' Proposed Schedule</b>
Application Filed/Testimony Served	1/02/26	1/02/26
Prehearing Conference and Public Participation Hearing Start Date	1/12/26	02/23/26
Prehearing Conference End Date	3/17/26	03/18/26
Update of Applicant's Showing	2/16/26	4/12/26
Public Participation Hearing End Date	4/01/26	7 days after Cal Advocates Testimony is Served
Cal Advocates Testimony	4/08/2026	97 Days After Suburban Issues 2025 Data and PFM Ruling
Other Intervenor Testimony	4/08/26	97 Days After Suburban Issues 2025 Data and PFM Ruling
Rebuttal Testimony	4/23/26	112 Days After Suburban Issues 2025 Data and PFM Ruling
Meet and Confer Per Rule 13.9	--	No later than 10 days after submission of rebuttal testimony

	<b>Suburban's Proposed Schedule</b>	<b>Cal Advocates' Proposed Schedule</b>
Alternative Dispute Resolution Begins	4/26/26	15 days after issuance of Cal Advocates/Intervenor Testimony (propose 10 days of ADR time per the RCP)
Evidentiary Hearings Start Date	5/07/26	Following 14 days of ADR/Settlement Time (propose four days of hearings)
Opening Briefs Filed and Served	6/10/26	45 days after Evidentiary Hearings
Reply Briefs Filed and Served (with Comparison Exhibit)	6/25/26	3 weeks after Opening Briefs
Water Division Technical Conference	6/30/26	After submission of reply brief
Proposed Decision Mailed	8/31/26	Approximately 65 days after reply brief submittal
Comments on Proposed Decision	9/18/26	20 days after PD issuance
Reply Comments	9/23/26	5 days after PD comments
Commission Meeting	10/08/26	Approximately 20 days after PD comments

## **V. CATEGORIZATION**

Cal Advocates agrees with Suburban that the Commission should categorize this proceeding as ratesetting.

## **VI. EX PARTE COMMUNICATIONS**

Pursuant to Rule 8.2(d), the assigned Commissioner may “issue a ruling to prohibit or restrict ex parte communications in a quasi-legislative or rate setting proceeding.” In lieu of individual ex parte communications in this proceeding, the Commission should provide all-party meetings. Limiting communications with decisionmakers to all-party meetings, rather than a series of separate and individual party meetings, will enhance both efficiency and transparency, as well as help ensure decisions are based solely on the evidentiary record.

## **VII. CONCLUSION**

The Commission should adopt the scope and schedule herein. Specifically, the schedule should reflect Cal Advocates’ pending PFM in Suburban’s prior GRC, as well as Suburban’s pending 2025 recorded data.

Respectfully submitted,

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