



***Public Advocates Office***  
*California Public Utilities Commission*  
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April 17, 2019

The Honorable David Chiu  
California State Assembly  
State Capitol, 4112  
Sacramento, CA 95814

**Re: AB 1751 (Chiu) – Oppose**

Dear Assemblymember Chiu:

The Public Advocates Office is the independent consumer advocate at the California Public Utilities Commission (CPUC). Our mission is to advocate for the lowest possible rates for customers of California's regulated utilities consistent with safe, reliable service levels and the state's environmental goals.

We respectfully oppose AB 1751, as introduced, which would expedite the approval of small water system acquisitions by larger water utilities.

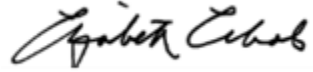
We strongly support the state's goals to ensure that all Californians have access to safe, clean and affordable water. Unfortunately, this bill may not advance these goals because the proposed expedited approval process does not provide ample time to carefully examine these acquisitions which are often controversial, raise legal and policy issues, and can substantially increase customers monthly water bills. As we are the only party representing customers in these acquisitions at the CPUC, a fair and deliberative process is necessary to protect customers, especially lower income customers.

Importantly, this bill may not be necessary to address water quality issues because there is already an expedited process in place that the CPUC uses to approve acquisitions ordered by the State Water Resource Control Board, in instances where water system improvements (e.g., water quality compliance) are necessary. This expedited approval process can take less than 120 days.

While this bill would provide the CPUC with a one-time extension of time to issue a final decision, the CPUC can only employ this extension once, even if utilities are responsible for the delays. The bill's time limits would incentivize utilities to "run down the clock" and employ delay tactics. This impedes our ability to analyze and develop recommendations for CPUC decisionmakers to consider when making informed decisions in the customers' best interests. Also concerning is that it's not clear whether a utility's request is deemed granted if the CPUC fails to act within the bill's specified time limits.

For these reasons, we respectfully oppose this bill. If you have any questions or would like to discuss this matter further, please don't hesitate to contact me at (415) 703-2381 or at [elizabeth.echols@cpuc.ca.gov](mailto:elizabeth.echols@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Echols". The signature is written in a cursive style with a large initial "E".

Elizabeth Echols  
Director