

Docket:	:	A.16-07-002
Exhibit Number	:	ORA - _____
Commissioner	:	M. Picker
Administrative Law Judge	:	S. Park
ORA Witness	:	S. Rose



ORA
OFFICE OF RATEPAYER ADVOCATES



**REPORT AND RECOMMENDATIONS
ON SPECIAL REQUEST #4, SPECIAL REQUEST #10, AND
STEP FILINGS**

Application 16-07-002

**San Francisco, California
February 13, 2017**

TABLE OF CONTENTS

I.	SPECIAL REQUEST #10 – AUTHORIZATION FOR IMPLEMENTATION OF RECYCLED WATER TARIFFS	1
	A. INTRODUCTION	1
	B. SUMMARY OF RECOMMENDATIONS	1
	C. DISCUSSION	2
	1. Cal Am has not provided enough information for the Commission to determine whether it is prudent to approve its proposed recycled water projects.....	2
	2. The Commission’s specifications for the review and approval of recycled water projects are in place for good reason, and should not be bypassed.....	3
	3. Cal Am should explore the possibility of joining regional efforts for recycled water projects.....	4
	4. Authorizing Advice Letter projects disguises the cumulative effect of rate increases.	5
	5. Denial of this request will not hinder Cal Am’s ability to move forward with its conceptual recycled water projects.....	6
	D. CONCLUSION.....	7
II.	SPECIAL REQUEST #4 – ELIMINATION OF SAND CITY SURCHARGE	9
III.	STEP INCREASE FILINGS	11
	A. INTRODUCTION	11
	B. SUMMARY OF RECOMMENDATIONS	12
	C. DISCUSSION	12
	1. The Commission should require Cal Am to file 2019 and 2020 Step Increase filings for each district in which the filing results in a decrease in tariffs.	12
	D. CONCLUSION.....	14
	ATTACHMENT 1: WITNESS QUALIFICATIONS	15

MEMORANDUM

1 The requests and data presented by California American Water (“Cal Am”) in
2 Application (“A.”) A.16-07-002 were examined in order to provide the Commission with
3 recommendations that represent the interests of ratepayers for safe and reliable service at
4 lowest cost. Suzie Rose is ORA’s project lead for the proceeding. Richard Rauschmeier
5 is ORA’s oversight supervisor. Paul Angelopulo and Kerriann Sheppard are ORA’s legal
6 counsels.

7 Although ORA made every effort to comprehensively review, analyze and provide
8 the Commission with recommendations on each ratemaking and policy aspect presented
9 in the application, the absence from ORA’s testimony of any particular issue does not
10 necessarily constitute its endorsement or acceptance of the underlying request,
11 methodology, or policy position related to that issue.

1 **I. SPECIAL REQUEST #10 – AUTHORIZATION FOR IMPLEMENTATION**
2 **OF RECYCLED WATER TARIFFS**

3 **A. INTRODUCTION**

4 In Special Request (“SR”) #10, Cal Am seeks authorization for the ability to
5 provide recycled water in three of its service areas¹ “without going through formal or
6 special application.”² Cal Am requests that the Commission pre-approve the
7 development and deployment of three recycled water projects that are currently in the
8 “conceptual” phase as Tier 2 Advice Letter (AL) capital projects.³ Cal Am
9 acknowledges that Decision (“D.”) 14-08-058, from the Water Recycling Rulemaking
10 (“R.”) 10-11-014 provides a framework, specifications and specific requirements for the
11 review and approval of recycled water projects,⁴ however in SR #10, Cal Am seeks to
12 bypass this adopted Commission process. ORA opposes this request.

13 **B. SUMMARY OF RECOMMENDATIONS**

14 ORA supports facilitating the production, distribution, and use of recycled water,
15 where cost-effective and compatible with the protection of public health. However, the
16 Commission should reject Cal Am’s request to bypass the Commission’s existing criteria
17 for recycled water projects for the following reasons:

- 18 1. Cal Am has not provided enough information for the Commission to
19 determine whether it is prudent to approve the proposed projects.
- 20 2. The Commission’s specifications for the review and approval of recycled
21 water projects are in place for good reason, and should not be bypassed.
- 22 3. Cal Am should explore the possibility of joining regional efforts for
23 recycled water projects before moving forward with its own independent
24 recycled water projects.

¹ Cal Am seeks this authorization in its San Diego, Baldwin Hills and Sacramento service areas.

² Testimony of Jeffrey T. Linam at p. 34 and p.35

³ Ibid at p. 35

⁴ Ibid at pp. 34-35. Linam references D.13-08-058, however the relevant decision is D.14-08-058.

- 1 4. Authorizing Advice Letter projects to be filed outside Cal Am’s General
2 Rate Case (“GRC”) cycle disguises the cumulative effect of rate increases.
3 5. Denial of this request will not hinder Cal Am’s ability to move forward
4 with these conceptual projects.

5 **C. DISCUSSION**

6 **1. Cal Am has not provided enough information for**
7 **the Commission to determine whether it is prudent**
8 **to approve its proposed recycled water projects.**

9 Cal Am requests that the Commission pre-approve three separate recycled water
10 projects as Tier 2 AL projects. The proposed projects are: 1) Baldwin Hills Recycled
11 Water Project (in the Los Angeles District), 2) Coronado/Imperial Beach Recycled Water
12 Project (in the San Diego District), and 3) Sacramento Recycled Water Project (in the
13 Sacramento District). Cal Am acknowledges that the projects are still in the preliminary
14 planning stage,⁵ and refers to the projects as “conceptual projects.”⁶

15 Extreme uncertainty still exists for each of these three recycled water projects. Cal
16 Am has not yet provided the Commission with enough information to make a prudent
17 decision as to whether to approve the proposed projects. Before approving any of the
18 three proposed capital-intensive projects, the Commission must first review the full scope
19 of each project, including the cost-effectiveness of the projects and the potential impacts
20 on potable water rates. Refer to the Testimony of Justin Menda for a discussion of the
21 significant uncertainties associated with each of the recycled water projects in question,
22 including uncertainties related to cost, customer base, and source of recycled water.

23 Based on the significant uncertainty that remains for each of these projects, it
24 would be premature for the Commission to pre-approve any of the proposed recycled
25 water projects at this time.

⁵ Testimony of Mark Schubert, p.161 for Coronado/Imperial Beach. Cal Am confirms this for Baldwin Hills in response to Data Request A.16-07-002 JMI-009, Q.1.a.

⁶ Testimony of Jeffrey T. Linam at p. 34.

1 **2. The Commission’s specifications for the review and**
2 **approval of recycled water projects are in place for**
3 **good reason, and should not be bypassed.**

4 Cal Am acknowledges that in D.14-08-058, the “Decision Adopting a
5 Comprehensive Policy Framework and Minimum Project Criteria Requirements for
6 Recycled Water Projects” from R.10-11-014, the Commission provides a framework,
7 specifications and specific requirements for the review and approval of Recycled Water
8 Projects. Attachment A of D.14-08-058 outlines the minimum criteria requirements
9 (“MCRs”) for proposed recycled water projects, and Attachment B provides the Tier 3
10 AL template (“AL Template”) for proposed recycled water projects. The Commission
11 adopted the MCRs and the AL Template as a result of a rulemaking that included
12 significant stakeholder input, including that of California Water Association and Cal Am.

13 One important issue that was addressed in the rulemaking and is relevant to Cal
14 Am’s SR #10 is as follows: recycled water is generally provided to select customers at
15 the same rate or a lower rate than potable water, however the full cost of the capital
16 projects necessary to serve recycled water are rarely covered by the recycled water rates
17 alone. This generally results in potable water ratepayers subsidizing the cost of recycled
18 water for the select recycled water customers. Therefore, if Cal Am pursues a recycled
19 water project, rates would likely increase for all customers in the service area. All
20 customers in the service area could hypothetically benefit from the increased water
21 supply reliability that the recycled water projects could provide – however, Cal Am has
22 yet to provide the Commission with an assessment of those benefits. The Commission
23 adopted the MCRs and the AL Template to ensure that proposed recycled water projects
24 provide benefit to, and are cost-effective for, potable water ratepayers when water supply
25 considerations, including drought, are taken into account.⁷ Cal Am has not yet provided

⁷ In assessing cost-effectiveness, D.14-08-058 provides for consideration of all non-monetized, non-quantifiable factors (e.g. environmental, supply reliability, social benefits, etc.) specific to the applicant’s service area, as well as the benefits that the project provides to the customers in the service area (e.g., supply reliability, system redundancy, etc.) at pp. A-2 to A-3.

1 the information necessary to assess whether the proposed recycled water projects meet
2 this standard.

3 It is important to note that in addition to providing requirements for review and
4 approval of recycled water projects, D.14-08-058 authorizes Cal Am (and all Class A
5 Water Utilities) to file Tier 3 ALs for recycled water projects, provided that the projects
6 meet three eligibility criteria.⁸ The decision also provides a Tier 2 AL process for the
7 review of recycled water project proposals that have no impact on revenue requirement
8 and on potable customers' rates in the service area where the project is proposed.
9 Therefore, Cal Am already has authorization to file ALs for each of the three proposed
10 recycled water projects (provided they meet the required criteria). In SR #10, Cal Am
11 requests the Commission to pre-approve conceptual projects without providing the
12 information necessary to meet the Commission's specifications for recycled water
13 projects. This authorization is unnecessary and the Commission should deny the request.

14 Ultimately, Cal Am's SR #10 seeks to bypass the requirements of D.14-08-058.
15 However, the requirements of D.14-08-058 are in place for good reason, and the
16 specifications in the MCRs and the AL Template should not be circumvented. Cal Am
17 has not provided the information required by D.14-08-058, and without this information
18 it is not possible to determine if the proposed projects are a wise investment for Cal Am,
19 and cost-effective for ratepayers. It is therefore not possible to determine if these projects
20 should be approved.

21 **3. Cal Am should explore the possibility of joining**
22 **regional efforts for recycled water projects.**

23 D.14-08-058 states “[r]ecycled water projects tend to be more viable or cost-
24 effective when public and private partnerships are formed and/or when public funding is

⁸ D.14-08-058, Ordering Paragraph 20, states “To qualify for the Tier 3 Advice Letter process a proposed recycled water project shall: (1) Be required to have a revenue impact of less than 5% of the proposing Investor-Owned Water and Sewer Utilities’ revenue requirement in the associated ratemaking area; (2) be exempt from review under the National Environmental Protection Act (NEPA) or California Environmental Quality Act (CEQA), or the lead agency must have completed and certified NEPA/CEQA review for the proposed project; and (3) not require direct potable water reuse as defined by Water Code Sections 13560 et seq.” at pp. 44-45.

1 available.”⁹ For this reason, both the MCRs and the AL Template require water utilities
2 proposing recycled water projects to provide information related to regional efforts and
3 public partnerships. Utilities are required to: 1) provide information on existing and
4 planned recycled water operations in the Project’s Integrated Water Resource Planning
5 area; and 2) describe efforts made by the [water utility] or its public partner(s) to seek
6 public funds in grants or low-interest loans.¹⁰

7 Cal Am should explore the possibility of joining regional efforts for recycled
8 water projects, including seeking public funds, as these efforts can serve to increase the
9 viability and cost effectiveness of recycled water projects. This issue provides another
10 example of why the Commission should not allow Cal Am to circumvent the approval
11 process established in D.14-08-058 for recycled water projects.

12 **4. Authorizing Advice Letter projects disguises the**
13 **cumulative effect of rate increases.**

14 Cal Am’s proposed rate increase in its GRC application excludes any rate
15 increases due to ALs filed during that rate case cycle period. Therefore, if AL projects
16 are approved, the rate increase authorized in the GRC does not provide a true
17 representation of the increase in rates that customers will experience over the rate case
18 cycle. Cal Am customers expressed concern and frustration at Public Participation
19 Hearings regarding this issue. For example, one customer in the Monterey District noted:
20 “the process before the PUC deals in silos. [T]his general rate case will exclude a
21 number of issues that...are treated independently and separately by the PUC... in many
22 ways the people who participate in these decision-making silos don’t get the full
23 picture... and yet the impacts of individual silos on the community is what the
24 community feels...”¹¹

⁹ At p.27.

¹⁰ D.14-08-058 at p. A-3 to A-4 and B-4.

¹¹ A.16-07-002 Seaside Public Participation Hearing Transcript, pp. 281-282.

1 Authorizing AL projects within Cal Am’s GRC for which the rate impacts are not
2 included in the GRC rate increase disguises the cumulative effect of the rate increases.

3 **5. Denial of this request will not hinder Cal Am’s**
4 **ability to move forward with its conceptual recycled**
5 **water projects.**

6 Cal Am asserts that its conceptual recycled water projects should be approved in
7 this GRC as AL projects because of a “need for expediency to get conceptual projects
8 moving and reduce potable use in situations where recycled water is acceptable.”¹² Due
9 to this alleged need for expediency, Cal Am asserts that it needs Commission
10 authorization for the development and deployment of these projects.¹³ However,
11 contrary to Cal Am’s assertion, the Commission does not need to approve SR #10 for Cal
12 Am to move forward with these conceptual recycled water projects.

13 Construction for each of these proposed recycled water projects would not occur,
14 even in the best case scenario, until Cal Am’s next rate case cycle.¹⁴ Additionally, if Cal
15 Am is ready to move forward with these projects before its next GRC, D.14-08-058
16 provides authorization for Cal Am to file Tier 2 or Tier 3 ALs for these projects, provided
17 that projects meet the necessary criteria for expedited treatment via AL filing (as
18 discussed above). If the projects do not meet the qualifications for AL treatment, Cal Am
19 can file a separate application, or include the project in its next GRC filing. Once Cal
20 Am has developed a well-formed plan for any of these projects, it can submit the required
21 information to the Commission, receive the appropriate vetting for the projects, and
22 potentially receive authorization to put the project into rates.

23 Lastly, even without filing ALs or a separate application for these projects, Cal
24 Am does not need Commission authorization to move these conceptual recycled water
25 projects forward. Cal Am can move forward with all aspects of the projects except

¹² Testimony of Jeffrey T. Linam at pp. 34-35.

¹³ Ibid at p. 35.

¹⁴ Testimony of Mark Schubert at p. 162 for Coronado/Imperial Beach, p. 156 for Baldwin Hills, and p. 187 for Sacramento.

1 setting rates for the recycled water, then submit to the Commission the request for
2 recovery in rates (including capitalized interest) once the project is complete. Provided
3 that all monies spent were reasonable and prudent, ORA would not object to recovery.

4 Cal Am has multiple avenues of moving its conceptual recycled water projects
5 forward without approval of SR #10. Denial of SR #10 will not hinder progress on these
6 projects.

7 **D. CONCLUSION**

8 In general, ORA supports promoting and facilitating the production, distribution,
9 and use of recycled water, where cost-effective and compatible with the protection of
10 public health. However, significant uncertainties exist in each of Cal Am's three
11 proposed recycled water projects. Cal Am has not provided enough information to
12 determine whether these projects are cost effective and compatible with the protection of
13 public health. The Commission has specific policy measures in place for recycled water
14 projects for good reason, and should not allow Cal Am to bypass these measures. Denial
15 of SR #10 will not hinder progress on Cal Am's conceptual recycled water projects. For
16 the reasons discussed above, the Commission should reject Cal Am's SR #10.

17

1 **II. SPECIAL REQUEST #4 – ELIMINATION OF SAND CITY SURCHARGE**

2 In SR #4, Cal Am requests the elimination of the current Sand City purchased
3 water surcharge, tariff conditions and balancing account, and for the costs to be recovered
4 in the same way as its other purchased water costs.¹⁵ Cal Am asserts that the current
5 process which established the surcharge, tariff conditions, and balancing account is
6 overly complex, unnecessary, and difficult to administer.¹⁶ If SR #4 is adopted, costs for
7 the Sand City production facility will be included in Monterey district base rates and any
8 change in the appropriate cost applicable to the customers will be tracked in the Modified
9 Cost Balancing Account (MCBA).¹⁷ This proposal would eliminate the need for a
10 separate surcharge and balancing account for Sand City purchased water.

11 Cal Am’s SR #4 conforms with the partial settlement agreement included as
12 Attachment B to D.13-04- 015.¹⁸ Additionally, as described in the Testimony of Jeffrey
13 T. Linam, the existing surcharge is extremely complex, making the surcharge difficult to
14 administer and difficult for customers to understand. D.16-12-026, the Commission’s
15 “Decision Providing Guidance on Water Rate Structure and Tiered Rates” from R.11-11-
16 008, provides a detailed list of Goals and Objectives for Balanced Rate Design for
17 Commission regulated water utilities. One of the stated goals/objectives is:

18 Simplify rate design, customer notices, and customer bills while providing
19 necessary information for customers to make wise choices about their use, and
20 transparent information about water service costs and the regulatory process.¹⁹

21 Eliminating the Sand City surcharge and recovering costs through base rates
22 should serve to further this goal by simplifying tariffs and making bills easier for
23 customers to understand. Therefore, ORA does not oppose Cal Am’s SR #4.

¹⁵ Testimony of Jeffrey T. Linam at p. 16.

¹⁶ Ibid at p. 17.

¹⁷ Ibid at p. 18.

¹⁸ As detailed in the Testimony of Jeffrey T. Linam at pp. 17-18.

¹⁹ D.16-12-026, Attachment A at p. 1, Goal/Objective #3.

1 **III. STEP INCREASE FILINGS**

2 **A. INTRODUCTION**

3 The Rate Case Plan for Class A Water Utilities, adopted in D.04-06-018 and
4 revised in D.07-05-062, directs decisions for General Rate Cases to include standard
5 ordering paragraphs providing for Class A Water Utilities to file for escalation year
6 increases (“Step Increase filings”), subject to an earnings test. As stated in the Rate Case
7 Plan in regards to decisions for General Rate Applications: “In addition to relevant issues
8 raised in the proceeding, each decision[,]. . . unless deviation is otherwise expressly
9 justified in the decision, shall include standard ordering paragraphs providing for
10 escalation year increases subject to an earnings test.”²⁰ The Rate Case Plan further
11 specifies that Step Increase filings “shall be sought by Tier 1 advice letter no later than 45
12 days prior to [the] first day of the escalation year.”²¹

13 As discussed in the Testimony of Justin Menda, Cal Am did not complete
14 numerous projects that were authorized by its last GRC, and funded by customers in
15 rates. While a utility underspending its authorized rate base is not in and of itself
16 problematic, any differences between recorded and authorized rate base are not reflected
17 in rates until the next GRC decision (i.e. if Cal Am were to underspend its authorized rate
18 base from this proceeding, the differences would not be reflected until TY 2021).
19 Recorded rate base is considered in the Step Increase filings as a component of the
20 calculation of the Pro Forma Rate of Return,²² and if a utility is significantly
21 underspending its authorized rate base and as a result over-earning, it can result in a rate

²⁰ The Revised Rate Case Plan for Class A Water Utilities, adopted in D.07-05-062, at p.13. The Rate Case Plan adopted in D.04-06-018 is provided as Appendix A of D.07-05-062.

²¹ The Rate Case Plan and Minimum Data Requirements for Class A Water Utilities (The Revised Rate Case Plan), adopted in D.07-05-062, at p.A-19. The Rate Case Plan and Minimum Data Requirements for Class A Water Utilities is provided as Appendix A of D.07-05-062.

²² DWA’s October 19, 1993 letter entitled “Appropriate Method for Determining Pro-Forma Rate of Return (Revised)” states: “The correct ratebase calculation should be based on the recorded 13-month weighted average of the rate base components.” This 1993 letter is included in the 1995 memo entitled “New Procedures for Filing Step Increase, Attrition, and Offset Advice Letters,” and referenced as “describ[ing] the pro-forma process in more detail.”

1 decrease. However, unless otherwise specified by the decision in this proceeding, Cal
2 Am would not be required to submit a Step Increase filing to adjust its revenue
3 requirement and tariffs downward, and could choose not to submit a Step Increase filing
4 that would result in a rate decrease.

5 **B. SUMMARY OF RECOMMENDATIONS**

6 The Commission should require Cal Am to file 2019 and 2020 Step Increase
7 filings in each district for which the filing results in a decrease in tariffs.

8 **C. DISCUSSION**

9 **1. The Commission should require Cal Am to file**
10 **2019 and 2020 Step Increase filings for each district**
11 **in which the filing results in a decrease in tariffs.**

12 As quoted above, the Rate Case Plan mandates that decisions for General Rate
13 Applications include standard ordering paragraphs providing for escalation year increases
14 subject to an earnings test.²³ The Revised Rate Case Plan states that:

15 The most recent memorandum entitled, ‘Estimates of Non-labor and Wage
16 Escalation Rates’ as described in D.04-06-018, shall be used for Escalation
17 Years 1 and 2 rate increase requests and shall be sought by Tier 1 advice
18 letter no later than 45 days prior to the first day of [the] escalation year.²⁴

19 However, neither the Rate Case Plan nor the Revised Rate Case Plan *require* that
20 investor-owned water utilities submit Step Increase filings to revise revenue requirement
21 and tariff schedules. If the decision for this General Rate Application does specify
22 otherwise, Cal Am may choose whether or not to submit Step Increase filings for each of
23 its districts. Cal Am could therefore choose to submit Step Increase filings for the
24 districts in which it is under-earning, thereby increasing rates in those districts, while
25 choosing not to submit Step Increase filings for the districts in which it is over-earning,
26 thereby avoiding a rate decrease in these districts – and likely continuing to over-earn in
27 those districts.

²³ Rate Case Plan for Class A Water Utilities, p.16.

²⁴ Rate Case Plan and Minimum Data Requirements for Class A Water Utilities, p.A-19.

1 This issue is of particular concern in situations when a utility’s recorded rate base
2 is less than its authorized rate base. Step Increase filings require the use of *recorded* rate
3 base in the calculation of the Pro-Forma Rate of Return. The Pro-Forma Rate of Return is
4 then used to determine whether the utility is over-earning or under-earning, thereby
5 determining if a full step increase is justified.²⁵ In practice, all other things being equal,
6 if a utility’s recorded rate base during the Pro-Forma period is significantly less than the
7 authorized rate base for that year, the Pro-Forma Rate of Return will most likely be
8 higher than the Authorized Rate of Return, and the utility will not be able to take the full
9 step increase for the upcoming year. If the utility has significantly over-earned in the
10 previous year, it may be required to decrease rates for the upcoming year.

11 The exact amount that rates are increased or decreased in the step increase filings
12 depends on a variety of factors, including recorded and authorized revenues, authorized
13 and adjusted expenses, and estimated customer growth. Many of these factors are further
14 “trued-up” to actual revenues and expenses in Cal Am’s Water Revenue Adjustment
15 Mechanism (WRAM) filings. However, the previous year’s recorded rate base and the
16 upcoming year’s authorized rate base play a significant role in determining the revenue
17 requirement, and are not incorporated into the WRAM filings. For the two test years
18 (2018 and 2019 in the instant proceeding), the Step Increase filings serve as the
19 mechanism for adjusting rates to compensate for differences between the authorized rate
20 base and recorded rate base.

21 Ultimately, if Cal Am’s recorded rate base is lower than its authorized rate base in
22 a given district, a Step Increase filing could result in a rate decrease. However, without a
23 specific provision in this GRC requiring Cal Am to submit Step Increase filings for
24 districts in which the filing could result in a rate decrease, Cal Am could choose not to
25 file for these districts, and continue to over-earn. Cal Am could also choose to submit

²⁵ The Rate Case Plan D.04-08-014 states at p.14: “The escalation year increase shall be decreased to the extent the pro-forma rate of return exceeds the authorized rate of return for the 12 months ending in September for January filers and in April for July filers prior to the escalation year.”

1 Step Increase filings for districts in which the filing results in a rate increase, thereby only
2 revising its revenue requirement in districts for which the rates would increase.

3 If Cal Am is to be given the option of revising its revenue requirement in Step
4 Increase filings for districts in which rates will increase, it should be required to revise
5 revenue requirements in districts in which rates will decrease. ORA recommends that the
6 language included in the GRC decision in relation to Step Increase filings state: “For
7 escalation years 2019 and 2020, California American Water Company shall file Tier 2
8 advice letters in conformance with General Order 96-B proposing new revenue
9 requirements and corresponding revised tariff schedules for each district in which the
10 filing may result in a rate decrease for that district.”

11 **D. CONCLUSION**

12 The Commission should require Cal Am to file 2019 and 2020 Step Increase
13 filings for each district in which the filing results in a decrease in tariffs. If Cal Am is
14 given the option of revising its revenue requirement in Step Increase filings for districts
15 in which rates will increase, it should be required to revise revenue requirements for
16 districts in which rates will decrease.

Attachment 1: Witness Qualifications

QUALIFICATIONS AND PREPARED TESTIMONY OF SUZIE ROSE

Q.1 Please state your name and business address.

A.1 My name is Suzie Rose and my business address is 505 Van Ness Avenue, San Francisco, California 94102.

Q.2 By whom are you employed and in what capacity?

A.2 I am a Senior Utilities Engineer in the Communications and Water Policy Branch of the Office of Ratepayer Advocates.

Q.3 Briefly describe your pertinent educational background.

A.3 I received a Bachelor of Science Degree in Civil and Environmental Engineering from the Duke University. I received my Professional Engineer License in Civil Engineering in the State of California in 2014.

Q.4 Briefly describe your professional experience.

A.4 I joined the Office of Ratepayer Advocates Water Branch in February 2012. My previous relevant professional experience includes working as an Assistant Engineer at East Bay Municipal Utilities District in Oakland, CA where I worked for two years in the Division of Water Recycling and Wastewater Planning, and working as a Consulting Engineer for O'Brien & Gere Engineers in Landover, Maryland for two years, where I specialized in water treatment and distribution. I have previously testified in the California American Water Monterey Peninsula Water Supply Project Application, the California American Water 2015 General Rate Case, the Golden State Water Company 2016 General Rate Case, and the California American Water Monterey Rate Design Application.

Q.5 What is your responsibility in this proceeding?

A.5 I am the project lead for this proceeding, and prepared testimony for Special Request #4, Special Request #10, and on recommendations related to Step Increase filings.

Q.6 Does that conclude your direct testimony?

A.6 Yes, at this time.