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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of  
California-American Water Company  
(U210W) for an Order Authorizing and  
Imposing a Moratorium on Water Service  
Connections in the Laguna Seca Subarea of  
its Monterey County District.

Application No. 19-\_\_\_\_\_

**APPLICATION OF CALIFORNIA-AMERICAN WATER COMPANY (U210W)  
FOR AN ORDER AUTHORIZING AND IMPOSING A MORATORIUM ON WATER  
SERVICE CONNECTIONS IN THE LAGUNA SECA SUBAREA OF ITS MONTEREY  
COUNTY DISTRICT**

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July 2, 2019

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CONNECTIONS IN THE LAGUNA SECA SUBAREA OF ITS MONTEREY COUNTY  
DISTRICT**

**I. INTRODUCTION**

California-American Water Company (“California American Water”)respectfully submits this Application for an Order Authorizing and Imposing a Moratorium on Water Service Connections in the Laguna Seca Subarea of its Monterey County District (“Application”) to comply with the withdrawal limitations set by the Seaside Groundwater Basin Adjudication, Monterey County Superior Court Case No. M66343. The Laguna Seca Subarea moratorium would apply to new or expanded water service connections until the existing moratorium on the Monterey Main System expires.

**II. FACTUAL AND PROCEDURAL BACKGROUND AND NECESSITY FOR RELIEF**

**A. California American Water’s Monterey County District**

California American Water’s Monterey County District is made up of several distinct water systems. The water systems include Monterey Main, Ryan Ranch, Hidden Hills, and Bishop.

As the California Public Utilities Commission (“Commission”) recently recognized:

Water supply on the Monterey Peninsula is available largely from rainfall

1 and has long been constrained due to frequent drought conditions on the  
2 semi-arid Peninsula. Water supply constraints have been extensively  
3 documented and have existed for decades on the Monterey Peninsula.<sup>1</sup>

4 Unlike many regions of the State, in terms of water resources, Monterey is in an isolated  
5 area where all available water is obtained locally through groundwater or surface methods. No  
6 imported water is available, thus making the area prone to drought conditions and reduced  
7 availability of supplies based on weather conditions. Water supply for the Monterey County  
8 District is primarily developed from shallow wells in the Carmel Valley, mid-depth and deep  
9 wells in the Seaside Basin, and deep wells along the Highway 68 corridor. Production from  
10 these sources is limited by government orders, court adjudications, and annual rainfall amounts.  
11 The two key regulatory limitations on water production for the Monterey County District are: (1)  
12 the State Water Resources Control Board's ("SWRCB") Carmel River Orders, including Order  
13 No. WR 95-10 ("Order 95-10"), Order No. WRO 2009-0060 (the "Cease and Desist Order" or  
14 "CDO"), and Order No. WRO 2016-0016 (the "Amended CDO"), and (2) the Amended  
15 Decision issued in the Seaside Basin Adjudication (the "Amended Decision").  
16

17 **1. State Water Resources Control Board Order 95-10, CDO and**  
18 **Amended CDO**

19 In 1995, the SWRCB issued Order 95-10, which found that California American Water's  
20 Carmel River Valley wells were producing water subject to the SWRCB's permitting authority,  
21 and that California American Water's water rights authorized diversion of only 3,376 acre feet  
22 per year. On that basis, the SWRCB concluded that California American Water did not have the  
23 legal right to about 10,730 acre-feet annually of its then-current diversions from the Carmel  
24 River. In 2009, SWRCB issued the CDO requiring California American Water eliminate all  
25 non-permitted diversions for the Carmel River by no later than December 31, 2016, which  
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27  
28 <sup>1</sup>D.18-09-017, *Decision Approving a Modified Monterey Peninsula Water Supply Project, Adopting Settlement Agreements, Issuing Certificate of Public Convenience and Necessity and Certifying Combined Environmental Report*, as modified by D.19-01-051, p.4.

1 amounts to nearly a 70 percent curtailment of water diversions. In 2016, SWRCB issued the  
2 Amended CDO, imposing a lower annual Carmel River diversion limit, adopting a new  
3 compliance schedule and requiring all unauthorized diversions from the Carmel River end by  
4 December 31, 2021. The Amended CDO imposes further, “one-for-one” Carmel River diversion  
5 reductions as the Pure Water Monterey Project is brought on-line.

6 Condition 2 of the 2009 CDO prohibits diversions from the Carmel River for new  
7 connections or certain increased uses. Consistent with Condition 2, in Decision 11-03-048 the  
8 Commission authorized a moratorium for the Monterey Main System on new service  
9 connections and increased use of water at existing service addresses resulting from a change in  
10 zoning or use. Pursuant to California American Water’s tariffs, the Monterey Main System  
11 moratorium:

12 ...shall expire at the filing by California-American Water Company of a Tier 1  
13 advice letter with the Commission transmitting the written concurrence of the  
14 Deputy Director of Water Rights of the State Water Resources Control Board  
15 with California-American Water Company’s finding that a permanent supply of  
River water.

## 16 2. The Monterey Peninsula Water Supply Project

17 In Application (“A.”) 12-04-019, California American Water sought Commission  
18 authorization to construct and operate the Monterey Peninsula Water Supply Project  
19 (“MPWSP”) in response to the CDO. In Decision (D.) 18-09-017, the Commission granted  
20 California American Water a Certificate of Public Convenience and Necessity (“CPCN”) for the  
21 MPWSP, including a desalination plant at a size of 6.4 million gallons per day. The Commission  
22 concluded “that a CPCN is needed to authorize Cal-Am to construct and operate the MPWSP so  
23 that it may replace water supplies for Cal-Am’s Monterey District in response to the CDO issued  
24 by the [SWRCB] to cease excess diversions from the Carmel River by December 31, 2021, meet  
25 reasonable demand... provide a reliable and secure supply, include a reasonable ‘buffer’ against  
26 uncertainties, and satisfy all other reasonable needs.”<sup>2</sup>

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<sup>2</sup> D.18-09-017, pp.68-69.

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**B. California American Water’s Laguna Seca Subarea and the Seaside Groundwater Basin Adjudication**

The Laguna Seca Subarea of the Seaside Groundwater Basin (“Basin”) is currently the source of water for California American Water’s Ryan Ranch, Hidden Hills and Bishop service areas. California American Water has six groundwater wells located within the Laguna Seca Subarea.

In August 2003, California American Water filed a complaint in Monterey Superior Court, Case No. M66343, seeking appointment of a Watermaster and adjudication of the groundwater rights for the Basin on the basis that use was exceeding replenishment and there was an imminent risk to water supply and quality. Despite the necessity of continued extractions from the Basin, it was apparent that the then existing level of Basin production was likely not sustainable and could lead to long-term overdraft and chronically lowered water levels leading to negative and irreversible Basin impacts – most notably seawater intrusion.

In February 2007, the Superior Court issued the Amended Decision, finding that Basin pumping must be reduced over time to avoid adverse Basin impacts. For California American Water and other producers, the decision required reduction in Basin production over a fifteen-year period in order to prevent seawater intrusion. Specifically, California American Water’s pumping rights were reduced from more than 4,000 acre-feet per year to about 1,500 acre-feet annually. The mandatory reductions are felt more heavily in the Laguna Seca Subarea, in which California American Water’s authorized pumping allocation was reduced to zero in 2018. The chart below illustrates California American Water’s court-ordered allocation limits.

Seaside Groundwater Basin Adjudication Allocations: Water Years 2006-2026

California American Water Share (AFY)

Water Year	Coastal Subareas (AF)	Laguna Seca Subarea (AF)
2006-2008	3,504	345
2009	3,191	271
2010-2011	3,087	246

2012-2014	2,669	147
2015-2017	2,251	48
2018-2020	1,820	0
2021-2023	1,494	0

The Amended Decision established a regional Watermaster board to manage the basin. The Watermaster is charged with administering and enforcing the provisions of the Amended Decision and to that end is required to hold regular meetings. At the time of the adjudication, Watermaster and California American Water believed that an alternate source of water would be available to serve the Laguna Seca Subarea by Water Year 2018.

**C. California American Water’s Laguna Seca Subarea Water Supply Deficit**

As set forth above, the Seaside Groundwater Basin Adjudication set California American Water’s production limits for the Laguna Seca Subarea at zero starting in Water Year 2018, which began October 1, 2017. The amount of water available to California American Water during Water Year 2018 and the actual amount produced are provided in the table below. The “target” for the year is California American Water’s adjudicated production rights for Water Year 2018. The “actual” is the metered production in AF from California American Water wells within the Laguna Seca Subarea.

Laguna Seca Subarea Water  
Year 2018

	Target (AF)	Actual (AF)
Oct	0.00	24.00
Nov	0.00	18.60
Dec	0.00	23.59
Jan	0.00	19.19
Feb	0.00	21.64
Mar	0.00	18.48
Apr	0.00	19.67
May	0.00	27.54
Jun	0.00	31.26
Jul	0.00	33.52
Aug	0.00	35.04

Sep	0.00	30.74
Total (AF)	0.00	303.26
Target (AF)	0.00	
Balance (AF)	-303.26	

The actual production of 303.26 AF minus the operating yield of 0.0 AF results in an overproduction of 303.26 AF. Thus, at this time, all Laguna Seca Subarea production is in excess of California American Water’s adjudicated production rights and a moratorium is justified.

Pursuant to the Amended Decision, California American Water may supply the Ryan Ranch and Bishop service areas with water produced from the Coastal Subarea of the Basin, consistent with California American Water’s allocation for the Coastal Subarea. As such, in the short term, once the Main System/Ryan Ranch intertie project is constructed and water from the Pure Water Monterey project is available for delivery, and if sufficient water is also available as a result of Aquifer Storage and Recovery efforts (“ASR”), California American Water intends to help alleviate the Laguna Seca Subarea deficit by supplying existing customers and uses in the Ryan Ranch and Bishop service areas with water produced from the Coastal Subarea. Long-term, California American Water intends to supply all of its systems located within the Laguna Seca Subarea with water from the Main System, using all water sources in its portfolio. However, until the MPWSP is brought on-line and the CDO is lifted, California American Water may only use its Basin supply to serve demands in the Laguna Seca Subarea, with use of native Coastal Subarea groundwater to help meet demands in the Laguna Seca Subarea further stretching California American Water’s limited water supplies until the CDO is lifted.

General Order 103-A, at Section II.2.B.(3)a., states that a system’s facilities shall have the capacity to meet the source capacity requirements as defined in the Waterworks Standards, CCR Title 22, Section 64554, or its successor. If, at any time, the system does not have this capacity, the utility shall request a service connection moratorium until such time as it can demonstrate the source capacity has been increased to meet system requirements. Here, the amount of water allocated to the Laguna Seca Subarea by the adjudication is legally insufficient



1 for new and extended uses, which justifies issuance of the requested moratorium.

2 California American Water’s practice has been to continue to produce water from the  
3 Laguna Seca Subarea and incur replenishment assessments for over-production. However, this  
4 practice is no longer available now that California American Water’s Laguna Seca allocation has  
5 reached zero. Under the Amended Decision, a producer must pay replenishment assessments for  
6 any water produced in excess of its base water right (i.e. its share of the natural safe yield) but  
7 within its share of the operating yield.<sup>3</sup> In years where replenishment water is available, a  
8 producer may produce in excess of its share of the operating yield, but must pay an additional  
9 replenishment assessment on that water.<sup>4</sup> In years where replenishment water is unavailable, all  
10 producers, including California American Water, are enjoined from any over-production beyond  
11 the operating yield.<sup>5</sup> A producer whose allocation has been reduced to zero is not allowed to  
12 engage in over-production by paying a replenishment assessment, even if replenishment water is  
13 available. Further, producers are enjoined from producing except pursuant to a right authorized  
14 by the Amended Decision.<sup>6</sup>

15 **D. Past and On-Going Efforts to Correct the Supply Deficit**

16 Until the MPWSP is online, the only source water outside of the Basin that could be  
17 provided to the Laguna Seca Subarea would be from the Carmel River. However, California  
18 American Water's use of this source water is constrained by the CDO and cannot support new  
19 connections until the MPWSP is complete. As explained above, California American Water may  
20 be able to physically serve water to existing customers in the Ryan Ranch and Bishop service  
21 areas with groundwater produced from the Coastal Subarea of the Basin once the Bishop/Ryan  
22 Ranch intertie project is constructed and water from the Pure Water Monterey project is available  
23 for delivery to California American Water’s customers, if sufficient ASR water is available.  
24 Until that time, and given no other currently viable options, California American Water will  
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26 <sup>3</sup> See *Amended Decision*, Exhibit A, Section III.A.28, “Replenishment Assessment” and Section III.j.iii,  
27 “Artificial Replenishment and Replenishment Assessments.”

<sup>4</sup> *Id.*

28 <sup>5</sup> *Id.* at Section III.D, “Injunction of Unauthorized Production.”

<sup>6</sup> *Id.* at Section III.D, “Injunction of Unauthorized Production.”

1 serve its existing customers with groundwater produced from the Laguna Seca Subarea. Even  
2 with the Bishop/Ryan Ranch interconnect, the available water to serve these two locations would  
3 be dependent on the available stored ASR water from previous rains. Additionally, the  
4 interconnect would not extend to Hidden Hills, which would still be served from the Laguna  
5 Seca Subarea. Consequently, a combination of building the interconnect and implementing the  
6 moratorium would be the most prudent approach for the Laguna Seca Subarea.

7 Even though California American Water’s allocation for the Laguna Seca Subarea  
8 groundwater has been at zero since Water Year 2018, and despite the more stringent Carmel  
9 River diversion limits imposed in the Amended CDO, California American Water continues to  
10 receive requests for new or expanded water service connections with Water Connection Permits  
11 being issued by the Monterey Peninsula Water Management District (“MPWMD”).

12 In direct response to this situation and recognizing that an alternative water supply would  
13 not be available when anticipated, California American Water requested a moratorium on service  
14 connections in the Laguna Seca Subarea in A.16-07-002, the Company’s general rate case  
15 application for test year 2018, which request was supported by MPWMD. In D.18-12-021, the  
16 Commission found that California American Water failed to provide sufficient notice of the  
17 moratorium to its customers and did not present sufficient information to support a moratorium  
18 because the Company did not explain why it could not rely on “payment of replenishment  
19 assessments to the Watermaster or through importation of non-native water to the Seaside  
20 Basin.”<sup>7</sup> The Commission concluded that “Cal-Am may renew [its moratorium] request in a  
21 new application or in its next GRC if it provides appropriate notice to potentially affected  
22 customers.”<sup>8</sup> This Application addresses those concerns by (1) demonstrating, as set forth  
23 above, that payment of replenishment assessments or importation of non-native water are not  
24 viable solutions, and (2) providing notice to Laguna Seca Subarea customers and property  
25 owners as described below.

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28 <sup>7</sup> D.18-12-021, p.24.

<sup>8</sup> D.18-12-021, p.24.

1 **III. REQUESTED RELIEF**

2 California American Water now seeks Commission authorization to:

3 (A) impose a moratorium in its Laguna Seca Subarea service areas (which includes the  
4 Ryan Ranch,<sup>9</sup> Hidden Hills, and Bishop systems) on new or expanded water service  
5 connections until the existing Monterey Main System moratorium expires;

6 (B) modify its Monterey County District tariffs to include a special condition authorizing  
7 California American Water to refuse to connect new or expanded water service connections in its  
8 Laguna Seca Subarea service areas; and

9 (C) supply water to new or expanded service connections after the moratorium's  
10 effective date, provided that any such service had obtained all necessary written approvals  
11 required for project construction and connection to California American Water's water system  
12 prior to that date.

13 With no allocated Laguna Seca Subarea source water, and the restrictions in the  
14 Amended CDO, California American Water cannot justify setting new meters resulting in  
15 increased system consumption in contravention of the adjudication. Setting new service  
16 connections or expanding existing connections is risky and unreliable given California American  
17 Water's current water supply situation and is contrary to the intent and objectives of the CDO,  
18 Amended CDO, and Amended Decision. Additionally, as explained above, importation of non-  
19 native water is not a solution.

20 Because prospective customers are still obtaining water permits from MPWMD, and in  
21 compliance with the Commission's directive in D.18-12-021, California American Water files  
22 this Application. To address any concerns regarding notice, California American Water intends  
23 to provide the notice attached hereto as Attachment A and described in greater detail below. In  
24 addition, and before the filing of this Application, California American Water invited  
25 representatives from several Homeowner Associations in its Laguna Seca Subarea to a  
26 presentation at its offices to discuss this Application and the requested relief. A representative

27 \_\_\_\_\_  
28 <sup>9</sup> Although the Ryan Ranch service area currently has a service connection moratorium imposed by  
MPWMD, it is possible the MPWMD moratorium may be lifted prior to implementation of the MPWSP.

1 from County Supervisor Mary Adams’s office attended the meeting. Three representatives from  
2 MPWMD were also present.

3 The basis for this application includes, but is not limited to, Public Utilities Code Section  
4 451 (prohibiting unreasonable discrimination in service); General Order 103-A, sections  
5 II.2.B.(3) (requiring public utilities to ensure the system meets 22 C.C.R. Section 64554); and *In*  
6 *Re Southern California Water Company*, D.91-04-022 (allowing a connection moratorium when  
7 a wholesale water supplier to a regulated utility ordered a connection moratorium without the  
8 regulated utility declaring its own water shortage emergency).

9 The Commission has the authority under Section 451 to authorize difference in service  
10 when those differences are not undue, unjust or unreasonable. If California American Water  
11 were to continue to connect new customers in the Laguna Seca Subarea despite a production  
12 allocation of zero, California American Water will be forced to continue the unreliable existing  
13 practice that does not conform to the intent and objectives of the CDO and Seaside Groundwater  
14 Basin Adjudication. Therefore, absent a court order modifying the production rights established  
15 by the Seaside Groundwater Basin Adjudication, a reasonable basis exists to refuse service to  
16 prospective customers of California American Water’s systems served with water produced from  
17 the Laguna Seca Subarea.

18 California American Water has not implemented the procedures specified in Chapter 3 of  
19 Division 1 of the California Water Code, commencing with Water Code section 350, prior to  
20 filing this application as those procedures are inapplicable to this Application.

21 For the reasons described in this Application, California American Water respectfully  
22 requests, after notice and a full opportunity for public comment, that a special condition be  
23 placed in its tariffs for Laguna Seca Subarea allowing California American Water to refuse  
24 service to new or expanded water connections.

#### 25 **IV. COMPLIANCE WITH CEQA**

26 Action by the Commission on this Application is either not subject to or is exempt from  
27 the California Environmental Quality Act (“CEQA”).

28 Action by the Commission on this application is not subject to CEQA because the

1 requested action is ministerial. The requested action seeks authorization to comply with the  
2 Amended Decision; there is no opportunity for the Commission to shape California American  
3 Water's compliance with that order in a manner that might address environmental impacts of the  
4 adjudication.<sup>10</sup>

5 Action by the Commission on this application would enforce General Order 103-A. Such  
6 action is categorically exempt from CEQA pursuant to 14 C.C.R. § 15321, which exempts  
7 actions to enforce a law, general rule, standard or objective administered or adopted by a  
8 regulatory agency.

9 **V. CATEGORY, HEARING, ISSUES AND PROPOSED SCHEDULE [RULE 2.1(C)]**

10 **A. Category**

11 California American Water proposes the category for this proceeding is ratesetting.

12 **B. Are Evidentiary Hearings Necessary?**

13 California American Water believes that evidentiary hearings are not necessary because  
14 this Application does not raise any material issue of fact or law. The necessity for the requested  
15 authorization has been demonstrated. California American Water intends to introduce the  
16 following items in support of the Application:

- 17 1. This Application, copies of which have been or will be delivered to the Commission.
- 18 2. Prepared witness qualifications and direct testimony of Christopher Cook, Central  
19 Division Director of Operations for California American Water, to support the  
20 reasonableness and prudence of the Application.
- 21 3. Prepared and oral rebuttal testimony and related exhibits if necessary to support  
22 California American Water's specific requests.

23 **C. Issues**

24 There are two issues in the proceeding. The first is whether California American Water  
25 should be allowed to implement a moratorium in the Laguna Seca Subarea. The second is the  
26

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27 <sup>10</sup> See *California American Water v. City of Seaside*, 183 Cal.App.4th 471 (2010); see also *Mountain*  
28 *Lion Foundation v. Fish & Game Commission*, 16 Cal.4th 105 (1997); *Leach v. City of San Diego*, 220  
Cal.App.3d 389 (1990).

1 proper duration of such a moratorium, if a moratorium to be implemented.

2 **D. Safety Considerations**

3 California American Water is committed to the safety of its employees and customers.  
4 This commitment to safety involves efforts to protect system infrastructure and safeguard  
5 customers supplies. This commitment to safety of customer supply supports the requested  
6 moratorium.

7 **E. Schedule**

8 California American Water submits the procedural schedule below for the Commission's  
9 consideration of the relief requested.

10

<b>Event</b>	<b>Date</b>
Application Filed	July 2, 2019
Protests and Responses to the Application	30 Days after Notice
Reply to Protests or Responses	40 Days after Notice
Prehearing Conference	45 Days after Application Filed
Scoping Memo	60 Days after Application Filed
Proposed Decision Issued	150 Days after Application Filed
Commission Decision	180 Days after Application Filed

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21 **VI. OTHER PROCEDURAL REQUIREMENTS**

22 **A. Communications Concerning Application [Rule 2.1(b)]**

23 All communications and correspondence with the Applicants should be directed to:  
24  
25  
26  
27  
28

1 Sarah E. Leeper  
2 California-American Water Company  
3 555 Montgomery Street, Suite 816  
4 San Francisco, CA 94111  
5 Tel: (415) 863-2960  
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San Francisco, CA 94111  
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Fax: (415) 397-1586  
Email: cathy.hongola-  
baptista@amwater.com

8 **B. Description of Applicant [Rule 2.1(a) and Rule 2.2]**

9 California American Water's exact legal name is California-American Water Company.  
10 California American Water, a California corporation, is a Class A public utility water and  
11 wastewater company regulated by the Commission. California American Water provides  
12 regulated water and/or wastewater utility services in parts of San Diego, Los Angeles, Ventura,  
13 Monterey, Sonoma, Yolo, Sacramento, Merced, and Placer counties. California American  
14 Water's principal place of business is 655 W. Broadway, Suite 1410, San Diego, CA 92101-  
15 8494.

16 California American Water filed a certified copy of its articles of incorporation with the  
17 Commission on January 6, 1966 in Application 48170. California American Water filed a  
18 certified copy of an amendment to its articles of incorporation with the Commission on  
19 November 30, 1989, in Application 89-11-036. California American Water filed a certified copy  
20 of a further amendment to its articles of incorporation with the Commission on February 28,  
21 2002, in Application 02-02-030. California American Water filed a certified copy of an  
22 additional amendment to its articles of incorporation with the Commission on April 3, 2017, in  
23 Application 17-04-003. California American Water has not subsequently amended its articles of  
24 incorporation.

25 **VII. SERVICE AND NOTICE**

26 California American Water will serve the Application on the parties identified on the  
27 attached service list, which includes certain parties listed on the Monterey service lists for its last  
28 general rate case (A.16-07-002).

1           Within 15 working days of the California Public Utilities Commission’s Public Advisor’s  
2 Office (“PAO”) approving the notice, California American Water will mail a notice of this  
3 Application to (1) all of its Laguna Seca Subarea customers, and (2) to Laguna Seca Subarea  
4 property owners that are not current California American Water customers, but for which  
5 California American Water has an address, notifying them of the proposed moratorium. A draft  
6 of that notice is set forth in attached Exhibit A. Prior to filing the Application, California  
7 American Water supplied the PAO with drafts of the proposed notice.  
8

9           The recipients of the notice (i) will be furnished the Application number and file  
10 reference, (ii) will be requested to direct any questions to California American Water at its  
11 Central Division office, and (iii) will be advised to communicate in writing with the Commission  
12 if they take exception to this Application or are not satisfied with the information furnished by  
13 California American Water.  
14

15 **VIII. CONCLUSION**

16           For the reasons set forth above, California American Water respectfully requests that the  
17 Commission issue a decision finding that:

- 18           a. California American Water’s Application is granted;
- 19           b. California American Water is authorized to immediately refuse service to new or  
20           expanded connections upon approval of this Application;
- 21           c. California American Water is authorized to file a Tier 1 advice letter within 15  
22           days of a final decision granting this Application to add a special condition to its  
23           Monterey County District tariffs authorizing California American Water:
  - 24                   a. to refuse service to new or expanded connections in the Laguna Seca  
25                   Subarea until the existing Monterey Main System moratorium terminates;  
26                   and
  - 27                   b. to supply water to new or expanded service connections after the  
28                   moratorium’s effective date, provided that any such service had obtained



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all necessary written approvals required for project construction and  
connection to California American Water's water system prior to that date;  
and

d. For such other relief as may be necessary and appropriate.

DATED: July 2, 2019

Respectfully submitted,

By /s/ Cathy Hongola-Baptista

Cathy Hongola-Baptista

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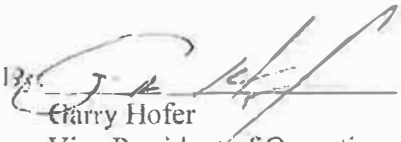
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**VERIFICATION**

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 27, 2019 at Pacific Grove, California.

  
\_\_\_\_\_  
Harry Hofer  
Vice President of Operations  
California-American Water Company