

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 28, 2022

Tiffany Thong
Manger, Rates and Regulatory Affairs
Liberty Utilities (Apple Valley Ranchos Water) Corp.
21760 Ottawa Road
Apple Valley, CA 92308-6533

Dear Ms. Thong,

The Water Division of the California Public Utilities Commission has approved Liberty Utilities' (Apple Valley Ranchos Water) Advice Letter No. 257, filed on November 1, 2021, regarding authorization to implement a 12-month temporary surcharge to recover the combined under-collection recorded in its 2019 WRAM and MCBA, and the residual balance from the 2018 and prior WRAM and MCBA.

Enclosed are copies of the following revised tariff sheets, effective June 10, 2022, for the utility's files:

P.U.C. Sheet No.	Title of Sheet
1166-W	Schedule No. 1 Residential General Metered Service Sheet 2
1167-W	Schedule No. 3 Non-Residential General Metered Service Sheet 2
1168-W	Table Of Contents Sheet 1

Please contact Jefferson Hancock at JHO@cpuc.ca.gov or 415-703-3453, if you have any questions.

Thank you.

Enclosures

**CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS**

Advice Letter Cover Sheet

Utility Name: Liberty Utilities
(Apple Valley Ranchos Water) Corp. **Date Mailed to Service List:** November 1, 2021

District: N/A

CPUC Utility #: U 346-W **Protest Deadline (20th Day):** November 21, 2021

Advice Letter #: 257-W **Review Deadline (30th Day):** December 1, 2021

Tier 1 2 3 Compliance **Requested Effective Date:** December 1, 2021

Authorization D.12-04-048 **Rate Impact:** 3.65%

Description: Liberty Apple Valley requests authorization to implement a 12-month temporary surcharge to recover the combined under-collection recorded in its 2019 WRAM and MCBA, and the residual balance from the 2018 and prior WRAM and MCBA.

The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list. Please see the "Response or Protest" section in the advice letter for more information.

Utility Contact: Edward N. Jackson
Phone: 562.923.0711
Email: Edward.Jackson@libertyutilities.com

DWA Contact: Tariff Unit
Phone: (415) 703-1133
Email: Water.Division@cpuc.ca.gov

Utility Contact: AnnMarie Lett
Phone: 562.923.0711
Email: AnnMarie.Lett@Libertyutilities.com

DWA USE ONLY

<u>DATE</u>	<u>STAFF</u>	<u>COMMENTS</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

[] APPROVED [] WITHDRAWN [] REJECTED

Signature: _____ **Comments:** _____

Date: _____ _____



Liberty Utilities (Apple Valley Ranchos Water) Corp.
21760 Ottawa Road
Apple Valley, CA 92308-6533
Tel: 760-247-6484
Fax: 760-247-1654

Advice Letter No. 257-W

November 1, 2021

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Liberty Utilities (Apple Valley Ranchos Water) Corp. (U 346 W) (“Liberty Apple Valley”) hereby transmits the following revised tariff sheets applicable to water service in its service territory.

Summary

This advice letter filing requests authorization to implement a temporary surcharge to the water rates in Liberty Apple Valley’s Service Area. Liberty Apple Valley is seeking a temporary surcharge of \$0.224 per Ccf for the domestic metered customers for a 12-month period. The surcharge is designed to recover the net of the under-collection recorded in the 2019 Water Revenue Adjustment Mechanism (“WRAM”) and the Modified Production Cost Balancing Account (“MCBA”), and the residual balance from the 2018 and prior WRAM and MCBA. This request is made pursuant to the Commission’s direction in Decision (“D”) 08-02-036, dated February 28, 2008 and D.12-04-048, dated April 19, 2012.

Background and Discussion

Test Year 2019 General Rate Case Proceeding

On January 2, 2018, Liberty Apple Valley filed a Test Year 2019 GRC application with an effective date of July 1, 2019. Liberty (Park Water) Corp. (“Liberty Park Water”) similarly filed a GRC application (A.18-01-003). On February 13, 2018, Liberty Apple Valley and Liberty Park Water filed a motion to consolidate these proceedings. On March 16, 2018, the assigned Administrative Law Judge (“ALJ”) issued a ruling granting the motion to consolidate these proceedings. On June 13, 2018, the assigned Commissioner issued a Scoping Memo and Ruling that authorized a 20-month deadline of September 2, 2019 to resolve the consolidated proceeding. Public participation hearings were held on October 28, 2018. Evidentiary hearings were held during the week of November 5, 2018. Liberty Apple Valley filed its opening and reply briefs on December 12, 2018 and January 11, 2019 respectively. Liberty Apple Valley and the Public Advocates Office (previously known as the Office of Ratepayer Advocates) filed the Joint Comparison Exhibit on January 25, 2019. On March 19, 2019, the ALJ granted interim rate relief and the establishment of a memorandum account to track the difference between interim rates and the final approved rates.

On August 15, 2019, the Commission issued D.19-08-036 extending the statutory deadline from September 2, 2019 to March 2, 2020. On February 27, 2020, the Commission issued D. 20-02-067 extending the statutory deadline from March 2, 2020 to September 2, 2020. On August 27, 2020, the Commission issued D.20-08-049 extending the statutory deadline from September 2, 2020 to October 10, 2020. On September 24, 2020, the Commission issued D.20-09-019 authorizing the 2019 revenue requirement for Liberty Apple Valley and Liberty Park Water.

WRAM/MCBA

In D.08-02-036, dated September 18, 2008, the Commission adopted the Settlement Agreement between Liberty Apple Valley (then Apple Valley Ranchos Water Company) and the Public Advocates Office (then Division of Ratepayer Advocates) dated June 20, 2008 in proceeding A.08-01-002. D.08-09-026 adopted a program for Liberty Apple Valley consisting of a conservation rate design and related mechanisms for decoupling sales and revenue (WRAM and MCBA). The WRAM and MCBA were effective January 1, 2009, the effective date of D.08-09-026. In D.12-04-048 the Commission modified D.08-09-026 by authorizing an 18-month amortization schedule for the net balance recorded in the WRAM and MCBA.

The purpose of the WRAM is to track the difference between adopted and actual commodity rate revenue excluding revenue for fire service, miscellaneous fees, and gravity irrigation water service. The purpose of the MCBA is to track the difference between adopted and actual costs for the following variable costs: purchased power, leased water rights, replenishment assessments (pump tax), and chemicals. The MCBA captures variations in production costs due to either changes in unit price or changes in consumption.

Liberty Apple Valley provides water service from its wells that are located within the Mojave Ground Water Basin. The Mojave Water Agency (“MWA”), the water master of the Mojave Basin, in accordance with the terms of the adjudication of that basin, uses a “water year” that runs from October 1 to September 30. MWA uses a retroactive calculation methodology to administer the adjudication and assess pumping fees.

March 2020 Surcredit

On April 1, 2019, Liberty Apple Valley filed Advice Letter (“AL”) 234-W, which requested approval to implement a surcredit of \$424,745 to refund the net over-collected balance recorded in the 2017 and 2018 WRAM/MCBA. On April 29, 2019, the Water Division suspended AL 234-W until January 2020.

On January 28, 2020, Liberty Apple Valley submitted AL 234-A, which stated that it was “being made to incorporate changes as discussed with Water Division” and that it “will replace Advice Letter 234-A in its entirety.” AL 234-W-A explained that “actual amounts are currently unavailable for the 2017-2018 water year” and that Liberty Apple Valley would true-up estimates in a future advice letter filing. Based on Liberty Apple Valley’s estimates through the end of December 2019, AL 234-W-A requested approval for a one-time surcredit of \$551,868.

On February 19, 2020 Water Division approved Advice Letter 234-W-A. Liberty Apple Valley refunded \$556,316 to customers through a one-time surcredit in March 2020.

Remaining Recovery Required to Close WRAM and MCBA Accounts for Years 2016-2019

On November 2, 2020, Liberty Apple Valley submitted AL 247-W, which requested approval to implement a temporary surcharge to recover the net of the under-collection recorded in the 2019 WRAM and MCBA and the residual balances recorded in the 2016, 2017, and 2018 WRAM/MCBA. AL 247-W proposed to true-up the 2016, 2017, and 2018 WRAM/MCBA balances because the expenses and unamortized account balances had been finalized and the

estimates could be revised to actual amounts. There were no protests filed in opposition to AL 247-W.

Water Division rejected AL 247-W based on the assumption that the 2016, 2017 and 2018 WRAM and MCBA were zeroed out and closed by AL 234-W-A. This assumption is incorrect. AL 234-A explicitly stated that Liberty Apple Valley would true-up estimates in a future advice letter filing. The actual amounts for the 2017-2018 water year were not available at the time AL 234-A was prepared and therefore the estimates contained in the advice letter were subject to true-up in a future advice letter filing. In addition to the expense estimates, AL 234-W-A included a partial true-up of the 2017 WRAM/MCBA surcharge (the surcharge approved in Advice Letter 228-W). The 2017 WRAM/MCBA surcharge included the following *estimated* components subject to further true-up:

- WRAM/MCBA balance for calendar year 2017;
- WRAM/MCBA balance for calendar year 2016;
- Unamortized WRAM/MCBA balance for calendar year 2016 from the ongoing (then active) 2016 WRAM/MCBA surcharge;
- Residual WRAM/MCBA balance for calendar year 2015 from the expired 2015 WRAM/MCBA surcharge; and
- Residual WRAM/MCBA balance for calendar year 2014 from the expired 2014 WRAM/MCBA surcharge.

Because of the estimates described above, the residual account balances for 2016-2018 provided in AL 234-W-A were subject to further true-up in a future advice letter. The account balances for 2018 and prior years can now be trueed up, zeroed out and closed because there are no ongoing surcharge/surcredit, which makes it possible to finalize the residual account balances and the prior expense estimates. For the years of 2009 – 2018, Liberty Apple Valley was authorized recovery totaling \$11,694,085 (net of under-collections and over-collections), excluding interest. For the same period, Liberty Apple Valley billed customers \$11,285,012 (net of surcharges and surcredits) through December 31, 2020. Therefore, a recovery of the shortfall of \$485,731, with interest through August 31, 2021, is required to zero out and close the 2016, 2017 and 2018 WRAM and MCBA balancing accounts.

Liberty Apple Valley has also completed a true-up of the make-up water assessment and leased water rights expense for water year 2019-2020 to actual amounts. Because of the retroactive calculation methodology used by the MWA to administer the adjudication and levy replacement water obligations (leased water rights) and the replenishment assessment, actual amounts were not previously available. The final true-up for the 2019 WRAM and MCBA accounts, with interest through August 31, 2021, shows an under-collection of \$380,641. Therefore, a recovery of the shortfall of \$380,641 is required to zero out and close the 2019 WRAM and MCBA balancing accounts.¹

¹ Advice Letter 252-W-A, submitted on October 15, 2021, seeks authorization to implement a temporary surcredit to refund the net over-collected balance recorded in the 2020 WRAM and MCBA.

Summary of Requests Made in This Advice Letter

Per D. 08-02-036 and D.12-04-048, the Commission authorized recovery for under-collection in the WRAM and MCBA. As explained above, and as supported by Liberty Apple Valley's workpapers, there is an under-collection in the final balances for the WRAM and MCBA for years 2016 - 2019. Recovery of the amount of under-collection will permit Liberty Apple Valley to zero out and close the WRAM and MCBA for years 2016-2019.

Liberty Apple Valley proposes to combine the balances in the following accounts:

- the residual under-collection recorded in the 2018 and prior WRAM/MCBA
- the under-collection recorded in the 2019 WRAM/MCBA

With interest through August 31, 2021, the residual under-collection recorded in the 2018 and prior WRAM and MCBA is \$485,731.

With interest through August 31, 2021, the under-collection recorded in the 2019 WRAM and MCBA is \$380,641.

The total of the above balances is a net under-collection of \$866,372 (\$485,731 + \$380,641) or 3.65% of Liberty Apple Valley's 2020 adopted revenue requirement.

Liberty Apple Valley is therefore requesting recovery of \$866,372 or 3.65% of its adopted 2020 revenue requirement. Liberty Apple Valley proposes to recover the under-collection recorded in the WRAM/MCBA through a 12-month surcharge of \$0.224 per Ccf applicable to domestic service for schedules PR-1-R, residential metered service and PR-1-NR, non-residential metered service.

The Commission Staff has been provided with workpapers developing the balances in the WRAM/MCBA. Supporting documentation of the authorized and billed/refunded amounts are included in the workpapers. The calculation of the surcharge is also included in the workpapers.

Tier Designation

Pursuant to D.07-01-024, this advice letter is submitted with a Tier 1 designation.

Requested Effective Date

Pursuant to General Rule 7.3.2 of General Order 96-B, Liberty Apple Valley requests this filing become effective on December 1, 2021.

Notice and Service

In accordance with General Order 96-B, General Rules 4.3 and 7.2 and Water Industry Rule 4.1, a copy of this advice letter will be mailed or electronically transmitted on November 1, 2021 to competing and adjacent utilities and other utilities or interested parties having requested such notification.

In accordance with Resolution W-4664, notice is not required. Liberty Apple Valley will

include notice of the rate change within the bill during the first billing period the increase is in effect.

Response or Protest

Anyone may respond to or protest this advice letter. When submitting a response or protest, please include the utility name and advice letter number in the subject line. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter. A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

- (1) The utility did not properly serve or give notice of the advice letter;
- (2) The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
- (3) The analysis, calculations, or data in the advice letter contain material error or omissions;
- (4) The relief requested in the advice letter is pending before the Commission in a formal proceeding; or
- (5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
- (6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory (provided that such a protest may not be made where it would require re-litigating a prior order of the Commission).

A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

A response or protest must be made in writing or by electronic mail and must be received by the Division of Water and Audits within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3rd floor
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
water.division@cpuc.ca.gov

On the same date, the response or protest is submitted to the Water Division, the respondent or protestant shall send a copy by mail (or e-mail) to us, addressed to:

Edward N. Jackson
Director, Rates and Regulatory Affairs
Liberty Utilities (West Region)
9750 Washburn Road
P. O. Box 7002
Downey, CA 90241
Fax: (562) 861-5902
E-Mail: AdviceLetterService@libertyutilities.com

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Division of Water and Audits within the 20-day protest period so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

If you have not received a reply to your protest within 10 business days, contact Edward Jackson at (562) 923-0711.

Very truly yours,

LIBERTY UTILITIES (APPLE VALLEY RANCHOS WATER) CORP.

/s/ Edward N. Jackson

EDWARD N. JACKSON
Director, Rates and Regulatory Affairs

ENJ/al

Attachments

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
1166-W	SCHEDULE NO. 1 RESIDENTIAL GENERAL METERED SERVICE Sheet 2	1107-W, 1108-W
1167-W	SCHEDULE NO. 3 NON-RESIDENTIAL GENERAL METERED SERVICE Sheet 2	1109-W, 1110-W
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SCHEDULE NO. 1

RESIDENTIAL GENERAL METERED SERVICE

16. As authorized by the California Public Utilities Commission, an amount of \$0.277 per Ccf is to be added to the quantity rate for a period of 12 months, beginning on the effective date of Advice Letter 248-W. This surcharge will recover the under collection in the Consolidated Expense Balancing Account as of December 31, 2020.
17. As authorized by the California Public Utilities Commission, an amount of \$4.43 surcredit per customer is to be added to the Customer's bill for a period of 12 months, beginning on the effective date of Advice Letter 248-W. This surcredit will refund the over collection in the Employee and Retiree Healthcare Balancing Account and Tangible Property Regulations Consequences Memorandum as of December 31, 2017.
18. As authorized by the California Public Utilities Commission, an amount of \$4.06 surcredit per customer is to be added to the Customer's bill for a period of 12 months, beginning on the effective date of Advice Letter 248-W. This surcredit will refund the over collection in the Pension Expense Balancing Account as of December 31, 2017.
19. As authorized by the California Public Utilities Commission, an amount of \$0.078 per Ccf is (N) to be added to the quantity rate for a period of 16 months, beginning on the effective date Advice Letter 249-W. This surcharge will recover the under collection in the Interim Rates Memorandum Account as of November 19, 2020.
20. As authorized by the California Public Utilities Commission, a one-time surcredit is to be added to the Customer's bill beginning on the effective date of Advice Letter 252-W-A. This surcredit is to refund the over collection in the WRAM and MCBA as of December 31, 2020.

The table below shows the surcredits for each meter size.

Meter Size	One-Time Surcredit
5/8"	\$ 20.25
3/4"	\$ 30.38
1"	\$ 50.63
1 1/2"	\$ 101.25
2"	\$ 162.00
3"	\$ 303.75
4"	\$ 506.25
6"	\$1,012.50
8"	\$1,620.00
10"	\$2,936.25

21. As authorized by the California Public Utilities Commission, an amount of \$0.224 per Ccf is to be added to the quantity rate for a period of 12 months, beginning on the effective date of Advice Letter 257-W. This surcharge will recover the under-collection in the WRAM and MCBA as of December 31, 2019.

(N)
 |
 (N)

SCHEDULE NO. 3

NON-RESIDENTIAL GENERAL METERED SERVICE

16. As authorized by the California Public Utilities Commission, an amount of \$0.277 per Ccf is to be added to the quantity rate for a period of 12 months, beginning on the effective date of Advice Letter 248-W. This surcharge will recover the under collection in the Consolidated Expense Balancing Account as of December 31, 2020.
17. As authorized by the California Public Utilities Commission, an amount of \$4.43 surcredit per customer is to be added to the Customer's bill rate for a period of 12 months, beginning on the effective date of Advice Letter 248-W. This surcredit will refund the over collection in the Employee and Retiree Healthcare Balancing Account and Tangible Property Regulations Consequences Memorandum as of December 31, 2017.
18. As authorized by the California Public Utilities Commission, an amount of \$4.06 surcredit per customer is to be added to the Customer's bill for a period of 12 months, beginning on the effective date of Advice Letter 248-W. This surcredit will refund the over collection in the Pension Expense Balancing Account as of December 31, 2017.
19. As authorized by the California Public Utilities Commission, an amount of \$0.078 per Ccf is to be added to the quantity rate for a period of 16 months, beginning on the effective date of Advice Letter 249-W. This surcharge will recover the under collection in the Interim Rates Memorandum Account as of November 19, 2020.
20. As authorized by the California Public Utilities Commission, a one-time surcredit is to be added to the Customer's bill beginning on the effective date of Advice Letter 252-W-A. This surcredit is to refund the over collection in the WRAM and MCBA as of December 31, 2020.

The table below shows the surcredits for each meter size.

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2"	\$ 162.00
3"	\$ 303.75
4"	\$ 506.25
6"	\$1,012.50
8"	\$1,620.00
10"	\$2,936.25

21. As authorized by the California Public Utilities Commission, an amount of \$0.224 per Ccf is to be added to the quantity rate for a period of 12 months, beginning on the effective date of Advice Letter 257-W. This surcharge will recover the under-collection in the WRAM and MCBA as of December 31, 2019.

(N)
 |
 (N)

TABLE OF CONTENTS

The following listed tariff sheets contain all effective rates and rules affecting the charges and service of the utility, together with other pertinent information:

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Service Area Map-Apple Valley Ranchos		653-W
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<u>Rate Schedules:</u>		
Schedule No. 1	Residential General Metered Service-Apple Valley	1098-W, 1166-W (T)
Schedule No. 1 YE-R	Residential General Metered Service-Yermo	1100-W, 1083-W
Schedule No. 2	Gravity Irrigation Service	1099-W, 1084-W
Schedule No. 3	Non-Residential General Metered Service-Apple Valley	1101-W, 1167-W (T)
Schedule No. 3 YE-NR	Non-Residential General Metered Service-Yermo	1102-W, 1086-W
Schedule No. 4	Non-Metered Fire Services	1103-W, 1087-W
Schedule No. 5	Fire Flow Testing Charge	850-W
Schedule No. LC	Late Payment Charge	1028-W
Schedule 14.1	Water Shortage Contingency Plan	804-W through 810-W
Schedule UF	Surcharge to Fund PUC Reimbursement Fee	1031-W
Schedule CAP	Customer Assistance Program	1093-W, 1094-W
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LIST OF CONTRACTS AND DEVIATION:

<u>Rules:</u>		
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No. 2	Description of Service	159-W
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No. 4	Contracts	361-W
No. 5	Special Information Required on Forms	1022-W, 1023-W, 1001-W, 1002-W
No. 6	Establishment and Re-establishment of Credit	362-W
No. 7	Deposits	711-W, 730-W
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No. 12	Information Available to Public	366-W, 367-W
No. 13	Temporary Service	368-W, 369-W
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No. 16	Service Connections, Meters, and Customer Facilities	399-W through 405-W

(Continued)

**LIBERTY UTILITIES (APPLE VALLEY RANCHOS WATER) CORP.
ADVICE LETTER 257-W
SERVICE LIST**

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dcron@applevalley.org

Manuel Benitez
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