





Liberty Utilities (Apple Valley Ranchos Water) Corp.  
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Advice Letter No. 289-W

January 30, 2026

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

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

**Summary**

Pursuant to General Order 96-B, Water Industry Rules 7.3.1 and 8.1, and Public Utilities Code §§ 1001, 851, and 2718-2720, Liberty Apple Valley respectfully requests Commission authorization to expand its certificated service area to include approximately 1,415 acres located adjacent to Liberty Apple Valley’s certificated boundary.

The revised service area map includes a distinct area where property owners have requested water service from Liberty Apple Valley.

This request seeks to extend water service to the tracts/parcels as indicated in the table below, where property developers and owners have requested Liberty Apple Valley service. This request includes a total of 181 parcels covering approximately 1,415 acres, consisting of a mixture of residential, commercial, and industrial parcels.

Description	Assessor’s Parcel Number	No. of Parcels	Acreage
Area 1: Along 15 Fwy Frontage Rd, Stoddard Wells Rd, and Apple Valley Rd	0472-031-08,0472-031-60,0472-031-61,0472-031-62,0472-031-63,0472-031-64,0472-031-65,0472-051-10,0472-051-36,0472-061-26,0472-182-09,0472-191-01,0472-191-02,0472-201-01,0472-201-03	15	518
Area 2: Along Stoddard Wells Rd, Johnson Rd	0463-201-20,0463-201-32,0463-201-39,0463-201-43,0463-201-44,0463-201-54,0463-201-56,0463-241-02,0463-241-03,0463-241-05,0463-241-06,0463-241-07,0463-241-09,0463-241-11,0463-241-13,0463-241-15,0463-241-16,0463-241-19,0463-241-26,0463-241-34,0463-241-39,0463-241-40,0463-241-42,0463-242-02,0463-242-05,0463-243-01,0463-243-20,0463-243-25	15	161

Description	Assessor's Parcel Number	No. of Parcels	Acreage
Area 3: Area East of Central Rd, South of Quarry Rd, and North of Los Padres Rd	0463-201-20,0463-201-32,0463-201-39,0463-201-43,0463-201-44,0463-201-54,0463-201-56,0463-241-02,0463-241-03,0463-241-05,0463-241-06,0463-241-07,0463-241-09,0463-241-11,0463-241-13,0463-241-15,0463-241-16,0463-241-19,0463-241-26,0463-241-34,0463-241-39,0463-241-40,0463-241-42,0463-242-02,0463-242-05,0463-243-01,0463-243-20,0463-243-25	28	514
Area 4: Along Otoe Rd, Dale Evans Pkwy, and Waalew Rd	0437-213-04,0437-213-07,0437-213-08,0437-213-56,0437-213-66,0437-213-67,0440-014-03,0440-014-04,0440-014-05,0440-014-08,0440-014-30,0440-014-33,0441-011-14,0441-011-26,0441-011-39	15	56
Area 5: Along Cahuilla Rd East of Central	0437-341-79,0437-341-83,0437-352-44,0437-352-66,0437-352-68,0437-353-43,0437-353-44,0437-353-48,0437-353-49,0437-531-14,0437-531-16,0437-531-20,0437-531-51,0437-531-52,0437-545-06,0437-545-24,0437-545-25,0437-545-26,0437-545-27,0437-545-28,0437-545-29,0437-545-30,0437-545-31,0437-545-35,0437-546-37,0437-546-39,0437-546-40	27	70
Area 6: East of Central Rd, along Tenaya Rd, South of Standing Rock Rd and North of Klickitat	0437-062-26,0437-062-32,0437-062-42,0437-062-51,0437-242-09,0437-242-10,0437-242-12,0437-242-13,0437-242-14,0437-681-01,0437-681-02,0437-681-03,0437-681-04,0437-681-05,0437-681-06,0437-681-07,0437-681-08,0437-681-09,0437-681-10,0437-681-11,0437-681-12,0437-681-13,0437-681-14,0437-681-15,0437-681-16,0437-681-17,0437-681-18,0437-681-19,0437-681-20,0437-681-21,0437-681-22,0437-681-23,0437-681-24,0437-681-25,0437-681-26,0437-681-27,0437-681-28,0437-681-29,0437-681-30,0437-681-31,0437-681-32,0437-681-33,0437-681-34,0437-681-35,0437-681-36,0437-681-37,0437-681-38,0437-681-	71	57

Description	Assessor's Parcel Number	No. of Parcels	Acreage
	39,0437-691-01,0437-691-02,0437-691-03,0437-691-04,0437-691-05,0437-691-06,0437-691-18,0437-691-19,0437-691-20,0437-691-21,0437-691-22,0437-691-23,0437-691-24,0437-691-25,0437-691-26,0437-691-27,0437-691-34,0437-691-35,0437-691-36,0437-691-37,0437-691-38,0437-691-39,0437-691-40		
Area 7: Along South side of Bear Valley Rd, along Grande Vista St, and Apple Valley Rd	0434-021-10,0434-021-37,0434-032-06,0434-032-07,0434-032-08,0434-032-28,0434-042-06,0434-191-80,0434-191-82,0434-201-40	10	39
Total		181	1,415

The owners are aware of their financial responsibilities in seeking water service. New facilities required to provide service in this area will be financed in accordance with the provisions of the Commission's Rule No. 15.

**Background**

Liberty Apple Valley is a Class A investor-owned utility serving approximately 24,000 customers in Apple Valley and nearby unincorporated areas under a CPCN granted by the CPUC.

The subject territory lies adjacent to Liberty Apple Valley's certificated boundary.

In 2024 and 2025, Liberty Apple Valley received written service requests from developers and property owners representing active and pending construction projects in the area.

On September 18, 2025, the San Bernardino County Local Agency Formation Commission (LAFCO) issued a determination identifying a service-area conflict between Liberty Apple Valley and the City of Victorville for seven specific parcels. LAFCO did not find conflicts for the remaining parcels included in Liberty Apple Valley's proposed service area expansion.

While Liberty Apple Valley acknowledges LAFCO's finding, the CPUC maintains exclusive jurisdiction over investor-owned utility service territories. Liberty Apple Valley submits that serving the area is consistent with the public convenience and necessity under § 1001 and avoids undue delay in regional development.

The City of Victorville acted as the lead agency under the California Environmental Quality Act (CEQA) and adopted a Mitigated Negative Declaration (Sch #20241001).<sup>1</sup> Liberty Apple Valley adopts this document as a Responsible Agency.

The primary source of water supply to serve the proposed service area expansion will be groundwater from the Alto Subarea of the Mojave Water Basin. The Mojave Water Basin is an adjudicated groundwater basin (City of Barstow v. City of Adelanto, Case No. 208568 Riverside Superior Court) and is supported by the physical solution in that case administered by the Court appointed Watermaster, the Mojave Water Agency (“MWA”). According to the MWA 2020 Urban Water Management Plan Update (“2020 Plan”), MWA has extended the planning horizon considered in its 2020 Plan from the statutorily required twenty-year timeline to a much longer forty-five-year period through 2065. This extended planning horizon allows MWA and the regional retail water purveyors to address longer-term land use planning, water planning, and infrastructure considerations.<sup>2</sup>

Ultimately, the availability of water supplies for Liberty Apple Valley to meet the demand associated with the proposed service area expansion is dependent upon MWA’s ability to manage the basin and to implement additional water projects and management actions necessary to continue to recharge the groundwater basin, maintain groundwater levels, and protect groundwater quality. MWA’s 2020 Plan concludes, “MWA has sufficient available regional supplies to meet the regional demands through 2065”.<sup>3</sup> However, the owners are aware that in the event that mandatory conservation and/or limitations are necessary, the proposed project would adhere to any and all limitations associated with potential reductions in supply.

### **Public Convenience and Necessity**

Under Public Utilities Code § 1001, Liberty Apple Valley must demonstrate that the proposed extension serves the public convenience and necessity. Liberty Apple Valley submits the following findings:

1. Documented Customer Need. Customer Need. Developers and property owners within the proposed area have submitted written requests supporting Liberty Apple Valley service. Each letter affirms (a) Liberty Apple Valley’s proximity and capability to serve immediately, and (b) that Victorville Water has not committed to provide service within a reasonable timeframe.
2. Adequate Infrastructure and Reliability. Serving the proposed area through Liberty Apple Valley will require developer-funded infrastructure. However, Liberty Apple Valley’s nearby distribution system allows for more efficient service, with less new infrastructure required compared to Victorville. On the Victorville side, substantial new facilities—including pipelines, booster stations, and storage tanks—would need to be constructed to provide adequate service pressure and reliability.

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<sup>1</sup> [https://files.ceqanet.lci.ca.gov/319864-1/attachment/PGw2XLK3UB6xUIcYQvX9Qo9WWI\\_lotjfZmaliA5IKRpLN2\\_bbqO8w8e8-TiAuSWXygTubI4btJqUVvZL0](https://files.ceqanet.lci.ca.gov/319864-1/attachment/PGw2XLK3UB6xUIcYQvX9Qo9WWI_lotjfZmaliA5IKRpLN2_bbqO8w8e8-TiAuSWXygTubI4btJqUVvZL0)

<sup>2</sup> Mojave Water Agency, 2020 Urban Water Management Plan (UWMP), ES-3.

<sup>3</sup> Mojave Water Agency, 2020 Urban Water Management Plan (UWMP), 6-2.

3. **Avoidance of Duplicative Facilities.** No parallel or overlapping mains are proposed. Liberty Apple Valley's extension will interconnect with existing infrastructure, consistent with CPUC policy against duplication (D.83-04-061), thereby minimizing the need for redundant facilities and streamlining service delivery.
4. **Public Benefits.** Approving this expansion will facilitate timely construction of much-needed residential and commercial projects, advancing local housing and employment goals. If commercial development occurs within Victorville's incorporated limits, this will also generate additional tax revenue for the City of Victorville, further benefiting the local community. Delays in water service provision risk undermining these public benefits.
5. **Regulatory Precedent.** CPUC Decisions D.00-10-029 (SCWC – Bolsa Chica) and A.08-08-022 (GSWC – Sutter Pointe) illustrate that extensions by IOUs may be approved where municipalities cannot provide timely service.

### **Relationship to LAFCO Determination**

The San Bernardino LAFCO letter, dated September 18, 2025, found a potential overlap between Liberty Apple Valley's proposed service area and Victorville's sphere of influence. Liberty Apple Valley acknowledges this finding but emphasizes that LAFCO's statutory authority under the Cortese-Knox-Hertzberg Act applies to cities and special districts, not CPUC-regulated investor-owned utilities. The CPUC retains independent authority to determine whether Liberty Apple Valley's service advances the public interest, particularly where customers are requesting service and timely supply is unavailable from the municipality.

The Commission Staff has been provided with supporting documentation consistent with Standard Practice SP-U-18-W, Standard Practice for Water Supply and Certification Questionnaire.

### **Tier Designation**

This service area expansion advice letter is submitted as Tier 2 designation.

### **Effective Date**

Liberty Apple Valley requests this filing become effective on March 1, 2026.

### **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 was electronically transmitted on January 30, 2026 to competing and adjacent utilities and other utilities or interested parties having requested such notification.

A copy of this advice letter has also been transmitted to the Local Agency Formation Commission.

### **Response or Protest**

Anyone may respond to or protest this advice letter. 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 upon 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;
- (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 Water Division within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3<sup>rd</sup> Floor  
California Public Utilities Commission  
505 Van Ness Avenue, San Francisco, CA 94102  
[Water.division@cpuc.ca.gov](mailto: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 Liberty Park Water, addressed to:

Tiffany Thong  
Manager, Rates and Regulatory Affairs  
Liberty Utilities  
9750 Washburn Road  
P. O. Box 7002  
Downey, CA 90241  
E-Mail: [AdviceLetterService@libertyutilities.com](mailto:AdviceLetterService@libertyutilities.com)

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division 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 Tiffany Thong at [Tiffany.Thong@libertyutilities.com](mailto:Tiffany.Thong@libertyutilities.com).

Sincerely,

LIBERTY UTILITIES (APPLE VALLEY RANCHOS WATER) CORP.

*/s/ Tiffany Thong*

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Tiffany Thong  
Manager, Rates and Regulatory Affairs

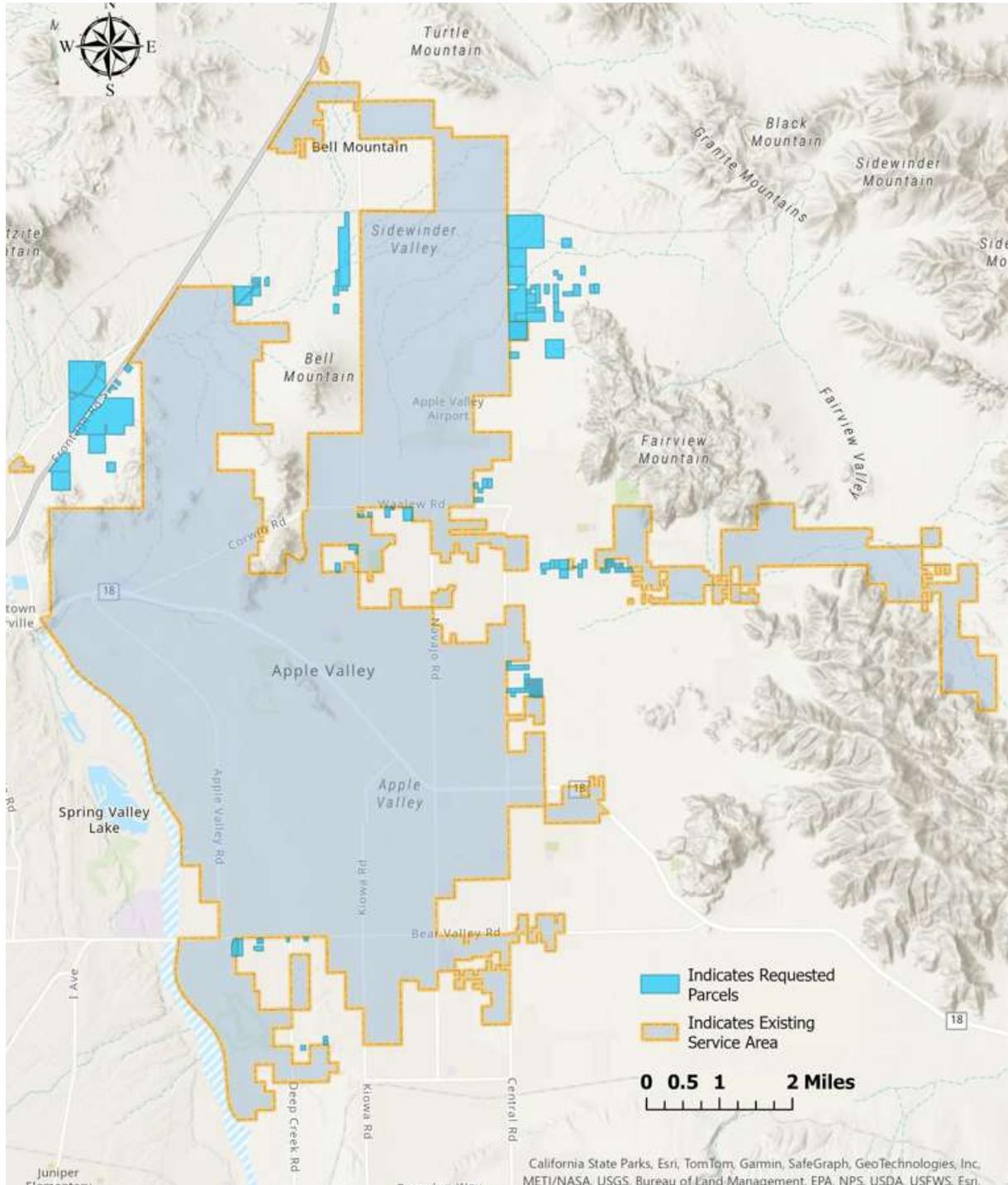
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Enclosures

cc: Hani Moussa, Public Advocates Office, ([Hani.Moussa@cpuc.ca.gov](mailto:Hani.Moussa@cpuc.ca.gov))  
Public Advocates Office, ([PublicAdvocatesWater@cpuc.ca.gov](mailto:PublicAdvocatesWater@cpuc.ca.gov))  
Local Agency Formation Commission (LAFCO), [lafco@lafco.sbcounty.gov](mailto:lafco@lafco.sbcounty.gov)

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
1276-W	LIBERTY APPLE VALLEY SERVICE AREA Sheet 1	1253-W
1277-W	TABLE OF CONTENTS Sheet 1	1275-W

**LIBERTY APPLE VALLEY SERVICE AREA**



**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:

<b><u>Subject Matter of Sheet:</u></b>		<b><u>CPUC Sheet No.</u></b>	
Title Page		900-W	
Table of Contents		1277-W, 1264-W	(T)
Preliminary Statement	845-W, 533-W, 1069-W, 624-W, 914-W, 1104-W, 902-W, 1070-W, 1073-W, 934-W, 994-W, 996-W, 1044-W, 1105-W, 1046-W, 1047-W, 1154-W, 1239-W, 1172-W, 1192-W, 1193-W, 1204-W, 1240-W, 1269-W, 1270-W		
Service Area Map-Apple Valley Ranchos		1276-W-W	(T)
Service Area Map-Yermo		846-W	
<b><u>Rate Schedules:</u></b>			
Schedule No. 1	Residential General Metered Service-Apple Valley	1265-W, 1217-W, 1218-W, 1219-W	
Schedule No. 2	Gravity Irrigation Service	1266-W, 1220-W	
Schedule No. 3	Non-Residential General Metered Service-Apple Valley	1267-W, 1221-W, 1222-W, 1223-W	
Schedule No. 4	Non-Metered Fire Services	1268-W, 1224-W, 1225-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	1133-W through 1135-W, 1172-W, 1137-W through 1139-W, 1173-W	
Schedule UF	Surcharge to Fund PUC Reimbursement Fee	1274-W	
Schedule CAP	Customer Assistance Program	1190-W, 1094-W	
Schedule No. CAP-SC	Customer Assistance Program Sur-Charge	1191-W	
		819-W	

**LIST OF CONTRACTS AND DEVIATION:**

**Rules:**

No. 1	Definitions	999-W, 1000-W	
No. 2	Description of Service	159-W	
No. 3	Application for Service	13-W, 553-W	
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	
No. 8	Notices	1003-W through 1006-W	
No. 9	Rendering and Payment of Bills	689-W, 690-W, 1195-W, 1196-W	
No. 10	Disputed Bills	1007-W, 1008-W	
No. 11	Discontinuance and Restoration of Services	1029-W, 1010-W through 1019-W	
No. 12	Information Available to Public	366-W, 367-W	
No. 13	Temporary Service	368-W, 369-W	
No. 14	Continuity of Service	370-W	
No. 14.1	Water Conservation and Rationing Plan	1141-W through 1152-W	
No. 15	Main Extensions	386-W through 392-W, 529-W, 1044-W, 1045-W, 564-W, 396-W through 398-W, 1178-W, 984-W	
No. 16	Service Connections, Meters, and Customer Facilities	1227-W through 1237-W	

(Continued)

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