

**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:** March 31, 2021

**District:** N/A

**CPUC Utility #:** U 346-W      **Protest Deadline (20<sup>th</sup> Day):** April 20, 2021

**Advice Letter #:** 252-W      **Review Deadline (30<sup>th</sup> Day):** April 30, 2021

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

**Authorization** D.12-04-048      **Rate Impact:** \$347,021  
1.46%

**Description:** Liberty Apple Valley requests authorization to implement a 12-month temporary surcharge to recover the combined under-collection recorded in its 2020 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](mailto:Edward.Jackson@libertyutilities.com)

**DWA Contact:** Tariff Unit

**Phone:** (415) 703-1133

**Email:** [Water.Division@cpuc.ca.gov](mailto:Water.Division@cpuc.ca.gov)

**Utility Contact:** AnnMarie Lett

**Phone:** 562.923.0711

**Email:** [AnnMarie.Lett@Libertyutilities.com](mailto: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WITHDRAWN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. 252-W

March 31, 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:

| <b>CPUC<br/>Sheet No.</b> | <b>Title of Sheet</b>     | <b>Canceling<br/>Sheet No.</b> |
|---------------------------|---------------------------|--------------------------------|
| 1089-W                    | Schedule No. 1, Page 2    | 1063-W                         |
| CANCEL                    | Schedule No. 1, Page 3    | 1082-W                         |
| 1090-W                    | Schedule No. 3, Page 2    | 1066-W                         |
| CANCEL                    | Schedule No. 3, Page 3    | 1085-W                         |
| 1091-W                    | Table of Contents, Page 1 | 1088-W                         |

**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 \$0.090 per Ccf for the domestic metered customers for a 12-month period. The surcharge is designed to recover the net of the over-collection recorded in the 2020 Water Revenue Adjustment Mechanism (“WRAM”) and the Modified Production Cost Balancing Account (“MCBA”), the under-collection recorded in the 2019 WRAM/MCBA and the residual balance from the 2018 and prior WRAM/MCBA. This request is made pursuant to the Commission’s direction in Decision 08-02-036, dated February 28, 2008 and Decision 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.

On March 24, 2020, pursuant to Rule 16.6 of the Commissions' Rules of Practice and Procedure, Liberty Apple Valley requested an extension of time, from March 31, 2020 to until the Commission issued a final decision on Liberty Apple Valley's GRC proceeding, to file an advice letter requesting amortization of the net balance recorded in the 2019 WRAM and MCBA.

On April 2, 2020, the Commission granted Liberty Apple Valley's extension request to file an advice letter to amortize the net balance recorded in its 2019 WRAM and MCBA.

On February 1, 2021, Liberty Apple Valley filed Advice Letter ("AL") 249-W requesting amortization of the under-collection balance recorded in the Interim Rates Memorandum Account. The advice letter was approved on March 4, 2021 with an effective date of March 4, 2021.

### **WRAM/MCBA General Discussion**

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 Division of Ratepayer Advocates ("DRA") 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.

### **WRAM/MCBA for Calendar Year 2020**

Liberty Apple Valley provides domestic 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. Because of the retroactive calculation methodology used by the MWA to administer the adjudication and levy replacement water (leased water rights) and replenishment assessments, actual amounts are currently unavailable for the 2020-

2021 water year and therefore the leased water rights and make-up assessment balances recorded in the MCBA for calendar year 2020 are estimated. Liberty Apple Valley will true-up the estimated balance of leased water rights and the make-up assessment recorded in the MCBA for calendar year 2020 in a future advice letter filing that requests amortization of the combined balance recorded in the WRAM and MCBA for calendar year 2020.

Liberty Apple Valley filed an information-only report with Water Division for the amounts recorded in the WRAM and MCBA during calendar year 2020 on November 30, 2020 detailing the WRAM and MCBA data for nine months, ending September 30, 2020. As compared to the information-only report, this filing includes an updated twelve months of WRAM and MCBA data, ending December 31, 2020, reflecting an adjustment for the Interim Rates Memorandum Account authorized in Liberty Apple Valley's GRC (D.20-09-019, issued date of October 2, 2020), with a total net over-collected balance of \$520,072. The purpose of this adjustment is to ensure that revenues tracked in the Interim Rates Memorandum Account are excluded from the WRAM. With interest through February 28, 2021, the over-collection is \$520,150.

The combined balance recorded in the WRAM and MCBA for the period January 1, 2020 through December 31, 2020 including interest through February 28, 2021, is an over-collection of \$520,150.

#### **WRAM/MCBA for Calendar Year 2018– Advice Letter 234-W**

On April 1, 2019, Liberty Apple Valley filed Advice Letter 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 Advice Letter 234-W until January 2020.

On January 28, 2020, Liberty Apple Valley submitted Advice Letter 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.” Advice Letter 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, Advice Letter 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.

#### **WRAM/MCBA for Calendar Year 2019– Advice Letter 247-W**

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

On December 4, 2020, Water Division rejected AL 247-W based on its belief that AL 234-W-A

had zeroed out the 2016, 2017, and 2018 WRAM/MCBA balances. Water Division did not identify any issues with the balance recorded in the WRAM/MCBA for calendar year 2019.

On December 31, 2020, Liberty Apple Valley filed a request for Commission review of Water Division's rejection of AL 247-W. This request is pending before the Commission. There were no protests filed in opposition to AL 247-W.

Water Division's disposition of AL 247-W is based on a misunderstanding that the 2016, 2017 and 2018 WRAM/MCBA were zeroed out and closed by AL 234-W-A. As previously stated, 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;
- Unamortized WRAM/MCBA balance for calendar year 2016 from the ongoing (then active) 2016 WRAM/MCBA surcharge; and
- Residual WRAM/MCBA balance for calendar year 2015 and prior years from the expired 2015 WRAM/MCBA surcharge.

Because of the estimates listed above, the residual account balances provided in AL 234-W-A were subject to further true-up in a future advice letter.

As stated above, in addition to the request for approval of the 2019 WRAM/MCBA, AL 247-W proposed to true-up the WRAM/MCBA balances through calendar year 2018. For the years of 2009 – 2018, Liberty Apple Valley was authorized recovery of \$11,694,085, excluding interest. For the same period, Liberty Apple Valley has billed customers \$11,285,012 through September 30, 2020. Liberty Apple Valley therefore requests recovery of the shortfall of \$485,363.

As described in AL 247-W, the leased water rights and make-up assessment balances recorded in the MCBA for calendar year 2019 were estimated. In this advice letter, Liberty Apple Valley proposes to revise the balances of the leased water rights and make-up water expense to actual recorded in the MCBA to the extent possible. The leased water rights expense for the 2019-2020 water year has been finalized and there is no change from the estimated to actual. The make-up water expense for 2019-2020 water year is revised to current estimate. The total adjustment was an over-collection of \$1,791. With interest through February 28, 2021, the total adjustment was an over-collection of \$1,626.

### **Summary of Requests Made in This Advice Letter**

Liberty Apple Valley proposes to true-up the 2016, 2017, and 2018 WRAM/MCBA balances. The account balances for 2018 and prior years can now be trued up and zeroed out because there is currently no ongoing surcharge/surcredit, which makes it possible to finalize the residual account balances and the prior expense estimates as contemplated by AL 247-W. Liberty Apple Valley further proposes to amortize the balance recorded in the 2019 and 2020 WRAM/MCBA. 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
- the over-collection recorded in the 2020 WRAM/MCBA

With interest through February 28, 2021, the residual under-collection recorded in the 2018 and prior WRAM/MCBA is \$485,586.

With interest through February 28, 2021, the under-collection recorded in the 2019 WRAM/MCBA is \$381,586.

With interest through February 28, 2021, the over-collection recorded in the 2020 WRAM/MCBA is \$520,150.

The total of the above balances is a net under-collection of \$347,021 ( $\$485,586 + \$381,586 - \$520,150$ ) or 1.46% of Liberty Apple Valley's 2020 adopted revenue requirement.

Liberty Apple Valley is therefore requesting recovery of \$347,021 or 1.46% 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 \$0.090 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 May 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 March 31, 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, 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 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  
Phone: (562) 923.0711, ext. 1212  
Fax: (562) 861-5902  
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 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



**SCHEDULE NO. 1**

**RESIDENTIAL GENERAL METERED SERVICE**

- |    |   |                 |
|----|---|-----------------|
| 4. | 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.  | (L)             |
| 5. | 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. |                 |
| 6. | 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.   |                 |
| 7. | 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 advice Letter 249-W. This surcharge will recover the under collection in the Interim Rates Memorandum Account as of November 19, 2020.   | (L)             |
| 8. | As authorized by the California Public Utilities Commission, an amount of \$0.090 per Ccf is to be added to the quantity rate for a period of 12 months, beginning on the effective date of Advice Letter 252-W. This surcharge will recover the under collection in the WRAM and MCBA as of December 31, 2020.   | (N)<br> <br>(N) |

|                             |                                      |                                 |
|-----------------------------|--------------------------------------|---------------------------------|
| (To be inserted by utility) | Issued By                            | (To be inserted by Cal. P.U.C.) |
| Advice No. <u>252-W</u>     | <u>CHRISTOPHER G. ALARIO</u><br>Name | Date Filed    _____             |
| Dec. No. <u>D.12-04-048</u> | <u>PRESIDENT</u><br>Title            | Effective      _____            |
|                             |                                      | Resolution No. _____            |

LIBERTY UTILITIES  
(APPLE VALLEY RANCHOS WATER) CORP.  
21760 OTTAWA ROAD  
P. O. BOX 7005  
APPLE VALLEY, CALIFORNIA 92307-7005

CANCEL Cal. P.U.C. Sheet No. \_\_\_\_\_  
Canceling ORIGINAL Cal. P.U.C. Sheet No. 1082-W

**SCHEDULE NO. 1**

**RESIDENTIAL GENERAL METERED SERVICE**

- 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. (L)
- 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 Advice Letter 249-W. This surcharge will recover the under collection in the Interim Rates Memorandum Account as of November 19, 2020. (L)

(To be inserted by utility)

Issued By

(To be inserted by Cal. P.U.C.)

|            |                    |                              |                |       |
|------------|--------------------|------------------------------|----------------|-------|
| Advice No. | <u>252-W</u>       | <u>CHRISTOPHER G. ALARIO</u> | Date Filed     | _____ |
|            |                    | Name                         |                |       |
| Dec. No.   | <u>D.12-04-048</u> | <u>PRESIDENT</u>             | Effective      | _____ |
|            |                    | Title                        | Resolution No. | _____ |



LIBERTY UTILITIES  
(APPLE VALLEY RANCHOS WATER) CORP.  
21760 OTTAWA ROAD  
P. O. BOX 7005  
APPLE VALLEY, CALIFORNIA 92307-7005

CANCEL Cal. P.U.C. Sheet No. \_\_\_\_\_  
Canceling ORIGINAL Cal. P.U.C. Sheet No. 1085-W

**SCHEDULE NO. 3**

**NON-RESIDENTIAL GENERAL METERED SERVICE**

- 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. (L)
- 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. (L)

(To be inserted by utility)

Issued By

(To be inserted by Cal. P.U.C.)

|            |                    |                              |                |       |
|------------|--------------------|------------------------------|----------------|-------|
| Advice No. | <u>252-W</u>       | <u>CHRISTOPHER G. ALARIO</u> | Date Filed     | _____ |
|            |                    | Name                         |                |       |
| Dec. No.   | <u>D.12-04-048</u> | <u>PRESIDENT</u>             | Effective      | _____ |
|            |                    | Title                        | Resolution No. | _____ |

**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                              |  | 1091-W, 1027-W   | (T) |
| Preliminary Statement                          |  | 845-W, 533-W, 1069-W, 624-W, 914-W, 1057-W, 902-W, 1070-W,<br>1071-W, 1072-W, 1073-W, 1074-W, 1075-W, 1076-W, 1077-W, 1078-W, 1079-W, 934-W, 1080-W,<br>994-W, 996-W, 1044-W, 1058-W, 1046-W, 1047-W |     |
| Service Area Map-Apple Valley Ranchos          |  | 653-W  |     |
| Service Area Map-Yermo                         |  | 846-W  |     |
| <b><u>Rate Schedules:</u></b>                  |  |  |     |
| Schedule No. 1                                 | Residential General Metered Service-Apple Valley     | 1051-W, 1089-W, Cancel   | (T) |
| Schedule No. 1 YE-R                            | Residential General Metered Service-Yermo            | 1053-W, 1083-W   |     |
| Schedule No. 2                                 | Gravity Irrigation Service                           | 1052-W, 1084-W   |     |
| Schedule No. 3                                 | Non-Residential General Metered Service-Apple Valley | 1054-W, 1090-W, Cancel   | (T) |
| Schedule No. 3 YE-NR                           | Non-Residential General Metered Service-Yermo        | 1055-W, 1086-W   |     |
| Schedule No. 4                                 | Non-Metered Fire Services                            | 1056-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 CARW                                  | California Alternative Rates for Water               | 1041-W, 527-W  |     |
| Schedule No. CARW-SC                           | California Alternative Rates for Water Sur-Charge    | 1042-W   |     |
| <b><u>LIST OF CONTRACTS AND DEVIATION:</u></b> |  | 819-W  |     |

**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 through 691-W, 1033-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                | 831-W through 842-W   |  |
| No. 15   | Main Extensions                                      | 386-W through 392-W, 529-W, 1044-W, 1045-W,<br>564-W, 396-W through 398-W, 983-W, 984-W |  |
| No. 16   | Service Connections, Meters, and Customer Facilities | 399-W through 405-W   |  |

(Continued)

(To be inserted by utility)

Issued By

(To be inserted by Cal.P.U.C.)

Advice No. 252-W

CHRISTOPHER G. ALARIO  
Name

Date Filed \_\_\_\_\_

Decision No. D.12-04-048

PRESIDENT  
Title

Effective \_\_\_\_\_

Resolution No. \_\_\_\_\_

**LIBERTY UTILITIES (APPLE VALLEY RANCHOS WATER) CORP.  
ADVICE LETTER 252-W  
SERVICE LIST**

Jim Hansen  
Navajo Mutual Water Company  
P. O. Box 392  
Apple Valley, CA 92307  
[jhansenjr@email.com](mailto:jhansenjr@email.com)

Town of Apple Valley  
Attention: Frank Robinson  
14955 Dale Evans Parkway  
Apple Valley, CA 92307  
[dcron@applevalley.org](mailto:dcron@applevalley.org)

Manuel Benitez  
County of San Bernardino  
Special Districts Department  
Water and Sanitation Division  
12402 Industrial Blvd.  
Bldg. D, Ste. 6  
Victorville, CA 92392

California Public Utilities Commission  
Attention: Ting-Pong Yuen  
ORA Water  
505 Van Ness Avenue  
San Francisco, CA 94102  
[tpy@cpuc.ca.gov](mailto:tpy@cpuc.ca.gov)

Samuel Martinez  
Executive Officer  
Local Agency Formation Commission  
1170 West 3<sup>rd</sup> Street, Unit 150  
San Bernardino, CA 92415-0490  
[lafco@lafco.sbcounty.gov](mailto:lafco@lafco.sbcounty.gov)

Patrick Scanlon  
Vice President Operations  
Golden State Water Company  
1920 West Corporate Way  
Anaheim, CA 92801  
[Patrick.Scanlon@gswater.com](mailto:Patrick.Scanlon@gswater.com)

Perry Dahlstrom  
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