

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: May 1, 2020

District: N/A

CPUC Utility #: U 346-W

Protest Deadline (20th Day): May 21, 2020

Advice Letter #: 241-W

Review Deadline (30th Day): May 31, 2020

Tier 1 2 3 Compliance

Requested Effective Date: March 4, 2020

Authorization Resolution M-4842

Rate Impact: \$ N/A
% N/A

Description: Liberty Apple Valley submits this advice letter in compliance with Resolution M-4842.

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

Utility Contact: AnnMarie Lett

Phone: 562.923.0711

Phone: 562.923.0711

Email: Edward.Jackson@libertyutilities.com

Email: AnnMarie.Lett@Libertyutilities.com

DWA Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

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WITHDRAWN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. 241-W

May 1, 2020

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Summary

Liberty Utilities (Apple Valley Ranchos Water) Corp. (U 346-W) (“Liberty Apple Valley”) hereby submits this advice letter in compliance with California Public Utilities Commission (“Commission”) Resolution M-4842, dated April 16, 2020. This advice letter confirms compliance with Resolution M-4842 based upon the actions undertaken previously and identifies customer protections listed in the resolution that do not apply in this emergency. Previously, in response to Executive Director Alice Stebbins’s March 17, 2020 letter, “Emergency Customer Protections to Support Customers Affected by the COVID-19 public health emergency,” as well as Decisions (“D.”) 19-07-015 and 19-08-025, Liberty Apple Valley notified the Commission of the activation of its Catastrophic Event Memorandum Account (“CEMA”) and the implementation of emergency customer protections to support residential customers and small businesses impacted by COVID-19 State of Emergency.

Background and Discussion

On March 4, 2020, Governor Gavin Newsom declared a state of emergency¹ in California as part of its response to the COVID-19 pandemic. On March 13, 2020, President Trump signed an Emergency Declaration to facilitate the federal response to the emerging pandemic. On March 19, 2020, Governor Newsom issued an Executive Order N-33-20 to stay home.

On March 17, 2020, Commission Executive Director Alice Stebbins issued a letter, subject to Commission ratification, directing water utilities to extend the “applicable customer protections mandated in D.19-07-015” to customers in response to the declared state of emergency for the COVID-19 crisis.

On March 17, 2020, Liberty Apple Valley notified Executive Director Stebbins, that it was activating its Catastrophic Event Memorandum Account in response to the COVID-19 pandemic (Attachment 1).

On March 24, 2020, Liberty Apple Valley filed Advice Letter 239-W (Attachment 2) reporting the implementation of the applicable emergency customer protections directed in D.19-07-15 to support customers affected by the COVID-19 state of emergency. The advice letter also informed the Commission of the additional customer protections implemented by Liberty Apple Valley not mandated by D.19-07-015 and its public outreach plan of these protections to customers.

¹ Governor Newsom’s Declaration of a State of Emergency, available at:
<https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-helpstateprepare-for-broader-spread-of-covid-19/>.

On April 2, 2020, Governor Newsom issued Executive Order N-42-20 suspending the authority of water utilities to discontinue service for nonpayment to residential customers and small businesses operating in the critical infrastructure sectors.

On April 16, 2020, the Commission issued Resolution M-4842, ratifying the directives issued by Executive Director Stebbins on March 17, 2020, to energy, water, and communications utilities. Ordering Paragraph No. 2 of Resolution M-4842 states the following:

2. To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, electric, gas, communications, and water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter describing all reasonable and necessary actions to implement the emergency customer protections adopted in D.19-07-015 and D.19-08-025 to support California customers.

As discussed above, in response to Executive Director Stebbins' March 17, 2020 letter, Liberty Apple Valley filed Advice Letter 239-W describing all reasonable and necessary actions it has implemented in response to the COVID-19 Emergency.

Resolution M-4842 (page 4) further states:

In addition, we acknowledge that some of the provisions adopted in D.19-07-015 and D.19-08-025 in response to disasters such as earthquakes and wildfires may not apply in the case of a pandemic; for example, the requirement that electric and gas utilities identify the premises of affected customers whose utility service has been disrupted or degraded and discontinue billing these premises without assessing a disconnection charge. **If the electric, gas, communication, and water corporations subject to this Resolution believe that specific provisions from D.19-07-015 and D.19-08-025 do not apply during the pandemic, they shall identify such provisions in their Advice Letters and provide a justification for why they believe the provisions do not apply.** (emphasis added)

Per Resolution M-4842's requirement that utilities identify any customer protection that does not apply to the current emergency, Liberty Apple Valley identifies the following two disaster relief protections in D.19-07-015:

- (6) waive bills for victims who lost their homes or if their homes are rendered uninhabitable; and
- (7) authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.

These protections apply to customers whose real property suffers damage or destruction during a wildfire, earthquake, flood, or other disaster. The pandemic emergency does not damage or destroy real property. Therefore, Liberty Apple Valley has not extended these protections to customers.

Tier Designation

Pursuant to Resolution M-4842, this advice letter is submitted with a Tier 2 designation.

Effective Date

Pursuant to Resolution M-4842, Liberty Apple Valley requests this filing become effective on March 4, 2020.

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 electronically transmitted on May 1, 2020 to competing and adjacent utilities and other utilities or interested parties having requested such notification. During the COVID-19 pandemic, Liberty Apple Valley can only provide electronic copies of this advice letter to the service list. Pursuant to Water Industry Rule 3.2 of General Order 96-B, public notice is not required.

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 Division of Water 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 Liberty Apple Valley, 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 (West Region)
Edward.Jackson@libertyutilities.com

ENJ/aml

Enclosures

**LIBERTY UTILITIES (APPLE VALLEY RANCHOS WATER) CORP.
ADVICE LETTER 241-W
SERVICE LIST**

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Navajo Mutual Water Company
P. O. Box 392
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Town of Apple Valley
Attention: Frank Robinson
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Apple Valley, CA 92307
dcron@applevalley.org

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

California Public Utilities Commission
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Local Agency Formation Commission
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Attachment 1

Letter to Commission's Executive Director, Alice Stebbins, dated March 17, 2020



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

March 17, 2020

VIA EMAIL AND U.S. MAIL
Alice.Stebbins@cpuc.ca.gov

Ms. Alice Stebbins
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Catastrophic Event Memorandum Account

Dear Ms. Stebbins:

Pursuant to Public Utilities Code Section 454.9 and Resolution E-3238 dated July 24, 1991, Liberty Utilities (Apple Valley Ranchos Water) Corp. hereby gives the Commission notice that it is booking costs into its Catastrophic Event Memorandum Account (CEMA). These costs are in response to the COVID-19 pandemic. On March 4, 2020, Governor Gavin Newsom declared a State of Emergency for California to prepare for and respond to the COVID-19 public health emergency.

As part of our pandemic response, we are implementing our emergency plan and quickly adjusting to the COVID-19 situation, responding to customer needs, protecting the health and safety of our employees and customers, and maintaining safe and reliable service for our communities. With the rapidly evolving COVID-19 situation, we are unable at this time to estimate the costs associated with this effort.

If you have any further questions regarding this matter, please feel free to call me at (562) 805-2010.

Very truly yours,

LIBERTY UTILITIES (APPLE VALLEY RANCHOS WATER) CORP.

/s/ Edward N. Jackson

EDWARD N. JACKSON
Director, Rates and Regulatory Affairs

ENJ/al

cc: Bruce DeBerry, Bruce.DeBerry@cpuc.ca.gov
Richard Smith, Richard.Smith@cpuc.ca.gov

Attachment 2

Liberty Apple Valley's Advice Letter 239-W

**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 24, 2020

District: N/A

CPUC Utility #: U 346-W

Protest Deadline (20th Day): April 13, 2020

Advice Letter #: 239-W

Review Deadline (30th Day): April 23, 2020

Tier 1 2 3 Compliance

Requested Effective Date: March 4, 2020

Authorization D.19-07-015

Rate Impact: N/A

Description: Implementation of Emergency Disaster Relief Program for COVID-19.

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

Utility Contact: AnnMarie Lett

Phone: 562.923.0711

Phone: 562.805-2052

Email: Edward.Jackson@LibertyUtilities.com

Email: AnnMarie.Lett@libertyutilities.com

DWA Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

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. 239-W

March 24, 2020

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Summary

Liberty Utilities (Apple Valley Ranchos Water) Corp. (U 346-W) (“Liberty Apple Valley”) hereby submits this advice letter to notify the California Public Utilities Commission (“Commission”) of Liberty Apple Valley’s implementation of emergency customer protections for customers impacted by the COVID-19 pandemic. This advice letter is made pursuant to Decision 19-07-015 implementing a Disaster Relief Program and the Commission Executive Director’s March 17, 2020 letter addressing Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency. This advice letter also informs the Commission of other customer protection measures implemented by Liberty Apple Valley not mandated by D.19-07-015.

Background and Discussion

In D.19-07-015, the Commission established a set of minimum emergency disaster customer protection measures that utilities are directed to implement in the event of a declared emergency. Emergency disaster customer relief protections shall apply to utility customers in affected areas if a state of emergency is declared by the Governor of California or the President of the United States.

On March 4, 2020, Governor Gavin Newsom declared a state of emergency¹ in California as part of its response to the COVID-19 pandemic. On March 13, 2020, President Trump signed an Emergency Declaration to facilitate the federal response to the emerging pandemic. On March 19, 2020, Governor Newsom issued an Executive Order N-33-20 to stay home.

On March 17, 2020, Commission Executive Director Alice Stebbins issued a letter, subject to Commission ratification, directing water utilities to extend the “applicable customer protections mandated in D.19-07-015” to customers in response to the declared state of emergency for the COVID-19 crisis. While COVID-19 has not resulted in the loss or disruption of the delivery or receipt of utility service or the degradation of the quality of utility service, Liberty Apple Valley understands that customers may face economic hardship associated with COVID-19. Therefore, consistent with the proposed directive, Liberty Apple Valley has enacted certain emergency customer protections. Liberty Apple Valley has activated its Emergency Disaster Relief Program (“Program”) and Catastrophic Event Memorandum Account (“CEMA”), effective March 4, 2020, pursuant to the letter from Executive Director Stebbins. Liberty Apple Valley will use the CEMA to record costs associated with its response to COVID-19.

¹ Governor Newsom’s Declaration of a State of Emergency, available at: <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-helpstate-prepare-for-broader-spread-of-covid-19/>.

Eligibility Requirements and Time Limits for Emergency Customer Protections

Liberty Apple Valley will offer the consumer protections described in this letter to all residential and small business customers affected by COVID-19 in its service territory.

With respect to when these protections will end, there are many unknowns as to the full scope and impact of this pandemic. The pandemic has not caused disruption or degradation of service. Liberty Apple Valley is committed to implementing the following protections for up to one year, retroactive to March 4, 2020. This is consistent with D.19-07-015, which mandates that protections conclude no sooner than 12 months from the date of the original emergency declaration. If and when the impacts of the pandemic change, Liberty Apple Valley will file a revised Tier 1 advice letter modifying the time limits on the customer protections described herein.

Description of Adopted Customer Protections

In response to the COVID-19 pandemic, Liberty Apple Valley has implemented the following applicable customer protections identified in D.19-07-015. Liberty Apple Valley customers experiencing economic hardship due to the COVID-19 outbreak will be afforded the following protections:

- Liberty Apple Valley has suspended service disconnections for non-payment for residential and business customers.
- Liberty Apple Valley has waived disconnection and late fees and security deposits to affected customers.
- Liberty Apple Valley has temporarily suspended all California Alternative Rates for Water (CARW) removals and discontinued recertification and verification requests for the CARW program.
- Liberty Apple Valley has encouraged customers who have questions or who may be facing potential hardship to contact customer service. Liberty Apple Valley staff is trained and ready to inform and support customers who may experience financial difficulty because of COVID-19. Liberty Apple Valley offers a variety of payment options and can assist customers with payment arrangements if needed. Customers are encouraged to utilize the payment methods available on Liberty Apple Valley's website and to call with questions at (760) 247-6484.

Customer Communication Plan

Liberty Apple Valley has implemented the following methods of outreach regarding the customer protections described above:

- Liberty Apple Valley has begun notifying customers by website, social media, and direct mail.
- Liberty Apple Valley has started notifying local government and/or elected officials by email that the Program is in effect.
- Liberty Apple Valley has a 24-hour emergency hotline equipped to answer calls from customers seven days a week, 365 days a year.
- Liberty Apple Valley has added a page on its website dedicated to updates. Updates will also be shared via email and social media posts.
- Within 72 hours of the conclusion of this emergency, Liberty Apple Valley will place calls throughout its territory regarding emergency relief customer protections.

Protecting the Health and Safety of Employees and Customers

In addition to the customer protection measures and customer outreach plan described above, Liberty Apple Valley has implemented the following protective measures to safeguard the health and safety of employees and customers:

- Liberty Apple Valley has a pandemic preparedness plan and a task force that is working with guidance from the Centers for Disease Control and Prevention (“CDC”). This task force has spent several weeks preparing for how the virus might impact the organization and communities served and how to respond appropriately.
- Liberty Apple Valley continues to monitor the situation and actively share updates and information with employees (weekly or more often as needed) so they can keep themselves, their families, and their community safe.
- Liberty Apple Valley has deployed social distancing policies, identified key staff, and separated them. Liberty Apple Valley has instituted a remote workplace separation program for those business functions for which this is practicable.
- Liberty Apple Valley has implemented deep cleaning in its offices by using third-party disinfection services.
- Liberty Apple Valley has provided customer service representatives and field personnel with gloves and additional protective supplies and requires social distancing of at least six feet for interactions with customers.
- Liberty Apple Valley has limited employee travel, suspended in-person meetings, and postponed larger gatherings and events.
- Liberty Apple Valley requires employees to follow the CDC recommendations on personal safety, such as frequent hand washing and distancing from others who are sick.
- Liberty Apple Valley requires employees who feel sick or have concerns regarding potential exposure to stay at home.

Catastrophic Event Memorandum Account

Liberty Apple Valley will record costs associated with the protections described herein in the CEMA. This includes, but is not limited to, loss of revenues for uncollected bills and expenditures incurred in the response to COVID-19 (e.g., customer notices, supplies and equipment). The costs recorded to the CEMA will be incurred beginning March 4, 2020, which is the start date of the Governor’s emergency proclamation.

No cost information is required for this advice letter filing.

Tier Designation

Pursuant to D.19-07-015, this advice letter is submitted with a Tier 1 designation.

Effective Date

Pursuant to the letter of Executive Director Stebbins, Liberty Apple Valley requests this filing become effective on March 4, 2020.

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 electronically transmitted on March 24, 2020 to competing and adjacent utilities and other utilities or interested parties having requested such notification. During

the COVID-19 pandemic, Liberty Apple Valley can only provide electronic copies of this advice letter to the service list.

Pursuant to Water Industry Rule 3.2 of General Order 96-B, public notice is not required.

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 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 (West Region)
562.923.0711
Edward.Jackson@libertyutilities.com

cc: Service List R.18-03-011

**LIBERTY UTILITIES (APPLE VALLEY RANCHOS WATER) CORP.
ADVICE LETTER 239-W
SERVICE LIST**

Jim Hansen
Navajo Mutual Water Company
P. O. Box 392
Apple Valley, CA 92307
jhansenjr@email.com

Town of Apple Valley
Attention: Frank Robinson
14955 Dale Evans Parkway
Apple Valley, CA 92307
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

Kathleen Rollings-McDonald
Executive Officer
Local Agency Formation Commission
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San Bernardino, CA 92415-0490
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