

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 4, 2017

Edward N. Jackson  
Director of Revenue Requirements  
Liberty Utilities (Park Water) Corp.  
PO Box 7002  
Downey, CA 90241

Dear Mr. Jackson,

The Commission has approved Liberty Utilities (Park Water) Corporation's Advice Letter No. 274-W-A (Supplement to Advice Letter No. 274-W), filed on March 16, 2017 regarding establishing the School Lead Testing Memorandum Account.

Enclosed are copies of the following revised tariff sheets for the utility's files:

<b><u>P.U.C. Sheet No.</u></b>	<b><u>Title of Sheet</u></b>
1336-W	Preliminary Statement, Part BBB
1337-W	Table of Contents, page 1

Please contact Bradley Leong at (415) 703-2307 if you have any questions.

Thank you,

/s/SREEJA MELUVEETIL

Sreeja Meluveetil  
Water & Sewer Advisory Branch  
Division of Water and Audits

Enclosures

**CALIFORNIA PUBLIC UTILITIES COMMISSION  
DIVISION OF WATER AND AUDITS  
Advice Letter Cover Sheet**

**Utility Name:** Liberty Utilities (Park Water) Corp.  
**District:** N/A  
**CPUC Utility #:** U-314-W  
**Advice Letter #:** 274-W-A  
**Tier** ☐ 1 ☒ 2 ☐ 3 ☐ Compliance  
**Authorization** SWRCB DDW

**Date Mailed to Service List:** March 16, 2017  
**Protest Deadline (20<sup>th</sup> Day):** April 5, 2017  
**Review Deadline (30<sup>th</sup> Day):** April 15, 2017  
**Requested Effective Date:** January 17, 2017  
**Rate Impact:** \$0  
0%

**Description:** The purpose of this advice letter is to seek Commission approval to establish the School Lead Testing Memorandum Account ("SLTMA") pursuant to the State Water Resources Control Board ("SWRCB") Division of Drinking Water's ("DDW") issuance of Amendment to the Domestic Water Supply permits issued to Liberty Park Water on January 17, 2017.

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, ext. 1212  
**Email:** [edward.jackson@libertyutilities.com](mailto:edward.jackson@libertyutilities.com)

**Utility Contact:** Ellen M. Zimbalist  
**Phone:** 562.923.0711, ext. 1208  
**Email:** [Ellen.zimbalist@libertyutilities.com](mailto:Ellen.zimbalist@libertyutilities.com)

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

**DWA USE ONLY**

DATE

STAFF

COMMENTS

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

[ ] APPROVED

[ ] WITHDRAWN

[ ] REJECTED

**Signature:** \_\_\_\_\_

**Comments:** \_\_\_\_\_

**Date:** \_\_\_\_\_

\_\_\_\_\_



# Liberty Utilities

Advice Letter No. 274-W-A  
Supplement to Advice Letter 274-W

March 16, 2017

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

Liberty Utilities (Park Water) Corp. (U 314 W) ("Liberty Park Water") hereby transmits the following revised tariff sheets applicable to water service in its service territory:

Calif. P.U.C.		Canceling
<u>Sheet No.</u>	<u>Title of Sheet</u>	<u>Sheet No.</u>
1336-W	Preliminary Statement, Part BB	ORIGINAL
1337-W	Table of Contents, page 1	1335-W

This supplemental filing is being made to incorporate minor changes as discussed with the Water Division. This supplemental filing will replace Advice Letter 274-W in its entirety.

### Summary

The purpose of this advice letter is to seek Commission approval to establish the School Lead Testing Memorandum Account ("SLTMA") pursuant to the State Water Resources Control Board ("SWRCB") Division of Drinking Water's ("DDW") issuance of Amendment to the Domestic Water Supply permits issued to Liberty Park Water on January 17, 2017. The permits establish the requirements for lead monitoring and lead sample result interpretations at any kindergarten through 12<sup>th</sup> grade school within Liberty Park Water's water service territory. Any school seeking lead testing must submit a written request. The SLTMA will track all incremental expenses associated with conducting lead testing at any kindergarten through 12<sup>th</sup> grade school within Liberty Park Water's water service territory that requests this service.

### Background

Recent events in the United States have shown that lead in drinking water remains an ongoing public health challenge and important concern for children's health. The SWRCB is encouraging schools that serve one or more of grades kindergarten through 12<sup>th</sup> grade to test for lead in water from taps regularly used for drinking or cooking. The school can request assistance from their public water system

in California, the SWRCB oversees the public water systems to ensure the water they provide is tested and safe per the requirements of the State and Federal Safe Drinking Water Acts, and regulations adopted pursuant to those Acts, which includes the Lead and Copper Rule ("LCR"), a regulation adopted by the United States Environmental Protection Agency and the SWRCB to control lead and copper in drinking water.

Under the LCR, public water systems are required to test water for lead at a set number of service connections (depending on the number of customers served by the system) that are at a higher risk for lead in the tap water due to their plumbing characteristics. Water suppliers are not required to test every customer's tap.

Liberty Park Water will not use any lead samples collected as part of this school testing permit amendments to satisfy Federal or State Lead and Copper Rule requirements.

Liberty Park Water has a total of 3 water systems and will adhere to the Division of Drinking Water Sampling Guidance for Collecting Drinking Water Samples for Lead Testing at K-12 schools.

**Update to Preliminary Statement**

Liberty Park Water proposes to revise its Preliminary Statement to include the School Lead Testing Memorandum Account ("SLTMA") to track the incremental expenses (not already reflected in authorized rates) for customer outreach, and other incremental operation costs, including but not limited to legal, Operations and Maintenance and Administrative and General expenses that are unforeseen, unexpected and directly associated with complying and implementing the School Lead Testing Program. In accordance with the Commission Standard Practice U-27-W, Liberty Park Water requests to establish this memorandum account to track the aforementioned unanticipated costs. The costs being addressed here are caused by an event of exceptional nature and are not in the existing rates.

Liberty Park Water customers will benefit from the establishment of this memorandum account. Before recovery is granted, the expenses tracked in the memorandum account go through a prudence review by the Office of Ratepayer Advocates and Water Division.

**Tier Designation**

This advice letter is submitted with a Tier 2 designation.

**Effective Date**

Liberty Park Water requests that this filing become effective on January 17, 2017.

**Memorandum Account Treatment**

Liberty Park Water is aware that a memorandum account is not a guarantee of eventual recovery of expenses. Further, it is also known that the Commission policy on memorandum account treatment has always been that the burden of proof of the reasonableness of expenses charged to the account is the responsibility of the utility requesting reimbursement of such expenses.

**Notice and Service**

This advice letter does not seek to increase any rate or charge. Therefore, customer notice is unnecessary. In accordance with General Order 96-B, General Rule 4.3 and 7.2 and Water Industry Rule 4.1, a copy of this advice letter will be mailed or electronically transmitted on January 27, 2017 to competing and adjacent utilities and other utilities or interested parties.

**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 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 us, addressed to:

Edward Jackson  
Director, Rates and Regulatory Affairs  
Liberty Utilities (Park Water) Corp.  
9750 Washburn Road  
P. O. Box 7002  
Downey, CA 90241  
Fax: (562) 861-5902  
E-Mail: [DLCADowneyRegulatoryAffairs@libertyutilities.com](mailto:DLCADowneyRegulatoryAffairs@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 Edward Jackson at (562) 923-0711, ext. 212. Public notice of this filing is not required. Any adjacent public or privately owned utilities and other interested parties have been furnished a copy of this Advice Letter. A list of those recipients is attached

.

Very truly yours,

LIBERTY UTILITIES (PARK WATER) CORP.

/s/ Edward N. Jackson

EDWARD N. JACKSON

Director, Rates and Regulatory Affairs

562.923.0711, ext. 1212

[edward.jackson@libertyutilities.com](mailto:edward.jackson@libertyutilities.com)

LIBERTY UTILITIES (PARK WATER) CORP.  
9750 WASHBURN ROAD  
P. O. BOX 7002  
DOWNEY, CALIFORNIA 90240

ORIGINAL Cal. P.U.C. Sheet No. 1336-W  
Canceling Cal. P.U.C. Sheet No.

**PRELIMINARY STATEMENT**  
(Continued)

**BB. School Lead Testing Memorandum Account**

(N)

Liberty Park Water shall maintain a School Lead Testing Memorandum Account ("SLTMA") to track incremental expenses (not already reflected in authorized rates) associated with conducting lead tests at K-12 grade schools within Liberty Park Water's service territory that request this service.

The SLTMA is being established pursuant to the Amendment to the Domestic Water Supply permits issued by the State Water Resources Control Board's Division of Drinking Water ("DDW") to Liberty Park Water on January 17, 2017.

**1. Purpose**

The purpose of the SLTMA is to track the incremental expenses (not already reflected in authorized rates) for customer outreach, and other incremental operation costs, including but not limited to, legal, Operations and Maintenance and Administrative and General expenses that are unforeseen, unexpected, and directly associated with complying and implementing the School Lead Testing Program.

**2. Applicability**

The SLTMA does not have a rate component.

The SLTMA shall include, but will not be limited to:

- a. Incremental and necessary labor costs associated with planning and coordination with K-12 schools to develop individual sampling plans, collecting and submitting samples to laboratories, and administering program requirements including assisting the school with interpretation of laboratory results and contracted labor;
- b. Laboratory fees for all lead sampling and reporting of the results to DDW and the school, and all laboratory coordination and instruction;
- c. Incremental customer outreach costs that are necessary in coordination with the local school district, local community, and local officials, in compliance with DDW's School Lead Testing Program.

Liberty Park Water shall maintain the SLTMA by making entries at the end of each month as follows:

- a. A debit entry shall be made to the SLTMA at the end of each month to record the expenses discussed above.
- b. Interest shall accrue to the SLTMA on a monthly basis by applying a rate equal to one-twelfth of the 3-month Commercial Paper Rate, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of-month and the end-of-month balances.

**3. Effective Date**

The SLTMA shall go into effect on January 17, 2017.

**4. Disposition**

Disposition of amounts recorded in the SLTMA shall be determined in a subsequent filing, as authorized by the Commission.

(N)

(To be inserted by utility)

Advice No. 274-W-A

GREGORY S. SORENSEN

Dec. No. \_\_\_\_\_

Name  
PRESIDENT

Title

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

Date Filed 03-16-2017

Effective 01-01-2017

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



LIBERTY UTILITIES (PARK WATER) CORP.  
9750 WASHBURN ROAD  
P. O. BOX 7002  
DOWNEY, CALIFORNIA 90240

REVISED Cal. P.U.C. Sheet No. 1337-W  
Canceling REVISED Cal. P.U.C. Sheet No. 1335-W

## 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:

### Subject Matter of Sheet:

### C.P.U.C. Sheet No.

Title Page	1263-W	
Table of Contents	1337-W, 1252-W	(T)
Preliminary Statement	722-W, 1274-W, 1316-W, 1275-W, 1276-W, 1326-W, 1297-W, 1203-W, 1320-W, 1298-W, 1309-W, 1336-W	(T)
Service Area Map Los Angeles County	914-W, 499-W through 502-W	

### Rate Schedules:

Schedule No. PR-1-R	Residential Metered Service	1327-W, 1321-W
Schedule No. PR-1-NR	Nonresidential Metered Service	1328-W, 1322-W
Schedule No. PR-4F	Non-Metered Fire Sprinkler Service	1329-W, 1323-W
Schedule No. PR-5	Fire Flow Testing Charge	1155-W
Schedule No. PR-6	Reclaimed Water Service	1330-W, 1324-W
Schedule No. PR-9CM	Construction & Other Temporary Meter Service	1158-W
Schedule No. 14.1	Water Shortage Contingency Plan	1233-W through 1238-W
Schedule No. LC	Late Payment Charge	848-W
Schedule No. UF	Surcharge to Fund PUC Reimbursement Fee	1334-W
Schedule No. SC	Surcredit	899-W
Schedule No. CARW	California Alternative Rates for Water	1331-W, 921-W
Schedule No. CARW-SC	California Alternative Rates for Water Surcharge	1332-W

### LIST OF CONTRACTS AND DEVIATIONS:

723-W

### Rules:

No. 1	Definitions	636-W, 637-W
No. 2	Description of Service	400-W
No. 3	Application for Service	345-W, 916-W
No. 4	Contracts	346-W
No. 5	Special Information Required on Forms	798-W through 800-W
No. 6	Establishment and Re-establishment of Credit	347-W
No. 7	Deposits	1014-W, 1161-W
No. 8	Notices	1136-W, 802-W
No. 9	Rendering and Payment of Bills	1097-W through 1100-W
No. 10	Disputed Bills	609-W, 610-W
No. 11	Discontinuance and Restoration of Service	803-W through 808-W 1017-W, 1162-W, 1163-W
No. 12	Information Available to Public	353-W, 354-W
No. 13	Temporary Service	355-W, 356-W

(continued)

(To be inserted by utility)	Issued By:	(To be inserted by Cal. P.U.C.)
Advice No. 274-W-A	GREGORY S. SORENSEN	Date Filed 03-16-2017
	Name	
		Effective 01-17-2017
Dec. No.	PRESIDENT	Resolution No.
	Title	

**LIBERTY UTILITIES (PARK WATER) CORP.  
ADVICE LETTER 274-W-A  
SERVICE LIST**

**City of Artesia  
18747 Clarkdale Avenue  
Artesia, CA 90701**

**City of Santa Fe Springs Water Dept.  
11710 Telegraph Road  
Santa Fe Springs, CA 90670**

**Suburban Water Systems  
Attention: Robert Kelly  
1325 N. Grand Avenue, Suite 100  
Covina, CA 91724-4044**

**City of Cerritos Water Department  
18125 Bloomfield Avenue  
Cerritos, CA 90703**

**Bellflower Somerset Mutual Water Co.  
10016 E. Flower St.  
P. O. Box 1697 (90707)  
Bellflower, CA 90706**

**City of Norwalk Water Department  
12700 S. Norwalk Boulevard  
Norwalk, CA 90650**

**City of Compton Water Department  
205 W. Willowbrook  
Compton, CA 90220**

**Golden State Water Company  
Ronald Moore, Regulatory Affairs  
630 E. Foothill Blvd  
San Dimas, CA 91773**

**City of Lynwood Water Department  
Attention: Joseph Kekula  
11330 Bullis Road  
Lynwood, CA 90262**

**City of Paramount Water Department  
16400 Colorado Avenue  
Paramount, CA 90723**

**San Gabriel Water Company  
Attention: Dan Dell'Osa  
P. O. Box 6010  
El Monte, CA 91734**

**City of Bell Gardens  
Attn: Steve Steinbrecher  
7100 Garfield Avenue  
Bell Gardens, CA 90201**

**Dominguez/California Water Service  
2632 W. 237<sup>th</sup> Street  
Torrance, CA 90505-5272**

**Calif. Public Utilities Commission  
Attention Ting-Pong Yuen  
DRA Water  
505 Van Ness Avenue  
San Francisco, CA 94102**

**California Water Service Company  
Attention: Daniel Armendariz  
East Los Angeles District  
2000 S. Tubeway Avenue  
Commerce, CA 90040**

**Central Basin Municipal Water District  
6252 Telegraph Road  
Commerce, CA 90040**

**City of Bellflower  
Attention: Jeff Stewart, City Manager  
16600 Civic Center Drive  
Bellflower, CA 90706**