BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Southern California Edison Company (U338E) for Authority to Increase Rates for its Class C Catalina Water Utility and Recover Costs from Water and Electric Customers.	Application 20-10-018

MOTION OF THE PUBLIC ADVOCATES OFFICE TO ADMIT EXHIBIT CAL ADVOCATES-03 INTO THE EVIDENTIARY RECORD; [PROPOSED] ORDER

I. INTRODUCTION

Pursuant to Rule 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Public Advocates Office of the California Public Utilities Commission (Cal Advocates) hereby submits this Motion for admission of the attached Southern California Edison (SCE) data request response into the evidentiary record in this proceeding. The data request response is found at Appendix A to this Motion, which is incorporated by reference.

Cal Advocates seeks admission of SCE's data request response labeled "PubAdv-SCE-061-SI," dated March 8, 2022. SCE timely responded to Cal Advocates' request sent on March 1, 2022. Cal Advocates proposes that the attached data request response be marked as exhibit CAL ADVOCATES-3.

Cal Advocates previously served the exhibit discussed in this motion via email attachment to the proceeding service list on March 10, 2022. As noted in the email and reflected in the hearing transcript for March 7, 2022, counsel for Cal Advocates indicated during hearings that a data response from SCE was forthcoming.[1] Parties to the

[1] *See* Evidentiary Hearing Transcript, p. 566:5-9.

proceeding indicated no objection to inclusion of proposed exhibit CAL ADVOCATES-3 in the record.

II. PROPOSED EXHIBIT CAL ADVOCATES-03 IS RELEVANT TO THE PROCEEDING SUBJECT MATTER AND ADMISSION OF THE EXHIBIT DOES NOT CAUSE PREJUDICE TO ANY PARTY

Generally, the Commission interprets the rules of evidence broadly, and any evidentiary disputes are decided in favor of allowing all relevant evidence into the record. Technical rules of evidence need not apply in Commission proceedings, provided that the rights of parties to meaningfully participate in the proceeding are preserved.[2] Here, proposed exhibit CAL ADVOCATES-03 further clarifies and explains water audit data in the record.[3]

The questions Cal Advocates posed in the underlying data request could not reasonably have been identified either before or during the cross-examination of SCE witness Ron Hite in the hearing on February 28, 2022.[4] Further, when Cal Advocates set a March 8, 2022 due date for the data request, evidentiary hearings were scheduled to conclude on March 14, 2022, which would have afforded plenty of time to move CAL ADVOCATES-03 into the record with the other exhibits. Hearings instead concluded on March 7, 2022. Opening briefs are due May 13, 2022.[5]

Given that parties to this proceeding have received ample notice of Cal Advocates' intent to seek admission of CAL ADVOCATES-03 into the record, that the exhibit consists entirely of SCE's response to a data request, and that parties previously indicated no opposition to admission of the exhibit, admission of CAL ADVOCATES-03 would not be prejudicial to the rights of any party.

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[2] Public Utilities Code section 1701(a); Commission's Rules of Practice and Procedure, Rule 13.6.

[3] *See* Exhibit SCE-01WP – Policy, pp. 352-361 (consisting of American Water Works Association water audit data).

[4] *See* Evidentiary Hearing Transcript, pp. 339-345.

[5] Amended Commissioner's Scoping Memo and Ruling, April 8, 2022, p. 4.

III. CONCLUSION

For the foregoing reasons, Cal Advocates respectfully requests that the Commission grant this motion and admit proposed exhibit CAL ADVOCATES-03 into the record for this proceeding.

Respectfully submitted,

/s/ EMILY FISHER

Emily Fisher
Attorney for

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Telephone: (415) 703-1327
Email: Emily.Fisher@cpuc.ca.gov

April 18, 2022

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Authority to Increase Rates for its Class C Catalina Water Utility and Recover Costs from Water and Electric Customers.	Application 20-10-018

[PROPOSED] ORDER

In accordance with the Rules of Practice and Procedure, the assigned Administrative Law Judge has considered the Motion of the Public Advocates Office to Admit Exhibit Cal Advocates-03 into the Evidentiary Record. The Administrative Law Judge rules as follows:

> Exhibit CAL ADVOCATES-03 shall be admitted into the record for this proceeding.

Dated _____, 2022

_____
Administrative Law Judge

APPENDIX A

A.20-10-018
Exhibit No. CAL ADVOCATES-03
Witness: S. Ibrahim
Date: March 10 , 2022

PUBLIC ADVOCATES OFFICE EXHIBIT
Response to Data Request Set PubAdv-SCE-061-SI

Southern California Edison
A.20-10-018 – SCE 2022 Catalina Water General Rate Case

DATA REQUEST SET P u b A d v - S C E - 0 6 1 - S I

To: Public Advocates Office
Prepared by: Mary Schickling
Job Title: Business Ops Analysis, Sr. Specialist
Received Date: 3/1/2022

Response Date: 3/8/2022

Question 01.a-b:
Referring to the 2019 American Water Works Association ("AWWA") Water Audit, provided as workbook SCECAT_1910006_WaterAudit_2019 in response to SIH-003 (Water System) Question 04:

a. Please explain how SCE determined the "421.290" value for volume from own sources in cell G15 on the "Reporting Worksheet" worksheet.

i. Please identify all sources and volumes used to determine the value in 1.a.

ii. Please provide all logs and documentation supporting the identified volumes.

b. Please explain how SCE determined the "256.870" value for billed metered in cell G23 on the "Reporting Worksheet" worksheet.

i. Please provide all supporting logs and documentation used to determine the value.

Response to Question 01.a-b:

a. SCE summed the monthly production from each of its sources during 2019 and then adjusted the total to account for the storage differential between the start and end of the year.
   i. Production sources and volumes are included in the attachments provided in response to Question 01.a. ii.
   ii. See attached file: *"1. 191006 – ProdConsLeaks 2019" Correction Tab* cell I19 (for the storage differential).

b. SCE summed the monthly billed consumption amounts during 2019. SCE notes the values between cell G23 on the Reporting Worksheet and the amount shown in the file attached to part 01.b.i are not the same, differing by approximately 0.47 acre-feet (<0.2%). SCE does not currently have an explanation for the differing values.
   i. See attached file: *"2.2019 Sales by Tier."*

WATER PRODUCTION, CONSUMPTION, AND DISTRIBUTION SYSTEM LEAKAGE (DSL)

Water Production, Consumption, and Distribution System Leakage (DSL)								Reporting Year:				2019	
PRODUCTION: Total Water Produced Per Source (Gallons)													
Production Source	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**Jun**	**Jul**	**Aug**	**Sept**	**Oct**	**Nov**	**Dec**	**TOTAL**
Middle Ranch 1A	233	1,213	38	8,191	33	3,892	5,602	8,888	9,336	6,050	83	79	43,638,000
Middle Ranch 5A	466	416	2,072	1	-	801	106	1,536	1,490	732	4,751	3,259	15,630,000
Middle Ranch 6A	1,961	2,152	2,603	5,198	886	1,466	1,763	9	176	212	160	214	16,800,000
Cottonwood 1A	149	-	-	-	307	587	914	835	188	278	541	238	4,037,000
Cottonwood 2	-	-	-	-	-	-	-	-	-	-	-	-	-
Sweetwater 1	133	155	273	223	-	41	-	211	-	-	78	11	1,125,000
Howlands Landing 3	115	269	398	607	622	787	1,159	1,168	930	725	556	279	7,615,000
Whites Landing 1	74	288	454	251	285	200	313	303	290	264	180	116	3,018,000
Toyon Canyon 3	115	133	40	3	-	-	427	412	288	261	245	134	2,058,000
Black Jack 1	15	50	132	85	148	14	37	26	26	81	45	9	66,800
Desal Combined	5,940,000	2,050,000	-	2,250,000	2,100,000	3,680,000	5,050,000	5,540,000	1,200,000	5,440,000	5,200,000	4,920,000	43,370,000
Total Production (Gallons)	9,187,500	6,681,000	5,891,200	16,732,500	4,247,800	11,455,400	15,337,700	18,904,600	13,900,600	13,970,100	11,798,500	9,250,900	137,357,800
Total Production (Acre-Feet)	28.20	20.50	18.08	51.35	13.04	35.16	47.07	58.02	42.66	42.87	36.21	28.39	421.54
AUTHORIZED CONSUMPTION: Billed Metered Water (Gallons)													
Residential	2,449,100	1,973,000	2,436,500	1,929,600	3,277,300	2,871,500	3,435,600	3,801,500	3,174,700	3,050,900	2,183,700	2,855,628	33,439,028
Commercial	2,937,500	2,784,700	3,171,400	3,518,500	4,759,100	4,559,600	4,926,800	6,240,500	4,497,792	3,765,013	3,278,000	3,678,800	48,117,705
Irrigation	86,100	32,100	43,300	34,600	195,100	168,000	194,400	225,100	187,600	337,300	124,700	361,900	1,990,200
Total Metered (Gallons)	5,472,700	4,789,800	5,651,200	5,482,700	8,231,500	7,599,100	8,556,800	10,267,100	7,860,092	7,153,213	5,586,400	6,896,328	83,546,933
Total Metered (Acre-Feet)	16.80	14.70	17.34	16.83	25.26	23.32	26.26	31.51	24.12	21.95	17.14	21.16	256.40
AUTHORIZED CONSUMPTION: Unbilled Metered Water (Gallons)													
Dedicated Fire Service	4,300	3,600	4,400	3,600	4,500	2,400	16,400	4,100	7,100	1,300	8,100	6,000	65,800
Company Use	7,800	8,900	10,000	600	700	8,700	9,200	14,200	4,500	10,300	100	15,000	90,000
Total Metered (Gallons)	12,100	12,500	14,400	4,200	5,200	11,100	25,600	18,300	11,600	11,600	8,200	21,000	155,800
Total Metered (Acre-Feet)	0.04	0.04	0.04	0.01	0.02	0.03	0.08	0.06	0.04	0.04	0.03	0.06	0.48
AUTHORIZED CONSUMPTION: Unmetered Water (Estimates)													
Utility Flushing/Tank Cleaning													-
Fire Fighting/Training (AFD)	500	500	500	500	500	500	500	500	500	500	500	500	6,000
Deluge System Test													-
Unmetered Customers													-
SW / CW 10" Relief Valve		100											100
WG Outage Log	20,000	25,640	27,000	59,000	32,440	87,000	6,000	154,500	143,500	88,500	1,000	69,000	713,580
Total Unmetered	20,500	26,240	27,500	59,500	32,940	87,500	6,500	155,000	144,000	89,000	1,500	69,500	719,680
Total Unauthorized Consumption													2.21
DISTRIBUTION SYSTEM LEAKAGE (DSL):													
Total Volume for DSL	3,682,200	1,852,460	198,100	11,186,100	-4,021,840	3,757,700	6,748,800	8,464,200	5,884,908	6,716,287	6,202,400	2,264,072	
Percent DSL	40%	28%	3%	67%	-95%	33%	44%	45%	42%	48%	53%	24%	28%

Data Sources: Well and Peizometer Reads, SSO Monthly/Annual Reports, Water Distribution Log Book(s)

System Input Volume Corrections (Gallons)							
Facility / Operation	**Capacity (Gals)**	**Gallons Per Foot**	**First Read**	**Last Read**	**Diff. (Feet)**	**Diff. (Gals)**	**Correct To**
Wrigley Reservoir	9000000	Varies	1417.50	1417.10	-0.40	0.00	MR Wells
Baker Tank 4	125000	5181	13.25	14.67	1.42	7357.02	Desal
Baker Tank 5	125000	5181	13.25	14.67	1.42	7357.02	Desal
Baker Tank 6	125000	5181	13.25	14.67	1.42	7357.02	Desal
~~High Pressure Tank~~	~~65000~~	~~4042~~	-	-	-	-	Desal
Mt. Ada Tank	100000	4145	15.33	17.83	2.50	10362.50	Desal
Toyon Tank	100000	4145	17.50	19.92	2.42	10030.90	Toyon Well
Whites Tank	100000	4145	21.50	21.83	0.33	1367.85	Whites Well
Black Jack Tank	100000	4145	16.00	22.42	6.42	26610.90	MR Wells
Airport Tank	65000	4042	13.33	14.58	1.25	5052.50	MR Wells
Million Gallon Tank	1000000	31250	28.33	28.58	0.25	7812.50	CW/SW
Twin Tank 1	100000	4145	22.67	21.33	-1.34	(5554.30)	NA
Twin Tank 2	100000	4145	22.67	21.33	-1.34	(5554.30)	NA
Howlands Tank	110000	6875	10.33	11.33	1.00	6875.00	Howlands
~~SW/CW 10" Relief Valve~~	~~—~~	~~—~~	-	-	~~—~~	-	

Data Sources: Well and Peizometer Reads, SSO Monthly/Annual Reports, Water Distribution Log Book(s)

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Note: If reservoirs gain in storage at the end of the study period the increases should be subtracted from the system input volume. If there is a net reduction in storage, the decreased amount should be added to source supply volume. *Decreases* in storage are *added* to the supply; storage *increases* are *subtracted* from the supply.

	January			
Tier Allocation>>>	**Total**	**ST1**	**ST2**	**ST3**
Res-5/8 in.	1,325,500	970,000	325,600	29,900
Res-3/4 in.	8,700	7,300	1,400	0
Res-1 in.	91,600	54,000	24,800	12,800
Res-1.5 in.	1,600	1,600	0	0
Res-2 in.	38,100	4,700	6,300	27,100
Res-3 in.	0			
Res-4 in.	0			
Res-6 in.	0			
Res-8 in.	0			
Res-Dual-5/8 in.	4,900	4,900	0	0
Res-Dual-3/4 in.	0	0	0	0
Res-Dual-1 in.	72,600	51,000	19,700	1,900
Res-Dual-1.5 in.	78,900	11,400	9,600	57,900
Res-Dual-2 in.	12,600	6,200	6,400	0
Res-Dual-3 in.	0			
Res-Dual-4 in.	0			
Res-Dual-6 in.	0			
Res-Dual-8 in.	0			
Res-CARE-5/8 in.	270,100	187,800	78,400	3,900
Res-CARE-3/4 in.	500	500	0	0
Res-CARE-1 in.	5,300	3,700	1,600	0
Res-CARE-1.5 in.	0			
Res-CARE-2 in.	0			
Res-CARE-3 in.	0			
Res-CARE-4 in.	0			
Res-CARE-6 in.	0			
Res-CARE-8 in.	0			
Res-CARE-Dual-5/8 in.	0			
Res-CARE-Dual-3/4 in.	0			
Res-CARE-Dual-1 in.	500	500	0	0
Res-CARE-Dual-1.5 in.	0			
Res-CARE-Dual-2 in.	0			

Res-CARE-Dual-3 in.	0			
Res-CARE-Dual-4 in.	0			
Res-CARE-Dual-6 in.	0			
Res-CARE-Dual-8 in.	0			
Res-DE-5/8 in.	113,100	65,900	42,500	4,700
Res-DE-3/4 in.	0	0	0	0
Res-DE-1 in.	2,700	2,000	700	0
Res-DE-1.5 in.	0	0	0	0
Res-DE-2 in.	0	0	0	0
Res-DE-3 in.	0	0	0	0
Res-DE-4 in.	0	0	0	0
Res-DE-6 in.	0	0	0	0
Res-DE-8 in.	0	0	0	0
Res-DE-Dual-5/8 in.	0	0	0	0
Res-DE-Dual-3/4 in.	0	0	0	0
Res-DE-Dual-1 in.	0	0	0	0
Res-DE-Dual-1.5 in.	1,500	1,500	0	0
Res-DE-Dual-2 in.	0			
Res-DE-Dual-3 in.	0			
Res-DE-Dual-4 in.	0			
Res-DE-Dual-6 in.	0			
Res-DE-Dual-8 in.	0			
Res-MM-5/8 in.	125,700	49,800	55,500	20,400
Res-MM-3/4 in.	0			
Res-MM-1 in.	82,000	14,200	22,500	45,300
Res-MM-1.5 in.	51,300	12,000	20,300	19,000
Res-MM-2 in.	145,600	10,000	22,100	113,500
Res-MM-3 in.	0			
Res-MM-4 in.	0			
Res-MM-6 in.	0			
Res-MM-8 in.	0			
Res-MM-Dual-5/8 in.	0			
Res-MM-Dual-3/4 in.	0			
Res-MM-Dual-1 in.	0			

Res-MM-Dual-1.5 in.	0			
Res-MM-Dual-2 in.	0			
Res-MM-Dual-3 in.	0			
Res-MM-Dual-4 in.	0			
Res-MM-Dual-6 in.	0			
Res-MM-Dual-8 in.	0			
Com-5/8 in.	492,500	140,500	134,100	217,900
Com-3/4 in.	300	300	0	0
Com-1 in.	620,800	82,600	122,600	415,600
Com-1.5 in.	464,300	55,800	86,600	321,900
Com-2 in.	1,343,700	85,200	145,000	1,113,500
Com-3 in.	15,900	2,000	4,500	9,400
Com-4 in.	0			
Com-6 in.	0	0	0	0
Com-8 in.	0	0	0	0
Com-CARE-5/8 in.	0			
Com-CARE-3/4 in.	0			
Com-CARE-1 in.	0			
Com-CARE-1.5 in.	0			
Com-CARE-2 in.	0			
Com-CARE-3 in.	0			
Com-CARE-4 in.	0			
Com-CARE-6 in.	0			
Com-CARE-8 in.	0			
IRRI-5/8 in.	38,900	14,300	7,800	16,800
IRRI-3/4 in.	0	0	0	0
IRRI-1 in.	21,200	6,400	8,900	5,900
IRRI-1.5 in.	14,600	6,300	6,200	2,100
IRRI-2 in.	11,400	4,000	5,000	2,400
IRRI-3 in.	0	0	0	0
IRRI-4 in.	0			
IRRI-6 in.	0			
IRRI-8 in.	0			
FIRE-5/8 in.	500	500	0	0

FIRE-3/4 in.	100	100	0	0
FIRE-1 in.	0	0	0	0
FIRE-1.5 in.	0	0	0	0
FIRE-2 in.	0	0	0	0
FIRE-3 in.	0	0	0	0
FIRE-4 in.	3,700	2,200	1,500	0
FIRE-6 in.	0	0	0	0
FIRE-8 in.	0	0	0	0
SCW-5/8 in.	400	400	0	0
SCW-3/4 in.	0	0	0	0
SCW-1 in.	0			
SCW-1.5 in.	0			
SCW-2 in.	7,400	2,000	4,500	900
TOTAL	**5,468,500**	**1,861,600**	**1,164,100**	**2,442,800**