

Docket: : A.15-07-001  
Exhibit Number : ORA - \_\_\_\_  
Commissioner : Catherine J.K. Sandoval  
Administrative Law Judge : Gerald F. Kelly  
ORA Witnesses : Michael Conklin  
Lisa Bilir  
Alex Lau  
Pat Ma  
Wenli Wei  
Sung Han



**OFFICE OF RATEPAYER ADVOCATES  
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**Report on  
The Results of Operations  
Great Oaks Water Company  
Fiscal Test Year 2016/2017 General Rate Case  
A.15-07-001**

**APPENDIX G and APPENDIX H (Part 1)  
PUBLIC**

**San Francisco, California  
October 19, 2015**

1

**APPENDIX G (ORA Testimony Section Regarding City of San Jose**

2

**Litigation Memorandum Account)**

3

1 **City of San Jose Litigation Memorandum Account (Preliminary Statement I)**

2 The City of San Jose Litigation Memorandum Account, approved in Decision 10-11-034 and  
3 established via Advice Letter 199-W on December 3, 2010,<sup>1</sup> was established to record  
4 outside legal expenses related to GOWC’s litigation with the City of San Jose over its  
5 service territory.<sup>2</sup> GOWC requests to continue this memorandum account and states that the  
6 reasons for establishing the account have not changed.<sup>3</sup>

7 The Commission stated its reasons for establishing the account as follows:

8 In this proceeding, (1) there is considerable uncertainty regarding  
9 the level of projected litigation expenses, especially as the  
10 pending case has been dismissed and no settlement discussions  
11 have been scheduled, and (2) Great Oaks asserts that a settlement  
12 may provide ratepayer benefits but cannot detail them and  
13 affirms that a final resolution of the dispute will need to be  
14 brought before the Commission for its review and approval.  
15 Therefore, we find that Great Oaks should be authorized to file  
16 by a Tier 2 Advice Letter to establish a memorandum account for  
17 outside legal expenses related to this litigation, with a cap of  
18 \$225,000 for expenses over the coming GRC period. As with its  
19 SCVWD memorandum account, Great Oaks must record in the  
20 memorandum account on a monthly basis any expenses that may  
21 be eligible for recovery and be subject to ratemaking review  
22 when it seeks recovery. Great Oaks should bear the burden when  
23 it requests recovery of the recorded costs, to show that separate  
24 recovery of the types of costs recorded in the account is  
25 appropriate, that it acted prudently when it incurred these costs,  
26 and that the level of costs is reasonable. Great Oaks may seek  
27 recovery of the costs in this memorandum account in its next  
28 GRC or through a Tier 3 Advice Letter filing.<sup>4</sup>

29 GOWC states however that no litigation is currently pending between GOWC and the City  
30 of San Jose because of an agreement between the two entities.<sup>5</sup> \*\*\* BEGIN

31 CONFIDENTIAL \*\*\* [REDACTED]

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<sup>1</sup> A.15-07-001, Exhibit I, p. 3.

<sup>2</sup> GOWC Preliminary Statement I.1.

<sup>3</sup> A.15-07-001, p. 9.

<sup>4</sup> Decision 10-11-034 pp. 45-46, emphasis added.

<sup>5</sup> A.15-07-001, Exhibit I, p. 3.

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED] \*\*\* END

12 CONFIDENTIAL\*\*\* Even though GOWC asserts that it is prepared to re-initiate litigation  
13 over this service area/service duplication dispute if needed,<sup>7</sup> this is not sufficient reason to  
14 keep the memorandum account open.

15 The information available has changed since D.10-11-034. Although the date of the  
16 Agreement was April 15, 2008, the information in the Agreement must not have been  
17 available to the Commission when it wrote D.10-11-034. D.10-11-034 states that the status  
18 of the litigation was “the case has been dismissed subject to an agreement to refile if a  
19 settlement cannot be reached. Great Oaks anticipates having discussions with the city later  
20 this year, but nothing has been scheduled. If a settlement is reached, Great Oaks anticipates  
21 it will require Commission approval.”<sup>8</sup> \*\*\* BEGIN CONFIDENTIAL \*\*\* [REDACTED]

22 [REDACTED]  
23 [REDACTED] \*\*\* END

24 CONFIDENTIAL \*\*\*

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<sup>6</sup> BEGIN CONFIDENTIAL \*\*\* [REDACTED] \*\*\* END CONFIDENTIAL

<sup>7</sup> A.15-07-001, Exhibit I, p. 3.

<sup>8</sup> D.10-11-034, p. 38, footnote 60.

<sup>9</sup> BEGIN CONFIDENTIAL \*\*\* [REDACTED] \*\*\* END CONFIDENTIAL

1 GOWC states that the City of San Jose has engaged in activities that may give rise to  
2 additional service duplication claims and that although discussions with the city are expected  
3 to continue, litigation to resolve the claims appear more likely now than at any time in recent  
4 years.<sup>10</sup> Although GOWC objected to providing the details of the activities referenced in the  
5 above statement, GOWC stated that the activities are of the character that gives rise to  
6 liability under CPUC Code Sections 1501-1507<sup>11</sup> and that these service duplication claims  
7 are different than those discussed in D.10-11-034.<sup>12</sup> Because these activities are different  
8 than those discussed in D.10-11-034, the costs of litigation associated with those activities  
9 are not the costs the Commission authorized to be tracked in the memorandum account  
10 considered in D.10-11-034. The Commission should authorize GOWC to amortize the  
11 (\$877.13) in the City of San Jose Litigation Memorandum Account and order GOWC to  
12 close the account.

13

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<sup>10</sup> A.15-07-001, Exhibit I, p. 4.

<sup>11</sup> GOWC Response to ORA Data Request LWA-002, question 7.a.

<sup>12</sup> GOWC Response to ORA Data Request LWA-002, question 7.b.

1                    **APPENDIX H (GOWC Responses to ORA’s Data Requests) Part 1**

2    Appendix H contains GOWC’s Responses and Supplemental Responses to ORA’s Data  
3    Requests as well as select attachments as listed below:

4	Response to AL7-001 (System Demand)	(p. 1)
5	Response to AL7-002 (System Supply and Wells)	(p. 4)
6	Response to AL7-003 (CWIP)	(p. 11)
7	Response to AL7-004 (Reports)	(p. 13)
8	Supplemental Response to AL7-004 (Reports)	(p. 16)
9	Response to AL7-005 (System Demand 2)	(p.18)
10	Response to AL7-006 (System Supply and Requests)	(p. 20)
11	Response to AL7-007 (Vehicles)	(p. 26)
12	Response to AL7-008 (Contingency & Project Estimates)	(p. 30)
13	Response to AL7-009 (Authorized Proj & AL)	(p. 38)
14	Response to AL7-010 (Water Quality)	(p. 42)
15	Response to AL7-011 (Vehicles 2)	(p. 49)
16	Response to AL7-012 (Coyote Valley Tank)	(p. 52)
17	Response to AL7-013 (Coyote Valley Wells Requests)	(p. 56)
18	Response to AL7-014 (CWIP 2)	(p. 60)
19	Response to AL7-015 (Pressure Zones)	(p. 63)
20	Response to AL7-016 (Wells)	(p. 65)
21	Response to LWA-001 (BAMA Follow up to DR MC8-006)	(p. 68)
22	Response to LWA-002 (BAMA)	(p. 78)
23	Response to LWA-003 (LICAP)	(p. 83)
24	Response to MC8-001 (BAMA)	(p. 87)
25	Supplemental Response to MC8-001 (BAMA)	(p. 90)
26	Partial Response to MC8-002 (SDR)	(p. 92)
27	Supplemental Response to MC8-002 (SDR)	(p. 95)
28	Response to MC8-003 (Payroll)	(p. 98)
29	Response to MC8-004 (Sales)	(p. 102)
30	Response to MC8-005 (Cust Serv)	(p. 105)
31	Supplemental Response to MC8-005 (Cust Serv)	(p. 109)
32	Response to MC8-006 (BAMA)	(p. 111)

1	Response to MC8-007 (Payroll follow up)	(p. 122)
2	Response to MC8-008 (Sales follow up)	(p. 126)
3	Response to MC8-009 (Cust Serv)	(p. 130)
4	Response to MC8-010 (ATR reorg audit)	(p. 134)
5	Response to SBH-001 (Tangible Property Regulation)	(p. 136)
6	Response to SBH-002 (Deferred Income Taxes)	(p. 138)
7	Response to SBH-003 (Income Taxes)	(p. 140)
8	Response to SBH-004 (Deferred Income Taxes)	(p. 142)
9	Response to SBH-005 (Taxes Other)	(p. 144)
10	Response to SBH-006 (Tax Depreciation)	(p. 147)



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

July 27, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-001**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-001.

This response is being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

General Objection: This data request is not in compliance with Commission Rule 10.1 in that it seeks information that is not relevant to any issue in Great Oaks' pending application A.15-07-001, nor is it reasonably calculated to lead to the discovery of admissible evidence on any issue raised in A.15-07-001. Great Oaks respectfully requests that if ORA believes the information requested in this data request is relevant to any issue under A.15-07-001 that ORA identify the issue and explain the relevance.

Without waiving this objection, Great Oaks responds to ORA Data Request AL7-001 as follows:

1. For each water zone/area please provide actual/recorded information in Excel format for the most recent ten years (2005 through 2014):

<b>Year</b>	<b>Area/ Zone</b>	<b>ADD (gpm)</b>	<b>MDD (gpm)</b>	<b>PHD (gpm)</b>	<b>Average Operating Pressure (psi)</b>	<b>Recorded Pressure Range, min-max (psi)</b>	<b>Number of Active Connections (EOY)</b>	<b>Average Number of Active Customers (people)</b>

Response: See attached spreadsheet labeled GOWC Response to ORA Data Request AL7-001 (1).

2. State GOWC’s fire flow requirements within the system by zone/area.

Response: See documents attached and labeled GOWC Response to ORA Data Request AL7-001 (2).

- a. Provide evidence to support the stated requirement(s) for each zone/area (e.g. letter from local jurisdiction, references to applicable codes).

Response: Objection. Great Oaks does not establish the fire flow requirements for either the City of San José or the County of Santa Clara and is therefore not the proper party to provide evidence to support the fire flow requirements established by those respective government agencies. Without waiving this objection, please see the response to data request 2, above.

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: July 27, 2015

\_\_\_\_\_/s/  
 Timothy S. Guster  
 Vice President and General Counsel  
 Legal and Regulatory Affairs  
 Great Oaks Water Company  
 PO Box 23490  
 San Jose, CA 95153  
 Telephone: (408) 227-9540  
 Facsimile: (408) 227-7126  
 Email: tguster@greatoakswater.com

#### VERIFICATION

I, Jared Ajlouny, am an employee of, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-001 and know the contents thereof. I certify that the Responses to Data Request AL7-001 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on July 27, 2015.

\_\_\_\_\_/s/  
 Jared Ajlouny



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 7, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
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Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-002**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-002.

This response is being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. Provide a system schematic drawing of Great Oaks' ("GOWC") water system that includes the following information:
  - a. Zone name and hydraulic grade line level.
  - b. Well name and actual capacity in gpm.
  - c. Tanks: facility name and capacity in MG.

- d. Boosters: facility name and capacity in gpm.
- e. Control Valves in the system.
- f. Pressure Relief Valves in the system.
- g. All interconnections and capacity in gpm.
- h. All treatment facilities and type.
- i. All filter facilities and type.

See sample system schematic drawing attached.

Response: Great Oaks provided ORA with the information required to adequately respond to this data request during its August 4, 2015 site visit.

- 2. In PDF format, on a water system map (e.g. GIS printout) provide the locations of all existing facilities and all capital projects proposed in this GRC.

Response: Great Oaks provided this information (data disk – 2 copies) during ORA’s site visit to Great Oaks on August 4, 2015.

- 3. For wells 22, 23, and 24 provide the following information in Excel spreadsheet format:
  - a. Name of well.
  - b. Zone/system where well is located.
  - c. Sub-Basin well is drawing from.
  - d. Well status (active, inactive, backup).
  - e. Date of inactive/backup status if applicable.
  - f. Actual capacity in gpm.
  - g. Year installed.
  - h. Total well depth (ft).
  - i. Most recent static water level (ft) and date recorded.
  - j. Inlet/pump depth (ft).
  - k. Recorded lowest water level (ft) and date recorded.
  - l. Total yearly production for 2010, 2011, 2012, 2013 and 2014.
  - m. Known contaminants/issues.
  - n. Additional comments.

Response: See information provided on attached document entitled GOWC Response to ORA Data Request AL7-002 (3).

- 4. In GOWC workpaper Exhibit G, Capital Projects and Justifications (“Exhibit G”), p. 1, GOWC states it has communicated its concern with the Santa Clara Valley Water District’s (“SCVWD”) recent practice of diverting water historically used for recharging the groundwater basin.
  - a. In PDF format, provide copies of the letter(s) sent to SCVWD regarding this recent practice of diverting water historically used for recharging the groundwater basis and SCVWD’s response(s) to GOWC.

Response: See document attached as GOWC Response to ORA Data Request AL7-002 (4.a.).

- b. What is SCVWD's current purchased water rate?

Response: Contract Treated Water: \$994.00 per acre foot; Non-Contract Treated Water: \$1,094.00 per acre foot.

- c. Has GOWC considered purchasing water from SCVWD instead of drilling for new wells? Please explain why or why not.

Response: Objection. This data request is not limited to any particular time frame and is therefore not reasonably designed to lead to the discovery of relevant evidence. Without waiving this objection, Great Oaks will respond and limit its response to the Test Year and Escalation Years at issue in this proceeding.

Great Oaks has not considered purchasing water from SCVWD for the Test Year and Escalation Years at issue in this proceeding because of pending legal proceedings in which both the SCVWD groundwater charge and the SCVWD treated water charges are at issue. The current groundwater charge of \$894 per acre-foot in Zone W-2 includes an illegal subsidy of at least \$199.40 per acre foot and the current groundwater charge in Zone W-2 of \$356 includes an illegal subsidy of at least \$9.00 per acre foot. Without the illegal subsidies being challenged by Great Oaks, the groundwater charge in Zones W-2 and W-5 would be at most \$694 per acre-foot and \$347 per acre-foot, respectively. The actual cost of treated water would be more than \$1,350 per acre-foot without the illegal subsidies. Great Oaks also does not have a connection between its system and that of SCVWD. Without that connection, no water may be purchased from SCVWD. Establishing that connection would require significant additional expense. Finally, purchasing treated water from SCVWD would further deplete water supplies required for adequate and necessary groundwater recharge.

- d. Has GOWC performed a cost benefit analysis on purchasing water from SCVWD instead of drilling for new wells? If so, please provide ORA a copy of this analysis. If not, please provide this analysis including the cost to construct wells.

Response: See response to data request 4.d., above.

5. Has GOWC considered changing out the existing casing at wells 22, 23, and 24 so that the casing perforations will be lower than the existing water table/static water level?

Response: No.

6. Please explain GOWC's response to question 5 above, and provide cost estimates to change out existing casings.

Response: The casings cannot be removed. Approximately 100 feet of 30-inch diameter concrete is holding each casing in the ground. The wells would be destroyed by any attempt to remove the casings.

7. Does GOWC expect SCVWD's inaction to meaningfully recharge the sub-basins to result in continual lowering of water levels in the future? Explain why or why not.

Response: Yes. SCVWD's decision not to recharge the groundwater in the area, combined with continued groundwater pumping, will result in continued lowering of the water table absent unusually and unexpectedly high natural recharge (i.e., more rainfall than SCVWD can capture and store in its reservoirs).

8. What are the projected well depths of proposed wells 23A, 24A and 25?

Response: 250 feet.

9. What guarantees the projected well depths of the proposed wells to remain sufficient in the future if water levels in the sub-basins continue to drop?

Response: None.

10. Detail any alternatives to drilling new wells that GOWC has considered.

Response: Acquisition of existing wells in Coyote Valley as part of resolution of long-standing dispute with City of San José; purchase of water from existing well owners in Great Oaks' service area; future water purchases from well owners in Great Oaks' service area (wells not in existence at this time); purchase water from San Jose Water Company on as-needed, emergency basis; establish capability to recharge groundwater with recycled water (alone or in partnership with another entity); litigation to require SCVWD to fulfill its legal obligations on groundwater management and groundwater recharge.

11. What have been the response(s) of property owners adjacent to wells 23 and 24 to GOWC's inquiries to acquire their property?

- a. In PDF format, provide copies of any communication with these property owners.

Response: The adjacent property owners have indicated a willingness to sell the properties needed for the wells. Discussions have been preliminary and verbal with the property owner from whom Great Oaks would purchase the land for the proposed Well 23A. Both verbal and email discussions have taken place with respect to the proposed land acquisition for Well 24A. The email discussions are included in the documents attached as GOWC Response to ORA Data Request AL7-002 (11.a.). No final agreement has been made for the land acquisition.

12. Refer to GOWC workpaper Exhibit E, tab WP-16 Plant in Service Additions, cell G18 containing the hard-coded formula  
“(318000+46000)+(298000+38000)+(602500+76000)”:
- a. Explain how the values found in the formula reconciles with the estimated project cost of \$484,000, \$396,000 and \$798,500 for wells 23A, 24A, and 25 seen in GOWC workpaper Exhibit G, pp. 2 and 3.

Response: For Well 23A, the following costs are included in Exhibit E, GRC Workpapers, page WP-16, Cell G18: Direct Costs of \$318,000 (Engineering - \$10,000; Drilling - \$200,000; Pump, Motor, Discharge Piping, Fence - \$96,000; DWSAP/CEQA Compliance Costs - \$12,000) plus the Contingency of \$46,000 – for a total of \$364,000. Land (\$120,000) is part of the formula in Exhibit E, GRC Workpapers, page WP-16, Cell G14 (the other values in the G14 formula are the projected land costs for Wells 24A and 25). Total costs for Well 23A continue to be \$484,000 as shown on Exhibit G.

For Well 24A, the following costs are included in Exhibit E, GRC Workpapers, page WP-16, Cell G18: Direct Costs of \$298,000 (Engineering - \$10,000; Drilling - \$180,000; Pump, Motor, Discharge Piping, Fence - \$96,000; DWSAP/CEQA Compliance Costs - \$12,000) plus the Contingency of \$38,000 – for a total of \$336,000. Land for Well 24A is included in Cell G14, as indicated above, in the amount of \$60,000. Total costs for Well 24A continue to be \$396,000, as shown on Exhibit G.

For Well 25, the following costs are included in Exhibit E, GRC Workpapers, page WP-16, Cell G18: Direct Costs of \$602,500 (Engineering - \$18,000; Drilling - \$180,000; Pump, Motor, Discharge Piping, Fence - \$78,000; Electric Service and Panel - \$85,000; Fence and Site Construction - \$26,000; SCADA Controls and Communication - \$7,500; DWSAP/CEQA Compliance Costs - \$12,000; Main Extension on Richmond Road - \$190,000; Permits - \$6,000) plus the Contingency of \$76,000 – for a total of \$678,500. Land for Well 25 is included in Cell G14, as indicated above, in the amount of \$120,000. Total costs for Well 25 continue to be \$798,500, as shown on Exhibit G.

13. Refer to GOWC workpaper Exhibit G, Capital Projects and Justifications:
- a. Explain how GOWC arrived at its cost estimates for Wells 23A, 24A, and 25?

Response: Property acquisition cost is based upon an estimate of value of land to be purchased as well as the attitude and position of the current landowner. Drilling costs are estimated based upon estimates from two well drilling companies (Chappel Pump and Maggiora Drilling). An additional cost (\$20,000) of piping discharge water while drilling was included for Well 23. Pump, Motor, Fence and Discharge Piping is estimated based upon Great Oaks' knowledge of costs of similar equipment. Engineering costs are estimated based upon previous experience with engineering costs of similar projects. DWSAP and CEQA costs were estimated by an environmental consultant that we have used several times in the past (David Friedland). Contingency is simply 10% of cost total.

Electric Service and Panel is based upon costs of similar items in the past. Main Extension cost was based upon the estimated cost per foot of installing 16" pipeline off of the asphalt. Permit cost is based upon recent experience of laying pipelines within County roadways. SCADA Controls and Construction costs are based upon Great Oaks' experience with installing similar equipment at other well sites.

- b. Provide any supporting evidence for the explanation given in response to question 13.a above. (e.g. contractor bids and/or invoices of recently completed projects)

Response: See document attached and labeled GOWC Response to ORA Data Request AL7-002 (13.b.). Document is a preliminary quote for DSWAP and CEQA compliance.

- c. In the same format as the cost breakdown for Well 25 seen on page 3, provide the actual costs recorded for the most recent well drilled in GOWC's system.

Response: See document attached and labeled GOWC Response to ORA Data Request AL7-002 (13.c.). This information was provided by Great Oaks in partial support of its Advice Letter 191-W and its supplement AL 191-W-A. Note that the costs for Well 24 were approved by the Commission in Resolution W-4724.

- d. Provide any supporting documents for the actual costs recorded and detailed in response to question 13.c above. (e.g. contractor bids and invoices)

Response: See response to data request 13.c., above. Invoices and other documents have been archived. These expenses are not the subject of any issue in the pending proceeding and are at least seven (7) years old as of the time of this response.

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: August 7, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
 Timothy S. Guster  
 Vice President and General Counsel  
 Legal and Regulatory Affairs  
 Great Oaks Water Company  
 PO Box 23490  
 San Jose, CA 95153  
 Telephone: (408) 227-9540  
 Facsimile: (408) 227-7126  
 Email: tguster@greatoakswater.com

**VERIFICATION**

I, John Roeder, am Chief Executive Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-002, numbers 1 through 11 and 13, and know the contents thereof. I certify that the Responses to Data Request AL7-002 1 through 11 and 13 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 7, 2015.

\_\_\_\_\_  
/S/

John Roeder

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Response to ORA Data Request AL7-002, number 12, and know the contents thereof. I certify that the Response to Data Request AL7-002, number 12, is true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 7, 2015.

\_\_\_\_\_  
/S/

Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 11, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
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Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-003**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-003 pursuant to the instructions in the originating email containing the Data Request.

Responses to Data Requests

1. As of 6/30/2015, for all projects with a balance recorded in GOWC’s Construction Work In Progress (“CWIP”) Account and for all outstanding Advice Letter (“AL”) projects, provide the follow information in Excel spreadsheet format:
  - a. Project ID/work order number.
  - b. Project name/description (and indicate if this is an AL project).
  - c. Did GOWC fund the project? If not, indicate the funding party.
  - d. Recorded CWIP balance as of 6/30/2015.
  - e. Authorized dollar amount for project expenditure.
  - f. Commission Decision or AL the project was authorized in.

- g. Original planned/authorized completion date.
- h. Current project status (land acquisition, permitting, design, construction, on hold, cancelled, etc.)
- i. Current estimated project completion date.
- j. Current estimated total dollar amount expenditure at project completion.

Response: See spreadsheet attached and labeled GOWC Res AL7-003 (1).

2. For Question 1.c above, if a project is not funded by GOWC, identify where in GOWC's workpapers an offsetting entry has been made for Rate Base calculations.

Response: See Exhibit E, GRC Workpapers, pages WP-23 (Contributions in Aid of Construction) and WP-28 (Average Weighted Depreciated Rate Base).

### VERIFICATION

I, Ron Ceolla, am Chief Financial Officer of, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-003 and know the contents thereof. I certify that the Responses to Data Request AL7-003 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 11, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 13, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-004**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-004 pursuant to the instructions in the originating email containing the Data Request.

Responses to Data Requests

1. Please provide the most recent well inspection reports for Wells 22, 23, and 24.

Response: See Exhibit D, Report on Results of Operations, Exhibit 3-8, California Department of Public Health Inspections and Corrective Action Plans.

2. Provide the “Well Log: Lithology and Construction” diagrams for Wells 22, 23, and 24.

Response: See documents attached and labeled GOWC Response to ORA Data Request AL7-004 (2).

3. In PDF format, provide GOWC's latest Emergency Disinfection Plan submitted to DDW.

Response: See document attached and labeled GOWC Response to ORA Data Request AL7-004(3).

4. In PDF format, provide GOWC's latest Emergency Response Plan.

Response: See document attached and labeled GOWC Response to ORA Data Request AL7-004(4). Document produced does not include the lengthy Appendix.

5. Provide the leak records for the Country View Drive Main Extension project specifically and list the date and address of each of the leaks.

Response: Leaks for Country View Drive:

Leak Date	Leak Address
12/19/2001	22617 Country View Drive
6/1/2007	22599 Country View Drive
8/20/2007	22629 Country View Drive
7/20/2008	22629 Country View Drive
8/10/2009	22575 Country View Drive
1/2/2011	Calero Check Valve Site
6/11/2012	22581 Country View Drive
7/13/2013	22593 Country View Drive

6. Please provide GOWC's tank inspection and cleaning records from 2010 to present and GOWC's tank inspection and cleaning schedule from present to 2020.

Response:

Tank	Date	Action
Ashmont 1 Million	4/2013	Drain/clean/inspect
	11/2013	Drain/sandblast/recoat
Ashmont .5 Million	9/2010	Drain/clean/inspect/spot repair
Calero	10/2010	Drain/clean
Levin (both)	3/2014	Clean (vacuum)/inspect

Tank Inspection and Cleaning Schedule: 6-year inspection and cleaning schedule.

Ashmont 1 Million – 11/2019

Ashmont .5 Million – 9/2016

Calero – 10/2016

Levin (both) – 3/2020

**VERIFICATION**

I, Jared Ajlouny, am an employee of, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-004 and know the contents thereof. I certify that the Responses to Data Request AL7-004, numbers 2, 5, and 6, are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 13, 2015.

\_\_\_\_\_  
/s/  
Jared Ajlouny

**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-004 and know the contents thereof. I certify that the Responses to Data Request AL7-004, numbers 1, 3, and 4, are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 13, 2015.

\_\_\_\_\_  
/s/  
Timothy S. Guster



**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of the Applicant in this proceeding. I have read Great Oaks Water Company's Supplemental Response to ORA Data Request AL7-004(3) and know the contents thereof. I certify that the Supplemental Response to Data Request AL7-004(3) is true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 28, 2015.

\_\_\_\_\_  
/s/  
Timothy S. Guster



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 14, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-005**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-004 pursuant to the instructions in the originating email containing the Data Request.

Responses to Data Requests

1. Please provide the MDD and PHD of the system for the past 10 years (2005-2014) pursuant to the California Code of Regulations Section 64554. If the recorded MDD is not available, provide the maximum month demand for the year and specify the month that it occurred in. If the maximum month demand is not available, please provide any set of data that will allow ORA to calculate the MDD and PHD of the system.

Response: During the 10-year period from 2005 to 2014, the maximum month demand occurred in July of 2005, when Great Oaks produced 1,712.26 acre-feet of water. For that

month, MDD was calculated as 82.85 acre-feet/day, and PHD was calculated as 28,135 gpm.

2. Provide GOWC's best estimate of the Maximum Day Demand for the past 10 years in gpm for the Coyote Valley Area southeast of the proposed Santa Teresa Pump Station. Please describe how GOWC produced this estimate and provide the recorded data used, such as metered records of connections in that area.

Response: Great Oaks estimates MDD for this area during the specified period of time as 5.890 acre-feet/day. Great Oaks produced this estimate using records of usage by account by month in the area, determining that May of 2008 experienced the highest demand during this period, and using a peaking factor of 1.5.

### VERIFICATION

I, John Roeder, am Chief Executive Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-005 and know the contents thereof. I certify that the Responses to Data Request AL7-005 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 14, 2015.

\_\_\_\_\_  
/s/  
John Roeder



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 19, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-006**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-006 pursuant to the instructions in the originating email containing the Data Request.

Responses to Data Requests

1. For all wells provide the following information in Excel spreadsheet format:
  - a. Name of well.
  - b. Zone/system where well is located.
  - c. Sub-Basin well is drawing from.
  - d. Well status (active, inactive, backup).
  - e. Date of inactive/backup status if applicable.
  - f. Actual capacity in gpm.

- g. Year installed.
- h. Total well depth (ft).
- i. Most recent pumping water level (ft) and date recorded.
- j. Top of casing perforation depth (ft).
- k. Inlet/pump depth (ft).
- l. Recorded lowest water level (ft) and date recorded.
- m. Known contaminants/issues.
- n. Additional comments.

Response: See spreadsheet attached and labeled GOWC Response to ORA Data Request AL7-006(1).

2. Identify all GOWC storage tanks and for each tank provide the storage capacity (MG), supply capacity at its connection to the water system (gpm), and the address.

Response:

Tank	Capacity (MG)	Supply Capacity (gpm)	Address
Ashmont 1	0.5	Supply capacity and flow rate depend upon system pressure	4811 Ashmont Drive
Ashmont 2	1.0		4811 Ashmont Drive
Lower Levin	3.0		Piercy Ranch Road
Upper Levin	1.5		Piercy Ranch Road
Calero	0.22		Calero Peak

3. Identify all GOWC interconnection(s) with neighboring water supplies and for each connection provide to whom it is connected to, the designed flow capacity, and the location.

Response: Great Oaks has three (3) existing interconnections with San Jose Water Company (SJWC): (1) Snell Road and Tradewinds Drive – 12-inch connection; (2) Snell Road and Chynoweth Avenue – 12-inch connection; (3) Snell Road and Suisse Drive – 8-inch connection. Great Oaks has one additional 6-inch connection with Santa Teresa Meadows Water Company (STMWC), although it is not considered useful to supply water to Great Oaks, as STMWC has only one small well, a ground-level 30,000 gallon water storage tank, and approximately 25 customers.

4. Provide all GOWC existing interconnection operating agreements with neighboring water supplies. If there are no existing operating agreements, please explain under what situation can each interconnection be used.

Response: No written agreements. Great Oaks and SJWC have agreed to notify each other in the event an interconnection is used. The interconnections are metered. SJWC’s typical pressure is higher than that of Great Oaks.

5. Identify all booster station(s) and for each booster provide the capacity, a general description of the station’s functions, and the address.

Response: Great Oaks has four (4) booster stations: (1) Ashmont Tank location – five booster pumps (4 – 25HP (750 gpm max) operate in rotation; 1 – 7.5HP jockey pump (300 gpm) used to reduce cycling of larger pumps). These pumps supply water from the tanks at Zone 1 pressure into Zone 2 (approximately 30 psi higher pressure); (2) Coyote Road Booster Station – located on Coyote Road near the intersection of Scarlett Way. Two pumps (approximately 400 gpm each) are used as a backup supply of water into Zone 2; (3) Lower Levin Tank location – two booster pumps (550 gpm each) pump water into the Upper Levin Tank which supplies Zone 3; (4) Calero Booster Station – two booster pumps (220 gpm each) located at Santa Teresa Golf Course pump water from Zone 1 to the Calero Tank which supplies Calero Lake Estates and Almaden Valley.

6. Identify all treatment and filter facilities, and for each facility provide the capacity, description of its functions, and the address.

Response: Great Oaks has no treatment and/or filter facilities. Chlorine may be injected at Calero Booster Station. See also Exhibit G, Capital Projects Justifications, page 2, item 2 (Water Treatment Plant Additions – Chlorine Ports at Well Sites).

7. Provide the Well Log – Lithology and Construction Diagrams for wells 22, 23, and 24.

Response: ORA has already requested and Great Oaks has already provided this same information in ORA Data Request AL7-004. See GOWC Response to ORA Data Request AL7-004(2).

8. Identify the number of connections in the Coyote Valley Creek Area and the aggregate monthly usage of these connections for the years 2005-2015. If recorded data does not date back to this time period please provide what is available.

Response: There are 37 connections in the Coyote Valley area. See spreadsheet attached and labeled GOWC Response to ORA Data Request AL7-006(8) for monthly usage data.

9. For the Coyote Valley Storage Tank:
- a. What is the projected capacity of the tank?

Response: The first tank is planned to be 500,000 gallons. See Exhibit G, Capital Projects Justifications, page 10, item I (Coyote Valley Storage Tank).

- b. Explain how GOWC derived the projected tank capacity. Please provide all supporting documents.

Response: Tank capacity was recommended by consulting engineer Peder Jorgensen. Capacity is primarily determined by a need to meet fire demand along with additional supplemental supply from other wells. At the appropriate time in the future, Great Oaks would add an additional tank to supply a greater number of customers and to allow more efficient "time of day" pumping. See also GOWC Response to ORA Data Request AL7-001(2) for fire flow requirements.

- c. Explain how the storage tank will draw from and feed to the system?

Response: A single transmission line will connect the tank to the system. The tank will fill at night without booster pumps and will drain when the system pressure allows during the day.

- d. Is there a projected need to install accompanying boosters?

Response: No booster pumps are planned at this time. Booster pumps may be installed in the future if needed to supply water to the golf course up the hill above the tank.

- e. If there is a need to install accompanying boosters, what is the projected capacity of each booster in gpm?

Response: No answer required.

10. For the Santa Teresa Pressure Sustaining Valve:

- a. Have there been instances in the past where the demand in the Coyote Valley Area is not met with the supply from wells 22, 23, and 24? If so, provide the corresponding wells and the dates this occurred.

Response: Yes. 2005, 2007, and 2008. Great Oaks does not understand the reference to “corresponding wells” and requests clarification.

- b. Is the pressure-reducing valve capable of creating two separate water zones, one for the Coyote Valley area south east of the valve and another for the main area Northwest of the pressure-reducing valve?

Response: Yes.

- c. State the projected pressure of the Coyote Valley area after this project is completed.

Response: Coyote Valley will be served by a hydraulic gradeline of more than 400’ elevation. See, e.g., Exhibit G, Capital Projects Justification, pages 10 – 11 (Coyote Valley Storage Tank).

- d. State the projected pressure of the main zone area Northwest of the pressure-reducing valve after this project is completed.

Response: The area Northwest of the pressure-reducing valve will be served by a hydraulic gradeline of approximately 320’ elevation (elevation of Lower Levin and Ashmont tanks).

11. For the Santa Teresa Booster Station:

- a. In which direction will the water flow if this booster station was in operation, out of the Coyote Valley area or into the Coyote Valley area? Please explain.

Response: The booster station will pump water into Coyote Valley.

- b. Explain why the proposed Santa Teresa pressure sustaining valve project alone cannot maintain constant pressure for the Coyote Valley portion of GOWC’s system.

Response: If demand in Coyote Valley is greater than the wells in Coyote Valley can supply, additional water must come from the northwest.

- c. Can wells within the Coyote Valley area be shutoff to reduce pressure within the Coyote Valley area if demand for that area is too low?

Response: Yes, however, with the pressure-sustaining valve, any surplus water in Coyote Valley would be bled off to the lower pressure zone to the northwest, eliminating the need to cycle well pumps on and off.

- d. State the total number of booster pumps and the capacity of each that this project is proposing.

Response: One to three pumps totaling 3,000 to 4,000 gpm.

- e. Is water currently flowing freely from the Coyote Valley area to GOWC's other portion of the system Northwest of the Coyote Valley area?

Response: Yes.

- f. If the answer to 11.e. above is yes, please explain why a booster station is necessary if water is currently already flowing freely in that direction.

Response: A booster station is not currently needed to make water flow in either direction because both valleys are one single pressure zone. In the future, water will flow through the pressure-sustaining valve to the northwest without needing to be pumped. Only water flowing from the low-pressure zone will need to be pumped into Coyote Valley.

- g. If the answer to 11.e. above is no, please give a general description of the water flow direction and the operation of the system between the Coyote Valley area and the rest of GOWC's water system.

Response: No answer required.

12. In Excel spreadsheet format, provide GOWC's depreciation schedule that is used in its ratebase analysis.

Response: See Updated and Corrected Exhibit E, GRC Workpapers, August 17, 2015, page WP-22 for all depreciation calculations and depreciation factors.

**VERIFICATION**

I, John Roeder, am Chief Executive Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-006 and know the contents thereof. I certify that the Responses to Data Request AL7-006, 1 through 11, are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 19, 2015.

\_\_\_\_\_  
/s/  
John Roeder

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-006 and know the contents thereof. I certify that the Response to Data Request AL7-006, number 12, is true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 19, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 31, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-007**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-007 pursuant to the instructions in the originating email containing the Data Request.

Responses to Data Requests

Vehicles:

1. For all existing GOWC vehicles, please provide the following information for each vehicle as of July 31st 2015. If data is not available at the specified date, please provide the information on the vehicles as close to the date of this data request as possible. Please provide the information via Excel spreadsheet.
  - a. Year, make, model, and purchase date of the vehicle.

Response: See document attached and labeled GOWC AL7-007(1).  
b. Cost booked to plant for the vehicle.

Response: See document attached and labeled GOWC AL7-007(1).  
c. Current mileage on the vehicle.

Response: See document attached and labeled GOWC AL7-007(1).  
d. Position the vehicle is assigned to, and name of person currently in that position.

Response: Vehicles are not permanently assigned.  
e. Reason for which a company vehicle is assigned to that person or position.

Response: Vehicles are utilized for water system operations and support purposes.  
f. Was the vehicle used for personal reasons in the past (e.g., commuting to and from work)?

Response: Vehicles are for work purposes.  
g. Percent of travel mileage on the vehicle which can be classified as personal travel.

Response: Negligible.  
h. Additional comments if any.

Response: No answer required.  
2. If any of the vehicles listed in Question 1 is retired, indicate the retirement date, mileage, and reason.

Response: Question 1 asked about existing vehicles. Great Oaks interpreted the question as asking about vehicles currently in use and not retired. Based upon this information, Great Oaks believes that no further answer is required.

3. Indicate which of the vehicles listed in Question 1 is GOWC requesting to replace in this GRC.

Response: The specific vehicles to be replaced will be determined at the time replacement is required based upon condition of the vehicles and expected maintenance expenses.

4. Indicate the probable year, make, and model of the new vehicles being requested in this GRC.

Response: The last “new” vehicles purchased were three (3) 2014 Toyota Tacoma pickup trucks during the last three months of 2013. These Toyota pickup trucks each cost \$21,592. After upgrades (in-bed tool boxes, etc.), the cost is approximately \$24,000 each for the pickup trucks. The most recently purchased vehicle is the 2013 Chevrolet 2500 HD pickup truck purchased “used” in February 2015 for \$40,387.44. Not all costs have yet been allocated to this vehicle. See GOWC Response to ORA Data Request AL7-007(1) for current cost booked to plant. Great Oaks will be using these historic costs for its projections on the pickup trucks requested (two at \$24,000 each) and the ¾-ton pickup truck with crane attachment (\$45,000).

5. Please provide information and supporting documents, such as dealership quotes, on how GOWC came up with each of its vehicle cost estimates as indicated in Exhibit G, p. 14, under the Transportation Equipment table.

Response: See documents attached and labeled GOWC Response to ORA Data Request AL7-007(5). These are purchase documents for the vehicles referenced in the response to number 4, above.

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-007 and know the contents thereof. I certify that the Response to Data Request AL7-007 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 31, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

September 1, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
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Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-008**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-008 pursuant to the instructions in the originating email containing the Data Request. Responses for which Confidential Treatment is requested are noted.

Responses to Data Requests

Contingency:

1. State whether GOWC used a contingency rate of 10% for all its project cost estimates.

Response: Yes, the contingencies were rounded to approximately 10%.

2. If the answer to Question 1 is yes, please indicate how GOWC determined that 10% is an appropriate and reasonable percentage to use in its project cost estimates.

Response: The 10% contingency is based upon past experience with similar projects. The “known-unknowns” may include price changes, small changes in scope, extraordinary events such as weather or labor problems, delays, and other uncertainties.

3. If the answer to Question 1 is no, please list all of the contingency rates used in GOWC’s cost estimates in this GRC.

Response: No response required.

- a. Additionally, provide an explanation and/or documentation that supports why each of the contingency rates are appropriate and reasonable.

Response: See response to question number 2, above.

Project Cost Estimates:

4. For the following projects, indicate how GOWC derived its project cost estimates in each of the cost categories seen below (as listed in Exhibit G of the GRC application). Provide all supporting documents for the cost estimate. If no supporting documents can be provided, explain how GOWC came up with its cost estimate for each category.

- a. Well 23A

Response: Objection. This question has been asked and answered. Without waiving this objection, see Great Oaks’ Response to ORA Data Request AL7-002.

- i. Property Acquisition - \$120,000
- ii. Engineering - \$10,000
- iii. Drilling - \$200,000
- iv. Pump, Motor, Discharge Piping, Fence - \$96,000
- v. DWSAP and CEQA Compliance Costs - \$12,000

- b. Well 24A

Response: Objection. This question has been asked and answered. Without waiving this objection, see Great Oaks’ Response to ORA Data Request AL7-002.

- i. Property Acquisition - \$60,000
- ii. Engineering - \$10,000
- iii. Drilling - \$180,000
- iv. Pump, Motor, Discharge Piping, Fence - \$96,000
- v. DWSAP and CEQA Compliance Costs - \$12,000

- c. Well 25

**Response:** Objection. This question has been asked and answered. Without waiving this objection, see Great Oaks' Response to ORA Data Request AL7-002.

- i. Property Acquisition - \$120,000
  - ii. Engineering - \$18,000
  - iii. Drilling - \$180,000
  - iv. Pump, Motor, Discharge Piping, Fence - \$78,000
  - v. Electrical Service and Panel - \$85,000
  - vi. Fence and Site Construction - \$26,000
  - vii. SCADA Controls and Communication - \$7,500
  - viii. DWSAP and CEQA Compliance Costs - \$12,000
  - ix. Main Extension on Richmond Road - \$190,000
  - x. Permits - \$6,000
- d. Water Treatment Plant Additions – Chlorine Ports at Well Site
- i. Labor and Equipment - \$5,000/site

**Response:** This is an estimate of the average cost of installing a chlorine injection port on the discharge pipe, a water source on the discharge pipe, an enclosure for chlorine tank and pump, piping to and from the enclosure, conduit from the electric panel to the enclosure, electric breakers and receptacles. Each well site layout is unique and some sites will require more work than others. The cost of enclosures, piping, conduit, and electrical is minimal and is based upon our experience with similar projects. The largest cost component is labor. Great Oaks employees will likely do most of the work.

- e. Brookmere Drive to Manila Drive Tie-In
- i. Easement Cost, including Legal Exp. - \$30,000

**Response:** Great Oaks requests CONFIDENTIAL TREATMENT of this response  
[Redacted text block consisting of approximately 12 lines of blacked-out content]

- f. Country View Drive Main Extension
- i. Contract - \$267,000

Response: See contract estimate from Northern Underground Construction, Inc. included on the document attached and labeled GOWC Response to ORA Data Request AL7-008(cost estimates).

- g. Main Relocation to Rahway Drive
- i. Contract - \$282,000

Response: See contract estimate from Northern Underground Construction, Inc. included on the document attached and labeled GOWC Response to ORA Data Request AL7-008(cost estimates).

- h. Santa Teresa Pressure Sustaining Valve
- i. Labor and Equipment - \$70,000

Response: The price of the 18" flow control valve is \$30,886 plus tax as shown on the document attached and labeled GOWC Response to ORA Data Request AL7-008(4.h.). The additional equipment includes 2 18" by 20" tapping sleeves, 2 18" valves, 2 18" 90 degree elbows, 2 valve cans, 4 pieces of 18" pipe, pipe restraints, large vault and installation. These costs were estimated based upon prior installation of similar equipment.

- i. Santa Teresa Booster Station
- i. Labor, Equipment, and Property - \$140,000

Response: The engineering is not complete and the pump or pumps have not been sized or sourced. We have not determined whether property must be purchased or a pump may be located in the road right of way. This is a rough estimate.

- j. Coyote Valley Storage Tank
- i. Property Acquisition - \$240,000

Response: Great Oaks requests CONFIDENTIAL TREATMENT of this response

- ii. Engineering - \$40,000

Response: Based on verbal estimate from engineer.

- iii. Site Preparation and Access Road - \$90,000

Response: This is just an assumption until a site is chosen.

- iv. Tank Construction - \$600,000

Response: Based on engineer's estimate.

- v. Fence - \$18,000

Response: Estimate, based on construction cost of other fences.

- vi. Permits - \$4,000

Response: Estimate based on other county permit costs.

- vii. CEQA Compliance Costs - \$24,000

Response: Estimate, based on prior CEQA compliance costs. If a geotechnical engineer is required to complete the CEQA review, additional cost will be incurred.

- viii. Contingency - \$107,000

Response: Approximately 10%.

- k. SCADA System Replacement and Upgrade
  - i. New RTUs, radios, and related equipment - \$9,500/site

Response: The radios, antennas, and RTUs may be under \$3,000 per site to purchase. The RTUs have not been chosen, but we are currently setting up radios at two sites for testing. Installation is the largest component of the cost. Each site is different, but all sites are expected to use tall poles that must be cemented into the ground. Great Oaks employees can do most of the work, including burying conduit for power and communication cabling.

- ii. New SCADA computer and software - \$10,300

Response: The cost of the upgrade of Wonderware software is \$7,603 as shown on the documents attached and labeled GOWC Response to ORA Data Request AL7-008(4.k.). The computer is estimated to cost \$1,500 to \$2,000. It is expected that additional cabling and routers will be needed since the communications protocol is different than the existing system.

- iii. Reprogramming - \$18,000

Response: Estimate is based upon time for Great Oaks' IT Specialist to convert the current ladder logic into a compatible form for the new RTUs.

- l. Hydraulic Modeling Software
  - i. Software - \$14,000

Response: Attached and labeled GOWC Response to ORA Data Request AL7-008(4.1.) is a quote for InfoWater software at \$17,000 for unlimited links. We expect to be able to purchase software for under \$14,000 for a finite number of links. As part of the modeling, portions of the water system model can be skeletonized reduce the number of links, thus allowing quicker computing and lower cost software.

ii. Engineering, Verification, and Training - \$32,000

Response: Two quotes are attached and included with GOWC Response to ORA Data Request AL7-008(4.1.), with the lowest being \$44,000. Unless a lower bid is found, the cost of modeling will be higher than projected in Exhibit G.

5. In EXCEL spreadsheet format, for each of the following accounts found in GOWC's WP 16 and 17, provide the recorded EOY balances for the years 2010 to 2014, and the recorded 2015 balance as of June 30th 2015:

Account 341 - Structures & Improvements  
 Account 342 - Reservoirs & Tanks  
 Account 343 - Transmission & Distribution Mains  
 Account 344 - Fire Mains  
 Account 345 – Services  
 Account 346 – Meters  
 Account 347 - Meter Installations  
 Account 348 – Hydrants  
 Account 349 - Other Transmission & Distribution Plant

Account 371 - Structures & Improvements  
 Account 372 - Office Furniture & Equipment Excluding Computers  
 Account 372 - Office Furniture & Equipment - Computers  
 Account 373 - Transportation Equipment  
 Account 375 - Laboratory Equipment  
 Account 376 - Communication Equipment  
 Account 377 - Power Operated Equipment  
 Account 378 - Tools, Shop, & Garage Equipment  
 Account 379 - Other General Plant

Response: See document attached and labeled GOWC AL7-008(5).

Account ??? - Capitalized Direct Labor  
 Account ??? - Capitalized 10.6% Management Labor Allocation  
 Account ??? - Total Capitalized Labor  
 Account ??? - Capitalized Fringe Benefits Allocation

Response: The four items above are not accounts. No answer required.

6. Exhibit E – WP10 – Employees and Salaries: To determine the “percentage field service labor capitalized” of 10.57% used in this GRC, GOWC used the recorded historical capitalized field service direct labor for the years 2010 to 2014. Explain how GOWC determined the amounts recorded as “capitalized field service direct labor” for the years 2010 to 2014 were reasonable, appropriate, and reflective of actual direct labor that was allowed to be capitalized in the first place. Provide all supporting documents.

Response: Objection. This data request assumes a fact that is not true. The data request is also argumentative. Without waiving these objections, Great Oaks responds and states that it utilizes the Commission-authorized 10.6% capitalized payroll allocation. This percentage has been in use for multiple Great Oaks rate case cycles and was most recently approved in Great Oaks’ 2012 general rate case. See D.13-05-020; see also Appendix A to D.13-05-020 (Settlement Agreement in which Great Oaks and ORA agreed to the 10.6% capitalized payroll percentage).

7. Exhibit E – WP10 – Employees and Salaries: Explain how GOWC derived the percentage of 10.60% for “Management Allocation Amount Applied To Capitalized CIP” and provide all supporting documents.

Response: See objection and response to data request AL7-008, number 6, above. The 10.6% allocation was not “derived” by Great Oaks, but is instead Commission authorized and the subject of an agreement between ORA and Great Oaks.

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: September 1, 2015

\_\_\_\_\_/s/  
 Timothy S. Guster  
 Vice President and General Counsel  
 Legal and Regulatory Affairs  
 Great Oaks Water Company  
 PO Box 23490  
 San Jose, CA 95153  
 Telephone: (408) 227-9540  
 Facsimile: (408) 227-7126  
 Email: tguster@greatoakswater.com

**VERIFICATION**

I, John Roeder, am Chief Executive Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-008 and know the contents thereof. I certify that the Responses to Data Request AL7-008, numbers 1, 2, 3, and 4, are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 1, 2015.

\_\_\_\_\_  
/s/  
John Roeder

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-008 and know the contents thereof. I certify that the Response to Data Request AL7-008, numbers 5, 6, and 7, are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 1, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

September 2, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-009**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-009 pursuant to the instructions in the originating email containing the Data Request. For those responses for which Confidential Treatment is requested, the request is provided as part of the response.

Responses to Data Requests

1. For all authorized, but not completed, plant addition projects from A.12-07-005 and A.09-09-001, please provide the following in EXCEL spreadsheet format:
  - a. GRC authorized in.
  - b. Project name.
  - c. Project status (e.g. land acquisition, permitting, designing, constructing, delayed, determined unnecessary, postponed indefinitely, etc.).
  - d. Project description.

- e. Authorized project cost.
- f. Authorized completion date.
- g. Recorded expenditure as of 7/31/2015.
- h. Estimated in service date.
- i. Additional comments.

Response: Great Oaks requests CONFIDENTIAL TREATMENT of this response [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

2. For all authorized advice letter projects in A.12-07-005 and A.09-09-001, please provide the following in EXCEL spreadsheet format:

Response: As referenced in D.10-11-034, Great Oaks and ORA (then DRA) agreed that Great Oaks may submit the "Country View Tank" project, when complete, by advice letter and there should be a cap of \$385,000. No other "advice letter projects" were "authorized" in A.09-09-001. As referenced in D.13-05-020, Great Oaks and ORA agreed that the Well 2 Pump Storage Building project, upon completion, would be presented for addition to rate base through the filing of a Tier 3 advice letter, subject to a reasonableness review. No other "advice letter projects" were "authorized in A.12-07-005. Based upon this information, Great Oaks responds to the remaining subparts of this data request as follows:

a. GRC authorized in.

Response: See above.

b. Project name.

Response: See above.

c. Project status (e.g. completed, land acquisition, permitting, designing, constructing, delayed, determined unnecessary, postponed indefinitely, etc.).

Response: Country View Tank: land acquisition process started (litigation). See Exhibit I, Litigation Summary. Well 2 Pump Storage Building: construction nearing completion.

d. Project description.

Response: See A.09-09-001 and D.10-11-034 for Country View Tank project. See A.12-07-005 and D.10-11-034 for Well 2 Pump Storage Building.

e. Authorized project cost.

Response: Authorized project costs have not been determined as of this date. These are “advice letter projects,” and, as such, authorized costs will be determined through the advice letter process.

f. Authorized completion date.

Response: No “authorized completion dates” established.

g. Recorded expenditure as of 7/31/2015.

Response: Country View Tank: \$27,579.28. Well 2 Pump Storage Building: \$389,508.36. Final amounts to be determined upon completion.

h. Recorded in service date if project is completed, or estimated in service date if project is still outstanding.

Response: Country View Tank – unknown at this time due to continuing litigation. Well 2 Pump Storage Building: 2015/2016 rate year.

i. Additional comments.

Response: No answer required.

**VERIFICATION**

I, John Roeder, am Chief Executive Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-009 and know the contents thereof. I certify that the Responses to Data Request AL7-009, numbers 1, 2.a. through 2.f., 2.h., and 2.i., are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 2, 2015.

/S/

John Roeder

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-009 and know the contents thereof. I certify that the Response to Data Request AL7-009, number 2.g., is true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 2, 2015.

/S/

Ron Ceolla



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

September 4, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
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Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-010**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-010 pursuant to the instructions in the originating email containing the Data Request. For those responses for which Confidential Treatment is requested, the request is provided as part of the response.

Responses to Data Requests

1. On page 6 of the 2013 Sanitary Survey Findings Report, CDPH/SWRCB had a list of recommended items for GOWC to include in its Emergency Disinfection Plan. Per GOWC’s response to data request AL7-004 Question 3, it appears that GOWC’s latest Emergency Disinfection Plan has not been updated to reflect these recommendations. Please explain this discrepancy.

Response: See Great Oaks Supplemental Response to ORA Data Request AL7-004, including GOWC SR AL7-004(3), sent August 28, 2015.

2. When does GOWC expect to complete the new version of its Emergency Disinfection Plan incorporating CDPH/SWRCB’s recommendations?

Response: See response to question number 1, above.

3. Explain how GOWC currently determines if there are contaminants in its system.

Response: Monitoring is conducted pursuant to legal and regulatory requirements. See, e.g., Title 22.

4. Explain how often and at which locations GOWC currently tests for contaminants.

Response: See document attached and labeled GOWC Response to ORA Data Request AL7-010(4). Sample are taken weekly at the sites listed in the first two columns (Site Number and Address). Source monitoring under Title 22 is addressed in the attached Declaration of Michael A. Carey.

5. In this GRC, GOWC is requesting to install chlorine ports at all well sites.

a. Does GOWC plan to start regular chlorination of its water supply? Please explain.

Response: No. “Regular chlorination” of the “water supply” is not necessary at this time.

b. Under what situation(s) will these chlorine ports be used?

Response: See GOWC SR AL7-004(3). Chlorine ports will be used only when necessary to respond to specific instances of contamination.

c. How often does GOWC anticipate using these chlorine ports?

Response: Only as often as is necessary to comply with water quality standards and to respond to specific instances of contamination.

d. How much chlorine does GOWC anticipate storing at each well site?

Response: None.

e. If left unused, how often will the chlorine need replacing?

Response: Typically, unused chlorine will lose approximately one percent (1%) of its concentration after one week of storage. The lower-concentrated chlorine is still useful, however, with amounts used adjusted based upon the lower concentration. Great Oaks has no plan to purchase so much chlorine that it would become useless and need to be replaced.

f. How will GOWC dispose of unused chlorine at time of replacement?

Response: Properly.

- g. What is the estimated useful life of each chlorine port?

Response: With proper maintenance, indefinitely.

6. GOWC states that seven of its existing wells have chlorine ports:

- a. List each of the seven wells that have chlorine ports installed and the date of installation for each.

Response: Objection. This data request is not reasonably calculated to lead to the discovery of relevant evidence pertaining to any issue in this proceeding. Without waiving this objection, Great Oaks states: Great Oaks will search its records for the requested information, but it would be helpful if ORA would explain why this information is needed and identify each issue in the pending matter that is affected by this requested information. Wells 15, 18, 20, 21, 22, 23, and 24 have chlorine ports at this time. Of these, the chlorine ports at wells 20, 21, 22, 23, and 24 were installed (upon information and belief) at the time the wells were constructed. The chlorine ports at wells 15 and 18 were added at some time after initial well construction, although the exact dates have yet to be determined.

Great Oaks adds that chlorine ports have since been added to wells 2 and 8 in 2015 as part of its implementation of the plan approved by the State Water Board. See Great Oaks Supplemental Response to ORA Data Request AL7-004, including GOWC SR AL7-004(3), sent August 28, 2015.

- b. Have there been incidents in the past that required GOWC to use these ports?

Response: In the past there have been justifiable reasons to use some of the chlorine ports.

- c. If the answer to question 6.b is yes, please provide the date, the well site that the port is located at, and a description of each incident that required the use of the chlorine port.

Response: The chlorine ports at wells 15 and 18 were used to address bacteria in those wells. The chlorine ports operate when the wells operate. The exact dates are to be determined. Great Oaks repeats its request that ORA explain how this information has anything whatsoever to do with any issue in this proceeding.

- d. Explain how the chlorine ports are controlled and operated.

Response: Chlorine injectors at the wells are used and controlled manually.

- e. State whether the chlorine ports are linked to GOWC's SCADA system.

Response: No. The chlorine ports at the wells are not linked to GOWC's SCADA system. While not asked, Great Oaks states that the chlorine analyzer at the Calero Booster Station, however, is linked to the SCADA system.

7. In PDF format, provide a system map highlighting the areas affected by the March 2015 MCL violation and the September 2013 MCL violation.

Response: See document attached and labeled GOWC Response to ORA Data Request AL7-010(7). This is the map for 2015. Great Oaks will supplement this response if necessary. Great Oaks requests ORA to identify any issue in this proceeding that relates to this data request.

8. List the measures GOWC is taking to prevent similar incidences of MCL violations from occurring in the future.

Response: See document attached and labeled as GOWC Response to ORA Data Request AL7-010(8). See also GOWC Supplemental Response to ORA Data Request MC8-002, number 25.

9. GOWC's notice to customers for the March 2015 MCL violation states: "Great Oaks will continue flushing pipes throughout our distribution system to help prevent bacterial growth in the pipes." Does GOWC currently have a main flushing program?

Response: Yes.

- a. If GOWC does, describe the time frame, extent and cost of the program.

Response: See GOWC Supplemental Response to ORA Data Request MC8-002, number 25. Cost is variable and depends primarily upon the amount of water used in flushing operations and labor. Time frame also depends upon the specific flushing operation taking place. During the current drought, Great Oaks has reduced flushing as part of the overall effort to conserve water.

- b. If not, explain why not and provide an estimated cost if GOWC were to implement a main flushing program.

Response: No answer required.

10. In response to MDR Section II. E Question 17, GOWC presented Exhibit 8-2. A letter by the US EPA dated April 9<sup>th</sup>, 2004 is presented confirming GOWC's compliance with EPA Vulnerability Assessment. Another letter by GOWC dated August 23, 2004 was presented confirming GOWC's compliance and completion of an Emergency Response Plan. Both documents are more than ten years old.

Separately on page 6 of the 2013 Sanitary Survey Findings Report CDPH/SWRCB stated that "[t]he Department has a copy of the Company's Emergency Response Plan (ERP) dated March 17, 2008 on file."

State whether the documents presented in Exhibit 8-2 are the most recent documents GOWC has confirming GOWC's compliance with EPA Vulnerability Assessment and Office of Emergency Services Response Plan.

Response: Yes.

- a. If the answer to question 10 is no, explain why the most recent documents were not presented in response to MDR Section II.E Question 17 and provide the most recent documents.

Response: No answer required.

- b. If the answer to question 10 is yes, explain why an Emergency Response Plan dated March 17, 2008 was referenced by the CDPH/SWRCB in the 2013 Sanitary Survey Findings Report.

Response: The plan was updated to reflect changing personnel within Great Oaks.

11. On page 6 of the 2013 Sanitary Survey Findings Report, CDPH/SWRCB stated that "the Company indicated they are currently revising their ERP [Emergency Response Plan]."

- a. Please provide the status of stated revision.

Response: Pending. The revisions are not yet complete.

- b. List the anticipated completion date for GOWC's revised ERP.

Response: 2016

12. For each customer complaint related to water quality from 2012 to present:

- a. List the time, date, and location the complaint was reported.

Response: Most of the complaints were received by telephone. From the complaints, Great Oaks responded to each complaint.

- b. Provide a PDF copy of each complaint, if received via email or US mail.

Response: No "PDF" copy exists of complaints received by telephone. Great Oaks will search for copies of any complaints received by email or US mail and provide a supplemental response for those that are located.

- c. List GOWC's response to each complaint.

Response: Each response is dependent upon each specific complaint. For most, an employee goes to the location of the complaint and investigates the complaint. The investigation typically takes place in the presence of the customer.

d. Describe the actions taken by GOWC related to the complaint.

Response: See response to subpart c., above.

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: September 4, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
Timothy S. Guster  
Vice President and General Counsel  
Legal and Regulatory Affairs  
Great Oaks Water Company  
PO Box 23490  
San Jose, CA 95153  
Telephone: (408) 227-9540  
Facsimile: (408) 227-7126  
Email: tguster@greatoakswater.com

**VERIFICATION**

I, Michael Carey, am Water Quality Manager of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-010 and know the contents thereof. I certify that the Responses to Data Request AL7-010 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 4, 2015.

/S/

Michael Carey



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

September 14, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-011**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-011 pursuant to the instructions in the originating email containing the Data Request. For those responses for which Confidential Treatment is requested, the request is provided as part of the response.

Responses to Data Requests

Vehicles:

1. For all GOWC vehicles retired from 1/1/2012 through 7/31/2015, please provide the following information for each vehicle in Excel spreadsheet format:
  - a. Year, make, model, and purchase date of the vehicle.
  - b. Date of retirement.
  - c. Cost booked to plant for the vehicle.

- d. Mileage at time of retirement.
- e. Explain what GOWC did with the vehicle after its retirement.
- f. State the final cost/proceeds of retiring the vehicle.
- g. If vehicle was sold, state which account the proceeds were booked to.
- h. If the vehicle was scrapped, state which account the expense was booked to.

Response: See document attached and labeled GOWC Response to ORA Data Request AL7-011(1).

2. Explain the purpose of GOWC's 2009 BMW X5 and the 2005 Pontiac GTO.

Response: Each vehicle is used for business purposes to transport Great Oaks employees conducting the activities of the regulated utility. The X5 is capable of transporting five employees, while the GTO is capable of transporting four employees. Both vehicles are capable of transporting equipment, with the X5 having a greater capacity to do so than the GTO.

3. Explain why the purchase of a \$45,167 used BMW X5 was necessary in lieu of more frequently purchased and lower cost fleet vehicles such as Ford Taurus, Ford Fusion, Toyota Prius, etc.

Response: Objection. The data request incorrectly assumes that the purchase of one vehicle would qualify for a volume or "fleet" discount. In addition, the data request is, by its nature, argumentative. The data request is also not reasonably calculated to lead to the discovery of relevant evidence pertaining to any issue in this proceeding. The subject vehicle was purchased more than four years ago and was included in utility plant in service through Great Oaks' last general rate case. Without waiving these objections, Great Oaks responds by stating that vehicles purchased by Great Oaks are selected based upon the intended uses of the vehicles and the relative value of the vehicles for those intended uses. The X5 will likely have a significantly longer useful life than any of the "fleet" vehicles referenced in ORA's data request. To Great Oaks, it makes no sense to buy a cheap vehicle that will require earlier replacement, presumably with another cheap vehicle, when buying a quality used vehicle that costs less in the long run is possible.

4. Exhibit G, p. 14 of GOWC's GRC application states: "Five current service vehicles have been used for more than 130,000 miles each. The Company plans to replace those five vehicles." GOWC then lists in a table the type, year, and cost of the planned replacement vehicles.

From the list of existing vehicles provided to ORA in data request AL7-007, attachment "GOWC Response to ORA Data Request AL7-007(1)," for each of the five requested new vehicles, identify the corresponding current service vehicle that the requested new vehicle is replacing.

Response: The current service vehicles that will be replaced are the following: (1) 2005 Ford Ranger (136,533 miles); (2) 2005 Ford Ranger (141,473 miles); (3) 2004 Ford

Ranger (162,428 miles); (4) 2003 Dodge Dakota (151,685 miles); and (5) either 2004 Ford F250 (138,285 miles) or 1999 Ford F250 (154,796 miles).

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: September 14, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
 Timothy S. Guster  
 Vice President and General Counsel  
 Legal and Regulatory Affairs  
 Great Oaks Water Company  
 PO Box 23490  
 San Jose, CA 95153  
 Telephone: (408) 227-9540  
 Facsimile: (408) 227-7126  
 Email: tguster@greatoakswater.com

### VERIFICATION

I, Ron Ceolla, am Chief Financial Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-011 and know the contents thereof. I certify that the Responses to Data Request AL7-011 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 14, 2015.

\_\_\_\_\_/s/\_\_\_\_\_  
 Ron Ceolla



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

September 14, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-012**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-012 pursuant to the instructions in the originating email containing the Data Request. For those responses for which Confidential Treatment is requested, the request is provided as part of the response.

Responses to Data Requests

1. GOWC’s Exhibit G, p.10 states: “A water storage tank built on the southwest foothills will provide constant pressure and more dependable fire protection for all customers in this portion of the Company’s service area.”

a. Does GOWC currently meet all pressure requirements set forth in GO-103A for the service area referred to in the statement above?

Response: Yes, with a qualification.

b. Does GOWC currently meet all pressure requirements set forth in the California Code of Regulations for this service area referred to in the statement above?

Response: Objection. The data request is unduly vague and ambiguous. ORA is requested to specify which “pressure requirements” it is referencing in this data request so as to permit Great Oaks to respond.

c. If the answer to Question 1, subparts a or b is no, identify what specific requirements of GO-103A and/or the California Code of Regulations are not currently being met.

Response: While the answer to subpart a. of this data request was not “no,” Great Oaks did qualify its answer. General Order 103-A requirements for pressure do not apply to “areas,” but instead apply to services connections. Beginning in approximately mid-June of 2015, the minimum operating pressure at two service connections in the portion of area referenced in this question dropped to below 40 psi during periods other than “near PHD” as a result of lower flow rates from groundwater supply wells. The pressures can be increased to 40 psi by simply partially closing a valve, however that would decrease the maximum fire flow supply for the charter school on Monterey Road. The lower flow rates are due to lower groundwater levels caused by inadequate groundwater recharge and the build up of silt in the wells. Consistent with General Order 103-A, Great Oaks has proposed changes to the existing water system to address the causes of the lower pressure in this general rate case (new water supply wells, pressure sustaining valve, storage tank), which, when built, will remedy any service connection low pressure situations. The service connection low pressure situations will likely only get worse over time, making the authorization and building of the proposed improvements essential.

d. If the Answer to Question 1, subparts a or b is no, please provide all supporting evidence to support GOWC’s claim that it is not meeting all pressure requirements set forth in GO-103A and/or the California Code of Regulations.

Response: See response to subpart c., above.

e. Does GOWC currently meet all fire protection requirements of all applicable regulating standards not already discussed as part of GOWC’s response to Question 1, subparts a-d, for this service area? If not, please provide all supporting evidence to support GOWC’s claim that it does not currently meet all fire protection requirements of all applicable regulating standards.

Response: Objection. The data request is unduly vague and ambiguous. ORA is requested to specify which “fire protection requirements of all applicable regulating standards not already discussed” it is referencing in this data request so as to permit Great Oaks to respond.

f. State the highest fire flow demand needed in the mentioned service area and at which building this highest fire flow demand is needed.

Response: The highest fire flow demand (approximately 6,000 gpm) is needed at the IBM building located on Bailey Road.

2. Explain how GOWC determined that a capacity of 500,000 gallons is necessary for the currently requested Coyote Valley Storage Tank. Please provide all calculations and supporting evidence.

Response: Great Oaks' outside engineer, Peder Jorgensen, recommended the capacity. He recommended that the working capacity of the tank be 20% of the total size and the remaining 400,000 gallons would provide 100,000 gph or 1,625 gpm of supplemental fire flow ( $4 \times 100,000 + 100,000 = 500,000$ ).

3. GOWC is requesting to purchase a property that will be large enough for "a future tank" in addition to the currently proposed 500,000 gallon Coyote Valley Storage Tank. Explain how the portion of property for the future tank will be used and useful within this general rate case cycle.

Response: That portion of property would be used for construction of the first tank and then equipment and pipe storage until the future tank is built.

4. When does GOWC estimate the need to construct the "future tank" (different from the currently proposed 500,000 gallon Coyote Valley Storage Tank)?

Response: Great Oaks would construct the "future tank" only when needed. Need would likely be based upon future development in Coyote Valley, which at the present time is uncertain.

5. Explain how GOWC derived its estimated capacity of 500,000 gallons or larger for the "future tank" (different from the currently proposed 500,000 gallon Coyote Valley Storage Tank). Please provide all calculations and supporting documents.

Response: The ultimate combined volume of the two tanks should basically be equal to the fire protection reserve volume plus the working volume. Neither of these components are (or can be) known at this time. If it is presumed that 5,000 gpm is the maximum fire flow to be supplied by the tank for four hours, then 1,200,000 gallons would need to be maintained in addition to the working volume. The working volume would be the greater of that volume needed for proper pump sequencing operations and pressure maintenance or the volume needed for "time of day" pumping. If night-time pumping is presumed to be at a rate of 2,000 gpm for 10 hours, this would add a need for an additional 1,200,000 gallons of storage. The total capacity in this example would be 2,400,000 gallons or one 500,000-gallon tank and another 1,900,000 gallon tank. Because this is an example based upon presumptions, there are no supporting documents.

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: September 14, 2015

\_\_\_\_\_/s/  
 Timothy S. Guster  
 Vice President and General Counsel  
 Legal and Regulatory Affairs  
 Great Oaks Water Company  
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### VERIFICATION

I, John Roeder, am Chief Executive Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-012 and know the contents thereof. I certify that the Responses to Data Request AL7-012 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 14, 2015.

\_\_\_\_\_/S/  
 John Roeder



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
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September 17, 2015

***Via email to:***

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Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-013**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-013 pursuant to the instructions in the originating email containing the Data Request. For those responses for which Confidential Treatment is requested, the request is provided as part of the response.

Responses to Data Requests

1. According to GOWC’s response to data request (DR) AL7-005 GOWC’s system’s MDD is at 82.85 acre-feet/day, while the Coyote Valley Area’s MDD is at 5.89 acre-feet/day, or 7.1% of the system MDD. However, GOWC’s Reponse to DR MC8-002 question 7(b) shows the wells 22, 23 and 24 at the Coyote Valley area have been consistently providing more than 35% of the total system’s water supply for the past 5 years. Please explain why the wells for the Coyote Valley area that historically uses

approximately 7% of the total system demand, supply 35% or more of the total system supply.

Response: First of all, to accurately compute the usage in Coyote Valley, IBM (Great Oaks' largest single customer) should be included. Its plant is in Coyote Valley along Bailey Avenue, but its meter is on the back side of the hill behind the plant. IBM would like to get service on Bailey, but Great Oaks cannot presently provide sufficient pressure for the buildings. Consequently, IBM pumps into its own tanks to supply the required pressure. IBM uses up to 20 acre-feet per month. Additionally, the wells in Coyote Valley supply 100% of the water to Almaden Valley where Great Oaks has no wells. Pipes connect the three valleys. There is no reason to have any correlation between the location where water is pumped and where it is consumed.

2. State GOWC's reasons for designating wells 3, 15, 16, and 18 as standby.

Response: In 1998, the pump in Well 3 was removed due to MTBE contamination from a nearby gas station. In 2004, Great Oaks reinstalled the pump into Well 3 after removing a bentonite plug that separated water aquifers. Because Well 3 had not been tested for several years, all testing would have to be completed before Great Oaks could put it on active status. In 2004, Wells 10, 11, 12, 20, and 4 were all working and able to provide water in close proximity to Well 3. Well 3 was needed only for emergencies at that point and Great Oaks chose to save the testing costs and leave it on standby status. It has been and remains able to be used at any time for limited durations. In 2003, Well 16 was shut down due to MTBE contamination from a nearby gas station and remained off for many years while the groundwater was cleaned of MTBE. Although Well 16 could be used in an emergency, it was not used on a regular basis as not to interfere with the contamination cleanup and was therefore put on standby status in 2006 before Title 22 and UCMR testing would have to be done in 2007. Both Wells 15 and 18 require chlorination and are therefore the last wells that Great Oaks would choose to use. Because those wells were operated on a last resort basis anyway, they were changed to standby status in 2006 to save testing expense in 2007.

3. State whether wells 3, 15, 16, and 18 are recognized by DDW as standby wells or as active wells.

Response: Great Oaks has recently been given authority by DDW to return Well 16 back to active status. Wells 3, 15, and 18 are still recognized as standby wells.

4. Explain why wells 3, 15, 16, and 18 are not retired if they have been on standby since 2002 or earlier.

Response: There is no limit to the period of time that wells can be designated as standby. There is no reason to retire the wells.

5. Please explain why the chlorine ports requested by GOWC are necessary for wells 3, 15, 16, and 18 if the wells have been in standby mode since 2002 or earlier.

Response: Wells 15 and 18 already have chlorine ports and are not among the 12 wells that need chlorine ports installed. Wells 3 and 16 are no different than "active" wells as relating to the need for chlorine. Great Oaks can still use standby wells at any time. Other than the frequency of use, the need for chlorine may be no different than any other well.

6. Have there been efforts in the past to bring wells 3, 15, 16, and 18 back into active status? If so, please list the dates, procedures taken, and results of these efforts. If not, please explain.

Response: At this time Well 16 is on active status, but it has only been operated for short periods for the purpose of testing. Great Oaks plans to test the pumping drawdown level to determine how close the pump is to drawing air. The static water table at the end of August was 84 feet deep and the casing perforations begin at 100 feet. With the water table constantly dropping, sustained pumping will either draw air now or in the near future. There have been no efforts or reasons to put Wells 3, 15, and 18 on active status. The same bacteria/chlorination issue exists with Wells 15 and 18. Great Oaks is considering setting the pump deeper with a packer in Well 15 because the groundwater is only 5 feet above the perforations. Well 3 is able to run at any time, however the static water level is within 16 feet of the perforations and the drawdown has been greater than 16 feet in the past. Reduction of the flow rate will be necessary as the water level continues to drop.

7. Please explain why wells 4, 7, and 19 have consistently recorded close to 0% water production over the past 3 years.

Response: Well 7 pumps some sand upon initial startup, so it is only operated 24 hours per day after being started or occasionally for testing. Well 4 is a little less efficient than other wells, however recently the groundwater has dropped to below the casing perforations causing it to pump air even at low flow rates. Well 19 is a little less efficient and is located in an area of the system that needs water supply only during high demand periods.

8. Explain what efforts and estimated cost would be necessary to increase the yields of wells 4, 7, and 19.

Response: Well 4 requires higher groundwater or a smaller pump and motor located deeper with an inflatable packer to limit drawdown. Great Oaks does not know the cost. Wells 7 and 19 had larger pumps and motors at one time but experienced excessive sand production so the pumps were changed to small lower-flow rate pumps.

9. State the estimated cost of installing sand separators at wells 1 and 7.

Response: Great Oaks does not know the cost of installing a sand separator at well 7 (and has not proposed such an installation). It would be nearly impossible to install a separator at Well 1 because of the size of the well property.

10. GOWC's reponse to DR MC8-002 question 7(b) shows for the year 2014, wells 2, 11, and 21 produced more than 38% of the total system's water supply. Explain why the load was not spread more evenly among the other 13 wells located in the Santa Teresa Sub-basin.

Response: Wells 2, 11, and 21 were efficient and better located than other wells. They did not have sand or bacteriological problems.

11. GOWC's reponse to DR MC8-002 question 7(b) shows that as of May 2015, wells 2, 8, 12, and 21 produced more than 38% of the total system's water supply. Explain why the load was not spread more evenly among the other 12 wells located in the Santa Teresa Sub-basin.

Response: Wells 8 and 12 have replaced Well 11 for almost a year. The low groundwater level has caused Well 11 to have recurring bacteria problems. Well 8 has been used in much of 2015 to chlorinate the northwest portions of the system where Great Oaks has had multiple positive bacteriological samples.

12. Please explain GOWC's process in determining which wells to pump from to meet the demands within its system.

Response: Some wells can be run manually 24-hours per day and most wells are staged on and off controlled by tank levels. Wells are typically operated 24-hours per day when important to maintain pressure in a particular part of the system. Wells that are called on and off by tank levels are chosen to be controlled by one of two tanks based on their proximity to each tank. The most efficient pumps are chosen to be called by the tank first and less efficient pumps are chosen to be called later and consequently less frequently. Wells producing sand on startup are usually run manually during heavy demand periods. Wells with bacteriological problems are the last wells to operate and only manually because the chlorinators must be filled manually. During periods of extended power outages, the wells with generators are operated.

13. State whether the wells located in the Santa Teresa Sub-basin alone can meet all scenarios of demand for the service area located above the Santa Teresa Sub-basin, without water supply coming from the Coyote Valley area. Please explain.

Response: Yes, however the pressure would be reduced in the southeast portion of the system. Great Oaks would experience more dry wells sooner because the groundwater would be depleted quicker. Great Oaks would also have trouble balancing the tanks due to uneven pressures within the system.

### VERIFICATION

I, John Roeder, am Chief Executive Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-013 and know the contents thereof. I certify that the Responses to Data Request AL7-013 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 17, 2015.

\_\_\_\_\_  
/S/  
John Roeder



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
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September 16, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
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Lisa Bilar, Program and Project Supervisor  
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Alex Lau, Utilities Engineer  
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**RE: Great Oaks Water Company Responses to ORA Data Request AL7-014**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-014 pursuant to the instructions in the originating email containing the Data Request. For those responses for which Confidential Treatment is requested, the request is provided as part of the response.

Responses to Data Requests

1. Per GOWC’s response to ORA’s data request AL7-003 Question 1, GOWC provided a spreadsheet titled “GOWC Res AL7-003(1).”
  - a. In this spreadsheet in column G titled “GOWC Funded,” for each project that GOWC answered “Yes-Expensed” please indicate which expense account(s) each project is recorded in.

Response: See document attached and labeled GOWC Response to ORA Data Request AL7-014. This is the same spreadsheet submitted as part of Great Oaks' responses to ORA Data Request AL7-003, but with the questions noted in Column N and responses to the questions in Data Request AL7-014 provided in column O of the spreadsheet.

b. In this spreadsheet in column G titled "GOWC Funded," for each project that GOWC answered "No-Expensed" please indicate which expense account(s) each project is recorded in.

Response: See document attached and labeled GOWC Response to ORA Data Request AL7-014. This is the same spreadsheet submitted as part of Great Oaks' responses to ORA Data Request AL7-003, but with the questions noted in Column N and responses to the questions in Data Request AL7-014 provided in column O of the spreadsheet.

c. In this spreadsheet in column K titled "Current Project Status," for each project that GOWC answered "completed" please explain why there is a balance remaining in GOWC's CWIP as of 6/30/2015 if the project had been completed.

Response: The account (CWIP) is not closed out until December 31 of each year.

d. In this spreadsheet in column F titled "Developer Deposits Payable," for each project that has a balance indicate whether each amount was an advance or a contribution by the developer and the year this amount was recorded in.

Response: See document attached and labeled GOWC Response to ORA Data Request AL7-014. This is the same spreadsheet submitted as part of Great Oaks' responses to ORA Data Request AL7-003, but with the questions noted in Column N and responses to the questions in Data Request AL7-014 provided in column O of the spreadsheet.

e. Please provide background for the project "11-349 – GOW vs SCVWD-SV Law Group," and explain why it warrants being in CWIP instead of an expensed item.

Response: Charging expenses during the course of the year to this account provides the ability to quickly and easily determine total expense over periods of time. The calendar-year balance for this item is expensed every year to account 502.798 – Outside Services – Legal.

## VERIFICATION

I, Ron Ceolla, am Chief Financial Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-014 and know the contents thereof. I certify that the Responses to Data Request AL7-014 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 16, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



# GREAT OAKS WATER COMPANY

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September 14, 2015

***Via email to:***

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Lisa Bilar, Program and Project Supervisor  
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Shanna Foley, Attorney for ORA  
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Alex Lau, Utilities Engineer  
[alex.lau@cpuc.ca.gov](mailto:alex.lau@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request AL7-015**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-015 pursuant to the instructions in the originating email containing the Data Request. For those responses for which Confidential Treatment is requested, the request is provided as part of the response.

Responses to Data Requests

1. In PDF format, on a system map identify each Pressure Zone within GOWC’s water system and indicate the approximate pressure (psi) in each Pressure Zone.

Response: Attached and labeled GOWC Response to ORA Data Request AL7-015(1) is a map of GOWC's pressure zones. Zone 1 is the blue area extending from the far northwest to the far southeast into and throughout Coyote Valley. Zone 4 covers the Almaden Valley service area and would technically be broken into smaller pressure zones, but only by PRVs as the water descends from the tank into the valley. The pressures of

zones can not be expressed in psi. The pressures are dependant on elevation and vary throughout the zone. The Hydraulic Grade Line of Zone 1 is approximately 340 feet AMSL. The HGL of Zone 2, shown in red, is approximately 400 feet AMSL. The HGL of Zone 3 is approximately 425 feet AMSL. The HGL of Zone 4 is approximately 1145 feet AMSL. In Zone 4, after 3 PRVs, the HGL is approximately 600 feet AMSL for most of the valley bottom.

**VERIFICATION**

I, John Roeder, am Chief Executive Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-015 and know the contents thereof. I certify that the Responses to Data Request AL7-015 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 11, 2015.

\_\_\_\_\_  
/s/  
John Roeder



# GREAT OAKS WATER COMPANY

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October 14, 2015

***Via email to:***

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Alex Lau, Utilities Engineer  
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**RE: Great Oaks Water Company Responses to ORA Data Request AL7-015**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request AL7-015 pursuant to the instructions in the originating email containing the Data Request. For those responses for which Confidential Treatment is requested, the request is provided as part of the response.

Responses to Data Requests

1. Please list all attempts, actions (such as letting the well rest) and results that GOWC has attempted in the past 5 years to increase the yield of Well 22.

Response: 1. Great Oaks has back-washed the well with pressurized water repeatedly. The pump was able to remove a considerable amount of dirt and silt, however the flow rate was increased only slightly. The increase in flow rate was temporary and the well's flow

capacity quickly returned to the pre-washed performance. 2. Great Oaks removed the pump and performed a redevelopment with a pump rig and large air compressor. Dirt and silt was removed, resulting in a small, but temporary increase in flow rate. 3. Great Oaks has requested that the Santa Clara Valley Water District (District) increase groundwater recharge, but the District has held water in reservoirs or used that water for its treated water plants instead of recharging groundwater. 4. Great Oaks shut down Well 22 because the large pump was too inefficient when running at a low flow rate. After many months, Great Oaks installed a smaller pump and the flow rate increased for an extended period, but eventually slowed to the lowest flow rate at which it has operated. 5. Great Oaks spoke with several drillers, pump companies, hydrologists, engineers and nearby well owners about the problem with Well 22. The common advice was to drill another well in a location to the northeast.

2. During ORA's site visit on August 4th, 2015, Great Oaks' CEO stated that inflatable packing could be used to seal the top section of the casing perforation of Well 23 since there are multiple sections of perforation that the well can still draw water from.

a. Please state whether GOWC has attempted the action described in question 2 and if so, provide a summary of the results.

Response: No.

b. Please list any additional alternatives that GOWC could use to remedy the issue of GOWC's wells drawing air.

Response: 1. Increasing the discharge pressure by adjusting the flow control valve will slow the flow rate and prevent drawing air. 2. Smaller pumps can be installed to pump less water which will prevent drawing air. 3. Using a well less often will help maintain a higher groundwater level that will help to prevent air. 4. Increasing the groundwater level by allowing recharging of the groundwater will help to prevent air. 5. Reducing water use will reduce pumping which will help keep groundwater levels higher and prevent drawing air. 6. The installation of packers inside of a well can prevent air by blocking shallower perforations. 7. Performing well-to-aquifer reinjection can raise groundwater levels that will help prevent the drawing of air. 8. Well redevelopment can allow less restricted flow into the well casing which will maintain higher pumping water levels that will help to prevent air. 9. Abandon the well that draws air and drill another well.

c. Has GOWC used any of the repairs listed its response to question 2.b in the past? If so, please give a description and summary of the results of these attempted repairs.

Response: Great Oaks has used alternatives 1, 2, 3, 5, 8, and 9. Alternative 1 has been used effectively on many wells in the past and is currently being used on Wells 21, 22, 23, and 24. Alternative 2 was used effectively on Wells 5, 7, 9, 19, 22, 23, and 24. Alternative 3 was used on Wells 1, 4, 5, 16, 19, and 22. Great Oaks has been using Alternative 5 which has been marginally successful. Alternative 8 has been used somewhat successfully on Wells 3, 22, 23, and 24. Alternative 9 was used on Well 5.

### VERIFICATION

I, John Roeder, am Chief Executive Officer of the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request AL7-016 and know the contents thereof. I certify that the Responses to Data Request AL7-016 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at Dallas, Texas on October 14, 2015.

\_\_\_\_\_  
/s/  
John Roeder



# GREAT OAKS WATER COMPANY

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September 4, 2015

***Via email to:***

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Shanna Foley, Attorney for ORA  
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**RE: Great Oaks Water Company Responses to ORA Data Request LWA-001**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request LWA-001.

Pursuant to the instructions provided in Michael Conklin’s August 26, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA’s originating DR email. ORA granted an extension to Great Oaks, making responses due on or before September 4, 2015.

Responses to Data Requests

- 1) Follow-up to Data Request MC8-006, question 2.h.

GOWC’s August 10, 2015 response to ORA Data Request MC8-006, question 2.h., referenced Decision 05-05-015, Resolution W-4973 and Resolution W-5047. These referenced documents appear to show that the LICAP has been amortized several times with Commission authorization. However, the referenced documents do not appear to show supporting documentation that the employee salaries and benefits covered in the overhead allocation for this account are not otherwise included in rates.

Please provide a supplemental response to ORA Data Request MC8-006, question 2.h. providing all available supporting documentation. The question is:

2. For the “Low Income Lost Revenue Account”:

h. Provide supporting documentation to show that the employee(s) salaries and benefits covered in the overhead allocation for this account are not otherwise included in rates.

Response: Objection. The question has been asked and answered. In addition, the data request is argumentative. Without waiving this objection, see GOWC Response to ORA Data Request MC8-006. The question of whether the overhead allocation included in the “Low Income Lost Revenue Account” is appropriate (i.e., “not otherwise included in rates”) has been answered by the Commission on multiple occasions. See, for example, Resolution W-4973, issued February 27, 2014, which approved Great Oaks Advice Letter 234-W, in which the Commission stated:

In Res. W-4594 the Commission authorized Great Oaks to give a 50% reduction in the bimonthly service charge to low income customers and establish a memorandum account to track expenses and the rebate provided under this program. Initially the authorized expenses were calculated as “2 hours/year/customer at \$60/hour which provided \$120 per year per customer (\$10 per month per customer). D.11-05-020 provided for Low Income Data Sharing between regulated energy and water utilities; having access to Pacific Gas & Electric Company’s (PG&E) listing of pre-approved low-income customers within its service territory greatly reduced Great Oaks expense for manually processing and reviewing applications. Accordingly, beginning in September 2012, Great Oaks reduced the overhead expense to \$1.95 per month per customer.<sup>1</sup>

Later in Res. W-4973, the Commission made note of these facts:

1. “No protests were received to AL 234-W.”<sup>2</sup>
2. “DWA has reviewed all of the amounts requested for recovery by Great Oaks in each of the memorandum and balancing accounts and recommends that Great Oaks should be allowed to recover these amounts.”<sup>3</sup>

Then, in its Discussion of the Low Income Lost Revenue Memorandum Account, the Commission stated:

Great Oaks reported an overhead expense of \$77,453 and lost revenue of \$124,221, for a total program cost of \$201,854 for the period January 2012 through August 2013. In response to a data request, Great Oaks provided DWA a monthly breakdown of the number of customers participating in its

<sup>1</sup> Resolution W-4973, page 3.

<sup>2</sup> *Id.*, page 4. Note: ORA did not protest Great Oaks Advice Letter 234-W.

<sup>3</sup> *Id.*

Low Income Customer Assistance Program. DWA used this information to independently verify the overhead and lost revenue for the program.<sup>4</sup>

The Commission included the following in its Findings and Conclusions:

11. Great Oaks provided documentation that the only costs it booked in the three memorandum and five balancing accounts are costs directly authorized by the Commission.
12. DWA finds that Great Oaks acted prudently when it incurred costs booked to the three Memorandum and five Balancing Accounts.
13. DWA finds that the costs booked in the three Memorandum and five Balancing account are reasonable.
14. The costs requested in the three Memorandum and five Balancing accounts are not covered by other authorized rates.
15. As a matter of policy, it is appropriate for ratepayers to pay for services directly related to audits and low income programs authorized by the Commission.
- ...
18. This Resolution concerns an uncontested matter that grants the relief requested.<sup>5</sup>

Great Oaks believes that the Commission's own findings and conclusions on this issue are dispositive and support the inclusion of overhead expenses in the Low Income Lost Revenue Memorandum Account and the surcharge requested in A.1507001.

2) Follow-up to ORA Data Request MC8-006, question 2.j.

In response to ORA Data Request MC8-006, question 2.j., GOWC provided the spreadsheet titled "GOWC Response to ORA Data Request MC8-006 (2.j.).xlsx." On tab "06-27-2015" of that spreadsheet there are two line items labeled '[REDACTED]',

- a. GOWC's Tariff Rule 22 states that the LICAP program is for residential customers. Is this still the case?

**Response:** Yes. In addition to its commercial and fire protection accounts, [REDACTED] has a residential account providing water service to residential customers residing at the service address.

<sup>4</sup> *Id.*, page 5.

<sup>5</sup> *Id.*, page 7 (emphasis added). Note: ORA did not contest Great Oaks Advice Letter 234-W.

b. How long has [REDACTED] been receiving LICAP rebates?

Response: Varying periods of time.

c. Provide all annual renewal documentation since the date [REDACTED] has been receiving LICAP rebates.

Response: Upon information and belief, [REDACTED] was renewed in the program through the PG&E data exchange.<sup>6</sup>

d. Provide the total LICAP rebate dollar amount provided to [REDACTED]

Response: See GOWC Response to ORA Data Request MC8-006(2.j.) for the pertinent information. To the extent the data request is seeking information that was outside the scope of ORA Data Request MC8-006(2.j.), Great Oaks objects, as the data request is vague and ambiguous, not being limited to any particular period of time. Without waiving this objection, Great Oaks states that its advice letters requesting amortization of the balance in the associated memorandum accounts includes the requested information.

e. Please provide a listing of all customers receiving LICAP rebates that are not residential customers.

Response: Great Oaks believes that all customer receiving LICAP rebates are residential customers qualified to receive those rebates.

f. Does GOWC routinely check whether customers are residential customers during the annual renewal process?

Response: It is difficult to characterize anything related to customer service as "routine," since each customer makes individual demands upon customer service or otherwise requires individualized attention. Generally, however, when a customer enrolls in LICAP or has LICAP participation renewed, either in-person or through the Commission-directed data exchange process, residential customer status is checked.

3) Follow-up to Data Request MC8-006, question 2.n.

In response to ORA Data Request MC8-006, question 2.n., GOWC stated that surcharge revenues are booked to the income account for all metered sales and that GOWC tracks the LICAP surcharge revenues in the spreadsheet previously provided in response to ORA Data Request MC8-001. ORA looked at the spreadsheet titled "GOWC Response to ORA Data Request MC8-001" in the tabs "1-A-1" and "2-A-12" and found amounts authorized

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<sup>6</sup> Great Oaks' employee responsible for the PG&E data exchange is out of the office for personal health reasons. Upon his return, if other or different information is available, Great Oaks will provide a supplemental response to this data request.

to be recovered through LICAP surcharges (rather than actual amounts recovered through LICAP surcharges).

- a. Please provide the general ledger (transaction detail) entries supporting the recorded surcharge revenues associated with the LICAP Program. If GOWC has already provided this information to ORA, please identify which data request response it was provided in as well as the spreadsheet name, tab, and cell where the information can be found.

Response: The information on surcharge revenues was provided to ORA with GOWC Response to ORA Data Request MC8-001. See tab 2-A-13 RC, column C (“Billings”) and tab 2-A-22 RC, column C (“Billings”).

- b. If general ledger (transaction detail) entries in response to part “a.” of this question are not available, provide documentation identifying the surcharge revenues annually since 2009, by year associated with the LICAP.

Response: See response to question 3)a., above. See also GOWC Response to ORA Data Request LWA-001(9.d.1.) through (9.d.5.).

- c. Provide a reconciliation showing the difference between the actual LICAP surcharge revenues and the authorized LICAP surcharge revenues for each year since 2009.

Response: See responses to numbers 3)a. and 3)b., above.

- d. In what account is the actual LICAP surcharge revenues tracked against the authorized LICAP surcharge revenues?

Response: See response to number 3)a., above.

- 4) Follow-up to Data Request MC8-006, question 2.q.i.

ORA’s Data Request MC8-006, question 2.q.i. pertains to the proposed LICAP surcharge used to fund the program during Test Year 2016/2017. GOWC’s August 10, 2015 response states that the LICAP provides a discount on meter service charges, not on quantity charges. To clarify ORA’s question, ORA is asking about the surcharge used to fund the program, not the credit provided to qualifying customers. With that clarification, please provide a response to ORA’s Data Request MC8-006, question 2.q.i. The question is:

2.q. Exhibit D, Chapter 6, Section B, p. 3 states in the proposed language for the LICAP surcharge that the proposed surcharge will be added to the quantity rate for all water delivered, rather than on only the water delivered to non-LICAP participants.

- i. Why does Great Oaks propose that LICAP participants and non-participants all pay the LICAP surcharge?

Response: Objection. The question has been asked and answered. The question is also argumentative. Without waiving these objections, Great Oaks states that its request is consistent with Commission practice. See, e.g., Resolution W-4973 (quoted above) and Resolution W-5047.

- 5) Follow-up to Data Request MC8-006, question 2.r.

In GOWC's August 10, 2015 response to ORA's Data Request MC8-006, question 2.r., GOWC stated that it is premature to perform the requested calculation for the LICAP surcharge. However, the requested calculation for the LICAP surcharge is necessary in order to estimate the effect on bills in the Test Year for customers who qualify for the LICAP program and customers who have to pay for the LICAP program but do not qualify themselves. Given the recent fluctuations in enrollment in the LICAP program, it is necessary to know GOWC's projected enrollment in the LICAP program during the Test Year.

- a. Please calculate, to the extent possible, GOWC's projected LICAP surcharge and surcredit per ORA's question Data Request MC8-006, question 2.r. which states: "Exhibit D, Chapter 6, section B, p. 4 states that the LICAP surcharge is based on projected credits and charges and projected water sales and will be calculated upon final determination of Test Year meter service charges using current LICAP customer numbers. Please provide this calculation."

Response: Objection. The data request is vague and ambiguous. Great Oaks has requested the establishment of a LICAP surcharge. The data request refers to both a surcharge and a surcredit. Great Oaks does not understand what ORA means when it refers to a surcredit, as none was requested and none is under consideration. Without waiving this objection, Great Oaks responds as follows:

If it is assumed that rates as reflected in A1507001 Updated and Corrected GRC Workpapers, August 17, 2015, are adopted, that LICAP customers have 3/4" meters, that water sales as projected are adopted, and that there are 2,190 LICAP customers in the program (based upon the March 2015 data exchange figures), Great Oaks estimates an annual surcharge on all water delivered will be \$0.0496/ccf, which is calculated as follows:

2,190 X \$6.27 (LICAP Discount) X 12 months =	\$164,775.60
2,190 X \$1.95 (Overhead) X 12 months =	<u>\$ 51,246.00</u>
Total	\$216,021.60
Divided by Projected Water Sales (4,358,930 ccf) =	\$0.496/ccf

- b. Please identify GOWC's projected LICAP enrollment for the Test Year 2016/2017.

Response: 2,190

- 6) Follow-up to Data Request MC8-006, question 2.j.
- a. Please provide a copy of the 6/23/2014 bill for account number 688-176-3.

Response: See document attached and labeled GOWC Response to ORA Data Request LWA-001(6.a.). Great Oaks has redacted personal customer information.

- b. Please provide a copy of the 6/27/2014 bill for account number 016-464-5.

Response: See document attached and labeled GOWC Response to ORA Data Request LWA-001(6.b.). Great Oaks has redacted personal customer information.

- c. Please provide a copy of the most recent annual renewal in the LICAP program for account number 688-176-3 and account number 016-464-5.

Response: Account 688-176-3 was automatically renewed through PG&E data exchange. Account 016-464-5 did not renew participation in LICAP.

- 7) Follow-up to Data Request MC8-006, question 5.iv.
- a. ORA Data Request MC8-006 Question 5.iv. stated “Has GOWC spent money on replacement or remediation due to the 2003 MTBE contamination?” GOWC did not provide a response to the question. ORA assumes GOWC meant to refer to the response that states “See Great Oaks Advice Letter 228-W-A.” Please confirm that this is correct.

Response: Objection. The data request is argumentative. Without waiving this objection, Great Oaks states that it did respond to questions 5.iv and 5.v. with the same response, referring ORA to Great Oaks Advice Letter 228-W-A, which specifically addresses the issue of spending money on replacement or remediation due to the 2003 MTBE contamination. No money has been spent on replacement or remediation due to the 2003 MTBE contamination as of this date. If money had been spent, Great Oaks would have sought pre-approval, as stated in Advice Letter 228-W-A.

- 8) Follow-up to Data Request MC8-006, question 5.v.

ORA Data Request MC8-006 question 5.v. stated: “Does GOWC anticipate replacement or remediation needs due to the 2003 MTBE contamination?” GOWC’s response stated: “See Great Oaks Advice Letter 228-W-A.” Upon reading Advice Letter 228-W-A, dated September 7, 2012, ORA has two follow-up questions:

- a. GOWC Advice Letter 228-W-A states “Great Oaks did not request replacement plant funded by ratepayers due to the MTBE release. No replacement plant has been included in rate base as a result of the MTBE release.” Is this statement still applicable?

Response: Yes.

- b. GOWC Advice Letter 228-W-A does not appear to address GOWC's current anticipated replacement or remediation needs due to the 2003 MTBE contamination. Please state GOWC's anticipated replacement or remediation needs due to the 2003 MTBE contamination. If GOWC's response refers to Advice Letter 228-W-A, please identify the specific language in that advice letter that encompasses GOWC's anticipated replacement or remediation needs due to the 2003 MTBE contamination.

Response: Replacement or remediation needs due to the 2003 MTBE contamination are presently unknown. See Advice Letter 228-W-A.

- 9) Follow-up to Data Request MC8-006, question 6.a.i. and 6.b.

GOWC's August 10, 2015 response to ORA's Data Request question 6.a.i. states: "When an amount in the Monterey-style Water Revenue Adjustment Mechanism account is amortized through a surcharge, the balance is recorded in a balancing account where amounts collected are recorded."

- a. Please identify which balancing account these amounts are collected and recorded?

Response: On the spreadsheet provided as GOWC Response to ORA Data Request MC8-001(1), on the first page, there are three (3) accounts shown with these descriptions: "M-WRAM - Recover: 5/9/11 to 2/11/12 - Surcharge: 5/13/12 to 5/12/13," "M-WRAM - Recover: 4/16/12 to 1/7/13 - Surcharge: 1/15/13 to 1/14/14," and "M-WRAM - Recover: 1/10/13 to 8/8/14 - Surcharge: 9/2/14 to 9/1/15." If ORA were to examine the spreadsheet pages associated with these described accounts (respectively, pages WP 2-A-11 RC, WP 2-A-19 RC, and WP 2-A-25 RC), ORA would see the balancing accounts where the M-WRAM authorized surcharges collected are recorded.

- b. Please provide the monthly entries to that balancing account since the first M-WRAM surcharge was authorized.

Response: See response to question 9)a., above.

- c. In ORA's data request MC8-006, question 6.b., ORA seeks supporting documentation for recorded surcharge revenue for M-WRAM surcharges. Recorded surcharge revenue appears to be presented in the "billings" column in GOWC's spreadsheet provided in response to MC006-001 titled "GOWC Response to MC8-001" in the tabs "2-A-11 RC," "2-A-19 RC," and "2-A-25 RC." Please confirm that this is correct.

Response: Yes, that is correct.

- d. ORA looked at the advice letters 223-W, 229-W-A and 242-W referenced in Great Oaks' August 10, 2015 response to MC8-006, question 6.b., and acknowledges that these advice letters approved surcharges to recover balances in the M-WRAM account. In MC8-006, question 6.b., ORA seeks supporting documentation for the surcharge revenues resulting from those approved advice letters. With this understanding please provide a supplement to your response. The question is:

6.b. For this authorized M-WRAM surcharge as well as the two other M-WRAM surcharges listed for the time periods (5/9/11 – 2/11/12) and (4/16/12 – 1/7/13), provide all supporting documentation for the hard-coded data in the “billings” column.

Response: See documents attached and labeled GOWC Response to ORA Data Request LWA-001(9.d.1) through (9.d.5), which show revenues billed during the time from 2011 through part of 2015. Great Oaks directs ORA to the column headings describing various surcharges billed. The data on the spreadsheets provided as GOWC Response to ORA Data Request LWA-001(9.d.1) through (9.d.5) is entered (i.e., “hard-coded”) by Great Oaks' Chief Financial Officer from data compiled by Great Oaks' computer billing system. The data from the billing system is far too voluminous to produce.

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: September 4, 2015

\_\_\_\_\_/s/  
 Timothy S. Guster  
 Vice President and General Counsel  
 Legal and Regulatory Affairs  
 Great Oaks Water Company  
 PO Box 23490  
 San Jose, CA 95153  
 Telephone: (408) 227-9540  
 Facsimile: (408) 227-7126  
 Email: tguster@greatoakswater.com

**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request LWA-001 and know the contents thereof. I certify that the Responses to Data Request LWA-001 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 4, 2015.

\_\_\_\_\_  
/S/  
Timothy S. Guster

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request LWA-001 and know the contents thereof. I certify that the Responses to Data Request LWA-001, numbers 2-6 and 9, are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 4, 2015.

\_\_\_\_\_  
/S/  
Ron Ceolla



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

September 17, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request LWA-002**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request LWA-002.

Pursuant to the instructions provided in Michael Conklin’s September 10, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA’s originating DR email.

Responses to Data Requests

1) Please provide a copy of the invoices from PG&E that were for June 2013 but were not included in the original balances requested for recovery in AL 234-W.

Response: See documents attached and labeled GOWC Response to ORA Data Request LWA-002(1). The documents include all PG&E bills for any portion of June 2013. Great Oaks will continue to search its archived paper records for this information and will supplement this response with any new or different information.

2) Is the account referred to on p. 8 of Application 15-07-001 titled “AL 225-W-A Audit Cost Balancing Account” the same account as the “Certified Public Accountant Audit Cost Memorandum Account” in Preliminary Statement L?

Response: No.

3) Is the account referred to on p. 8 of Application 15-07-001 titled “AL 236-W Recovery of GRC Rehearing Settlement” the same account as the “A.09-09-001 Limited Rehearing Under-Collection Balancing Account” in Preliminary Statement Q?

Response: Yes.

4) In the tab ‘2-A-1 RC’ of the file “GOWC Response to MC8-001.xls,” please provide all supporting documentation for the recorded power (Kwh) for June 2014 shown in column “C”, Row 91.

Response: See documents attached and labeled GOWC Response to ORA Data Request LWA-002(4) through LWA-002(4) Part 7. The documents provided are all PG&E bills for any portion of June 2014.

5) In the tab ‘2-A-1 RC’ of the file “GOWC Response to MC8-001.xls,” please provide all supporting documentation for the “Incremental Expense Rate Change (\$/Kwh)” for June 2014 shown in Column “D”, Row 91.

Response: See documents produced in response to ORA Data Request LWA-002(4). Note that the values in Column D are based upon a formula as shown on the spreadsheet.

6) Exhibit I p. 3 references an agreement between Great Oaks and the City of San Jose.

a. Please provide a copy of the agreement.

Response: Great Oaks requests CONFIDENTIAL TREATMENT of the document attached and labeled GOWC Response to ORA Data Request LWA-002(6).

b. Did GOWC receive Commission review and approval of the agreement? If so, please provide a reference where this can be found and if not please explain why not.

Response: No. No Commission review and approval was necessary.

7) Exhibit I p. 4 states: “[r]ecently, the City of San Jose has engaged in activities that may give rise to additional service duplication claims. Discussions with the City are expected to continue, but litigation to finally resolve the claims appears more likely now than at any time in recent years.”

a. Please detail all activities the City of San Jose has engaged in GOWC referenced in the above statement.

Response: Objection. The data request seeks information that is protected from disclosure by the attorney/client privilege and the attorney work product doctrine. Without waiving this objection, Great Oaks states that the activities of the City of San Jose referenced above are of the character that gives rise to liability under California Public Utilities Code §§1501- 1507.

b. Are the additional service duplication claims referenced in the statement above the same or different than those discussed in D.10-11-034?

Response: Different.

8) Ordering Paragraph 5 from Decision 10-12-057 states “Great Oaks Water Company must engage an independent Certified Public Accountant, with utility client experience, to perform a full and complete audit of the company beginning with all transactions as of January 1, 2009. Great Oaks Water Company must continue to have annual audits unless this requirement is rescinded by a future Commission decision.”

a. What is the most recent year Great Oaks Water Company engaged an independent CPA to perform an annual audit?

Response: 2012.

9) Exhibit 3-4 of Application 15-07-001 provides the Audited Balance Sheets and Financial Statements for 2012. Pages 3-5 of Exhibit 3-4 contain the statement “See independent auditors’ report and notes to consolidated financial statements.” Please provide the independent auditors’ report and notes to consolidated financial statements.

Response: See document attached and labeled GOWC Response to ORA Data Request LWA-002(9).

10) Bonus Depreciation:

a. Does any of the business property Great Oaks placed in service after September 8, 2010 through December 31, 2014 qualify for bonus depreciation under Section 168(k) of the IRC?

Response: Great Oaks has requested information on this data request from its tax preparer and will provide a supplemental response as soon as possible.

b. If the answer to part (a) is yes, please provide a list of each item that qualifies. If the answer to part (a) is no, please explain why not.

Response: See answer to subpart a., above.

c. Please provide a list of each of GOWC’s requested plant additions in the current GRC that qualifies for bonus depreciation under Section 168(k).

Response: See answer to subpart a., above.

d. For each plant addition in GOWC’s response to part (c), please provide a workpaper reference including the file name, tab and row and column from GOWC’s GRC workpapers to show the bonus depreciation applied.

Response: See answer to subpart a., above.

11) Please provide a copy of the most recent version of GOWC’s Preliminary Statement J regarding the Monterey-Style Water Revenue Adjustment Mechanism.

Response: See document attached and labeled GOWC Response to ORA Data Request LWA-002(11).

12) Please provide an example copy of an actual residential customer bill from each billing cycle for July 2013 and August 2013.

Response: See documents attached and labeled GOWC Response to ORA Data Request LWA-002(12). Personal customer information has been redacted.

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: September 17, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
Timothy S. Guster  
Vice President and General Counsel  
Legal and Regulatory Affairs  
Great Oaks Water Company  
PO Box 23490  
San Jose, CA 95153  
Telephone: (408) 227-9540  
Facsimile: (408) 227-7126  
Email: tguster@greatoakswater.com

**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request LWA-002 and know the contents thereof. I certify that the Responses to Data Request LWA-002 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 17, 2015.

\_\_\_\_\_  
/s/  
Timothy S. Guster

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request LWA-002 and know the contents thereof. I certify that the Responses to Data Request LWA-002 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 17, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

October 7, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
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Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request LWA-003**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request LWA-003.

Pursuant to the instructions provided in Michael Conklin’s September 10, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA’s originating DR email.

Responses to Data Requests

1) GOWC in response to ORA data request MC8-006, Question 2.j. provided a spreadsheet showing billing system entries supporting LICAP lost revenue amount for June 2014. Please supplement that response with the following additional data for each billing entry (additional columns in same spreadsheet):

a. Meter size on record at the time.

Response: See document attached and labeled GOWC Response to ORA Data Request LWA-003(1). Meter size code is shown in column G of each tab. Use the following chart for meter size codes.

Code	Size (inches)
0	5/8 x 3/4
1	3/4
2	1
3	1.5
4	2
5	3
6	4
7	6
8	8
9	10

b. Customer class on record at the time.

Response: See document attached and labeled GOWC Response to ORA Data Request LWA-003(1). See column H of each tab for customer class. Use the following chart for customer class codes.

Code	Class
0	SFR
1	Business
2	Industry
3	Pub. Auth.
4	Priv. Irr.
5	MFR
6	Schools

c. Monthly service charge before LICAP discount at the time (bi-monthly service charge before LICAP discount is also acceptable but should be so noted).

Response: See table below for monthly service charges in effect during June 2014.

Meter Size (inches)	Charge
5/8	\$9.64
3/4	\$14.47
1	\$24.11
1.5	\$48.22
2	\$77.15
3	\$144.66
4	\$241.10
6	\$482.21
8	\$771.53
10	\$1,591.28
12	\$2,169.00

d. Any additional information necessary if the recorded discount is not equal to 50% of the service charge applicable the stated meter size.

Response: The recorded discounts are equal to 50% of the applicable service charge. In some instances, the amount is adjusted pursuant to Tariff Rule 9 (Section A.1.c.(1)). In the event a meter is replaced during a billing period with a meter of a different size, the recorded discount would be pro-rated accordingly.

2) GOWC in response to ORA data request MC8-006, Question 2.j. provided a spreadsheet showing billing system entries supporting LICAP lost revenue amount for June 2014. Please provide the same type of information as provided in that response and supplemented as specified in Question 1 above for May 2014.

Response: See document attached and labeled GOWC Response to ORA Data Request LWA-003(1).

3) Please provide all documents received from 2013 through 2015 to date from PG&E that contains the low-income customer data that GOWC used to identify/confirm its LICAP customers' eligibility.

Response: The documents received from PG&E from 2013 through 2015 containing low-income customer data used by Great Oaks to identify/confirm its LICAP customers' eligibility are attached and labeled as follows:

1. GOWC Response to ORA Data Request LWA-003(3) March 2013;
2. GOWC Response to ORA Data Request LWA-003(3) Sept 2013;
3. GOWC Response to ORA Data Request LWA-003(3) March 2014;
4. GOWC Response to ORA Data Request LWA-003(3) Sept 2014;
5. GOWC Response to ORA Data Request LWA-003(3) March 2015; and
6. GOWC Response to ORA Data Request LWA-003(3) Sept 2015.

4) GOWC's Rule No. 22, Section B Certification states:

Application for the LICAP will consist of completing an application as provided by the Company and will require the providing of a copy of a current PG&E bill showing eligibility for the CARE program. Certification will apply for 12 months. At the end of the 12-month period, reapplication meeting the same requirements of the original application will be required.

a. Is the description of GOWC's LICAP certification process shown above still accurate? If not, please explain now it is no longer accurate and provide a more accurate description of GOWC's certification process.

Response: This is still accurate for customers who apply directly to Great Oaks for the LICAP discount. See Commission Decision 11-05-020 for information on how customers may qualify through data sharing.

b. Are all current GOWC's LICAP customers listed in the latest low-income customer data exchange (CARE list) from PG&E?

Response: Yes.

c. If the answer to Question 4.b is no, please provide a list of LICAP customer accounts, with customer name and account number, that are not included in the PG&E's CARE list.

Response: No answer required.

d. For LICAP customer accounts provided in response to Question 4.c above (i.e., eligibility not based on data shared by PG&E), describe the process that GOWC undertook to establish the customers' LICAP eligibility at the time they applied and on a renewal basis. Include all relevant documentation to illustrate GOWC's description.

Response: No answer required.

### VERIFICATION

I, James Mashburn, am Director of Technology for Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request LWA-003 and know the contents thereof. I certify that the Responses to Data Request LWA-003 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on October 7, 2015.

\_\_\_\_\_  
/S/  
James Mashburn



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

July 14, 2015

*Via email to:*

Michael Conklin, ORA Project Coordinator  
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Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request MC8-001**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request MC8-001.

Pursuant to the instructions provided in Michael Conklin’s July 6, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA’s originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

Per the telephone conversation with Michael Conklin on July 9, 2015, Great Oaks is providing the requested memorandum and balancing account information as of December 31, 2014. Great Oaks will update this information as of June 30, 2015 on or before August 15, 2015, coinciding with Great Oaks’ next report to the Division of Water and Audits.

- 1) For each of Great Oaks’ memorandum and balancing accounts:
  - a) Provide the balance of each account as of 6/30/2015 in MS Excel format.

Response: See Excel spreadsheet attached hereto as GOWC Response to ORA Data Request MC8-001(1). Note that this spreadsheet is current through December 31, 2014. This response will be updated when data for the time period ending June 30, 2015 is compiled for Great Oaks' semi-annual report to the Division of Water and Audits on memorandum and balancing accounts.

- b) Identify the portions of each balance provided in response to question 1.a. that are residual uncollected portions of any previously authorized expired surcharges and the portions that have not yet been included in any surcharges (or surcredits).

Response: See response to Data Request 1.a., above.

- c) Provide each account's general ledger entries (in MS Excel format) which support the outstanding balances in the accounts as of 6/30/2015. The account's general ledger entries should include an itemized listing of all individual debits and credits made to the account.

Response: Memorandum and balancing account entries are not "general ledger entries." Only after a memorandum or balancing account is amortized and a surcharge is authorized are the surcharge revenues booked by Great Oaks considered "general ledger entries." See response to Data Request 1.a., above.

- 2) Has Great Oaks submitted a separate report or reports of balancing and/or memorandum account balances to the Commission's Division of Water and Audits?

Response: Yes.

- a) If so, please provide a copy of this report/each of these reports.

Response: See documents attached hereto as GOWC Response to ORA Data Request MC8-001(2). Note that this response is current through December 31, 2014. This response will be updated when data for the time period ending June 30, 2015 is compiled for Great Oaks' semi-annual report to the Division of Water and Audits on memorandum and balancing accounts.

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request MC8-001 and know the contents thereof. I certify that the Responses to Data Request MC8-001 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on July 14, 2015.

\_\_\_\_\_  
/s/

Ron Ceolla

**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request MC8-001 and know the contents thereof. I certify that the Responses to Data Request MC8-001 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on July 14, 2015.

\_\_\_\_\_  
/s/

Timothy S. Guster



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

July 17, 2015

*Via email to:*

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Supplemental Response to ORA Data Request MC8-001**

Great Oaks Water Company (Great Oaks) hereby provides its supplemental response to ORA Data Request MC8-001.

By email on July 15, 2015, Mr. Conklin requested a supplemental response to ORA Data Request MC8-001 with information on memorandum accounts authorized by the California Public Utilities Commission (Commission), but which were not listed in Great Oaks’ original response to Data Request MC8-001. In a follow-up telephone call, Great Oaks agreed to provide the names of any other Commission-authorized memorandum accounts, even if no entries had been made in such accounts and no balances exist in such accounts.

Supplemental Response to Data Requests

- 1) For each of Great Oaks’ memorandum and balancing accounts:
  - a) Provide the balance of each account as of 6/30/2015 in MS Excel format.

Response: In addition to the memorandum and balancing accounts listed on the Excel spreadsheet attached to GOWC Response to ORA Data Request MC8-001(1), the

following memorandum accounts have been authorized by the Commission. There are no entries and therefore no balances in any of these accounts at the present time.

- ◆ Military Family Relief Program (MFRP) Memorandum Account
- ◆ 2010 Tax Act Memorandum Account
- ◆ Employee Health Insurance Memorandum Account
- ◆ Debt Issuance Memorandum Account
- ◆ CDPH Chromium-6 Compliance Memorandum Account

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Supplemental Response to ORA Data Request MC8-001 and know the contents thereof. I certify that the Supplemental Response to Data Request MC8-001 is true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on July 17, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

July 28, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Partial Response to ORA Data Request MC8-002**

Great Oaks Water Company (Great Oaks) hereby provides its partial response to ORA Data Request MC8-002. Great Oaks will complete its response and submit its full response to ORA as quickly as possible.

Pursuant to the instructions provided in Michael Conklin's July 13, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

**General Objection to Data Request MC8-002**

**General Objection:** ORA Data Request MC8-002 contains many data requests, some with sub-parts, many of which are not relevant to Great Oaks' Application (A.) 15-07-001. As a result, many of the data requests contained in MC8-002 are not in compliance with Commission Rule 10.1, as they do not seek evidence relevant to A.15-07-001 and are not reasonably calculated to lead to the discovery of evidence admissible in the proceedings on A.15-07-001. In addition, many of the data requests in MC8-002 are repetitious of other data requests submitted by ORA. This establishes that MC8-002 is not carefully considered and is instead a generic data request submitted without regard to whether the information or evidence requested is relevant to the

pending Application. This “shotgun” approach to discovery is inappropriate and results in wasted time and effort for both Great Oaks and ORA. Without waiving this general objection, Great Oaks responds to ORA Data Request MC8-002 as follows:

Responses to ORA Data Request MC8-002

1. Please see the attached Excel spreadsheet containing ORA’s Supplemental Data Request (SDR). Please provide the information requested in the spreadsheet. For any response Great Oaks believes it has already provided in its GRC application, please provide the location of the information.

Response: See partial response provided on attached spreadsheet labeled GOWC Response to ORA Data Request MC8-002.

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: July 28, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
 Timothy S. Guster  
 Vice President and General Counsel  
 Legal and Regulatory Affairs  
 Great Oaks Water Company  
 PO Box 23490  
 San Jose, CA 95153  
 Telephone: (408) 227-9540  
 Facsimile: (408) 227-7126  
 Email: tguster@greatoakswater.com

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request MC8-002 and know the contents thereof. I certify that the Responses to Data Request MC8-002 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on July 28, 2015.

\_\_\_\_\_  
/S/  
Ron Ceolla

**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request MC8-002 and know the contents thereof. I certify that the Responses to Data Request MC8-002 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on July 28, 2015.

\_\_\_\_\_  
/S/  
Timothy S. Guster



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 28, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Supplemental Response to ORA Data Request MC8-002**

Great Oaks Water Company (Great Oaks) hereby provides its supplemental response to ORA Data Request MC8-002. Great Oaks will complete its response and submit its full response to ORA as quickly as possible.

Pursuant to the instructions provided in Michael Conklin’s July 13, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA’s originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

General Objection to Data Request MC8-002

General Objection: ORA Data Request MC8-002 contains many data requests, some with sub-parts, many of which are not relevant to Great Oaks’ Application (A.) 15-07-001. As a result, many of the data requests contained in MC8-002 are not in compliance with Commission Rule 10.1, as they do not seek evidence relevant to A.15-07-001 and are not reasonably calculated to lead to the discovery of evidence admissible in the proceedings on A.15-07-001. In addition, many of the data requests in MC8-002 are repetitious of other data requests submitted by ORA. This establishes that MC8-002 is not carefully considered and is instead a generic data request submitted without regard to whether the information or evidence requested is relevant to the

pending Application. This “shotgun” approach to discovery is inappropriate and results in wasted time and effort for both Great Oaks and ORA. Without waiving this general objection, Great Oaks responds to ORA Data Request MC8-002 as follows:

Supplemental Responses to ORA Data Request MC8-002

1. Please see the attached Excel spreadsheet containing ORA’s Supplemental Data Request (SDR). Please provide the information requested in the spreadsheet. For any response Great Oaks believes it has already provided in its GRC application, please provide the location of the information.

Response: See document attached and labeled GOWC Supplemental Response to ORA Data Request MC8-002.

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: August 28, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
 Timothy S. Guster  
 Vice President and General Counsel  
 Legal and Regulatory Affairs  
 Great Oaks Water Company  
 PO Box 23490  
 San Jose, CA 95153  
 Telephone: (408) 227-9540  
 Facsimile: (408) 227-7126  
 Email: tguster@greatoakswater.com

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request MC8-002 and know the contents thereof. I certify that the Responses to Data Request MC8-002 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 28, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla

**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request MC8-002 and know the contents thereof. I certify that the Responses to Data Request MC8-002 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 28, 2015.

\_\_\_\_\_  
/s/  
Timothy S. Guster



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

July 24, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Wenli Wei, Financial Examiner  
[wenli.wei@cpuc.ca.gov](mailto:wenli.wei@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request MC8-003**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request MC8-003.

Pursuant to the instructions provided in Michael Conklin’s July 17, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA’s originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. In its last GRC, Great Oaks requested and was approved to hire two new office staff members beginning in Test Year 2013/2014 (“staff members”). The recorded data submitted by Greak Oaks in this general rate case proceeding only shows one staff member being hired in 2013/2014.

- A. Please confirm that the recorded data submitted by Greak Oaks in this general rate case proceeding only shows one of the staff members being hired in 2013/2014.

Response: In D.13-05-020, the Commission approved the settlement agreement between Great Oaks and the Commission's Division of Ratepayer Advocates (DRA) (now known as the Office of Ratepayer Advocates, or ORA). Included within the settlement agreement was the addition of two new general office employees – an employee directly involved in the billing and rate system (Billing/Systems Manager) and employee to provide regulatory analysis and support, along with accounting and legal support for regulatory filings (Regulatory/Legal Specialist). Both positions have been filed. The title of the second position was changed, but the assigned duties were not.

In Exhibit E, GRC Workpapers, page WP-10a, Great Oaks acknowledges the entries that led to this data request. The workpapers show a position labeled "Regulatory/Legal Specialist" with no hire date and no projected payroll expenses. The workpapers also show a position labeled "Billing Systems/Senior Analyst" with payroll expenses beginning in 2014/2015. The position labeled "Billing Systems/Senior Analyst" is the title for the second new position that is the subject of this data request. Great Oaks will correct the workpapers to reflect only the Billing Systems/Senior Analyst position and link this with the new employee expenses authorized in D.13-05-020 when Great Oaks provided updates to its Application.

- B. If Greak Oaks did hire two staff members, please state where this is reflected in the recorded data submitted by Greak Oaks.

Response: See response to Data Request 1.A., above.

2. Has the additional staff member that is not reflected in Greak Oaks recorded data submitted in this general rate case, as discussed above, been hired as of July 1, 2015?

Response: Yes. See response to Data Request 1.A., above.

3. Refer to Exhibit E, tab "WP10- Employees and Salaries" and explain why the adopted TY 2013/2014 includes \$85,000 for a Regulatory/Legal Specialist position, yet that position was never filled. In addition, explain why this position is not forecasted to be filled.

Response: See response to Data Request 1.A., above.

4. Refer to Great Oak's workpapers, Exhibit E, tab "WP10- Employees and Salaries" and explain why a Billing/System Senior Analyst appears to be a new position beginning in 2014/2015.

Response: See response to Data Request 1.A., above.

5. Refer to Great Oak's workpapers, Exhibit E, tab "WP10- Employees and Salaries" For each TY 2016/2017 position, explain the formulas that Great Oaks used to calculate Projected 2014/2015 salaries.

Response: Great Oaks used actual salary expenses for the July 2014 through April 2015 time period and added estimated salaries for the next two months (May and June, 2015) together with any reported overtime. Great Oaks will be updating its expenses as permitted under D.07-05-062 to reflect more recent recorded data.

6. Refer to Great Oak's workpapers, Exhibit E, tab "WP10- Employees and Salaries" For each TY 2016/2017 position, explain how Great Oaks determined the labor inflation factors used.

Response: Projected 2015/2016 data is simply the 2014/2015 data escalated by the projected increase for each individual employee. New employees and promoted employees have hard-coded data, if known. Projected 2016/2017 data is provided using the same methodology. Projected 2017/2018 and 2018/2019 data is provided using the same methodology, except that escalation factors for those years that were available at the time of submission were utilized. Great Oaks will be updating its expenses as permitted under D.07-05-062 to reflect more recent recorded data and more recent escalation factors.

**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request MC8-003 and know the contents thereof. I certify that the Responses to Data Requests MC8-003 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on July 24, 2015.

\_\_\_\_\_  
/s/  
Timothy S. Guster

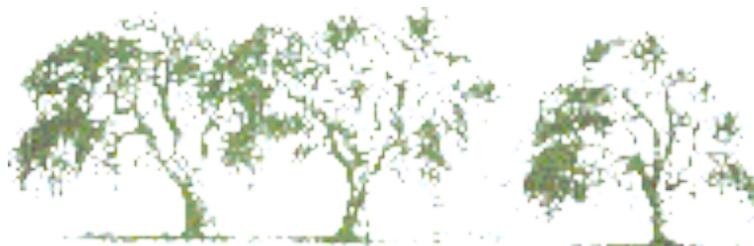
**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request MC8-003 and know the contents thereof. I certify that the Responses to Data Request MC8-003 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on July 24, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 4, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Wenli Wei, Financial Examiner  
[wenli.wei@cpuc.ca.gov](mailto:wenli.wei@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request MC8-004**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request MC8-004.

Pursuant to the instructions provided in Michael Conklin's July 24, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. Provide an Excel file with the weather data that was used by Ms. Wendy Illingworth in Exhibit D, Chapter 4 Water Sales Forecast Report to prepare Great Oaks' sales forecasts for the Test Year 2016/2017, Forecast Year ("FY") 2017/2018, and FY 2018/2019.

Response: See file transmitted with this response and labeled MC8-004 (1).

2. Provide an Excel file with the consumption data that was used by Ms. Wendy Illingworth in Exhibit D, Chapter 4 Water Sales Forecast Report to prepare Great Oaks' sales forecasts for the Test Year 2016/2017, FY 2017/2018, and FY 2018/2019.

Response: See file transmitted with this response and labeled MC8-004 (2) (3) (6). By way of further response, see tab labeled "Input Data." Additional tabs provide raw water sales data.

3. Refer to Great Oaks workpaper "WP11- Customers", cell J12 and explain why Great Oaks' methodology contains a hard-coded addition of 320 residential customers beginning in TY 2016/2017.

Response: The one large area being developed in Great Oaks' service area is expected to have an additional 320 residential customers beginning in TY 2015/2016. See Exhibit E, GRC Workpapers, page WP-11, Cell J24.

4. Refer to Great Oaks workpaper "WP11- Customers", and explain why, other than for Residential Customers, Great Oaks forecasted the number of customers using the last recorded 2013/2014 customer numbers instead of using a five-year average of the change in the number of customers by customer class.

Response: See note provided at the bottom of Exhibit E, GRC Workpapers, page WP-11. By way of further response, the number of customers in each category have been very stable over the years and all known new customers are included in the projections. Using a five-year average would not have produced more accurate projections.

5. Refer to Great Oaks workpaper "WP13-Services By Meter Size" and explain why approximately 8,700 meters were reclassified in 2014/2015 from the "5/8 x 3/4 inch" meter size to the "3/4" meter size despite the previously adopted amount of 20 total for "3/4" meter size.

Response: Meters were not "reclassified" as suggested, but instead were replaced according to a Commission-approved program. In its 2012 General Rate Case, Great Oaks proposed a meter testing and replacement program. The program included the installation of 10,450 5/8" x 3/4" meters over the life of the program. See excerpt from Great Oaks' 2012 Exhibit G Capital Projects Justifications attached as GOWC Response to ORA Data Request Mc8-004 (5). Great Oaks has been able to install the new lead-free meters at a faster rate than had been expected.

- 6. Refer to Exhibit D, Chapter 4 Water Sales Forecast Report, p. 6 and provide a copy of the alternative forecast described in the following passage: “Given the unusual pattern of consumption in recent years, the average of the last three years was used for the forecast, but the alternative forecast produced by the model is available if it would be preferred.”

Response: See attached spreadsheet labeled MC8-004 (2) (3) (6). The alternative forecast may be found starting on the page entitled “Input Data” at cell AA4.

**VERIFICATION**

I, Wendy Illingworth, have read Great Oaks Water Company’s Responses to ORA Data Request MC8-005, numbers 1, 2, and 6, and know the contents thereof. I certify that the Responses to Data Requests MC8-005, numbers 1, 2, and 6 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 4, 2015.

\_\_\_\_\_  
/S/  
Wendy Illingworth

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request MC8-004, numbers 3, 4, and 5, and know the contents thereof. I certify that the Responses to Data Request MC8-004, numbers 3, 4, and 5 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 4, 2015.

\_\_\_\_\_  
/S/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 3, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Wenli Wei, Financial Examiner  
[wenli.wei@cpuc.ca.gov](mailto:wenli.wei@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request MC8-005**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request MC8-005.

Pursuant to the instructions provided in Michael Conklin's July 27, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

- 1) ORA's review of GOWC Water Company's ("GOWC") website shows that customers can request their account information via GOWC's website.
  - a) Is GOWC's website request method the only way GOWC's customers can gain access to account information? If not, what other methods do GOWC's customers have available to them to gain access to account information.

Response: No. Customers may call Customer Service with any question regarding their accounts.

- b) What is the average response time for a GOWC customer who requests account information via GOWC's website?

Response: For requests received during normal business hours, responses are provided the same day, typically within one hour of receiving the request. For requests received after hours or on weekends, responses are provided the next business day.

- c) Are requests for account information handled directly by GOWC customer service staff? If not, who is responsible for handling these requests?

Response: Yes.

- d) Can GOWC's customers use GOWC's website for inquires other than account information? If so, what type of inquiries can be made?

Response: Customers may make any kind of inquiry by sending an email through the website or by calling Customer Service.

- 2) Provide the total number of GOWC customers that have thus far enrolled in the SurePay automated payment option through December 31, 2014.

Response: 4,485

- 3) Does GOWC currently provide SurePay enrollees, or any customers, the option to NOT receive a mailed paper bill for water service?

Response: No.

- a) If GOWC's answer to question 3 above is yes, what is number of customers as of December 31, 2014 that have opted to NOT receive a mailed paper bill?

Response: Not applicable.

- b) If GOWC's answer to question 3 above is no, explain why GOWC does not offer this option.

Response: Great Oaks does not have the infrastructure to provide this service.

- 4) Detail all the different methods that GOWC can accept payment for water service from its customers.

Response: Customers may pay for water service by mail (directly or through their banks), in person, or using the Sure Pay program. Great Oaks is in the process of

implementing credit/debit card payment options pursuant to the authority of Commission Resolution W-4979.

- 5) In Excel format, provide a table indicating the type and number of formal and informal complaints GOWC received from its customers for the following years: 2011/2012; 2012/2013; 2013/2014; and 2014/2015.

Response: See Exhibit D, Report on Results of Operations, Chapter 3, page 7.

- 6) List the daily hours that GOWC customer service representatives are available to GOWC's customers on: 1) a call-in basis, and 2) on a walk-in basis.

Response: Customer Service representatives are available Monday through Friday, from 8:00 a.m. to 5:00 p.m.

- 7) Describe GOWC's procedures for handling customer service needs that occur after the hours listed in response to question 5 above, such as a late-night service problem emergency.

Response: Great Oaks has an employee on-call to respond to after-hours service issues. When customers call Great Oaks' Customer Service after 5:00 p.m. on a weekday or anytime on a weekend, Great Oaks' answering service will get the customer information and provide it to Great Oaks' on-call employee for response.

- 8) In chronological order, detail GOWC's procedures from first late payment notice through water service disconnection (and collections), in the event one of GOWC's customers does not remit payment for water service.

Response: Great Oaks' billing statements provide that payment will be past due if not paid within 19 days of the billing date. If payment is not made on time, the customer receives a notice that payment was not timely received and requiring payment within 17 additional days to avoid service disconnection. If payment is not received within that additional time period, an urgent notice is delivered to the customer address by a Great Oaks employee (typically on a Thursday) advising that if payment is not made by the following Monday that water service will be disconnected. Customers may then make payment or payment arrangements at Great Oaks' office to avoid shut-off. If payment is not made, or arrangements for payment are not made, service is disconnected two days later (typically on Wednesdays).

- 9) Has GOWC ever performed a survey of its customers regarding its customer service or its water quality?

Response: No.

- a) If GOWC's answer to question 9 is yes, in PDF format provide copies of the most recent results of each survey.

Response: Not applicable.

b) If GOWC’s answer to question 9 is no, explain why not.

Response: Great Oaks does not have either Customer Service or water quality issues of sufficient magnitude to justify the expense of a survey. Customers may make inquiry or comment to any issue they desire to Customer Service.

**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request MC8-005 and know the contents thereof. I certify that the Responses to Data Requests MC8-005 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 3, 2015.

\_\_\_\_\_  
/s/  
Timothy S. Guster

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request MC8-005 and know the contents thereof. I certify that the Responses to Data Request MC8-005 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 3, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 10, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Wenli Wei, Financial Examiner  
[wenli.wei@cpuc.ca.gov](mailto:wenli.wei@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Supplemental Response to ORA Data Request MC8-005**

Great Oaks Water Company (Great Oaks) hereby provides its supplemental response to ORA Data Request MC8-005.

Pursuant to the instructions provided in Michael Conklin's July 27, 2015 email transmitting the Data Request, this supplemental response is being provided by email to those on ORA's originating DR email.

Supplemental Response to Data Requests

- 5) In Excel format, provide a table indicating the type and number of formal and informal complaints GOWC received from its customers for the following years: 2011/2012; 2012/2013; 2013/2014; and 2014/2015.

Response: See attached spreadsheet labeled GOWC Sup Resp MC8-005 (5).

**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Supplemental Response to ORA Data Request MC8-005 and know the contents thereof. I certify that the Supplemental Response to Data Requests MC8-005 is true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 10, 2015.

\_\_\_\_\_  
/s/  
Timothy S. Guster



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 10, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Wenli Wei, Financial Examiner  
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Lisa Bilar, Program and Project Supervisor  
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Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request MC8-006**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request MC8-006.

Pursuant to the instructions provided in Michael Conklin's August 3, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

For the following questions, refer to Excel spreadsheet "GOWC Response to MC8-001", provided by GOWC in response to ORA Data Request MC8-001, question 1.a:

- 1) Explain the meaning of the coding "aa," "bb," "cc," "dd," and "ee" shown on tab 1-A-1, columns M and S.

Response: The codes are provided for internal tracking purposes to make sure the same accounts appear in the two boxes where the codes appear on tab 1-A-1.

2) For the “Low Income Lost Revenue Account”:

- a. Please confirm that the balance shown in GOWC Response to MC8-001 is for the same account as the “Low Income Customer Assistance Program (LICAP) Memorandum Account” from Preliminary Statement H.

Response: Confirmed.

- b. Is the LICAP Memorandum Account a memorandum account or a balancing account? (GOWC Response to MC8-001 lists it as a balancing/reserve account on row 22 of tab “1-A-1” while Exhibit D, Chapter 6, section B states that it is a memorandum account).

Response: The LICAP Memorandum Account is a memorandum account.

- c. Explain the reasons behind estimating overhead allocation as 2 hours/year/customer at \$60/hour in 2008-2010?

Response: This was the estimate for the time spent by Great Oaks’ customer service employees each year for the processing of Low Income Customer Assistance Program documentation, including annual renewal applications.

- d. Overhead allocation is calculated using the formula “ $=(2*60)*number/6$ ” for 2011 through September 2012
- i. Explain the reasons behind dividing by 6 in this formula.

Response: Great Oaks bills bi-monthly. Dividing by 6 converts the cost to a bi-monthly cost.

- ii. The “*number*” in the formula above appears to be the number of enrolled LICAP participants. Please confirm that the number used in the formula above is the number of enrolled LICAP participants.

Response: Confirmed.

- e. Overhead allocation is calculated starting in October 2012 using the formula “ $=(2*1.95)*number$ .”
- i. Explain the reasons for using 1.95 in the formula.

Response: Great Oaks’ overhead expenses were reduced as a result of low-income data sharing authorized in D.11-05-020. Great Oaks reduced its overhead expenses at that time as a result. See, e.g., Resolution W-4973, in which the Commission approved this overhead expense.

- ii. The “*number*” in the formula above appears to be the number of enrolled LICAP participants. Please confirm that the number used in the formula above is the number of enrolled LICAP participants.

Response: Confirmed.

- f. What work is involved in the overhead allocation for this account?

Response: The “work” includes the following (Note: This is not intended to be an all-inclusive list under all circumstances. Additional work is required under different or changing circumstances.): Data transfers, analysis of data transferred, review of customer accounts, record-keeping for customer accounts, correspondence with customers, processing of opt-out letters, applications, and renewal applications, data entry, accounting, postage, compliance with Commission requirements pertaining to low income programs, periodic reporting on low income programs, responding to information requests on low income programs, communications with PG&E representatives regarding data transfers, and communications with low income customers inquiring about the LICAP program.

- g. Which employee(s) is/are doing the work related to overhead allocation on this account?

Response: All Customer Service employees, including the Customer Service Manager, Billing Systems Manager, Billing Systems Senior Analyst, Vice President and General Counsel, Chief Financial Officer.

- h. Provide supporting documentation to show that the employee(s) salaries and benefits covered in the overhead allocation for this account are not otherwise included in rates.

Response: See, e.g., D.05-05-015. When the Commission authorized LICAP for Great Oaks in Resolution W-4594, the Commission specifically referenced D.05-05-015 when instructing how to record costs of the Program in the authorized memorandum account. The Commission and ORA have reviewed Great Oaks’ procedures and LICAP memorandum accounts on multiple occasions and found no discrepancies. See, e.g., Resolution W-4973 and Resolution W-5047.

- i. Explain how the hard coded numbers in the “Lost Revenue” column are derived.

Response: The numbers are taken directly from the billing system entries for the individual months. See, e.g., response to data request 2.j., below.

- j. For the month of June 2014, provide the billing system entries supporting the balance of \$5,820.70.

Response: The “lost revenue” amount for June 2014 is \$13,384.27. The billing system entries supporting this amount are attached and labeled GOWC Response to ORA Data Request MC8-006 (2.j.).

- k. Explain how GOWC customers enroll in the Low Income Rate Assistance Program. In addition to an explanation of how GOWC customers enroll in the Low Income Rate Assistance Program, respond to the following specific questions regarding the Low Income Rate Assistance Program:

Response: New eligible LICAP participants are identified through data sharing or through Customer Service communications with customers. Customers identified through data sharing are given an opportunity to opt out (through written correspondence) before they are automatically enrolled. Customers are requested to complete the application prior to enrollment in LICAP. Existing LICAP participants are requested to complete the application for renewal of their participation. See, e.g., D.11-05-020.

- i. Provide a copy of the “application” mentioned in Tariff Rule 22 shown in Exhibit 6-1.

Response: See document attached and labeled GOWC Response to ORA Data Request MC8-006 (2.k.i.).

- ii. Is information about enrollment in the Low Income Rate Assistance Program on Great Oaks’ website? If so, please provide a link to this information on Great Oaks’ website.

Response: No. With the data exchange procedures, Great Oaks now contacts eligible customers directly.

- iii. Provide a copy of an example customer notice regarding the availability of the program.

Response: See example of “opt out” letter attached and labeled as GOWC Response to ORA Data Request MC8-006 (2.k.iii.).

1. Please identify the date and under what circumstance (GRC, etc.) the Low Income Lost Revenue account was last reviewed by ORA or DWA staff.

Response: See Resolution W-5047, issued June 25, 2015. Great Oaks requested amortization of the balance in the account through Advice Letter 244-W-B. Great Oaks had previously included other account balances for amortization in Advice Letter 244-W and its supplement Advice Letter 244-W-A. ORA protested Advice Letter 244-W-A, but agreed to withdraw its protest if Great Oaks only included the balance in the Low Income Customer Assistance Program account in a supplement to Advice Letter 244-W-A (which became Advice Letter 244-W-B). ORA reviewed and did not oppose Advice Letter 244-W-B.

- m. Exhibit D, Chapter 6, section B states that the LICAP Memorandum Account tracks “costs of publishing related notices.”
  - i. Provide the dollar amounts tracked in the LICAP Memorandum Account for each related notice.
  - ii. Identify where these dollar amounts are shown on tab “2-A-12 Low Income” in the spreadsheet “GOWC Response to MC8-001.”

Response: Great Oaks has not been required to publish notices regarding LICAP recently, so no charges for publishing notices are being tracked in the account at present. If the Commission requires notices to be published, those costs will be tracked in the account.

- n. In Excel format, provide the general ledger entries supporting the surcharge revenues associated with the Low Income Customer Assistance Program.

Response: Surcharge revenues are booked to the income account for all metered sales. Great Oaks tracks the LICAP surcharge revenues in the spreadsheet previously provided in response to ORA Data Request MC8-001.

- o. Exhibit D, Chapter 6, section B, p. 3 states that the amount tracked in the LICAP Memorandum Account in 2014 was \$230,622.48 whereas the

response to ORA Data Request MC8-001 states that the 2014 balance (without interest) is \$283,560.56. Please reconcile these two numbers.

Response: Commission Resolution W-5047, issued June 25, 2015, authorized Great Oaks to recover the LICAP account balance of \$325,830, the amount in the account as of February 15, 2015.

- p. State whether Great Oaks plans to close the LICAP memorandum account if it is to implement the proposed LICAP balancing account and surcharge.

Response: If Great Oaks' request is approved, Great Oaks would amortize any remaining balance in the memorandum account and close the memorandum account.

- q. Exhibit D, Chapter 6, section B, p. 3 states in the proposed language for the LICAP surcharge that the proposed surcharge will be added to the quantity rate for all water delivered, rather than on only the water delivered to non-LICAP participants.

- i. Why does Great Oaks propose that LICAP participants and non-participants all pay the LICAP surcharge?

Response: The LICAP provides a discount on meter service charges, not on quantity charges.

- r. Exhibit D, Chapter 6, section B, p. 4 states that the LICAP surcharge is based upon projected credits and charges and projected water sales and will be calculated upon final determination of Test Year meter service charges using current LICAP customer numbers. Please provide this calculation.

Response: Application 15-07-001 is still pending and there has not been a final determination of Test Year meter service charges. It is premature to perform the requested calculation.

- 3) For the account labeled "Recovery: Settle 2009 GRC DPAD Calc & Mgmt Lbr Alloc To Non Utility Activities":

- a. Is this account shown listed on tab 1-A-1 of GOWC Response to MC8-001 the same account as the "A.09-09-001 Limited Rehearing Under-Collection Balancing Account" described in Preliminary Statement Q? If not, what preliminary statement describes this account?

Response: Yes.

- 4) For the Conservation Memorandum Account:

- a. Exhibit D, Chapter 6, Section B.3. discusses a "Conservation Lost Revenue and Expense Memorandum Account." Is this the same account as the "Conservation Memorandum Account" detailed on tab WP 2-A-24 RC?

Response: Yes.

- b. Is the Conservation Memorandum Account detailed on tab WP 2-A-24 RC the same as the Conservation Lost Revenue and Expense Memorandum Account described in Preliminary Statement S?

Response: Yes.

- c. In PDF format, provide a copy of WaterSmart invoice #1198 (gross before 50% reimbursement from SCVWD).

Response: See document attached and labeled GOWC Response to ORA Data Request MC8-006 (4.c.).

- d. Which employee(s) or person(s) provided the 50 email replies @ 15 minutes each and the labor for the 45 individual letters?

Response: Timothy S. Guster

- i. Provide supporting documentation to show that the salaries and benefits of the employee(s) or person(s) who provided the 50 email replies at 15 minutes each and the labor for the 45 individual letters are not otherwise included in rates.

Response: The conservation programs did not exist at the time salaries and benefits for Great Oaks were authorized in D.13-05-020. All actions of employees related to additional conservation actions are incremental additional costs and are in addition to actions for which salaries and benefits were authorized in D.13-05-020.

- e. Decision 10-11-034 states in Ordering Paragraph 8 that “. . . (Great Oaks) may file a Tier 2 advice letter requesting memorandum account treatment for conservation expenses if it first meets and confers with the Division of Ratepayer Advocates and in the advice letter proposes specific programs and expenditure caps. . . .” Did Great Oaks request the conservation expense memorandum account listed above?
- i. If so, identify the advice letter.

Response: See Resolution W-4976.

- f. Does Great Oaks have costs related to conservation included in rates?

Response: No. Great Oaks has requested authorization to implement the WaterSmart program beginning July 1, 2016. If authorized, costs associated with the WaterSmart program would then not be included in the Conservation Lost Revenue and Expense Memorandum Account.

If the answer to question f. immediately above is yes,

- i. How much conservation expenses are included in rates?
- ii. Which account(s) are those conservation expenses included in?

- iii. In Excel format, provide a breakdown of the amount and activity associated with each recorded conservation expense for 2012 - 2014.

Response: No responses required for subparts i., ii., and iii.

- 5) For the “Contamination Proceeds Memorandum Account”
  - a. Tab “2-A-21 RC Contamination Proceed” shows an entry of (\$654,800.07) in September 2012.
    - i. What is the source of these contamination damage awards or settlements? Please provide detailed background or a reference to where GOWC previously provided that information.

Response: See D.10-10-018. See also Great Oaks Advice Letter 228-W-A.

- ii. Explain why this balance is not earning interest.

Response: This is not required under the authorization for the account.

- iii. Did GOWC have legal expenses associated with these contamination damage awards or settlements? If so, where did GOWC book those contamination litigation costs?

Response: See Great Oaks Advice Letter 228-W-A.

- iv. Has GOWC spent money on replacement or remediation due to the 2003 MTBE contamination?
- v. Does GOWC anticipate replacement or remediation needs due to the 2003 MTBE contamination?

Response: See Great Oaks Advice Letter 228-W-A.

6) For Monterey-WRAM Recovery Accounts:

- a. For the M-WRAM recovery for the following dates: 1/10/13 to 8/8/14 – Surcharge 9/2/14 to 9/1/15, the balance listed under Tab 1-A-1 in the spreadsheet “GOWC Response to MC8-001” is (\$256,972.46) as of December 31, 2014. However, the balance listed in the March 9, 2015 Balancing Account Report under the account “Monterey-Style WRAM balancing Account (AL 242-W Surcharge)” is “-\$219,918.67”
  - i. It appears that “-\$219,918.67” is the February 28, 2015 balance. Please confirm.

Response: The February 28, 2015 balance was the amount remaining at that time to be recovered through the surcharge authorized under Great Oaks Advice Letter 242-W. When an amount in the Monterey-style Water Revenue Adjustment Mechanism account is

amortized through a surcharge, the balance is recorded in a balancing account where amounts collected are recorded.

- b. For this authorized M-WRAM surcharge as well as the two other M-WRAM surcharges listed for the time periods (5/9/11 – 2/11/12) and (4/16/12 – 1/7/13), provide all supporting documentation for the hard-coded data in the “billings” column.

Response: See Great Oaks Advice Letters 223-W, 229-W-A, and 242-W.

- c. Please provide an example residential customer bill from July 2015 showing these surcharges.

Response: The only applicable M-WRAM surcharge at present is the surcharge authorized through Advice Letter 242-W for the period from September 2, 2014 to September 1, 2015. See document attached and labeled GOWC Response to ORA Data Request MC8-006 (6.b.). Note that the customer name and service address have been redacted for customer privacy reasons.

7) For Monterey-WRAM Memorandum Account:

- a. The following questions are regarding the file GOWC Response to MC8-001, tab “2-A-15-RCM-WRAM Memo” for the time period 7/14/2014 – 12/29/2014.
  - i. Provide all calculations and supporting documentation behind the calculation of the “Actual Billed Tiered” column (including tariff sheets, actual sales volumes, billing data, and other relevant documentation).
  - ii. Provide all calculations and supporting documentation behind the calculation of the “Projected Billed Uniform” (including tariff sheets, actual sales volumes, and other relevant documentation).

Response: For subparts i and ii, see data submitted with Great Oaks Advice Letter 242-W. If you do not have access to or cannot find this data, please contact Great Oaks and a data disk will be sent to you with more than 11 MB of data.

- iii. Explain why there is no surcharge or balance listed for the period 2/11/2012 – 4/16/2012.

Response: Great Oaks’ Monterey-style WRAM (M-WRAM) account was authorized in D.10-11-034 and was implemented through the filing of Advice Letter 202-W. When Great Oaks first attempted to amortize the balance in the M-WRAM through its Advice Letter 217-W, flaws in the design of Great Oaks’ conservation rates and the M-WRAM were revealed. See, e.g., Advice Letters 217-W - 218-W and Resolution W-4910. The Commission determined that the terms of the M-WRAM required modification and the terms were modified through the filing of Advice Letters 221-W and 222-W. It is believed that there was a gap in the authorization for the M-WRAM during this period of time when the terms of the M-WRAM were in flux.

8) For the Santa Clara Valley Water District (SCVWD) Memorandum Account:

- a. In PDF format, provide the invoices that comprise the following recorded entries shown on tab “SCVWD”:

Response: Objection. This data request seeks the discovery of information protected by the attorney/client privilege and attorney work product doctrine in that the billing entries contain information about litigation strategy and advice. Great Oaks can provide redacted bills showing non-privileged information upon request.

- i. May 2006: \$28,133.11
- ii. December 2006: \$46,451.75
- iii. June 2007: \$70,575.43
- iv. August 2007: \$96,836.73
- v. June 2008: \$155,557.68
- vi. September 2008: \$296,521.66
- vii. April 2009: \$194,994.71
- viii. January 2010: \$172,470.41
- ix. December 2011: \$82,267.57

- b. Great Oak’s Application states on page 8 that “the number of lawsuits has increased due exclusively to the delay experienced in the court system.” Please explain in detail what court system delay Great Oaks is referring to, including the time period the court system experienced a delay.

Response: See Exhibit I – Litigation Summary, page 1. The lead case (105CV053142) was filed on November 22, 2005. Judgment was entered in the trial court on February 3, 2010. SCVWD appealed that judgment. It is now August 2015 and no final determination has been issued by the court of appeal.

- c. GOWC Exhibit D, Chapter 5, page 29 states that Great Oaks is requesting the cap on expenses be removed. What is the dollar amount of the current cap on expenses that Great Oaks is seeking to have removed?

Response: See Great Oaks Tariff Sheet 465-W.

- d. Does the balance in the SCVWD Memorandum Account exceed the cap? If so, explain why.

Response: Yes. Costs have exceeded the cap. Great Oaks continue to track all costs.

- e. Does Great Oaks’ requested modification to the SCVWD Memorandum Account result in potential ratepayer recovery of litigation expenses in excess of \$100,000?

Response: No. Ratepayers have not incurred any litigation expenses so there are no litigation expenses for ratepayers to recover.

- f. What was Great Oak's original estimate for the litigation expenses when the SCVWD Memorandum Account was authorized?

Response: See Great Oaks Advice Letter 169-W.

- g. What is the statute of limitations on potential refunds or rebates of taxes paid or misallocated?

Response: Objection. This data request seeks a legal opinion and/or work product of counsel.

- h. Has GOWC thus far lost the opportunity for any recovery due to the statute of limitations? If so, identify how much and for which years?

Response: Objection. This data request seeks a legal opinion and/or work product of counsel. Without waiving this objection, the answer is no.

- i. Now that the case has been remanded back to the trial court, what does Great Oaks foresee as the next general steps in the SCVWD litigation?

Response: See Exhibit I – Litigation Summary, page 1.

- j. When does Great Oaks anticipate the SCVWD litigation will be resolved?

Response: Objection. Responding to this data request requires speculation on the part of Great Oaks. Without waiving this objection, see Exhibit I – Litigation Summary.

- k. What is the most recent assessment of the likelihood that Great Oaks will prevail in its SCVWD litigation?

Response: Objection. This data request seeks a legal opinion and/or work product of counsel.

- l. For each proceeding listed in Exhibit I, GOWC Litigation Summary, identify GOWC's legal representation.

Response: Proceeding 1: Jeffrey S. Lawson (Silicon Valley Law Group); Robert K. Johnson and Omar F. James (Johnson & James, LLP); Timothy S. Guster (Great Oaks Water Company). Proceedings 2 – 10: Johnson & James, LLP and Guster. *Great Oaks Water Company v. City of San Jose*: Allen Ruby (Skadden, Arps, Slate, Meagher & Flom LLP). *MacClellan v. Martinez* and *Great Oaks Water Company v. Bahaguna*: Bradley Matteoni and Norman Matteoni (Matteoni, O'Laughlin & Hechtman).

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: August 10, 2015

\_\_\_\_\_/s/  
Timothy S. Guster  
Vice President and General Counsel  
Legal and Regulatory Affairs  
Great Oaks Water Company  
PO Box 23490  
San Jose, CA 95153  
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**VERIFICATION**

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request MC8-006 and know the contents thereof. I certify that the Responses to Data Requests MC8-006, numbers 2.f, 2.h, 2.k - 2.m, 2.o – 2.r, 4.c – 4.f, 5, 6.b, 6.c, 7.a.iii, and 8 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 10, 2015.

\_\_\_\_\_/s/  
Timothy S. Guster

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request MC8-008 and know the contents thereof. I certify that the Responses to Data Request MC8-008, numbers 1, 2.a – 2.g, 2.i, 2.j, 2.n, 2.o, 3, 4.a, 4.b, 4.d, 5, 6, and 7 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 10, 2015.

\_\_\_\_\_/s/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
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(408) 227-9540

August 31, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
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Wenli Wei, Financial Examiner  
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Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request MC8-007**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request MC8-007.

Pursuant to the instructions provided in Michael Conklin's August 24, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. The 2009/2010 total recorded salary data presented in GOWC's 2012 workpapers shows \$1,891,724, however, the same 2009/2010 recorded salary data presented in GOWC's current GRC workpapers Exhibit E, tab WP10- Employees and Salaries, shows \$1,915,969. A similar discrepancy exists for the 2010/2011 recorded data between the two GRC workpapers:

- A. Please explain why recorded data for the same time periods do not match between information presented by GOWC in two GRCs.

Response: It appears that the data from the 2012 general rate case contains errors, most likely resulting from not including overtime pay and data entry. 2015 data includes overtime pay and uncapped CEO compensation in 2010/2011.

- B. Please advise which amounts are the correct recorded data.

Response: 2015 data is accurate to the best of my knowledge.

2. Refer to GOWC workpaper Exhibit E, tab WP10-Employees and Salaries, cell C44 that shows the recorded 2010/2011 amount of CEO salary as \$533,929.

- A. If this amount is correct, explain why it is approximately \$200,000 more than the surrounding years.

Response: 2010/2011 data includes a paid bonus. All other values for CEO compensation are capped for ratemaking purposes (i.e., any higher paid compensation is not included in rates). 2010/2011 CEO compensation does not affect Test Year or Escalation Year projections.

- B. If this amount is incorrect, state the correct amount.

Response: See answer to subpart A, above.

3. Refer to GOWC workpaper Exhibit E, tab WP10-Employees and Salaries, cell D24 that shows recorded 2011/2012 amount of VP-Operations salary as \$15,060.

- A. If this amount is correct, explain why the amount is so low compared to surrounding years.

Response: The VP-Operations retired on July 29, 2011.

- B. If this amount is incorrect, state the correct amount.

Response: No answer required.

4. Refer to GOWC workpaper Exhibit E, tab WP10-Employees and Salaries, cell F32 that shows recorded 2013/2014 amount of Water System Operator salary as \$23,490.

- A. If this amount is correct, explain why the amount is so low compared to surrounding years.

Response: Employee terminated November 22, 2013.

B. If this amount is incorrect, state the correct amount.

Response: No answer required.

5. Provide a list of all employees that have retired, or have been terminated from GOWC since January 1, 2009, including:

- A. Employee name.
- B. Position title.
- C. Final annual salary.
- D. Number of years with GOWC.
- E. Whether retired or terminated.

Response:

- A. [REDACTED]
- B. Lead Water System Operator
- C. \$80,000
- D. 15
- E. Retired

- A. [REDACTED]
- B. Water System Operator IV
- C. \$64,500
- D. 14
- E. Terminated

- A. [REDACTED]
- B. Regulatory Attorney
- C. \$178,700
- D. 6
- E. Retired

- A. [REDACTED]
- B. Vice President, Operations/Construction
- C. \$131,900
- D. 20
- E. Retired

- A. [REDACTED]
- B. Chief Financial Officer
- C. \$150,000
- D. 4
- E. Terminated

- A. [REDACTED]
- B. Chief Water System Operator/Water Quality Manager
- C. \$98,000
- D. 16
- E. Resigned

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request MC8-007 and know the contents thereof. I certify that the Responses to Data Request MC8-007 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 31, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

September 1, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Wenli Wei, Financial Examiner  
[wenli.wei@cpuc.ca.gov](mailto:wenli.wei@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request MC8-008**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request MC8-008.

Pursuant to the instructions provided in Michael Conklin's August 25, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. Explain why in the previous GRC, GOWC forecasted zero agricultural customers, and zero agricultural sales due to customer bankruptcies, yet GOWC recorded 2013/2014 agricultural sales of 19,439 CCF.

**Response:** See Great Oaks Water Company 2012 General Rate Case Application 12-07-005, Exhibit D, Chapter 6, pages 4-5. Customers qualifying for the irrigation quantity charge credit authorized in D.13-05-020 are considered agricultural customers.

2. Refer to GOWC workpaper WP3-Water Sales CCF and explain why the number of forecasted 2016/2017 agricultural customers is six, yet forecasted 2016/2017 CCF water sales is zero.

**Response:** Water sales to agricultural customers are variable and inconsistent. See response to question number 1, above. In addition, customers qualifying for the irrigation quantity charge credit are subject to Schedule No. 1 General Metered Service. Great Oaks projects that six customers will qualify for the Schedule No. 1 irrigation quantity charge credit.

3. List the names of all six agricultural customers GOWC forecasted for 2016/2017.

**Response:** Great Oaks requests CONFIDENTIAL TREATMENT of this response, [REDACTED]

4. Explain why recorded 2012/2013 Industrial Sales on workpaper WP3-Water Sales CCF shows 111,403 CCF, but Exhibit D, Water Sales Forecast, Table 1, shows recorded 2012/2013 Industrial Sales 98,482 CCF.

**Response:** The values in Exhibit D, Chapter 4, Water Sales Forecast, are correct. The error on page WP-3 of Exhibit E, GRC Workpapers, is an error and is of no consequence to the Water Sales Forecast or requested rates, as the forecasted amounts in Chapter 4 are used for ratemaking purposes.

5. GOWC 's response to Data Request MC8-004 states there is "one large area being developed in Great Oaks' service area expected to have an additional 320 residential customers beginning in TY 2015/2016." Regarding this new area:

A) Provide the general address of the development.

**Response:** East of Cottle Road, between Highway 85 and Great Oaks Boulevard, San José, California.

B) State the name and contact information of the developers.

**Response:** Hitachi Global Storage Technologies, Inc., 5601 Great Oaks Parkway, San José, CA 95119-1003, Attention: David Koury.

C) State whether any of these customers has been added thus far in 2015.

Response: Yes.

D) Explain how this new area being developed is accounted for in GOWC's capital additions, Contributions In Aid of Construction (CIAC) and Advances For Construction (AFC) balances.

Response: Great Oaks uses the Commission's Uniform System of Accounts and the procedures described therein to account for new development capital additions, CIAC, and AFC.

E) Explain how GOWC derived the number 320 for additional customers.

Response: Great Oaks started with the total number of services in the development and then subtracted the services that are already active to arrive at 320 additional (future) customers.

F) Provide third-party documentation supporting the 320 number of customers.

Response: Great Oaks did not require third party support to perform the calculation described above.

6. In Excel spreadsheet format, provide the recorded water sales data in CCF for the year 2014/2015 for each of the following category classes:

- a) Single-Family Residence
- b) Multi-Family Residence
- c) Business
- d) Industrial
- e) Public Authority
- f) Schools
- g) Private Landscape
- h) Total Non-Ag. Sales
- i) Agriculture
- j) Total Water Sales
- k) Unaccounted for Water
- l) Total Water Produced

Response: See document attached and labeled GOWC Response to ORA Data Request MC8-008(6).

**VERIFICATION**

I, John Roeder, am Chief Executive Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request MC8-008 and know the contents thereof. I certify that the Responses to Data Request MC8-00, number 5 and subparts thereof, are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 1, 2015.

\_\_\_\_\_  
/S/  
John Roeder

**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request MC8-008 and know the contents thereof. I certify that the Responses to Data Request MC8-008, numbers 1-4 and 6, are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 1, 2015.

\_\_\_\_\_  
/S/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

September 8, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Wenli Wei, Financial Examiner  
[wenli.wei@cpuc.ca.gov](mailto:wenli.wei@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request MC8-009**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request MC8-009.

Pursuant to the instructions provided in Michael Conklin's August 31, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Because the original due date for Great Oaks' responses was Labor Day, September 7, 2015, Great Oaks suggested and ORA agreed that the responses would be due on September 8, 2015.

Responses to Data Requests

1. GOWC's response to DR MC8-005, question 8 states that if payment is not received within 19 days of the billing date, it is considered past-due and customers are notified they have 17 days to make payment to avoid disconnection.
  - a. Describe how this notification is made.

Response: Notification is made pursuant to Tariff Rule No. 11.

- b. If the above notification is made via US mail or email, provide a copy of the notice.

Response: See documents attached and labeled GOWC Response to ORA Data Request MC8-009(1). The documents included in this response include the customer's original bill, which went unpaid, followed by the complete series of notices through service disconnection.

- c. If the above notification is made via phone call or in person, describe the process including the information communicated to the customer and any information collected from the customer.

Response: See response to subpart b., above.

- 2. GOWC's response to DR MC8-005, question 8 states that if payment is still not made within the 17 days, a GOWC employee will deliver an urgent notice to the customer (typically) on a Thursday that the following Monday service will be disconnected.

- a. Provide a copy of the urgent notice described in GOWC's response to MC8-005, question 8.

Response: See document attached and labeled GOWC Response to ORA Data Request MC8-009(1).

- b. Is the urgent notice delivered to the customer in-person?

Response: Great Oaks makes a reasonable attempt to personally contact an adult person on the customer's premises with the urgent notice.

- c. If the answer to question 2.b above is yes, describe the process if the in-person contact is not/cannot be made for any reason.

Response: If there is nobody home, or if there is no adult at home, the notice is left in a conspicuous place at the service address.

- d. List any additional information normally communicated to the customer not contained in the urgent notice.

Response: None.

- e. List any information normally collected from the customer during communication of the urgent notice.

Response: None.

3. Regarding customer re-connections for service that has been disconnected:

a. Describe the process for re-connection after a customer is disconnected.

Response: See Great Oaks' Tariff Rule No. 11.

b. What is the re-connection fee charged to GOWC's customers?

Response: See Great Oaks' Tariff Rule No. 11.

c. Cite to any Commission decision or resolution that adopts GOWC's re-connection fee.

Response: See, e.g., D.10-11-034.

d. Provide a cost breakdown substantiating GOWC's reconnection fee.

Response: See D.10-11-034. See also Exhibit 16 from Great Oaks' 2009 general rate case, pages 2-10 and 2-11.

4. For each GOWC service disconnection over the past 3 years, through June 30, 2015:

a. List the date of the disconnection.

b. List the customer ID number in GOWC's system.

c. List the outstanding balance at the time of disconnection.

d. List the last billed amount for one full billing cycle of water service for each disconnected customer, not including any previously unpaid amounts.

e. List the date (if applicable) the customer was reconnected.

f. List whether the disconnected customer was enrolled in GOWC's LICAP program.

Response: Objection. This data request is not reasonably calculated to lead to the discovery of relevant evidence on any issue in this proceeding and is unduly burdensome. Great Oaks requests that ORA provide an explanation of the relevance of the information requested to any issue in this proceeding, including why three years of information is requested, why the dates of disconnection are relevant, why the outstanding balances at the time of disconnection are relevant, why the last billed amounts for one full billing cycle of water service for each disconnected customer are relevant, why the dates of reconnection are relevant, and why customer enrollment in the LICAP program is relevant.

Without waiving this objection, Great Oaks states that the table below shows the number of times the reconnection fee (\$25) was charged and the total amount of reconnection fees collected for the years 2012 through September 4, 2015.

Year >>	2012	2013	2014	2015
Reconnections	356	402	351	250
Reconnection Fees	\$8,900	\$10,025	\$8,775	\$6,250

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: September 8, 2015

\_\_\_\_\_/s/  
 Timothy S. Guster  
 Vice President and General Counsel  
 Legal and Regulatory Affairs  
 Great Oaks Water Company  
 PO Box 23490  
 San Jose, CA 95153  
 Telephone: (408) 227-9540  
 Facsimile: (408) 227-7126  
 Email: tguster@greatoakswater.com

### VERIFICATION

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request MC8-009 and know the contents thereof. I certify that the Responses to Data Request MC8-009 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 8, 2015.

\_\_\_\_\_/S/  
 Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

October 15, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Wenli Wei, Financial Examiner  
[wenli.wei@cpuc.ca.gov](mailto:wenli.wei@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
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Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request MC8-010**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request MC8-010.

Pursuant to the instructions provided in Michael Conklin's email transmitting the Data Request, these responses are being provided by email to those on ORA's originating Data Request email.

Responses to Data Requests

1. Please provide a copy of the Audit Report referenced in the Settlement adopted in Commission D.15-03-006. For GOWC's reference, ORA provides the relevant Decision language below:

“Audit. The Parties expressly agree that an independent audit shall be performed and a report on such audit shall be submitted to the Commission's Division of Water and Audits and to ORA on or before September 30, 2015. The audit report shall include financial information on the acquisition and reorganization and

compliance with the Affiliate Transaction Rules, including financial information regarding the assets, liabilities, and any other tangible property distributed from GOWC to Corporation under the Contribution Agreement.”

Response: See documents attached and labeled GOWC Response to ORA Data Request MC8-010(1).

### VERIFICATION

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request MC8-010 and know the contents thereof. I certify that the Responses to Data Request MC8-010 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on October 15, 2015.

\_\_\_\_\_  
/s/  
Timothy S. Guster



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 4, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Sung B. Han, Senior Utilities Engineer  
[sbh@cpuc.ca.gov](mailto:sbh@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request SBH-001**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request SBH-001.

Pursuant to the instructions provided in Michael Conklin's July 22, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. The Internal Revenue Service Issued its Tangible Property Regulation ("TPR") in 2013 (T.D. 9689), which allows taxpayers to expense substantial portions of previously capitalized maintenance expenditures.
  - a. State whether GOWC took advantage of the TPR in the 2013 taxable year by either normalizing or flowing through the tax reduction.

Response: Great Oaks does not believe TPR is applicable for its expenses based upon its understanding of the requirements for TPR.

- b. State whether GOWC took advantage of the TPR in the 2014 taxable year by either normalizing or flowing through the tax reduction.

Response: See response to 1.a., above.

- c. If GOWC did take advantage of TPR and the effect of TPR is reflected in the workpapers that GOWC has submitted for this GRC, please provide the exact workpaper reference(s).

Response: See response to 1.a., above.

- d. If GOWC did take advantage of TPR but the effect of TPR is NOT reflected in the workpapers that GOWC has submitted for this GRC, state GOWC's rationale for not normalizing or flowing through the effect of TPR in this GRC.

Response: See response to 1.a., above.

- e. If GOWC did not take advantage of TPR, explain why GOWC choose not to take advantage of TPR and provide revised workpapers normalizing TPR assuming that GOWC had taken advantage of TPR.

Response: See response to 1.a., above.

### **VERIFICATION**

I, John Roeder, am Chief Executive Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request SBH-001 and know the contents thereof. I certify that the Responses to Data Request SBH-001 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 4, 2015.

\_\_\_\_\_  
/S/  
John Roeder



# GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 4, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Sung B. Han, Senior Utilities Engineer  
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Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request SBH-002**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request SBH-002.

Pursuant to the instructions provided in Michael Conklin’s July 22, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA’s originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. For line item “Deferred Income Tax”, Great Oaks’ Workpaper WP-28 shows zero balances for the recorded calendar years 2013, 2014 and the projected year 2014/2015, while the adopted years 2013/2014 and 2014/2015 show \$1,896,085 and \$2,018,378, respectively. Please explain the differences between the adopted amounts and the recorded Deferred Income Tax.

Response: In 2013, Great Oaks filed an election to be taxed as an S Corporation. The election was temporary and was related to the reorganization that became the subject of A.14-04-035 and was approved in D.15-03-006. Effective January 1, 2016, Great Oaks is reverting to C Corporation status. For tax purposes, when the tax status of an entity changes from a C Corporation to an S Corporation, the deferred income taxes are removed from the balance sheet, as are investment tax credits. When the C Corporation status is re-established, the deferred income taxes and investment tax credits are reinstated to the balance sheet.

2. For line item “Deferred Investment Tax Credit”, Great Oaks’ Workpaper WP-28 shows zero balances for the recorded calendar years 2013, 2014 and the projected year 2014/2015, while the adopted years 2013/2014 and 2014/2015 show \$30,859 and \$25,466, respectively. Please explain the difference between the adopted amounts and the recorded Deferred Investment Tax Credit.

Response: See response to 1, above.

### VERIFICATION

I, John Roeder, am Chief Executive Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request SBH-002 and know the contents thereof. I certify that the Responses to Data Request SBH-002 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 4, 2015.

\_\_\_\_\_  
/s/  
John Roeder



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

August 6, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Sung B. Han, Senior Utilities Engineer  
[sbh@cpuc.ca.gov](mailto:sbh@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request SBH-003**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request SBH-003.

Pursuant to the instructions provided in Michael Conklin's July 31, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. GOWC's Excel workpaper Exhibit E, tab "WP37- 2015-2016 Taxes" shows that GOWC used 6.5% for interest rate and debt to capital ratio of 30% to calculate its interest expense for income tax calculation. Please provide the source documents for the above interest rate and debt to capital ratio and explain GOWC's rationale for using them.

Response: The interest rate should be 7.5% with a debt to capital ratio of 30% per D.13-05-027. The interest rate will be corrected throughout Great Oaks' Workpapers on or before August 15, 2015.

### VERIFICATION

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company's Responses to ORA Data Request SBH-003 and know the contents thereof. I certify that the Responses to Data Request SBH-003 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 6, 2015.

\_\_\_\_\_  
/s/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
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(408) 227-9540

August 14, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
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Shanna Foley, Attorney for ORA  
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**RE: Great Oaks Water Company Responses to ORA Data Request SBH-004**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request SBH-004.

Pursuant to the instructions provided in Michael Conklin's August 7, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. GOWC's Response to ORA's Data Request SBH-002, question 1 states:

"In 2013, Great Oaks filed an election to be taxed as an S Corporation. The election was temporary and was related to the reorganization that became the subject of A.14-04-035 and was approved in D.15-03-006. Effective January 1,

2016, Great Oaks is reverting to C Corporation status. For tax purposes, when the tax status of an entity changes from a C Corporation to an S Corporation, the deferred income taxes are removed from the balance sheet, as are investment tax credits. When the C Corporation status is reestablished, the deferred income taxes and investment tax credits are reinstated to the balance sheet”.

- A) Please provide the page references to D.15-03-006 or any other Commission’s decisions that direct GOWC to remove the deferred income taxes and the deferred investment tax credits from its balance sheet.

Response: None. Removal of the deferred income taxes and deferred investment tax credits from the balance sheet was pursuant to GAAP rules.

- B) Provide revised workpapers for the deferred income taxes and the deferred income tax credits balances for the recorded years 2013, 2014 and projected years 2014/2015, 2015/2016, Test Year 2016/2017 and escalation years 2017/2018 and 2018/2019 assuming there was no removal of the deferred income taxes and the income tax credits due to GOWC’s reorganization.

Response: See attached spreadsheet labeled A1507001Great Oaks Water Company’s Updated and Corrected Exhibit E, GRC Workpapers. Great Oaks has included the data on deferred income taxes and deferred income tax credits on pages WP-25 through WP-28.

### VERIFICATION

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request SBH-004 and know the contents thereof. I certify that the Responses to Data Request SBH-004 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on August 14, 2015.

\_\_\_\_\_  
/S/  
Ron Ceolla



## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
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August 14, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
[michael.conklin@cpuc.ca.gov](mailto:michael.conklin@cpuc.ca.gov)

Lisa Bilar, Program and Project Supervisor  
[lisa.bilar@cpuc.ca.gov](mailto:lisa.bilar@cpuc.ca.gov)

Sung B. Han, Senior Utilities Engineer  
[sbh@cpuc.ca.gov](mailto:sbh@cpuc.ca.gov)

Shanna Foley, Attorney for ORA  
[shanna.foley@cpuc.ca.gov](mailto:shanna.foley@cpuc.ca.gov)

**RE: Great Oaks Water Company Responses to ORA Data Request SBH-005**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request SBH-005.

Pursuant to the instructions provided in Michael Conklin's August 10, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. GOWC's Workpaper WP45-Property Taxes, column "Projected July 2014 to June 2015" shows hard coded numbers for Assessed Value and Taxes.
  - A. Please provide the source documents for these hard-coded numbers.

Response: See documents attached and labeled GOWC Response to ORA Data Request SBH-005 (1). Note: Due to the size of the files, the documents will be transmitted in three parts.

- B. In Excel format, provide the corresponding numbers for the most recent five years' recorded numbers for the above Assessed Values and Taxes.

Response: See spreadsheet attached and labeled GOWC Response to ORA Data Request SBH-005 (1.B.).

2. Provide a copy of GOWC's actual source document property tax bill for the second half of 2014 and the first half of 2015.

Response: See documents attached and labeled GOWC Response to ORA Data Request SBH-005 (1).

3. Provide a copy of GOWC's actual source document property tax bill for the second half of 2015 and first half of 2016. If not yet available, please provide the property tax bill when it becomes available.

Response: The requested property tax bills have not been issued. Typically, the property tax bills are sent/received in the September/October time frame.

4. GOWC's workpaper WP44-ER Payroll Taxes shows CA UIT rates of 4.9%, 5.00% and 5.10% for 2016/2017, 2017/2018 and 2018/2019, respectively. In PDF format, provide the source documents to support these tax rates.

Response: Exhibit E, GRC Workpapers, page WP-44, Cell AC10 shows a rate of 4.8%, not 4.9%, as provided in the data request. The 4.8% rate for 2016/2017 is the average of the CY2014 rate of 4.7% and the CY2015 rate of 4.9%. The average of the two calendar year rates provides a blended rate for 2014/2015 (a non-calendar year). The 0.1% increase from 2014/2015 was then trended for the 2015/2016 year. Since the CA UIT rate is fairly stable, the 4.9% rate from CY2015 was used for Test Year 2016/2017. The rate was then trended (0.1% increases) for Escalation Years 2017/2018 and 2018/2019 to be conservative.





## GREAT OAKS WATER COMPANY

P. O. BOX 23490  
SAN JOSE, CA 95153  
(408) 227-9540

September 1, 2015

***Via email to:***

Michael Conklin, ORA Project Coordinator  
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Lisa Bilar, Program and Project Supervisor  
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**RE: Great Oaks Water Company Responses to ORA Data Request SBH-006**

Great Oaks Water Company (Great Oaks) hereby provides its responses to ORA Data Request SBH-006.

Pursuant to the instructions provided in Michael Conklin's August 25, 2015 email transmitting the Data Request, these responses are being provided by email to those on ORA's originating DR email. Items for which confidential treatment is requested are specifically marked and an explanation is provided for the request.

Responses to Data Requests

1. GOWC's workpaper WP-37 shows that GOWC's tax depreciation for federal and state income taxes are calculated using a historical ratio between the tax depreciation and the book depreciation. For Test Year 2016/2017 and Escalation Years 2017/2018 and 2018/2019, please provide detailed tax depreciation calculations for each asset class and a revised income tax calculation for the federal

and state income taxes using the detailed tax depreciation calculations for each asset class.

Response: Objection. This is not a genuine data request, but is instead a request for Great Oaks to perform a series of hypothetical tax calculations. The request does not seek relevant evidence and is not reasonably calculated to lead to the discovery of relevant evidence. In addition, in order to comply, Great Oaks would have to reprogram its computer system, create a fictitious list of assets for three different time periods, and then attempt to have the system perform calculations as if it was operating in those different time periods. Great Oaks is not certain the computer is capable of performing this series of calculations without causing either damage to the system or producing error.

2. Provide the tax depreciation schedules and workpapers filed with the federal and state income taxes for 2013 and 2014 taxable years.

Response: Great Oaks provided this information with the printed copies of its original Exhibit E, GRC Workpapers.

Objections to the Data Requests have been made by Timothy S. Guster, Vice President and General Counsel for Great Oaks Water Company.

Date: September 1, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
Timothy S. Guster  
Vice President and General Counsel  
Legal and Regulatory Affairs  
Great Oaks Water Company  
PO Box 23490  
San Jose, CA 95153  
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**VERIFICATION**

I, Ron Ceolla, am Chief Financial Officer of Great Oaks Water Company, the Applicant in this proceeding. I have read Great Oaks Water Company’s Responses to ORA Data Request SBH-006 and know the contents thereof. I certify that the Responses to Data Request SBH-006 are true of my own knowledge, except as to matters as are therein stated to be true upon information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, California on September 1, 2015.

\_\_\_\_\_/S/\_\_\_\_\_  
Ron Ceolla