

# VIA EMAIL ONLY (MARIACARMEN.ROCHA@CPUC.CA.GOV)

February 18, 2025

Carmen Rocha
Utilities Engineer
Water Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: <u>Semi-Annual Balancing Account Filings for Class A and B Investor Owned Water Utilities</u>

Dear Ms. Rocha:

Please see attached California-American Water Company's Semi-Annual Balancing Account report, attached hereto as Attachment A.

Please let me know if you have any questions.

Thank you,

/s/ Demetrio A. Marquez

Demetrio A. Marquez Supervisor Paralegal

cc: James Boothe Bruce DeBerry

Cathy Hongola-Baptista

Wes Owens
Jonathan Morse
Stacey Fulter

Kristina Remelius (all via email only

#### **ATTACHMENT A**

Subject: Authorized Balancing Account Outstanding Balances (A)

(1) Balancing accounts with a quarter-end balance with more than a 10-percent differential from the balancing account's authorized revenue amount.

RESPONSE: California American Water interprets "authorized revenue amount" to be the most recent amount authorized for recovery in California American Water's last General Rate Case (D.24-12-025), or the most recently reviewed balance as designated below. The following table lists the accounts with a quarter-end balance with more than a 10% differential from the "authorized revenue amount."

Table 1

				nt Conducted view	
District	Balancing Account	Balance at 12/31/24	Authorized Balance	GRC/AL	% Differential
All Districts	OPEB Balancing Account	285,336	2,392,920	D.24-12-025	111.9%
All Districts	Pension Balancing Account	(1,563,136)	(66,220)	D.24-12-025	99.5%
Central Division	Monterey San Clemente Dam Project Balancing Account	(55,606,087)	(6,332,432)	D.24-12-025	94.3%
All Districts	Conservation Balancing Account	(9,124)	1,850,760	AL 1459	274.2%
All Districts	WRAM/MCBA	(2,974,551)	(3,598,604)	AL 1439-1441	% Differential
Central Division	Monterey WW Purchased Power Balancing Account	184,582	105,938	D.24-12-025	91.8%
Central Division	Monterey Seaside Groundwater Basin Balancing Account	(16,682)	203,091	D.24-12-025	79.9%
All Districts	Consolidated Expense Balancing Account - All District	(4,713,446)	(1,953,488)	D.24-12-025	107.2%

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				t Conducted view	
Central Division	Garrapata SDWSRF Loan Repayment Balancing Accounts	(23,062)	(114,813)	W-4788	360.4%
All Districts	Customer Assistance Program (CAP) Balancing Account	416,918	(5,799,415)	AL 1459	96.6%
All Districts	Group Insurance	2,388,255	(562,859)	D.24-12-025	86.0%
Northern Division	Fruitridge SDWSRF Loan Repayment Balancing Accounts - D.06-04-073	(109,869)	(3,272,505)	D.19-12-038	100.0%
Northern	Fruitridge SDWSRF Loan Repayment Balancing				
Division	Accounts - D.10-05-043	(234,813)	(1,675,811)	D.19-12-038	86.0%
Northern Division	Hillview Water Treatment Balancing Account	0	52,513	D.24-12-025	-100.0%
	East Pasadena Purchase				
Southern	<b>Power and Pumping</b>				
Division	Balancing account	(0)	(266,437)	D.24-12-025	100.0%
Southern	East Pasadena Pumping	(0)	(250.752)	D 24 42 025	100.00/
Division	Balancing Account	(0)	(350,753)	D.24-12-025	100.0%

<sup>\*</sup>The authorized revenue requirement reflected in this table is the 2022 Cost of Capital and Trigger Implementation.

(2) Balancing accounts with an authorized revenue amount that is in the top 25<sup>th</sup> percentile of all balancing accounts.

RESPONSE: California American Water interprets "authorized revenue amount" to be the most recent amount authorized for recovery in California American Water's last General Rate Case (D.24-12-025), or the most recently reviewed balance as designated below. The following table lists the accounts with the largest authorized balances (i.e. top 25<sup>th</sup> percentile).

Table 2

District	Balancing Account	Authorized	Balance
		Balance	Reviewed In
Central	Monterey San Clemente Dam Project	(55,606,087)	2024
Division	Balancing Account		

(3) Balancing accounts that have experienced volatile fluctuations in their quarterly balances over time.

RESPONSE: California American Water interprets this request as identifying those accounts that have experienced fluctuations of 20 percent *or more* relative to the previous semiannual balance, for account balances greater than \$5,000:

Table 3

District	Balancing Account	Fluctuation from Previous Annual Balance (%)
All Districts	OPEB Balancing Account	-756.8%
All Districts	Pension Balancing Account	24.1%
All Districts	Conservation Balancing Account	19802.8%
All Districts	WRAM/MCBA	-428.9%
Monterey WW	Monterey WW Purchased Power Balancing Account	-56.0%
Monterey	Monterey Seaside Groundwater Basin Balancing Account	1209.5%
All Districts	Customer Assistance Program (CAP) Balancing Account	-242.5%
All Districts	Group Insurance	33.5%
Hillview	Grant Tax Balancing Account	46.0%

(4) Balancing accounts that have not been reviewed in the previous three years.

RESPONSE: All of California American Water's balancing accounts were either reviewed in its most recent approved general rate case (D.21-11-018) or in advice letter filings within the previous three years.

(A) The amounts shown are preliminary and have not been audited by the

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Company's independently registered public accounting firm.

<u>Utility Name</u>	Balancing Account Name	Balancing Account  Description	Authorizing Decision or Resolution or Advice Letter	Balance as of Jun 2024	Balance as of Dec 2024	Date Last Reviewe d	Most Recent Conducted Review/Audit (either GRC or other Method)	Notes or Comments
California American Water	OPEB Balancing Account - All Districts*	Other-Post- Employment Benefits Balancing Account, tracks the difference between Commission- authorized OPEB related, costs and actual payments.	AL 862 & D.10.06.038; June 24, 2010; D.12.06.016; June 7, 2012	\$2,444,728	\$285,336	2024	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024, 2025, and 2026 Revenue Requirement for California American Water Company dated December 6, 2025	Overcollection
	Pension Balancing Account - All Districts*	Tracks the difference between Commission-authorized pensions and actual required ERISA payments-including payments to avoid at risk status.	AL 862 & D.10.06.038; June 24, 2010; D.12.06.016; June 7, 2012	\$(1,185,902)	\$(1,563,136)	2024	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024,2025, and 2026 Revenue Requirement for California American Water Company dated	Undercollection

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							December 6, 2025	
	Monterey San Clemente Dam Project Balancing Account	Tracks authorized costs transferred from the prior memorandum account, actual expenditures for the project, interest at the authorized cost of capital, and any surcharge recoveries collected.	AL 955 and D.12.06.040; June 21, 2012;	\$(56,700,40 3)	\$(55,606,08 7)	2024		Undercollection
	Conservation Balancing Account - All Districts	Track conservation- related expenses and surcharges associated with California American Water's conservation efforts	D.12.06.016; June 7, 2013	\$1,797,650	\$(9,124)	2024	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024,2025, and 2026 Revenue Requirement for	Undercollection

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Utility Name	Balancing Account Name	Balancing Account Description	Authorizing Decision or Resolution or Advice Letter	Balance as of Jun 2024	Balance as of Dec 2024	Date Last Reviewe d	Most Recent Conducted Review/Audit (either GRC or other Method) California American Water Company dated December 6, 2025	Notes or Comments
	WRAM/MCBA - All District	Tracks the difference between recorded and Commission authorized water revenues and differences between recorded and Commission authorized amounts for purchased water, power, and pump taxes. Amounts are subject to revision for Interim Rate True Ups and other ongoing proceedings.	D.08.11.023; November 6, 2008 & AL 1004	\$(15,733,84	\$(2,974,551)	2024	Advice Letters 1439, 1440, and 1441	Undercollection

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	Monterey WW Purchased Power Balancing Account*	Tracks differences in purchased power expenses based upon changes in recorded unit prices versus adopted I the Monterey Waste Water district.	D.12.06.016; June 7, 2012	\$287,909	\$184,582	2024		Overcollection
	Monterey Seaside Groundwater Basin Balancing Account	Tracks costs associated with Administrative and other payments made to the Seaside Basin Water Master, as well as recovery of such payments from customers in the Monterey County District.	D.12.06.016; June 7, 2012	\$185,095	\$(16,682)	2024	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024,2025, and 2026 Revenue Requirement for California American Water Company dated December 6, 2025	Undercollection

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	Consolidated Expense Balancing Account - All District	Consolidate the amortization of Commission approved balancing and memorandum accounts where appropriate.	"D.12.06.016; June 7, 2012; AL 963, AL964, AL965, AL966, AL 982, AL 986- A, AL 1000, AL 1230, AL 1353"	\$(3,858,396)	\$(4,713,446)	2024	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024,2025, and 2026 Revenue Requirement for California American Water Company dated December 6, 2025	Undercollection
	Garrapata SDWSRF Loan Repayment Balancing Accounts	Track recovery of the balance on SDWSRF loan provided under the America Recovery and Reinvestment Act.	Res. W-4788	\$(22,534)	\$(23,062)	2022	AL 1091/D.18.12.02 1	Undercollection

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	Customer Assistance Program (CAP) Balancing Account - All Districts	Track CAP discounts provided, the CAP surcharges collected and to adjust the CAP surcharges on January 1 of each year.	D.18-12-021	\$1,428,007	\$416,918	2024	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024,2025, and 2026 Revenue Requirement for California American Water Company dated December 6, 2025	Overcollection
	Group Insurance - All District	Track the difference between total requested net group insurance costs on a peremployee basis and the actual level of new group insurance costs incurred on a peremployee basis.	D.18-12-021, AL 1229, March 21, 2019	\$1,588,632	\$2,388,255	2024	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024,2025, and 2026 Revenue Requirement for California American Water Company dated December 6,	Overcollection

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<u>Utility Name</u>	Balancing Account Name	Balancing Account Description	Authorizing Decision or Resolution or Advice Letter	Balance as of Jun 2024	Balance as of Dec 2024	Date Last Reviewe d	Most Recent Conducted Review/Audit (either GRC or other Method)	Notes or Comments
							2025	
	Drinking Water Fees Balancing Account - All District	The purpose of the Drinking Water Fees Balancing Account (DWFBA) is to track the difference between all actual drinking water fees charged by the State Water Resources Control Board (State Water Board) and the drinking water fees authorized in rates.	Res. W-4698 AL 1428	\$-	\$-	2023	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024,2025, and 2026 Revenue Requirement for California American Water Company dated December 6, 2025	No Collection
	Hillview SDWSRF Loan Repayment Balancing Accounts	Track recovery of the balance on SDWSRF loan	D. 19-11-003, Nov 2019, Advice Letter 1299-A	\$(134,405)	\$(134,408)	2022	D.19-11-003	Undercollection
	Fruitridge SDWSRF Loan Repayment Balancing	Track recovery of the balance on SDWSRF loan D. 06-04-073	D. 19-12-038, December 23, 2019, Advice letter	\$(109,866)	\$(109,869)	2022	D.19-12-038	Undercollection

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	Accounts		1279-A					
	Fruitridge SDWSRF Loan Repayment Balancing Accounts	Track recovery of the balance on SDWSRF loan D. 10-05-043	D. 19-12-038, December 23, 2019, Advice letter 1279-A	\$(234,807)	\$(234,813)	2022	D.19-12-038	Undercollection
	Hillview Water Treatment Balancing Account		D. 19-11-003, Nov 2019, Advice Letter 1299-A	\$52,513	\$0	2024	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024,2025, and 2026 Revenue Requirement for California American Water Company dated December 6, 2025	Overcollection

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<u>Utility Name</u>	Balancing Account Name  Hillview Grant	Balancing Account Description	Authorizing Decision or Resolution or Advice Letter W-5190	Balance as of Jun 2024 \$23,971	Balance as of Dec 2024	Date Last Reviewe d	Most Recent Conducted Review/Audit (either GRC or other Method) D.19-11-003	Notes or Comments  Overcollection
	Tax Balancing Account		W-3190	\$23,971	\$44,391	2022	D.19-11-003	Overcollection
	East Pasadena Purchase Power Balancing Account*	East Pasadena Acquisition	D.21-08-002, September, 2021, Advice Letter 1347	\$(309,294)	\$(0)	2024	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024,2025, and 2026 Revenue Requirement for California American Water Company dated December 6, 2025	Undercollection
	East Pasadena - Pumping Balancing account*	East Pasadena Acquisition	D.21-08-002, September, 2021, Advice Letter 1347	\$(420,159)	\$(0)	2024	CPUC D.24-12- 025 on Balancing and Memorandum Accounts, adopting the 2024,2025, and 2026 Revenue	Undercollection

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Utility Name	Balancing Account Name	Balancing Account  Description	Authorizing Decision or Resolution or Advice Letter	Balance as of Jun 2024	Balance as of Dec 2024	Date Last Reviewe d	Most Recent Conducted Review/Audit (either GRC or other Method)	Notes or Comments
							Requirement for California American Water Company dated December 6, 2025	
*Includes corr	ection to 6/2024 b	alance of OPEB Balanc	cing Account					
				\$ (70,901,104)	\$ (62,065,697)			
Revenue Requirement	Northern Division	Authorized Requirement	1424 2024 Water Cost of Capital Adjustment Mechanism	\$ 81,963,699	\$ 81,963,699			
	Central Division		1424 2024 Water Cost of Capital Adjustment Mechanism	\$ 81,859,918	\$ 81,859,918			
	Southern Division		1424 2024 Water Cost of Capital Adjustment Mechanism	\$ 133,673,999	\$ 133,673,999			

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Utility Name	Balancing Account Name	Balancing Account Description	Authorizing Decision or Resolution or Advice Letter	Balance as of Jun 2024	Balance as of Dec 2024	Date Last Reviewe d	Most Recent Conducted Review/Audit (either GRC or other Method)	Notes or Comments
	Monterey Wastewater		1424 2024 Water Cost of Capital Adjustment Mechanism	\$ 3,883,625	\$ 3,883,625			
	All Districts			\$ 301,381,242	\$ 301,381,242			
Service Connections <sup>2</sup>	San Diego			22,798	22,798			
	Los Angeles			36,138	36,138			
	Ventura			24,094	24,094			
	Monterey			44,036	44,036			
	Monterey WW			2,574	2,574			
	Sacramento			76,467	76,467			
	Larkfield			2,674	2,674			
	Dunnigan WW			166	166			

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	Geysersville (included in Sacramento)			-	-			
	Meadowbrook (included in Sacramento)			-	-			
	Dunnigan (included in Sacramento)			-	-			
	Fruitridge (included in Sacramento)			-	-			
	Hillview (included in Sacramento)			-	-			
	Rio Plaza (included in Los Angeles)			-	-			
	East Pasadena (inlcuded in Los Angeles)			-	-			
	All Districts			208,947	208,947			

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