

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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06-05-08
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Application of California-American Water
Company (U210W) For an Authorized
Cost of Capital for Utility Operations for
2009

A.08-05-003

Filed May 1, 2008

**PROTEST OF THE MONTEREY PENINSULA WATER MANAGEMENT
DISTRICT TO THE APPLICATION OF CALIFORNIA-AMERICAN
WATER COMPANY FOR AN AUTHORIZED COST OF
CAPITAL FOR UTILITY OPERATIONS FOR 2009**

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Date: June 5, 2008

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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I. INTRODUCTION

Pursuant to Rule 2.6 of the California Public Utilities Commission's ("CPUC" or "Commission") Rules of Practice and Procedure, the Monterey Peninsula Water Management District ("MPWMD" or "Water Management District") files its Protest to Application ("A.") 08-05-003, wherein California-American Water Company ("California-American") seeks an authorized cost of capital for utility operations for 2009.

The Application raises several areas of concern which merit further investigation and require evidentiary hearings.

II. BACKGROUND

On May 1, 2008, California-American filed A.08-05-003 for an authorized cost of capital for utility operations for 2009. The request was for a capital structure of approximately 58% debt and 42% common equity, a cost of debt of 6.48%, a return on common equity of 11.5%, and a weighted average return on rate base of 8.59%, all of

which California-American considers reasonable. A request was also made to bifurcate the proceeding so that a second phase addresses the method by which multi-district Class A water utilities including California-American can update their authorized capital structures until the next cost of capital proceeding in 2011.

MPWMD was created by special legislation in 1977¹ and approved by the voters in 1978. The Water Management District is governed by an elected Board of Directors and is the sole authority for integrated management of the ground and surface water resources within the Monterey Peninsula area encompassing the waters of the Carmel River System and the Seaside Groundwater Basin.

All water resources used by California-American are under restrictions. The Carmel River System is subject to State Water Resources Control Board ("SWRCB") Order No. WR 95-10 ("Order 95-10"). This Order limits current California-American extractions to 11,285 acre-feet per year ("AFY"). The SWRCB also issued a draft Cease and Desist Order against California-American on January 15, 2008. Hearings on that matter commence June 19, 2008, the effect of which could further constrain California-American water production.

The Seaside Groundwater Basin was adjudicated in 2006 establishing specific production allocations which must be reduced to eliminate the existing overdraft and potential for seawater intrusion.² California-American ratepayers face costly "replenishment assessments" annually for the current production limits. An outstanding

¹ The Monterey Peninsula Water Management District Law, Statutes of 1977, Chapter 527 (as amended), found at West's Water Code Appendix, Chapter 118.

² *California American Water v. City of Seaside, et al.*, Monterey County Superior Court, Case No. M66343.

balance exceeding \$10.6 million is due to the Seaside Basin Watermaster.³ In addition, California-American has contracted for replacement purchased water, some of which costs an extraordinary \$3350 per acre-foot.

In addition to these water resource constraints, California-American's Monterey District is also facing aging mains, production wells, and other infrastructure whose replacement has been under funded for decades, silt-laden reservoirs which are either seismic hazards or hold a fraction of their original water, recently acquired subsystems requiring extensive capital improvements, and major water supply replacement projects.

California-American has previously argued that its Monterey District has more risk than its other districts requiring a higher cost of capital and has prevailed with this argument in the past. While it has not requested a higher cost of capital for its Monterey District in this proceeding, MPWMD will focus its protest on the justification for a lower cost of capital. Specifically, MPWMD will show through testimony and exhibits that the past decisions by California-American management have led to the current water system conditions which must be taken into consideration in this decisionmaking process. Shareholders should not be rewarded with a high return on equity and plump dividend checks when the profits were derived from illegal water sources, resulted in basin overdrafting, and allowed the basic infrastructure to deteriorate to a point where almost everything requires replacement.

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³ California-American can request credit against the replenishment assessment for its water supply project (planning) expenditures that "has or will result in replenishment of the Basin" (*California American Water v. City of Seaside, supra*, at page 41) subject to approval by the Watermaster.

III. DISCUSSION

In D.06-11-050 on California-American's 2005 general rate case ("GRC") filing, the cost of capital for the Monterey District was not consolidated. A settlement between California-American and the Division of Ratepayer Advocates ("DRA") agreed upon an imputed capital structure of 56.6% debt and 43.4% equity for the period 2006 through 2008. A consolidated rate would have resulted in a debt between 59.41% and 59.36%.⁴ The cost of debt was settled at 6.98%, the cost of equity at 10.10% ("ROE"), and a weighted average cost of 8.33%.

In California-American's recent GRC Application 08-01-027, for the period 2009 through 2011, it has requested a 120% total overall revenue increase. The major driver of this request is capital investment estimated at 62% of the total increase. There are fewer than 40,000 connections to "support" these investments. Rate base is expected to increase from an estimated \$104,893,000 in 2008⁵ to \$234,979 by 2011.

Given this history, the current proposed capital structure with debt at 58% is an improvement. MPWMD specifically protests the return on equity at 11.5% which also affects the return on rate base.

GRC Capital Improvements

The GRC proposes plant additions for 2008 through 2010 totaling \$97,427,124.⁶ This includes a major meter replacement effort, two new wells and well rehabilitation, storage tanks and fire protection upgrades (hydrants), and transmission and distribution

⁴ Decision ("D.") 06-11-050 at 12-13. At the same time, a settlement for the Felton District resulted in 63% debt and 37% equity.

⁵ Application ("A.") 08-01-027, Exhibit A, Chapter 11, Table 2. The recorded weighted average rate base in 2007 was \$95,963,100 per Table 1.

⁶ A.08-01-027, Exhibit A, Chapter 9, Table 12. California-American lists \$29,900,143 in 2009 and \$40,648,516 in 2010.

replacement. Some of these improvements are for acquired small subsystems (Ryan Ranch, Hidden Hills, and Bishop) with the bulk of the cost paid by California-American's original customers.

California-American also seeks recovery of over \$65 million for expenditures associated with its San Clemente Dam seismic retrofit or some alternative⁷ for a facility which stores about 100 acre-feet of water and will be similarly useless if buttressed or removed.

Coastal Water Project

In a separate application, A.04-09-019, California-American is proposing its Coastal Water Project ("CWP") consisting of a desalination plant in Moss Landing, distribution system to bring the product water south into its service area, and an Aquifer Storage and Recovery ("ASR") Project. The CWP would produce about 11,730 AFY to replace existing supplies. The Commission has already approved over \$9.3 million in pre-construction expenses⁸ which are being surcharged to ratepayers, but the ultimate project to be placed in rate base could easily exceed \$150,000,000.

These illustrations evidence the large financial burden being faced by Monterey District ratepayers who are impacted by the cost of capital authorized in this proceeding. Many of these expenses could have been avoided or reduced had California-American's past management been more responsive to its operations. A mismanagement penalty would afford some relief to ratepayers. MPWMD will provide testimony to support this position.

⁷ A.08-01-027, Exhibit A, Chapter 9, Tables 2 and 2A.

⁸ See D.06-12-040 and D.08-01-007.

Even if California-American's total capital request is reduced in the GRC, it will still be substantial. A high ROE rewards shareholders who have enjoyed regular dividends at the expense of a mismanaged, deteriorating system. The GRC will not determine the cost of capital – only this proceeding will make that determination. Therefore, it is appropriate for MPWMD to protest this application to secure relief for California-American Monterey District ratepayers.

IV. CONCLUSION

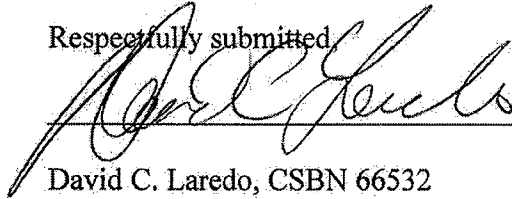
California-American's cost of capital application has impacts on its Monterey District which are unique from its other districts. Extraordinary capital expenditures are proposed in its current GRC and CWP filings and past management decisions have led to a system with a deficient water supply, aging infrastructure throughout, and the need for massive capital improvements. Only this proceeding will determine the capital structure of debt to equity ratio, the appropriate return on common equity, and the weighted average return on rate base. It is, therefore, appropriate to consider MPWMD's protest in this proceeding.

MPWMD will conduct discovery to develop its testimony and recommendations. We concur that evidentiary hearings are required and find Judge Long's proposed Phase I Schedule acceptable as set forth in his May 22, 2008 ruling. Resolution of Phase I issues should preclude the necessity of our participation in Phase II to adopt an up-date mechanism for subsequent years.

Since MPWMD has not completed discovery nor filed testimony, it reserves the right to assert any issue discovered after this Protest is filed.

For the reasons stated above, MPWMD shall participate as a protestant in the full scope of the proceeding.

Respectfully submitted,



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VERIFICATION

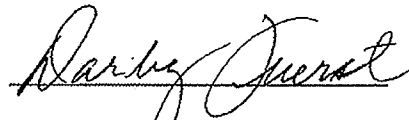
I, Darby Fuerst, declare:

I am the General Manager of the Monterey Peninsula Water Management District and am authorized to make this Verification for and on its behalf, and I make this Verification for that reason.

I have read the above document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

Executed on June 5, 2008, at Monterey, California.

I declare under penalty of perjury that the foregoing is true and correct.


Darby Fuerst

CERTIFICATE OF SERVICE

I, Wanda Gooch, declare as follows:

I am employed in the City of Pacific Grove and County of Monterey, California. I am over the age of eighteen years, and not a party to the within cause; my business address is De LAY & LAREDO, 606 Forest Avenue, Pacific Grove, California 93950. On June 5, 2008, I served the within:

PROTEST OF THE MONTEREY PENINSULA WATER MANAGEMENT DISTRICT TO THE APPLICATION OF CALIFORNIA-AMERICAN WATER COMPANY FOR AN AUTHORIZED COST OF CAPITAL FOR UTILITY OPERATIONS FOR 2009

on the interested parties in this action addressed as follows:

Please see attached Service List

- (BY OVERNIGHT COURIER) By placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal Express agent for delivery.
- (BY MAIL) By placing such document(s) in a sealed envelope, with postage thereon fully prepaid for first class mail, for collection and mailing at De Lay & Laredo, Pacific Grove, California following ordinary business practice. I am readily familiar with the practice being that in the ordinary course of business, correspondence is deposited in the United States Postal Service the same day as it is placed for collection.
- (BY E-MAIL SERVICE) By transmitting such documents electronically from De Lay & Laredo, Pacific Grove, California, to the electronic mail addresses list above. I am readily familiar with the practice of De Lay & Laredo for transmitting documents by electronic mail, said practice being that in the ordinary course of business, such electronic mail is transmitted immediately after such document has been tendered for filing. Said practice also complies with Rule 2.3(b) of the Public Utilities Commission of the State of California and all protocols described therein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on June 5, 2008, at Pacific Grove, California.



Wanda Gooch

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