

APPENDIX B

ATTACHMENTS TO DRA'S REPORT ON THE RESULTS OF OPERATIONS

San Gabriel Valley Water Company
Fontana Water Company Division
General Rate Case A.11-07-005
Test Year 2012-2013

ATTACHMENT 12-1
(for Chapter 12 of DRA's Report)

San Gabriel's Response to DRA's Data Request
MA1-001

SAN GABRIEL VALLEY WATER COMPANY

October 20, 2011

Ms. Chari Worster
Division of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

by e-mail and US Mail

Subject: **A.11-07-005 Email Data Request**

Dear Ms. Worster:

San Gabriel provides the following response to the subject email data request:

- REQUEST:** On Attachment C of Larry Magallanes's Direct Testimony, does the "Adopted Residential Customer (1" or less)" exclude LI customers? Does it exclude or include residential customers who receive service through a master meter? Is the Adopted Residential Customers the group of non low-income customers who are charged a surcharge to fund the low income program?
RESPONSE: No, "Adopted Residential Customer (1" or less)" on Attachment C includes low-income customers. Yes, it does include master meter customers. Finally, there is no surcharge to fund the CARW program. Rather, the estimated cost of the CARW program has been built into the rate design since August 2005 when the CARW program was initiated.
- REQUEST:** Water utilities use the same enrollment process as the CARE program in place for energy utilities. The CARE program has the customer submit the application, which the utility reviews. Re-certification takes place every two years. Verification is random. Is this an accurate description of SGVWC's low income enrollment process?
RESPONSE: Yes.
- REQUEST:** What kind of verification does SGVWC do, how many/how often are random checks done per year, and what percentage of low income customers are randomly checked? What is the level of fraud/ ineligibility uncovered by checks?

RESPONSE: San Gabriel annually sends out to all of its customers the CARW application with updated income criteria for self-certification by new and continuing CARW customers. Occasionally, the company will discover that a CARW customer is not living at the service address or has more than one residence, thereby disqualifying them from the CARW program. However, the company has neither the expertise nor resources to completely verify the information provided by the customer (for example, the customer may present pay stubs for only a portion of the household income or may misrepresent the number of persons actually residing in the household) and so is unable to detect most fraud/ineligibility.

4. **REQUEST:** D1105020 on data sharing between energy and water utilities was issued in May, 2011. Has SGVWC already begun receiving / sharing data with energy utilities? If yes, how has the data sharing influenced the low income participation rate? What percentage of customers return opt-out letters to prevent automatic enrollment in low income programs?

RESPONSE: San Gabriel has not yet begun implementing data sharing with energy utilities. It is still developing its plan that must be filed with the Commission on November 10, 2011 in compliance with D.11-05-020, Ordering Paragraph 4.

Please call me at (626) 774-2251 with any questions regarding this response.

Sincerely,



Daniel A. Dell'Osa
Director, Rates & Revenue

Attachments

cc: Martha Perez - Legal Division
Martin Mattes - Nossaman LLP
Kendall MacVey – Best, Best & Krieger LLP

ATTACHMENT 12-2
(for Chapter 12 of DRA's Report)

Water Utilities Low-Income Program Participation

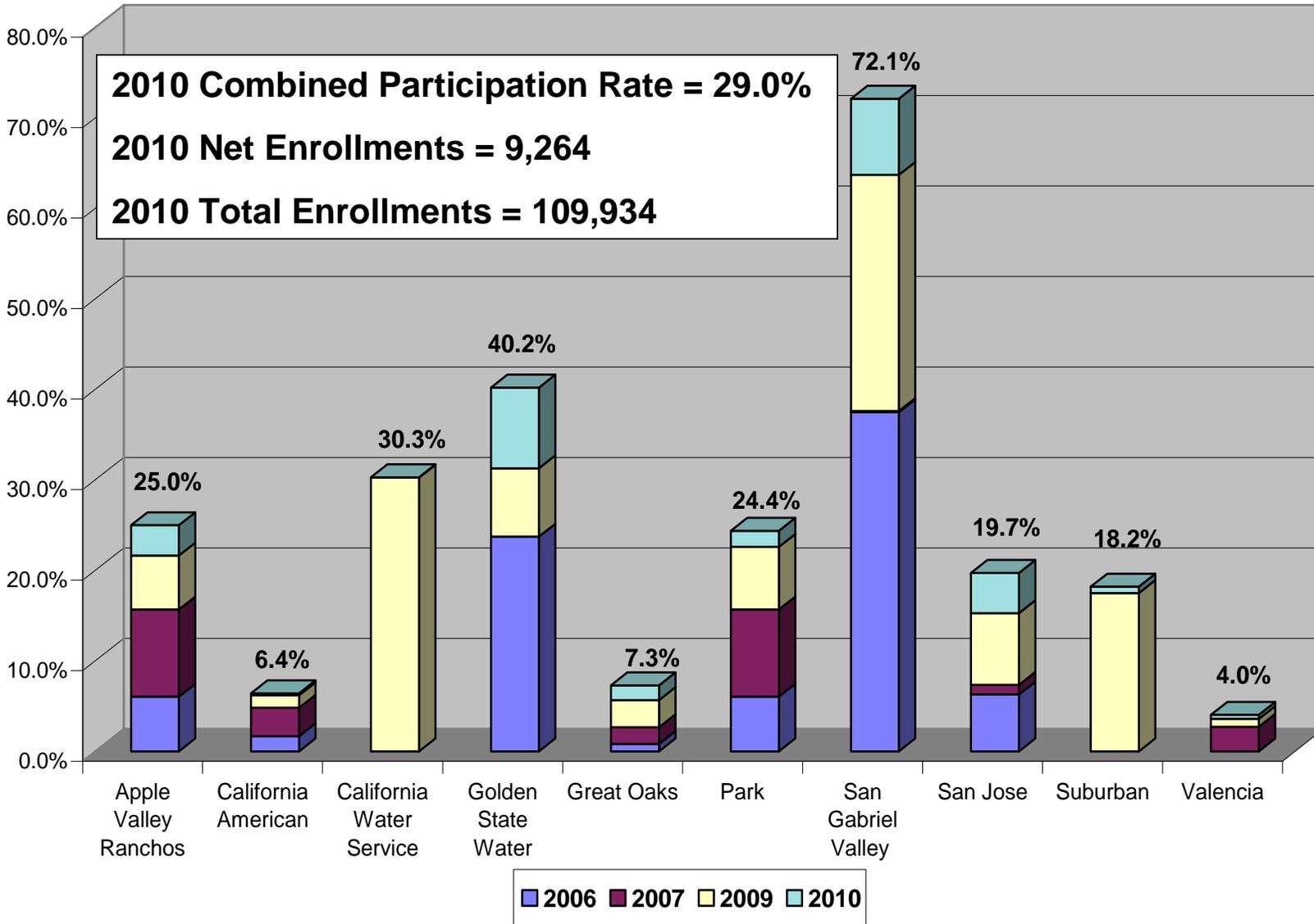
Update: Water Utilities Low-Income Program Participation

LIOB Meeting – September 2011

Carolina Contreras

CPUC – Division of Water and Audits

Water Utility Low-Income Participation Rates for Year 2010



ATTACHMENT 12-3
(for Chapter 12 of DRA's Report)

DRA's 2011 California Low-Income Programs
Brochure

A COMPARISON OF LOW-INCOME PROGRAMS

FREE SERVICES & ENERGY RESOURCE

LIEE electric & gas	
<ul style="list-style-type: none"> Free in-home energy audit & conservation education If needed, free home weatherization & energy efficient appliances For owners & renters, small landlord co-pay for some services 	
Participant Savings	Ratepayer Cost (res) ³
\$20-\$52 1st year	\$0.22-\$0.42 monthly
\$153-\$513 lifecycle	
Energy Savings 90GW 5.1 MMTh	
2010 enrollment: 383,623	

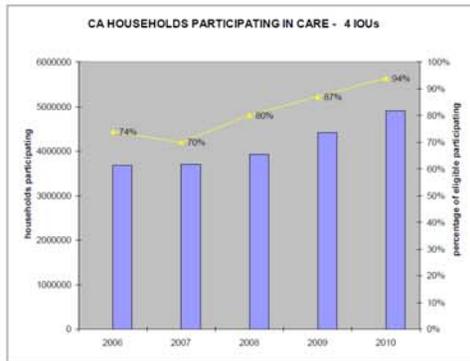
CSI - Single Family Affordable Solar Housing (SASH)	
<ul style="list-style-type: none"> Incentives \$3-\$5/Watt greater than residential Free 1-1.2kW PV system for 1,800 households Incentive amount based on fed taxable income & CARE eligibility 	
Participant Savings	Ratepayer Cost (res) ³
\$4.75-\$7 Watt for 5,000 homes	\$1.60/yr
all electric costs for 1,800 homes	
as of 4/11/2011	Energy Savings 1.2 MW
466 installations completed as of 4/11/2011	

CSI - Multifamily Affordable Solar Housing (MASH)	
<ul style="list-style-type: none"> Budget for MASH incentives of \$108 million Incentives between \$3.30-\$4.00 / Watt for Track 1 As of May 31, 2011 MASH has 71 completed projects with a capacity of 4.1 MW 	

Additional Assistance Programs For Utility Customers

- Medical Baseline and Life Support Program (no shut-off allowed, lower rates)
- One-time emergency bill-payment assistance (PG&E: REACH, SCE: Energy Assistance Fund, SDG&E: Neighbor-to-Neighbor, SoCalGas: Gas Assistance Fund)
- Third-Party Notification (have a friend or relative receive a warning if you overlook paying your bill)
- LIHEAP-federally funded (more free home weatherization & energy bill payment assistance)
- Payment Programs (spread payments over time or equalize payments)
- Home Energy Audits, Energy Conservation Education, Rebates for Appliances
- Summer Discount Plans: discount for allowing the company to lower usage on hottest days
- Cool Zones: cooled buildings for relief on hot summer days and to reduce air conditioning use

Listing of Companies and Contact Information for many of these CA programs, as well as for municipal utility programs, can be found online at:
<http://liheap.ncat.org/profiles/California.htm>



CALIFORNIA LOW-INCOME PROGRAMS



A COMPARISON OF LOW-INCOME PROGRAMS

BILL DISCOUNTS

CARE electric & gas		
<ul style="list-style-type: none"> 20% off rates High electric usage (Tiers 4-5) charged at Tier 3 rate¹ Exemption from CARE & CSI surcharges 		
	Participant Savings	Ratepayer Cost (res) ²
Electric	\$12-\$42	\$0.91-\$3.07
Gas	\$5-\$7	\$0.75-\$1.11
2010 enrollment: 4,888,533		

FERA electric		
<ul style="list-style-type: none"> Reduced rate for large households with higher than average electricity use For households of 3 or more 		
Average Monthly per Household	Participant Savings	Ratepayer Cost (res) ³
	\$9-\$20	\$0.01
2010 enrollment: 56,135		

LIFELINE landline phone	
<ul style="list-style-type: none"> \$5.47 - \$6.84 basic service, \$10 connection fee⁴ Exemption from all CA & fed telco surcharges (Lifeline, DDTP, CTF, CASF, CHCF-A&B) 	
Participant Savings	Ratepayer Cost (all) ⁵
\$5.47 (unlimited local calls) AND \$6 off fed surcharges	1.15% of instate bill
2010 enrollment: 1,777,952	

Class A WATER		
<ul style="list-style-type: none"> % discount varies by water company Most programs began 2005 or 2006 Exemption from water low-inc surcharge 		
Average Monthly per Household	Participant Savings	Ratepayer Cost (res) ⁵
	\$3-\$25	\$0.39/month
2010 enrollment: 111,631		

¹As of June 2011, PG&E, SCE and SDG&E Tier 3 is the highest CARE rate
²Based on 2010 ratepayer cost
³Based on 2007 ratepayer cost
⁴\$5.47-\$6.84 flat rate basic service, \$2.99-\$3.66 measured rate per Decision 10-11-033
⁵Based on 2010 ratepayer cost

CAN COORDINATION & INTEGRATION

- improve the customer experience?
- lower the cost of delivering services?

	Program	Eligibility		Marketing, Education & Outreach		Enrollment				How To Enroll		Funding		
		Household Income (6/1/11 - 5/31/12)	Program Enrollment	Administration	Key Strategies	Administration	Certification	Re-certification	Verification	Phone	Online			
TELECOMMUNICATIONS	LIFELINE ¹	Landline bill discount (basic service & connection)	1, 2 members - \$24,000 annual income 3 - \$28,200 4 - \$34,000 Each additional - \$5,800 Not tied to FPL. Changes annually for CPI.	Medi-Cal, Food Stamps, TANF (incl. Tribal), WIC, LIHEAP, Healthy Families Category A SSI, Medicaid, Federal Public Housing Assistance/Section 8, NSL FREE Lunch Program, Bureau of Indian Affairs General Assistance, Head Start Income Eligible (Tribal only)	Carrier and 3rd Party Statewide Administrator: Solix	Print media and outreach events Over the phone enrollment	3rd Party Administrator (Statewide)	1. Customer submits application with income documentation, unless program eligible (pre-qual pending in R.04-12-001) 2. 3rd Party Administrator reviews application. 3. Daily "true-up" between 3rd Party Administrator-Carrier customer databases.	Every year	3%	CALL STATEWIDE FOR APPLICATION English: 1-866-272-0349 Spanish: 1-866-272-0350 Laotian/Hmong: 1-866-272-0351 Cambodian: 1-866-272-0352 Tagalog: 1-866-272-0353 Korean: 1-866-272-0354 Vietnamese: 1-866-272-0355 Chinese (Mandarin/ Cantonese): 1-866-272-0356 TTY: 1-866-272-0358 AFTER RECEIVING PINK ENVELOPE ENROLL VIA MAIL OR ONLINE	https://www.californialifeline.com/source/MainPage.aspx	Federal + non-participating customer surcharge for intrastate telecommunications services 2010 Total Budget \$331,303,000	
		ENERGY	CARE ²	Electric & gas bill discount	1, 2 members - \$31,800 annual income 3 - \$37,400 4 - \$45,100 Each additional - \$7,700 200% FPL. Adjusted annually for inflation.	Medi-Cal, Food Stamps, TANF (AFDC), WIC, LIHEAP, Healthy Families Categories A & B	Utility and 3rd Party Contractors	Print media and outreach events Automatic enrollment	Utility	1. Customer submits application. 2. Utility reviews application.	Every 2 years	Random	SDGE: 1-800-411-7343 PG&E: 1-866-743-2273 SoCalGas: 1-800-427-2200 SCE: 1-800-798-5723	http://www.sdge.com/customerassistance/index.html http://www.pge.com/myhome/customer-service/financialassistance/ http://www.socalgas.com/residentialassistance/ http://www.sce.com/residential/income-qualified/CAREFERA/care-fera-rat-program.htm
	LIEE ³		Electric & gas free services	Same as CARE	Utility and 3rd Party Contractors	Print media and outreach events	Utility and 3rd Party Contractors	1. Customer submits utility referral for 3rd party contractor visit. 2. 3rd Party Contractor reviews income documentation during visit, unless program eligible or CARE-audited last year. ⁴			SDGE (Energy Team): 1-866-597-0697 PG&E (Energy Partners): 1-800-933-9555 SoCalGas (Direct Assistance): 1-800-331-7593 SCE (Energy Management): 1-800-736-4777	Customer surcharge 2010 Total Expenses \$302,616,689		
	FERA ⁵		Electric bill discount	minimum 3 members - \$37,401-46,800 annual income Each additional member - \$7,700-9,600 annual income 250% FPL. Adjusted annually for inflation.	Medi-Cal, Food Stamps, TANF (AFDC), WIC, LIHEAP, Healthy Families Categories A & B	Utility and 3rd Party Contractors	Print media and outreach events Automatic enrollment	Utility	1. Customer submits application. 2. Utility reviews application.	Every 2 years	Random	SDGE: 1-800-411-7343 PGE: 1-800-743-5000 SCE: 1-800-447-6620	Amortized in rates 2010 Total Expenses \$10,961,889	
	CSI - Single-Family ⁶		Bill discount AND free service	Must meet definition of "low-income residential housing" for bill discount (incentives) AND must meet definition of "low income residential housing" and have incomes less than or equal to 50% of area median income for free service (1 kW PV system). ⁷		3rd Party Statewide Administrator Grid Alternatives	Print media and outreach events Target LIEE homeowners (D.00-07-020)	3rd Party Administrator (Statewide)	1. Customer submits application. 2. 3rd Party Administrator reviews application with energy efficiency audit.			Grid Alternatives statewide administrator In 2009, establishing offices statewide For more info call 415-355-5586.	http://www.gosolarcalifornia.org/affordable/	
WATER	WATER ⁸	Bill discount	Same as CARE (except Golden State, 75% FPL)	Utility	Print media		Same as CARE			Check water bill for phone number. Programs for: California Water Service, Golden State, California-American, Suburban Water, San Gabriel Valley, Park/Apple Valley, Valencia, Great Oaks, San Jose	Call water company	Non-participating customer surcharge (except California American-Monterey, Sacramento, and Felton Districts: Golden State-Regions I and II: Great Oaks) 2009 Total Expenses \$8,663,323		

Legislation and Policy

¹ Moore Universal Telephone Service Act (AB 1348), 1983
² PUC Code 739.1, 1988. Notably, in 2006, AB 1240 was passed to extend CARE discounts to tenants of master-metered housing.
³ SB 845 (PUC Code 2790), 1990. Notably, in 2001, D.0105-033 mandated installment of all feasible measures, and in 2007, D.07-12-051 required increased LIEE penetration.
⁴ D.06-12-038. California Statewide LIEE Policy and Procedures Manual, 2007-2008 also specifies 80-20 measures require 80% of all multi-family complexes to be LIEE-eligible.
⁵ D.04-02-057, 2004. Offered by PGE, SCE, and SDGE.
⁶ SB 1, 2006 (multi-family program still under development).
⁷ PUC Code 2852 defines "low income residential housing" as households financed with various types of local, state, and federal programs, including loans, grants, and tax-exempt mortgage revenue bonds (also see Health and Safety Code 50079.5). Homeowners may or may not be CARE eligible (D.07-11-045).
⁸ PUC Code 739.8, 1993.

ATTACHMENT 15-1
(for Chapter 15 of DRA's Report)

USGS Gauging Station Schematic Diagram of the
Santa Ana River Basin (which includes Lytle Creek)

and

the 2010 Water Data Reports for the following
related USGS Gauging Stations:

- 11062700 – Fontana Powerplant Tailrace Weir near Fontana, CA
- 11062000 – Lytle Creek near Fontana, CA
- 11062402 – Lytle Creek Surface Diversion near Fontana, CA
- 11062450 – Fontana Powerplant Forebay Spillway near Fontana, CA

Water-Data Report 2010

11062700 Fontana Powerplant Tailrace Weir near Fontana, CA

Santa Ana River Basin

LOCATION.--Lat 34°09'18", long 117°23'43" referenced to North American Datum of 1927, San Bernardino County, CA, Hydrologic Unit 18070203, in Muscupiabe Grant, in Fontana Water Company's water distribution complex, on afterbay from Southern California Edison Company's Fontana Powerplant, and 3.5 mi northeast of Fontana.

SURFACE-WATER RECORDS

PERIOD OF RECORD.--October 1972 to current year. Records for October 1972 to September 2004 available in the files of the U.S. Geological Survey.

GAGE.--Water-stage recorder and sharp-crested weir. Elevation of gage is 1,560 ft above NGVD of 1929, from topographic map.

REMARKS.--Records good. Flow at this station represents outflow from the Fontana Powerplant. See schematic diagram of Santa Ana River Basin available from the California Water Science Center.

EXTREMES FOR PERIOD OF RECORD.--Maximum daily discharge, 60 ft³/s, May 17, 1978; no flow at times in some years.

11062700 Fontana Powerplant Tailrace Weir near Fontana, CA—Continued

DISCHARGE, CUBIC FEET PER SECOND
WATER YEAR OCTOBER 2009 TO SEPTEMBER 2010
DAILY MEAN VALUES

Day	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
1	10	12	13	19	23	26	41	37	26	22	19	18
2	10	12	13	19	31	43	39	36	26	21	19	18
3	10	12	14	18	40	39	38	34	26	21	19	18
4	10	12	13	18	39	46	37	33	25	21	19	18
5	11	12	13	18	39	46	42	33	25	21	19	18
6	11	12	13	17	19	44	42	33	25	21	15	18
7	10	12	11	16	9.1	44	40	33	25	21	7.0	18
8	10	12	9.7	16	9.1	44	38	33	25	21	9.7	19
9	10	12	15	16	8.9	47	36	34	25	21	10	19
10	10	12	16	16	25	46	35	34	26	21	10	19
11	10	12	17	16	40	47	36	33	26	21	11	18
12	11	12	15	16	40	48	15	32	26	21	12	19
13	11	13	8.5	16	40	49	21	31	25	21	16	19
14	13	13	8.3	16	40	49	40	29	25	21	18	19
15	12	13	15	16	41	47	38	28	24	20	18	19
16	11	13	25	16	43	45	37	28	24	20	17	19
17	11	12	27	16	42	45	36	29	24	20	17	19
18	11	12	24	9.7	40	45	35	29	24	17	17	19
19	12	12	22	0.07	40	45	35	28	23	17	17	19
20	12	12	22	0.92	40	45	39	27	23	18	17	19
21	11	12	22	0.06	39	45	44	27	23	18	17	19
22	11	12	22	0.07	40	45	46	27	23	18	17	19
23	11	13	22	0.07	40	45	44	29	23	18	17	20
24	11	12	22	0.02	40	44	41	28	23	17	16	20
25	11	12	22	4.6	40	43	40	27	23	17	16	20
26	11	12	22	14	41	42	38	26	23	12	16	21
27	12	12	21	13	20	42	39	27	23	15	16	21
28	12	13	21	8.8	8.3	41	40	26	23	20	17	21
29	12	13	20	17	---	40	40	27	23	20	17	21
30	12	13	20	23	---	40	39	26	22	20	18	22
31	12	---	19	23	---	41	---	26	---	19	18	---
Total	342	368	547.5	399.31	917.4	1,358	1,131	930	727	601	491.7	576
Mean	11.0	12.3	17.7	12.9	32.8	43.8	37.7	30.0	24.2	19.4	15.9	19.2
Max	13	13	27	23	43	49	46	37	26	22	19	22
Min	10	12	8.3	0.02	8.3	26	15	26	22	12	7.0	18
Ac-ft	678	730	1,090	792	1,820	2,690	2,240	1,840	1,440	1,190	975	1,140

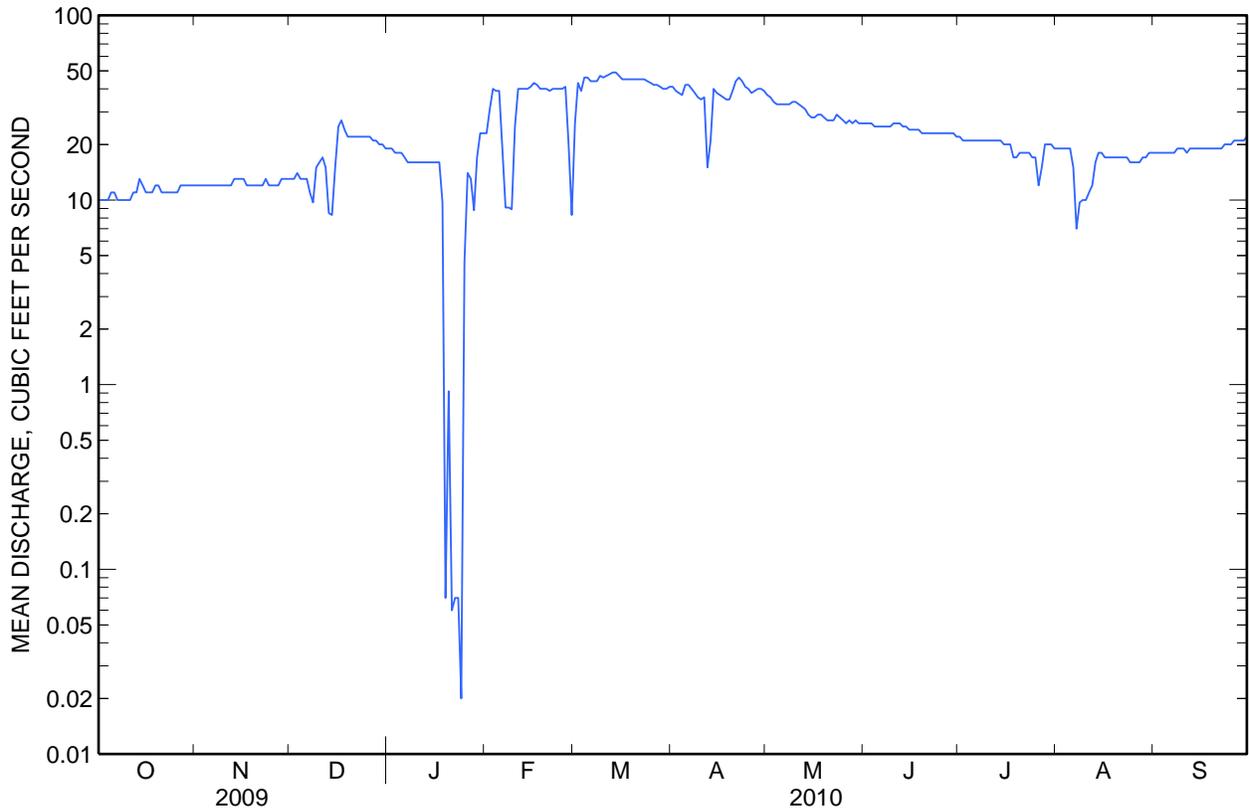
STATISTICS OF MONTHLY MEAN DATA FOR WATER YEARS 1973 - 2010, BY WATER YEAR (WY)

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Mean	20.0	19.5	19.3	19.2	21.0	24.9	26.9	26.4	21.2	20.0	21.4	21.2
Max	44.7	39.0	32.5	34.1	40.5	43.8	54.0	55.2	55.7	55.9	55.2	54.0
(WY)	(1994)	(2006)	(1999)	(1984)	(1997)	(2010)	(1980)	(1980)	(1980)	(1980)	(1980)	(1978)
Min	6.56	7.08	8.09	8.59	6.12	0.61	8.61	11.0	8.70	6.94	6.53	5.88
(WY)	(2003)	(1991)	(1990)	(2003)	(2003)	(1993)	(2005)	(2002)	(2002)	(2002)	(2002)	(2002)

11062700 Fontana Powerplant Tailrace Weir near Fontana, CA—Continued

SUMMARY STATISTICS

	Calendar Year 2009		Water Year 2010		Water Years 1973 - 2010	
Annual total	5,910.9		8,388.91			
Annual mean	16.2		23.0		21.3	
Highest annual mean					40.5	1980
Lowest annual mean					10.5	1990
Highest daily mean	35	Feb 25	49	Mar 13	60	May 17, 1978
Lowest daily mean	6.0	Feb 6	0.02	Jan 24	0.00	Feb 7, 1973
Annual seven-day minimum	9.9	Sep 6	0.83	Jan 19	0.00	Mar 11, 1993
Annual runoff (ac-ft)	11,720		16,640		15,440	
10 percent exceeds	24		41		41	
50 percent exceeds	15		20		18	
90 percent exceeds	10		11		8.8	



11062000 Lytle Creek near Fontana, CA

Santa Ana River Basin

LOCATION.--Lat 34°12'44", long 117°27'26" referenced to North American Datum of 1927, in NW ¼ SE ¼ sec.36, T.2 N., R.6 W., San Bernardino County, CA, Hydrologic Unit 18070203, on right bank, 25 ft upstream from highway culvert crossing, 0.7 mi upstream from right tributary, 2.3 mi downstream from Lytle Creek Conduit, and 8 mi north of Fontana.

DRAINAGE AREA.--46.6 mi².

SURFACE-WATER RECORDS

PERIOD OF RECORD.--October 1918 to current year. Combined records of Lytle Creek and diversions, October 1898 to December 1899, October 1904 to current year (published as "at mouth of canyon near Rialto" 1898-99, as "near San Bernardino" 1904-18, and as "Lytle Creek and Fontana pipeline near Fontana" 1919-31). Monthly discharge only for some periods published in WSP 1315-B.

REVISED RECORDS.--WSP 1011: 1943. WDR CA-83-1: Drainage area. WDR CA-98-1: 1969 (instantaneous maximum discharge).

GAGE.--Water-stage recorder and crest-stage gage on creek. Elevation of gage is 2,380 ft above NGVD of 1929, from topographic map. October 1918 to Mar. 21, 1938, at site 1 mi downstream at different datum. Mar. 22, 1938, to Nov. 20, 1963, at site 75 ft downstream at datum 4.58 ft lower. Water-stage recorder and sharp-crested weir on conduit since June 3, 1949. Water-stage recorder and sharp-crested weir on infiltration line from Oct. 1, 1971, to Sept. 30, 1992; nonrecording flow meter on diversion pipe since Oct. 1, 1992.

COOPERATION.--Records for Lytle Creek Conduit were provided by Southern California Edison Co., under general supervision of the U.S. Geological Survey, in connection with Federal Energy Regulatory Commission project no. 1932. Records for Fontana Water Co.'s infiltration line were provided by Fontana Water Co.

REMARKS.--Records poor. No regulation upstream from station. Southern California Edison Co.'s Lytle Creek Conduit (station 11060900) diverts 2.3 mi upstream for power development and Fontana Water Co. collects water from an infiltration line (station 11061000) upstream for irrigation and domestic use. Abrupt changes in the combined discharge of Lytle Creek and diversions occurs at times, due to changes in diversion, the distances between diversion and gage locations, time of travel, and changes in surface and subsurface storage. Spill can occur from Southern California Edison Co.'s Lytle Creek forebay during unusually high flows. Water can be pumped from channel by two pumps at Miller Narrows at a point approximately 2 mi upstream. No water has been pumped out of channel since 1971. For records of combined discharge of Lytle Creek and diversions, see station 11062001. See schematic diagram of Santa Ana River Basin available from the California Water Science Center.

EXTREMES FOR PERIOD OF RECORD.--Creek only: Maximum discharge, 25,200 ft³/s, Mar. 2, 1938, gage height unknown, on basis of slope-area measurement of peak flow; maximum gage height, 15.0 ft, Jan. 25, 1969; no flow at times most years.

Combined creek and diversions: Maximum discharge, 25,200 ft³/s, Mar. 2, 1938; minimum daily, 2.4 ft³/s, Feb. 2, 7, 2003.

PEAK DISCHARGES FOR CURRENT YEAR.--Peak discharges greater than base discharge of 300 ft³/s and (or) maximum (*):

Date	Time	Creek Only		Combined Creek and
		Discharge (ft ³ /s)	Gage height (ft)	Diversions Discharge (ft ³ /s)
Dec 12	2215	*932	*5.66	*938
Jan 18	1530	794	5.39	799
Feb 6	0945	522	4.79	530
Feb 27	0900	375	4.41	398

11062000 Lytle Creek near Fontana, CA—Continued

DISCHARGE, CUBIC FEET PER SECOND
WATER YEAR OCTOBER 2009 TO SEPTEMBER 2010
DAILY MEAN VALUES

[e, estimated]

Day	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
1	0.01	0.03	0.19	0.00	20	65	e22	18	8.0	3.7	0.00	0.02
2	0.01	0.05	0.16	0.00	19	49	e20	17	8.0	0.79	0.00	0.05
3	0.03	0.05	0.23	0.00	17	e48	e19	16	7.2	0.66	0.00	0.06
4	0.01	0.08	0.28	0.00	15	e51	e18	15	6.5	0.35	0.00	0.12
5	0.00	0.18	0.33	0.00	17	e50	e25	15	5.9	0.15	0.00	0.10
6	0.00	0.40	0.34	0.00	289	e58	e20	15	5.8	0.86	1.1	0.01
7	0.00	0.42	9.7	0.00	180	e51	e16	15	5.8	1.0	6.6	0.00
8	0.00	0.47	11	0.00	136	e52	14	15	5.9	1.0	7.4	0.02
9	0.00	0.49	2.3	0.00	140	e65	14	16	6.0	0.87	7.5	0.03
10	0.00	0.44	1.8	0.00	127	e59	14	16	7.2	0.74	7.1	0.08
11	0.00	0.30	2.5	0.00	113	e54	14	16	6.9	0.93	6.4	0.21
12	0.00	0.13	182	0.00	103	e51	32	15	7.0	0.66	6.0	0.32
13	0.01	0.12	278	0.00	96	e47	24	14	6.5	0.54	3.3	0.37
14	0.15	0.07	92	0.00	89	e44	23	13	5.9	0.66	0.02	0.83
15	0.00	0.17	53	0.00	81	e40	21	12	5.4	0.69	0.01	1.1
16	0.04	0.26	26	0.00	72	e37	20	10	5.6	0.65	0.00	0.76
17	0.03	0.16	10	0.00	61	e34	20	11	5.6	0.64	0.00	0.77
18	0.03	0.11	7.1	130	51	e31	19	12	5.3	1.9	0.00	0.72
19	0.03	0.13	5.2	64	36	e29	19	11	5.1	1.8	0.00	0.93
20	0.04	0.11	2.8	102	32	e27	22	11	5.2	1.3	0.00	0.97
21	0.03	0.06	0.12	193	23	e25	28	12	5.1	2.0	0.00	1.1
22	0.08	0.06	0.09	153	12	e24	27	12	4.8	2.6	0.00	1.8
23	0.09	0.10	0.00	86	2.7	e23	23	13	4.6	2.5	0.00	1.5
24	0.09	0.16	0.00	61	0.00	e22	21	12	4.2	2.3	0.00	1.2
25	0.09	0.15	0.00	44	0.00	e22	19	11	3.9	1.6	0.00	1.6
26	0.09	0.09	0.00	35	0.00	e22	19	10	3.7	6.8	0.00	1.9
27	0.05	0.10	0.00	42	145	e21	19	10	3.2	5.9	0.00	1.5
28	0.08	0.28	0.00	36	91	e21	19	9.3	3.0	0.18	0.00	1.1
29	0.09	0.22	0.00	25	---	e21	19	8.8	3.0	0.03	0.00	1.4
30	0.07	0.18	0.00	18	---	e21	19	8.1	2.9	0.00	0.01	1.6
31	0.05	---	0.00	19	---	e24	---	8.2	---	0.00	0.01	---
Total	1.20	5.57	685.14	1,008.00	1,967.70	1,188	609	397.4	163.2	43.80	45.45	22.17
Mean	0.04	0.19	22.1	32.5	70.3	38.3	20.3	12.8	5.44	1.41	1.47	0.74
Max	0.15	0.49	278	193	289	65	32	18	8.0	6.8	7.5	1.9
Min	0.00	0.03	0.00	0.00	0.00	21	14	8.1	2.9	0.00	0.00	0.00
Ac-ft	2.4	11	1,360	2,000	3,900	2,360	1,210	788	324	87	90	44

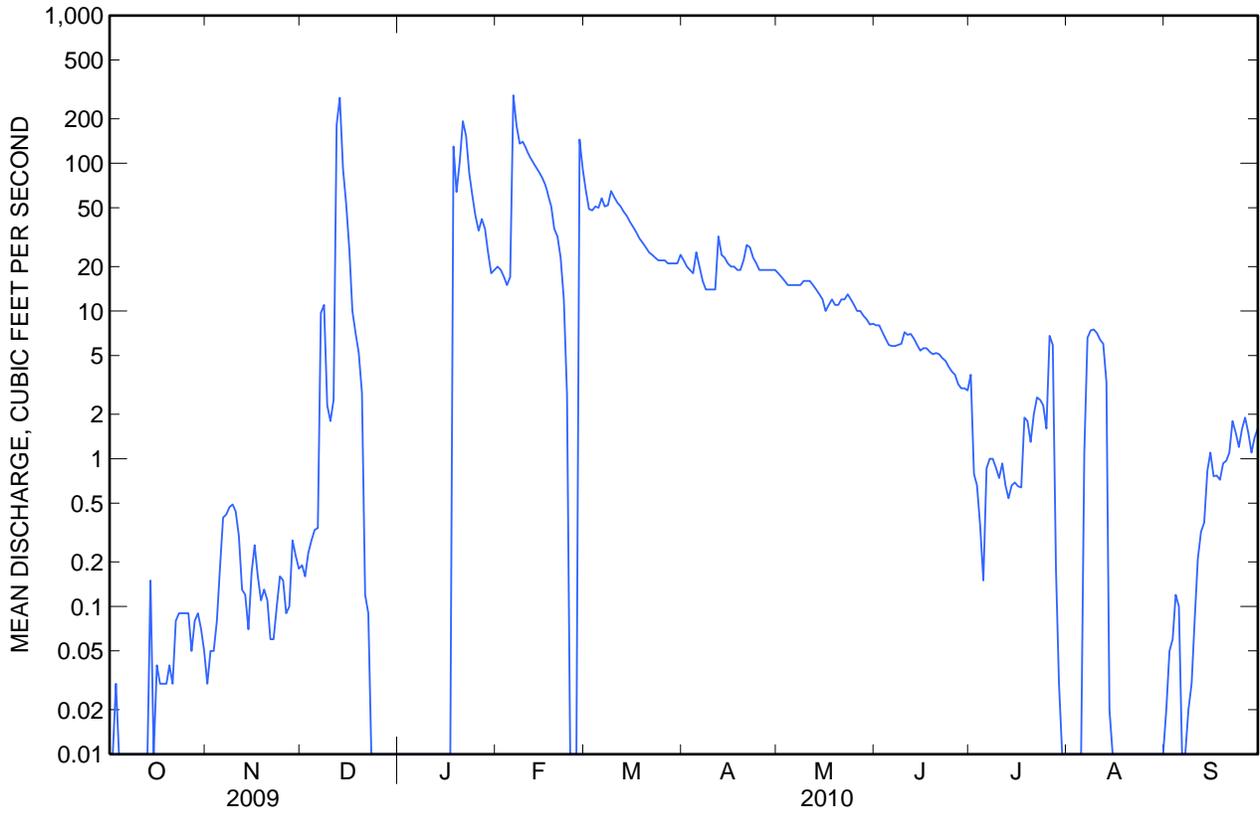
STATISTICS OF MONTHLY MEAN DATA FOR WATER YEARS 1919 - 2010, BY WATER YEAR (WY)

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Mean	4.70	7.63	10.5	29.1	43.7	52.0	29.6	20.5	15.1	11.5	8.03	5.99
Max	48.2	275	151	552	633	752	254	189	157	131	91.7	65.7
(WY)	(1984)	(1966)	(1967)	(1969)	(1980)	(1938)	(1978)	(1993)	(1983)	(1983)	(2005)	(1983)
Min	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
(WY)	(1919)	(1919)	(1919)	(1919)	(1919)	(1919)	(1919)	(1919)	(1919)	(1919)	(1919)	(1919)

11062000 Lytle Creek near Fontana, CA—Continued

SUMMARY STATISTICS

	Calendar Year 2009		Water Year 2010		Water Years 1919 - 2010	
Annual total	1,535.03		6,136.63			
Annual mean	4.21		16.8		19.9	
Highest annual mean					177	1969
Lowest annual mean					0.00	1919
Highest daily mean	278	Dec 13	289	Feb 6	8,950	Mar 2, 1938
Lowest daily mean	0.00	May 2	0.00	Oct 5	0.00	Oct 1, 1918
Annual seven-day minimum	0.00	May 2	0.00	Oct 5	0.00	Oct 1, 1918
Maximum peak flow			932	Dec 12	25,200	Mar 2, 1938
Maximum peak stage			5.66	Dec 12	15.00	Jan 25, 1969
Annual runoff (ac-ft)	3,040		12,170		14,450	
10 percent exceeds	9.9		49		46	
50 percent exceeds	0.04		2.6		0.00	
90 percent exceeds	0.00		0.00		0.00	



Water-Data Report 2010

11062402 Lytle Creek Surface Diversion near Fontana, CA

Santa Ana River Basin

LOCATION.--Lat 34°12'11", long 117°26'55" referenced to North American Datum of 1927, in SW ¼ NW ¼ sec.6, T.1 N., R.5 W., San Bernardino County, CA, Hydrologic Unit 18070203, in Fontana Water Company diversion compound, near right bank of Lytle Creek, and 7.8 mi north of Fontana.

SURFACE-WATER RECORDS

PERIOD OF RECORD.--December 1971 to February 1972, May 1972, October 1972 to current year. Records prior to water year 2005 available in the files of the U.S. Geological Survey.

GAGE.--Two water-stage recorders with sharp-crested weir controls. Elevation of gage is 2,240 ft above NGVD of 1929, from topographic map.

REMARKS.--Records good. Flow at this station represents water diverted from Lytle Creek, for irrigation and domestic use, 0.1 mi downstream from station 11062000 (Lytle Creek near Fontana). Diverted flows are gaged at two adjacent weirs (stations 11062399 and 11062400). Records reported here represent the combined flow for these stations. See schematic diagram of Santa Ana River Basin available from the California Water Science Center.

EXTREMES FOR PERIOD OF RECORD.--Maximum daily discharge, 48 ft³/s, Feb. 11, 2010; no flow at times in some years.

11062402 Lytle Creek Surface Diversion near Fontana, CA—Continued

DISCHARGE, CUBIC FEET PER SECOND
WATER YEAR OCTOBER 2009 TO SEPTEMBER 2010
DAILY MEAN VALUES

Day	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
1	0.00	0.00	0.00	0.00	0.00	23	17	12	4.2	0.05	0.00	0.00
2	0.00	0.00	0.00	0.00	5.7	40	15	11	4.1	0.05	0.00	0.00
3	0.00	0.00	0.00	0.00	12	25	14	10	3.6	0.05	0.00	0.00
4	0.00	0.00	0.00	0.00	12	25	13	10	3.0	0.02	0.00	0.00
5	0.00	0.00	0.00	0.00	14	30	25	10	2.6	0.00	0.00	0.00
6	0.00	0.00	0.00	0.00	10	30	18	10	2.4	0.00	0.00	0.00
7	0.00	0.00	0.00	0.00	0.00	29	15	10	2.3	0.00	1.8	0.00
8	0.00	0.00	0.00	0.00	0.00	27	14	10	2.3	0.00	4.5	0.00
9	0.00	0.00	0.00	0.00	0.00	28	14	11	2.3	0.00	4.5	0.00
10	0.00	0.00	0.00	0.00	26	26	13	11	2.8	0.00	4.5	0.00
11	0.00	0.00	0.00	0.00	48	24	14	10	2.6	0.00	4.3	0.00
12	0.00	0.00	0.00	0.00	39	23	5.5	9.5	2.7	0.00	4.1	0.00
13	0.00	0.00	0.00	0.00	30	23	5.5	8.8	2.3	0.00	2.6	0.00
14	0.00	0.00	0.00	0.00	28	22	15	8.3	1.8	0.00	0.00	0.00
15	0.00	0.00	6.4	0.00	27	21	14	7.6	1.7	0.00	0.00	0.00
16	0.00	0.00	9.4	0.00	27	20	13	7.1	1.6	0.00	0.00	0.00
17	0.00	0.00	4.6	0.00	26	20	12	8.0	1.6	0.00	0.00	0.00
18	0.00	0.00	3.2	3.1	26	20	12	8.6	1.4	0.00	0.00	0.00
19	0.00	0.00	2.0	0.00	26	20	12	7.1	1.2	0.00	0.00	0.00
20	0.00	0.00	0.98	0.00	26	21	14	7.0	1.2	0.00	0.00	0.00
21	0.00	0.00	0.00	0.70	25	20	21	6.4	1.0	0.00	0.00	0.00
22	0.00	0.00	0.00	0.00	25	20	21	6.5	0.99	0.00	0.00	0.00
23	0.00	0.00	0.00	0.00	23	19	17	7.9	0.75	0.00	0.00	0.23
24	0.00	0.00	0.00	0.00	23	19	14	6.9	0.57	0.00	0.00	0.20
25	0.00	0.00	0.00	0.00	22	18	13	6.2	0.50	0.00	0.00	0.50
26	0.00	0.00	0.00	5.9	21	17	12	5.6	0.38	0.00	0.00	0.82
27	0.00	0.00	0.00	6.9	9.0	17	13	6.0	0.27	0.00	0.00	0.89
28	0.00	0.00	0.00	0.00	0.00	17	14	5.4	0.18	0.00	0.00	1.0
29	0.00	0.00	0.00	0.00	---	16	14	4.9	0.15	0.00	0.00	1.3
30	0.00	0.00	0.00	0.00	---	16	13	4.4	0.09	0.00	0.00	1.6
31	0.00	---	0.00	0.00	---	17	---	4.4	---	0.00	0.00	---
Total	0.00	0.00	26.58	16.60	530.70	693	427.0	251.6	52.58	0.17	26.30	6.54
Mean	0.00	0.00	0.86	0.54	19.0	22.4	14.2	8.12	1.75	0.01	0.85	0.22
Max	0.00	0.00	9.4	6.9	48	40	25	12	4.2	0.05	4.5	1.6
Min	0.00	0.00	0.00	0.00	0.00	16	5.5	4.4	0.09	0.00	0.00	0.00
Ac-ft	0.00	0.00	53	33	1,050	1,370	847	499	104	0.3	52	13

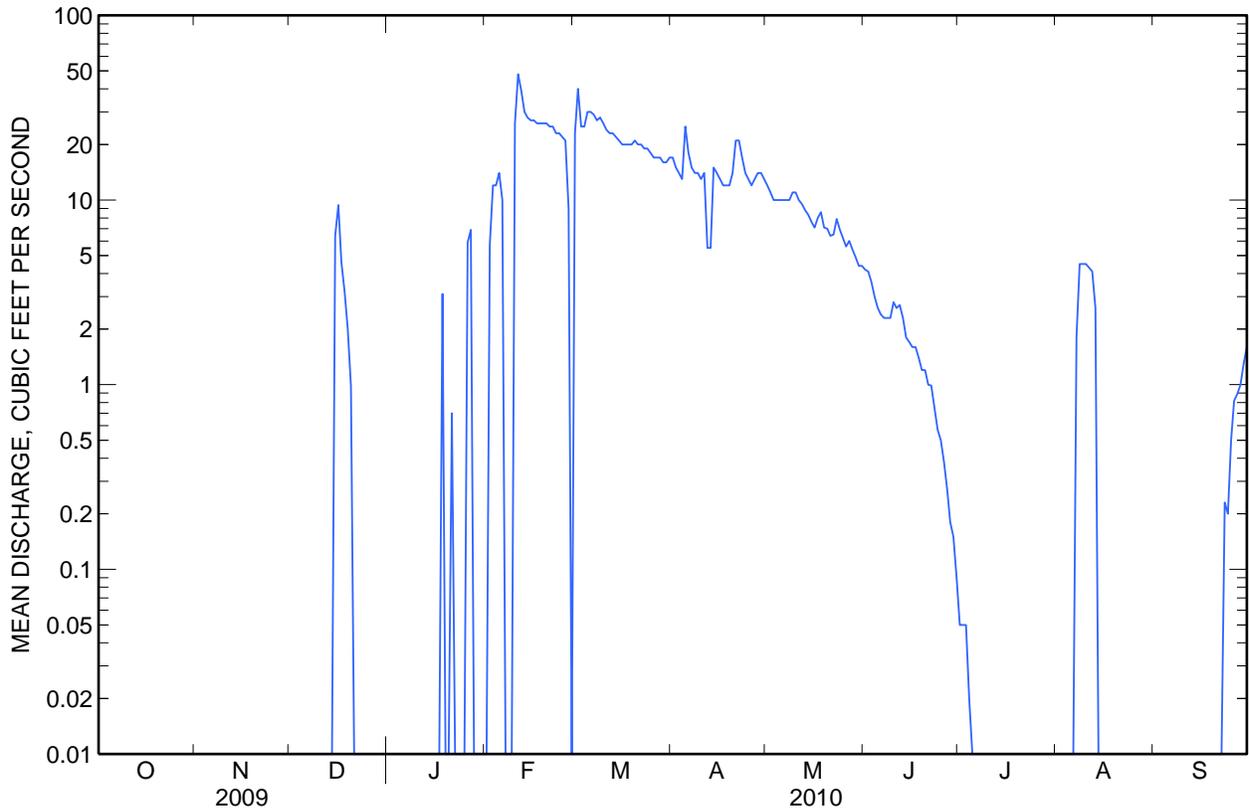
STATISTICS OF MONTHLY MEAN DATA FOR WATER YEARS 1972 - 2010, BY WATER YEAR (WY)

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Mean	4.49	3.44	3.12	3.20	4.56	6.29	6.67	6.10	4.48	4.82	5.55	5.51
Max	30.4	26.5	28.2	19.6	25.8	30.3	35.0	40.3	37.6	35.3	35.2	36.4
(WY)	(1999)	(2006)	(2006)	(1997)	(1997)	(1998)	(1998)	(1995)	(1995)	(1995)	(1993)	(1998)
Min	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
(WY)	(1976)	(1976)	(1974)	(1975)	(1975)	(1977)	(1976)	(1976)	(1976)	(1975)	(1975)	(1975)

11062402 Lytle Creek Surface Diversion near Fontana, CA—Continued

SUMMARY STATISTICS

	Calendar Year 2009		Water Year 2010		Water Years 1972 - 2010	
Annual total	331.70		2,031.07			
Annual mean	0.91		5.56		4.87	
Highest annual mean					19.8	1995
Lowest annual mean					0.00	2000
Highest daily mean	9.7	Feb 25	48	Feb 11	48	Feb 11, 2010
Lowest daily mean	0.00	Jan 1	0.00	Oct 1	0.00	Dec 1, 1971
Annual seven-day minimum	0.00	Jan 1	0.00	Oct 1	0.00	Dec 1, 1971
Annual runoff (ac-ft)	658		4,030		3,530	
10 percent exceeds	4.9		20		17	
50 percent exceeds	0.00		0.00		0.00	
90 percent exceeds	0.00		0.00		0.00	



Water-Data Report 2010

11062450 Fontana Powerplant Forebay Spillway near Fontana, CA

Santa Ana River Basin

LOCATION.--Lat 34°12'10", long 117°26'54" referenced to North American Datum of 1927, in SE ¼ NW ¼ sec.6, T.1 N., R.5 W., San Bernardino County, CA, Hydrologic Unit 18070203, on left side of Fontana Powerplant forebay, near right bank of Lytle Creek, and 7.8 mi north of Fontana.

SURFACE-WATER RECORDS

PERIOD OF RECORD.--October 1972 to current year. Records for October 1972 to September 2004 available in the files of the U.S. Geological Survey.

GAGE.--Water-stage recorder and sharp-crested weir. Elevation of gage is 2,240 ft above NGVD of 1929, from topographic map.

REMARKS.--Records good. Flow at this station represents spill from the Fontana Powerplant forebay, with such flow directed back to Lytle Creek via a constructed channel. See schematic diagram of Santa Ana River Basin available from the California Water Science Center.

EXTREMES FOR PERIOD OF RECORD.--Maximum daily discharge, 27 ft³/s, Mar. 8, 1992; no flow at times in most years.

11062450 Fontana Powerplant Forebay Spillway near Fontana, CA—Continued

DISCHARGE, CUBIC FEET PER SECOND
WATER YEAR OCTOBER 2009 TO SEPTEMBER 2010
DAILY MEAN VALUES

[e, estimated]

Day	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
1	0.00	0.00	0.00	0.00	0.00	8.3	0.28	0.00	0.00	0.00	0.00	0.00
2	0.00	0.00	0.00	0.00	0.00	11	0.00	0.00	0.00	0.01	0.00	0.00
3	0.00	0.00	0.00	0.00	0.00	3.2	0.00	0.00	0.00	0.00	0.00	0.00
4	0.00	0.00	0.00	0.00	0.00	7.7	0.00	0.00	0.00	0.00	0.00	0.00
5	0.00	0.00	0.00	0.00	0.61	11	6.0	0.00	0.00	0.00	0.00	0.00
6	0.00	0.00	0.00	0.00	1.7	10	0.02	0.00	0.00	0.00	0.00	0.00
7	0.00	0.00	0.00	0.00	0.00	8.9	0.00	0.00	0.00	0.00	0.00	0.00
8	0.00	0.00	0.00	0.00	0.00	6.9	0.00	0.00	0.00	0.00	0.00	0.00
9	0.00	0.00	0.00	0.00	0.00	7.6	0.00	0.00	0.00	0.00	0.00	0.00
10	0.00	0.00	0.00	0.00	11	5.4	0.00	0.00	0.00	0.00	0.00	0.00
11	0.00	0.00	0.00	0.00	19	3.7	0.00	0.00	0.00	0.00	0.00	0.00
12	0.00	0.00	0.05	0.00	9.4	2.4	4.1	0.00	0.00	0.00	0.00	0.00
13	0.00	0.00	0.00	0.00	0.95	1.6	0.00	0.00	0.00	0.00	0.00	0.00
14	0.00	0.00	0.00	0.00	3.2	1.3	0.00	0.00	0.00	0.00	0.00	0.00
15	0.00	0.00	0.00	0.00	11	1.1	0.00	0.00	0.00	0.00	0.00	0.00
16	0.00	0.00	0.08	0.00	10	1.2	0.00	0.00	0.00	0.00	0.00	0.00
17	0.00	0.00	0.00	0.00	9.4	0.88	0.00	0.00	0.00	0.00	0.00	0.00
18	0.00	0.00	0.00	9.8	8.8	0.81	0.00	0.00	0.00	0.00	0.00	0.00
19	0.00	0.00	0.00	5.2	8.8	0.67	0.00	0.00	0.00	0.00	0.00	0.00
20	0.00	0.00	0.00	2.9	8.8	0.71	0.00	0.00	0.00	0.00	0.00	0.00
21	0.00	0.00	0.00	0.00	8.1	0.39	0.47	0.00	0.00	0.00	0.00	0.00
22	0.00	0.00	0.00	0.00	7.5	0.22	0.64	0.00	0.00	0.00	0.00	0.00
23	0.00	0.00	0.00	0.00	6.5	0.05	0.00	0.13	0.00	0.00	0.00	0.00
24	0.00	0.01	0.00	0.00	5.7	0.00	0.00	0.00	0.00	0.00	0.00	0.00
25	0.00	0.00	0.00	0.00	4.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00
26	0.00	0.00	0.00	0.31	2.2	0.00	0.00	0.00	0.00	0.00	0.00	0.00
27	0.00	0.00	0.00	2.3	5.4	0.00	0.00	0.00	0.00	e0.00	0.00	0.00
28	0.00	0.00	0.00	0.00	0.00	0.00	0.43	0.00	0.00	e0.00	0.00	0.00
29	0.00	0.00	0.00	0.00	---	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30	0.00	0.00	0.00	0.00	---	0.00	0.00	0.00	0.00	0.00	0.00	0.00
31	0.00	---	0.00	0.00	---	0.47	---	0.00	---	0.00	0.00	---
Total	0.00	0.01	0.13	20.51	142.56	95.50	11.94	0.13	0.00	0.01	0.00	0.00
Mean	0.00	0.00	0.00	0.66	5.09	3.08	0.40	0.00	0.00	0.00	0.00	0.00
Max	0.00	0.01	0.08	9.8	19	11	6.0	0.13	0.00	0.01	0.00	0.00
Min	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Ac-ft	0.00	0.02	0.3	41	283	189	24	0.3	0.00	0.02	0.00	0.00

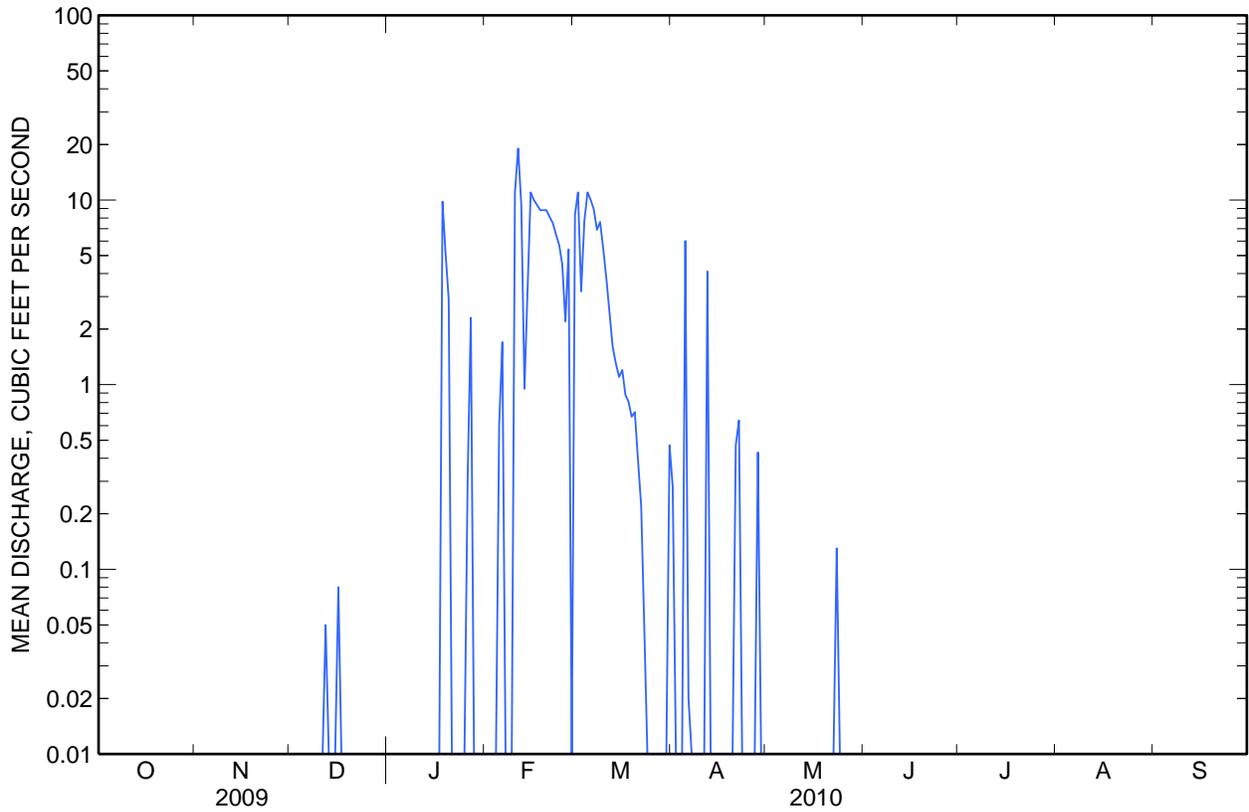
STATISTICS OF MONTHLY MEAN DATA FOR WATER YEARS 1973 - 2010, BY WATER YEAR (WY)

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Mean	0.28	0.12	0.15	0.32	0.93	1.27	0.94	1.41	1.15	1.12	0.83	0.58
Max	3.45	1.42	1.30	2.81	5.09	9.01	8.45	13.9	15.8	9.90	6.45	9.87
(WY)	(1999)	(2005)	(1997)	(1997)	(2010)	(1998)	(1992)	(1995)	(1980)	(1993)	(1993)	(1998)
Min	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
(WY)	(1973)	(1975)	(1974)	(1975)	(1974)	(1977)	(1974)	(1973)	(1974)	(1973)	(1973)	(1974)

11062450 Fontana Powerplant Forebay Spillway near Fontana, CA—Continued

SUMMARY STATISTICS

	Calendar Year 2009		Water Year 2010		Water Years 1973 - 2010	
Annual total	1.05		270.79			
Annual mean	0.00		0.74		0.76	
Highest annual mean					3.71	1995
Lowest annual mean					0.00	2007
Highest daily mean	0.68	Feb 19	19	Feb 11	27	Mar 8, 1992
Lowest daily mean	0.00	Jan 1	0.00	Oct 1	0.00	Oct 1, 1972
Annual seven-day minimum	0.00	Jan 1	0.00	Oct 1	0.00	Oct 1, 1972
Annual runoff (ac-ft)	2.1		537		549	
10 percent exceeds	0.00		1.6		2.0	
50 percent exceeds	0.00		0.00		0.00	
90 percent exceeds	0.00		0.00		0.00	



ATTACHMENT 15-2
(for Chapter 15 of DRA's Report)

Excerpts from San Gabriel's
Phase 2 Reply Brief (pp.25-26) and
Evidentiary Hearings Transcript (Tr. 831-841) in
proceeding A.08-07-009

recommendation that 33.9% of that capacity be considered not “used and useful.” DRA Opening Brief, at 18-22.

This analysis is completely wrong. Annual volumes, whether of stream flow or flow through a pipeline or water processed through a treatment plant, provide no definitive basis for determining the frequency with which that treatment plant will have sufficient water available to operate at a particular level of production. DRA witness Shah’s data about the number of days of Lytle Creek stream flow with excess turbidity, fundamentally flawed though the data are, nonetheless show the effects of having the upgraded Sandhill Plant available to process those turbid stream flows. See, San Gabriel Opening Brief, at 42-44. The ability to process turbid stream flows will substantially increase the Sandhill Plant’s capacity to bring that water into the water distribution system.

- (ii) The City’s and FUSD’s reliance on historical flow through the Edison penstock sheds little light on the resources available.

FUSD makes a more extreme claim than the City about the availability of high stream flows in Lytle Creek, picking out a period of nine years (1994 to 2002) when, according to United States Geological Survey (“USGS”) measurements at the Edison penstock, there were only seven days when flow through the penstock exceeded 30 mgd. FUSD Opening Brief, at 11. The City, too, relies on these data for its calculations about the percentage of the time that particular flow levels have been available. Of course, the same set of measurements shows, although both FUSD and the City ignore it, that in the years immediately before and after FUSD’s 9-year period, far greater numbers of days (e.g., 122 days in 1993 alone) saw penstock flows exceeding 30 mgd.

More importantly, the City and FUSD refuse to admit that their last minute ploy of introducing USGS gauge readings and the City witness’s interpretation of them into the record through friendly questioning by FUSD counsel proved nothing at all about the volume of Lytle Creek stream flow during the years studied. This is because they failed to include in their 11th hour showing any readings from the USGS gauge in Lytle Creek downstream from the point at

which Edison's penstock system diverts stream flow through its generating stations to the Afterbay and they ignored the fact that Edison routinely dumps water back into the Creek in Lytle Creek Canyon before it can enter the penstock system. As Mr. LoGuidice testified in rebuttal to the City/FUSD last day's showing, very substantial volumes of Lytle Creek stream flow were not accounted for by the USGS gauge readings showing only the flow in the penstock. The evidence is clear that ample Lytle Creek flows are available on many days in an average year and that Edison has a legal obligation to divert a substantially increased volume of that water for San Gabriel's use. Tr. 832:8-837:24 (LoGuidice/SGV); Tr. 631:2-19 (Whitehead/SGV); *Ssee a/so*, San Gabriel Opening Brief, at 53-54.

In short, the limited volumes of water historically flowing through Edison's penstock shed little light on the volume of stream flow that can be delivered to the Afterbay for delivery on to Sandhill. As demonstrated by the USGS data in Exhibit SG-33 (LoGuidice), the water is there in ample supply on many days of most years. The challenge now is to insist that Edison capture and deliver San Gabriel's full requirements up to 38 mgd even though past circumstances required Edison to deliver only a fraction of that volume. Tr. 631:2-19 (Whitehead/SGV). The City's assertion that "almost never will there be sufficient flows through the penstock system" (City Opening Brief, at 22) is contradicted by these facts and is without foundation.

- (iii) All the Opposing Parties appear to misunderstand the role of State water in San Gabriel's resource plan.

The City discounts the use of State Project water as "unrealistic," because its supply is limited, it is expensive, and it is not the subject of any binding agreement with any SWP supplier. City Opening Brief, at 18, 23. DRA and FUSD make similar contentions. DRA Opening Brief, at 18; FUSD Opening Brief, at 14.

The Opposing Parties fail to recognize a number of very important facts, including: (1) the difference in price between State water supplied through San Bernardino Valley Municipal Water District ("MUNI") and through Inland Empire Utility Agency, a sub-agency of

1 ALJ O'DONNELL: Nothing else for this witness?
2 MR. MAC VEY: No, your Honor.
3 ALJ O'DONNELL: Very well, the witness is excused.
4 THE WITNESS: Thank you.
5 ALJ O'DONNELL: Off the record.
6 (Off the record)
7 (Recess taken).
8 ALJ O'DONNELL: On the record.
9 FRANK A. LO GUIDICE, recalled as a
10 witness by San Gabriel Valley Water
11 Company, having been sworn, testified as
12 follows:
13 ALJ O'DONNELL: Please be seated.
14 State your name, spell your last name, and
15 give your business address.
16 THE WITNESS: My name is Frank A. LoGuidice,
17 spelled L-o G-u-i-d-i-c-e. My place of business is
18 11142 Garvey Avenue, El Monte, California.
19 ALJ O'DONNELL: Mr. Mattes.
20 MR. MATTES: Your Honor, we have circulated
21 a document that we'd like to have marked as the next
22 exhibit in order. It consists of four stapled documents
23 attached by a paper clip.
24 ALJ O'DONNELL: And what will you describe first
25 page as?
26 MR. MATTES: And the document is a series of pages
27 printed out from the website of the United States
28 Geological Service. And the first page is entitled USGS
11062000 Lytle, appears to be Creek Near Fontana

1 California.

2 ALJ O'DONNELL: Very well. It will be marked for
3 identification as Exhibit SG-33.

4 (Exhibit No. SG-33 was marked for
5 identification.)

6 DIRECT EXAMINATION

7 BY MR. MATTES:

8 Q Mr. LoGuidice, do you have before you Exhibit
9 SG-33?

10 A Yes, I do.

11 Q And is SG-33 a collection of four documents,
12 each of which was printed out from the United States
13 Geological Service website?

14 A Yes.

15 Q And I see down at the bottom of the first
16 stapled section the references to the months January
17 2008 through December 2008, is that correct?

18 A Yes.

19 Q So these are records of something by day of
20 the month, 1 through 31 for each of those 12 months in
21 2008, is that correct?

22 A That's correct.

23 Q And likewise, the other three stapled
24 documents are for 2005 through 2007?

25 A That's correct.

26 Q What is it that's shown on these tables?

27 A These tables list water flow as measured by
28 the USGS at a gauging station located just north of

1 a bridge that crosses Lytle Canyon.

2 If I may --

3 Q Can you show us where that bridge is located
4 on the schematic that Mr. Thornton or I put on the board
5 earlier?

6 A Yes, I can.

7 [Approaching white board]

8 Q And be as descriptive as you in the way you
9 describe it.

10 A This is the dam area, fish mill or dam area
11 where Edison first diverts water to their upper
12 powerhouse here. The flow is ultimately brought into
13 Fontana Union's intake facility right here (indicating).

14 In addition to that water that's diverted,
15 the actual streamflow that continues to flow along here
16 crosses a bridge in this area here (indicating) and
17 U.S. --

18 Q That's below the dam but above the upper
19 powerhouse?

20 A I believe it's slightly above the upper
21 powerhouse.

22 And this is USGS station 11062000. And that's
23 the flow data listed on Exhibit SG-33.

24 Q And how does water get into that point?

25 A Well, it's in the stream channel right here as
26 it crosses under or by this gauging station. And then
27 slightly below that, there's what's called a soft plug
28 or an earthen dam that Union constructs here, and that

1 diverts additional streamflow from this location into
2 the intake facility here (indicating) to the extent that
3 this can be taken in to the rest of the intake facility.

4 But there's oftentimes substantial amounts of
5 water that go around this soft plug and continue in
6 the channel. That water is not measured in the USGS
7 computations that were just discussed earlier by
8 Mr. Thornton. His sheets only measure the water that
9 comes into the tailrace here, the water that is bypassed
10 back to the channel before it goes into the penstock,
11 and I believe this outlet here from the afterbay.

12 Having said that, the water that is diverted
13 from the channel into the intakes and the balance that
14 bypasses that is additional quantities of water that are
15 not listed in the other three exhibits.

16 Q That are not listed in --

17 A The previous three USGS -- I believe they were
18 11062800, USGS No. 11062820, and 11062700.

19 Q And those were Fontana Union School
20 District -- that is FUSD Exhibit 7; is that correct?

21 A I believe so.]

22 Q Now, under what circumstances will there be
23 substantial streamflow flowing through the measuring
24 station 11062000?

25 A At any time when we've had sufficient rainfall
26 or snow melt, the water flows in the channel and would
27 be measured at that location.

28 Q But a portion of that water would have been

1 taken out of the channel by Edison at its dam; is that
2 not correct?

3 A Some of that water is taken out of the channel
4 at the soft plug where we divert it to the intake
5 facility, and it would be measured at one of the
6 stations that were discussed earlier. But there's often
7 times additional water that bypasses the soft plug, and
8 that's water that is not included in the previous
9 exhibits.

10 Q Now, I'd like to refer you specifically to the
11 data for the year 2005 in Exhibit SG-33. And looking,
12 for example, at January of 2005, what does that tell you
13 about stream flow measured at the bridge in that month?

14 A It appears that only one day, two days,
15 actually, January 5th and 6th, were below 45 cubic feet
16 per second. And just as a reference point, 45 cubic
17 feet per second is 29 million gallons per day. So every
18 day in January except those two days flows were
19 substantially higher than 29 million gallons per day.

20 Q For example, on January 9 what was the stream
21 flow in million gallons per day?

22 A Well, it's 2,000 cubic feet per second.

23 Q Just roughly?

24 A I don't have them calculated. Let's see.
25 About 120 million gallons per day.

26 Q Then looking at the totals for the months of
27 2005, those show up on the second to last page of the
28 exhibit; is that right?

1 A Yes, they do.

2 Q And does the line showing minimums have any
3 significance to you?

4 A Yes. The last line shows the minimum flow on
5 any day during the months February through -- through
6 July, actually, even August, having not been below 45
7 CFS. So which means that every single day from February
8 through August the flow would have been more than 29
9 million gallons per day.

10 Q Now, if we look then at 2006, how does that
11 compare to 2005?

12 A 2006 was a dryer year than 2005. So there
13 isn't quite the quantities of water available in the
14 stream during 2006. But even at that, you can see that
15 from January through, it appears to be -- it appears to
16 be through June that the flows were not below 45 CFS per
17 day per second.

18 Q Where do you see that?

19 A Well, I'm sorry. The maximums were that, but
20 there was a range of flows between, for example, January
21 the flows ranged between a maximum of 360 CFS and a
22 minimum of 17 CFS.

23 Q And looking on a daily basis, you see a number
24 of days on which the flow was at the 45 or higher?

25 A Well, if you'd like, I can go through that.
26 In January there appears to be three days when it was 29
27 million a day or more.

28 Q Then when we go into 2007 and 2008, what's the

1 relative situation?

2 A For the most part the flows are much lower,
3 but then again in Southern California we've been in the
4 midst of a very severe drought for the last few years.
5 And we would expect those numbers to increase when we
6 have more rain.

7 Q But these numbers indicate the flow that --
8 tell me how these numbers relate to the numbers that are
9 measured at the penstock?

10 A The penstock would only include such water as
11 the penstock was capable of carrying, which is currently
12 about 28 million gallons per day. And there would be
13 flows in excess of the penstock flows. Only to the
14 extent that Edison hasn't delivered more than that. But
15 they are under contract to deliver Fontana Union's water
16 to Fontana Union, and it may require that we revisit
17 that agreement with Edison and have them increase their
18 capability.

19 Q Do the data provided in Exhibit SG-33 indicate
20 to you that Edison does indeed divert water from its
21 powerhouse system on certain days and allow it to flow
22 through Lytle Creek and not pass through the penstock?

23 A There are many days when Edison does that,
24 yes.

25 MR. MATTES: Thank you.

26 ALJ O'DONNELL: Cross?

27 MR. ALLEN: Briefly, your Honor.

28 CROSS-EXAMINATION

1 BY MR. ALLEN:

2 Q Just so I'm clear from your testimony, what is
3 now marked SG-33 is the gage readings from the bridge,
4 correct?

5 A That's correct.

6 Q And that bridge is basically out in the creek
7 as it goes below the dam, correct?

8 A That's correct.

9 Q And so whatever passes through there, there's
10 a I guess a little berm of some sort that you said you
11 can actually bypass the pumphouse and send it into the
12 penstock through that diversion facility?

13 A There's an earthen dam that's constructed to
14 divert flows, yes.

15 Q Okay. And that pretty much allows the company
16 to bypass the pumphouse when they have flows that would
17 damage their pump or whatever if they can divert it that
18 way, correct?

19 A That's correct.

20 Q Okay. But this water is not any water that
21 is -- let me ask a better question.

22 The gage down at the end of the penstock is
23 the actual reading of the water going into this
24 afterbay, correct?

25 A Into the afterbay, yes.

26 Q Okay. And so this water is the water that
27 goes on the screen that wasn't collected in one way or
28 another by Edison, correct?

1 files. I have not reviewed them recently, no.

2 Q Do you know if they exist?

3 A We do have some files on USGS flows. To the
4 extent they exist, I don't know.

5 Q And how far back do they go if they do exist?

6 A I can't answer that. I don't know.

7 Q Now, you said that you may revisit the
8 contract with Edison; is that correct?

9 A Yes.

10 Q And have you had any discussions at any time
11 since the planning phases of Sandhill and the
12 construction of Sandhill with Edison about revisiting
13 the contract and the issue that you testified to today?

14 A No, we have not.

15 Q So when say you may revisit it, was that
16 decision of maybe revisiting it made today?

17 A No. We've discussed having to talk with
18 Edison about their turning out of the water because
19 there are times when they turn it out even when
20 turbidities are such that they -- we could take the
21 water but they couldn't. And they were doing that
22 because they were short on manpower. But we have had
23 discussions with them, and we'll continue to have
24 discussions with them about that.

25 Q My understanding is, from your testimony is
26 that you have not actually gone to Edison and revisited
27 this issue; is that correct?

28 A The contract issue, no.

1 MR. MAC VEY: No further questions, your Honor.

2 ALJ O'DONNELL: I have nothing for this witness.

3 Anything else?

4 (No response)

5 ALJ O'DONNELL: Very well. The witness is
6 excused.

7 Off the record.

8 (Off the record)

9 ALJ O'DONNELL: On the record.

10 Mr. Mattes.

11 MR. MATTES: Yes, your Honor. In discussion among
12 counsel and yourself we've determined that the company
13 and the City and the school district will in some manner
14 submit a letter to you that indicates lines of the
15 transcript of today's hearing that will be stricken
16 relating to certain functions constructed as part of the
17 West Valley Water District Water Treatment Plant as
18 testified to by Mr. Thornton and that were the subject
19 of the company's motion to strike, which on that basis
20 will be withdrawn.

21 ALJ O'DONNELL: And will that, whatever that
22 resolution turns out to be, satisfy your noted
23 objections?

24 MR. MATTES: Yes.

25 ALJ O'DONNELL: During the course of today's
26 events and the previous days there's been discussion of
27 how many employees are going to be in Building A, the
28 new headquarters. I'm looking at Ms. Ramas's testimony,

ATTACHMENT 15-3
(for Chapter 15 of DRA's Report)

**DRA Site Visit Photos of Southern California Edison
Company's Lytle Creek Power House and Afterbay
Facilities in Fontana, CA on August 10, 2011**



Figure 1 – Southern California Edison’s Lytle Creek Power House and Afterbay structure in Fontana, CA

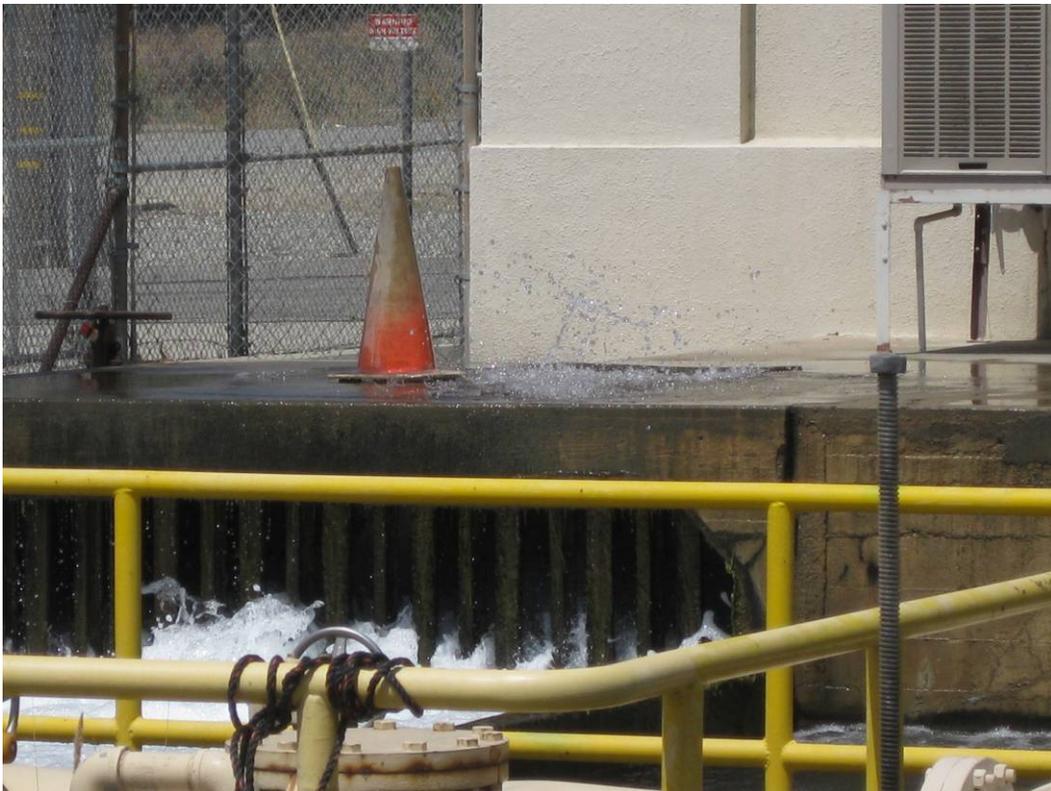
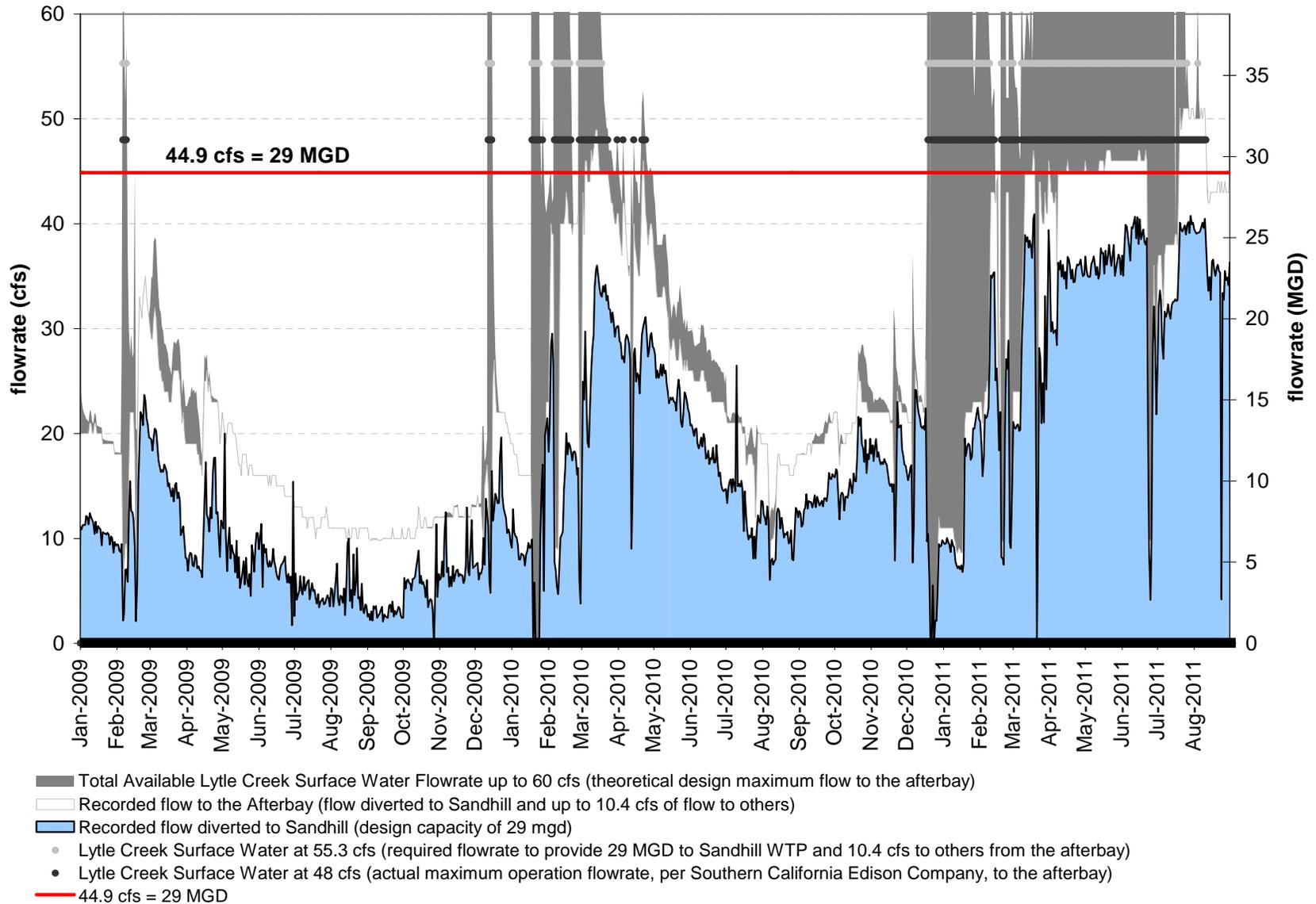


Figure 2 – Close-up of water splashing out of an access cover located between the Power House and the Afterbay

ATTACHMENT 15-4
(for Chapter 15 of DRA's Report)

**Full Page Version of Figure 15-B: Daily Recorded
Available Lytle Creek Surface Water and the Daily
Recorded Flow Diverted to the Sandhill Water
Treatment Plant**

DAILY RECORDED FLOWRATE:



ATTACHMENT 15-4

Daily Recorded Available Lytle Creek Surface Water and the Daily Recorded Flow Diverted to the Sandhill Water Treatment Plant (same as Figure 15-B)

ATTACHMENT 15-5
(for Chapter 15 of DRA's Report)

**San Gabriel's Attachment 7 to its Response to DRA's
Data Request AR4-001 – "Explanations for Reduced
Lytle Creek Flow to the Sandhill Water Treatment
Plant"**

EXPLANATIONS FOR REDUCED LYTLE CREEK FLOW TO THE SANDHILL WATER TREATMENT PLANT

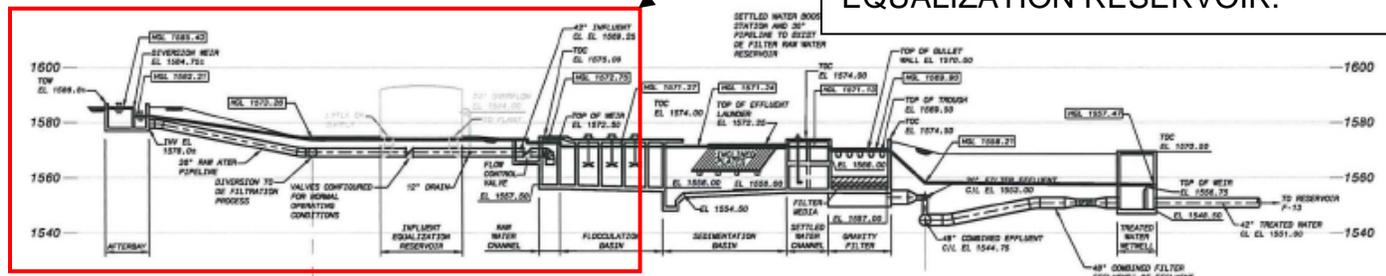
- 1/1/11 – We began 2011 with a reduced flow from Lytle Creek due to a series of heavy rain storms causing the soft plug at the F-27 pond to erode away on 12/20/10.
- 2/9/11 – There was a partial dump at the F-11 dump valve due to the D.E. plant being put into manual recirculation because of high turbidity caused by the intake surface flow being restored.
- 2/14/11 – There was a partial dump at the F-11 dump valve due to a power failure in the TESCO L2000 panel at the D.E. plant.
- 2/16/11 – SCE requested us to turn out our intake surface flow due to high turbidity levels during a storm event and there was a partial dump at the F-11 dump valve due to the Fontana system being full.
- 2/18/11 – SCE requested us to turn out our intake surface flow due to high turbidity levels during a storm event and there was a partial dump at the F-11 dump valve due to low demand and the Fontana system being full.
- 2/22/11 – There was a partial dump at the F-11 dump valve due to low demand and the Fontana system being full.
- 2/23/11 – There was a partial dump at the F-11 dump valve due to low demand and the Fontana system being full.
- 2/26/11 – SCE requested us to turn out our intake surface flow due to high turbidity levels during a storm event and a further loss of flow was caused by a small portion of the soft plug at the F-27 pond eroding away.
- 3/8/11 – After having started their second turbine at the F-11 powerhouse, SCE shut the turbine down for two days due to a mechanical issue.
- 3/17/11 – The F-11 dump valves were opened to assist with a SCE flow test through the lower powerhouse and to allow inspection and maintenance of the effluent flume of the powerhouse.
- 3/20/11 – SCE requested us to turn out our intake surface flow due to high turbidity levels during a storm event and SCE shut down the lower powerhouse to prohibit dirty water from entering the lower penstock.
- 6/23/11 – 7/19/11 – SCE shut down the lower powerhouse due to major malfunctions with both turbines. Flows from our intakes to F-11 were varied due to the nature of the repairs at the powerhouse.
- 8/11/11 – 8/31/11 – SCE shut down one of the turbines at the lower powerhouse due to bad bearings.

0016

ATTACHMENT 15-6
(for Chapter 15 of DRA's Report)

**A Comparison of the Civiltec Engineering Inc.
Hydraulic Assessment and the Black & Veatch Corp.
Design Drawings for the Hydraulic Profile of the
Sandhill Water Treatment Plant**

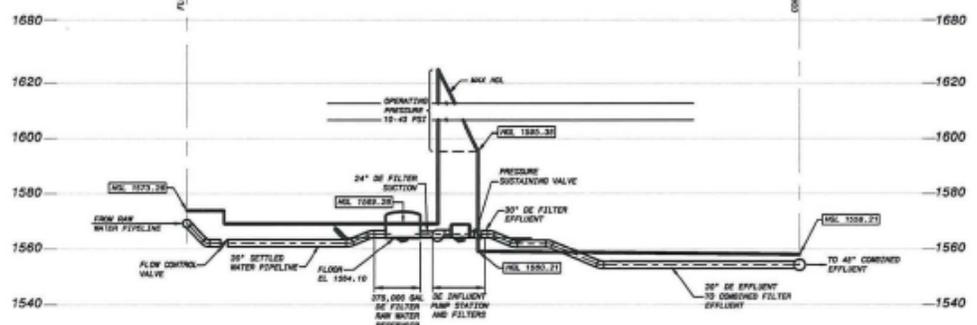
PAGE 2 SHOWS THIS DELINEATED SECTION OF THE HYDRAULIC PROFILE SPECIFIC TO THE AFTERBAY AND INFLUENT EQUALIZATION RESERVOIR.



LEGEND:
 HGL XXXX.XX @ 30.03 MGD
 EL XXXX.XX = FACILITY ELEVATION

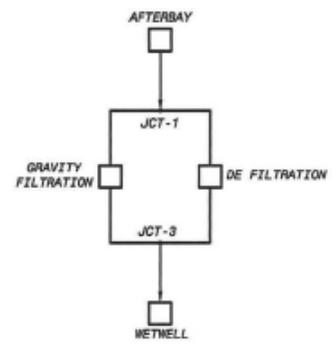
HYDRAULIC PROFILE FOR GRAVITY FILTRATION PROCESS

SCALE: VERTICAL: 1"=40'
 HORIZONTAL: NONE



HYDRAULIC PROFILE FOR DE FILTRATION PROCESS

SCALE: VERTICAL: 1"=40'
 HORIZONTAL: NONE

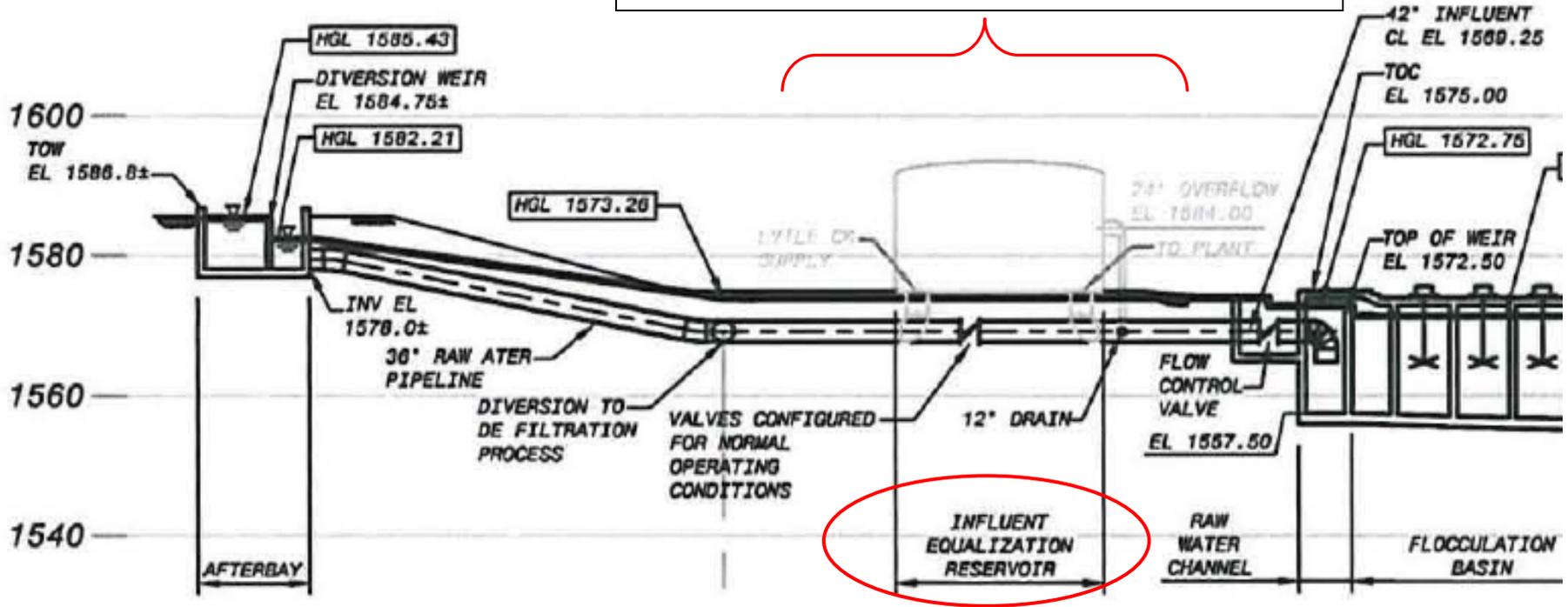


BASIC PLAN VIEW
 NTS

		General Civil, Municipal, Water and Wastewater Engineering, Planning, Construction Management and Surveying 118 West Lime Avenue Manservilla, CA 95116 Phone: (925) 357-0888 Fax: (925) 383-7957	SAN GABRIEL VALLEY WATER COMPANY SANDHILL WATER TREATMENT PLANT	FIGURE 3.02
	HYDRAULIC PROFILE FOR NORMAL OPERATING CONDITIONS			

LEGEND:
 HGL XXXX.XX @ 30.03 MGD
 EL XXXX.XX = FACILITY ELEVATION

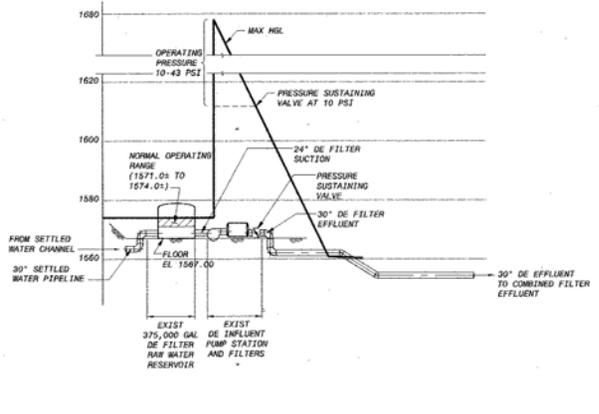
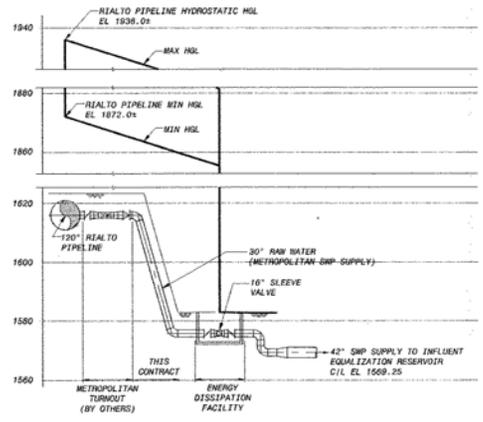
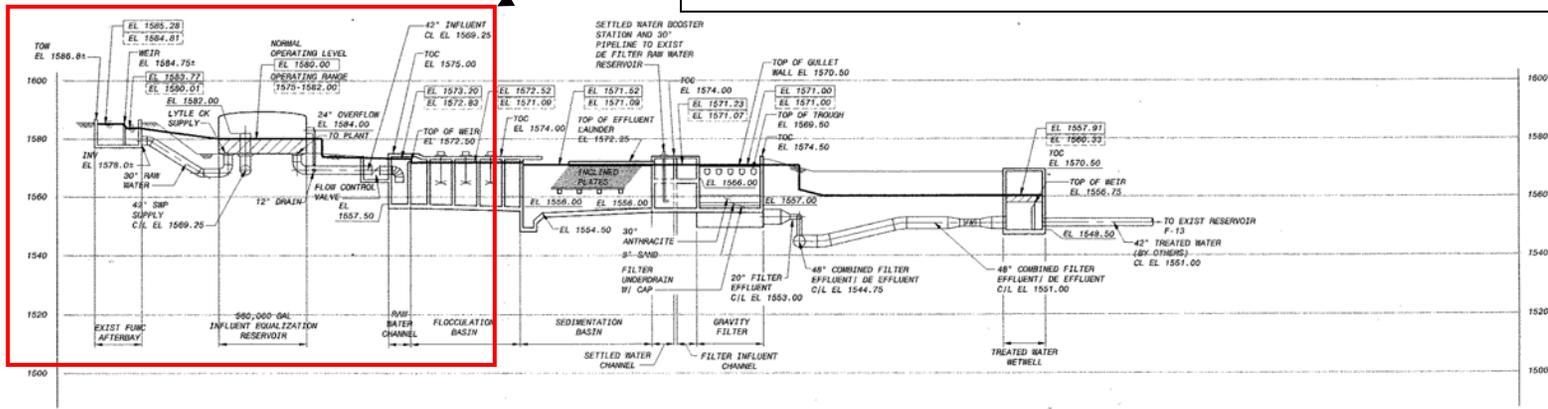
IN THIS CIVILTEC DRAWING, GREY LINES INDICATE THE INFLUENT EQUALIZATION RESERVOIR IS BYPASSED TO ACHIEVE THE 30.03 MGD FLOWRATE SHOWN IN THE LEGEND.



FROM DRAWING:

	PREPARED BY: CIVILTEC engineering inc.	General Civil, Municipal, Water and Wastewater Engineering, Planning, Construction Management and Surveying 118 West Lima Avenue Menlo Park, CA 94016 Phone: (650) 357-0588 Fax: (650) 303-7957	SAN GABRIEL VALLEY WATER COMPANY SANDHILL WATER TREATMENT PLANT	FIGURE 3.02
			HYDRAULIC PROFILE FOR NORMAL OPERATING CONDITIONS	

PAGE 4 SHOWS THIS DELINIATED SECTION OF THE HYDRAULIC PROFILE SPECIFIC TO THE AFTERBAY AND INFLUENT EQUALIZATION RESERVOIR.

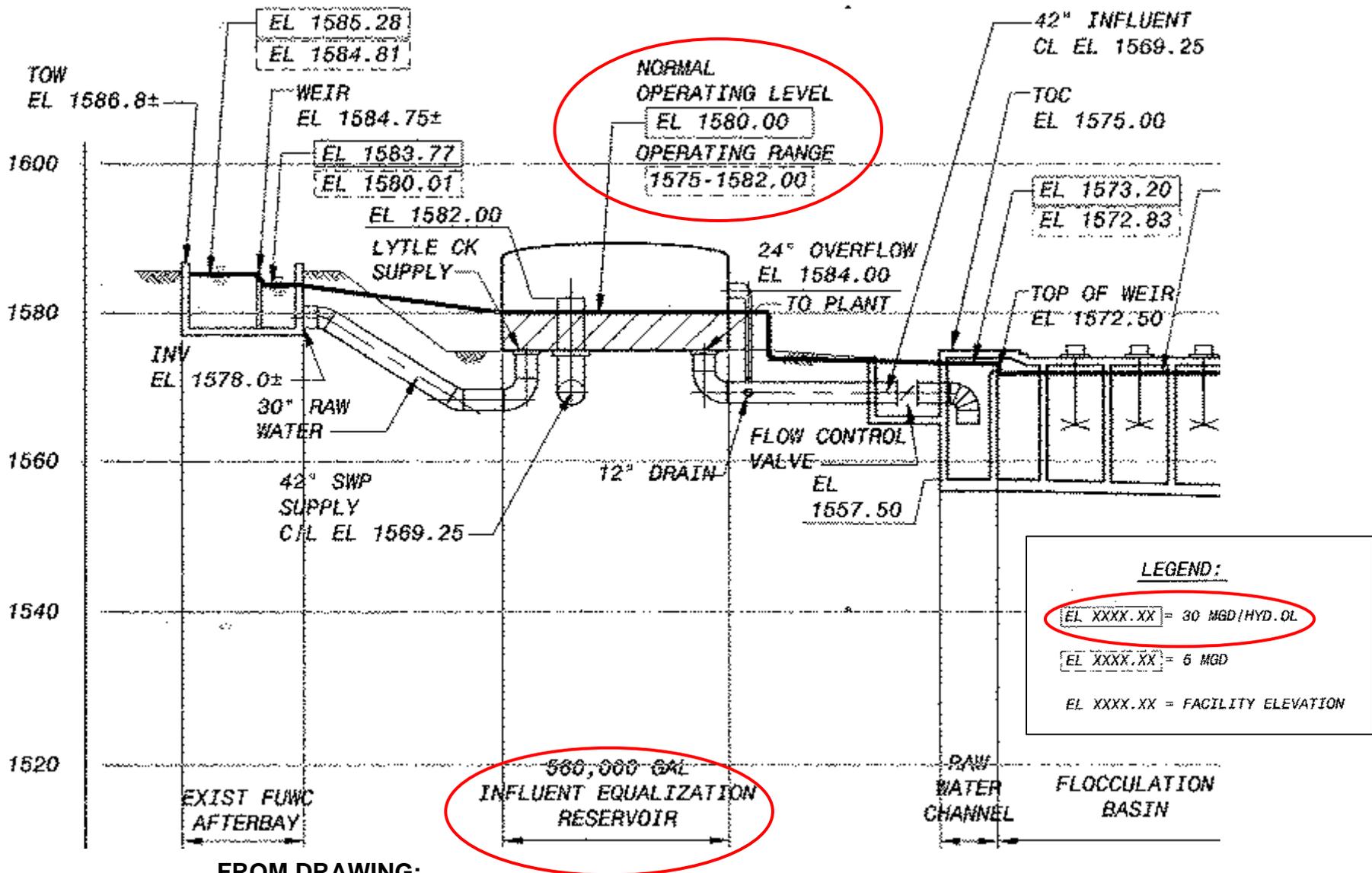


LEGEND:
 [E] XXXX.XX = 30 MGD/HYD. CL
 [E] XXXX.XX = 6 MGD
 EL XXXX.XX = FACILITY ELEVATION

DESIGNED: AGL	DATE: 08/27/04	ISSUED FOR: BID	REVISIONS AND RECORD OF DESIGN
DRAWN: JRM	PROJECT: 136811	PROJECT NO.:	136811
CHECKED: RJS	DATE: 08/27/04	PROJECT NO.:	136811
APPROVED: SWP	DATE: 08/27/04	PROJECT NO.:	136811
PROJECT NO.:	136811	PROJECT NO.:	136811
SHEET NO.:	7	SHEET NO.:	7
OF:	14	OF:	14

BLACK & VEATCH
 Black & Veatch Corporation
 New Orleans

SAV GABRIEL VALLEY WATER COMPANY
 SANDHILL WATER TREATMENT PLANT
 GENERAL
 HYDRAULIC PROFILE



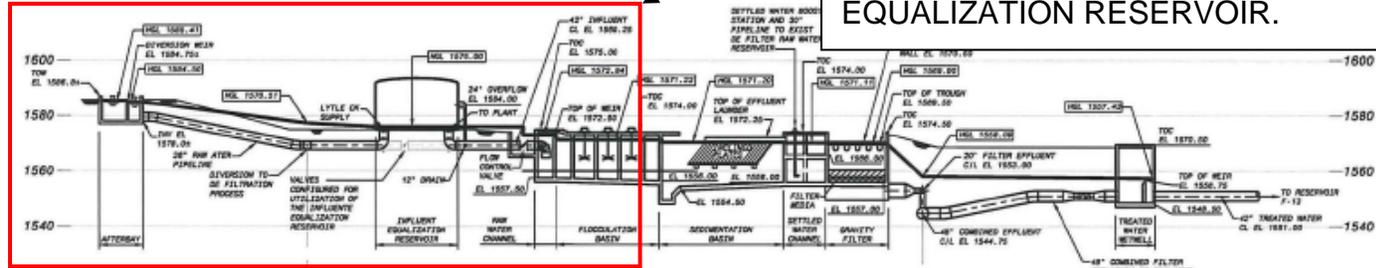
FROM DRAWING:

G-007 SHEET 174	136811 PRODUCT NO.	SAN GABRIEL VALLEY WATER COMPANY SANDHILL WATER TREATMENT PLANT	 Black & Veatch Corporation New Orleans	 8-27-04

ATTACHMENT 15-6

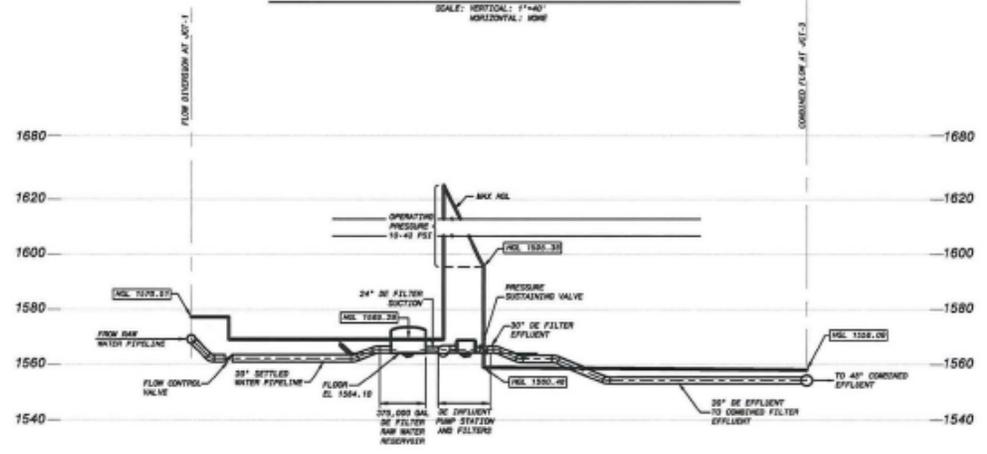
Comparison of the Civiltec Engineering Inc. hydraulic assessment and the Black & Veatch Corp. design drawings for the hydraulic profile of the Sandhill Water Treatment Plant

PAGE 6 SHOWS THIS DELINEATED SECTION OF THE HYDRAULIC PROFILE SPECIFIC TO THE AFTERBAY AND INFLUENT EQUALIZATION RESERVOIR.

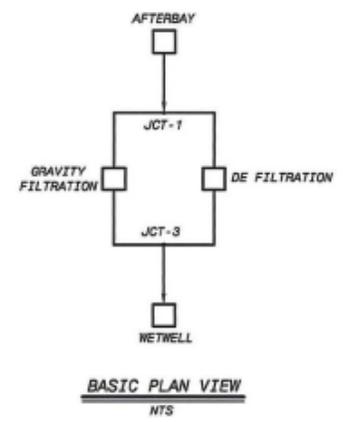


LEGEND:
 HGL XXXX.XX @ 28.26 MGD
 EL XXXX.XX = FACILITY ELEVATION

HYDRAULIC PROFILE FOR GRAVITY FILTRATION PROCESS



HYDRAULIC PROFILE FOR DE FILTRATION PROCESS



BASIC PLAN VIEW
NTS



DESIGNED BY:
CIVILTEC
 engineering inc.

General Civil, Municipal, Water and Wastewater Engineering, Planning, Construction Management and Surveying
 115 West Lime Avenue
 Maricopa, Ca. 91116
 Phone: (626) 351-0288
 Fax: (626) 353-7657

SAN GABRIEL VALLEY WATER COMPANY
SANDHILL WATER TREATMENT PLANT

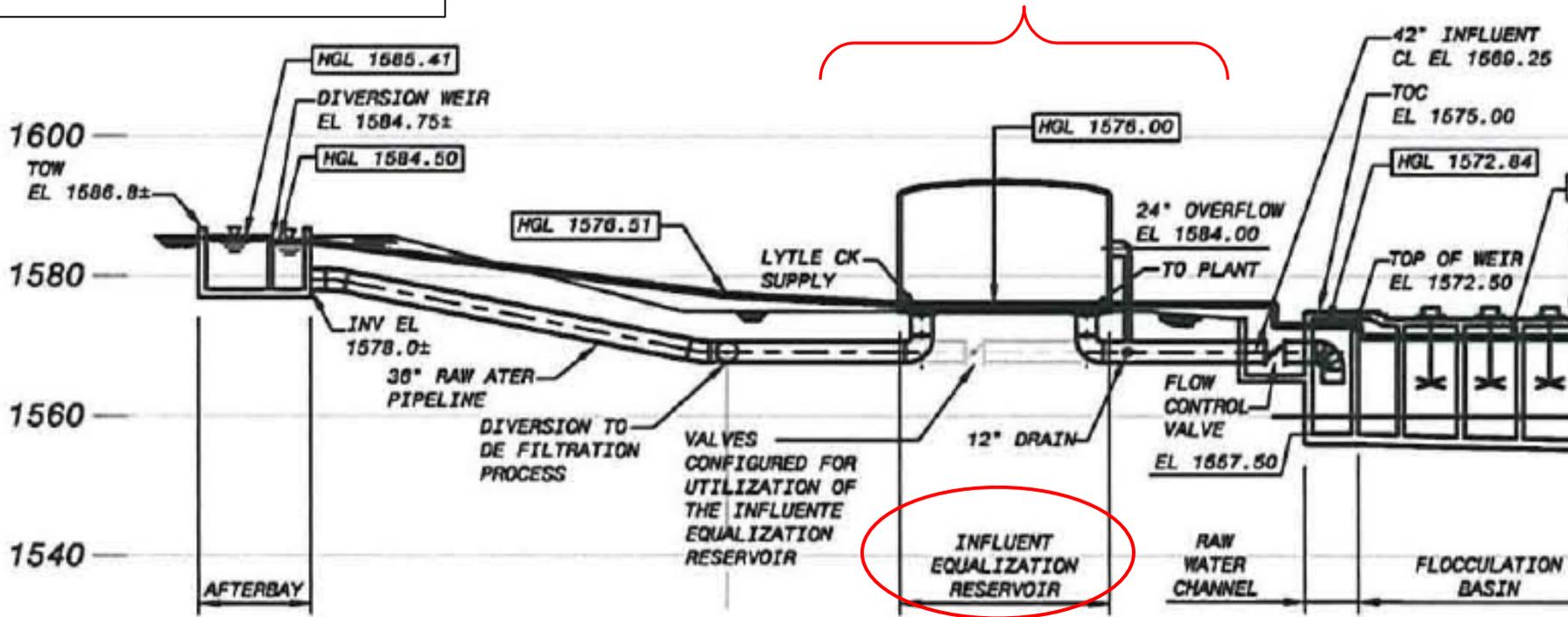
FIGURE
3.03

LEGEND:

HGL XXXX.XX @ 28.26 MGD

EL XXXX.XX = FACILITY ELEVATION

ONLY ONE FOOT OF THE INFLUENT EQUALIZATION RESERVOIR IS USED IN THIS HYDRAULIC PROFILE FOR "CONDITIONS UTILIZING INFLUENT EQUALIZATION RESERVOIR." THIS RESULTS IN A FLOWRATE OF 28.26 MGD AS SHOWN IN THE LEGEND.



NOTE: San Gabriel's response to DRA Data Request AR4-001, Question 3, states that a flow rate of 21 MGD will result if the water surface elevation in the Influent Equalization Reservoir is at 1580 feet, as shown in the Sandhill Water Treatment Plant design drawings (pages 3 and 4 of this attachment.) ***This response is not consistent with the design drawings and its legend showing a surface elevation in the Influent Equalization Reservoir at 1580 feet and a flowrate of 30 MGD.***

FROM DRAWING:

		<p>General Civil, Municipal, Water and Wastewater Engineering, Planning, Construction Management and Surveying</p> <p>118 West Lime Avenue Merced, CA 91016 Phone: (520) 357-0188 Fax: (520) 383-7957</p>	<p>SAN GABRIEL VALLEY WATER COMPANY SANDHILL WATER TREATMENT PLANT</p>	<p>FIGURE</p>
			<p>HYDRAULIC PROFILE FOR CONDITIONS UTILIZING INFLUENT EQUALIZATION RESERVOIR</p>	<p>3.03</p>

ATTACHMENT 15-6

Comparison of the Civiltec Engineering Inc. hydraulic assessment and the Black & Veatch Corp. design drawings for the hydraulic profile of the Sandhill Water Treatment Plant