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The Weekly Wrap



January 11-18, 2013

No. 2013-2

TO: CWA Member Companies
FROM: Jack Hawks, Executive Director
SUBJECT: Highlights for the Weeks Ending January 11-18, 2013

CWA Celebrates Sharun Carlson's Retirement With a Big 'Splash'—More than 125 of Sharun Carlson's closest friends and associates, plus many members of her immediate and extended family, joined together the evening of Jan. 11th at the Aquarium of the Pacific in Long Beach to celebrate her retirement after nearly 34 years of service to the California Water Association. Included in the audience were many current and former water company associates, plus many of Sharun's friends from her volunteer organizations – the Cerritos Rotary Club, the Sons of Norway and the New Life Community Church.

California Water Service Co.'s Shannon Dean did a wonderful job organizing the party, while Nossaman Senior Policy Advisor Meg Catzen-Brown, in her usual inimitable style, exceeded the program with just the right blend of charm, humor and gratitude. Among the program highlights were a special dive demonstration by the Aquarium, at which attendees were able to question the divers while they were under water.

The audience was especially taken with a special video produced by Luke Gianni of California American Water consisting of several dozen of testimonials to Sharun from her colleagues at the water companies, the California PUC, Nossaman and CWA. To top it off, there was an ongoing slide presentation of Sharun from childhood to the present, along with many photos of her family, her late husband Paul, and industry friends at CWA events over the years.

The speakers included tributes from three of Sharun's friends from the civic groups, two of her children – Debbie Newton and Scott Zastrow, as well as CWA Immediate Past President, John Tootle of Cal Water, and current CWA President R.W. Nicholson of San Gabriel Valley Water. Bob presented Sharun with her retirement gift, a very nice three-piece luggage set.

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Sharun closed the proceedings with some nice remembrances of her time with CWA, the three main areas vital to her life (family, charity and CWA) and her plans for the future, which include a trip to South America this spring. One of her Rotary friends joked about how nice it was that Sharun was retiring so she could have more time with the Rotary and her church.

Meg and I presented Sharun with a special resolution from California State Senator Jean Fuller, which recounted all of Sharun's contributions to CWA and her community. The resolution, plus Sharun's gracious remarks, was a fitting close to a terrific send-off for a wonderful lady who has embodied all that is good about CWA for the past 34 years. Congratulations to Sharun on a well-deserved tribute.

CWA's Comment Letter on Res L-436 Contributes to PUC Capitulation—

Agreeing with Pacific Gas and Electric Co. that the California PUC's expanded Draft Resolution L-436 was "legally flawed and overbroad" and a "poor use of limited Commission and party resources," CWA Regulatory Attorney Marty Mattes filed a comment letter Jan. 11th on behalf of the Association that did a masterful job of detailing the many flaws in the draft resolution. In fact, Marty received an e-mail from California PUC General Counsel Frank Lindh on Jan. 18th thanking him for his "persuasive and thoughtful comments on behalf of the water utilities in this matter. I expect you and the [California] Water Association members will be pleased with this procedural time-out."

Attached to Frank's e-mail was a letter to all parties involved with Resolution L-436 that announced the Commission's intent to:

1. Substantially narrow the scope of the resolution to address the release of Commission-prepared reports and correspondence related to PUC safety and reliability audits, inspections and infrastructure incident investigations, and other safety-related issues.
2. Use the proposed workshops to explore the nature and treatment of safety-related records that utilities and other regulated entities provide to the Commission; and

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3. Defer to a separate Commission rulemaking the remainder of the issues addressed in the current draft.

CWA's comment letter made the following compelling points, which we will keep warm for the forthcoming rulemaking:

- In common with PG&E, CWA urged the Commission's Legal Division not to pursue efforts to create "matrices identifying classes of records as public or confidential" and "an online database to include requests received by the CPUC to treat documents as confidential and the CPUC's responses to such requests." Marty stated that "such efforts are unnecessary and unduly burdensome, and that existing practices are working satisfactorily."
- The expanded resolution suffers from a fundamental failure to differentiate between documents created by the CPUC and documents provided to the Commission by public utilities and is incorrect in contending that a distinction between records an agency generates and records it obtains from others would be contrary to the open government emphasis of the California Constitution and the California Public Records Act. In fact, Marty noted, California's statutory law is more complex because even though it establishes broad rights of access, it also subjects that access to numerous exceptions in the CPRA. Further, he said, statutory law provides a procedural presumption of confidentiality for information submitted by public utilities to the CPUC in Public Utilities Code Section (§) 583.
- The authors of the expanded resolution continue to refuse to acknowledge the significance and importance of §583 – both as guarantor of procedural protections for utilities' interest in the confidentiality of some portions of the voluminous amounts of information they routinely submit to the Commission, and as facilitator of the utilities' openness and willingness to provide such information that is essential to the efficient functioning of the Commission's regulatory oversight.

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- The California Legislature itself has accorded greater significance to §583 than does the expanded resolution ... the Legislature has recognized that the presumption of disclosure provided for by the CPRA does not extend to documents provided by utilities and their affiliates to the CPUC because of the presumption of confidentiality implicit in §583 ... Instead, the Legislature directed the Commission to initiate a proceeding “to ensure that the commission’s practices under these laws provide for meaningful public participation and open decision-making” ... which the CPUC did.
- The expanded resolution’s declared intention to presume that all information provided to the Commission is publicly available, absent an approved request for confidential status would turn the procedural protection traditionally guaranteed by §583 and secured by General Order (G.O.) 66-C on its head – ensuring that utilities in future would have to think twice before making proprietary information readily available to CPUC staff.
- The authors of the expanded resolution have consistently failed to recognize public utilities’ legitimate proprietary interest in the confidentiality of certain information they provide to the Commission ... This dismissal of utilities’ due process concerns for the protection of their arguably proprietary or otherwise confidential information is “truly disturbing and unwarranted.”
- Section 583 is of equal statutory weight to CPRA. The Commission has authority to establish reasonable procedures for implementing §583, as it has done through G.O. 66-C and its predecessors. Those procedures may – and should – provide adequate notice and opportunity to object and appeal for public utilities whose proprietary interests are placed at risk by their submission of information to the Commission.

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- The expanded resolution’s “New Option for Consideration,” which would rely on new resource libraries, databases, and records tracking systems to create “an integrated and accessible system for processing requests for confidential treatment” is a recipe for regulatory overkill, bureaucratic torpor, higher utility rates, and a waste of public funds.

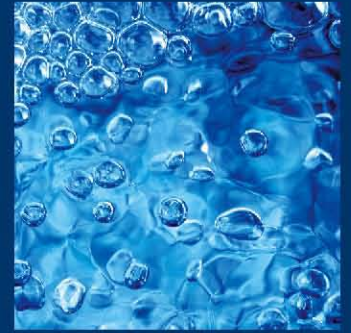
Needless to say, this last point was the coup de grâce in a well-constructed letter. Congratulations to Marty and the CWA Regulatory Committee for submitting such a persuasive set of comments.

Legislators Waste No Time On Water Bond As 2013 Opens—CWA Legislative Advocates and Nossaman Senior Policy Advisors Meg Catzen-Brown and Jennifer Capitolo issued their monthly legislative report to CWA’s Board of Directors on Jan. 11th, stating that the California state legislature is back in session and that Assembly Speaker John Perez (D–Los Angeles) and Senate President Pro Tempore Darrell Steinberg (D–Sacramento) were re-elected to lead their respective houses. Further, Assemblymember Connie Conway (R–Visalia) and Senator Bob Huff (R–Diamond Bar) will serve as Minority Leaders.

Meg and Jennifer noted that the major issues for 2013 will include school funding, gun control, environmental regulations and the implementation of the federal Affordable Care Act. Legislators have until Jan. 25th to submit their bill proposals to the Legislative Counsel’s Office for drafting. The bill introduction deadline is Feb. 22nd.

Gov. Brown released his \$139 billion budget proposal Jan. 10th, and if the legislature approves his proposal, the state will have an \$851 million budget surplus by the end of the 2013-14 fiscal year. The shift is attributed to the new taxes approved by voters in Proposition 30, which will provide \$6 billion a year from temporary tax increases, as well as budget cuts. According to the Governor’s financial advisors, the cuts were triple the amount of the tax increases.

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Meg and Jennifer reported that a number of bills have been introduced to rework the Safe, Clean and Reliable Drinking Water Supply Act of 2014, the water bond measure passed by the legislature in 2009, which has yet to be placed before the voters. **SB 36 (Rubio)** and **SB 40 (Pavley)** reduce the dollar amount of the water bond and potentially refocus the priorities, while **SB 42 (Wolk)** would replace the existing bond with a new proposal. In a news release, Senator Wolk said her proposed bond would represent “a fresh start on funding the state’s water infrastructure, not a rehash of the \$11 billion bond currently on the 2014 ballot.” She further said the current bond is too expensive and too outdated to win voter support. CWA will work with ACWA and other water supply stakeholders as the conversation about the bond unfolds.

CWA will be supporting **SB 14 (Gaines)**, which would allow recreational activities at Bear Lake Reservoir, the source of water for CWA member Lake Alpine Water Company. This is a re-introduction of last year’s SB 1063, which was vetoed due to some drafting issues. Nossaman does not foresee any issues with this bill moving forward in 2013.

Two bills regarding disclosure and hydraulic fracturing (“fracking”), **SB 4 (Pavley)** and **AB 7 (Wieckowski)**, have been introduced. Also, **AB 6 (Gorell)**, which would grant income tax credits for certain emergency standby generators, has been introduced.

Assemblymembers Alejo (D-Salinas) and Perea (D-Fresno) continue to work on issues related to the Governor’s Drinking Water Stakeholder’s group and have introduced **AB 1 and AB 21 (Alejo)**, and **AB 30 (Perea)**. AB 1 is a bill from last year that appropriates \$2 million to the State Water Resources Control Board for integrated watershed management planning in the Salinas Valley. AB 21 creates an annual fee on Safe Drinking Water Small Community grantees, which is re-deposited in the grant fund for specific water projects in severely disadvantaged communities. Similar to AB 21, AB 30 creates an annual fee, in lieu of interest, on the State Water Pollution Control Revolving Fund Small Community Grant Fund for specific water projects in small communities. CWA’s Legislative Committee will consider these bills in the months ahead.

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In the last issue of the *Wrap*, I reported on the Assembly Committee assignments of interest to CWA member companies. Since then, Senate President Pro Tempore Steinberg has announced the relevant 2013-2014 Senate committee assignments, as follows:

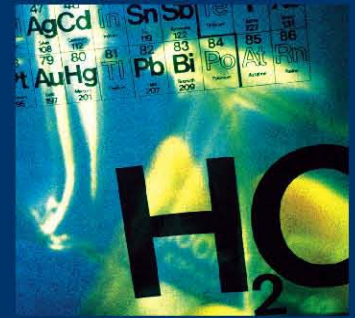
- Energy, Utilities & Communications: Padilla, Chair; Fuller, Vice Chair; Cannella, Corbett, de León, DeSaulnier, Hill, Knight, Pavley, Wolk, Wright
- Appropriations: de León, Chair; Walters, Vice Chair; Gaines; Hill; Lara; Padilla; Steinberg
- Natural Resources and Water: Pavley, Chair; Cannella, Vice Chair; Evans; Fuller; Jackson; Lara; Monning; Rubio; Wolk
- Governance and Finance: Wolk, Chair; Knight, Vice Chair; Beall; DeSaulnier; Emmerson; Hernandez; Leno; Liu.

CPUC Approves Park, Apple Valley Ranchos Water Credit Card Payments—

At its Jan. 10th Open Meeting, the California PUC approved Resolutions W-4935 and W-4936, which authorize Apple Valley Ranchos Water and Park Water, respectively, to add an option to their tariffs that will allow their customers to pay their water bills by credit or debit card. Specifically, both companies will amend Tariff Rule 9, Rendering and Payment of Bills to:

1. allow customers the option to receive electronically at no extra charge billing statements and legal and mandated notices;
2. offer an optional credit/debit card bill payment option to all customers;
3. exclude customers who have made fraudulent payments in the previous 12 months from the service;
4. give customers the option (at no additional cost) to receive regular bills for service electronically and to receive legally mandated notices electronically at the same time the customer receives the electronic bill; and
5. extend the dishonored check payment charge to all dishonored checks and electronic payments consistent with current Commission practice.

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Additionally, both companies will be permitted to charge a \$2.50 convenience fee charge per transaction for what is an optional service, all of which will be collected by the third party vendor when the customers remit payment for the bills. The water utilities will not receive any of this money.

The Commission also ordered both companies to file Tier 2 advice letters within 30 days to establish a credit card memorandum account to record all costs and savings associated with providing credit/debit card payment services. The balance in the memorandum account shall be refunded to all ratepayers in the companies' next general rate cases.

Department of Finance Slams CPUC in Audit— When the first sentence in the "Results" section of a management or performance audit begins, "We identified significant weaknesses ...," you know you're in trouble. And the California Dept. of Finance (DOF) spared no criticisms of the California PUC) in an audit report released Jan. 10th titled "California Public Utilities Commission Budget Process Performance Audit."

DOF's Office of State Audits and Evaluations completed a performance audit of the CPUC's budget process for the fiscal year 2012-13 and 2013-14 budget cycles. The cover letter noted that the CPUC's response and DOF's evaluation of that response were incorporated into the final report. Further, DOF stated that a detailed Corrective Action Plan (CAP) addressing the observations and recommendations is due within 90 days. The CAP should include milestones and target dates to implement all recommendations. The audit objectives were to:

- Evaluate whether CPUC's budget process for developing the fiscal year 2012-13 and 2013-14 Governor's Budgets results in reliable and accurate information to DOF, the Governor, Legislature, and other stakeholders.
- Evaluate the adequacy of CPUC's fund condition statement reconciliation process of the seven funds with variances (between State Controller's Office and DOF records) greater than \$1 million, to ensure accurate fund balances as of June 30, 2011.
- Provide recommendations to assist CPUC in strengthening its budgeting practices and procedures.

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DOF identified significant weaknesses within CPUC's budget operations that compromise its ability to prepare and present reliable and accurate budget information. Among them were:

- Ineffective management practices over budgeting functions
- Budget forecasting methodologies need improvement
- Budget monitoring practices needs improvement
- Fiscal management practices need improvement
- Appropriation adjustments may not be equitably allocated among funds
- Non-compliance with statutory requirements specific to the Division of Ratepayer Advocates

In addition, DOF said the CPUC's fund condition statement reconciliation process for the seven funds with \$1 million or greater variances as of June 30, 2011, lacked sufficient instructions from CPUC management, resulting in inconsistent and inadequately prepared reconciliations for five of the seven funds. However, most reasons for the variances were identified.

The report concluded that the CPUC must implement and strengthen the fiscal controls over its budgeting practices and procedures in order to produce reliable and accurate budgetary information for the Governor, the Legislature, Finance, and other stakeholders. To improve operations, CPUC must develop a corrective action plan within 90 days to address the observations and recommendations noted in this report.

I found the CPUC's response letter from Executive Director Paul Clanon to be one part mea culpa, one part chastened and one part politically astute. Paul said the CPUC agreed with 11 of the 12 critical "observations" made by the report. The only one the CPUC disagreed with involved a DOF assertion that the Commission violated PU Code Sec. 309.5 (c) because it didn't consider that the Executive Director's approval of the Division of Ratepayers' annual budgets to constitute "Commission" approval, as stated in the Code.

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In his letter, Clanon said, "We appreciate the thoroughness of the Audit and the constructive recommendations for improvements." He also said the Commission has "already begun mapping out our corrective actions to respond to the observations and recommendations with the goal of having completed the necessary changes in process and procedures, and documentation to address all recommendations, by the end of this calendar year. We look forward to providing you with a detailed corrective action plan that sets forth our specific implementation milestones over this transition year."

If you are interested in further details, you can access the report at http://www.dof.ca.gov/osae/audit_reports/documents/FinalReport-CaliforniaPublicUtilitiesCommissionPerformanceAuditWEB.pdf.

Agenda Highlights for the January 24th California PUC Open Meeting—

The CPUC has posted its agenda for the January 24th Open Meeting, which will be held from 9:00 a.m. to noon in the Commission Auditorium. Relevant water agenda items are summarized below. If you want to view any of the related documents, just copy and paste the website link into your Internet browser. You can listen to meeting by dialing **1-800-857-1917**. When prompted to enter a passcode, dial **92105**. You can also view the meeting at [video webcast](#).

Consent Agenda

Item 5 – Res W-4940; Division of Water and Audits Disposition Regarding California American Water Company's Advice Letter; Advice Letter (AL) No. 923 filed on November 15, 2011 and AL No. 932 filed on February 27, 2012 - Related matters. Proposed outcome:

- Affirms the Division of Water and Audit's letter of disposition rejecting California American Water Company's (Cal-Am) Advice Letter 923.
- Any future claims by Cal Am pursuant to Decision (D)10-12-016 should be accompanied by appropriate supporting documentations and mapping to the authorized projects in D10-12-016.

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- Cal Am's claim for \$236,516 including \$4,011 for Allowance for Funds Used During Construction (AFUDC), to be added to rate base is disallowed without prejudice.
- Cal Am may transfer to rate base \$480,105 which includes AFUDC of \$8,152 within 5 days after effective date of this Resolution.
- Authorizes Cal Am to file a supplement to Advice Letter 932 to modify the tariff sheets (6284-W through 6288-W) for the Monterey Tariff District and to reflect the transfer to rate base of the amount authorized in Ordering Paragraph No. 3.
- New rates to be effective 5 days after filing of the supplement to AL 932 subject to approval or rejection by DWA consistent with this Resolution.

Estimated cost: \$480,105.

<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=39009421>

Item 7 – Res W-4941; Cold Springs Water Company's General Rate Increase to Produce Additional Annual Revenue for Test Year 2012.

Advice Letter 57 filed on April 25, 2012 - Related matters. Proposed outcome:

- To file a supplemental Advice Letter (AL) with the revised rate schedule attached to the Resolution as Appendix B.
- Adopts the quantities in Appendix D used to develop the Division of Water and Audit's recommendations.
- Authorizes the utility to file a Tier 2 AL within 30 days from effective date of resolution to collect over a twenty-four month period the under-collected revenues from April 25, 2012, the interim rate date, to the effective date of the new rates established in this Resolution.

Safety Considerations: Authorizes a test-year revenue requirement in order to provide safe and reliable water service. Estimated cost: \$73,471 or 35.44%.

<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=34143365>

Item 15 - A08-05-019; Order Extending Statutory Deadline. Application of California Water Service Company for an order confirming its discontinuance of the ESP program as provided in D.07-12-055, Ordering Paragraph 19, approving accounting for the residual affiliate transaction, and confirming under D.07-12-055, Ordering Paragraph 16 that Applicant's residual services to its

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affiliate CWS Utility Services comply with applicable law. Proposed outcome: Extends statutory deadline for resolving this proceeding to March 25, 2013. Safety considerations: It is the utility's responsibility to adhere to all Commission rules, decisions, General Orders and statutes including Pub. Util. Code Section 451 to take all actions "...necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public." Estimated cost: None. (Comr Florio - ALJ McKinney)

<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=42175799>

Item 22 – A12-05-010; Garrapata Water Company to Transfer Assets to California American Water Company. Application of California-American Water Company and Garrapata Water Company for an Order Authorizing Garrapata Water Company to Sell and California-American Water Company to Purchase the Assets of Garrapata Water Company. Proposed outcome:

- Approves acquisition to Garrapata Water by California American Water Company.
- Closes the proceeding.

Safety Considerations: It is the utilities' responsibility to adhere to all Commission rules, decisions, General Orders and statutes including Pub. Util. Code Section 451 to take all actions "...necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

Estimated cost: \$50,000. (Comr Sandoval - ALJ Farrar)

<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=42159658>

Regular Session – Legal Division Matters

Item 36 – Resolution L-436; New Regulations Regarding Disclosure of Records and Requests of Confidential Treatment of Records. Interim Resolution regarding adoption of new regulations regarding public access to records of the California Public Utilities Commission and requests for confidential treatment of records. [Note: this item will be held]

<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=39595523>

Regular Agenda – Legislative and Other Matters

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Item 41 (Rev.) – Proposed Legislation on Certificates of Public Convenience and Necessity. This bill would revise the statutory cap on fees necessary to obtain a certificate of public convenience and necessity from the California Public Utilities Commission to adjust for inflation. (Recommended Position: Support as Sponsor). 01/17/2013 - This revision was not shown on the Agenda mailed to the public.

Item 45 (Rev.) – Proposed Legislation on Utility Receivership. This bill would authorize the California Public Utilities Commission to directly appoint a receiver in cases where a water or sewer corporation is unable or unwilling to adequately serve its ratepayers. (Recommended Position: Support as Sponsor). 01/17/2013 - This revision was not shown on the Agenda mailed to the public.

Regular Agenda – Commissioner Reports

Item 46 – President Peevey Report. President Michael R. Peevey's Nomination of Commissioner Catherine J.K. Sandoval to the California Public Utilities Commission Low Income Oversight Board. This item is for Commission vote.

Closed Session

Item 49 – A10-01-012; Conference with Legal Counsel - Application for Rehearing. Disposition of the application for rehearing of Decision (D) 11-03-035 (Decision) filed by the Monterey Peninsula Water Management District (the District). In D11-03-035, the Commission considered a California-American Water Company (Cal-Am) application, and subsequent proposed settlement agreement between Cal-Am, the District, and the Division of Ratepayer Advocates (DRA).

Both the application and proposed settlement recommended approval of a District User Fee set at 8.325% of Cal-Am's total revenue. Cal-Am would collect the User Fee in its Monterey customer rates and remit those costs to the District for its cost to implement the Carmel River Mitigation and Aquifer Storage and

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Recovery Programs. The Decision rejected the proposed settlement and authorized Cal-Am to amend its application with additional information to support the proposal.

Gov. Code § 11126(e)(2)(B)(i), allows this item to be considered in Closed Session.

Upcoming Industry Meetings/Conferences/Events:

- January 24, 2013 – California PUC Open Meeting (9:00a–12 :00p; 505 Van Ness Ave., San Francisco 94102)
- January 26, 2013 – California Water Law Symposium (8:00a – 5:00p, University of California-Davis; Conference Center); J. Hawks will attend.
- January 30, 2013 – Department of Water Resources – Urban Stakeholder Committee Meeting (9:30a – 3:30p; ACWA HQ; 901 K. St., Sacramento); J. Hawks will attend.
- February 1, 2013 – CWA Public Information Committee Monthly Conference Call (1:30p – 2:30p; 1.888.398.2342; 6868916#)
- February 3-6, 2013 – National Association of Regulatory Utility Commissioners Winter Committee Meetings (9:00a – 5:00p, Feb. 3-6; Renaissance Washington Hotel; 999 9th St., N.W., Washington, DC 20001); J. Hawks will attend.
- February 7, 2013 – CWA Legislative Committee Monthly Conference Call (3:30p – 4:30p; 1.800.250.2600; 86936245#).
- February 12, 2013 – CWA Directors and Executive Committee Meeting (9:30a – 3:30p; California Water Association; 601 Van Ness Ave., Suite 2047, San Francisco 94102).
- February 13, 2013 (Wednesday)– California PUC Open Meeting (9:00a–12 :00p; 505 Van Ness Ave., San Francisco 94102)
- February 13, 2013 – California Urban Water Conservation Council Board of Directors Meeting (9:30a – 3:00p; MWD of Orange County - 18700 Ward St., Fountain Valley, CA 92708); J. Hawks will attend.
- February 14, 2012 – California Water Plan Update 2013 Advisory Committee Meeting (8:45a – 4:30p; Department of Public Health, East End Complex Training Rooms, 1500 Capitol Avenue, Sacramento 95814); J. Hawks will attend.

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- February 20, 2013 – California PUC Low-Income Oversight Board Water Subcommittee Meeting (10:00a 12:00 noon; Hearing Room D; California PUC; 505 Van Ness Ave., San Francisco 94102); J. Hawks will attend.
- February 20-22, 2013 – Urban Water Institute Spring Conference (Hilton Hotel, 400 East Tahquitz Canyon Way, Palm Springs 92262)
- February 27, 2013 – California PUC Low Income Oversight Board Meeting (10:00a – 4:00p; City of Burbank City Council Chambers; 275 East Olive Ave., 2nd Floor, Burbank 91502); J. Hawks will attend.
- February 28, 2013 – California PUC Open Meeting (9:00a–12 :00p; 505 Van Ness Ave., San Francisco 94102)
- March 7, 2013 – CWA Legislative Committee (In-person) Meeting – Review of Introduced Legislation (10:00a-3:00p; Nossaman Office; 621 Capitol Mall, 25th Floor, Sacramento 95814)

—CWA—