

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



October 7, 2025

Gladys Estrada
Regulatory Affairs Dept.
Golden State Water Company
630 East Foothill Blvd.
San Dimas, CA 91773

Dear Ms. Estrada,

The Water Division of the California Public Utilities Commission has approved Golden State Water Company's Advice Letter No. 1969-A, (Supplement to Advice Letter No. 1969), filed on September 30, 2025, regarding transfer of PFAS Contamination Settlement Funds.

Enclosed is a copy of the advice letter with an effective date of September 30, 2025 for the utility's files.

Please contact Alex Pineda at Alex.Pineda@cpuc.ca.gov, if you have any questions.

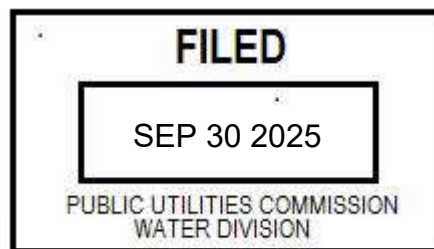
Thank you.

Enclosures



September 30, 2025

Advice Letter No. 1969-WA



SUPPLEMENT

(U 133 W)

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

This advice letter filing is being made to request the transfer of funds, explained in the Background section of this advice letter, to Orange County Water District (OCWD) to cover the cost of the PFAS remediation to GSWC facilities, per the PFAS Facilities and Program Agreement (PFAS PA).

Supplemental

This supplemental advice letter is being filed as a result of Water Division's staff review. D.10-12-058 revises D.10-10-018, in part, to allow this advice letter to be submitted via a Tier 2 designation, instead of a Tier 3, because it "provides a more appropriate level of scrutiny". The Tier 2 designation removes the requirement for a Commission resolution for the disposition of this advice letter. This filing will replace Advice Letter No. 1969-W in its entirety.

Background

On April 8, 2021, GSWC executed the PFAS Facilities and Program Agreement (PFAS PA) with Orange County Water District (OCWD), the agency responsible for managing the groundwater basin underlying north and central Orange County (OC Basin). There are currently fifteen (15) major groundwater producers (Producers), including GSWC, together with OCWD, that are Parties to the PFAS PA.

The PFAS PA establishes the responsibility of the Parties and sets terms and conditions for OCWD to take the lead in mitigating PFAS contamination in the OC Basin. It provides the basis for OCWD to fund the planning, design, and construction of PFAS treatment facilities (PFAS Facilities), and to reimburse fifty percent (50%) of the ongoing operation and maintenance costs (O&M) for these PFAS Facilities at groundwater production plant sites owned and operated by the Producers.

OCWD is funding PFAS Facilities through grants, short-term and long-term financing, low interest loans, and with funds recovered through PFAS lawsuits filed on behalf of the Producers and OCWD. The debt financing used for construction and operation of the PFAS

Facilities in the OC Basin is serviced through incremental increases in the annual Replenishment Assessment (RA) and Additional Replenishment Assessment (ARA), collected by OCWD from its Producers over time. These charges are passed on to the Producers' customers through their respective water rates.

The PFAS PA establishes terms, conditions and expectations for OCWD and the Producers to collaborate in seeking grants and in filing lawsuits against the parties responsible for PFAS contamination in the OC Basin. It further establishes expectations for the Parties to pool funds recovered by PFAS lawsuits to pay down the primary capital costs and ongoing O&M expenses for the PFAS Facilities funded by OCWD through the 30-year term of the PFAS PA.

Participation in the PFAS PA provides GSWC customers with a significant benefit in that the cost of alternative water supplies, i.e. treated import water, is significantly more expensive than treated groundwater supplies. In addition, if less groundwater is produced across the OC Basin due to PFAS contamination, groundwater rates would rise significantly to cover OCWD's fixed costs in protecting the basin water quality and sustainable yield. If GSWC financed PFAS projects in its OC District outside of the PFAS PA, its customers would still pay for the OCWD PFAS Program through the increased RA and ARA, and they would pay for GSWC's investment in PFAS Treatment through the rate base, effectively paying twice for PFAS Treatment Facilities.

GSWC currently operates two PFAS Facilities in its Orange County District that were funded through the OCWD PFAS PA, with contributed assets of over \$4.2M. OCWD has received bids to construct a third PFAS Facility in GSWC's OC District, valued at approximately \$3.1M. OCWD is currently preparing plans and specifications for construction of PFAS Treatment Facilities at five additional GSWC plant sites in Orange County, estimated at nearly \$20M.

In August 2025, GSWC received its first settlement payment from one of the major defendants of a Multidistrict Litigation (MDL) against PFAS manufacturers. This payment included approximately \$1.1M in settlement funds for GSWC groundwater wells within the OC Basin contaminated by PFAS compounds. The MDL settlement with this defendant allows payments to be made over a period of nine years. During this nine-year period, GSWC expects to receive and forward to OCWD approximately \$5.5M in litigation recovery funds from this defendant.

In accordance with the terms, conditions and obligations established by the PFAS PA, GSWC will forward to OCWD, the settlement funds associated with PFAS-affected wells in the OC District. These funds will be pooled with settlement funds from other Producers and distributed by OCWD across the Parties, in accordance with the terms and conditions established by the PFAS PA, its addenda, and any other associated agreements executed by the Parties. The bulk of these pooled settlement funds will pay down the cost of the PFAS

Facilities capital investment from OCWD and thereby reduce the amount needed for repayment and financing through increases in the RA and ARA.

Request

Pursuant to D.10-10-018, Ordering Paragraph 4¹, GSWC requests to transfer litigation settlement proceeds from the PFAS Contamination Litigation Proceeds Memorandum Account received from defendants of a Multidistrict Litigation (MDL) against PFAS manufacturers, for groundwater wells within the OC Basin that are contaminated by PFAS compounds. The transfer of these funds to OCWD will partially offset the cost of remediation under the PFAS Treatment Facilities Program mentioned above.

GSWC is currently operating PFAS Facilities funded by the OCWD PFAS PA at two of its plant sites in the Orange County District.

The settlement proceeds will partially offset OCWD's cost to install and operate needed PFAS treatment facilities that would have normally been funded by GSWC ratepayers.

As additional PFAS settlement payments are received by GSWC for wells affected by PFAS contaminants in the OC Basin, GSWC will continue to transfer the settlement funds to OCWD in exchange for the contributed PFAS Facilities completed at GSWC Plant sites in its OC District through the PFAS PA. The estimated settlement payments for GSWC wells in the OC Basin total \$5.5M from the largest defendant. The estimated OCWD investment in PFAS Water Treatment Facilities at GSWC's OC District plant sites is \$27.3M.

GSWC requests the authority to file a Tier 1 advice letter, instead of a Tier 2, based on the approval granted by this advice letter request for any future settlement payments to OCWD under the PFAS PA. This will expedite the payment transfers to OCWD for well remediation of PFAS contaminants.

Tier Designation

Pursuant to D.10-12-058 this advice letter is submitted with a Tier 2 designation. GSWC request an effective date of September 30, 2025.

Customer Notice

Pursuant to Water Industry Rule No. 3.2 in the Commission's General Order 96-B, this advice letter does not require customer notice.

¹ 4. When contamination proceeds arising from damage awards, settlements, government order or insurance are initially received from the funding source, they shall be placed in a memorandum account until the need for making expenditures arises, whereupon an approval to transfer the proceeds to the appropriate dedicated 265 sub-account shall be sought by a Tier 3 advice letter filing.

Response or Protest

Anyone may respond to or protest this advice letter (AL). When submitting a response or protest, please include the utility name and advice letter number in the subject line. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter. A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

1. The utility did not properly serve or give notice of the AL;
2. The relief requested in the AL would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
3. The analysis, calculations, or data in the AL contain material error or omissions;
4. The relief requested in the AL is pending before the Commission in a formal proceeding; or
5. The relief requested in the AL requires consideration in a formal hearing, or is otherwise inappropriate for the AL process; or
6. The relief requested in the AL is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require re-litigating a prior order of the Commission.

A protest may not rely on policy objections to an AL where the relief requested in the AL follows rules or directions established by statute or Commission order applicable to the utility. A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

A response or protest must be made in writing or by electronic mail and must be received by the Water Division (WD) within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

California Public Utilities Commission
Water Division
505 Van Ness Avenue
San Francisco, CA 94102
E-mail: Water.Division@cpuc.ca.gov

On the same day the response or protest is submitted to WD, the respondent or protestant shall send a copy by mail (or e-mail) to GSWC at the following address:

Golden State Water Company
Attn: Gladys Estrada
630 East Foothill Blvd.
San Dimas, CA 91773
E-mail: regulatoryaffairs@gswater.com

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform WD, within the 20-day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

Replies

The utility shall reply to each protest and may reply to any response. Any reply must be received by WD within five business days after the end of the protest period, and shall be served on the same day on each person who filed the protest or response to the AL.

The actions requested in this advice letter are not now the subject of any formal filings with the California Public Utilities Commission, including a formal complaint, nor action in any court of law.

No individuals or utilities have requested notification of filing of tariffs. Distribution of this advice letter is being made to the attached service list in accordance with General Order No. 96-B.

Sincerely,

/s/ Gladys Estrada

Gladys Estrada
Regulatory Analyst

cc: Wilson Tsai - Water Division
Alex Pineda - Water Division
Richard Rauschmeier - Public Advocates
Victor Chan- Public Advocates

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

Apple Valley Ranchos Water Co.
Tony Pena – General Manager
21760 Ottawa Road
P.O. Box 7005
Apple Valley, CA 92308
tpenna@avrwater.com

Director of Public Services
Town of Apple Valley
14955 Dale Evans Parkway
Apple Valley, CA 92307

California Department of Corrections
P. O. Box 5001
7018 Blair Road
Calipatria, CA 92233

Calif. Dept. Forestry Headquarters
3800 N. Sierra Way
San Bernardino, CA 92405

County Water
222 W. Hospitality Lane, 2nd Floor
San Bernardino, CA 92408
info@sdd.sbcounty.gov

East Pasadena Water Co.
3725 Mountain View Avenue
Pasadena, CA 91107

Tyler Salcido, Executive Officer
LAFCO
1122 W. State Street, Suite D
El Centro, CA 92243-2840
tylers@iclafo.com

Barlen Mutual Water
P.O. Box 77
Barstow, CA 92311

California American Water
4701 Beloit Drive
Sacramento, CA 95838-2434
ca.rates@amwater.com

Calif. Dept. of Forestry
7105 Airway Drive
Yucca Valley, CA 92284

Daggett Community Service
P. O. Box 308
Daggett, CA 92327
Daggettcsd@aol.com
(619) 254-2415

East Orange County Water District
185 N. McPherson Road
Orange, CA 92869-3720
David Youngblood: dyoungblood@eocwd.com
Sylvia Prado: sprado@eocwd.com
ech2o@eocwd.com

Imperial County Board of Supervisors
Attn: Supervisor John Hawk, District 5
County Administration Center
940 W. Main St, #209
El Centro, CA 92243-2871
johnhawk@co.imperial.ca.us

Juniper Riviera CWD
P O Box 618
Lucerne Valley, CA 92356

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

Local Agency Formation Commission
215 North D Street – Suite 204
San Bernardino, CA 92415-0490
lafoo@lafoo.sbcounty.gov

Morongo Valley Community
Service District
P. O. Box 46
Morongo Valley, CA 92256

Park Water Company
9750 Washburn Road
Downey, CA 90241

San Gabriel County Water Co.
8366 Grand Avenue
Rosemead, CA 91770
Jim@sgcwg.com

Seeley County Water District
P.O. Box 161
Seeley, CA 92273

Sheep Creek Water Company
P. O. Box 291820
Phelan, CA 92329-1820
Attn: Chris Cummings
sheepcreek@verizon.net

Twentynine Palms Water Dist.
72401 Hatch Rd. (P.O. Box 1735)
Twentynine Palms, CA 92277
(619) 367-7546
mshragge@29palmswater.org

Walnut Valley Water Dist.
271 S. Brea Canyon Road
Walnut, CA 91789

Mariana Ranchos County Water District
9600 Manzanita Street
Apple Valley, CA 92308
MarianaCWD@mrcwd.org

Navajo Mutual Water Company
P. O. Box 392
Apple Valley, CA 92307-392
Gmmnwc@gmail.com

Rancheritos Water Co.
P.O. Box 348
Apple Valley, CA 92307
(619) 247-3730
RMWC1954@gmail.com

San Gabriel Valley Water Co.
11142 Garvey Blvd.
El Monte, CA 91732
ratesdepartment@sgvwater.com

Serrano Water Dist. - Villa Park
18021 East Lincoln Street
Villa Park, CA 92667

Sunny Slope Water Co.
1040 El Campo Drive
Pasadena, CA 91107-5506
Ken@sunnyslopewatercompany.com
Karen@sunnyslopewatercompany.com

Victor Valley Water District
14343 Civic Drive
P. O. Box 5001
Victorville, CA 92392

Water Issues Committee
Wrightwood Property Owners Assoc.
P. O. Box 487
Wrightwood, CA 92397

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

City of Anaheim
City Clerk's Office
200 S. Anaheim Blvd. – Suite 217
Anaheim, CA 92805

City of Arcadia Water Co.
240 W. Huntington Drive
P.O. Box 60021
Arcadia, CA 91066-6021

City of Alhambra Utilities Dept.
111 S. First Avenue
Alhambra, CA 91801

City of Brawley Water Co.
400 Main Street
Brawley, CA 92227
TSalcido@Brawley-ca.gov

City of Brea
Water Department
#1 Civic Center Drive
Brea, CA 92621

City of Buena Park
6650 Beach Boulevard
Buena Park, CA 90620

City of Calexico Water Co.
608 Heber Avenue
Calexico, CA 92231
saldanaj@calexico.ca.gov

City of Covina
534 Barranca Avenue
Covina, CA 91723
CMarcarello@covinaca.gov

City of El Centro Water Co
307 W. Brighton
El Centro, CA 92243

City of El Monte Water Co.
11333 Valley Blvd.
El Monte, CA 91732
jmussenden@ci.el-monte.ca.us

City of Fullerton Water
Fullerton Water Department
303 W. Commonwealth Avenue
Fullerton, CA 92631
garh@ci.fullerton.ca.us

City of Garden Grove
13802 Newhope Street
Garden Grove, CA 92643
zackb@ci.garden-grove.ca.us

City of Glendora
116 E. Foothill Blvd.
Glendora, CA 91740

Herber Public Utility District
P. O. Box H
Heber, CA 92249

City of Hesperia Water Department
9700 Seventh Avenue
Hesperia, CA 92345
jwymman@cityofhesperia.us

City of Imperial - Water Department
420 S. Imperial Avenue
Imperial, CA 92251

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

City of La Palma
7822 Walker Street
La Palma, CA 90623
Attn: Jeff Moneda, PW Director

City of La Verne Water Department
3660 "D" Street
La Verne, CA 91750
Jvieyra@cityoflaverne.org
Areyes@cityoflaverne.org
rciotti@cityoflaverne.org
cityclerk@cityoflaverne.org

Monte Vista Water District
10575 Central Avenue
Montclair, CA 91763
boardsecretary@mvwd.org

City of Monterey Park Water Co.
320 W. Newmark Avenue
Monterey Park, CA 91754
rgonzales@montereypark.ca.gov

City of Monrovia Water Co.
415 S. Ivy Avenue
Monrovia, CA 91016

City of Orange Water Dept.
189 South Water Street
Orange, CA 92866
idefrancesco@cityoforange.org

City of Pomona Water Department
505 S. Garey Avenue
Pomona, CA 91766

Interim Water Resources Director
City of Pomona
752 W. Commercial Street
Pomona, CA 91768

City of San Dimas
245 E. Bonita Avenue
San Dimas, CA 91773
dblack@sandimasca.gov
bmckinney@sandimasca.gov

City of Santa Ana Water
20 Civic Center Plaza
Santa Ana, CA 92702
ryhernandez@santa-ana.org

City of Seal Beach
211 Eight Street
Seal Beach, CA 90740

City of Upland Water Dept.
460 N. Euclid Avenue
Upland, CA 91786
BYu@uplandca.gov
JRobles@ci.upland.ca.us
MMadriz@ci.upland.ca.us

City of West Covina Water Dept.
825 S. Sunset Avenue
West Covina, CA 91790

City of Westminster
8200 Westminster Boulevard
Westminster, CA 92683
nleal@westminster-ca.gov
ranaya@westminster-ca.gov
tgillespie@westminster-ca.gov

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

Steve Conklin, Acting General Manager
Yorba Linda Water District
1717 E. Miraloma Avenue
Placentia, CA 92870
Sconklin@ylwd.com
RWeston@ylwd.com

City Attorney
City of Arcadia
240 West Huntington Drive
Arcadia, CA 91006
cityattorney@arcadiaca.gov

City Attorney
City of Barstow
222 East Mountain View Street
Barstow, CA 92311

City Attorney
Oswalt & Associates
Mr. William (Bill) Smerdon
P. O. Box 607
Imperial, CA 92251

City Attorney
City of Claremont
P. O. Box 880
Claremont, CA 91711

City Attorney
City of Covina
125 E. College Street
Covina, CA 91723

City Attorney
City of Cypress
5275 Orange Avenue
Cypress, CA 90630

City Attorney
City of Duarte
1600 Huntington Drive
Duarte, CA 91010
jmelching@rutan.com

City Attorney's Office
City of El Monte
11333 Valley Blvd.
El Monte, CA 91731-3293

City Attorney
City of La Palma
7822 Walker Street
La Palma, CA 90680

City Attorney
City of La Verne
3660 D Street
La Verne, CA 91750

Administrative Services Director
City of Los Alamitos
3191 Katella Avenue
Los Alamitos, CA 90720
WQuintanar@cityoflosalamitos.org
CKoehler@cityoflosalamitos.org

City Attorney
City of Monrovia
415 South Ivy Avenue
Monrovia, CA 91016
csteele@rwglaw.com

City Attorney
City of Montclair
5111 Benito Avenue
Montclair, CA 91763
der@robbinsholdaway.com

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

City Attorney, Karl H. Berger
Burke, Williams & Sorensen, LLP
City of Monterey Park
444 S. Flower Street, Suite 2400
Los Angeles, CA 90071
Kberger@bwslaw.com

City Attorney
City of Placentia
401 East Chapman Avenue
Placentia, CA 92670

City Attorney, Rachel Richman
City of Rosemead
8838 E. Valley Blvd.
Rosemead, CA 91770

City Attorney
City of San Gabriel
425 S. Mission Drive
San Gabriel, CA 91776

City Attorney
City of Stanton
7800 Katella Avenue
Stanton, CA 90680
publicworks@stantonca.gov
stanton@stantonca.gov

City Attorney
City of Yorba Linda
4845 Casa Loma Avenue
Yorba Linda, CA 92886-3364

City Clerk
City of Barstow
222 E. Mountain View St., Suite A
Barstow, CA 92311
aflores@barstowca.org
mhernandez@barstowca.org

City Attorney
City of Orange
300 E. Chapman Avenue
Orange, CA 92666

City Attorney
City of Pomona
505 S. Garey Avenue
Pomona, CA 91766

City Manager
City of San Dimas
245 East Bonita Avenue
San Dimas, CA 91773
cconstantin@sandimasca.gov

City Attorney
City of Seal Beach
211 8th Street
Seal Beach, CA 90740
csteele@rwqlaw.com

City Attorney
City of Temple City
5938 Kaufman
Temple City, CA 91780

City Council
City of Calipatria
125 N. Park Avenue
Calipatria, CA 92233

City Clerk
City of Claremont
P. O. Box 880
Claremont, CA 91711
sdesautels@ci.claremont.ca.us

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

Community Services Director, Jeremy Swan
City of Claremont
1616 Monte Vista Avenue
Claremont, CA 91711
jswan@ci.claremont.ca.us

City Clerk
City of Covina
125 East College Street
Covina, CA 91723

City Clerk
City of Cypress
5275 Orange Avenue
Cypress, CA 90630
adm@cypressca.org
pgrant@cypressca.org

City of Duarte
1600 Huntington Drive
Duarte, CA 91010
Andres Rangel, Assistant to the City Manager
arangel@accessduarte.com

City Clerk
City of El Monte
11333 Valley Blvd.
El Monte, CA 91731-3293

City Clerk
City of Irwindale
5050 N. Irwindale Avenue
Irwindale, CA 91706
cityclerk@irwindaleca.gov

City Clerk
City of La Palma
7822 Walker Street
La Palma, CA 90680

City Clerk
City of Los Alamitos
3191 Katella Avenue
Los Alamitos, CA 90720
WQuintanar@cityoflosalamitos.org

City Clerk
City of Monrovia
415 South Ivy Avenue
Monrovia, CA 91016

City Clerk
City of Montclair
5111 Benito Avenue
Montclair, CA 91763
CityClerk@CityofMontclair.org

City Clerk
City of Orange
300 E. Chapman Avenue
Orange, CA 92666
Cperez@cityoforange.org

City Clerk
City of Placentia
401 East Chapman Avenue
Placentia, CA 92670
cmartinez@placentia.org

City of Rosemead
8838 E. Valley Boulevard
Rosemead, CA 91770
EHernandez@CityofRosemead.org
NHaworth@CityofRosemead.org

City Clerk's Department
City of San Gabriel
425 S. Mission Drive
San Gabriel, CA 91776
CityClerk@sgch.org

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

City Clerk
City of Seal Beach
211 8th Street
Seal Beach, CA 90740
PGallegos@sealbeachca.gov
TKelsey@sealbeachca.gov

City Manager
City of Temple City
9701 Las Tunas Drive
Temple City, CA 91780

County Counsel
County of San Bernardino
385 N. Arrowhead Avenue, 2nd Floor
San Bernardino, CA 92415-0140

County Clerk
County of Orange
12 Civic Center Plaza
Santa Ana, CA 92702

County Clerk
County of San Bernardino
222 West Hospitality Lane
San Bernardino, CA 92415-0022

Downey Brand LLP
455 Market Street, Suite 1500
San Francisco, CA 94105
wcordero@downeybrand.com
tmacbride@DowneyBrand.com
mday@DowneyBrand.com

Liberty Utilities (California)
9750 Washburn Road
Downey, CA 90241
AdviceLetterService@LibertyUtilities.com
Dan.Marsh@libertyutilities.com
Kelsey.Wren@libertyutilities.com
Tiffany.Thong@libertyutilities.com

City Clerk, Patricia A. VaZquez
City of Stanton
7800 Katella Avenue
Stanton, CA 90680
PVaZquez@StantonCA.gov

City Clerk
City of Yorba Linda
4845 Casa Loma Avenue
Yorba Linda, CA 92686-3364
mbrown@yorba-linda.org

Chamber President
Niland Chamber of Commerce
P. O. Box 97
Niland, CA 92257

County Counsel
County of Orange
333 W. Santa Ana Blvd., 4th Floor
Santa Ana, CA 92701

County of San Bernardino
Water and Sanitation Area
P. O. Box 5004
Victorville, CA 92393-5004
Janine.valenzuela@sdd.sbcounty.gov

Naval Facilities Engineering Command
Rea D. Estrella
Southwest Division
1220 Pacific Highway
San Diego, CA 92132
Rea.estrella@navy.mil

Scott Blaising, Attorney
Braun Blaising & Wynne, P. C.
555 Capitol Mall, Suite 570
Sacramento, CA 95814
blaising@braunlegal.com

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

Local Agency Formation Commission

80 South Lake Avenue, Suite 870

Pasadena, CA 91101

pnovak@lalafco.org

aromo@lalafco.org