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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of California-American Water
Company (U210W) for Approval of the
Monterey Peninsula Water Supply Project and
Authorization to Recover All Present and Future
Costs in Rates

A.12-04-019
(Filed April 23, 2012)

REBUTTAL TESTIMONY OF JEFFREY T. LINAM

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Dated: March 22, 2016

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REBUTTAL TESTIMONY OF JEFFREY T. LINAM

I. WITNESS QUALIFICATIONS

- Q1. Please state your name, business address and telephone number.
- A1. My name is Jeffrey T. Linam. My business address is 1033 B Avenue, Suite 200, Coronado, CA 92118. My telephone number is (619) 522-6376.
- Q2. Have you previously supplied your qualifications in this proceeding?
- A2. Yes, I provided my qualifications in my Direct Testimony in this proceeding which was served on April 23, 2012.
- Q3. Are there any changes to your qualifications?
- A3. Yes. My current title is Director of Rates for California American Water. My previous title was Director of Finance.

II. INTRODUCTION AND PURPOSE OF TESTIMONY

- Q4. What is the purpose of your rebuttal testimony?
- A4. The purpose of my rebuttal testimony is three fold: 1) provide some updates to the MPWSP financial model and comparative life cycle costs, 2) make corrections or

1 clarifications to some of the positions or statements made by the Office of Ratepayer
2 Advocates (“ORA”) in their January 22, 2016 Supplemental Testimony, and 3) address
3 the comments of the Monterey Peninsula Water Management District (“MPWMD”) and
4 ORA in their respective Supplemental Testimony, submitted on January 22, 2016.

5
6 **III. UPDATES TO THE MPWSP FINANCIAL MODEL**

7 Q5. Are there any updates that need to be made to the MPWSP financial model and
8 comparative life cycle costs that were presented in your Supplemental Testimony
9 submitted on January 22, 2016?

10 A5. Yes. The financial model that was used to calculate the Year 1 revenue requirement and
11 net present value (“NPV”) of the life cycle costs for the two alternative cases was titled
12 “2015 Monterey Desalination Model v8.4.” This model was made available to parties in
13 this proceeding upon request and I had separate meetings with ORA and MPWMD staff
14 to go over the details of the model. The review of the financial model included the
15 calculations related to the cost comparison and life cycle costs for the 9.6 million gallons
16 per day (“MGD”) scenario and the 6.4 MGD plant with Groundwater Replenishment
17 (“GWR”) scenario. A correction to the model was discussed with MPWMD General
18 Manager, David Stoldt. Specifically, the worksheet that calculates the annual operations
19 and maintenance (“O&M”) costs for the GWR project referenced an incorrect escalation
20 rate. The implications are that the GWR power costs escalate at 4.8% per year regardless
21 of the power escalation assumption. California American Water assumed a power
22 escalation of 3.0% for the base case comparison. The result of correcting the reference in
23 the GWR O&M worksheet is that it reduces the difference between the NPV life cycle
24 costs between the two alternative by \$6.7 million. The difference in the NPV life cycle
25 costs between the 9.6 MGD plant and the 6.4 MGD Plant with GWR is \$26.3 million
26 with the life cycle costs of \$687.3 million and \$713.6 million for the large and small
27 plants, respectively. It also necessitates a change to Attachments 4 and 5 that were
28 submitted with my January 22, 2016 Supplemental Testimony. I have included as

1 Attachment 4A and Attachment 5A, revised comparative schedules.¹

2
3 Q6. Are there any additional changes that are needed to the MPWSP financial model?

4 A6. Yes. As described in the January 22, 2016 Supplemental Testimony of Mr. Richard
5 Svindland, the Year 1 revenue requirement does not include a lease payment for the
6 outfall costs, but rather the capital costs related to the desalination plants include \$2.6
7 million for capacity charges along with other capital improvements to be paid to the
8 Monterey Regional Water Pollution Control Agency (“MRWPCA”). This is due to the
9 fact that the terms and pricing of the contract still need to be negotiated. California
10 American Water does not agree, nor does it necessarily support, an annual outfall lease
11 payment of \$829,000 and \$860,000 for the 6.4 MGD and 9.6 MGD plants, respectively,
12 in Year 1. These outfall lease payment costs were not reflected in the Year 1 revenue
13 requirement numbers submitted with my Supplemental Testimony on January 22, 2016.
14 However, these costs were included in the life cycle analysis submitted on January 22,
15 2016 to include amounts estimated by MPWMD for comparison purposes only. If the
16 outfall lease payments are excluded, the NPV life cycle costs would be \$672.7 million
17 and \$699.5 million for the large plant and small plant with GWR, respectively. This
18 would result in a difference of \$26.8 million.

19
20 Q7. Are there any other changes that California American Water proposes to the MPWSP
21 financial model, Year 1 revenue requirement or life cycle analysis?

22 A7. No.

23
24
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27 _____
28 ¹ The correction to the power cost escalation for GWR does not impact the Year 1 revenue requirement or cash flow for the project construction that was provided in Attachment 1 and 2 to my January 22, 2016 supplemental testimony.

1 **IV. CORRECTIONS TO ORA’S POSITIONS**

2 **A. Cost Certainty Under the Water Purchase Agreement**

3 Q8. Do you agree with ORA’s claim that there would be greater cost certainty under the
4 GWR project?

5 A8. No. I am not sure how ORA reaches its conclusion. Page 6 of the ORA testimony states,
6 “A WPA [water purchase agreement] with a purchase price or a defined methodology for
7 calculating prices for water from GWR with an associated price cap would provide
8 significantly more cost certainty.” First, Richard Svindland has discussed the level of
9 certainty on capital costs for the desalination plant sizes. California American Water has
10 gone through an extensive request for proposal (“RFP”) process and awarded final bids
11 for most of the components of the desalination project. Second, the purchased water
12 costs to California American Water from the GWR plant will be based on the sum of the
13 fixed project costs and project O&M costs to produce the water. If there is a capital cost
14 overrun or if operating costs increase, those will be passed on to California American
15 Water customers through higher unit water cost. The WPA does not establish a long term
16 fixed price. MPWMD may choose to adjust prices on an annual or periodic basis and
17 California American Water will file an advice letter to adjust rates for the purchased
18 water offset, just as it does in its other districts. Third, the WPA does not include a price
19 cap. California American Water, MPWMD and MRWPCA are all working to provide
20 greater price certainty for the respective projects.

21
22 Q9. Has ORA accurately described the cost caps that apply to the desalination facilities?

23 A9. Not exactly. Section 6.7 of the July 31, 2013 Settlement Agreement, Attachment A,
24 describes two cost caps. ORA is correct that the cost caps are not absolute. If California
25 American Water’s costs exceed the initial cost cap, it may seek recovery for reasonable
26 and prudent costs above the caps by filing a Tier 2 advice letter. If California American
27 Water’s costs exceed the higher cap, it will file a petition for modification with the
28 Commission for recovery.

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B. Return Water

Q10. ORA states that there could be significant customer cost impacts as a result of uncertainty around the return water that is required as a result of the Agency Act. Has California American Water prepared an analysis of the possible impacts from a higher level of brackish groundwater?

A10. Yes. The supplemental testimony that I provided on January 22, 2016 provided the financial impacts should the test well salinity remain at the current level of 92.5% rather than the design criteria of 96.0%. The supplemental testimony of Richard Svindland provides the analysis and cost information, and the rebuttal testimony of Richard Svindland explains that the desalination plant’s size and the costs as currently estimated can accommodate various return obligation scenarios. Attachment 5 of my supplemental testimony provides the impact to the Year 1 revenue requirement and the impact to the net present value of the lifecycle costs. This scenario reduces the Year 1 revenue requirement gap by \$0.6 million and the NPV gap by \$10.2 million from the base case results.

V. WATER PURCHASE AGREEMENT RATE RECOVERY PROCESS & DEBT EQUIVALENCE

Q11. Do you agree with MPWMD General Manager, David Stoldt’s position that the GWR contract does not trigger debt equivalence?

A11. No. I believe that the risk has been reduced based on the provisions in the WPA. However, ORA has requested changes be made to the WPA that were not clearly specified in their rebuttal testimony. If the WPA is changed by the Commission now or in the future, the issue of debt equivalence may become an issue. Also, our assessment is based on the credit rating guidelines provided by the rating agencies today. The rating agency may change that view. As discussed in the testimony of Mr. Richard Svindland, California American Water will need the water produced to meet its legal obligations.

1 Q12. Does this conclude your rebuttal testimony?

2 A12. Yes it does.

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ATTACHMENT 4A

**REBUTTAL TESTIMONY OF JEFFREY T. LINAM
CALIFORNIA AMERICAN WATER
MONTEREY PENINSULA WATER SUPPLY PROJECT
(A.12-04-019)**

MARCH 22, 2016

**Monterey Peninsula Desal Project
Scenario Impact to NPV**

**Year 1
Revenue Requirement**

| | 6.4 MGD + GWR | 9.6 MGD | Difference |
|--|------------------|--------------|-------------|
| Baseline Scenario NPV (\$M) | 713.6 | 687.3 | 26.3 |
| NPV Impact to Baseline Scenario (\$M) | | | |
| Power Inflation Rate (3% baseline) | | | |
| 2% | (19.2) | (21.5) | 2.3 |
| 4% | 23.0 | 26.1 | (3.0) |
| 6% | 84.9 | 96.2 | (11.3) |
| GWR SFR Interest Rate (1% baseline) | | | |
| 0.5% | (2.6) | 0.0 | (2.6) |
| 1.5% | 2.8 | 0.0 | 2.8 |
| 2.0% | 5.7 | 0.0 | 5.7 |
| Grants Received for GWR (\$0 Baseline) | | | |
| \$5.0 | (2.9) | 0.0 | (2.9) |
| \$10.0 | (5.9) | 0.0 | (5.9) |
| \$17.5 | (10.4) | 0.0 | (10.4) |
| \$20.0 | (11.9) | 0.0 | (11.9) |
| MCWD/MCWRA Contribution (\$4.5M baseline) | | | |
| \$0.0 | 2.7 | 0.0 | 2.7 |
| \$15.0 | (6.2) | 0.0 | (6.2) |
| \$25.0 | (12.1) | 0.0 | (12.1) |
| GWR Amount to Finance (\$66.2M baseline) | | | |
| -\$10.0 | (5.9) | 0.0 | (5.9) |
| +\$10.0 | 6.0 | 0.0 | 6.0 |
| +\$20M | 12.0 | 0.0 | 12.0 |
| +\$30M | 17.9 | 0.0 | 17.9 |
| Cost per Acre Foot (\$1,811 baseline) | | | |
| -10% (\$1,600) | (12.2) | 0.0 | (12.2) |
| +10% (\$2,000) | 12.4 | 0.0 | 12.4 |
| +25% (\$2,200) | 30.8 | 0.0 | 30.8 |
| +50% (\$2,700) | 61.5 | 0.0 | 61.5 |
| Discount Rate (5% baseline) | | | |
| 7.5% | (169.7) | (164.9) | (4.8) |
| 9.0% | (242.3) | (235.2) | (7.1) |
| 11.5% | (331.9) | (321.8) | (10.1) |
| Include Outfall? ("Yes" baseline) | | | |
| No | (14.1) | (14.6) | 0.5 |

| 6.4 MGD + GWR | 9.6 MGD |
|------------------|---------|
| 43.6 | 41.3 |
| | |
| | |
| 43.4 | 41.1 |
| 43.8 | 41.6 |
| 44.2 | 42.1 |
| | |
| 43.4 | 41.3 |
| 43.8 | 41.3 |
| 43.9 | 41.3 |
| | |
| 43.4 | 41.3 |
| 43.2 | 41.3 |
| 42.9 | 41.3 |
| 42.8 | 41.3 |
| | |
| 43.8 | 41.3 |
| 43.2 | 41.3 |
| 42.8 | 41.3 |
| | |
| 43.2 | 41.3 |
| 44.0 | 41.3 |
| 44.4 | 41.3 |
| 44.7 | 41.3 |
| | |
| 42.9 | 41.3 |
| 44.2 | 41.3 |
| 45.2 | 41.3 |
| 46.7 | 41.3 |
| | |
| | |
| | |

Notes: Positive numbers increase the NPV, which is more expensive for the customer.
 Baseline NPV is calculated at 5% discount rate, as are other scenario impacts.
 The impact of changes to the cost per AF for GWR is not additive with other changes.

Rate Assumptions 1-14 remain the same from the January 22, 2016 Attachment 4.

ATTACHMENT 5A

**REBUTTAL TESTIMONY OF JEFFREY T. LINAM
CALIFORNIA AMERICAN WATER
MONTEREY PENINSULA WATER SUPPLY PROJECT
(A.12-04-019)**

MARCH 22, 2016

| Project NPV | 6.4 MGD + GWR | 9.6 MGD | Difference |
|----------------------------------|--------------------------|----------------|-------------------|
| Base Case | 713.6 | 687.3 | (26.3) |
| Increased Capex & Opex | 5.1 | 15.3 | 10.2 |
| Total with Lower Salinity | 718.7 | 702.6 | (16.2) |

| Year 1 Cost to the Customer | 6.4 MGD + GWR | 9.6 MGD | Difference |
|------------------------------------|--------------------------|----------------|-------------------|
| Base Case | 43.6 | 41.3 | (2.3) |
| Increased Capex & Opex | 0.4 | 1.0 | 0.6 |
| Total with Lower Salinity | 44.0 | 42.3 | (1.7) |

Note - project NPV used a discount rate of 5.0%

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CALIFORNIA PUBLIC UTILITIES COMMISSION

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