



San Jose  
Water  
Company

110 West Taylor Street  
San Jose, CA 95110  
Phone 408 279-7900  
Fax 408 279-7934

January 10, 2017

Public Utilities Commission  
of the State of California  
505 Van Ness Avenue  
San Francisco, CA 94102

Advice Letter No. 502

The San Jose Water Company (U-168-W) (SJWC) hereby transmits for filing this advice letter reflecting the new corporate structure after reincorporation under SJW Group, Inc. and demonstrating how the utility will continue to comply with the Affiliate Transaction Rules.

In Decision (D.) 16-05-037 the California Public Utilities Commission (Commission) granted SJWC authority to complete the reincorporation of SJW Corp. as SJW Group, Inc. On November 15, 2016, a certificate of merger was filed in the State of Delaware that merged SJW Corp. with and into SJW Group, Inc. under the name SJW Group, Inc., a corporation organized and existing under the laws of the state of Delaware. A certificate of amendment was simultaneously filed to change the name from SJW Group, Inc. to SJW Group.

Ordering Paragraph 4 of the D.16-05-037 states:

*“4. Within 60 days of consummation of the reincorporation transaction and merger, San Jose Water Company must file with the Commission’s Division of Water and Audits a Tier 2 advice letter reflecting the new corporate structure and demonstrating how the utility will continue to comply with the Affiliate Transaction Rules.”*

This advice letter is filed to meet the requirements of this Ordering Paragraph. This advice letter is designated Tier 2 in compliance with D.16-05-037.

#### New Corporate Structure

Since, in effect, only the name of the parent company is changing from SJW Corp. to SJW Group the corporate structure is unchanged. The current corporate structure with SJW Group as the parent is provided as **Attachment A**.

#### Affiliate Transaction Rules Compliance

In D.11-10-034 the Commission adopted Rules for Water and Sewer Utilities Regarding Affiliate Transactions and the Use of Regulated Assets for Non-Tariffed Utility Services (Affiliate Rules). SJWC maintains Affiliated Transactions Procedures to maintain compliance with the Affiliate Transaction Rules. Since the reincorporation involves only a change to the

name and state of incorporation of the parent company SJWC intends to maintain existing practices and procedures to ensure compliance with the Affiliate Transaction Rules. To that end, SJWC has revised the company's Affiliated Transactions Procedures to list SJW Group as the parent company as shown in Attachment B.

### **Effective Date**

The revised San Jose Water Company Affiliate Transactions Procedures were made effective with the date of reincorporation of November 15, 2016.

### **Protests and Responses**

Anyone may respond to or protest this advice letter. A response does not oppose the filing but presents information that may prove 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 may include the following:

- (1) The utility did not properly serve or give notice of the advice letter;
- (2) The relief requested in the advice letter 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 advice letter contain material error or omissions;
- (4) The relief requested in the advice letter is pending before the Commission in a formal proceeding;
- (5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
- (6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory (provided that such a protest may not be made where it would require relitigating a prior order of the Commission).

A response or protest must be made in writing or by electronic mail and must be received by the Water Division within 20 days of the date this advice letter is filed. When submitting a response or protest please include the utility name and advice letter number in the subject line. The address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3<sup>rd</sup> floor  
California Public Utilities Commission,  
505 Van Ness Avenue  
San Francisco, CA 94102  
water\_division@cpuc.ca.gov

On the same date the response or protest is submitted to the Water Division, the respondent or protestant shall send a copy of the protest by mail to us, addressed to:

Regulatory Affairs  
San Jose Water Company  
110 West Taylor Street  
San Jose, California 95196  
Fax 408.279.7934  
regulatoryaffairs@sjwater.com.

The advice letter process does not provide for any responses, protests or comments, except for the utility's reply, after the 20-day comment period.

In compliance with Paragraph 4.3 of General Order 96-B, a copy of this advice letter has been mailed to all interested and affected parties as detailed in **Attachment C**.

SJWC currently has Advice Letter 501 outstanding before the Commission.

This filing will not cause the withdrawal of service, nor conflict with other schedules or rules.

Very truly yours,

/S/ ANN LINDAHL  
ANN LINDAHL  
Supervisor  
Regulatory Affairs

Enclosures

A copy of Advice Letter No. 502 has been sent to the following municipalities, water companies and interested parties:

City of San Jose  
Municipal Water Dept.  
Attn: Mansour Nasser  
3025 Tuers Road  
San Jose, CA 95121

San Jose Mercury News  
Attn: Paul Rogers  
4 N. Second Street, Suite 800  
San Jose, CA 95113

California Water Service Co.  
Attn: Regulatory Affairs  
1720 North First Street  
San Jose, CA 95112

Town of Los Gatos  
Attn: Director of Public Works  
110 E. Main Street  
Los Gatos, CA 95032

City of Cupertino  
10300 Torre Avenue  
Cupertino, CA 95014

City of Monte Sereno  
Attn: Director of Public Works  
18014 Saratoga-Los Gatos Road  
Monte Sereno, CA 95030

City of Campbell  
70 North First Street  
Campbell, CA 95008

City of Saratoga  
Attn: Director of Public Works  
13777 Fruitvale Avenue  
Saratoga, CA 95070

City of Santa Clara  
1500 Warburton Avenue  
Santa Clara, CA 95050

County of Santa Clara  
70 W. Hedding Street  
San Jose, CA 95110

Great Oaks Water Company  
P.O. Box 23490  
San Jose, CA 95153

Department of Water Resources  
Safe Drinking Water Office,  
Room 804  
1416 9<sup>TH</sup> Street  
Sacramento, CA 95814

City of Milpitas  
Attn: Utilities Engineering  
455 East Calaveras Blvd.  
Milpitas, CA 95035

Santa Clara Valley Water  
District  
5750 Almaden Expressway  
San Jose, CA 95118

James M. Fiedler P.E., D.WRE  
Chief Operating Officer  
Water Utility Enterprises  
Santa Clara Valley Water District  
5750 Almaden Expressway  
San Jose, CA 95118

Gillette Mutual Water Company  
21976 Gillette Drive  
Los Gatos, CA 95033

Stagecoach Mutual Water Co  
21825 Stagecoach Road  
Los Gatos, CA 95033

Bob Burke  
Regulatory Liaison For The Six  
Mutual Water Companies  
420 Alberto Way, Unit 49  
Los Gatos, Ca 95032

Summit Mutual Water Co  
P.O. Box 3416  
Saratoga, CA 95070

Mountain Springs Mutual Water Co.  
17956 Greenwood Road  
Los Gatos, CA 95033

Brush & Old Well Mutual  
Water Company  
21105 Brush Road  
Los Gatos, CA 95033

Raineri Mutual Water Company  
P.O. Box 11  
Los Gatos, CA 95031

Oakmount Mutual Water Company  
P.O. Box 31536  
Stockton, CA 95213

James Hunter  
6475 Dwyer Street  
San Jose, CA 95120

Summitt West Mutual Water Company  
P.O. Box 974  
Los Gatos, CA 95031

Saratoga Heights Mutual Water Company  
P.O. Box 337  
Saratoga, CA 95071

Ridge Mutual Water Company  
22316 Citation Drive  
Los Gatos, CA 95033

Villa Del Monte Mutual Water Company  
P.O. Box 862  
Los Gatos, CA 95031

Big Redwood Park Water  
& Improvement Assoc.  
18522 Mt. View Avenue  
Los Gatos, CA 95033

Redwood Estates Services Association  
PO Box 591  
Redwood Estates, CA 95044-0591