

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

In the Matter of the Application of  
California-American Water Company  
(U210W) for an Order Authorizing and  
Imposing a Moratorium on Water Service  
Connections in the Laguna Seca Subarea  
of its Monterey County District.

Application No. A1907005  
(Filed July 2, 2019)

**MOTION FOR PARTY STATUS OF JOSEPH P. LUCIDO**

**RATEPAYER CALIFORNIA AMERICAN WATER COMPANY  
HIDDEN HILLS/BAY RIDGE  
WATER DISTRIBUTION SYSTEM**

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October 30, 2019

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**I. Introduction**

In accordance with Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Joseph P. Lucido (“Lucido”), a ratepayer in California American Water Company’s Hidden Hills/Bay Ridge Water Distribution System, respectfully moves for party status in this proceeding.

**II. Lucido Should be Granted Party Status**

Lucido is a California American Water Company (“Cal Am”) ratepayer in the Hidden Hills/Bay Ridge area whose water service is provided through the Cal Am’s Hidden Hills/Bay Ridge water distribution system, and whose property, and that of his surrounding neighbors, is included within Cal Am’s requested Moratorium on Water Service Connections in the Laguna Seca Subarea and, therefore, subject to Cal Am’s requested restrictions on water connections or water connection extensions on his property.

Lucido seeks party status and is interested in participating in this proceeding, as Lucido does not believe Cal Am's requested moratorium should apply to the Hidden Hills/Bay Ridge water supply and distribution system, as the Hidden Hills/Bay Ridge water distribution system is a satellite system independent of Cal Am's Monterey Main system and the Ryan Ranch/Bishop systems. The Bay Ridge well is the only source of native water for the Hidden Hills/Bay Ridge water distribution system, and this well is located outside the Seaside Groundwater Basin Adjudication Decision legal boundaries. Nor is there sufficient information to support Cal Am's request for a moratorium on connections within the Hidden Hills/Bay Ridge water distribution system.

Concurrent with filing this Motion for Party Status, Lucido is filing testimony providing further information regarding his interest in this proceeding, his concerns with the requested moratorium, and why the proposed Cal Am proposed moratorium should not apply to the Hidden Hills/Bay Ridge water distribution system.

### **III. Notice**

Service of notices, orders, and other correspondence in this proceeding should be directed to Lucido, through his attorney, at the address set forth below:

Joseph P. Lucido  
c/o Christine G. Kemp, Esq.  
Noland, Hamerly, Etienne & Hoss  
333 Salinas Street | P.O. Box 25120  
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Tel: (831) 424-1414  
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With a copy to:

Joseph P. Lucido  
25417 Boots Road  
Monterey, CA 93940  
E-mail: joseph.lucido@sbcglobal.net

### **IV. Conclusion**

For the reasons stated above, Lucido seeks party status in this proceeding to assure that he, and his fellow ratepayers in Cal Am's Hidden Hills/Bay Ridge water distribution system, are

not subjected to an unsupported moratorium on water system connections and expansions in the Hidden Hills/Bay Ridge area.

Lucido's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding.

Lucido respectfully requests that this Motion for Party Status be granted.

Dated: October 30, 2019

Respectfully submitted,

/s/ Christine G. Kemp

Christine G. Kemp, Esq.  
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**VERIFICATION**

I, Joseph Lucido, declare:

1. I am an individual over eighteen years of age, and make this Verification on behalf of myself.

2. I have read the above document, "Motion for Party Status of Joseph P. Lucido", and know its contents. I am informed and believe, and on that ground allege, that the matters stated in the document are true.

3. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 30, 2019, at MONTEREY, California.

  
\_\_\_\_\_  
Joseph Lucido

**CERTIFICATE OF SERVICE**

I, Charlena A. Nossett, declare as follows:

I am employed in the City of Salinas, County of Monterey, California. I am over the age of eighteen years, and not a party to the within cause; my business address is Noland, Hamerly, Etienne & Hoss, 333 Salinas Street, Salinas, California. On October 30, 2019, I served the within:

**MOTION FOR PARTY STATUS**

on the parties and interested parties in this action by placing a true copy thereof in a sealed envelope, addressed as follows:

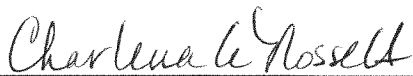
*Please see attached Service List*

(BY MAIL) By placing such envelope, with postage thereon fully prepaid for first class mail, for collection and mailing at Noland, Hamerly, Etienne & Hoss, Gilroy, California following ordinary business practice. I am readily familiar with the practice being that in the ordinary course of business, correspondence is deposited in the United States Postal Service the same day as it is placed for collection.

(BY E-MAIL SERVICE) By transmitting such document electronically from Noland, Hamerly, Etienne & Hoss, Salinas, California, to the electronic mail addresses on the attachment hereto. I am readily familiar with the practice of Noland, Hamerly, Etienne & Hoss for transmitting documents by electronic mail, said practice being that in the ordinary course of business, such electronic mail is transmitted immediately after such document has been tendered for filing. Said practice also complies with Rule 2.3(b) of the Public Utilities Commission of the State of California and all protocols described therein.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on October 30, 2019, at Salinas, California.

  
\_\_\_\_\_  
Charlena A. Nossett

**SERVICE LIST**  
**CPUC Proceeding No. A.19-07-005**  
**Last Changed: September 18, 2019**  
**Mail Addresses**

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**Pending Motion for Party Status:**

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