

1 Robert H. Brumfield, III (State Bar No. 114467)  
2 bob@brumfield-haganlaw.com  
3 BRUMFIELD & HAGAN, LLP  
4 A Limited Liability Partnership  
5 2031 F Street  
6 Bakersfield, CA 93301  
7 Telephone: (661) 215-4980  
8 Facsimile: (661) 215-4989

9 Attorneys for Charles Tapia and the Nellie Tapia Family  
10 Trust

11  
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

14 ANTELOPE VALLEY  
15 GROUNDWATER CASES

16 Included Actions:  
17 Los Angeles County Waterworks District  
18 No. 40 v. Diamond Farming Co., Superior  
19 Court of California, County of Los  
20 Angeles, Case No. BC 325201

Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Kern, Case  
No. S-1500-CV-254348

Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v. City of  
Lancaster, Diamond Farming Co. v.  
Palmdale Water District, Superior Court of  
California, County of Riverside, Case Nos.  
RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV-049053

**DECLARATION OF RICK KOCH IN LIEU  
OF TESTIMONY**

21  
22 I, RICK KOCH, declare as follows:

23 1. I am a Technical Specialist 3 in the Hydraulic Services Department of Southern  
24 California Edison (“SCE”). I make this declaration of my own personal knowledge, and if called  
25 as a witness herein, I could and would competently testify to the matters set forth herein.

26 2. Through my employment with SCE, I am thoroughly familiar with the preparation  
27 and interpretation of business records of SCE, including Hydraulic Test Results. A true and  
28 correct copy of the Hydraulic Test Results for the well pump connected to Meter V349N-14077 on

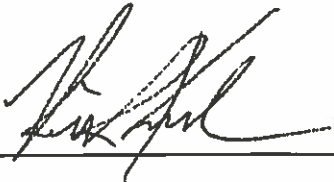
1 February 12, 2013 is attached hereto as Exhibit "A." I personally performed the test reflected in  
2 Exhibit "A."

3 3. I am also thoroughly familiar with the preparation and interpretation of SCE  
4 billing history. A true and correct copy of the billing history for Charles Tapia is attached hereto  
5 as Exhibit "B." Exhibit "B" reflects, among other information, the kilowatt-hours used by Meter  
6 V349N-14077.

7 4. Exhibits "A" and "B" were prepared in the ordinary course of business by SCE  
8 personnel. The records are true and correct copies of original business records maintained by  
9 SCE. I either prepared these records myself or another employee prepared the records following  
10 the same or similar procedure as I would have followed. SCE created the attached records at the  
11 request of its business customer in the ordinary course of SCE's business.

12 5. The pump referenced in Exhibit "A" draws its power from Meter V349N-14077.  
13 Exhibit "B" reflects the billing history for Meter V349N-14077.

14 I declare under penalty of perjury under the laws of the State of California that the  
15 foregoing is true and correct. Executed this 7<sup>th</sup> day of October, 2015, at  
16 Lancaster, California.

17  
18   
19 \_\_\_\_\_  
RICK KOCH

20  
21  
22  
23  
24  
25  
26  
27  
28

**Ex. A**



Confidential/Proprietary Information

February 20, 2013

CHARLES TAPIA  
21083 PLACERITA CYN  
NEWHALL, CA 91321

HYDRAULIC TEST RESULTS, Plant: WELL  
Location: 8425 W AVENUE A HP: 200.0  
Cust #: 0-013-3928 Serv. Acct. #: 000-9676-96  
Meter: V349N-14077 Pump Ref. #: 25314

In accordance with your request, an energy efficiency test was performed on your turbine well pump on February 12, 2013. If you have any questions regarding the results which follow, please contact RICK KOCH at (805)654-7312.

| Results                      | Equipment       |              |                                     |
|------------------------------|-----------------|--------------|-------------------------------------|
|                              | Pump:<br>Motor: | SIMFLO<br>US | No: 111206<br>No: 0173393330002R000 |
|                              | Test 1          | Test 2       | Test 3                              |
| Discharge Pressure, PSI      | 5.4             | 45.8         | 76.0                                |
| Standing Water Level, Feet   | 211.8           | 211.8        | 211.8                               |
| Drawdown, Feet               | 27.8            | 24.8         | 22.4                                |
| Discharge Head, Feet         | 12.5            | 105.1        | 175.6                               |
| Pumping Water Level, Feet    | 239.4           | 236.6        | 234.2                               |
| Total Head, Feet             | 251.9           | 341.7        | 409.8                               |
| Capacity, GPM                | 2,127           | 1,858        | 1,671                               |
| GPM per Foot Drawdown        | 77.1            | 74.9         | 74.6                                |
| Acre Feet Pumped in 24 Hours | 9.401           | 6.212        | 7.386                               |
| kW Input to Motor            | 205.3           | 198.7        | 193.6                               |
| HP Input to Motor            | 275.3           | 266.5        | 259.6                               |
| Motor Load (%)               | 131.9           | 127.6        | 124.4                               |
| Measured Speed of Pump, RPM  | 1,782           |              |                                     |
| kWh per Acre Foot            | 524             | 581          | 629                                 |
| Overall Plant Efficiency (%) | 49.1            | 60.2         | 66.6                                |

The above test results indicate various operating conditions of this pump. Test #1 was performed with the pump free boarding. Test #2 represents the normal operating point.

RUSS JOHNSON  
Manager  
Hydraulic Services

**Ex. B**

**Tapia Bros**  
**SCE Billing History**  
**S/A #000-9676-96**

| Cust Name      | Cust Num | Serv Acct Num | Current Rate | Meter Num    | Service Street Addr | City Name | Zip   | Billing Month | Strat Rate | Bill Amt    | Kwh Usage | Maximum kW | Billing Days |
|----------------|----------|---------------|--------------|--------------|---------------------|-----------|-------|---------------|------------|-------------|-----------|------------|--------------|
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jun 2009      | PA-2       | \$3,284.21  | 26,560    | 94         | 28           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jul 2009      | PA-2       | \$5,264.97  | 50,000    | 92         | 31           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Aug 2009      | PA-2       | \$8,474.60  | 74,080    | 208        | 31           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Sep 2009      | PA-2       | \$6,303.03  | 39,520    | 282        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Oct 2009      | PA-2       | \$5,515.69  | 41,520    | 282        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Nov 2009      | TOU-PA-B   | \$2,847.30  | 33,130    | 89         | 31           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Dec 2009      | TOU-PA-B   | \$1,883.25  | 18,450    | 85         | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jan 2010      | TOU-PA-B   | \$322.04    | 2,356     | 11         | 33           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Feb 2010      | TOU-PA-B   | \$287.89    | 1,905     | 10         | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Mar 2010      | TOU-PA-B   | \$278.10    | 1,656     | 6          | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Apr 2010      | TOU-PA-B   | \$2,708.11  | 15,268    | 205        | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | May 2010      | TOU-PA-B   | \$2,483.70  | 11,035    | 203        | 31           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jun 2010      | TOU-PA-B   | \$5,326.59  | 22,257    | 205        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jul 2010      | TOU-PA-B   | \$7,816.41  | 46,594    | 205        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Aug 2010      | TOU-PA-B   | \$9,951.89  | 73,562    | 205        | 31           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Sep 2010      | TOU-PA-B   | \$8,132.44  | 50,357    | 203        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Oct 2010      | TOU-PA-B   | \$3,102.60  | 6,601     | 202        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Nov 2010      | TOU-PA-B   | \$237.57    | 958       | 7          | 31           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Dec 2010      | TOU-PA-B   | \$256.77    | 1,017     | 9          | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jan 2011      | TOU-PA-B   | \$274.14    | 1,566     | 7          | 33           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Feb 2011      | TOU-PA-B   | \$232.11    | 842       | 7          | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Mar 2011      | TOU-PA-B   | \$232.62    | 839       | 7          | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Apr 2011      | TOU-PA-B   | \$228.54    | 777       | 7          | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | May 2011      | TOU-PA-B   | \$2,977.41  | 18,255    | 203        | 31           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jun 2011      | TOU-PA-B   | \$5,127.01  | 28,724    | 202        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jul 2011      | TOU-PA-B   | \$6,901.56  | 44,446    | 205        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Aug 2011      | TOU-PA-B   | \$8,375.18  | 63,391    | 202        | 31           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Sep 2011      | TOU-PA-B   | \$8,341.34  | 44,002    | 274        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Oct 2011      | TOU-PA-B   | \$6,695.53  | 55,480    | 282        | 33           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Nov 2011      | TOU-PA-B   | \$2,560.99  | 29,586    | 93         | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Dec 2011      | TOU-PA-B   | \$1,564.97  | 12,701    | 90         | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jan 2012      | TOU-PA-B   | \$221.16    | 795       | 7          | 33           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Feb 2012      | TOU-PA-B   | \$3,156.28  | 27,128    | 206        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Mar 2012      | TOU-PA-B   | \$216.40    | 714       | 7          | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Apr 2012      | TOU-PA-B   | \$2,498.13  | 12,432    | 206        | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | May 2012      | TOU-PA-B   | \$5,076.32  | 33,408    | 201        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jun 2012      | TOU-PA-B   | \$8,146.73  | 62,811    | 201        | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jul 2012      | TOU-PA-B   | \$8,491.94  | 65,782    | 201        | 32           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Aug 2012      | TOU-PA-B   | \$6,582.01  | 40,736    | 201        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Sep 2012      | TOU-PA-B   | \$3,915.28  | 38,811    | 189        | 33           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Oct 2012      | TOU-PA-B   | \$2,408.36  | 29,464    | 91         | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Nov 2012      | TOU-PA-B   | \$1,280.40  | 7,717     | 89         | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Dec 2012      | TOU-PA-B   | \$220.41    | 718       | 7          | 33           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jan 2013      | TOU-PA-B   | \$2,019.68  | 925       | 204        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Feb 2013      | TOU-PA-B   | \$3,161.40  | 21,716    | 202        | 31           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Mar 2013      | TOU-PA-B   | \$237.46    | 680       | 7          | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Apr 2013      | TOU-PA3B   | \$2,579.86  | 6,765     | 204        | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | May 2013      | TOU-PA3B   | \$6,625.04  | 41,046    | 204        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jun 2013      | TOU-PA3B   | \$9,822.99  | 57,689    | 203        | 32           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jul 2013      | TOU-PA3B   | \$9,884.48  | 68,786    | 201        | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Aug 2013      | TOU-PA3B   | \$8,635.38  | 54,827    | 202        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Sep 2013      | TOU-PA3B   | \$5,636.55  | 35,323    | 276        | 32           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Oct 2013      | TOU-PA3B   | \$2,633.00  | 28,122    | 89         | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Nov 2013      | TOU-PA3B   | \$1,769.84  | 12,319    | 87         | 33           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Dec 2013      | TOU-PA3B   | \$291.81    | 632       | 6          | 32           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jan 2014      | TOU-PA3B   | \$299.03    | 590       | 6          | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Feb 2014      | TOU-PA3B   | \$298.14    | 555       | 7          | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Mar 2014      | TOU-PA3B   | \$3,358.93  | 19,132    | 203        | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Apr 2014      | TOU-PA3B   | \$7,652.38  | 37,866    | 202        | 32           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | May 2014      | TOU-PA3B   | \$9,935.50  | 53,430    | 203        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jun 2014      | TOU-PA3B   | \$13,525.41 | 67,965    | 274        | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jul 2014      | TOU-PA3B   | \$16,296.01 | 100,434   | 286        | 32           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Aug 2014      | TOU-PA3B   | \$1,674.01  | 47,739    | 276        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Sep 2014      | TOU-PA3B   | \$2,192.29  | 15,446    | 89         | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Oct 2014      | TOU-PA3B   | \$266.28    | 700       | 2          | 32           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Nov 2014      | TOU-PA3B   | \$302.54    | 696       | 6          | 31           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Dec 2014      | TOU-PA3B   | \$313.27    | 710       | 7          | 32           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Jan 2015      | TOU-PA3B   | \$308.75    | 653       | 7          | 29           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Feb 2015      | TOU-PA3B   | \$1,705.25  | 171       | 171        | 30           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Mar 2015      | TOU-PA3B   | \$4,255.62  | 28,427    | 202        | 32           |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425 W AVENUE A     | ROSAMOND  | 93560 | Apr 2015      | TOU-PA3B   |             |           |            |              |
| TAPIA BROS INC | 133928   | 967696        | TOU-PA3B     | V349N-014077 | 8425                |           |       |               |            |             |           |            |              |