


1 Cross-Defendant SOUTHERN CALIFORNIA EDISON COMPANY ("SCE"), in
2 compliance with the Court's Order dated November 16, 2011, respectfully submits the following
3 statement of its water right claim:

- 4 1. The amount of water claimed: 14 acre feet per year.
- 5 2. The amount of pumping: The well on the property is pumping approximately 14 acre feet
6 per year. SCE has pumped from the well on the property since at least 1997, and possibly
7 prior to 1997, but to date, SCE has been unable to locate any records prior to 1997 and
8 precise information regarding the amount of water pumped is not available prior to 2010.
9 Although quantifying amounts pumped prior to 2010 would be difficult, SCE estimates
10 that it has historically pumped at least 14 acre feet per year since at least 1997 for regular
11 maintenance cleaning of SCE's insulators in its Antelope Substation.
- 12 3. The location and source of such pumping is in the Kern County portion of the Antelope
13 Valley, specifically in SCE's Antelope Substation located at 9634 W. Avenue 'J',
14 Lancaster CA 93534.
- 15 4. The bases of the computation of claimed pumping are SCE's available meter records.
- 16 5. The time frame for the pumping from which SCE's calculation is derived is from the last
17 water year (July 2010 -- June 2011). However, the maintenance activities requiring the
18 water use have occurred regularly and consistently since at least 1997. Therefore, the
19 records for the last water year are likely representative of the annual amount of pumping
20 for the time period from 1997 to the present.

21
22 DATED: December 6, 2011

Respectfully submitted,

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24 By:


25 AMY M. GANTVOORT
26 Attorneys for Cross-Defendant
27 SOUTHERN CALIFORNIA EDISON
28 COMPANY

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county aforesaid; I am over the age of 18 years and not a party to the within action; my business address is 2244 Walnut Grove Avenue, Rosemead, California 91770. On December 6, 2011, I served the documents listed below on the parties in this action as follows:

DOCUMENT(S) SERVED: SOUTHERN CALIFORNIA EDISON COMPANY'S STATEMENT OF CLAIM OF WATER RIGHT IN RESPONSE TO COURT'S NOVEMBER 16, 2011 ORDER

- BY SANTA CLARA SUPERIOR COURT E-FILING IN COMPLEX LITIGATION PURSUANT TO CLARIFICATION ORDER DATED OCTOBER 27, 2005
- (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 6, 2011, at Rosemead, California.



AMY M. GANTVOORT