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Attorneys for Cross-Defendant/Cross-Complainant,
ANTELOPE VALLEY UNITED MUTUAL GROUP; and
Cross-Defendants, ADAMS BENNETT INVESTMENTS,
LLC; MIRACLE IMPROVEMENT CORPORATION dba
GOLDEN SANDS MOBILE HOME PARK, aka
GOLDEN SANDS TRAILER PARK, named as ROE
1121; ST. ANDREW'S ABBEY, INC., named as ROE
623; SERVICE ROCK PRODUCTS, L.P.; and SHEEP
CREEK WATER COMPANY, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

Coordination Proceeding
Special Title (Rule 1550(b))

) Judicial Council Coordination
) Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER
CASES**

) Santa Clara Case No. 1-05-CV-049053
) Assigned to the Honorable Jack Komar
) Department 17C

Including Consolidated Actions:

**Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.**
Superior Court of California, County of Los
Angeles, Case No. BC 325 201

) **CROSS-DEFENDANT/CROSS-
COMPLAINANT, ANTELOPE VALLEY
UNITED MUTUAL GROUP,
SPECIFICALLY ANTELOPE PARK
MUTUAL WATER COMPANY'S,
SECOND SUPPLEMENTAL RESPONSE
TO DECEMBER 12, 2012 DISCOVERY
ORDER FOR PHASE 4 TRIAL**

**Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.**
Superior Court of California, County of Kern,
Case No. S-1500-CV-254-348

**Wm. Bolthouse Farms, Inc. v. City of
Lancaster**
Diamond Farming Co. v. City of Lancaster
**Diamond Farming Co. v. Palmdale Water
Dist.**

) For Court's Use Only:
) Santa Clara County
) Case No. 1-05-CV-049053
) (For E-Posting/E-Service Purposes Only)

Superior Court of California, County of
Riverside, consolidated actions, Case Nos. RIC
353 840, RIC 344 436, RIC 344 668

AND RELATED ACTIONS.

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 Cross-Defendant / Cross-Complainant, **ANTELOPE VALLEY UNITED MUTUAL**
3 **GROUP** [comprised of Antelope Park Mutual Water Co., Aqua-J Mutual Water Co., Averydale
4 Mutual Water Co., Baxter Mutual Water Co., Bleich Flat Mutual Water Co., Colorado Mutual
5 Water Co., Eldorado Mutual Water Co., Evergreen Mutual Water Co., Land Projects Mutual
6 Water Co., Landale Mutual Water Co., Shadow Acres Mutual Water Co., Sundale Mutual Water
7 Co., Sunnyside Farms Mutual Water Co., Tierra Bonita Mutual Water Co., Westside Park
8 Mutual Water Co., and White Fence Farms Mutual Water Co., Inc.], by and through their
9 attorneys of record, Gresham Savage Nolan & Tilden, PC, by Michael Duane Davis, Marlene L.
10 Allen-Hammarlund and Derek R. Hoffman, submit the following supplemental information and
11 materials for **ANTELOPE PARK MUTUAL WATER COMPANY**, under penalty of perjury,
12 in response to the December 12, 2012 Discovery Order for Phase 4 Trial (the "*Discovery*
13 *Order*"), issued by the Honorable Jack Komar, Trial Judge.

14 Cross-Defendant / Cross-Complainant, **ANTELOPE VALLEY UNITED MUTUAL**
15 **GROUP**, and specifically **ANTELOPE PARK MUTUAL WATER COMPANY**, made a
16 good faith effort to fully and accurately respond to the categories of information required by the
17 *Discovery Order* in the Discovery Responses that it filed on December 21, 2012. However, due
18 to the shortness of time between the issuance of the order and the degree of detail required by the
19 *Discovery Order*, Cross-Defendant / Cross-Complainant, **ANTELOPE VALLEY UNITED**
20 **MUTUAL GROUP** hereby supplements its responses for **ANTELOPE PARK MUTUAL**
21 **WATER COMPANY** to include information and documents responsive to the *Discovery Order*
22 which were obtained after the December 21, 2012 deadline, and reserves the right to further
23 supplement its responses pursuant to the *Code of Civil Procedure* and this Court's December 12,
24 2012 *Case Management Order for Phase Four Trial* and this Court's January 17th *First*
25 *Amendment to Case Management Order for Phase Four Trial*.

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1 Each supplemental response is identified by reference to specific responses and
2 documents provided in the **Antelope Park Mutual Water Company** section of *Cross-*
3 *Defendant/Cross-Complainant, Antelope Valley United Mutual Group's Information and*
4 *Materials Responsive To December 12, 2012 Discovery Order For Phase 4 Trial* (the "Original
5 Responses").

6 These Supplemental Responses are verified by Don Hamilton, whose name and title are
7 set forth in the Verification block at the end of these supplemental Responses. Mr. Hamilton is
8 authorized to make said verification on behalf of the Antelope Park Mutual Water Company.
9 Mr. Hamilton has personal knowledge that the data and the documentation provided by these
10 Supplemental Responses were collected and are maintained by Antelope Park Mutual Water
11 Company's employees, agents and vendors in the ordinary course of Antelope Park Mutual
12 Water Company's business. Mr. Hamilton has obtained (or caused to be obtained) the data and
13 documentation provided by the Supplemental Responses from the business records of Antelope
14 Park Mutual Water Company. Mr. Hamilton has reviewed these Supplemental Responses and
15 believes the data and documentation to be true and correct to the best of his knowledge and
16 belief.

17 This Second Supplemental Response is submitted to correct a math error in the earlier
18 calculations and presents the corrected calculations based on the data previously submitted.
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1 ANTELOPE PARK MUTUAL WATER COMPANY

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3 Original Response I.3.a. *Prima Facie* Groundwater Production Materials is further
4 supplemented to include references to the following additional documents:

- 5 • Antelope Park Mutual Water Company Well Water Extraction for Years 2011 – 2012 by
6 Larry Gorden (May 25, 2013).
7 • Tables with Meter Reading and kWh Usage data from 12/23/2010 through 29-Nov-12.
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1 **Verification by Authorized Individual:**

2 I, Don Hamilton, am the President of the Board of Directors of the Antelope Park Mutual
3 Water Company and have personal knowledge of the facts set forth above.

4 If called to do so, I could and would competently testify to these facts under oath. I
5 declare under penalty of perjury under the laws of the State of California that the foregoing is
6 true and correct.

7 Executed this 27th day of May, 2013 at Lancaster, CA.

8
9 _____ [signature on attached document]

10 **DON HAMILTON**

11 Respectfully submitted,

12 GRESHAM SAVAGE NOLAN & TIDEN, PC

13
14 By: 

15 MICHAEL DUANE DAVIS, ESQ.

16 MARLENE L. ALLEN-HAMMARLUND, ESQ.

17 DEREK R. HOFFMAN, ESQ.

18 Attorneys for CROSS-DEFENDANT / CROSS-
19 COMPLAINANT, ANTELOPE VALLEY UNITED
20 MUTUAL GROUP; and CROSS-DEFENDANTS,
21 ADAMS BENNETT INVESTMENTS, LLC, MIRACLE
22 IMPROVEMENT CORPORATION dba GOLDEN
23 SANDS MOBILE HOME PARK, aka GOLDEN
24 SANDS TRAILER PARK [ROE 1121], ST.
25 ANDREW'S ABBEY, INC. [ROE 623], SERVICE
26 ROCK PRODUCTS, L.P., and SHEEP CREEK WATER
27 COMPANY, INC.

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ANTELOPE PARK MUTUAL WATER COMPANY

Attachment I.3.a.i.

GRESHAM | SAVAGE
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ANTELOPE PARK MUTUAL WATER COMPANY

Well Water Extraction for Years 2011-2012

Prepared by Larry Gorden
May 25, 2013

Well groundwater extraction (water pumped) for the years 2011 and 2012 are required for Antelope Valley Water Adjudication, Phase 4. Antelope Park has two wells which are used alternately to fill storage tanks.

Antelope Park groundwater extraction estimate is based on Edison records of power consumed in KWH (kilowatt hours) and Edison pump efficiency test. The pump efficiency test provides an estimate of pumping rate in KWH/Acre-Ft. Calculations are based on latest Edison pump efficiency tests conducted June 5, 2012.

Three pumps are the source of electricity usage on the Edison meter: (1) well pump #3, (2) well pump #4, and (3) Booster Pump #2 (Booster Pump #1 us for emergency use only). Well pump #3 and Well Pump #4 are used alternately to pump groundwater into a holding tank so the rate of power consumption will be the average of the two pumps.

Well pump #3	653	KWH/Acre-Ft
Well pump #4	554	KWH/Acre-Ft
Well Average	603.5	KWH/Acre-Ft

The Booster pump (aka. pressure pump) pumps water from the holding tank into a pressure tank for distribution to customers. Thus overall power consumption for pumping water will be the well average consumption plus booster pump consumption.

Well Average	603.5	KWH/Acre-Ft
Booster	363	KWH/Acre-Ft
Well Average + Booster	966.5	KWH/Acre-Ft

For any period in which KWH electricity usage is available, water pumped can be computed by

$$\text{Water Pumped in Acre-Ft} = \frac{\text{KWH usage}}{966.5 \frac{\text{KWH}}{\text{Acre-Ft}}}$$

Using Edison yearly electricity usage records with this calculation we get:

Year	KWH in Year	Acre-Ft in Year
2011	236447	245
Jan-Nov 2012	167069	173

*** Note. 2012 water usage is for 11 months only, excluding December 2012.

Notes.

The following problems (challenges) were encountered in computing electricity usage.

- (1) Some Edison bills were missing from those filed with the court. Each bill gave meter reading for current month and for previous month so readings could be filled in unless there were two successive months missing. In that case, electricity usage could be computed for multiple months using months for which there were bills with meter readings. The December KWh usage includes two months of usage, including November which was missing. So in the end, accurate electricity usage was computed for entire years with available Edison bills.
- (2) There were meter "turnovers", similar to an odometer turnover. Meter went to 99,999 and then to 00,000. That was accounted for in the computations.
- (3) Meter was changed March 16, 2012. The old meter gave meter readings from which electricity usage could be computed. The new meter did not give meter readings, only electricity KWh usage. Fortunately all billings were available for months in which the new meter was used.

Edison bills and Edison Pump Efficiency Tests can be found at

http://www.scefiling.org/filingdocs/1024/59512/94307_AntelopexParkxFirstxSupplementalxResponse_Part1.pdf

These are the tables with computations:

	<u>Meter</u>	
	<u>Reading</u>	<u>KWh Usage</u>
12/23/2010	44222	
Jan-11	50338	6116
Feb-11	57465	7127
Mar-11	64608	7143
Apr-11	74435	9827
May-11	89020	14585
Jun-11	4186	15166
Jul-11	25252	21066
Aug-11	47245	21993
Sep-11	67396	20151
Oct-11	2745	35349
Nov-11		bill missing usage added to Dec usage
Dec-11	80699	77954 bill missing
2011		
		236477 KWh
		244.7 Acre Ft.
Jan-12	8975	28276
Feb-12	17494	8519
16-Mar-12	23832	6338
26-Mar-12		2705 New meter, reports KWh usage only, no meter reading
1-May-12		9819
26-May-12		13117
23-Jun-12		16153
27-Jul-12		19091
28-Aug-12		18173
26-Sep-12		17541
27-Oct-12		15756
29-Nov-12		11551
2012		
		167039 KWh
		172.8 Acre Ft.

Reviewed and approved by Donald B. Hamilton Date 5/27/2013
Don Hamilton

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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF RIVERSIDE

Re: *ANTELOPE VALLEY GROUNDWATER CASES*
Los Angeles County Superior Court Judicial Council Coordinated
Proceedings No. 4408; Santa Clara County Superior Court Case No. 1-05-CV-049053

I am employed in the County of Riverside, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 3750 University Avenue, Suite 250, Riverside, CA 92501-3335.

On May 27, 2013, I served the foregoing document(s) described as **CROSS-DEFENDANT/CROSS-COMPLAINANT, ANTELOPE VALLEY UNITED MUTUAL GROUP, SPECIFICALLY ANTELOPE PARK MUTUAL WATER COMPANY'S, SECOND SUPPLEMENTAL RESPONSE TO DECEMBER 12, 2012 DISCOVERY ORDER FOR PHASE 4 TRIAL** on the interested parties in this action in the following manner:

(X) **BY ELECTRONIC SERVICE** – I posted the document(s) listed above to the Santa Clara County Superior Court website, <http://www.scefiling.org>, in the action of the Antelope Valley Groundwater Cases,

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

Executed on May 27, 2013, at Riverside, California.


DINA M. SNIDER