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1 2 3 4 5	LEON BASS, JR., Bar No. 127403 MICHAEL J. BARRETT, Bar No. 207600 ALLAN D. JOHNSON, Bar No. 217346 AMY M. GANTVOORT, Bar No. 227294 2244 Walnut Grove Avenue, 3 rd Floor Rosemead, CA 91770 Telephone: (626) 302-3712 amy.gantvoort@sce.com	
6	Attorneys for Cross-Defendant SOUTHERN CALIFORNIA EDISON COMPANY	
7 8 9	SUPERIOR COURT OF THE	
10	FOR THE COUNTY	OF LOS ANGELES
11	,)
12 13	COORDINATION PROCEEDING SPECIAL TITLE (Rule 1550(b))	Judicial Council Coordination Proceeding No. 4408
14 15	ANTELOPE VALLEY GROUNDWATER CASES	For filing purposes only: Santa Clara County Case No. 1-05-CV- 049053
16	INCLUDED ACTIONS:	Assigned to the Honorable Jack Komar
17 18 19 20	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co., Los Angeles Superior Court Case No. BC325201	O SOUTHERN CALIFORNIA EDISON O COMPANY'S STATEMENT OF O CLAIM OF WATER RIGHT IN O RESPONSE TO COURT'S NOVEMBER O 16, 2011 ORDER
21 22	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co., Kern County Superior Court Case No. S-1500-CV-254-348)))
23 24 25 26 27	Wm. Bolthouse Farms, Inc. v. City of Lancaster, Diamond Farming Co. v. City of Lancaster, Diamond Farming Co. v. Palmdale Water Dist., Riverside County Superior Court Consolidated Actions Case Nos. RIC 353 840, RIC 344 436, RIC 344 668	
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Cross-Defendant SOUTHERN CALIFORNIA EDISON COMPANY ("SCE"), in compliance with the Court's Order dated November 16, 2011, respectfully submits the following statement of its water right claim:

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

DATED: December 6, 2011

Respectfully submitted,

AMY M. GANTVOORT
Attorneys for Cross-Defendant

SOUTHERN CALIFORNIA EDISON

COMPANY

By:

PROOF OF SERVICE 1 2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES 3 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 4 December 6, 2011, I served the documents listed below on the parties in this action as follows: 5 DOCUMENT(S) SERVED: SOUTHERN CALIFORNIA EDISON COMPANY'S 6 STATEMENT OF CLAIM OF WATER RIGHT IN RESPONSE TO COURT'S **NOVEMBER 16, 2011 ORDER** 7 8 \times BY SANTA CLARA SUPERIOR COURT E-FILING IN COMPLEX LITIGATION PURSUANT TO CLARIFICATION ORDER DATED OCTOBER 27, 2005 9 10 X (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct. 11 12 Executed on December 6, 2011, at Rosemead, California. 13 14 AMY M. GANTVOORT 15 16 17 18 19 20 21 22

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