

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 28, 2021

Natalie Wales  
Director of Regulatory Policy & Compliance  
California Water Service Company  
1720 North First St  
San Jose, CA 95112-4598

Dear Ms. Wales,

The Commission has approved California Water Service Company's Advice Letter No. 2407-A, (Supplement to Advice Letter No. 2407), filed on June 24, 2021, regarding COVID Transition Plan.

Enclosed is a copy of the advice letter with an effective date of July 1, 2021 for the utility's files.

Please contact Bradley Leong at [BL4@cpuc.ca.gov](mailto:BL4@cpuc.ca.gov) or 415-703-2307, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant  
Water Division

Enclosures

**CALIFORNIA PUBLIC UTILITIES COMMISSION  
DIVISION OF WATER AND AUDITS**

**Advice Letter Cover Sheet**

California Water Service  
**Utility Name:** Company **Date Mailed to Service List:** 06/24/2021  
All Regulated Areas (including  
**District:** Grand Oaks and Travis)  
**CPUC Utility #:** U-60-W **Protest Deadline (20<sup>th</sup> Day):** 04/21/2021  
**Advice Letter #:** 2407-A **Review Deadline (30<sup>th</sup> Day):** 05/01/2021  
**Tier:**  1  2  3  Compliance **Requested Effective Date:** 07/01/2021  
**Authorization:** Resolution M-4849, OP 5 **Rate Impact:** None  
**Description:** COVID Transition Plan

The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list. Please see the "Response or Protest" section in the advice letter for more information.

**Utility Contact:** Natalie Wales  
**Phone:** 408-367-8566  
**Email:** [Nwales@calwater.com](mailto:Nwales@calwater.com)

**Utility Contact:** Sean Su  
**Phone:** 408-825-1225  
**Email:** [ssu@calwater.com](mailto:ssu@calwater.com)

**DWA Contact:** Tariff Unit  
**Phone:** (415) 703-1133  
**Email:** [Water.Division@cpuc.ca.gov](mailto:Water.Division@cpuc.ca.gov)

**DWA USE ONLY**

DATE

STAFF

COMMENTS

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APPROVED

WITHDRAWN

REJECTED

**Signature:** \_\_\_\_\_

**Comments:** \_\_\_\_\_

**Date:** \_\_\_\_\_

\_\_\_\_\_



**CALIFORNIA WATER SERVICE COMPANY**

1720 NORTH FIRST STREET  
SAN JOSE, CA 95112 • (408) 367-8200 • F (408) 367-8428

June 24, 2021

**Advice Letter No. 2407-A**

To the California Public Utilities Commission:

California Water Service Company (“Cal Water”) respectfully submits this Tier 2 advice letter applicable to all regulated areas (including Grand Oaks and the Travis District) in accordance with Resolution M-4849, Ordering Paragraph 5.

**Consistent with the Commission’s guidelines during the COVID-19 pandemic, this advice letter is only being distributed electronically to the Water Division and the attached service lists.**

**Summary**

The purpose of this filing is to present Cal Water’s transition plan in accordance with Commission Resolution M-4849, an Authorization and Order directing investor-owned utilities (IOUs) to extend emergency customer protections to support California customers through COVID-19 state of emergency, and to file transition plans in anticipation of the expiration of the related emergency customer protections.

As directed by the Water Division, this Supplement to AL 2407 amends Cal Water’s transition plan by providing a timeline of key activities, including a high-level evaluation of the latest customer arrearage data, and removing Cal Water’s previously proposed Arrearage Management Plan (AMP) Program. In addition, information has been updated to reflect current data and circumstances, such as the extensions of the residential shut-off moratorium and the Commission’s emergency customer protections until September 30, 2021.

**Background**

In Decision (D.) 19-07-015, the Commission established a permanent set of minimum emergency disaster customer protection measures that the utilities are mandated to implement in the event of a declared emergency.<sup>1</sup> Pursuant to (Ordering Paragraph (OP) 1, emergency disaster customer relief protections shall apply to utility customers in areas affected by a disaster declared a state of emergency by the Governor of California or the President of the United States. Consistent with D.19-07-015 OP 9, when a disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility services, the utilities must submit a Tier 1 Advice Letter (AL) with the Commission’s Water Division within 15 days of a governor’s state of emergency declaration or a presidential state of emergency proclamation reporting compliance with the Decision’s

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<sup>1</sup> D.19-07-015 at 4.



mandated emergency disaster customer relief protections. On March 4, 2020, Governor Gavin Newsom (Governor) declared a State of Emergency in response to the outbreak of novel coronavirus, COVID-19.<sup>2</sup> On March 13, 2020, President Trump signed an Emergency Declaration to facilitate a federal response to the emerging COVID-19 pandemic.<sup>3</sup>

In response to the March 17, 2020 letter from then Executive Director Stebbins to energy, water and communication corporations to retroactively apply customer protection measures from March 4, 2020 onward during the pendency of the COVID-19 pandemic, for up to one year with an option to extend, Cal Water submitted AL 2379 on March 30, 2020 affirming the company's compliance with specific emergency customer protections and outreach activities in light of the COVID-19 pandemic.

These actions also complied with Executive Order N-42-20 (April 2, 2020) of Governor Newsom, in that Cal Water suspended shut-offs for nonpayment for all customers, and has worked to reconnect customers who had been disconnected for nonpayment since February 27, 2020).

On April 17, 2020, the Commission issued Resolution M-4842, which ratified directions provided by the Commission's Executive Director on March 17, 2020. In response, Cal Water filed AL 2383 to provide a more detailed response to address the seven items listed for water companies in Resolution M-4842, as well as Cal Water's outreach regarding those emergency customer protections.

On February 11, 2021, the Commission adopted Resolution M-4849, Authorization and Order Directing Utilities to Extend Emergency Customer Protections to Support California Customers through June 30, 2021, and to File Transition Plans for the Expiration of the Emergency Customer Protections.<sup>4</sup>

On February 22, 2021, Cal Water filed AL 2403 to demonstrate compliance with emergency customer protections through June 30, 2021. Resolution M-4849 requires the Investor-Owned Utilities (IOUs) to file a transition plan "to facilitate a smooth transition for customers when the Emergency Customer Protections are lifted."<sup>5</sup> The IOUs are directed to "design the transition plan to effectively ease customers through a transition off of the Emergency Customer Protections."<sup>6</sup> The transition plan must include: "1) a timeline of new activities and resumed activities, 2) a marketing, education, and outreach (ME&O) strategy, 3) an explanation of how the activities timeline and ME&O strategy account for compliance and safety, and 4) a progress

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<sup>2</sup> <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

<sup>3</sup> <https://www.federalregister.gov/documents/2020/03/18/2020-05794/declaring-a-national-emergency-concerning-the-novel-coronavirus-disease-covid-19-outbreak>.

<sup>4</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M365/K448/365448995.PDF>

<sup>5</sup> Res. M-4849 at 10.

<sup>6</sup> *Id.*



tracking and reporting plan.”<sup>7</sup> The goal of the transition plan is to proactively enroll customers in programs to manage their utility bills and inform relevant customers of the changes to programs they are already on.”<sup>8</sup> In addition, “IOUs should take into account the challenges and solutions discussed in the October 30 and November 12, 2020 COVID workshops as they prepare their transition plans.”<sup>9</sup>

Resolution M-4849 also calls for consideration of input from the Low Income Oversight Board (LIOB) and Commission staff: “The IOUs shall consider and incorporate LIOB board member input where feasible, and any Commission staff feedback, and submit final advice letters on April 1, 2021.”<sup>10</sup> On March 19, 2021, the LIOB provided recommendations in a letter directed to the Commission. LIOB input has been included in this version of Cal Water’s Resolution M-4849 Transition Plan. The ME&O Strategy was prepared in coordination with other Class A investor-owned water utilities and includes consideration of the input from the LIOB.

On June 11, 2021 the Governor signed Executive Order N-08-21, which continued Executive Order N-42-20 through September 30, 2021.<sup>11</sup> Accordingly, on June 16, 2021 the Commission directed water and sewer utilities to also extend the Emergency Customer Protections and appropriate memorandum accounts through September 30, 2021.

## **Discussion**

Cal Water recognizes the substantial financial hardships that many of its customers have been enduring due to COVID-19 we remain committed to assisting our customers throughout the evolving pandemic and the transition from customer protections. Cal Water strives to transition from the expiration of Emergency Customer protections and the resumption of normal business activities, including disconnections for non-payment, in the most customer focused and efficient way possible.

## **TRANSITION PLAN**

### **A. Activities Timeline**

The following summarizes Cal Water’s timeline of key activities associated with the expiration of emergency protections, as well as its communications with customers regarding bill payment, restoration of service, disconnections, low-income assistance enrollment and recertification, payment arrangement options, and arrearage management plans. These activities are dependent upon the later of either the expiration of Emergency Customer

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<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 34.

<sup>9</sup> *Id.* at 10.

<sup>10</sup> Commission Resolution M-4849 at p. 16.

<sup>11</sup> <https://www.gov.ca.gov/wp-content/uploads/2021/06/6.11.21-EO-N-08-21-signed.pdf>



Protections or the lifting of the Governor's moratorium on disconnections for nonpayment:<sup>12</sup>

- At least 30 days prior to the resumption date, Cal Water will notify customers that the fees for reconnection may resume when the Emergency Customer Protections expire.
- At least 30 days prior to the resumption date, Cal Water will notify CAP/LIRA customers that, to the extent their recertification is overdue, they will have at least 60 days to recertify or may be removed from the program.
- At least 30 days prior to lifting of the moratorium on residential shut-offs for nonpayment, Cal Water will inform customers that the moratorium will be ending.
  - At that time, residential customers with arrearages, as well as all CAP/LIRA customers, will be reminded to stay current on their bills and be informed of assistance programs.
- After the disconnection moratorium is lifted, Cal Water will wait at least 30 days before resuming the normal disconnection procedures contained in its tariffs. (This includes allowing residential customers a total of 79 days to make bill payment prior to disconnection, sending payment reminders by letter and proactive outbound calls, a petition mechanism for utility review and CPUC appeal, residential health and safety exemptions, and tenant notifications in landlord disconnections. Cal Water will also provide information to customers with respect to low-income assistance programs, payment arrangement options, and arrearage management plans.)

## **B. Payment Plans**

Cal Water offers its customers payment arrangements to maintain their utility service and avoid disconnection. During the disconnection moratorium, which remains in effect, Cal Water service representatives have worked closely with customers to structure payment plans to collect arrearages. Options available to customers include splitting payments (payment arrangements) for up to six months to pay off the full balance and deferring payments (payment extensions) of the full balance for up to two weeks beyond the due date. Cal Water intends to continue to offer payment arrangements and payment extensions once the disconnection moratorium is lifted and customer protections expire including offering customers a new, longer 12-month payment plan, and an arrearage management plan.

Customers who remain current on the payment arrangement and current bill will not be

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<sup>12</sup> Recent experience has shown that flexibility will be needed as to the start dates for certain customer communications. For example, customer confusion would have resulted if Cal Water had strictly adhered to its ME&O plan and begun informing customers on June 1, 2021 that normal business practices would resume after the original June 30, 2021 moratorium expiration dates. As discussed in the Background section, the extension of both the shut-off moratorium and the Commission's customer protections to September 30, 2021 were not announced until June 11<sup>th</sup> and June 16<sup>th</sup>, respectively. In those circumstances, it was advantageous that Cal Water held off initiating such communications.



disconnected. Cal Water will not require additional statement of hardship or need for the purpose of qualifying customers for payment arrangements. These provisions will apply to both residential and non-residential customers.

### **C. Late payment charges**

Cal Water does not charge late payment fees.

### **D. Restoration of Service**

In order to resume or continue service that has been disconnected for non-payment, Cal Water intends to resume assessing reconnection fees after the expiration of Emergency Customer Protections. As the disconnection moratorium has been in place since March 2020 and Cal Water has not disconnected customers for non-payment, reconnection fees will resume after the minimum 79-day grace period,<sup>13</sup> as contained in the tariff rules, expires. As such, Cal Water expects to resume assessing reconnection fees at that time.

Customers will be notified of this change 30 days prior to the expiration of the Emergency Customer Protections.

### **E. Low-Income Ratepayer Assistance / Customer Assistance Program Recertification**

Low-Income Ratepayer Assistance (LIRA) or Customer Assistance Program (CAP)<sup>14</sup> customers recertify their eligibility every two years. While the Emergency Customer Protections have been in effect, eligibility recertification has been suspended. When the Emergency Customer Protections expire, Cal Water will ensure that customers have at least 60 days to recertify prior to being removed from the program.

Cal Water notes that data exchanges between itself and the energy companies occurred three times in 2020 to ensure that all eligible customers are enrolled in the CAP program. By ruling issued in R.17-06-024, water and energy utilities were directed to meet and confer regarding CAP data exchanges and report back their recommendations. The water and energy utilities agreed to share data up to and no more than four times a year. Cal Water proposes an additional data exchange with energy utilities in 2021 (to three times this year), and increasing that frequency to quarterly for 2022, assuming cooperation by the energy companies.

Customers will be notified of this change at least 30-days prior to the expiration of the CPUC's

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<sup>13</sup> SB 998, Dodd. Discontinuation of residential water service: urban and community water systems, September 28, 2018, requires that customers be delinquent for at least 60-days prior to disconnection. Incorporating this law into Cal Water's then existing 19-day delinquent policy yields a minimum 79-day period before disconnection.

<sup>14</sup> In D.20-08-047, dated August 27, 2020, the Commission ordered all water utilities to change the name of their low-income assistance programs to "Customer Assistance Program" at the time of filing of their next General Rate Case or GRC. Cal Water currently uses the acronym LIRA for its low-income ratepayer assistance program. Cal Water's next GRC filing is scheduled for July 2021.



Emergency Customer Protections.

#### **F. Resumption of Disconnects for Non-Payment**

In compliance with Governor Newsom's Executive Orders N-42-20 and N-08-21, Cal Water has suspended shut-offs for nonpayment for all customers, and has worked to reconnect customers who had been disconnected for nonpayment since February 27, 2020.

Cal Water remains committed to working with its customers through the transition period as the Emergency Customer Protections expire and normal business activities resume. Cal Water recognizes the on-going impact of COVID-19 on customer's finances and health and the company does not desire to potentially aggravate any customer's situation by disconnecting water service. In this spirit, Cal Water plans to strategically resume the regulated disconnection process once the disconnection moratorium is lifted and the consumer protections expire, whichever date is later

Cal Water's Tariff Rule No. 11, effective February 1, 2020, contains robust pre-disconnection customer protections prescribed by SB 998. Once normal disconnection procedures resume, Cal Water will follow all existing consumer protections including, allowing residential customers<sup>15</sup> a total of 79 days to make bill payment prior to disconnection, sending payment reminders by letter and proactive outbound calls, a petition mechanism for utility review and CPUC appeal, residential health and safety exemptions, as well as tenant notifications in landlord disconnections. Cal Water will also provide information to customers with respect to low-income assistance programs, payment arrangement options, and arrearage management plans.

#### **G. Collections Communication**

Under Cal Water's Transition Plan, Cal Water will issue a notice informing customers of the impending lifting of the disconnection moratorium no less than 30 days beforehand. All residential customers who have arrears at the time of the communication that could subject them to disconnection, including CAP customers, will be mailed or e-mailed this letter, depending on the customer's indicated preference, reminding them of the need to stay current on their bills and providing information on how to contact Cal Water to enroll in available programs, if needed.

After the disconnection moratorium is lifted, to ensure there is adequate time for customers to receive notice and make payment arrangements as necessary, Cal Water will wait an additional 30-days prior to resuming normal business practices for disconnects. Cal Water will then follow its Tariff Rule No. 11 provisions for disconnections, along with the noticing requirements

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<sup>15</sup> Non-residential customers are afforded at least a 10-day notice.





contained in Tariff Rule No. 8, which offers a 79-day period for bill payment / payment arrangement prior to disconnection for residential customers. Both the pre-notice and grace period will allow for a smoother transition for customers as Cal Water resumes normal business practices.

## **H. Marketing, Education, and Outreach Strategy**

Cal Water's Marketing, Education, and Outreach Strategy is designed to support Cal Water's Transition Plan in effectively easing customers through a transition off of the Emergency Customer Protections (and the future expiration of the disconnection moratorium in the Governor's Executive Order N-08-21) by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled. The Strategy was developed with a customer-impact lens and is part of a coordinated and effective marketing, education, and outreach program with other CPUC-regulated water utilities.

### **(1) Audiences**

The ME&O Strategy is intended to reach both customers at large and specifically targeted categories of customers as follows:

- Customers enrolled in bill management programs
- Customers with arrears
- Customers who may qualify for disconnection preventions due to medical needs pursuant to SB998
- Customers on assistance programs

### **(2) ME&O Activities for All Customers (At Large, Across All Class A & B Water Utilities) & Key Messages**

Cal Water will leverage ongoing communication channels to educate and engage customers about:

- Expiration of CPUC Emergency Customer Protections enacted during the COVID-19 crisis
- Ending of State protections (e.g., Shutoffs for Non-Payment (SONP) moratorium - prepared and distributed date SONPs to resume is announced)
- Programs available to help customers maintain service (payment arrangements and payment extensions.)
- Water efficiency and rebate programs that can help customers use less water and, therefore, reduce their water bill
- Information about the extension of customer protections, where necessary

Tools for implementation statewide across all regulated water utilities include:



- Bill inserts
- Customer service talking points and training
- Automated phone message prompt (i.e. during welcome/on-hold messages)
- Office signage (when reopened to the public)

### **(3) Targeted Outreach**

Additionally, Cal Water will undertake specific, proactive outreach to targeted customers as listed above under “audiences.” Tools will include the following:

- Phone calls (automated or manual)
- Emails or direct mail

Targeted outreach will convey the following information, as appropriate:

- Information about pending changes to a customer’s service status (in accordance with SB 998) or program enrollment (CAP) status
- Needed customer actions, including re-certifications, to remain eligible for programs
- Payment plans and options available to help customers maintain service or manage arrearages, to include date SONPs will be reinstated
- Bill assistance programs
- Application of reconnection and other fees to a customer
- Noticing of risk of disconnection (termination letter 25 days prior to shutoff, door hanger 10 days prior shutoff)
- Information about qualifying for disconnection preventions due to medical needs pursuant to SB 998

### **(4) Additional ME&O Activities and Tools by Large Class A Companies**

Additional channels for customer communication and targeted outreach that may be undertaken by larger Class A utilities (including Cal Water), as resources allow, are:

- Company web site
- Social media
- News releases to local media
- Virtual community meeting
- Direct contact at customer residence (i.e. door hangers)
- Materials in multiple languages (according to customer demographics)
- Advertising (print, social media, or other)
- Phone logistics – ensure company name appears on Caller IDs so customers don’t think they’re being scammed



**i) Partnerships**

- **Partnership Activities By Individual Water Utilities** – Cal Water will seek to identify and partner with community-based and other organizations that regularly interact with targeted audiences to expand our outreach program. This includes, as directed in Resolution M-4849, seeking to partner with the California Department of Community Services and Development and their local service providers to leverage their customer interactions for expanding outreach efforts on bill management programs.
- **Industry-wide Partnership Activities** – California Water Association will also assist Cal Water and other water utilities in coordinating the following additional, potential avenues and partnerships:
  - The California Special Districts Association (CSDA) and their local service providers to promote programs offered by local regulated water utilities
  - Cal Water proposes to increase the frequency of data sharing with energy companies to identify potential customers who could benefit from water utility assistance programs (see Section D, above).
  - Services by diverse suppliers to assist Cal Water in implementing customer ME&O activities and tools

**(5) Detailed ME&O Targeted to Low-Income Customers**

Cal Water will undertake the following specific activities designed to reach low-income customers:

- Information about CAP enrollment status and any recertifications needed sent directly to CAP-enrolled customers
- Additional data exchanges with energy utilities to automatically enroll those eligible for LIRA, along with letters to those who may qualify based on partial similar data
- Conservation programs, particularly Cal Water’s new Smart Landscape Tuneup Program that enables outdoor irrigation leaks to be fixed at no cost to the customer, sent directly to CAP-enrolled customers
- Pilot partnership program with CBOs in selected socioeconomically disadvantaged districts to publicize Cal Water assistance programs and track need for information
- Rental and utility bill assistance programs offered by counties and the State sent via multiple channels; below are programs established and being publicized to date

District	Description	Channels	URL
<b>Selma – all residents</b>	Fresno County resident utility aid grant (through March 19)	Social media, email	<a href="http://bit.ly/3eHCKVg">bit.ly/3eHCKVg</a>
<b>Kern River Valley, Bakersfield</b>	Kern County rental assistance program (now	Social media, email, bill	<a href="http://rup.kernha.org">rup.kernha.org</a>



	through end of year or until funds depleted)	onsert April cycle	
<b>Stockton</b>	City of Stockton past-due rent & utilities assistance (now through April 30)	Social media, email	<a href="http://stocktonca.gov/RentHelp">stocktonca.gov/RentHelp</a>
<b>Antelope Valley, Bay Area Region, Bear Gulch, Chico, Dixon, East LA, Livermore, Los Altos, Marysville, Oroville, Visalia, Westlake</b>	Statewide renter assistance program (4/1/2021 – 3/31/2022)	Social media, email, bill onsert April cycle	<a href="http://HousingIsKey.com">HousingIsKey.com</a> (onsert) <a href="https://housing.ca.gov/covid_rr/program_overview.html">https://housing.ca.gov/covid_rr/program_overview.html</a>
<b>Selma</b>	Fresno County rental assistance program	Social media, email	To come
<b>Salinas, King City</b>	Monterey County rental assistance program (until funds run out)	Social media, email	<a href="http://www.unitedwaymcca.org/county-rent-and-utility">www.unitedwaymcca.org/county-rent-and-utility</a>
<b>Livermore</b>	Alameda County (until funds run out)	Social media, email	<a href="http://www.ac-housingsecure.org">www.ac-housingsecure.org</a>
<b>Marysville</b>	Yuba-Sutter Economic Development Corp	Social media, email, bill onsert	To come

**I. Costs**

Cal Water’s ME&O strategy plans to utilize existing outreach and marketing budgets, with additional redirects from conservation program budgets when feasible. Cal Water does not have a separate budget for low-income programs. Should direct mail become required, the additional cost may need to be recovered. Direct mail to all Cal Water customers costs about \$200,000, including postage. Direct mail to a targeted group of customers would cost less; however, emailing where possible will reduce that cost.

To the extent that Cal Water tracks unpaid arrearages in its Catastrophic Event Memorandum Account (CEMA), it is important that consideration be given to keeping the CEMA open for a period after the disconnection moratorium is lifted because ending the moratorium does not mean that the financial harm experienced by customers as a result of the pandemic also ends.

**J. Compliance and Safety**

Cal Water recognizes the substantial financial hardships that many of its customers have been enduring due to COVID-19 and we remain committed to assisting our customers throughout the evolving pandemic and the transition from customer protections. We are committed to keeping and enrolling low-income and newly low-income customers in eligible programs and



will continue increase CARE data exchanges with our energy utility partners to ensure that no customer is left behind.

As a 24-hour-per-day, 7-days-a-week utility, Cal Water is committed to the safety of its employees and customers. Cal Water's goal is to exceed state and local health orders, and the company considers the most stringent of these requirements as a minimum safety floor. To that end, Cal Water has instituted a number of safety measures throughout its field offices including; (1) mass rollout of personal protective equipment (PPE) and temperature screening at all locations, (2) employee 15-days paid COVID-19 leave for direct exposures and childcare needs, (3) work "pandemic pods" to minimize employee interaction across functional areas, and (4) allowing employees to work from home to the maximum extent possible. All employee / customer interactions comply with the safety guidelines of the Centers for Disease Control (CDC), including the wearing of masks by employees, maintaining a 6-foot separation, and minimizing one-to-one interaction time.

Companies are required to estimate the number of customers who may face disconnection when the shut-off moratorium is lifted. Projecting customer behavior during an unprecedented pandemic is highly speculative. Nevertheless, in terms of a high-level evaluation, Cal Water can report that, as of May 31, 2021, about 16,000 residential premises had accounts with arrearages over 150 days old. With about 420,000 residential premises in Cal Water's regulated service area, the number of residential customers with balances over 150 days old who may not be able to pay their bills outright, or through a payment arrangement, could be approximately 3.8% of Cal Water's total residential customers.

#### **K. Progress Tracking and Reporting Plan**

Despite the transition plan activities and assistance programs cited above, there is continuing uncertainty over the magnitude and duration of economic hardship caused by the pandemic. In this situation it would be appropriate for the Commission to continue to monitor the situation after lifting the disconnection moratorium and customer protections by reviewing monthly reports for progress tracking and reporting.

Cal Water plans to track and report on the transition plan activities using existing reporting tools along with new reports as needed, including:

1. Monthly data reports regarding customers arrearages as part of the water low-income rate assistance rulemaking proceeding R.17-06-024
2. Number of newly enrolled customers that are able to stay on the CAP program after the moratorium is lifted (for a period of one year)
3. Number of customers enrolled in alternative payment arrangements
4. Customers disconnects and reconnections, including:
  - a. Number and percentage of disconnections for households enrolled in the CAP program
  - b. Number and percentage of disconnections for households enrolled in the AMP Program and the CAP program



5. To the extent the information is available to Cal Water, number and amount of Housing and Community Development (HCD) payments applied to customers' bills.

### **Requested Effective Date**

As required by Resolution M-4849, this advice letter is being filed as Tier 2 advice letter. Cal Water requests an effective date of **July 1, 2021**.

### **Notice**

Customer Notice – There is no customer notice requirement associated with this advice letter.

Service Lists – In accordance with General Order 96-B, General Rule 4.3 and 7.2 and Water Industry Rule 4.1, a copy of this advice letter will be transmitted **electronically on June 24, 2021** to competing and adjacent utilities and other utilities or interested parties having requested such notification. ***Please note that, consistent with the Commission's guidelines for service during the COVID-19 pandemic, this advice letter is only being distributed electronically.***

### **Response or Protest**

Anyone may respond to or protest this advice letter. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter. A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

- (1) The utility did not properly serve or give notice of the advice letter;
- (2) The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
- (3) The analysis, calculations, or data in the advice letter contain material error or omissions;
- (4) The relief requested in the advice letter is pending before the Commission in a formal proceeding; or
- (5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
- (6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory (provided that such a protest may not be made where it would require relitigating a prior order of the Commission.)

A protest shall provide citations or proofs where available to allow staff to properly consider the protest. A response or protest must be made in writing or by electronic mail and must be received by the Water Division within 20 days of the date this advice letter is filed. The advice letter process does not provide for any responses, protests or comments, except for the utility's reply, after the 20-day comment period. The address for mailing or delivering a protest is:



**CALIFORNIA WATER SERVICE COMPANY**

Advice Letter 2407-A, COVID Transition Plan

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Tariff Unit, Water Division 3<sup>rd</sup> floor  
California Public Utilities Commission,  
505 Van Ness Avenue, San Francisco, CA 94102  
[water\\_division@cpuc.ca.gov](mailto:water_division@cpuc.ca.gov)

On the same date the response or protest is submitted to the Water Division, the respondent or protestant shall send a copy by mail (or e-mail) to us, addressed to:

Natalie Wales  
California Water Service Company  
1720 North First Street,  
San Jose, California 95112  
[cwsrates@calwater.com](mailto:cwsrates@calwater.com)

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division, within the 20-day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

**Replies**

The utility shall reply to each protest and may reply to any response. Each reply must be received by the Water Division within 5 business days after the end of the protest period, and shall be served on the same day to the person who filed the protest or response. If you have not received a reply to your protest within 10 business days, contact California Water Service Company at 408-367-8200.

CALIFORNIA WATER SERVICE COMPANY

A handwritten signature in cursive script that reads "Natalie Wales".

Natalie Wales  
Director of Regulatory Policy and Compliance

cc: Syreeta Gibbs (Public Advocates Office)  
[PublicAdvocatesWater@cpuc.ca.gov](mailto:PublicAdvocatesWater@cpuc.ca.gov)