

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

**Advice Letter Cover Sheet**

**Utility Name:** California Water Service Company  
Chico, Marysville, Oroville, and  
**District:** Westlake  
**CPUC Utility #:** U-60-W  
**Advice Letter #:** 2329  
**Tier:**  1  2  3  Compliance  
**Authorization:**  
**Description:** Wildfire Disaster Relief Compliance Filing  
(Camp and Woolsey Fires)

**Date Mailed to Service List:** 11/26/2018  
**Protest Deadline (20<sup>th</sup> Day):** 12/13/2018  
**Review Deadline (30<sup>th</sup> Day):** 12/26/2018  
**Requested Effective Date:** 11/26/2018  
**Rate Impact:** none

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:** James Polanco  
**Phone:** 408-497-3739  
**Email:** [jpolanco@calwater.com](mailto:jpolanco@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

<u>DATE</u>	<u>STAFF</u>	<u>COMMENTS</u>
_____	_____	_____
_____	_____	_____

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WITHDRAWN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

November 26, 2018

**Advice Letter No. 2329**

To the California Public Utilities Commission:

California Water Service Company (“Cal Water”) respectfully submits this Tier 1 advice letter in compliance with the D.18-08-004, the Decision Affirming the Provisions of Resolutions M-4833 and M-4835 as Interim Disaster Relief Emergency Customer Protections, with regard to the Camp Fire (Chico, Marysville, and Oroville Districts) and Woolsey Fire (Westlake District).

**Summary**

D.18-08-004 requires water and sewer companies to file a Tier 1 advice letter within 15 days after a state of emergency is proclaimed for an event affecting the water or sewer company. The Tier 1 advice letter is intended to affirm to the California Public Utilities Commission that the company is complying with interim “Emergency Customer Protections” adopted in D.18-08-004, pending the adoption of final rules in R.18-03-011.

**Background**

In D.18-08-004, the Commission provided as follows in Ordering Paragraph 4:

4. In the event the Governor of California declares a state of emergency because 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 service, regulated water and sewer utilities shall file a Tier 1 advice letter within 15 days reporting compliance with Resolutions M-4833 and M-4835 pursuant to this Decision and costs of lost revenues may be included in the appropriate Catastrophic Even Memorandum Account.

The Commission also adopted the following Conclusions of Law relevant to Ordering Paragraph 4:

12. The protections in Resolutions M-4833 and M-4835 shall apply to residential and non-residential (small business) water and sewer customers in areas pronounced by the Governor’s Office within the



affected service territory of the water and sewer companies under this Commission's jurisdiction.

13. It is reasonable to require the water and sewer companies under this Commission's jurisdiction to file a Tier 1 advice letter within 15 days of the Governor's state of emergency proclamation with the Commission's Water Division demonstrating compliance with the protections in Resolutions M-4833 and M-4835 stipulating: (a) activation of their CEMA; (b) make insurance claims on all costs and expenses incurred as a result of the fires, and credit insurance payments to their CEMA; (c) work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for nonpayment; (d) waive reconnection or facilities fees for affected customers and suspend deposits for affected customers who must reconnect to the system; (e) provide reasonable payment options to affected customers; and (f) waive bills for victims who lost their homes or small businesses. Costs of lost revenues may be included in the appropriate CEMA account.

### Discussion

A state of emergency proclamation was issued on November 8, 2018 for Butte County due to the effects of the **Camp Fire**,<sup>1</sup> potentially impacting Cal Water's Chico, Marysville, and Oroville Districts. At this time, Cal Water is not aware of any losses to homes or facilities in these districts as a result of the Camp Fire.

A state of emergency proclamation was issued on November 9, 2018 for Los Angeles and Ventura counties due to the effects of the Hill and **Woolsey Fire**,<sup>2</sup> potentially impacting Cal Water's Westlake District. At this time, Cal Water had determined that 19 homes were lost in the Westlake District as a result of the Woolsey Fire. There are also structural losses in the water system as a result of the Woolsey Fire that Cal Water is still evaluating.

In compliance with Ordering Paragraph 4 and Conclusions of Law 12 and 13 of D.18-08-004, Cal Water stipulates as follows:

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<sup>1</sup> <https://www.gov.ca.gov/2018/11/08/acting-governor-newsom-declares-state-of-emergency-in-butte-county-due-to-camp-fire/>.

<sup>2</sup> <https://www.gov.ca.gov/2018/11/09/state-of-emergency-in-los-angeles-and-ventura-counties/>.



1. Activation of the CEMA;
  - Cal Water is evaluating the costs associated with the wildfires, and tracking its costs using product codes. Cal Water will activate the CEMA for these events within the 30-day deadline as appropriate.
2. Make insurance claims on all costs and expenses incurred as a result of the fires, and credit insurance payments to their CEMA;
  - Cal Water has begun making insurance claims as a result of the fires, and will continue to do so as appropriate. Any funds received as a result of such insurance claims will be credited to the CEMA.
3. Work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment;
  - For customers who have lost their homes, as well as for customers who may have difficulty paying their bills due to other aspects of the fires (such as mandatory evacuations), Cal Water will work cooperatively to resolve unpaid bills and minimize disconnections for non-payment.
4. Waive reconnection or facilities fees for affected customers and suspend deposits for affected customers who must reconnect to the system;
  - For customers who have lost their homes, as well as for customers who may have difficulty paying their bills due to other aspects of the fires (such as mandatory evacuations), Cal Water will waive reconnection fees. Cal Water does not require customer deposits.
5. Provide reasonable payment options to affected customers; and
  - Cal Water has various payment options available to customers, and will ensure that those plans are offered and adjusted as needed to take into account the needs of customers affected by the wildfires.
6. Waive bills for victims who lost their homes. Costs of lost revenues may be included in the appropriate CEMA account.
  - For customers who have lost their homes as a result of the wildfires, Cal Water will waive current and past due water bills.

**Requested Effective Date**

This is being filed pursuant to General Order 96-B, Water Industry Rule 7.3.1(3), as modified by Resolution W-4664, is a Tier 1 advice letter. Because it is a compliance filing that does not



require any changes to Cal Water's tariffs, Cal Water does not request a specific effective date.

### **Notice**

Customer Notice – Customer notice of Tier 1 advice letters is not required under General Order 96-B, General Rule 7.3.1.

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 mailed or electronically transmitted on **November 26, 2018**, to competing and adjacent utilities and other utilities or interested parties having requested such notification.

### **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 2329, Wildfire Disaster Relief Compliance Filing

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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  
Fax 408/367-8566 or  
[Nwales@calwater.com](mailto:Nwales@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

/s/

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Natalie Wales  
Director of Regulatory Policy and Compliance

cc: Ting-Pong Yuen, ORA



## Chico District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

ANNA LAROQUE  
**ConService**  
99 East 700 South  
Logan, UT 84321  
alaroque@conservice.com

CHRIS CONSTANTIN, ASSISTANT CITY  
MANAGER  
**City of Chico**  
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FRANK FIELDS  
**City of Chico**  
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MARK ORME, CITY MANAGER  
**City of Chico**  
P.O.Box 3420  
Chico, CA 95927  
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SCOTT DOWELL  
**City of Chico**  
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scott.dowell@chicoca.gov



## Marysville District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

DIANA LANGLEY, PUBLIC WORKS  
DIRECTOR/CITY ENGINEER  
**City of Yuba City**  
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GENERAL MANAGER  
**Linda County Water District**  
1280 Scales  
Marysville, CA 95901  
ebullard@succeed.net

GENERAL MANAGER  
**Olivehurst Public Utility District**  
P.O.Box 670  
Olivehurst, CA 95961  
opudmgr@opud.org

JENNIFER STYCZYNSKI, SENIOR  
ACCOUNTANT  
**City of Marysville**  
P.O.Box 150  
Marysville, CA 95901  
jennifers@marysville.ca.us





**OROVILLE District**  
ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

Rath Moseley, General Manager  
**South Feather Water & Power**  
2310 Oroville Quincy Hwy  
Oroville, CA 95966  
rmoseley@southfeather.com

Ruth Wright  
**City of Oroville**  
1735 Montgomery St  
Oroville, CA 95965  
wrihtr@cityoforoville.org

Jayme Boucher  
**Thermalito Irrigation District**  
410 Grand Ave  
Oroville, CA 95965  
jboucher@twsd.info



## Westlake District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

CAROL PALMA  
**Las Virgenes Municipal Water District**  
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GEORGE CHEN, RATES MANAGER  
**City of Los Angeles, Department of  
Water & Power**  
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JOCELYN BLYSMA  
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