

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

Advice Letter Cover Sheet

Utility Name: California Water Service Company **Date Mailed to Service List:** 10/09/19

District: California Regulated Service Areas
Including Grand Oaks

CPUC Utility #: U-60-W **Protest Deadline (20th Day):** 10/29/19

Advice Letter #: 2351-A **Review Deadline (30th Day):** 11/08/19

Tier: ☒ 1 2 ☐ 3 Compliance **Requested Effective Date:** 09/09/19

Authorization: Decision 19-07-015

Description: Emergency Disaster Relief Customer Outreach Plan **Rate Impact:** N/A

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: Todd Pray

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Email: tpray@calwater.com

Utility Contact: Natalie Wales

Phone: 408-367-8566

Email: Nwales@calwater.com

DWA Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

DATE

STAFF

COMMENTS

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

[] 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[] WITHDRAWN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

October 9, 2019

Advice Letter No. 2351-A

To the California Public Utilities Commission:

California Water Service Company ("Cal Water") respectfully submits this Tier 1 advice letter submitting its emergency disaster relief customer outreach plan and requesting authority to make the following changes to tariffs applicable to multiple ratemaking areas.

New/Revised CPUC Sheet No.	Title of Sheet	Schedule No.	Cancelling CPUC Sheet No.
XXXXX-W	Table of Contents (Page 1)	TOC	XXXXX-W
XXXXX-W	Table of Contents (Page 3)	TOC	XXXXX-W
XXXXX-W	Catastrophic Event Memorandum Account (CEMA) pg 1	AG	9032-W
XXXXX-W	Catastrophic Event Memorandum Account (CEMA) pg 2	AG	9033-W

Background

The California Public Utilities Commission ("Commission") adopted D.19-07-015 on July 11, 2019. The decision implements an emergency disaster relief program for electric, natural gas, water, and sewer utility customers under the Commission's jurisdiction. The emergency disaster relief program is designed to ensure that utility customers who experience a housing or financial crisis due to a disaster, keep vital utility services and receive financial support in the wake of a disaster.

Discussion

According to D. 19-07-015, experience shows that some customers have relatively less access to information regarding emergency preparedness. In order for customers to have equal access to the protections provided in the decision, it is important to ensure that all utility customers are aware of the emergency customer protections before a disaster occurs. It is vital to raise awareness about the existence of the emergency protections before a disaster occurs so that customers are prepared. Therefore, the decision establishes a baseline of required outreach and education activities to ensure each utility's plan is robust to reach affected customers.

Ordering paragraph 13 states,

13. All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B



CALIFORNIA WATER SERVICE COMPANY

Advice Letter 2351-A Emergency Disaster Relief Customer Outreach Plan
Page 3

Water utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service).) shall file a Tier 1 Advice Letter 60 days from the effective date of this decision, setting forth the plan for customer outreach of these protections in English, Spanish, Chinese (including Cantonese, Mandarin, and other Chinese languages), Tagalog, and Vietnamese as well as Korean and Russian where those languages are prevalent within the utilities' service territories.

Submission of the attached emergency disaster relief customer outreach plan is made in compliance with the above ordering paragraph.

Supplement

This supplement to AL 2351 includes the revised tariff language outlined in Ordering Paragraph 10 of D. 19-07-015 for the Catastrophic Event Memorandum Account. While Cal Water believes the original Advice Letter was filed in compliance with D. 19-07-015, it agrees to make these revisions in a supplement per the Public Advocates Office recommendation from its protest letter dated September 27, 2019.

Ordering paragraph 10 states,

10. All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B Water utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service).) shall track the associated costs with the emergency customer protections in the respective Catastrophic Event Memorandum Accounts and extend their applicability of those memorandum accounts to costs for implementing customer protections for all disasters in which the Governor of California or the President of the United States has declared a state of emergency. Catastrophic Event Memorandum Accounts or Emergency Customer Protections Memorandum Account tariff language must specify that entries in the account will be segregated by qualifying event. Costs for emergency customer protection activities should be recovered across each utility's entire customer base and the water and sewer utilities stated above, shall make any necessary tariff changes in accordance with the advice letter procedures prescribed by General Order 96-B.

This advice letter is submitted with a Tier 1 designation pursuant to D. 19-07-015. Cal Water requests an effective date of **September 9, 2019** consistent with the original filing.



CALIFORNIA WATER SERVICE COMPANY

Advice Letter 2351-A Emergency Disaster Relief Customer Outreach Plan
Page 4

Notice

Customer Notice: This is a Tier 1 compliance filing consistent with Water Industry Rule 7.3.1(3). Water Industry Rule 3.2 of General Order 96-B indicates that this kind of Tier 1 filing does not require customer notice.

Service List: In accordance with General Order 96-B, General Rules 4.3 and 7.2, and Water Industry Rule 4.1, a copy of this advice letter will be mailed or electronically transmitted on October, 9 2019 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. When submitting a response or protest, please include the utility name and advice letter number in the subject line. 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 such a protest may not be made where it would require re-litigating 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 address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3rd floor
California Public Utilities Commission,
505 Van Ness Avenue, San Francisco, CA 94102
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 Cal Water at the following address:



CALIFORNIA WATER SERVICE COMPANY

Advice Letter 2351-A Emergency Disaster Relief Customer Outreach Plan
Page 5

Natalie Wales
California Water Service Company
1720 North First Street,
San Jose, California 95112
Fax 408/367-8430 or
E-mail nwales@calwater.com

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

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/

Todd Pray, Regulatory Program Manager

cc: Ting-Pong Yuen, Public Advocates Office

Emergency Disaster Relief Program

Outreach and Communication Plan

Objective

To demonstrate our commitment to our customers enduring hardship following natural disasters, and fulfill the provisions of the CPUC's D.19-07-015 to inform customers on an ongoing basis (at least twice per year) about options we have available to support and protect them. For wildfires in particular, customer outreach about available customer protections will occur before, during, and after a wildfire.

Key Messages

- California Water Service is committed to providing quality, service, and value to our customers, and part of this commitment includes supporting them when they have been impacted by natural disasters.
- We want our customers' water service/bills to be one less thing to worry about when they have been affected by a disaster, so we will implement a number of water service-related protections for all impacted customers following the disaster.
- We will also work with our customers individually if they need additional support.

Audiences

- Customers at large
- Low-income customers
- City/community leaders
- Media (secondary)

Provisions

- Waive any deposit requirements for residents and small businesses seeking to reestablish service for one year
- Expedite start/end service requests
- Automatically close accounts for homes destroyed and waive final bill
- Suspend disconnection for non-payment and related fees (late fees, deposits)
- Suspend collection activities for non-payment
- Stop any estimated usage for billing attributed to time when home unoccupied due to event
- Offer extended payment plan options on a case-by-case basis
- Provide bill credit for customers who had to evacuate, to account for time not able to be home, and/or prorate monthly service charge
- Provide additional bill credit for customers whose homes are not destroyed but are either damaged or uninhabitable for a time, and/or prorate monthly service charge
- Freeze certification reviews for low-income ratepayer assistance (LIRA) program participants affected, and make community-based assistance organizations aware of support/program to help reach low-income customers

Tactical Plan: Before a Disaster

Channel	Description	Due Date
Web site	Establish web page about Cal Water's Emergency Disaster Relief Program and provisions; provide links to same information in Spanish, Chinese, Tagalog, and Vietnamese; ensure accessibility for visually or otherwise-impaired customers	9/16/19
Customer Center lobby	Provide copies of general fact sheet available for customers to take that includes program info and provisions; translate and make available in Spanish, Chinese, Tagalog, and Vietnamese	9/16/19
Community leaders	Send email to city/county leaders regarding program and provisions for customers in disasters	9/16/19
Media	Prepare and distribute press release announcing program/provisions across wire and send to local outlets; tie to Emergency Preparedness Month (September)	9/16/19
Community-based organizations	Send email to appropriate organizations to make them aware of our program and provisions for customers in disasters	9/16/19
Social media	Post about program twice per year on Facebook and Twitter	Spring (Feb/March) and September
Customer bills	Run full-page bill insert (back of bill) with program information in English, Spanish, Chinese, Tagalog, and Vietnamese; add bill message on front of bill to note more information in back of bill	Spring and October
Customer Service/Field Reps	Provide details via intranet article to help CSRs respond to customer inquiries	9/16/19
Corporate Citizenship Report	Add paragraph on program in customer section of annual corporate citizenship report	Annually in September
Community events	Provide copies of general program fact sheet at any emergency preparedness-related events	Throughout year

Tactical Plan: During/After a Disaster

Channel	Description
Web site	Establish disaster-specific web page/alert about Cal Water provisions/assistance; link to general page for additional info; ensure accessibility for visually or otherwise-impaired customers
Customer email	Send email to customers affected by disaster with information on steps we are taking to support them or handle their account
Customer phone	Call affected customers who are unable to be reached via email
Community leaders	Send email to city/county leaders regarding specific actions we are taking following disaster and support we are offering to customers

Emergency Disaster Relief Program of California Water Service (September 2019)

Media	Send press release to local media outlets regarding specific support being offered to affected customers, to help inform affected customers
Social media	Post on Facebook and Twitter regarding specific support for affected customers; boost to affected community
Customer Service/ Field Reps	Provide talking points for CSRs specific to disaster on customer provisions, details on service interruptions/restoration, other support
Customer Center lobby	Provide any disaster-specific fact sheet at lobby counter and talking points to cashier
Water distribution center/care station	Provide copies of general program fact sheet or disaster-specific fact sheet along with water and possibly food staples
Community assistance events	Establish presence/ booth at community assistance events post-disaster as appropriate to assist affected customers

Other Activities

Activity	Description
CEMA Activation	Rates department to request activation of the CEMA effective to the time of the declaration of emergency.
Insurance Claims	Risk Management to make insurance claims on all costs and expenses incurred as a result of disaster. Rates and Accounting departments to ensure any insurance payments are credited to the CEMA.

Table of Contents - Page 1

The following listed tariff sheets contain all effective rates and rules affecting the rates and service of the Utility together with information relating thereto:

<u>Sheet</u>	<u>Subject Matter</u>	<u>Service Area</u>	<u>Schedule No.</u>	<u>CPUC Sheet No.</u>
Title Page				5613-W
Table of Contents				
Page 1	Table of Contents			XXXXX-W (C)
Page 2	Preliminary Statements			12103-W
Page 3	Preliminary Statements			12054-W
Page 4	Preliminary Statements			12017-W
Page 5	Rate Schedules - All Districts			XXXXX-W (C)
Page 6	Rate Schedules - District Specific			12068-W
Page 7	Rate Schedules - District Specific			12094-W
Page 8	Rate Schedules - District Specific			12102-W
Page 9	Rate Schedules - District Specific			12023-W
Page 10	Rate Schedules - District Specific			12081-W
Page 11	Service Area Maps			12080-W
Page 12	Rules			11860-W
Page 13	Rules			11643-W
Page 14	Sample Forms			12061-W
Page 15	Sample Forms			2926-W

(continued)

(To be inserted by utility)
Advice Letter No. 2351-A
Decision No.

Issued by
GREG A. MILLEMAN
Name
Vice President
TITLE

(To be inserted by CPUC)
Date Filed
Effective
Resolution No.

Table of Contents - Page 3

Preliminary Statements

<u>Sheet</u>	<u>Subject Matter</u>	<u>Service Area</u>	<u>CPUC Sheet No.</u>
<u>Preliminary Statements (continued)</u>			
M	(continued)		
		Stockton	ST
		Visalia	VS
		Westlake	WK
		Willows	WL
P	Department of Toxic Substances Control Memorandum Account (DTSC MA)		11943-W 12050-W 11941-W 11940-W 7446-W
Q	Home Emergency Insurance Solutions		10043-W
S	Water Cost of Capital Adjustment Mechanism (WCCM)		8013-W
T	Lucerne Balancing Account (LBA)		8017-W
U	Tort Litigation Memorandum Account (TLMA)		8446-W
V	PCE Litigation Memorandum Account (PCEL MA)		8154-W
W	TCP Litigation Memorandum Account (TCPL MA)		8156-W
X	Operational Energy Efficiency Program Memorandum Account (OEEP MA)		11322-W
Z1	Conservation Expense One-Way Balancing Account 1 (CEBA1)		10439-W
Z2	Conservation Expense One-Way Balancing Account 2 (CEBA2)		11321-W
Z3	Conservation Expense One-Way Balancing Account 3 (CEBA3)		11320-W
AA1	Pension Cost Balancing Account 1 (PCBA1)		10441-W
AA2	Pension Cost Balancing Account 2 (PCBA2)		10442-W
AA3	Pension Cost Balancing Account 3 (PCBA3)		11319-W
AB2	Health Care Cost Balancing Account (HCBA2)		10443-W
AB3	Health Care Cost Balancing Account (HCBA3)		11318-W
AC	Pressure Reducing Valve Modernization and Energy Recovery Memorandum Account (PRV MA)		8637-W
AD	Stockton Litigation Memorandum Account (SLMA)		10451-W
AE	2010 Tax Act Memorandum Account (TAMA)		
	Page 1		10444-W
	Page 2		10445-W
AG	Catastrophic Event Memorandum Account (CEMA)		XXXXX-W (C)
AG	Catastrophic Event Memorandum Account (CEMA) (Continued)		XXXXX-W (C)

(continued)

(To be inserted by utility)
Advice Letter No. 2351-A
Decision No.

Issued by
GREG A. MILLEMAN
Name
Vice President
TITLE

(To be inserted by CPUC)
Date Filed
Effective
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Preliminary Statement
 (continued)

AG. Catastrophic Event Memorandum Account (CEMA)

1. PURPOSE: The purpose of the CEMA is to record the costs of: restoring customers' utility service; repairing, replacing or restoring damaged utility facilities; and complying with government agency orders resulting from declared disasters. The CEMA shall also track associated costs with emergency customer protections and the implementation of those protections for all disasters.

(N)
 (N)

The authority to establish this memorandum account was granted in Ordering Paragraph 1 of CPUC Resolution E-3238, dated July 24, 1991.

Should a disaster occur, the utility will, if possible, inform the executive Director of the CPUC by letter within 30 days after the catastrophic event that the utility has started booking costs to the CEMA.

The letter shall specify the declared disaster, date, time, location, service area affected, impact on the utility's facilities, and an estimate of the extraordinary costs expected to be incurred, with costs due to expenses and capital items shown separately.

The utility shall not record any capital costs or expenses incurred prior to the start of the declared disaster or state of emergency, as identified by the appropriate authorities.

2. APPLICABILITY: The CEMA balance will be recovered from all customer classes, except those specifically excluded by the CPUC.

3. CEMA RATES: The CEMA does not currently have a rate component. Requests for recovery of any balance in the CEMA are to be processed according to General Order 96-B and Standard Practices or or requested in a general rate case. Requests for recovery shall include a showing that the costs to be recovered were not included in rates.

4. ACCOUNTING PROCEDURE:

- a. A debit entry equal to the amounts recorded in the utility's accounts that were incurred as a result of the disaster and related events. All entries in the account will be segregated by qualifying event.

(N)

- b. A debit entry equal to:

- (1) Depreciation expense on the average of the beginning and the end-of-month balance of plant installed to restore service to customers, or to replace, repair, or restore any plant or facilities, or to comply with government agency orders, in connection with events declared disasters, at one-twelfth of the annual depreciation rates approved by the CPUC for these plant accounts; plus
- (2) The return on investment on the average of the beginning and the end-of-month balance of plant installed to restore service to customers, or to replace, repair, or restore any plant or facilities, or to comply with government agency orders, in connection with events declared disasters, at one-twelfth of the annual depreciation rates approved by the CPUC for these plant accounts; plus
- (3) The return on the appropriate allowance for working capital using calculations last adopted by the CPUC for the utility, and the return in 4.b.(2) above; plus
- (4) The return on net cost of removal of facilities required as a result of the disaster and related events, using the return in 4.b.(2) above; less
- (5) The return on the average of beginning and end-of-month accumulated depreciation, and on average accumulated net deferred taxes on income resulting from the normalization of federal tax depreciation, using the rate of return in 4.b.(2) above.

(Continued)

(To be inserted by utility)

Advice Letter No. 2351-A

Decision No. -

Issued by

GREG A. MILLEMAN

NAME

Vice President

TITLE

(To be inserted by Cal. P.U.C.)

Date Filed _____

Effective _____

Resolution No. _____

Preliminary Statement

(continued)

AG. Catastrophic Event Memorandum Account (CEMA) (Continued)

4. ACCOUNTING PROCEDURE: (Continued)

- c. A debit entry equal to federal and state taxes based on income associate with item 4.b.(2) above, (L)
calculated at marginal tax rates currently in effect. This will include all applicable statutory adjustments. (L)

For federal and state taxes, this will conform to normalization requirements as applicable. Interest cost will be at the percentage of net investment last adopted by the CPUC with respect to the utility.

- d. A credit entry to transfer all or a portion of the balance in this CEMA to other adjustment clauses for future recovery, as may be approved by the CPUC.
- e. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the entries from 4.a. through 4.c. above, at a rate equal to one-twelfth of the interest on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication until a final Commission determination on rate recovery for the amount.

Entries in items 4.a. and 4.b. above shall be made net of the appropriate insurance proceeds.

5. FINANCIAL REPORTING: The utility may, at its discretion, record the balance in the CEMA as a deferred debit on its balance sheet with entries to the appropriate income statements as necessary.

(Continued)

(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 2351-A

GREG A. MILLEMAN

Date Filed _____

Decision No. -

NAME
Vice President
TITLE

Effective _____

Resolution No. _____



Antelope Valley District
ADVISE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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

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

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

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

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

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

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

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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

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

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

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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