

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



January 23, 2020

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. 2356, filed on November 8, 2019, regarding Wildfire Disaster Relief Compliance Filing (Kincade Fire).

Enclosed is a copy of the advice letter with an effective date of December 8, 2019 for the utility's files.

Please contact Kevin Truong at 415-703-1353, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant
Water & Sewer Advisory Branch
Water Division

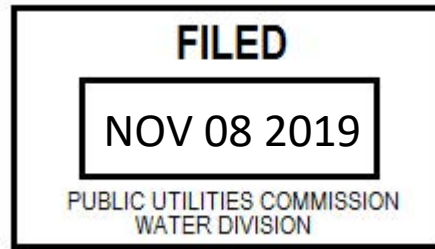
Enclosures



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

November 8, 2019

Advice Letter No. 2356



To the California Public Utilities Commission:

California Water Service Company ("Cal Water") respectfully submits this Tier 1 advice letter in compliance with Ordering Paragraph 9 of D.19-07-015, *Decision Adopting an Emergency Disaster Relief Program for Electric, Natural Gas, Water and Sewer Utility Customers* with regard to the impact of the Kincade Fire on customers in the Redwood Valley area of Cal Water's Bay Area Region.

Summary

D.19-07-015 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 the emergency customer protections and outreach activities required by D.19-07-015.

Background

In D.19-07-015, the Commission provided as follows in Ordering Paragraph 9:

9. In the event the Governor of California or the President of the United States 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, all Class-A Water utilities ... shall file a Tier 1 Advice Letter within 15 days of the Governor's or the President of the United States state of emergency proclamation reporting compliance with implementing this Decision's mandated emergency customer protections and outreach activities.

The Commission also adopted the following Conclusion of Law relevant to Ordering Paragraph 9:

25. It is reasonable to require the water and sewer corporations, as identified in Conclusion of Law 2, to file a Tier 1 advice letter with the Commission's Water Division within 15 days of a governor's state of emergency proclamation and/or a presidential state of emergency demonstrating implementation of the following emergency customer protections: (1) activation of their CEMA effective to the time of the declaration of emergency; (2) make insurance claims on all costs and expenses incurred as a result of the fires, and credit insurance payments to their CEMA; (3) work cooperatively with affected customers 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; (5) provide reasonable payment options to affected customers; and (5) [sic] waive bills for victims who lost their homes or if their homes are rendered uninhabitable; and (6) [sic] authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.

Discussion

On October 27, 2019, Governor Gavin Newsom proclaimed a State of Emergency in California “due to the extreme fire weather conditions.”¹ As a result of the Kincade Fire in Sonoma County, customers in the Guerneville area of Cal Water’s Redwood Valley District were required to evacuate for several days. Cal Water is not aware of any losses to homes or facilities resulting from the Kincade Fire.

In compliance with Ordering Paragraph 9 and Conclusion of Law 25 of D.19-07-015, Cal Water stipulates as follows:

1. Activation of the CEMA;
 - Cal Water is evaluating the costs associated with the wildfire and tracking its costs using an accounting “product code.” 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;
 - If Cal Water determines that there have been losses related to the Kincade Fire, Cal Water will file insurance claims 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 may have difficulty paying their bills as a result of the Kincade Fire, 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;

¹ <https://www.gov.ca.gov/wp-content/uploads/2019/10/2019-17-Fire-weather-conditions-State-of-Emergency-Signed-10.27.19.pdf>



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- For customers who may have difficulty paying their bills as a result of the Kincade Fire, 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 wildfire.
- 6. Waive bills for victims who lost their homes or if their homes were rendered uninhabitable.
 - Cal Water is not aware of any customers whose homes were lost or rendered uninhabitable as a result of the Kincade Fire.
- 7. Authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.
 - Cal Water will provide a pro rata credit to customers impacted by the mandatory evacuation triggered by the Kincade Fire.
- 8. Customer outreach regarding emergency disaster relief program.
 - Cal Water is providing information about its emergency relief protections to customers consistent with its Outreach Plan, as submitted in Advice Letter 2351-A.

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 8, 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. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter. A protest objects



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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:

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 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

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



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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/

Natalie Wales

Director of Regulatory Policy and Compliance

cc: Ting-Pong Yuen, Public Advocates Office of the CPUC