

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 24, 2021

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

Dear Ms. Wales,

The Water Division of the California Public Utilities Commission has approved California Water Service Company's Advice Letter No. 2427, filed on October 21, 2021, regarding conclusion of Emergency Customer Protections for 2020 Wildfires and Extreme Heat for the Salinas Valley Region district.

Enclosed is a copy of the advice letter with an effective date of October 21, 2021 for the utility's files.

Please contact Kevin Truong at VT4@cpuc.ca.gov or 415-703-1353, if you have any questions.

Thank you.

Enclosures

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

Advice Letter Cover Sheet

Utility Name: California Water Service Company	Date Mailed to Service List: 10/21/2021
District: Salinas Valley Region	
CPUC Utility #: U-60-W	Protest Deadline (20th Day): 11/10/2021
Advice Letter #: 2427	Review Deadline (30th Day): 11/20/2021
Tier: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> Compliance	Requested Effective Date: 10/21/2021
Authorization: D.19-07-015	
Description: Conclusion of Emergency Customer Protections for 2020 Wildfires and Extreme Heat	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

Utility Contact: Albree Jewell

Phone: 916-205-4539

Email: ajewell@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[] WITHDRAWN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: _____

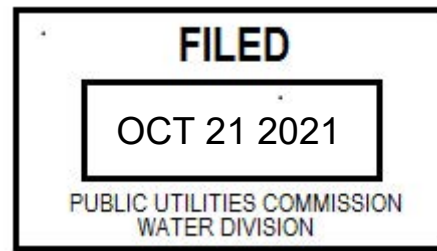


CALIFORNIA WATER SERVICE COMPANY

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

October 21, 2021

Advice Letter No. 2427



To the California Public Utilities Commission:

California Water Service Company ("Cal Water") respectfully submits this Tier 1 advice letter in compliance with Ordering Paragraph 11 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 conclusion of its emergency customer protections due to fires and extreme heat, which occurred statewide starting in mid-August of 2020. *Please note that, due to limitations on non-essential travel as a result of the COVID-19 virus, this advice letter will only be distributed electronically to the Water Division and the attached service lists.*

Summary

This Tier 1 advice letter confirms Cal Water's compliance with the emergency customer protections triggered by the statewide wildfire and extreme heat emergencies declared in California starting in mid-August of 2020¹. Cal Water's Salinas Valley Region was impacted by this emergency.

Background

In mid-August of 2020, Governor Gavin Newsom signed two Emergency Proclamations relating to "extreme heat" and statewide wildfires in the State of California.² Cal Water filed Advice Letter 2389 on August 31, 2020, confirming Cal Water's compliance with the emergency customer protections and outreach activities required by D.19-07-015.

D.19-07-015 requires water and sewer companies to file a Tier 1 advice letter 12 months after a state of emergency was proclaimed for an event affecting the water or sewer company. This Tier 1 advice letter is intended to notify the California Public Utilities Commission the conclusion of its emergency customer protections.

In D.19-07-015, the Commission provided as follows in Ordering Paragraph 11:

¹ <https://www.gov.ca.gov/wp-content/uploads/2020/08/8.18.20-Fire-State-of-Emergency-Proclamation.pdf>;
<https://www.gov.ca.gov/wp-content/uploads/2020/08/8.16.20-Extreme-Heat-Event-proclamation-text.pdf>;

² <https://www.gov.ca.gov/wp-content/uploads/2020/08/8.18.20-Fire-State-of-Emergency-Proclamation.pdf>;
<https://www.gov.ca.gov/wp-content/uploads/2020/08/8.16.20-Extreme-Heat-Event-proclamation-text.pdf>;



11. All Class-A Water utilities ... shall file a Tier 1 Advice Letter at the default, 12-month conclusion of customer protection period (running from the date that customer protections related to the specific disaster became effective), or as reasonably determined by the Governor's Office of Emergency Services, detailing the mandated protections offered to the customer affected by the disaster, the start and end periods customers received the emergency customer protections, the outreach efforts conducted, the customer impacts, and the associated cost.

The Commission also adopted the following Conclusion of Law relevant to Ordering Paragraph 11:

10. It is reasonable to require the [...] water, and sewer utilities, as identified in Conclusion of Law 2, to conclude the administration of the mandated customer protections no sooner than twelve (12) months from the date of the emergency proclamation or as appropriately determined by the Governor's Office of Emergency Services and to affirmatively communicate with customers throughout the duration of the protection period about the timeline of protections

Discussion

During August and September of 2020, several instances of extreme heat, rolling blackouts, and fires occurred within Cal Water's service areas. One in particular severely impacted customers: the Salinas River Fire (or River Fire) affecting our Salinas service area.

Following issuance of the Governor's emergency proclamations in August 2020, and in accordance with D.19-07-015, Cal Water confirms that it implemented the required customer protections including working cooperatively with customers to establish reasonable payment options, waiving any reconnection fees for impacted customers, automatically closing accounts for homes destroyed and waiving final bills, expediting start/end service requests, and providing bill credits for customers who had to evacuate.

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. Several of the mandated customer protections were already in place due to COVID-19 and we continue to work with our customers individually if they need additional support. Cal Water regularly communicates about emergency customer protections through bill inserts, and when customer protections are implemented, we communicate with the affected customers comprehensively via emails, phone calls, and our website (ensuring accessibility for visually or



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otherwise-impaired customers) in both Spanish and English, the languages commonly spoken in our service areas.

For the Salinas River Fire, we sent emails to customers affected by the disaster with information on steps we are taking to support them and handle their account. If we could not get ahold of them by email, we called them directly. Cal Water was made aware of 6 customers' homes that were destroyed and one damaged due to the River Fire. Cal Water waived the final bills for these customers who lost their homes as a result of this event. Cal Water also provided a pro rata credit of \$20 to the roughly 1,622 customers impacted by the mandatory evacuation triggered by these events that occurred between 8/16/2020 and 8/26/2020. Finally, Cal Water included a message to all active accounts that were impacted by the River Fire that they should not be charged any reconnection fees.

In terms of the costs associated with implementing these customer protection, a total of \$32,440 were provided to customers in credits related specifically to the mandatory evacuation. Other costs, such as employee resources to implement the customer protections, are embedded in rates and were not tracked separately. Note that one available metric is the number of customers that received extended payment plans. In the Salinas Valley Region, Cal Water has roughly 139,000 customers. Approximately 1,622 customers were impacted by mandatory evacuation during this disaster. Between August 18, 2020 and September 18, 2020, 104 customers signed up for payment arrangements in the Salinas Valley Region. Cal Water cannot, however, identify the percentage of payment arrangements that were requested specifically as a result of the River Fire.

Requested Effective Date

Pursuant to OP 11 of D.19-07-015, this is filed as a Tier 1 advice letter. Cal Water does not request a specific effective date since this is a compliance filing without changes to Cal Water's tariffs.

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 transmitted electronically on **October 21, 2021** to competing and adjacent utilities and other utilities or interested parties having requested such notification. ***Please note that, due to limitations on non-essential travel as a result of the COVID-19 virus, this advice letter will only be distributed electronically.***

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



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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 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 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:

Natalie Wales
California Water Service Company
1720 North First Street,
San Jose, California 95112
E-mail: cwsrates@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, and ask for the Rates Department.



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/s/

Natalie Wales,
Director, Regulatory Policy & Compliance

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



Salinas District (Salinas Valley Region)

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

BRIAN FRUS, SENIOR CIVIL ENGINEER

City of Salinas

200 Lincoln Ave
Salinas, CA 93901
brianf@ci.salinas.ca.us

CHRISTOPHER A. CALLIHAN, CITY

ATTORNEY

City of Salinas

200 Lincoln Ave
Salinas, CA 93901
chrisc@ci.salinas.ca.us

Park Billing Company

P.O.Box 910
Dixon, CA 95620
parks@parkbilling.com

TOM ADCOCK

Alco Water Service

249 Williams Rd
Salinas, CA 93905
andrea@alcowater.com

Gavilan Water Company

644 San Juan Grade Road
Salinas, CA 93906

Monterey County Administration

855 East Laurel Drive, Bldg C
Salinas, CA 93905

ONLY FOR SERVICE AREA MAPS:

EXECUTIVE OFFICER

Monterey County LAFCO

P.O. Box 1369
Salinas, CA 93902

FIRE CHIEF

City of Salinas

200 Lincoln Ave
Salinas, CA 93901



King City District (Salinas Valley Region)

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

STEVE ADAMS

King City

212 S. Vanderhurst Ave
King City, Ca 93930
sadams@kingcity.com

PARK BILLING COMPANY

P.O.Box 910
Dixon, CA 95620
parks@parkbilling.com

LITTLE BEAR WATER COMPANY

51201 Pine Canyon Rd, Space #125
King City, CA 93930

ONLY FOR SERVICE AREA MAPS:

FIRE CHIEF

King City

212 S. Vanderhurst Ave
King City, CA 93930

KATE MCKENNA, EXECUTIVE OFFICER

LAFCO of Monterey County

P.O. Box 1369
Salinas, CA 93902
mckennak@monterey.lafco.ca.gov