

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

Advice Letter Cover Sheet

Utility Name: Cold Springs Water Company
District: N/A
CPUC Utility #: WTC-176
Advice Letter #: 74-W
Tier: 1 2 3 Compliance
Authorization: March 26, 2020 PUC Letter
Description: Suspending Turn-off during COVID-19 and Activating CEMA

Date Mailed to Service List: Apr. 9, 2020
Protest Deadline (20th Day): Apr 29, 2020
Review Deadline (30th Day): May 9, 2020
Requested Effective Date: Mar 4, 2020
Rate Impact: \$0.0
0.0%

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: Frank Brommenschenkel
Phone: 805-525-4200
Email: Frank.brommen@verizon.net

Utility Contact: Pete Kerns
Phone: 209-965-3716
Email: office@coldspringwater.com

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

DWA USE ONLY

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

APPROVED

WITHDRAWN

REJECTED

Signature: _____

Comments: _____

Date: _____

COLD SPRINGS WATER COMPANY

29820 Highway 108, Cold Springs, CA 95335, office@coldspringwater.com 209-965-3716

April 9, 2020

Advice Letter No. 74-W

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Cold Springs Water Company, Inc. (CSWC) hereby transmits a PDF copy for filing of this Advice Letter (AL) 74-W:

REQUEST\PURPOSE

By AL 74-W, CSWC requests compliance with the March 26, 2020 letter to Class B, C, and D Water and Sewer Utilities, signed by Alice Stebbins, Executive Director, regarding Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency. Please activate CSWC CEMA on the effective date of Advice Letter 74-W.

BACKGROUND

On March 4, 2020, Governor Newsom declared a Statewide emergency due to an outbreak of a respiratory illness caused by COVID-19. In response, CSWC suspended disconnections for nonpayment and implemented flexible payment plans for all residential and non-residential customers. These measures will remain in place until further notice.

ELIGIBILITY REQUIREMENTS FOR EMERGENCY CUSTOMER PROTECTIONS

Through this advice letter, CSWC will implement consumer protections as described below for customers who self-certify that they have been financially affected by COVID-19, effective March 4, 2020, and will remain in place until March 4, 2021, or until otherwise ordered by the Commission.

CSWC customers who self-certify that they are experiencing economic hardship due to COVID-19 will have their accounts identified or flagged in CSWC's Customer Service System (CSS) as eligible for billing and credit protections as extended by the Commission. CSWC will provide the following billing and credit protections:

1. Suspend disconnections for affected customers

When a customer self-identifies to CSWC as being affected by COVID-19, CSWC will suspend disconnections activities for those customers.

2. Waive deposit requirements and late fees

COLD SPRINGS WATER COMPANY

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When a customer self-identifies to CSWC as affected by COVID-19, CSWC will immediately confirm that the customer accounts are flagged and ensure that late fees and deposit requirements for reestablishment of credit are waived.

3. **Implement flexible payment plan options**

CSWC will collaborate with affected customers to establish reasonable payment arrangements based upon the individual customer's needs. CSWC may also recommend agency assistance and programs available to qualifying, affected customers. At a minimum, CSWC will collaborate with customers who have prior arrearages to establish the following bill payment arrangements:

- Initial payment no greater than 20 percent of the amount due; and
- The remainder in equal installments over at least 12 billing cycles.

For those affected customers with utility service but who go into arrearage after March 4, 2020, CSWC will establish the following bill payment arrangement:

- Initial payment no greater than 20 percent of the amount due; and
- The remainder in equal installments over at least 8 billing cycles.

TIER DESIGNATION AND REQUESTED EFFECTIVE DATE

This AL is submitted pursuant to the above referenced March 26, 2020 letter Subject to CPUC action to ratify this direction, the utilities and service providers will be expected to file an Advice Letter (Tier I) reporting compliance with implementing the mandated customer protections.¹

NOTICE

A copy of this AL has been served to all parties listed on the service list² on the last page of this AL. This filing will not cause withdrawal of service nor conflict with any other schedule or rule.

RESPONSE OR PROTEST³

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

¹ GO. 96-B, Water Industry Rule 7.3.1

² GO. 96-B, Water Industry Rule 4.1

³ GO. 96-B, General Rule 7.4.1

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1. The utility did not properly serve or give notice of the AL;
2. The relief requested in the AL 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 AL contain material error or omissions;
4. The relief requested in the AL is pending before the Commission in a formal proceeding;
or
5. The relief requested in the AL requires consideration in a formal hearing, or is otherwise inappropriate for the AL process; or
6. The relief requested in the AL is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require re-litigating a prior order of the Commission.

A protest may not rely on policy objections to an AL where the relief requested in the AL follows rules or directions established by statute or Commission order applicable to the utility.

A protest shall provide citations or proofs where available to allow staff to properly consider the protest. The Water Division must receive a response or protest via email (**or** postal mail) within 20 days of the date the AL is filed. The addresses for submitting a response or protest are:

Email Address:

Water.Division@cpuc.ca.gov

Mailing Address:

California Public Utilities Commission
Water Division, 3rd Floor
505 Van Ness Avenue
San Francisco, CA 94102

On the same day the response or protest is submitted to Water Division (WD), the respondent or protestant shall send a copy of the protest to Pete Kerns at: Cold Springs Water Company, Inc.

Email Address:

Office@coldspringwater.com

Mailing Address:

Cold Springs Water Company
29820 Highway 108
Cold Springs, CA 95335

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform DWA, 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. Any reply must be received by DWA within five business days after the end of the protest period, and shall be served on the same day on each person who filed the protest or response to the AL.⁴

⁴ GO. 96-B, General Rule 7.4.3

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SERVICE LIST

Recipient 1 Del Oro Water Company
Attn: Bob Fortino
robert@corporatecenter.us

Recipient 2 Bruce Ramsden, P.E.
Associate Sanitary Engineer
State Water Resources Control Board
Division of Drinking Water – Merced District (11)
(559) 447-3314 Bruce.Ramsden@waterboards.ca.gov

Recipient 3 Tuolumne Utilities District
Attn: Don Perkins
18885 Nugget Road
Sonora, CA 95370
don.perkins@tudwater.com

I hereby certify that the above service list has been served a copy of AL 74-W on Thursday, April 9, 2020.

Executed in Santa Paula, California on April 9, 2020.

Cold Springs Water Company

By: /s/Frank Brommenschenkel
Pete Kerns
President

Enclosures