

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

Advice Letter Cover Sheet

Utility Name: Penngrove Water Company
District: Penngrove Town
CPUC Utility #: 120
Advice Letter #: 117
Tier: 1 2 3 Compliance
Authorization: Compliance with Executive Director March 26, 2020
Instructions:

Date Mailed to Service List: 6/1/2020
Protest Deadline (20th Day): 5/20/2020
Review Deadline (30th Day): 6/1/2020
Requested Effective Date: 3/4/2020

Rate Impact: N/A

Description: Emergency Disaster Customer Protections
COVID19

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: Julie Cavaz
Phone: 707-539-6397
Email: Julie@mfccomputing.com

Utility Contact: Jim Downey
Phone: 707-539-6397
Email: jbdwny@cs.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WITHDRAWN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: _____

Penngrove Water Company

4982 Sonoma Hwy.
Santa Rosa, CA 95409

Advice Letter 117-W

Penngrove Water Company of Emergency Customer Protections

Penngrove Water Company transmits this Tier 1 informational advice letter filing to notify the California Public Utilities Commission (“CPUC” or “Commission”) that PWC has already voluntarily implemented certain customer protections and is complying with the May 7, 2020 letter from Bruce DeBerry, CPUC Water Division Manager, to all Class C and D water and sewer utilities to provide applicable “*Customer Protections directed in D.19-07-015 and D.19-08-025 in response to the declared state of emergency cause (sic) by the COVID-19 pandemic and activation of the Catastrophic (Event) Memorandum Account (CEMA)*”.

Background and Compliance with Executive Director Stebbins’ Instructions

On April 2, 2020, PWC responded to the March 26, 2020 Alice Stebbins letter and provided information regarding the applicable customer protection measures voluntarily taken by PWC thus far to protect customers by continuing water service to residential customers who are unable to pay their bills because of the COVID-19 State of Emergency. (See copy of PWC’s “Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency” letter, attached hereto). That letter described additional steps taken by PWC to keep its customers and workforce healthy. Some of these actions include:

- Staggering workschedules.
- Closing business office lobby to the public.
- Increasing frequency and intensity of cleanings and disinfection of facilities and equipment.
- Limiting meeting sizes.
- Providing soap, hand sanitizers, disinfecting wipes, gloves, masks and other safety equipment and materials in all common areas and field trucks.
- Frequently communicating with employees on developments, company updates, social distancing measures and personal hygiene best practices.
- Reminding employees to stay home if sick.

Penngrove Water Company

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- Working with local health officials and emergency personnel to advise PWC and ensure the utility takes all appropriate steps to support a healthy workforce and community.

On May 7, 2020 Bruce DeBerry, CPUC Water Division Manager, sent a letter to all Class C and D water and sewer utilities requesting them to file a Tier 1 advice letter “to provide Customer Protections directed in D.19-07-015 and D.19-08-025 in response to the declared state of emergency cause (sic) by the COVID-19 pandemic and activation of the Catastrophic (Event) Memorandum Account (CEMA).”

On March 20, 2020, PWC invoked its Catastrophic Event Memorandum Account (CEMA) starting to track costs, starting March 4, 2020, incurred by PWC in response to a catastrophic event that has been officially declared a disaster or state of emergency by government authorities.

PWC is a Class d water utility and is not one the water or sewer corporations covered under the Commission’s Decision 19-07-015 or Decision 19-08-025; see Conclusion of Law 2 from Decision 19-07-015 above. The COVID-19 State of Emergency declared by both the Governor of California on March 4, 2020 and by the President of the United States on March 13, 2020, has not “*disrupted the delivery or receipt of utility service and/or the degradation of the quality of utility service*” to any of PWC’s customers. PWC has not experienced any loss, disruption, or degradation of the water service that it provides to its customers due to the COVID-19 state of emergency.

Although the customer protection measures adopted in CPUC Decision 19-07-015 and Decision 19-08-025 do not apply to Class C water or sewer utilities, and although there has been no loss, disruption, or degradation of PWC’s service provided to its customers, LVWC has voluntarily taken certain actions and implemented certain applicable customer protections to assist its customers in response to the COVID-19 State of Emergency Declarations.

With this Tier 1 information only advice letter filing, PWC is confirming these voluntary actions and voluntarily implemented applicable customer protections taken by PWC as described in the previous letters from PWC to the Commission. Further, PWC states that such applicable customer protections will continue during the pendency of the COVID-19 State of Emergency. Again, these voluntary actions and voluntarily implemented applicable customer protections are as follows:

Other Actions by PWC

March 20, 2020 and April 2, 2020 of such actions and applicable customer protections.

Penngrove Water Company

4982 Sonoma Hwy.
Santa Rosa, CA 95409

PWC voluntary actions and voluntarily implemented applicable customer protections are as follows:

- Activated its Catastrophic Event Memorandum Account (CEMA) starting March 4, 2020 and notified the Executive Director of the CPUC and Water Division.
- Temporarily suspended discontinuation of service for non-payment of waterbills.
- Offered extended payment plan options to customers.
- Working cooperatively with customers to resolve unpaid bills.
- Notified customers via bill insert / direct mailer in a letter to customers to contact PWC if they are having difficulty paying their water bill due to financial hardships that they may be experiencing as a result of the COVID-19 health crisis.

Further, with the April 2, 2020 letter to the Commission, PWC described additional steps taken by PWC to keep its customers and workforce healthy, some of which include:

- Staggering work schedules.
- Closing business office lobby to the public.
- Increasing frequency and intensity of cleanings and disinfection of facilities and equipment.
- Providing soap, hand sanitizers, disinfecting wipes, gloves, masks and other safety equipment and materials in all common areas and field trucks.
- Frequently communicating with employees on developments, company updates, social distancing measures and personal hygiene best practices.
- Reminding employees to stay home if sick.

No Effect on Water Service

This Advice Letter filing will not cause the withdrawal of service, nor conflict with other schedules or rules.

TIER DESIGNATION

This is a Tier 1 Advice Letter pursuant to General Order 96-B and Water Industry Rule 7.3.1(3) (Compliance with mandatory statute, decision, or resolution).

Penngrove Water Company

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NOTICE AND SERVICE

As this Advice Letter is for compliance with Executive Director Stebbins' March 26, 2020 letter, no additional notice to customers is required.

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 may not rely on policy objections to an Advice Letter where the relief requested in the Advice Letter 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 mail within 20 days of the date the Advice Letter is filed. The addresses for submitting a response or protest are:

Mailing Address:

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

Email Address:

Water.Division@cpuc.ca.gov

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Mailing Address:

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

Email Address:

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 of the protest to PWC at:

Email Address:

julie@mfccomputing.com

Mailing Address:

4982 Sonoma Highway
Santa Rosa, CA 95409

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.

SERVICE LIST

City of Santa
Rosa PO Box
1658
Santa Rosa, CA 95402

Valley of the Moon Water
District PO Box 280
El Verano, CA 95433-0280

Kinneybrook
Mutual PO Box
1234

Penngrove Water Company

4982 Sonoma Hwy.
Santa Rosa, CA 95409

I hereby certify that the above service list has been served a copy of AL 109 on 6/1/2020

Executed in Santa Rosa, California.

Penngrove Water Company

By: 

Julie Cavaz
Manager

Penngrove Water Company

4982 Sonoma Hwy.
Santa Rosa, CA 95409

EMERGENCY CUSTOMER PROTECTIONS

Penngrove Water Company Customer Protections provide protections for customers due to the COVID - 19 pandemic.

Utility shall:

1. Suspend disconnections of water service for delinquent accounts.
2. Work cooperatively with affective customers to resolve unpaid bills and minimize disconnections for non- payment.
3. Waive reconnection or facilities fees for affective customers and suspend deposits for affective customers who must reconnect tot the system.
4. Provide reasonable payment options to affected customers.