

April 1, 2020

**ADVICE 118-W
(U 338-W)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
WATER DIVISION

SUBJECT: Implementation of Emergency Disaster Relief Program for Santa Catalina Island Water Customers Relating to COVID-19 Pursuant to Decision 19-07-015 and the Executive Director's March 17, 2020 Letter to Water Companies

Southern California Edison Company (SCE) hereby submits to the California Public Utilities Commission (Commission) the following changes to its tariffs. The revised tariff sheets are listed on Attachment A and are attached hereto.

PURPOSE

Pursuant to Ordering Paragraph (OP) 9 of Decision (D.)19-07-015, and the Executive Director's March 17, 2020 Letter to Water Companies¹ (ED's Letter),² SCE submits this advice letter to implement emergency customer protections for water customers on Santa Catalina Island experiencing a financial crisis due to the novel coronavirus (COVID-19) pandemic. In addition, SCE is modifying its Rule 6, Establishment and Reestablishment of Credit and Rule 11, *Discontinuance and Restoration of Service* to address the customer protections provided herein.

BACKGROUND AND DISCUSSION

On March 4, 2020, Governor Newsom declared a Statewide emergency due to an outbreak of a respiratory illness caused by COVID-19. In response, SCE 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.

¹ The Executive Director's letter was provided to Small Water Companies by the California Water Association (CWA) via email.

² See *Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency*, March 17, 2020. Available at <https://www.cpuc.ca.gov/covid>.

In addition, March 19, 2020 SCE submitted Advice 230-G/4174-E to the Energy Division implementing COVID-19 customer protections consistent with the intent of D.19-07-015. These same customer protections apply, as applicable, to water customers on Santa Catalina Island. However, because COVID-19 is a unique scenario that has not previously been considered for emergency consumer protections, SCE is implementing aspects of the consumer protections that are appropriate at this time. Furthermore, SCE is considering additional measures to support its customers and communities during this crisis and will seek Commission approval in other appropriate venues. SCE proposes to supplement this advice letter by late June 2020, if necessary, to evaluate conditions to determine whether the protections should remain in place, be extended, or be discontinued.

Eligibility Requirements for Emergency Customer Protections

Through this advice letter, SCE 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.

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

1. Suspend disconnections for affected customers

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

2. Waive deposit requirements and late fees

When a customer self-identifies to SCE as affected by COVID-19, SCE 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

SCE will collaborate with affected customers to establish reasonable payment arrangements based upon the individual customer's needs. SCE may also recommend agency assistance and programs available to qualifying, affected customers. At a minimum, SCE 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, SCE 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.

SCE has trained its dedicated call center staff to inform and support customers to determine if there are other programs available to provide financial assistance or determine if extended payment arrangements should be made.

4. Freeze all California Alternate Rates for Energy (CARE) eligibility reviews

SCE will freeze CARE program standards and high usage post-enrollment verifications. SCE has implemented this for all customers until further notice and will continue the practice for affected customers until March 4, 2021, or unless otherwise discontinued or extended by the Commission.

Customer Communication and Qualification Plan

Southern California Edison (SCE) has added a banner on www.sce.com to provide customers with valuable information regarding SCE's response to the COVID-19 pandemic and customer protections during the emergency. Detailed information on SCE's response to the COVID-19 emergency is available at www.sce.com/safety/coronavirus, including a video from Pedro Pizarro, President, and CEO of Edison International, describing SCE's response to the COVID-19 emergency, including suspending service disconnections for non-payment and waiving late fees for residential and business customers. A link to SCE's Bill Assistance Programs webpage (www.sce.com/billhelp) is provided for customers impacted by the COVID-19 emergency. Additional information regarding planned power outages, SCE's telework program, CDC, and WHO recommended precautions to avoid transmission of COVID-19, and warning customers of possible scams during the outbreak is also provided, along with links to the CDC and WHO.

SCE will continue to communicate with all customers to inform them about their eligibility for SCE's emergency disaster relief program through targeted messaging using the customers' preferred methods of contact to inform them of the eligibility for customer protections. In addition, SCE partners with its network of over 100 non-profit community and faith-based organizations across its vast service territory to assist customers in enrolling in income-qualified programs such as CARE.

Memorandum Account Tracking of Customer Protections Costs

SCE's Catalina water utility currently does not have an appropriate memorandum account established to track and record costs associated with emergency customer protections pursuant to D.19-07-015. Ordering Paragraph 10 of D.19-07-015 authorizes water utilities to track associated costs of emergency customer protections in either a Catastrophic Event Memorandum Account or Emergency Customer Protections Memorandum Account. Currently, all costs related to emergency customer protections are being tracked in the Emergency Customer Protections Memorandum Account for SCE's electric utility operations. The costs recorded to this memorandum account will be incurred beginning March 4, 2020, which is the date of the Governor's State of Emergency declaration. The protections will be in effect for one year until March 4, 2021, unless otherwise discontinued or extended by order of the Commission. SCE plans to subsequently submit an advice letter requesting authority to establish a Catastrophic Event Memorandum Account for the Catalina water utility pursuant to Resolution E-3238 and D.19-07-015.

PROPOSED TARIFF CHANGES

SCE's Water Rule 6, Establishment and Reestablishment of Credit, Section B, is modified as follows:

B. Reestablishment of Credit.

The following terms and conditions relating to the reestablishment of credit will not apply until further notice to customers who self-certify that they have been financially affected by COVID-19:

1. An applicant who previously has been a customer of SCE and whose water service has been discontinued by SCE during the last twelve months of that prior service because of nonpayment of bills, may be required to reestablish credit by depositing the amount prescribed in Rule 7 for that purpose, and by paying water bills regularly due; except an applicant for domestic service will not be denied service for failure to pay such bills for other classes or service...

SCE's Water Rule 11, Discontinuance and Restoration of Service, Section C, is modified as follows:

C. Nonpayment of Bills.

The following terms and conditions relating to disconnections for nonpayment will not apply until further notice to customers who self-certify that they have been financially affected by COVID-19:

1. When a bill for water service has become past due and a 15-day discontinuance of domestic service notice or a 5-day discontinuance of nondomestic service notice for nonpayment has been issued, service may

be discontinued if bill is not paid within the time required by such notice. A customer's service, however, will not be discontinued for nonpayment until the amount of any deposit made to establish credit for that service has been fully absorbed...

No cost information is required for this advice letter.

This advice letter will not increase any rate or charge, withdraw service, or conflict with any other schedule, or rule.

TIER DESIGNATION

Pursuant to General Order 96-B, Water Industry Rule 7.3.2(5), and OP 9 of D.19-07-015, this advice letter is submitted with a Tier 1 designation.

EFFECTIVE DATE

This advice letter will become effective on April 1, 2020, the same date as submitted.

NOTICE

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be submitted to:

Director, Water Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
E-mail: water_division@cpuc.ca.gov
Facsimile: (415) 703-2200

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Facsimile: (626) 302-6396
Telephone: (626) 302-9645
E-mail: AdviceTariffManager@sce.com

Laura Genao
Managing Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

SCE is serving copies of this advice filing to the service list for interested parties shown on the attached Water GO 96-B, R.18-03-011, R.10-02-005, A.14-11-007, R.13-11-005, A.17-01-013 et al., A.16-09-001, and R.15-05-006 service lists in accordance with Water Industry Rule 4.1 of GO 96-B. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice filing at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Cooper Cameron at (626) 302-3406 or by electronic mail at Cooper.Cameron@sce.com.

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

GAS:cc:jm
Enclosures

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

Advice Letter Cover Sheet

Utility Name: Southern CA Edison

Date Mailed to Service List: Apr. 1, 2020

CPUC Utility #: WTC 338

Protest Deadline (20th Day): Apr. 21, 2020

Advice Letter #: 118-W

Review Deadline (30th Day):

Tier 1 2 3 Compliance

Requested Effective Date: Apr. 1, 2020

Authorization Decision 19-07-015

Rate Impact: \$

Description: Implementation of Emergency Disaster Relief Program for Santa Catalina Island Water Customers Relating to COVID-19 Pursuant to Decision 19-07-015 and the Executive Director's March 17, 2020 Letter to Water Companies

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: Darrah Morgan

Utility Contact 2: Jeanette Melgar

Phone: (626) 302-2086

Phone 2: (626) 302-4039

Email: advicetariffmanager@sce.com

Email 2: advicetariffmanager@sce.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 PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS**

Advice Letter Cover Sheet

Rule 6
Rule 11
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APPROVED

WITHDRAWN

REJECTED

Signature: _____

Comments: _____

Date: _____

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Revised 1179-W Revised 1180-W	Rules 11 Rules 11	Revised 503-W Revised 504-W
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Rule 6

Sheet 1

ESTABLISHMENT AND REESTABLISHMENT OF CREDIT

A. **Establishment of Credit.** Each applicant, before receiving service, will be required to satisfactorily establish his credit, which will be deemed established:

1. If applicant is the owner of the premises to be served or of other real estate within the territory served by SCE; or
2. If applicant makes a cash deposit to secure payment of bills for the service as prescribed in Rule 7, the applicant may enroll in Direct Pay in lieu of a cash deposit. Per D.10-07-048, Direct Pay will be offered to Residential Service customers in lieu of paying a cash deposit beginning October 1, 2010, and will be effective until December 31, 2013, or until the Commission authorizes SCE to discontinue the practice, per D.12-03-054; or
3. If applicant furnishes a guarantor, satisfactory to SCE, to secure payment of bills for the service requested; or
4. If applicant has been a customer of SCE and during the last twelve consecutive months of that prior service has had not more than two past due bills as prescribed in Rule 11-A.

B. **Reestablishment of Credit.**

The following terms and conditions relating to the re-establishment of credit will not apply until further notice to customers who self-certify that they have been financially affected by COVID-19: (N)
|
(N)

1. An applicant who previously has been a customer of SCE and whose water service has been discontinued by SCE during the last twelve months of that prior service because of nonpayment of bills, may be required to reestablish credit by depositing the amount prescribed in Rule 7 for that purpose, and by paying water bills regularly due; except an applicant for domestic service will not be denied service for failure to pay such bills for other classes of service.
2. Customers receiving Non-CARE Residential Service and who are requesting reestablishment of credit after having their service disconnected because of nonpayment of bills or Summary Bill(s) regularly due, may enroll in Direct Pay in lieu of a cash deposit as prescribed in Rule 7. Per D.10-07-048, Direct Pay will be offered to Non-CARE Residential Service customers in lieu of a cash deposit beginning October 1, 2010, and will be effective until December 31, 2013, or until the Commission authorizes SCE to discontinue the practice, per D.12-03-054.
3. A customer who fails to pay bills before they become past due as prescribed in Rule 11-A, and who further fails to pay such bills within 5 days after presentation of a discontinuance of nondomestic service notice for nonpayment of bills, may be required to pay said bills and reestablish his credit by depositing the amount prescribed in Rule 7. This rule will apply regardless of whether or not service has been discontinued for such nonpayment.

(L)

(Continued)

(To be inserted by utility)

Advice 118-W
Decision 19-07-015

Issued by

Carla Peterman
Senior Vice President

(To be inserted by Cal. PUC)

Date Filed Apr 1, 2020
Effective _____
Resolution _____



Rule 6
ESTABLISHMENT AND REESTABLISHMENT OF CREDIT

Sheet 2

(Continued)

B. Reestablishment of Credit.(Continued)

- 4. A customer using other than domestic service may be required to reestablish his credit in case the conditions of service or basis on which credit was originally established have, in the opinion of SCE, materially changed. (L)
- 5. Effective October 1, 2010, until December 31, 2013, or until the Commission authorizes SCE to discontinue the practice, per D. 12-03-054, all domestic CARE customers who have already established credit with SCE are not required to pay additional reestablishment of credit deposits following a disconnection of service. (L)

(To be inserted by utility)
Advice 118-W
Decision 19-07-015

Issued by
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Rule 11
DISCONTINUANCE AND RESTORATION OF SERVICE

Sheet 1

- A. Customer's Request for Service Discontinuance. When a customer desires to terminate his/her responsibility for service, he/she shall give SCE not less than two working days' notice of his/her intention and state the date on which he/she wishes the termination to become effective. A customer may be held responsible for all service furnished at the premises until two working days after receipt of such notice by SCE or until the date of termination specified in the notice, whichever date is later.
- B. Past Due Bills. When bills are rendered monthly or bimonthly, they will be considered past due if not paid within 19 days after date of presentation. When bills are rendered weekly, they will be considered past due if not paid within 4 days after date of presentation.
- C. Nonpayment of Bills.

The following terms and conditions relating to disconnections for nonpayment will not apply until further notice to customers who self-certify that they have been financially affected by COVID-19: (N)
(N)

- 1. When a bill for water service has become past due and a 15-day discontinuance of domestic service notice or a 5-day discontinuance of nondomestic service notice for nonpayment has been issued, service may be discontinued if bill is not paid within the time required by such notice. A customer's service, however, will not be discontinued for nonpayment until the amount of any deposit made to establish credit for that service has been fully absorbed.

Any customer who has initiated a complaint or requested an investigation within 5 days of receiving a contested bill shall not have domestic service to a residential dwelling discontinued for nonpayment during the pendency of an investigation by SCE of such customer dispute or complaint. Such domestic service shall not be discontinued for nonpayment for any customer complying with an amortization agreement entered into with SCE, provided the customer also keeps current his/her account for water service as charges accrue in each subsequent billing period. If a residential customer fails to comply with an amortization agreement, SCE shall not terminate service without giving notice to the customer at least 48 hours prior to termination, of the conditions the customer is required to meet to avoid termination; but, such notice shall not entitle the customer to further investigation by SCE.

- 2. Water service to a domestic customer will not be discontinued for nonpayment when the customer has established to the satisfaction of SCE that:
 - a. Such termination would be especially dangerous to the health of the customer or a full time resident of the customer's household*;

(L)

* Certification from a licensed physician, public health nurse, or a social worker may be required by SCE.

(Continued)

(To be inserted by utility)
Advice 118-W
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Rule 11
DISCONTINUANCE AND RESTORATION OF SERVICE

Sheet 2

(Continued)

C. Nonpayment of Bills. (Continued)

2. (Continued)

- b. The customer or a full time resident of the customer's household is among the elderly (age 62 and over) or handicapped*; and (L)
- c. He or she is temporarily unable to pay for such service in accordance with the provisions of SCE's tariffs; and (L)
- d. The customer is willing to arrange installment payments satisfactory to SCE, including arrangements for prompt payment of subsequent bills.

SCE shall make available to customers, upon request, information regarding agencies and/or organizations that may provide financial assistance.

However, service may be terminated to any customer who does not comply with an installment payment agreement or keep current his account for water service as charges accrue in each subsequent billing period.

- 3. A customer's service may be discontinued for nonpayment of a bill for service previously rendered him at any location served by SCE provided such bill is not paid within 15 days after presentation of a domestic discontinuance of service notice or 5 days after presentation of a nondomestic discontinuance of service notice that present service will be discontinued for nonpayment of such bill for prior service, but in no case will service be discontinued for nonpayment of such bill within 15 days after establishment of service at the new location. However, domestic service will not be discontinued because of nonpayment of bills for other classes of service.
- 4. Where water service is provided to residential occupants in a multi-unit residential structure, mobilehome park, or permanent residential structure in a labor camp, as defined in Section 17008 of the Health and Safety Code, where the owner, manager, or operator is listed by SCE as the customer of record, SCE shall make every good faith effort, when the account is in arrears, to inform the occupants by means of a notice that service will be discontinued.

(Continued)

(To be inserted by utility)

Advice 118-W
 Decision 19-07-015

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Southern California Edison
Rosemead, California

Revised Cal. PUC Sheet No. 1181-W
Cancelling Revised Cal. PUC Sheet No. 1102-W

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