

CALIFORNIA PUBLIC UTILITIES COMMISSION DIVISION OF WATER AND AUDITS

Advice Letter Cover Sheet

Utility Name: Owens Valley Water Company

Dated Mailed to Service List: 6/1/2020

District: N/A

CPUC Utility #: WTD-279

Protest Deadline (20th Day): 6/21/2020

Advice Letter #: 22-W

Review Deadline (30th Day): 7/1/2020

Tier: 1 2 3 Compliance

Requested Effective Date: 6/1/2020

Authorization: D.19-07-015 and D.19-08-025

Rate Impact: n/a

Description: Activation of Emergency Customer Protections and Catastrophic Event Memorandum Account for COVID-19 State of Emergency

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: Lindarea Goldstein

Utility Contact: Lawrence Morales

Phone: (818) 219-1474

Phone: (626) 793-6189

Email: Owensvalleywaterco@gmail.com

Email: lawrence@epwater.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WITHDRAWN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: _____

OWENS VALLEY WATER COMPANY
P.O. BOX 691250 LOS ANGELES, CALIFORNIA 90069 818.219.1474 310.275.3745 (F)
owensvalleywaterco@gmail.com

June 1, 2020

Advice Letter No. 22-W

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Owens Valley Water Company (WTD-279) ("OVWC") hereby submits this Advice Letter as a Tier 1 compliance filing in order to provide required notification to the California Public Utilities Commission ("Commission") Executive Director Stebbins

PURPOSE

The purpose of this Advice Letter filing is to provide notification to the Commission that OVWC is activating its Catastrophic Event Memorandum Account ("CEMA") and implementing emergency customer protections as a result of a State of Emergency being declared for a recent public health emergency. This notification is being provided in accordance with Commission orders in Decisions ("D.") 19-07-015 and D.19-08-025 and in accordance with Commission Executive Director Alice Stebbins' direction in a letter dated March 26, 2020 (the "Letter").

BACKGROUND

In December 2019, a novel (new) coronavirus known as SARS-Co-V-2 ("Covid-19") was first detected in Wuhan, China, subsequently resulting in a global outbreak of the virus. On January 31, 2020, the Secretary of Health and Human Services declared a public health emergency in response to COVID-19. On March 4, 2020, the Governor of the State of California proclaimed a State of Emergency to exist due to the COVID-19 outbreak and on March 13, 2020, the President of the United States proclaimed that the COVID-19 outbreak in the United States constitutes a National Emergency.

COMPLIANCE

The Letter states that the Commission "expect(s) the utilities and service providers subject to D. 19-07-015 and D. 19-08-025 to extend the same applicable customer protections directed in D. 19-07-015 and D. 19-08-25 to customers in response to the declared state of emergency due to the spread of COVID-19. We also expect the utilities and service providers to report to the CPUC on all customer protection measures they implement in response to COVID-19 as soon as they are implemented." The Letter advises that these customer protections should be retroactively applied to March 4, 2020.

In D. 19-07-015, the Commission established emergency customer relief protections that apply when the California Governor's Office or the President of the United State issues a state of emergency.

CATASTROPHIC EVENT MEMORANDUM ACCOUNT ACTIVATION

CWC has activated its CEMA to track the recorded costs associated with the recent COVID-19 declared state of emergency. In accordance with Cal. Pub. Util. Code §454.9 and Ordering Paragraph 10 of D. 19-07-015, these costs shall include, but are not limited to:

1. Restoring utility service to the utility customers;
2. Repairing, replacing, or restoring damaged utility facilities;
3. Complying with government agency orders resulting from declared disasters; and
4. Costs associated with implementing emergency customer protections, including costs of communications not already reflected in rates and waived or deferred charges.

Pursuant to the Letter, costs recorded into the CEMA begin March 4, 2020, the date the Governor declared a state of emergency. As described in CWC's Preliminary Statement, the utility will inform the Executive Director by letter within 30 days after the catastrophic event that CWC has started recording costs in the CEMA. Copies of the letter shall be provided to the Water Division and the Director of the Office of California Public Ratepayers Advocates. Due to the uncertain and widespread natures of the COVID-19 pandemic, CWC cannot estimate what the extraordinary costs will be incurred at this time, but currently anticipates that costs will be related to employee safeguards, operational adjustments for business continuity, customer protections and relief, and additional required communications and outreach. Further, CWC shall make insurance claims on covered costs and expenses related to the disaster and credit payments to the CEMA.

ELIGIBILITY REQUIREMENTS FOR EMERGENCY CUSTOMER PROTECTIONS

Through this advice letter, OVWC 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.

OVWC customers who self-certify that they are experiencing economic hardship due to COVID-19 will have their accounts identified or flagged in OVWC's customer service billing system as eligible for billing and credit protections as extended by the Commission. OVWC will provide the following:

1. Implement emergency customer protections, including moratorium on service disconnections for customers who are economically affected.
2. Waive deposit requirements and late fees.
3. Implement flexible payment plans by collaborating with affected customers and customers with arrearages to establish payment arrangements based on individual customer needs.
4. Customer protections will be retroactive effective March 4, 2020.

TIER DESIGNATION AND EFFECTIVE DATE

This advice letter is submitted with a Tier 1 designation pursuant to Ordering Paragraph 9 and 10 of D. 19-07-015 and General Order 96-B. This Advice Letter requests an effective date of March 4, 2020, in compliance with Executive Director Stebbins' directive applying customer protections retroactively to the start date of the Governor of California's emergency proclamation.

NOTICE

This is a Tier 1 compliance filing consistent with Water Industry Rule 7.3.1(3) of General Order 96-B. Water Industry Rule 3.2 of General Order 96-B indicates that this kind of Tier 1 compliance filing does not require customer notice. In accordance with General Rule 4.3 of General Order 96-B, a copy of this advice letter is being provided to the entities listed on the attached service list.

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 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 vial email (or postal mail) within 20 days of the date of the advice letter is filed.

The address for mailing or delivering a response or protest is:

Email Address:
Water_Division@cpuc.ca.gov

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

On the same day the response or protest is submitted to the Water Division, the respondent or protestant shall send a copy of the protest to OVWC at:

Email Address:
Owensvalleywaterco@gmail.com

Mailing Address:
P.O. Box 691250
Los Angeles, CA 90069

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June 1, 2020
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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. Any reply must be received by the Water Division within five business days after the end of the protest period and shall be served on the same day on each person who file the protest or response to the advice letter.

Should there be any questions or concerns, please contact OVWC's office at (818) 219-1474

Best Regards,

OWENS VALLEY WATER COMPANY

A handwritten signature in black ink, appearing to read "Lindarea Goldstein", is written over a solid horizontal line. The signature is stylized and cursive.

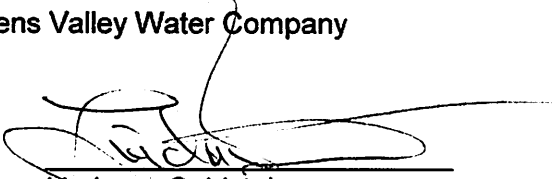
Lindarea Goldstein
Owner

Certificate of Service

I hereby certify that I have this day served a copy of Advice Letter 22-W on the parties listed on the following Distribution List by mailing a properly addressed copy by first class mail with postage prepaid or by email to those marked with an asterisk (*).

Owens Valley Water Company

By:

A handwritten signature in black ink, appearing to read 'Lindarea Goldstein', written over a horizontal line. A long, thin, curved line extends from the top of the signature upwards and to the right, crossing over the word 'Company' in the line above.

Lindarea Goldstein
Owner

Owens Valley Water Company

P.O. Box 691250
Los Angeles, California 90069
Telephone: (818) 219-1474
Email: Owensvalleywaterco@gmail.com

SERVICE LIST

Inyo County Water Dept.
135 s. Jackson St. ✕
Independence, CA 93526

City of Bishop Water Dept.
377 West Line St. ✕
Bishop, CA 93514

Meadow Creek Mutual Water
Attn: Mr. Andy Holmes ✕
2919 Cheyenne Dr.
Bishop, CA 93514

Glenwood Mobile Estates
Attn: Ms. Maricela Garcia
1349 Glenwood Ln ✕
Bishop, CA 93514

City of Los Angeles
Dept. of Water and Power ✕
300 Mandich
Bishop, CA 93514

California Public Utilities Commission
Water Division
505 Van Ness Avenue ✕
San Francisco, CA 94102

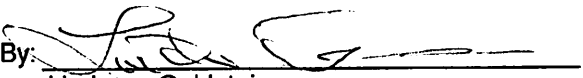
E. Viray ✕
eviray88@gmail.com

Lawrence Morales ✕
lawrence@epwater.com

I hereby certify that the above service list has been served a copy of AL 22 on June 1, 2020.

Executed in Los Angeles, California on June 1, 2020.

Owens Valley Water Company

By: 
Lindarea Goldstein
Owner