

WARRING WATER SERVICE, INC.

P.O. Box 189 Piru, CA 93040, 805-524-3267, danvlboon@sbcglobal.net

April 8, 2020

Advice Letter No. 66-W

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Rolling Green Utilities, Inc. (WWS) hereby transmits for filing a PDF copy of this advice letter 66-W:

REQUEST\PURPOSE

By AL 66-W, WWS 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 WWS CEMA on the effective date of Advice Letter 66-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, WWS 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, WWS 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.

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

1. Suspend disconnections for affected customers

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

WARRING WATER SERVICE, INC.

P.O. Box 189 Piru, CA 93040, 805-524-3267, danvlboon@sbcglobal.net

2. Waive deposit requirements and late fees

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

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

WARRING WATER SERVICE, INC.

P.O. Box 189 Piru, CA 93040, 805-524-3267, danvlboon@sbcglobal.net

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 relitigating 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 96602

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 Gerry LaBudde at: Warring Water Service, Inc.

Email Address:

Water.warring@sbcglobal.net

Mailing Address:

Warring Water Service, Inc.
P.O. Box 189
Piru, CA 93040

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

WARRING WATER SERVICE, INC.

P.O. Box 189 Piru, CA 93040, 805-524-3267, danvlboon@sbcglobal.net

SERVICE LIST

Recipient 1 County of Ventura Special Districts
Attn: Eric Keller
6767 Spring Road
Moorpark, CA 93021

Recipient 2 California American Water
Thomas Brunet
thomas.brunet@amwater.com

Recipient 3 Rancho Temescal
Tim Cohen
tcohen@ranchotemescal.com

I hereby certify that the above service list has been served a copy of AL 66-W on April 8, 2020.

Executed in Santa Paula, California on the April 8, 2020.

Warring Water Service, Inc.

By: /s/Frank Brommenschenkel
Glen Pace
President

Enclosures