

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

Advice Letter Cover Sheet

Utility Name: East Pasadena Water Company **Date Mailed to Service List:** 5/27/21
District: n/a
CPUC Utility #: WTB 331 **Protest Deadline (20th Day):** 6/16/21
Advice Letter #: 115-A **Review Deadline (30th Day):** 6/26/21
Tier 1 2 3 Compliance **Requested Effective Date:** ASAP
Authorization M-4849
Description: Per M-4849, Compliance Filing of the **Rate Impact:** \$-0-
Transition Plan for the expiration of Emergency 0.00%
Customer Protections on June 30, 2021.

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.

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DWA USE ONLY

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

APPROVED

Signature: _____

Date: _____

WITHDRAWN

Comments: _____

REJECTED

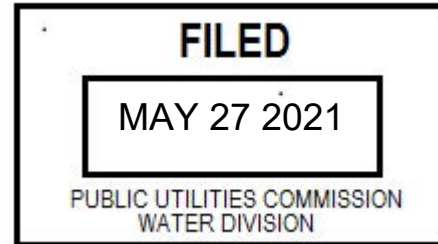
EAST PASADENA WATER COMPANY

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SUPPLEMENT

May 25, 2021

ADVICE LETTER NO. 115-A



TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Summary

East Pasadena Water Company (WTB-331) ("EPWC") hereby submits this Tier 2 advice letter in compliance with Resolution (Res.) M-4849, which was adopted by the California Public Utilities Commission ("CPUC" or "Commission") at its February 11, 2021 voting meeting and issued the next day. In particular, this advice letter complies with Res. M-4849's extension of Emergency Customer Protections to June 30, 2021.

On April 29, 2021, The CPUC suspended EPWC's AL 115 and requested detailed information about expected costs of Transition Plan's ME&O efforts and an estimate of any incremental costs of ME&O efforts beyond current budgets. EPWC has incorporated the requested information into the Transition Plan for the Expiration of Emergency Customer Protections.

Background

On April 1, 2020, EPWC filed its AL 110 responding to Alice Stebbins, the Executive Director of the Commissions letter dated March 17, 2020 regarding "applicable customer protections" from D.19-07-015 in response to the COVID-19 State of Emergency and notifying the Commission that, beginning March 4, 2020, EPWC is recording all costs related to the customer protections and notifications identified in D.19-07-015 resulting from COVID-19 State of Emergency proclamation in its CEMA, including but not limited to, lost revenues due to customers' inability to pay for their water service as a result of the COVID-19 State of Emergency, as well as all other costs related to the COVID-19 State of Emergency, including butnot limited to customer notifications, as well as additional supplies and equipment necessary to comply with all COVID-19 requirements, measures and directives.

On April 16, 2020, Commission Resolution M-4842 ordered electric, gas, communications and Class A & B water and sewer corporations to implement a number of emergency customer protections and report their compliance to the Commission.

Transition Plan for the Expiration of Emergency Customer Protections

As of the date of this Tier 2 advice letter filing, EPWC has experienced no "loss or disruption of the delivery or receipt of utility service" nor has the COVID-19 emergency "resulted in the degradation of the quality of utility service" (citations from Ordering Paragraph Number 9 of D.19-07-015).

EPWC, via Advice Letter No. 110 (AL 110), applied the applicable customer protection measures adopted

in D.19-07-015 and D.19-08-025 with an effective date of March 4, 2020. Further, EPWC will demonstrate compliance with the requirements of Resolution M-4849's Emergency Customer Protections for Water Customers listed on page 7 of Res. M-4849 in its itemized responses below the italicized list of those protections:

- (1) activation of their Catastrophic Event Memorandum Account (CEMA) effective to the date of the Governor's declaration of a state of emergency - March 4, 2020;*
- (2) make insurance claims on all costs and expenses incurred as a result of the pandemic, and credit insurance payments to their CEMA;*
- (3) work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment;*
- (4) waive reconnection or facilities fees for customers and suspend deposits for customers who must reconnect to the system;*
- (5) provide reasonable payment options to customers;*
- (6) waive bills for victims who lost their homes or if their homes are rendered uninhabitable; and*
- (7) authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.*

(1) EPWC activated its CEMA effective March 1, 2020 by letter dated April 1, 2020 to the Executive Director of the Commission and clarified such activation in the Utility's AL 110 filed with the Commission on April 1, 2020. EPWC is recording in its CEMA all costs related to the customer protections and notifications identified in D.19-07-015 resulting from COVID-19 State of Emergency proclamation, including but not limited to, lost revenues due to customers' inability to pay for their water service as a result of the COVID-19 State of Emergency, as well as all other costs related to the COVID-19 State of Emergency, including but not limited to customer notifications, as well as additional supplies and equipment necessary to comply with all COVID-19 requirements, measures and directives, compliance with governmental authorities, and expenses related to the ongoing operation and maintenance of the water system in order to maintain a continuous supply of safe and potable water to customers, as well as other potential and unforeseen (at this time) impacts COVID-19 may have on EPWC. EPWC's CEMA remains active.

(2) EPWC has not had any insurable losses to make claims on at this time. However, in the event an insurable cost or expense is incurred as a result of the pandemic, EPWC will make an insurance claim and credit any applicable insurance payments to its CEMA.

(3) As evidenced by AL's 110 and EPWC's compliance with Governor Newsom's Executive Order N-42-20, EPWC continues to work cooperatively with affected customers who self-identify to EPWC as being affected by COVID-19, to resolve unpaid bills, provide payment arrangements to customers based on specific needs, and to minimize disconnections for non-payment during the pendency of the COVID-19 State of Emergency (as stated below, EPWC actually suspended disconnections of service due to nonpayment, which is consistent with the Governor's Executive Order N-42-20). In particular, EPWC has communicated the Emergency Customer Protections to its customers via bill inserts and direct mail. In addition, EPWC has sent additional notices to customers who are past due inviting them to contact EPWC to make payment arrangements based on their specific need. These notices have reminded customers that Governor Newsom's Executive Order N-42-20 states unequivocally that the unpaid water bills during the pandemic emergency will be due when the emergency is over and that water utilities, such as EPWC, will be entitled to collect such unpaid amounts.

With respect to disconnections, on March 12, 2020, EPWC suspended all disconnection for nonpayment of bills. At that time, there were no EPWC customers whose service had been disconnected for nonpayment. There have been no disconnections for nonpayment during the COVID-19 pandemic emergency. All customers have received and continue to receive water service during the state of emergency whether or not they have paid for the water service they have consumed and purchased from EPWC.

(4) EPWC confirms that it has not, and will not, charge customer reconnection or facility fees for

customers, and waived deposits for customers who must reconnect to the system, who self- identify to EPWC as affected by COVID-19 during the pendency of the COVID-19 pandemic emergency.

(5) EPWC will continue to work with all customers to provide reasonable payment options to its customers. The terms and conditions of such payment options are being tailored to individual customer's needs (and are as authorized pursuant to the Utility's Rule No. 11), which EPWC believes is a reasonable and flexible method of offering such payment options. EPWC confirms that it will continue to provide reasonable payment options to its customers throughout the COVID-19 pandemic emergency as required by Senate Bill 998 and EPWC's Rule No. 11.

In response to Resolutions M-4842 and M-4849's Emergency Customer Protections for Water Customers item numbers 6 and 7 as listed above, EPWC believes that these items are clearly related to emergencies in which real property is damaged or destroyed, i.e., wildfires, earthquakes, floods, or other natural disasters, and further believes that the current emergency, a pandemic viral situation, has not and will not result in the damage or destruction of real property. Therefore, EPWC states as follows in response to these line items:

(6) If residential customers lose their homes or their homes are rendered uninhabitable by the COVID-19 pandemic emergency, EPWC will waive bills for those customers as of the date their home is either lost or rendered uninhabitable during the pendency of the COVID-19 State of Emergency or until the home is once again habitable, whichever comes first. To date, EPWC is not aware of any residential customers that have lost their homes or have had their homes rendered uninhabitable during the COVID-19 pandemic emergency.

(7) Should a governmental agency declare a residence uninhabitable due to the COVID-19 State of Emergency, EPWC would authorize a pro rata waiver of any fixed element of a water bill for the period of time the home is deemed uninhabitable, even if the reason for it being uninhabitable is not for loss of water service. To date, EPWC is not aware of any residential customers that have lost their homes or have had their homes rendered uninhabitable during the COVID-19 pandemic emergency.

EPWC confirms that it shall continue to provide customer protection measures for residential and small business customers adopted in D.19-07-015 and D.19-08-025 (as applicable), as ordered by Res. M-4842, through June 30, 2021 as required by Ordering Paragraph 1 of Res. M-4849. EPWC also confirms that it will continue its ongoing community (customer) awareness and outreach activities, as required under D.19-07-015 and D.19-08-025 (as applicable), as ordered in Res. 4842, and as required by Ordering Paragraph 4 of Res. M-4849.

This filing is made under the provisions of General Order No. 96-B and as directed by Resolution M-4842.

This filing will not cause withdrawal of service nor conflict with any other schedule or rule.

Incorporation of Low Income Oversight Board (LIOB) Input into EPWC's Resolution M-4849 Transition Plan

Attached as **Exhibit A**, Please find EPWC's **Transition Plan for Expiration of the Emergency Customer Protections** (Transition Plan) in conformance with Ordering Paragraph 5 of Res. M-4849. This Plan incorporates all of the elements of a transition plan required by Res. M-4849. In addition, in compliance with Ordering Paragraph 6 of Res. M-4849, on March 3, 2021, EPWC submitted its draft Transition Plan Advice Letter to CPUC staff (Gillian.Weaver@cpuc.ca.gov), who was directed to share it with the LIOB.

On March 24, 2021 the LIOB provided all IOUs subject to Res. M-4849 with eight recommendations to incorporate into their draft Transition Plans. Of the eight recommendations provided by LIOB, three were applicable to water utilities. EPWC, a small Class B water utility, has determined that only two of LIOB's recommendations can be implemented with a reasonable degree of effectiveness. Those recommendations have been incorporated into its Transition Plan to implement when feasible.

The LIOB recommends that all transition plans include a 7-day or 168 hour-look-ahead period, where if temperatures are forecasted to be above 100 degrees or below 32 degrees, the household shall not be disconnected. The LIOB requests this to be in effect through December 31, 2021. EPWC has incorporated a 7-day look-ahead period and will not disconnect if temperatures exceed 100 degrees on the day of disconnection.

The LIOB recommends the Commission to direct IOUs transition plans to require separate and distinct marketing, education, and outreach plans for targeting hard-to-reach customers, including those residing on tribal lands and within communities designated as low-income, disadvantaged, and/or underserved. Plans should disclose geographical detail to identify the areas the specific targeted outreach and marketing plans will encompass. The LIOB further recommends the Commission direct IOUs to develop reporting mechanisms to track expenditures and outcome results from partnerships with community-based organizations and human services agencies specifically targeting hard-to-reach customers and underserved communities.

EPW's draft transition plan includes a comprehensive ME&O Strategy containing a targeted outreach section to those customers most vulnerable to disconnection for non-payment. It includes direct phone calls, emails, written materials in multiple languages and direct customer contact. EPWC will also include information on the Department of Housing and Community Development's Emergency Rental Assistance Program.

EPWC estimates that its enhanced ME&O efforts will incur costs above and beyond what EPWC has normally incurred for customer outreach prior to Covid-19. Mailing costs associated with inserts of 8.5" x 11" bond paper for 3,400 residential and business customers will cost \$600 each mailing. We anticipate three separate mailings in 2021.

Tier Designation and Requested Effective Date

This advice letter is submitted with a Tier 2 designation pursuant to Ordering Paragraph 2 of Resolution M-4849 to demonstrate compliance with the extension of Emergency Customer Protections to June 30, 2021. This is a Tier 2 advice letter pursuant to General Order 96-B and Water Industry Rule 7.3.1(3) (Compliance with a mandatory statute, decision, or resolution).

EPWC respectfully requests the effective date to be as soon as possible for Advice Letter No. 115-A, in compliance with Ordering Paragraph 2 of Resolution M-4849.

Notice

This is a Tier 2 compliance filing consistent with Ordering Paragraph 2 of Resolution M-4849. Water Industry Rule 3.2 of General Order 96-B indicates that this kind of compliance filing does not require customer notice. In accordance with General Rule 4.3 and 7.2 of General Order 96- B, a copy of this advice letter is being mailed to all parties listed on EPWC's service list as well as the service lists for R.17-06-024 and R.18-03-011.

Protests and Responses:

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 shall provide citations or proofs where available to allow staff to properly consider the protest.

A response or protest must be made in writing or by electronic mail and must be received by the Water Division within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3rd floor
California Public Utilities Commission 505
Van Ness Avenue
San Francisco, CA 94102
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 by mail or e-mail to us, addressed to:

Recipients:

Email:

Mailing Address:

Lawrence M. Morales lawrence@epwater.com
President

Attn: Lawrence M. Morales
East Pasadena Water Company
3725 East Mountain View Avenue
Pasadena, CA 91104

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. Each reply must be received by the Division of Water and Audits within five business days after the end of the protest period, and shall be served on the same day to the person who filed the protest or response.

East Pasadena Water Company

By: /s/ Lawrence M. Morales
Lawrence M. Morales
President

**CLASS B: RESOLUTION M-4849
EAST PASADENA WATER COMPANY TRANSITION PLAN OUTLINE**

I. TRANSITION PLAN INTRODUCTION

East Pasadena Water Company (EPWC or the water utility) has been asked to develop a Transition Plan for transitioning from the current Emergency Customer Protections Plan and Governor Newsom’s declared State of Emergency on March 4, 2020 as the result of the COVID-19 pandemic. The Governor imposed a moratorium on water service disconnections for non-payment and this plan provides a guide for customers to pay past due amounts that have been accumulated and avoid service disconnections for nonpayment of their water bill. Throughout the COVID-19 pandemic, EPWC has worked cooperatively with its customers to resolve unpaid bills by arranging for full or partial payments or to make arrangements for payment plans that are tailored directly to the customer’s needs. EPWC plans to continue this cooperative effort during this transition.

A. Transition Plan Objectives

- Implement measures to attempt to reduce customers’ anxiety about protections ending
- Effectively ease customers through a transition from COVID protections by implementing programs or initiatives, and enrolling customers in these programs/initiatives, to continue to assist them in bill management
- Proactively communicate with customers to inform them of changes in protections and help enroll them in programs to manage their bills

B. Transition Plan Guiding Principles

- Easy and effortless customer experience
- Easy to operationalize
- Focus on affordability
- Engage stakeholders and customers

II. ACTIVITIES TIMELINE

A. Summary of General Steps Mandated under Resolution M-4849

- **February 11, 2021** – Resolution M-4849 adopted by the Commission
- **February 21, 2021** – EPWC filed Tier 1 Advice Letter demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021
- **March 1, 2021** – EPWC submitted draft Transition Plan Advice Letter to the Commission

- **March 11, 2021** – LIOB discusses EPWC draft Transition Plans during its quarterly meeting
- **April 1, 2021** –EPWC will submit final Transition Plan Advice Letter that incorporate feedback from LIOB and the Commission’s Water Division staff.
- **May 26, 2021**-EPWC submits supplemental advice letter 115-A and begins implementing the ME&O Strategy activities outlined in Section III below.

B. Resumption of Disconnections for Non-Payment

- Separately from the existing customer protections mandated by the Commission, water utilities are also subject to an on-going moratorium on water service disconnections for non-payment imposed under Executive Order N-42-20. However, it is uncertain when the end-date for the moratorium will be issued and it is unclear how much notice water utilities may receive in advance of such a date. Therefore, the timeline for resumption of disconnections for non-payment set forth below is set around a “Disconnection Policy Resumption Date” on a future date to be determined by each individual water utility, occurring at the soonest on the latter of July 1, 2021 or the EO Moratorium Lifting Date.
- **60 days prior to Disconnection Policy Resumption Date** – The water utility will begin sending out notices to customers informing them that the water utility will resume applying standard disconnection procedures under its tariffs on a Disconnection Policy Resumption Date. The standard disconnection procedures are based on the timeline and requirements established by the Legislature under Senate Bill (“SB”) 998 (2018 Water Shutoff Protection Act).
- **Disconnection Policy Resumption Date** – The water utility will resume standard disconnection procedures under the timeline established under SB 998 and will begin counting the 60-day period prohibiting disconnections mandated under Health & Safety Code § 116908(a)(1)(A) for bills that are delinquent (past the due date) as of the Disconnection Policy Resumption Date. The water utility will individually reach out to each customer that has a delinquent bill as of the Disconnection Policy Resumption Date and will offer an opportunity to participate in an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment (the choice of which will be appropriate determined by the water utility based upon the specific circumstances of the individual customer). If a customer is engaged in one of those types of payment assistance plans and is making timely payments under that plan, they will not be disconnected.
- **60 days after Disconnection Policy Resumption Date** – The water utility may begin disconnecting customers for non-payment pursuant to the rules and procedures set forth under SB 998 and the applicable tariff rules. Prior to any disconnection for non-payment, the water utility will provide advance noticing

required by SB 998 as follows below. In addition, each notice provided will mention the alternative payment arrangements made available as part of the transition plan.

- **At Least 7 Business Days Before Disconnection** – No less than seven business days before discontinuation of residential service for nonpayment, the water utility shall contact the customer named on the account by telephone or written notice pursuant to Health & Safety Code § 116908(a)(1)(A). EPWC has incorporated a 7-day look-ahead period and will not disconnect if temperatures exceed 100 degrees on the day of disconnection.
- **At Least 10 Calendar Days Before Disconnection** – For residential occupants of individually metered multi-unit complexes who are not the customer of record, the water utility will send written notice pursuant to Health & Safety Code § 116916(b) at least 10 calendar days prior to any possible disconnection.
- **At Least 7 Calendar Days Before Disconnection** – For detached single-family dwelling, the water utility will send written notice of termination pursuant to Health & Safety Code § 116916(f)(1) at least 7 calendar days prior to any possible disconnection.

If the Disconnection Policy Resumption Date is July 1, 2021, at the earliest, EPWC will use the following dates for applying standard late charges but will be flexible to use any date based on the ordered date ending the Disconnection Moratorium.

- **June 1, 2021** – The water utility will begin sending out written notices to all customers informing them that the water utility may resume applying the standard late payment, reconnection or other customer fee procedures under its tariffs on July 1, 2021.
- **July 1, 2021** – Water utility may resume applying standard late payment, reconnection, or other customer fees to customer accounts.

III. MARKETING, EDUCATION, AND OUTREACH STRATEGY

Resolution M-4849 provides that “The IOUs shall include a coordinated, effective, and efficient strategy for their marketing, education, and outreach plan to engage and enroll customers in new bill management programs, to inform customers already enrolled in programs about changes due to the Emergency Customer Protections being no longer in effect after June 30, 2021 (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor’s Executive Order N-42-20), and to inform customers of the extension of the customer protections, where necessary.”

The following Marketing, Education, and Outreach (“ME&O”) Strategy supports the Transition Plan in effectively easing customers through a transition off of the Emergency Customer

Protections (and the future expiration of the disconnection moratorium in the Governor’s Executive Order N-42-20) by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled. The Strategy was developed with a customer-impact lens and is part of a coordinated and effective marketing, education and outreach program. EPWC will also include information on the Department of Housing and Community Development’s Emergency Rental Assistance Program.

While Resolution M-4849 describes some ME&O activities that relate specifically to customers enrolled in income-qualified customer assistance programs (including such programs implemented by the Class A water utilities), none of the Class B water utilities are currently authorized to implement such customer assistance programs under their current tariffs. Therefore, those examples provided in Resolution M-4849 are not applicable to Class B water utilities and accordingly will not be included in their draft transition plan advice letters.

A. Target Audiences

- The ME&O Strategy is intended to reach customers at large, with specifically targeted categories of customers as follows:
 - Customers enrolled in bill management programs
 - Customers with past-due balances on their accounts
 - Customers that may qualify for disconnection preventions due to medical needs pursuant to SB 998

B. ME&O Activities for All Customers

- EPWC will leverage ongoing communications channels to educate and engage customers about the June 30, 2021 expiration of Emergency Customer Protections enacted during the COVID-19 crisis; programs available to help customers maintain service; water efficiency and rebate programs that can help customers use less water, and therefore reduce their water bill; and where necessary, information about the extension of customer protections.
- Tools for implementation statewide, across all regulated water utilities, include bill insert and/or message, customer service talking points and training, phone message prompt (i.e. during welcome/on-hold messages), and office signage (when reopened to the public).

C. Targeted Outreach

- In addition, EPWC will undertake proactive outreach to targeted customers. Tools may include the following, as appropriate:
 - Phone calls (automated or manual) targeted at specific audiences
 - Emails or direct mail targeted at specific audiences
 - Direct contact at customer residence (i.e. door tags)
 - Materials in multiple languages (according to customer demographics)

- Targeted outreach will convey the following information, as appropriate:
 - Payment plans and options available to help customers maintain service or manage arrearages
 - Application of late-payment, reconnection, and other fees to a customer
 - Noticing of risk of disconnection
 - Information about qualifying for disconnection preventions due to medical needs pursuant to SB 998

D. Partnerships

- **Partnership Activities By Individual Water Utilities** – EPWC will seek to identify and partner with community-based and other organizations that regularly interact with targeted audiences to expand our outreach program. This includes, as directed in Resolution M-4849, seeking to partner with the California Department of Community Services and Development and their local service providers to leverage their customer interactions for expanding outreach efforts on bill management programs.

E. Incremental ME&O Costs

- Resolution M-4849 provides that “If an IOU estimates that it cannot both comply with this Resolution and maintain compliance with existing Decision mandates leveraging only existing authorized budgets, it shall note in its Advice Letter the cost estimate, with details of the incremental new activity, and use the memorandum account to record and track incremental costs associated with transition plan implementation.”
- To the extent that EPWC is required to perform additional customer outreach, EPWC will submit a cost estimate and details of the new incremental activities. At this time, EPWC does not have an estimate for costs of this Transition Plan.

IV. COMPLIANCE AND SAFETY

Resolution M-4849 provides that “Each IOU must explain in their Transition Plan Advice Letter how the transition plan maintains alignment with program enrollment targets, program eligibility requirements, and customer protections in effect outside Emergency Customer Protections (e.g., bans on requirements that energy customers pay a deposit to enroll in 12-month payment plan) established by Commission Decisions for relevant programs as outlined in Section 1, Activities Timeline.”

A. Alignment with Program Enrollment Targets and Requirements

- On March 27, 2020, EPWC notified then-Commission Executive Director Alice Stebbins, in writing, that EPWC had activated its CEMA, and applicable provisions of the Emergency Customer Protections required by the Commission. On February 21, 2021, EPWC filed Advice Letter 113 in compliance with Resolution M-4849, extending the Emergency Customer Protections through June 30, 2021. With these filings, EPWC has complied with Commission Decision directives pertaining to pandemic emergency customer protections.
- EPWC has complied with the moratorium on water service disconnections for nonpayment ordered by Executive Order N-42-20 as well. There have been no water service disconnections for nonpayment by EPWC since before the declaration of the pandemic State of Emergency.
- Based on data through February 2021, single-family residential customers with past due balances on their accounts of 90 days or more facing water service disconnections- EPWC estimates that between 90 and 120 days the percentage of customers is less than 1% (4 out of 2,750 customers) and over 120 days the percentage of customers is 2.5% (69 out of 2,750 customers)

B. Ensuring that Activities are Safe and Consistent with All Appropriate State and Local Health Orders

- EPWC has complied and adhered to all State and local health orders to ensure the safety of our employees and customers.

V. PROGRESS TRACKING AND REPORTING

Resolution M-4849 provides that “IOUs must include a plan for reporting progress on activities in the timeline, and present metrics they will track and report to monitor success in achieving the goal of effectively easing customers through a transition off of Emergency Customer Protections (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor’s Executive Order N-42-20) by enrolling customers in programs to manage their utility bills and informing applicable customers of the changes to programs in which they are already enrolled. Reporting frequency shall be monthly and the first report shall include baseline data associated with progress metrics.”

While Resolution M-4849 provides examples of progress tracking and reporting metrics aimed at measuring trends in the number of customers enrolled in income-qualified customer assistance programs (including such programs implemented by the Class A water utilities), none of the Class B water utilities are currently authorized to implement such customer assistance programs under their current tariffs. Therefore, those examples provided in Resolution M-4849 are not

applicable to Class B water utilities and accordingly will not be included in their draft transition plan advice letters.

A. Background and Protocols for Progress Tracking and Reporting

- EPWC will track and report such information on a monthly basis for 12 months following the end of the Commission-mandated Emergency Customer Protections (i.e., through June 30, 2022). To the extent feasible and available, water utilities will report to the Water Division each metric on a monthly basis going back to February 2020 before the Emergency Customer Protections were implemented.

B. Metrics to Track Enrollments of Impacted Customers in New Payment Programs

- EPWC will provide the following metrics to track enrollments of impacted customers in new payment programs.
 - Number and percentage of customers enrolled in alternative payment arrangements (defined as enrollment in an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment).
 - Number and percentage of customers that are disconnected.
 - Change in arrearage amounts.

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