

CALIFORNIA UTILITIES SERVICE, INC.

A California Corporation

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June 16, 2021

ADVICE LETTER NO. 82 CALIFORNIA UTILITIES SERVICE, INC (U 418-S)

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

California Utilities Service, Inc. ("CUS") hereby transmits for filing its informational Advice Letter No. 82 ("AL 82").

Summary

CUS, Utility #SWR-418, a Class C sewer system company, hereby transmits this Tier 1 advice letter filing in compliance with California Public Utilities Commission (CPUC) letter dated June 16, 2021 from Terence Shia, Director of Water Division and California Governor Newsom's Executive Order N-08-21 signed on June 11, 2021, both extending Emergency Customer Protections to September 30, 2021 and keep the associated Catastrophic Event Memorandum Account (CEMA - COVID -19) open.

Background and Compliance with Executive Director Stebbin's Instructions

On March 26, 2020, the previous Executive Director issued a letter to all Class C, D Water and Sewer utilities stating that the Commission expects the utilities to extend customer protections to customers affected by the COVID-19 pandemic. These Emergency Customer Protections apply to customers for up to one year from April 16, 2020. On March 24, 2021, CUS filed Advice Letter No. 80 (AL 80) specifying actions taken by CUS related to the COVID-19 State of Emergency and extending the Emergency Customer Protections through June 30, 2021. AL 80 was approved on April 2, 2021.

Actions Taken by CUS

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

Also, on March 20, 2020, CUS provided a letter to Bruce DeBerry, CPUC Water Division Manager responding to the Water Division's March 17, 2020 email and identifying CUS's "COVID-19 Measures and Consumer Protections". That letter described the applicable consumer protections and actions that CUS had already voluntarily implemented in response to the Governor's and Presidents declarations of the COVID-19 State of Emergency. In summary, CUS has/is:

- 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 sewer bills.
- Offered extended payment plan options to customers.
- Working cooperatively with customers to resolve unpaid bills.
- Expedited start/end of service requests.
- Waived the deposit requirements for customers directly affected by the COVID-19 health crisis.
- Notified customers via bill insert / direct mailer to contact CUS in the event that they are having difficulty paying their sewer bill due to financial hardships that they may be experiencing as a result of the COVID-19 health crisis.
- Notified local governments and local elected officials of CUS's actions.
- Issuing press release(s) about our actions.

On March 26, 2020 Alice Stebbins, CPUC Executive Director, sent a letter to all Class C and D Water and Sewer Utilities requesting *"information on the customer protections measures taken by Class C and D Water and Sewer Utilities to protect customers by continuing water and services to residential customers who are unable to pay their bills because of the coronavirus health crisis."*

On April 1, 2020, CUS responded to the March 26, 2020 Alice Stebbins letter and provided information regarding the applicable customer protection measures voluntarily taken by CUS thus far to protect customers by continuing sewer service to residential customers who are unable to pay their bills because of the COVID-19 State of Emergency. That letter described additional steps taken by CUS to keep its customers and workforce healthy.

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 May 14, 2020, CUS filed Advice Letter No. 77 (AL 77). With the filing of AL 77, CUS confirmed the actions and implemented applicable customer protections described in the previous letters from CUS to the Commission. Further, CUS affirmed that such applicable customer protections will continue during the pendency of the COVID-19 State of Emergency.

Extension of Emergency Customer Protections

On March 24, 2021, CUS filed AL 80 extending the Emergency Customer Protections to June 30, 2021 and will keep the Catastrophic Event Memorandum Account (CEMA - COVID -19) open until at least June 30, 2021.

CUS confirms that it shall continue to provide customer protection measures for residential and small business customers (specifically stated in AL 77 and confirmed and extended in AL 80) **through September 30, 2021** pursuant to a CPUC letter dated June 16, 2021 from Terence Shia, Director of Water Division, and consistent with the extension granted by California Governor Newsom's Executive Order N-08-21 dated June 11, 2021. Accordingly, CUS confirms that it will continue its ongoing community (customer) awareness and outreach activities through September 30, 2021. Also further confirms that it will keep all related memorandum accounts open.

Effect on Service

This filing is made under the provisions of General Order No. 96-B and as directed by the CPUC letter dated June 16, 2021 from Terence Shia, Director of Water Division directing the water and sewer utilities to file a Tier 1 Advice Letter extending the mandated Emergency Customer Protections through September 30, 2021.

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

Tier Designation and Requested Effective Date

This filing is an information-only Tier 1 Advice Letter pursuant to General Order 96-B General Rules 3.9, 6.1, 6.2, and in compliance with the CPUC letter dated June 16, 2021 from Terence Shia, Director of Water Division. CUS respectfully requests that the effective date of this informational advice letter filing be June 16, 2021, as directed by CPUC letter dated June 16, 2021 from Terence Shia, Director of Water Division.

Notice

In compliance with Section 4.3 of General Order No. 96-B, a copy of this advice letter has been mailed to all parties listed on the enclosed service list. As this advice letter is for compliance with CPUC letter dated June 16, 2021 from Terence Shia, Director of Water Division, no additional notice to customers is required.

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:

California Utilities Service, Inc.
249 Williams Road
Salinas, CA 93905
Fax: (831) 424-0611

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.

California Utilities Service, Inc.

By: /s/ Thomas R. Adcock
Thomas R. Adcock
President

CALIFORNIA UTILITIES SERVICE, INC.
ADVICE LETTER NO. 82
SERVICE LIST
(AS PER SECTION 7.2 OF GENERAL ORDER NO. 96-B) LIST

Via First Class United States Mail and Via
E-mail:

Bruce DeBerry
Water Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
water_division@cpuc.ca.gov

Via United States Mail, w/out attachments:

California-American Water Company
4701 Beloit Drive
Sacramento, CA 95838-2434

County Clerk
County Administrative Office
168 West Alisal Street, 1st Floor
Salinas, CA 93901