

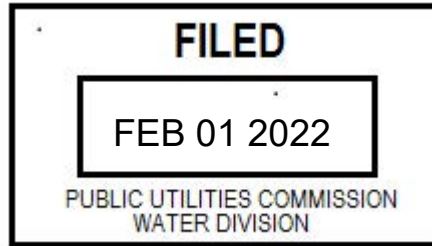


CALIFORNIA WATER SERVICE COMPANY

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February 1, 2022

Advice Letter No. 2441



To the California Public Utilities Commission:

California Water Service Company (“Cal Water”) respectfully submits this Tier 1 advice letter submitting modest revisions to its emergency disaster relief customer outreach plan. *Please note that, due to limitations on non-essential travel as a result of the COVID-19 virus, this advice letter will only be distributed electronically to the Water Division and the attached service lists.*

Summary

Based on Cal Water’s experiences with several disasters that triggered the Customer Protections established in D.19-07-015, Cal Water recommends some updates and modifications to its emergency disaster relief customer outreach plan to reflect the specific protections intended for water utilities.

Background

The California Public Utilities Commission (“Commission”) adopted D.19-07-015 on July 11, 2019. The decision implements an emergency disaster relief program for electric, natural gas, water, and sewer utility customers under the Commission’s jurisdiction. The emergency disaster relief program is designed to ensure that utility customers, who experience a housing or financial crisis due to a disaster, keep vital utility services and receive financial support in the wake of a disaster.

According to D.19-07-015, experience shows that some customers have relatively less access to information regarding emergency preparedness. In order for customers to have equal access to the protections provided in the decision, it is important to ensure that all utility customers are aware of the emergency customer protections before a disaster occurs. It is vital to raise awareness about the existence of the emergency protections before a disaster occurs so that customers are prepared. Therefore, the decision establishes a baseline of required outreach and education activities to ensure each utility’s plan is robust to reach affected customers.

Ordering paragraph 13 states,

13. All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B Water utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service).) shall file a



Tier 1 Advice Letter 60 days from the effective date of this decision, setting forth the plan for customer outreach of these protections in English, Spanish, Chinese (including Cantonese, Mandarin, and other Chinese languages), Tagalog, and Vietnamese as well as Korean and Russian where those languages are prevalent within the utilities' service territories.

Cal Water submitted AL 2351 in compliance with the above ordering paragraph.

Discussion

Since Cal Water filed AL 2351, which included our emergency disaster relief customer outreach plan, the company has made some changes to our policies and would like to update the plan to reflect those changes. A revised version of Cal Water's "Emergency Disaster Relief Program" is provided as Attachment A. A redline version will also be included as Attachment B. The proposed updates are found on page 2 and 3 of the document. For example, we recently renamed our Corporate Citizenship Report to the Environmental Social Governance (ESG) Report. This report is now sent out annually in April instead of September. During and after a disaster we now also try and use Nextdoor where appropriate.

In addition, under the "Objective" section, Cal Water proposes to remove the reference to "at least twice a year" as shown below to allow for flexibility as Cal Water addresses the differing needs of its customers throughout the state.

To demonstrate our commitment to our customers enduring hardship following natural disasters, and fulfill the provisions of the CPUC's D.19-07-015 to inform customers on an ongoing basis ~~(at least twice per year)~~ about options we have available to support and protect them.

Cal Water's regular business practices encompassed most of the customer protections mandated for water companies by D.19-07-015. For example, Cal Water has always worked with customers to minimize disconnections for non-payment, including offering extended payment plans, and does not require either customer deposits or late fees.

With the development of the emergency disaster relief customer outreach plan filed in AL 2351, Cal Water began regularly informing customers of those protections, as well as additional protections identified in D.19-07-015, including some that were directed towards energy companies.¹

Cal Water now proposes to modify three of its customer protection to more closely reflect the specific protections required for water utilities.² Items 4, 6, and 10, below, have been deleted or modified accordingly, with new material underlined and strike-outs of deleted material. For

¹ See, e.g., D.19-07-015, pages 58-59, Conclusion of Law 14.

² D.19-07-015, pages 61-62, Conclusion of Law 25.



example, Cal Water’s understanding is that item 10 was adopted for energy companies due to their long-standing relationships with community-based organizations (“CBOs”) because of their CARE/FERA/ESA programs. While Cal Water does not have similar established partnerships, Cal Water nevertheless works with such organizations in several ratemaking areas.

We request the following revisions to our customer protection provisions:

1. Expedite start/end service requests
2. Automatically close accounts for homes destroyed and waive the final bill
3. Suspend disconnection for non-payment and related fees (e.g., late fees, deposits)
4. ~~Suspend collection activities for non-payment~~ Work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment
5. Waive any deposit requirements for residents and small businesses seeking to reestablish service for one year
6. ~~Stop any estimated usage for billing attributed to time when home were unoccupied due to event~~
7. Offer extended payment plan options on a case-by-case basis
8. Provide a bill credit for customers who had to evacuate, to account for the time not able to be home, and/or prorate the monthly service charge
9. Provide additional bill credits for customers whose homes are not destroyed but are either damaged or uninhabitable for a time, and/or prorate the monthly service charge
10. Freeze certification reviews for low-income ratepayer assistance (~~LIRA~~) program participants affected, and try to make community-based assistance organizations aware of support/program to help reach low-income customers

In Attachment A on page 1 under the section titled “Provisions,” changes have been made to reflect the modifications shown above.

Requested Effective Date

Cal Water requests an effective date of February 01, 2022.

Notice

Customer Notice: Customer notice of Tier 1 advice letters is not required under General Order 96-B, General Rule 7.3.1.

Service List: In accordance with General Order 96-B, General Rule 4.3 and 7.2 and Water Industry Rule 4.1, a copy of this advice letter will be transmitted **electronically** on **February 1, 2022** to competing and adjacent utilities and other utilities or interested parties having requested such notification, including the Local Agency Formation Commission (LAFCO). **Please note that, due to**



limitations on non-essential travel as a result of the COVID-19 virus, this advice letter will only be distributed electronically.

Response or Protest

Anyone may respond to or protest this advice letter. When submitting a response or protest, please include the utility name and advice letter number in the subject line. 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 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 by mail (or e-mail) to Cal Water at the following address:

Natalie Wales
California Water Service Company
1720 North First Street,
San Jose, California 95112
E-mail: cwsrates@calwater.com

Cities and counties requiring Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division within the 20-day protest period so a late-filed protest can be entertained. The informing document should include an estimate of the date the proposed



CALIFORNIA WATER SERVICE COMPANY

Advice Letter 2441 Revisions to Emergency Customer Protections

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protest might be voted on. The advice letter process does not provide for any responses, protests or comments, except for the utility's reply, after the 20-day comment period.

Replies: The utility shall reply to each protest and may reply to any response. Each reply must be received by the Water Division within 5 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. If you have not received a reply to your protest within 10 business days, contact California Water Service Company at (408) 367-8200, and ask for the Rates Department.

CALIFORNIA WATER SERVICE COMPANY

/s/

Natalie Wales,
Director, Regulatory Policy & Compliance

cc: Syreeta Gibbs (Public Advocates Office), PublicAdvocatesWater@cpuc.ca.gov

ATTACHMENT A

Emergency Disaster Relief Program

Emergency Disaster Relief Program

Outreach and Communication Plan

Objective

To demonstrate our commitment to our customers enduring hardship following natural disasters, and fulfill the provisions of the CPUC's D.19-07-015 to inform customers on an ongoing basis about options we have available to support and protect them. For wildfires in particular, customer outreach about available customer protections will occur before, during, and after a wildfire.

Key Messages

- California Water Service is committed to providing quality, service, and value to our customers, and part of this commitment includes supporting them when they have been impacted by natural disasters.
- We want our customers' water service/bills to be one less thing to worry about when they have been affected by a disaster, so we will implement a number of water service-related protections for all impacted customers following the disaster.
- We will also work with our customers individually if they need additional support.

Audiences

- Customers at large
- Low-income customers
- City/community leaders
- Media (secondary)

Provisions

- Expedite start/end service requests
- Automatically close accounts for homes destroyed and waive final bill
- Suspend disconnection for non-payment and related fees (late fees, deposits)
- Work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment
- Waive any deposit requirements for residents and small businesses seeking to reestablish service for one year
- Offer extended payment plan options on a case-by-case basis
- Provide bill credit for customers who had to evacuate, to account for time not able to be home, and/or prorate monthly service charge
- Provide additional bill credit for customers whose homes are not destroyed but are either damaged or uninhabitable for a time, and/or prorate monthly service charge
- Freeze certification reviews for low-income ratepayer assistance program participants affected, and try to make community-based assistance organizations aware of support/program to help reach low-income customers

Emergency Disaster Relief Program of California Water Service (January 2022)

Tactical Plan: Before a Disaster

Channel	Description	Due Date
Web site	Establish web page about Cal Water’s Emergency Disaster Relief Program and provisions; provide links to same information in Spanish, Chinese, Tagalog, and Vietnamese; ensure accessibility for visually or otherwise-impaired customers	9/16/19
Customer Center lobby	Provide copies of general fact sheet available for customers to take that includes program info and provisions; translate and make available in Spanish, Chinese, Tagalog, and Vietnamese	9/16/19
Community leaders	Send email to city/county leaders regarding program and provisions for customers in disasters	9/16/19
Media	Prepare and distribute press release announcing program/provisions across wire and send to local outlets; tie to Emergency Preparedness Month (September)	9/16/19
Community-based organizations	Send email to appropriate organizations to make them aware of our program and provisions for customers in disasters	9/16/19
Social media	Post about program on Facebook and Twitter	Annually
Customer bills	Run full-page bill insert (back of bill) with program information in English, Spanish, Chinese, Tagalog, and Vietnamese; add bill message on front of bill to note more information in back of bill	Fall
Customer Service/Field Reps	Provide details via intranet article to help CSRs respond to customer inquiries	9/16/19
Environmental Social Governance (ESG) Report	Add paragraph on program in customer section of annual corporate citizenship report	Annually in April
Community events	Provide copies of general program fact sheet at any emergency preparedness-related events	Throughout year

Tactical Plan: During/After a Disaster

Channel	Description
Web site	Establish disaster-specific web page/alert about Cal Water provisions/assistance; link to general page for additional info; ensure accessibility for visually or otherwise-impaired customers
Customer email	Send email to customers affected by disaster with information on steps we are taking to support them or handle their account
Customer phone	Call affected customers who are unable to be reached via email
Community leaders	Send email to city/county leaders regarding specific actions we are taking following disaster and support we are offering to customers

Emergency Disaster Relief Program of California Water Service (January 2022)

Media	Send press release to local media outlets regarding specific support being offered to affected customers, to help inform affected customers
Social media	Post on Facebook, Twitter and/or Nextdoor as appropriate regarding specific support for affected customers; boost to affected community
Customer Service/ Field Reps	Provide talking points for CSRs specific to disaster on customer provisions, details on service interruptions/restoration, other support
Customer Center lobby	Provide any disaster-specific fact sheet at lobby counter and talking points to cashier
Water distribution center/care station	Provide copies of general program fact sheet or disaster-specific fact sheet along with water and possibly food staples
Community assistance events	Establish presence/ booth at community assistance events post-disaster as appropriate to assist affected customers

Other Activities

Activity	Description
CEMA Activation	Rates department to request activation of the CEMA effective to the time of the declaration of emergency.
Insurance Claims	Risk Management to make insurance claims on all costs and expenses incurred as a result of disaster. Rates and Accounting departments to ensure any insurance payments are credited to the CEMA.

ATTACHMENT B

Redline Version of Emergency Disaster Relief Program

Emergency Disaster Relief Program

Outreach and Communication Plan

Objective

To demonstrate our commitment to our customers enduring hardship following natural disasters, and fulfill the provisions of the CPUC's D.19-07-015 to inform customers on an ongoing basis ~~(at least twice per year)~~ about options we have available to support and protect them. For wildfires in particular, customer outreach about available customer protections will occur before, during, and after a wildfire.

Key Messages

- California Water Service is committed to providing quality, service, and value to our customers, and part of this commitment includes supporting them when they have been impacted by natural disasters.
- We want our customers' water service/bills to be one less thing to worry about when they have been affected by a disaster, so we will implement a number of water service-related protections for all impacted customers following the disaster.
- We will also work with our customers individually if they need additional support.

Audiences

- Customers at large
- Low-income customers
- City/community leaders
- Media (secondary)

Provisions

- ~~• Waive any deposit requirements for residents and small businesses seeking to reestablish service for one year~~
- Expedite start/end service requests
- Automatically close accounts for homes destroyed and waive final bill
- Suspend disconnection for non-payment and related fees (late fees, deposits)
- ~~• Suspend collection activities for non-payment~~ Work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment
- ~~•~~
- ~~•~~ Waive any deposit requirements for residents and small businesses seeking to reestablish service for one year
-
- ~~• Stop any estimated usage for billing attributed to time when home were unoccupied due to event, if needed~~
- Offer extended payment plan options on a case-by-case basis
- Provide bill credit for customers who had to evacuate, to account for time not able to be home, and/or prorate monthly service charge

- Provide additional bill credit for customers whose homes are not destroyed but are either damaged or uninhabitable for a time, and/or prorate monthly service charge
- Freeze certification reviews for low-income ratepayer assistance (~~LIRA~~) program participants affected, and try to make community-based assistance organizations aware of support/program to help reach low-income customers

Tactical Plan: Before a Disaster

Channel	Description	Due Date
Web site	Establish web page about Cal Water’s Emergency Disaster Relief Program and provisions; provide links to same information in Spanish, Chinese, Tagalog, and Vietnamese; ensure accessibility for visually or otherwise-impaired customers	9/16/19
Customer Center lobby	Provide copies of general fact sheet available for customers to take that includes program info and provisions; translate and make available in Spanish, Chinese, Tagalog, and Vietnamese	9/16/19
Community leaders	Send email to city/county leaders regarding program and provisions for customers in disasters	9/16/19
Media	Prepare and distribute press release announcing program/provisions across wire and send to local outlets; tie to Emergency Preparedness Month (September)	9/16/19
Community-based organizations	Send email to appropriate organizations to make them aware of our program and provisions for customers in disasters	9/16/19
Social media	Post about program twice per year on Facebook and Twitter	Spring (Feb/March) and September <u>Annually</u>
Customer bills	Run full-page bill onsert (back of bill) with program information in English, Spanish, Chinese, Tagalog, and Vietnamese; add bill message on front of bill to note more information in back of bill	Spring and October <u>Fall</u>
Customer Service/ Field Reps	Provide details via intranet article to help CSRs respond to customer inquiries	9/16/19
Corporate Citizenship Environmental Social Governance (ESG) Report	Add paragraph on program in customer section of annual corporate citizenship report	Annually in April <u>September</u>

Community events	Provide copies of general program fact sheet at any emergency preparedness-related events	Throughout year
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Tactical Plan: During/After a Disaster

Channel	Description
Web site	Establish disaster-specific web page/alert about Cal Water provisions/assistance; link to general page for additional info; ensure accessibility for visually or otherwise-impaired customers
Customer email	Send email to customers affected by disaster with information on steps we are taking to support them or handle their account
Customer phone	Call affected customers who are unable to be reached via email
Community leaders	Send email to city/county leaders regarding specific actions we are taking following disaster and support we are offering to customers
Media	Send press release to local media outlets regarding specific support being offered to affected customers, to help inform affected customers
Social media	Post on Facebook, and Twitter <u>and/or Nextdoor as appropriate</u> regarding specific support for affected customers; boost to affected community
Customer Service/Field Reps	Provide talking points for CSRs specific to disaster on customer provisions, details on service interruptions/restoration, other support
Customer Center lobby	Provide any disaster-specific fact sheet at lobby counter and talking points to cashier
Water distribution center/care station	Provide copies of general program fact sheet or disaster-specific fact sheet along with water and possibly food staples
Community assistance events	Establish presence/ booth at community assistance events post-disaster as appropriate to assist affected customers

Other Activities

Activity	Description
CEMA Activation	Rates department to request activation of the CEMA effective to the time of the declaration of emergency.
Insurance Claims	Risk Management to make insurance claims on all costs and expenses incurred as a result of disaster. Rates and Accounting departments to ensure any insurance payments are credited to the CEMA.



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ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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Bayshore District (Bay Area Region)

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Bear Gulch District

ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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Bear Gulch District

ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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Chico District

ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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Dixon District

ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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Los Altos District

ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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Travis District

ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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Willows District

ADVICE LETTER FILING MAILING LIST
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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