

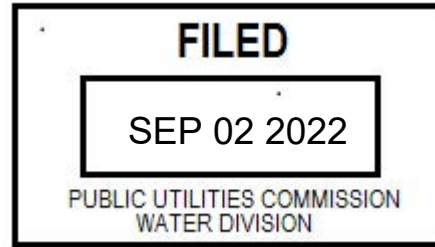




**CALIFORNIA WATER SERVICE COMPANY**  
1720 NORTH FIRST STREET  
SAN JOSE, CA 95112 • (408) 367-8200 • F (408) 367-8428

September 02, 2022

**Advice Letter No. 2458**



To the California Public Utilities Commission:

California Water Service Company (“Cal Water”) respectfully submits this Tier 1 advice letter in compliance with Ordering Paragraph 12 of D.19-07-015, *Decision Adopting an Emergency Disaster Relief Program for Electric, Natural Gas, Water and Sewer Utility Customers* with regards to the collaboration with state agencies due to the French Fire within Kern County in August of 2021. ***Please note that this advice letter will only be distributed electronically to the Water Division and the attached service lists.***

**Summary**

This Tier 1 advice letter confirms Cal Water’s compliance with the collaboration activities required by D.19-07-015 triggered by the French Fire in August 2021 that affected Cal Water’s Kern River Valley ratemaking area (specifically the Split Mountain and Arden systems in Wofford Heights).

**Background**

D.19-07-015 requires water and sewer companies to file a Tier 1 advice letter 12 months after a state of emergency was proclaimed for an event affecting the water or sewer company. The Tier 1 advice letter is intended to affirm to the California Public Utilities Commission that the company is complying with the collaboration activities.

In D.19-07-015, the Commission provided as follows in Ordering Paragraph 12:

12. All Class-A Water utilities ... shall file a Tier 1 Advice Letter twelve months from a qualifying event, documenting the collaborative engagement they had with the Governor’s Office of Emergency Services and the California Department of Forestry and Fire Protection demonstrating information sharing that aided these entities in carrying out their mission.

The Commission also adopted the following Conclusion of Law relevant to Ordering Paragraph 12:

21. It is reasonable to require the utilities, twelve months following a qualifying event, to file a Tier 1 Advice Letter describing the collaborative engagement they had with CalOES and CalFIRE



## CALIFORNIA WATER SERVICE COMPANY

Advice Letter 2458 – French Fire Collaboration with Other Agencies

demonstrating information sharing that aided CalOES and CalFIRE to carry out their missions.

### **Discussion**

On August 25, 2021, Governor Newsom “announced that California has secured a Fire Management Assistance Grant (FMAG) from the Federal Emergency Management Agency (FEMA) to help ensure the availability of vital resources to suppress the French Fire in Kern County.”<sup>1</sup> Cal Water filed Advice Letter 2417 on September 03, 2021, confirming Cal Water’s compliance with the emergency customer protections and outreach activities required by D.19-07-015. Cal Water performed various collaborative activities related to this event, as detailed below.

Cal Water was actively involved in the meetings that the Governor’s Office of Emergency Services and/or the California Department of Forestry and Fire Protection (Cal OES/CAL FIRE) set up twice daily for the French Fire in August of 2021 affecting Cal Water’s Kern River Valley service area. The 10am briefing was for the collaborators involved in the fire such as Cal Water, various county agencies, and Southern California Edison. Cal Water worked hard to maintain an open line of communication with the various fire service agencies involved by providing contact information for those on call throughout the incident, regular check-ins, and being involved with the emergency operations center managed by California Fire Incident Management Team 12.

As a general matter, during a fire incident near Cal Water’s service area, the company seeks to be an active participant by “getting a seat at the table” in any emergency operations center (EOC) that is set up by CAL FIRE/Cal OES. In this case, Cal Water attended all open meetings, shared contacts, and actively engaged with Battalion Chiefs to make sure that the company was meeting the needs created by the incident. At certain points, when our water systems were being used to combat the fires, Cal Water made sure to work collaboratively with Incident Commander Chief Steers to let him know what water systems were operational, the locations of our assets, maximum capacities, and general updates. Overall, Cal Water is dedicated to providing the Governor’s Office of Emergency Services and the California Department of Forestry and Fire Protection with the information that these entities need to carry out their missions.

### **Requested Effective Date**

Pursuant to OP 12 of D.19-07-015, this is filed as a Tier 1 advice letter. Cal Water does not request a specific effective date since this is a compliance filing without changes to Cal Water’s tariffs.

### **Notice**

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

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<sup>1</sup> <https://www.gov.ca.gov/2021/08/25/california-secures-federal-assistance-to-support-response-to-french-fire-in-kern-county/>



*Service Lists* – 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 **September 02, 2022** to competing and adjacent utilities and other utilities or interested parties having requested such notification. ***Please note that this advice letter will only be distributed electronically to the Water Division and the attached service lists.***

### **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, 3<sup>rd</sup> floor  
California Public Utilities Commission,  
505 Van Ness Avenue, San Francisco, CA 94102  
E-mail: [water.division@cpuc.ca.gov](mailto: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:



**CALIFORNIA WATER SERVICE COMPANY**  
Advice Letter 2458 – French Fire Collaboration with Other Agencies

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

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Albree Jewell  
Rates Analyst

cc: Syreeta Gibbs (Public Advocates Office)  
[PublicAdvocatesWater@cpuc.ca.gov](mailto:PublicAdvocatesWater@cpuc.ca.gov)



## **Kern River Valley District**

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

DARLENE STUDDARD, COMMITTEE  
MEMBER  
**Residents Against Water Rates RAW**  
P.O.Box 3701  
Wofford Heights, CA 93285

JEREMY CALLIHAN  
**Department of Water Resources Safe  
Drinking Water Program**  
1416 Ninth St, Rm. 816  
Sacramento, CA 95814  
[jeremy.callihan@water.ca.gov](mailto:jeremy.callihan@water.ca.gov)

LINDA NG  
**Department of Water Resources Safe  
Drinking Water Program**  
1416 Ninth St, Rm. 816  
Sacramento, CA 95814  
[linda.ng@water.ca.gov](mailto:linda.ng@water.ca.gov)

**ROB BENSON**  
P.O.Box 1557  
Kernville, CA 93238  
[rcbenso@earthlink.net](mailto:rcbenso@earthlink.net)

### **ONLY FOR SERVICE AREA MAPS:**

EXECUTIVE OFFICER  
**Kern County LAFCO**  
5300 Lennox Ave, Suite 303  
Bakersfield, CA 93309  
[kclafco@bak.rr.com](mailto:kclafco@bak.rr.com)