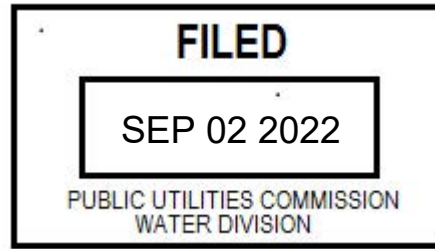




CALIFORNIA WATER SERVICE COMPANY
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SAN JOSE, CA 95112 • (408) 367-8200 • F (408) 367-8428

September 2, 2022

Advice Letter No. 2459



To the California Public Utilities Commission:

California Water Service Company (“Cal Water”) respectfully submits this Tier 1 advice letter in compliance with Ordering Paragraph 11 of D.19-07-015, *Decision Adopting an Emergency Disaster Relief Program for Electric, Natural Gas, Water and Sewer Utility Customers* with regard to the conclusion of its emergency customer protections due to the impact on Cal Water’s customers during the French Fire within Kern County. ***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 emergency customer protections triggered by the French Fire that began in August 2021. Cal Water’s Kern River Valley ratemaking area (specifically the Split Mountain and Arden systems in Wofford Heights) were impacted by this emergency.

Background

From July 16, 2021 until the end of 2021, Governor Gavin Newsom signed eight Emergency Proclamations relating to statewide wildfires in the State of California.¹ On August 24, 2021, President Biden approved California’s disaster declaration. President Biden “declared that a major disaster exists in the State of California and ordered Federal aid to supplement State, tribal, and local recovery efforts in the areas affected by wildfires beginning on July 14, 2021, and continuing.”²

On August 25, 2021, Governor Newsom “announced that California has secured a Fire Management Assistance Grant (FMAG) from the Federal Emergency Management Agency (FEMA)

¹ <https://www.gov.ca.gov/wp-content/uploads/2021/07/7-16-21-SOE-Proc-Lava-and-Beckwourth.pdf>
<https://www.gov.ca.gov/wp-content/uploads/2021/07/7.23.21-SOE-Dixie-Fly-Tamarack.pdf>
<https://www.gov.ca.gov/wp-content/uploads/2021/08/8.5.21-River-and-Antelope-SOE.pdf>
<https://www.gov.ca.gov/wp-content/uploads/2021/08/8.10.21-Monument-McFarland-Dixie-Fire.pdf>
<https://www.gov.ca.gov/wp-content/uploads/2021/08/8.17.21-Caldor-Fire-Proclamation.pdf>
<https://www.gov.ca.gov/wp-content/uploads/2021/08/8.30.21-Caldor-Fire-SOE.pdf>
<https://www.gov.ca.gov/wp-content/uploads/2021/09/9.7.21-Cache-Fire-SOE.pdf>
<https://www.gov.ca.gov/wp-content/uploads/2021/09/9.27.21-SOE-Fawn-Fire.pdf>

² <https://www.whitehouse.gov/briefing-room/statements-releases/2021/08/24/president-joseph-r-biden-jr-approves-california-disaster-declaration/>



to help ensure the availability of vital resources to suppress the French Fire in Kern County.”³ 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.

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. This Tier 1 advice letter is intended to notify the California Public Utilities Commission the conclusion of its emergency customer protections.

In D.19-07-015, the Commission provided as follows in Ordering Paragraph 11:

11. All Class-A Water utilities ... shall file a Tier 1 Advice Letter at the default, 12-month conclusion of customer protection period (running from the date that customer protections related to the specific disaster became effective), or as reasonably determined by the Governor’s Office of Emergency Services, detailing the mandated protections offered to the customer affected by the disaster, the start and end periods customers received the emergency customer protections, the outreach efforts conducted, the customer impacts, and the associated cost.

The Commission also adopted the following Conclusion of Law relevant to Ordering Paragraph 11:

10. It is reasonable to require the [...] water, and sewer utilities, as identified in Conclusion of Law 2, to conclude the administration of the mandated customer protections no sooner than twelve (12) months from the date of the emergency proclamation or as appropriately determined by the Governor’s Office of Emergency Services and to affirmatively communicate with customers throughout the duration of the protection period about the timeline of protections

In an email on October 28, 2020, Staff issued additional guidance as to what information it required in the advice letters filed at the conclusion of the customer protection period.

- 1) The mandated protections offered to the customers affected by the disaster
- 2) The start and end periods customers received the emergency customer protections
 - Start date = when the proclamation was declared
 - End date = the date the provider stopped offering the consumer protections

³ <https://www.gov.ca.gov/2021/08/25/california-secures-federal-assistance-to-support-response-to-french-fire-in-kern-county/>



3) The outreach efforts the company undertook to inform their customers about the availability of the mandated protections.

4) The customer impacts

- Number of customers impacted by the declared disaster event

5) Basic metrics that can be measured or estimated, including number of consumers that received each of the available protections over the course of the year.

- For example, the number of customers that received extended payment dates for their bills

Discussion

On August 24, 2021, President Biden approved California’s disaster declaration. President Biden “declared that a major disaster exists in the State of California and ordered Federal aid to supplement State, tribal, and local recovery efforts in the areas affected by wildfires beginning on July 14, 2021, and continuing.”⁴

Following issuance of President Biden’s disaster declaration on August 24, 2021, and in accordance with D.19-07-015, Cal Water confirms that it implemented the required customer protections, including working cooperatively with customers to establish reasonable payment options, waiving any reconnection fees for impacted customers, automatically closing accounts for homes destroyed and waiving final bills, expediting start/end service requests, and providing bill credits for customers who had to evacuate.

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. Several of the mandated customer protections were already in place due to COVID-19, and we continue to work with our customers individually if they need additional support. Cal Water regularly communicates about emergency customer protections through bill inserts, and when customer protections are implemented, we communicate with the affected customers comprehensively via social media (broader outreach), Nextdoor (more targeted), emails, phone calls, and our website (ensuring accessibility for visually or otherwise-impaired customers) in both Spanish and English, the languages commonly spoken in our service areas.

For the French Fire, we utilized social media (broader outreach), Nextdoor (more targeted), and emails to inform customers affected by the disaster on steps we were taking to support them and handle their account. If we could not get ahold of them by those means, we called them directly. Cal Water was made aware of 1 customer home that was destroyed due to the French Fire, and we called the customer directly to support them and handle their account. Cal Water waived the final bill for this customer who lost their home as a result of this event. Cal Water also provided a pro rata credit ranging from \$25 to \$50 for the roughly 1,470 customers impacted by the

⁴ <https://www.whitehouse.gov/briefing-room/statements-releases/2021/08/24/president-joseph-r-biden-jr-approves-california-disaster-declaration/>



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mandatory evacuation (and DO NOT DRINK/DO NOT BOIL order) triggered by these events that occurred between 8/20/2021 and 9/02/2021. Finally, Cal Water included a message to all active accounts that were impacted by the French Fire that they should not be charged any reconnection fees for at least 12 months.

In terms of a basic metrics that can be measured or estimated for the Kern River Valley District, Cal Water has roughly 5,500 customers. Approximately 1,470 customers were impacted by mandatory evacuation and roughly 88 customers were impacted by DO NOT DRINK/DO NOT BOIL Orders during this disaster. Between August 18, 2021 and August 24, 2022, 210 payment arrangements began in the Kern River Valley District. Cal Water cannot identify the percentage of payment arrangements that were requested specifically as a result of the French Fire, however.

Requested Effective Date

Pursuant to OP 11 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.

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 2, 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



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(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 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/

Albree Jewell,
Rates Analyst

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



Kern River Valley District

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

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ONLY FOR SERVICE AREA MAPS:

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