

CALIFORNIA PUBLIC UTILITIES COMMISSION Water Division

Advice Letter Cover Sheet

Utility Name: Cold Springs Water Co., Inc.

Date Mailed to Service List: 9/16/22

District: NA

CPUC Utility #: WTC-176

Protest Deadline (20th Day): 10/5/22

Advice Letter #: 82-W

Review Deadline (30th Day): 10/17/22

Tier 1 2 3 Compliance

Requested Effective Date: 10/05/22

Authorization GO 96-B; SP U-7-W

Rate Impact: \$0

0%

Description: Vacation homes discontinuance/restoration of service and late payment charge

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.

Utility Contact: Pete Kerns

Utility Contact: Kim Merrihew

Phone: 209-410-4330

Phone: 209-410-4330

Email: office@coldspringwater.com

Email: office@coldspringwater.com

DWA Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

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

[] APPROVED
REJECTED

[] WITHDRAWN

[]

Signature: _____ Comments: _____

Date: _____

COLD SPRINGS WATER COMPANY, INC.

2980 Highway 108
Cold Springs CA 95335
Telephone 209-410-4330

September 16, 2022

Advice Letter No. 82-W

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Cold Springs Water Company, Inc. (CSWC) hereby transmits for filing one original and one copy of this advice letter (AL) and the following tariff sheets which are enclosed:

<u>NEW SHEET #</u>	<u>TITLE</u>	<u>CANCELLING SHEET #</u>
486-W	Schedule No. 1, General Metered Service	
487-W	Schedule No. LC, Late Payment Charge	385-W
	Rule No. 11, Discontinuance and	
488-W	Restoration of Service	460-W
489-W	Table of Contents	485-W

REQUEST

By AL #82-W, CSWC requests the following:

1. to revise the language to its tariffs to manage the reconnection process for those customers or former customers whose service has been disconnected, voluntarily or involuntarily. CSWC requests to collect, in addition to monthly service charges, the principal and interest surcharges, to be collected prior to the customer resuming service; and,
2. to increase the late payment charge from \$5 to \$25 to encourage its customers to pay their bills on time.

COLD SPRINGS WATER COMPANY, INC.

2980 Highway 108
Cold Springs CA 95335
Telephone 209-410-4330

BACKGROUND

CSWC requests similar treatment to the North Gualala Water Company, Inc. in Resolution W-4121. By Resolution W-4121, November 19, 1998, the Commission approved the following language for use in Rule 11 of North Gualala Water Company, Inc. to prevent vacation homeowners from disconnecting and reconnecting to avoid service charges: "Any customer, prior to resuming service within twelve months after such service was discontinued, will be required to pay all service charges which would have been billed if service had not been discontinued." Additionally, Standard Practice U-7-W, C.10 states that summer and vacation customers should pay their fair share of fixed and variable costs of the system. This can be done by imposing an annual service charge. CSWC wishes to adopt the same language in its Rule 11 as in Ordering Paragraph No. 1(c) of Resolution W-4121.

CSWC is expending unnecessary expenses in collecting from slow paying customers. From January 2021 to May 2022, an average of 28.78% of the amount billed is delinquent. There is an average of 11.37% that are over 60 days or more. CSWC believes that increasing the late payment charge from \$5 to \$25 will encourage customers to make timely payments. Attached is an ageing account receivable schedule.

COLD SPRINGS WATER COMPANY, INC.

2980 Highway 108
Cold Springs CA 95335
Telephone 209-410-4330

TIER DESIGNATION AND REQUESTED EFFECTIVE DATE

These AL and enclosed tariffs are submitted pursuant to Water Industry Rule 7.3.2(2) of General Order (GO.) 96-B and this advice letter is designated as a Tier 2 filing. This advice letter will become effective upon approval or deemed approval by DWA staff. ¹

NOTICE

A copy of this AL has been served to all parties listed on the service list² on the last page of this AL. This filing will not cause withdrawal of service nor conflict with any other schedule or rule.

RESPONSE OR PROTEST³

Anyone may respond to or protest this AL. A response supports the filing and may contain information that proves useful to the Commission in evaluating the AL. A protest objects to the AL 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 AL;
2. The relief requested in the AL 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 AL contain material error or omissions;
4. The relief requested in the AL is pending before the Commission in a formal proceeding; or
5. The relief requested in the AL requires consideration in a formal hearing, or is otherwise inappropriate for the AL process; or

¹GO. 96-B, Water Industry Rule 7.3.2

²GO. 96-B, Water Industry Rule 4.2

³ GO. 96-B, General Rule 7.4.1

COLD SPRINGS WATER COMPANY, INC.

2980 Highway 108
Cold Springs CA 95335
Telephone 209-410-4330

6. The relief requested in the AL 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 may not rely on policy objections to an AL where the relief requested in the AL follows rules or directions established by statute or Commission order applicable to the utility.

COLD SPRINGS WATER COMPANY, INC.

2980 Highway 108
Cold Springs CA 95335
Telephone 209-410-4330

A protest shall provide citations or proofs where available to allow staff to properly consider the protest. Water Division (WD) must receive a response or protest via email (or postal mail) within 20 days of the date the AL is filed. The addresses for submitting a response or protest are:

Email Address:

Water.Division@cpuc.ca.gov

Mailing Address:

California Public Utilities
Commission
Water Division, 3rd Floor
505 Van Ness Avenue
San Francisco, CA 94102

On the same day the response or protest is submitted to WD, the respondent or protestant shall send a copy of the protest to CSWC at:

Email Address:

office@coldspringswater.com

Mailing Address:

Cold Springs Water Company, Inc.
2980 Highway 108
Cold Springs CA 95335

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform WD, 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. Any reply must be received by WD within five business days after the end of the protest period, and shall be served on the same day on each person who filed the protest or response to the AL.⁴

⁴ GO. 96-B, General Rule 7.4.3

COLD SPRINGS WATER COMPANY, INC.

2980 Highway 108
Cold Springs CA 95335
Telephone 209-410-4330

ADVICE LETTER #82-W

SERVICE LIST

Del Oro Water Company
Attn: Bob Fortino
robert@corporatecenter.us

Bruce Ramsden, P.E.
Associate Sanitary Engineer
State Water Resources Control Board
Division of Drinking Water – Merced District (11)
West Bullard Ave, Suite 101
Fresno, CA 93704

Tuolumne Utilities District
Attn: Don Perkins
18885 Nugget Road
Sonora, CA 95370

I hereby certify that the above service list has been served a copy of AL 82-W on September 16, 2022.

Executed in Cold Springs, California on the September 16, 2022.

Cold Springs Water Company, Inc.

By: /s/ PETE KERNS

Pete Kerns

President

Enclosures

Cold Springs Water Company

Schedule No. 1

GENERAL METERED SERVICE

(Continued)

SPECIAL CONDITIONS

- 1. All bills are subject to the reimbursement fee set forth in Schedule UF.
- 2. In the event that a customer terminates service under this schedule and reinstates service at the same location, there will be a reconnection charge (see Rule No. 11, C. Restoration of Service, 1. Reconnection Charge). Any customer, prior to resuming service within twelve months after such service was discontinued, will be required to pay all service charges and surcharges that would have been billed if service had not been discontinued. (N)

(To be inserted by utility)

Advice Letter No. 82-W

Decision No. _____

Issued By

Pete Kerns

President

(To be inserted by P.U.C.)

Date Filed _____

Effective _____

Resolution No. _____

Cold Springs Water Company

Schedule No. LC

LATE PAYMENT CHARGE

APPLICABILITY

Applicable to all metered water service.

TERRITORY

Applicable to all services as shown on the Service Area Map.

RATES

Late Charge: A late charge of **\$25.00** on unpaid balance subject to the special conditions (I) below.

SPECIAL CONDITIONS

1. The balance is unpaid and subject to a late charge if the bill is past due, or delinquent, as defined in Rule No. 11, Section B.1.a.
2. The late charge should be imposed only once on a delinquent bill since the account would be shut-off before a subsequent bill and then subject to the reconnection fee as authorized by Tariff Rule No. 11.
3. All bills are subject to the reimbursement fee set forth in Schedule UF.

(To be inserted by utility)

Advice Letter No. 82-W

Decision No. _____

Issued By

Pete Kerns

President

(To be inserted by P.U.C.)

Date Filed _____

Effective _____

Resolution No. _____

Rule No. 11
DISCONTINUANCE AND RESTORATION OF SERVICE
(Continued)

B. Discontinuance of Services by Utility (Continued)

- 4. For Unsafe Apparatus or Where Service is Detrimental or Damaging to the Utility or its Customers.
If an unsafe or hazardous condition is found to exist on the customer's premise, or if the use of water thereon by apparatus, appliances, equipment or otherwise is found to be detrimental or damaging to the utility or its customers, the service may be shut off without notice. The utility will notify the customer immediately of the reasons for the discontinuance and the corrective action to be taken by the customer before service can be restored.
- 5. For Fraudulent Use of Service
When the utility has discovered that a customer has obtained service by fraudulent means, or has diverted the water service for unauthorized use, the service to that customer may be discontinued without notice. The utility will not restore service to such customer until that customer has complied with all rules and reasonable requirements of the utility and the utility has been reimbursed for the full amount of the service rendered and the actual cost to the utility incurred by reason of the fraudulent use.

C. Restoration of Service

- 1. Reconnection Charge
Where service has been discontinued for violation of these rules or for nonpayment of bills, the utility may charge **\$50** for reconnection of service during regular working hours or **\$150** for reconnection of service at other than regular working hours when the customer has requested that the reconnection be made at other than regular working hours, except as otherwise provided by the utility's tariffs. **This same charge should be levied on customers who attempt to avoid disconnection by paying an overdue bill to the utility when the utility is performing discontinuance of service.** Customers may also be responsible for time and material costs associated with the disconnection and restoration of water service. The Reconnection Charge for those customers or former customers whose service has been discontinued shall be the total of the accumulated monthly service and surcharges, based on the customer's meter size as stated in Schedule 1, General Metered Service applicable to that meter size. The maximum accumulated service and surcharges shall be limited to 12 months. (C) (N) (N)
- 2. To be Made During Regular Working Hours
The utility will endeavor to make reconnections during regular working hours on the day of the request, if the conditions permit; otherwise, reconnections will be made on the regular working day following the day the request is made.
- 3. To Be Made at Other Than Regular Working Hours
When a customer has requested that the reconnection be made at other than regular working hours, the utility will reasonably endeavor to so make the reconnection if practicable under the circumstances.
- 4. Wrongful Discontinuance
A service wrongfully discontinued by the utility, must be restored without charge for the restoration to the customer within 24 hours.

(Continued)

(To be inserted by utility)

Issued By

(To be inserted by P.U.C.)

Advice Letter No. 82-W

Pete Kerns

Date Filed _____

Decision No. _____

President

Effective _____

Resolution No. _____

TABLE OF CONTENTS

The following listed tariff sheets contain all effective rates and rules affecting the charges and services of the utility, together with other pertinent information.

<u>SUBJECT MATTER OF SHEET</u>	<u>P.U.C. SHEET NO.</u>	
Title Page	434-W	
Table of Contents	489-W , 433-W	(T)
Preliminary Statements	100-W, 98-W, 479-W, 480-W	
Service Area Map	200-W	
Rate Schedules:		
Schedule No. 1 – General Metered Service	484-W, 486-W	(N)
Schedule No. UF – PUC Reimbursement Fee	465-W	
Schedule No. F – Facilities Fees	418-W	
Schedule No. Surcharge to Fund New Tank	331-W	
Schedule No. LC – Late Payment Charge	487-W	(I)
Rules:		
No. 1 – Definitions	442-W, 443-W	
No. 2 – Description of Service	11-W	
No. 3 – Application for Service	339-W	
No. 4 – Contracts	13-W	
No. 5 – Special Information Required on Forms	444-W - 446-W	
No. 6 – Establishment and Re-establishment of Credit	16-W	
No. 7 – Deposits	343-W, 344-W	
No. 8 – Notices	447-W - 449-W	
No. 9 – Rendering and Payment of Bills	347-W, 348-W	
No. 10 – Disputed Bills	450-W, 451-W	
No. 11 – Discontinuance and Restoration of Service	452-W -459-W, 488-W , 461-W	(C),(N)
No. 12 – Information Available to Public	27-W, 28-W	
No. 13 – Temporary Service	29-W, 30-W	
No. 14 – Continuity of Service	31-W	
No. 14.1 –Water Conservation& Rationing Plan	469-W-470-W, 409-W-415-W, 471-W-478-W	
No. 15 – Main Extensions	359-W, 357-W	
No. 16 – Service Connections, Meters, & Customer’s Facilities	372-W, 378-W	
No. 17 – Standards for Measurements of Service	184-W	
No. 18 – Meter Tests & Adjustment of Bills for Meter Error	45-W, 47-W	
No. 19 – Service to Separate Premises & Multiple Units and Resale of Water	185-W, 186-W	
No. 20 – Water Conservation	379-W	
No. 21 – Fire Protection	380-W	

(Continued)

(To be inserted by utility)

Advice Letter No. 82-W
Decision No. _____

Issued By

Pete Kerns
President

(To be inserted by P.U.C.)

Date Filed _____
Effective _____
Resolution No. _____

Cold Springs Water Company, Inc.
Accounts Receivable Detail
January 2021 - May 2022

Month	Total Charges <i>RTS, Water, PUC Tax</i>	1-30 Days	31-60 Days	> 60 Days	Total Receivables	% of Receivables	Late Charge Revenue
Jan-21	\$ 34,173.75	\$ 4,907.55	\$ 2,369.17	\$ 7,542.04	\$ 14,818.76	43.36%	\$ 355.00
Feb-21	\$ 34,462.36	\$ 5,936.07	\$ 1,946.60	\$ 7,613.12	\$ 15,495.79	44.96%	\$ 295.00
Mar-21	\$ 32,368.13	\$ 5,192.95	\$ 1,969.34	\$ 4,595.75	\$ 11,758.04	36.33%	\$ 630.25
Apr-21	\$ 31,218.75	\$ 5,990.19	\$ 2,320.96	\$ 5,235.74	\$ 13,546.89	43.39%	\$ 255.00
May-21	\$ 32,803.06	\$ 5,215.72	\$ 2,862.17	\$ 5,844.65	\$ 13,922.54	42.44%	\$ 320.00
Jun-21	\$ 34,495.53	\$ 3,012.93	\$ 1,624.87	\$ 5,519.90	\$ 10,157.70	29.45%	\$ 460.00
Jul-21	\$ 36,260.91	\$ 3,522.60	\$ 1,663.17	\$ 5,155.14	\$ 10,340.91	28.52%	\$ 165.00
Aug-21	\$ 32,139.28	\$ 4,106.01	\$ 1,354.75	\$ 4,560.19	\$ 10,020.95	31.18%	\$ 235.00
Sep-21	\$ 39,781.62	\$ 3,754.32	\$ 1,775.38	\$ 2,906.64	\$ 8,436.34	21.21%	\$ 225.00
Oct-21	\$ 40,102.79	\$ 5,302.25	\$ 1,351.59	\$ 2,611.85	\$ 9,265.69	23.10%	\$ 285.00
Nov-21	\$ 40,275.79	\$ 5,018.35	\$ 1,911.90	\$ 2,658.54	\$ 9,588.79	23.81%	\$ 265.00
Dec-21	\$ 40,275.79	\$ 5,263.76	\$ 2,074.66	\$ 2,734.63	\$ 10,073.05	25.01%	\$ 230.00
Jan-22	\$ 46,900.63	\$ 4,043.23	\$ 1,834.28	\$ 3,553.51	\$ 9,431.02	20.11%	\$ 225.00
Feb-22	\$ 40,786.36	\$ 3,816.29	\$ 1,223.34	\$ 3,365.03	\$ 8,404.66	20.61%	\$ 255.00
Mar-22	\$ 40,790.89	\$ 3,688.56	\$ 1,012.79	\$ 3,449.03	\$ 8,150.38	19.98%	\$ 195.00
Apr-22	\$ 39,273.75	\$ 3,858.49	\$ 1,150.99	\$ 3,056.45	\$ 8,065.93	20.54%	\$ 155.00
May-22	\$ 43,003.14	\$ 3,342.82	\$ 952.64	\$ 2,250.27	\$ 6,545.73	15.22%	\$ 360.00
Average	\$ 37,594.85	\$ 4,468.95	\$ 1,729.33	\$ 4,273.68	\$ 10,471.95	28.78%	\$ 288.84