



# Live Oak Springs Water Company

PO Box 3010, La Mesa, CA 91944.3010 [rmk@corpmtg.com](mailto:rmk@corpmtg.com)

April 20, 2020

Advice Letter No. 35-W

## TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Live Oak Springs Water Company (Live Oak) hereby transmits for filing one PDF copy of this advice letter 35-W:

### **REQUEST\PURPOSE**

By AL 35-W, LIVE OAK requests compliance with the March 26, 2020 letter to Class B, C, and D Water and Sewer Utilities, signed by Alice Stebbins, Executive Director, regarding Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency. Please activate the LIVE OAK CEMA on the effective date of Advice Letter 35-W.

### **BACKGROUND**

On March 4, 2020, Governor Newsom declared a Statewide emergency due to an outbreak of a respiratory illness caused by COVID-19. In response, LIVE OAK suspended disconnections for nonpayment and implemented flexible payment plans for all residential and non-residential customers. These measures will remain in place until further notice.

### **ELIGIBILITY REQUIREMENTS FOR EMERGENCY CUSTOMER PROTECTIONS**

Through this advice letter, LIVE OAK will implement consumer protections as described below for customers who self-certify that they have been financially affected by COVID-19, effective March 4, 2020, and will remain in place until March 4, 2021, or until otherwise ordered by the Commission.

LIVE OAK customers who self-certify that they are experiencing economic hardship due to COVID-19 will have their accounts identified or flagged in LIVE OAK's Customer Service System (CSS) as eligible for billing and credit protections as extended by the Commission. LIVE OAK will provide the following billing and credit protections:

**1. Suspend disconnections for affected customers**

When a customer self-identifies to LIVE OAK as being affected by COVID-19, LIVE OAK will suspend disconnections activities for those customers.

**2. Waive deposit requirements and late fees**

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When a customer self-identifies to LIVE OAK as affected by COVID-19, LIVE OAK will immediately confirm that the customer accounts are flagged and ensure that late fees and deposit requirements for reestablishment of credit are waived.

### 3. **Implement flexible payment plan options**

LIVE OAK will collaborate with affected customers to establish reasonable payment arrangements based upon the individual customer's needs. LIVE OAK may also recommend agency assistance and programs available to qualifying, affected customers. At a minimum, LIVE OAK will collaborate with customers who have prior arrearages to establish the following bill payment arrangements:

- Initial payment no greater than 20 percent of the amount due; and
- The remainder in equal installments over at least 12 billing cycles.

For those affected customers with utility service but who go into arrearage after March 4, 2020, LIVE OAK will establish the following bill payment arrangement:

- Initial payment no greater than 20 percent of the amount due; and
- The remainder in equal installments over at least 8 billing cycles.

## **TIER DESIGNATION AND REQUESTED EFFECTIVE DATE**

This AL is submitted pursuant to the above referenced March 26, 2020 letter Subject to CPUC action to ratify this direction, the utilities and service providers will be expected to file an Advice Letter (Tier I) reporting compliance with implementing the mandated customer protections.<sup>1</sup>

## **NOTICE**

A copy of this AL has been served to all parties listed on the service list<sup>2</sup> 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 PROTEST<sup>3</sup>**

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:

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<sup>1</sup> GO. 96-B, Water Industry Rule 7.3.1

<sup>2</sup> GO. 96-B, Water Industry Rule 4.1

<sup>3</sup> GO. 96-B, General Rule 7.4.1

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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
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.

A protest shall provide citations or proofs where available to allow staff to properly consider the protest. DWA 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](mailto: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 Water Division (WD), the respondent or protestant shall send a copy of the protest to Nazar Najor at: Live Oak Springs Water Company

**Email Address:**

[rmk@corpmgt.com](mailto:rmk@corpmgt.com)

**Mailing Address:**

Live Oak Springs Water Company  
PO Box 3010  
La Mesa, CA 91944.3010

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.<sup>4</sup>

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<sup>4</sup> GO. 96-B, General Rule 7.4.3

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## SERVICE LIST

- Recipient 1 Corporate Management, Inc.  
Attn: Richard M. Kipperman  
PO Box 3010  
La Mesa, CA 91944-3010  
[rmk@corpmgt.com](mailto:rmk@corpmgt.com)
- Recipient 2 County of San Diego  
PO Box 12961  
San Diego, CA 92101
- Recipient 3 California American Water Company  
4701 Beloit Drive  
Sacramento, CA 95838

I hereby certify that the above service list has been served a copy of AL 35-W on April 20, 2020.

Executed in Santa Paula, California on Monday, April 20, 2020.

Live Oak Springs Water Company

By: /s/Frank Brommenschenkel  
Richard Kipperman

Enclosures