

PUBLIC UTILITIES COMMISSION

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September 22, 2020

Jeffrey T. Linam
Vice President of Rates & Regulatory
California-American Water Company
4701 Beloit Drive
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Dear Mr. Linam,

The Commission has approved California-American Water Company's Advice Letter No. 1294, filed on May 1, 2020, regarding Covid-19 Customer Protections pursuant to CPUC Resolution M-4842.

Enclosed is a copy of the advice letter with an effective date of May 1, 2020 for the utility's files.

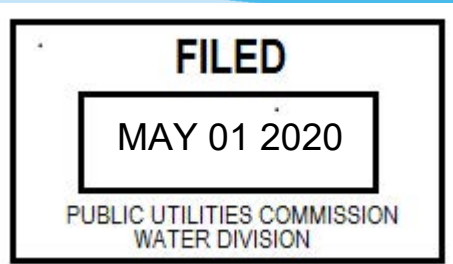
Please contact Jefferson Hancock at JHO@cpuc.ca.gov or 415-703-3453, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant
Water Division

Enclosures



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May 01, 2020

ADVICE LETTER NO. 1294

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

California-American Water Company (California American Water) (U210W) hereby submits for review this advice letter.

Subject: Description of Emergency Customer Protections Implemented to Support California Customers During the COVID-19 Pandemic In Compliance with Resolution M-4842

Purpose:

Pursuant to California Public Utilities Commission (“Commission”) Resolution M-4842, California American Water is filing this advice letter to (1) confirm that on March 19, 2020, California American Water filed Advice Letter 1284, which was approved, notifying the Commission it implemented the emergency customer protections adopted in D.19-07-015, and (2) to request exemptions from two customer protections that do not apply in this emergency.

Background:

On March 4, 2020, Governor Newsom declared a State of Emergency to help the state prepare for the spread of the COVID-19. Following the Governor’s declaration, California American Water received the Executive Director’s March 17, 2020 letter. The Executive Director’s letter states that the Commission “expect[s] the utilities and service providers subject to D.19-07-015 and D.19-08-025 to extend the same applicable customer protections directed in D.19-07-015 and D.19-08-025 to customers in response to the declared state of emergency due to the spread of the COVID-19.”¹ The letter further states that the protections will apply retroactively beginning March 4, 2020.

On March 19, 2019, in compliance with the Executive Director’s March 17, 2020 letter, California American Water filed Advice Letter 1284 to confirm implementation of protections to customers across all service areas during the emergency. Advice Letter 1284 was approved by the Commission on March 24, 2020.

On April 16, 2020, the Commission issued Resolution M-4842 requiring utilities to file a Tier 2 Advice Letter confirming activation of its Catastrophic Event Memorandum Account (“CEMA”) and the implementation of the customer protections adopted in D.19-07-015.

¹ In D.19-07-015, the Commission established a permanent set of minimum emergency disaster customer protection measures that the utilities are mandated to implement in the event of a declared emergency. D.19-08-025 does not apply to water utilities.

Ordering Paragraph 2 of Resolution M-4842 provides:

2. To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, electric, gas, communications, and water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter describing all reasonable and necessary actions to implement the emergency customer protections adopted in D.19-07-015 and D.19-08-025 to support California customers.

Additionally, the final paragraph within the Discussion of Resolution M-4842 provides as follows:

If the electric, gas, communication, and water corporations subject to this Resolution believe that specific provisions from D.19-07-015 and D.19-08-025 do not apply during the pandemic, they shall identify such provisions in their Advice Letters and provide a justification for why they believe the provisions do not apply.

COMPLIANCE WITH M-4842

On March 19, 2020, as noted above, California American complied with the Executive Director's Letter by notifying the Commission of CEMA activation and implementation of customer protections adopted in D.19-07-015. California American Water describes below its prior compliance and its request for an exemption from two provisions identified as not applicable to the current pandemic emergency.

Compliance with Executive Director's March 17, 2020 Letter

CEMA Activation

On March 19, 2020, California American Water filed Advice Letter 1284, which announced activation of California American Water's CEMA account for the COVID-19 emergency, effective March 4, 2020. In compliance with its CEMA tariff rules, on April 3, 2020, California American Water provided further information to the Executive Director, including a description of the effects of the emergency on our facilities as well as information on the estimated costs we expect to incur and track in CEMA.

Implementation of Customer Protections and Communications

In addition to notifying the Commission that California American Water activated its CEMA, Advice Letter 1284 confirmed implementation of the following protections adopted in D.19-07-015 for customers across all service areas during the emergency:

- Dunning locks to place a moratorium on discontinuing service shutoffs for non-payment
- Cease late payment fees
- Offer customer payment options for up to one year
- Restoration of service to previously shut-off customers
- Waive reconnection or facilities fees for affected customers and suspend deposits for affected customers who must reconnect to the system

California American Water also restored service to any active account (where the company could safely do so) that had been disconnected for non-payment prior to March 19, 2020.

The Company communicated these protections to customers through email, bill text message, press release, social media, office signage in English, Spanish and Chinese and on our website in English and Spanish. California American Water has also provided information to customers in all languages commonly spoken in California by mail. Additional bill text messages are now appearing on customer bills.

In addition to these customer protections, California American Water is launching additional communication efforts to inform residential customers about the availability of our Low-Income Rate Assistance (LIRA) program for those suffering from financial hardship. Additionally, the company has ceased removing customers from the LIRA program who fail to recertify their qualifications after the two-year enrollment ends. This protection will remain in place until at least June 30, 2020.

Requested Exemptions

In response to Resolution M-4842's requirement that utilities identify any customer protection that does not apply to the current emergency, California American Water does not believe that the following two disaster relief protections in D.19-07-015 apply to the current pandemic emergency:

(6) waive bills for victims who lost their homes or if their homes are rendered uninhabitable; and

(7) authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.

These protections are clearly for customers whose real property suffers damage or destruction during a wildfire, earthquake, flood or other disaster. The current pandemic emergency is viral and does not damage or destroy real property. Therefore, California American Water has not extended these protections to customers and has instead emphasized the pertinent relief available to customers during this emergency. California American Water requests that it be exempted from implementing these non-applicable protections.

Tier Designation:

This advice letter is submitted with a Tier 2 designation pursuant to General Order No. 96-B.

Effective Date:

California American Water requests an effective date of March 4, 2020.

Notice:

Pursuant to Section 4.3 of General Order No. 96-B, a copy of this advice letter is being provided to those entities listed in the attached 'SERVICE LIST PURSUANT TO SECTION 4.3 OF G.O.

NO. 96-B.” Per guidance from the California Public Utilities Commission’s Water Division, during the COVID-19 pandemic, advice letters will only be delivered electronically to the service list. Hardcopy advice letters will be mailed as soon as administrative staff are able to return to California American Water offices.

Protests and Responses:

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 grounds² 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 AL 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 that 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 to California American Water, addressed to:

Email Address:

Mailing Address:

² G.O. 96-B, General Rule 7.4.2

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Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform DWA, 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.

If you have not received a reply to your protest within 10 business days, please contact Vera Kostikova at (916) 568-4246.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Vera Kostikova

Vera Kostikova
Financial Analyst - Rates & Regulatory

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ADVICE LETTER 1294

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