

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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December 29, 2020

Jeffrey T. Linam
Vice President of Rates & Regulatory
California-American Water Company
4701 Beloit Drive
Sacramento, CA 95838-2434

Dear Mr. Linam,

The Commission has approved California-American Water Company's Advice Letter No. 1317, filed on December 3, 2020, regarding Conclusion of Emergency Disaster Relief Program for Kincadee Wildfire Residential Customer and Non-Residential Customer Protections Pursuant to Decision (D.) 19-07-015.

Enclosed is a copy of the advice letter with an effective date of December 3, 2020 for the utility's files.

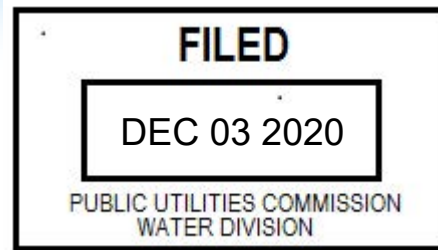
Please contact Bradley Leong at BL4@cpuc.ca.gov or 415-703-2307, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant
Water Division

Enclosures



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December 3, 2020

ADVICE LETTER NO. 1317

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: Conclusion of Emergency Disaster Relief Program for Kincadee Wildfire Residential Customer and Non-Residential Customer Protections Pursuant to Decision (D.) 19-07-015

Purpose:

Pursuant to California Public Utilities Commission (Commission) Decision (“D.”) 19-07-015, California American Water hereby notifies the Commission of the conclusion of its emergency customer protections to support residential customers and small businesses impacted by the Kincadee fire in Sonoma County.

Background:

On October 25, 2019, Governor Gavin Newsom issued a state of emergency for Sonoma County in response to the Kincadee fire, which was stoked by multiple high wind events. California American Water’s Geyserville service area was placed under a mandatory evacuation order on October 24, 2019 and our Larkfield service area was placed under a mandatory evacuation order on October 27, 2019. The evacuation orders were lifted on October 30, 2019. Thanks to the terrific defense mounted by firefighters and other first responders, we believe that none of our customers lost structures or property in during the fire. California American Water facilities did not sustain any damage either.

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. Ordering Paragraph 11 states:

10. 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.

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) 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:

Items 1, 2 and 3 - Protections Offered, Time Periods and Outreach Efforts

Following issuance of the Governor's emergency proclamation on October 25, 2019, and in accordance with D.19-07-015, California American Water offered customers in its Larkfield and Geyserville services areas impacted by the mandatory evacuations the following customer protections:

- Dunning locks through January 5, 2020
- Ceased late payment fees through November 8, 2019
- Offered customer payment options through the end of October 2020
- Worked with customers to adjust extraordinary water use due to the fires through March 1, 2020.

California American Water communicated these protections through letter, bill text message, press release, CodeRED, social media and our website in in English and Spanish, the languages commonly spoken in our service areas. We also provided abbreviated information to customers in other languages commonly spoken in California. These customer protections were announced through our CodeRED system and social media when the evacuation order was lifted on October 30, 2019, bill text messages appeared on customer bills in November and December 2019 and a press release was issued on November 7, 2019. A mailing to all customers went out the week of November 11, 2019.

Because California American Water was not aware of any damage to customer homes as a result of the Kincade Fire, it did not need to waive reconnection or facilities fees for affected customers and suspend deposits for affected customers who must reconnect to the system, waive bills for victims who lost their homes or if their homes are rendered uninhabitable, or

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.

During the fire event, California American Water staff communicated regularly with the Geyserville Fire Department about water system status and availability of water for firefighting efforts. California American Water also communicated with Sonoma Fire about the Larkfield system status and water availability when the Kindcade fire threatened the Larkfield and Santa Rosa area.

Items 4 & 5 - Customer Impacts & Metrics

Customer impacts

- California American Water's Geyserville service area was placed under a mandatory evacuation order on October 24, 2019 and our Larkfield service area was placed under a mandatory evacuation order on October 27, 2019. The evacuation orders were lifted on October 30, 2019.
- California American Water has approximately 2,350 customers in Larkfield and 313 customers in Geyserville.

Metrics

- Between November 1, 2019 and October 31, 2020, a total of 29 customers in our Larkfield and Geyserville service areas received extended payment plans. California American Water cannot, however, identify the percentage of payment plans that were requested as a result of the Kincadee fire.
- All active Larkfield and Geyserville customers had dunning locks placed on their accounts through January 5, 2020 for all active customers
- Ceased late payment fees through November 8, 2019 for all active Larkfield and Geyserville customers

Tier Designation:

This advice letter is submitted with a Tier 1 designation pursuant to General Order No. 96-B.

Effective Date:

California American Water does not request a specific effective date because this is a compliance filing that does not require any changes to California American Water tariffs.

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. 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 errors 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

In 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 us, addressed to:

Recipients: Kamilah Jones <i>Financial Analyst – Rates & Regulatory</i>	E-Mail: Kamilah.jones@amwater.com	Mailing Address: 4701 Beloit Drive Sacramento, CA 95838 Fax: (916) 568-4260
Sarah E. Leeper	sarah.leeper@amwater.com	555 Montgomery Street, Suite 816

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Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division, 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, contact this person at (916) 568-4232.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Kamilah Jones

Kamilah Jones
Senior Financial Analyst - Rates & Regulatory

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ADVICE LETTER 1317

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