

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 25, 2024

Jonathan Morse  
Sr. Manager Rates & Regulatory  
California-American Water Company  
520 Capitol Mall Ste. 630  
Sacramento, CA 95814

Dear Mr. Morse,

The Water Division of the California Public Utilities Commission has approved California-American Water Company's Advice Letter No. 1436, filed on January 5, 2024, regarding Emergency Protections - January Floods - Central Division – 12 month update.

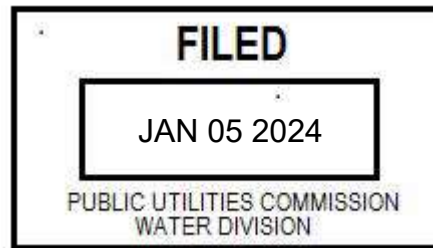
Enclosed is a copy of the advice letter with an effective date of January 4, 2024 for the utility's files.

Please contact Bradley Leong at [BL4@cpuc.ca.gov](mailto:BL4@cpuc.ca.gov) or 415-703-2307, if you have any questions.

Thank you.

Enclosures





January 5, 2024

ADVICE LETTER NO. 1436

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:** 12 Month Update of Emergency Disaster Relief Program for January 2023  
Floods for Residential Customer and Non-Residential Customer Protections  
Pursuant to Decision (D.) 19-07-015

**Purpose:**

California American Water submits this Tier 1 Advice Letter in compliance with Decision (D.) 19-07-015 issued by the California Public Utilities Commission (Commission) on July 19, 2019.

Ordering Paragraph 11 of D.19-07-015 provides:

All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service.), 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.

Ordering Paragraph 12 of D.19-07-015 provides:

All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, California American Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B Water utilities (Fruitridge Vista

Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service.) shall file a Tier 1 Advice Letter twelve months from a qualifying event, documenting the collaborative engagement they had with the Governor's Office of Emergency Services and the California Department of Forestry and Fire Protection demonstrating information sharing that aided these entities in carrying out their mission.

### **Background:**

On January 4, 2023, Governor Newsom issued a Proclamation of a State of Emergency due to severe winter storms.<sup>1</sup> On January 5, 2023, the County of Monterey began issuing evacuation orders for portions of Monterey County serviced by California American Water.<sup>2</sup> Then, on January 9, 2023, President Biden declared that an emergency exists in 17 California counties, including Monterey County.<sup>3</sup> The evacuation orders for portions of Monterey County serviced by California American Water were lifted on January 16, 2023.

### **Discussion:**

Following issuance of the Governor's emergency proclamation and the announcement of evacuation notices, and in accordance with D.19-07-015, California American Water activated its Catastrophic Event Memorandum Account (CEMA) effective to January 4, 2023, the time of the evacuation order.

California American Water filed Advice Letter 1403 on January 19, 2024 in compliance with D.19-07-015 and extended customer protections in Monterey County service areas impacted by the mandatory evacuations.

As stated in AL 1403, California American Water extended customers in its Monterey County services areas impacted by the mandatory evacuations the following customer protections:

- Dunning locks through March 4, 2023
- Cease late payment fees through March 4, 2023
- Offered customer payment options for up to one year
- Worked with customers to adjust extraordinary water use due to the storms

If customer homes were damaged as a result of the winter storms it also:

- waived reconnection or facilities fees for affected customers
- suspended deposits for affected customers who must reconnect to the system,
- waived bills for victims who lost their homes or if their homes are rendered uninhabitable, and
- authorized 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.

California American Water communicated these protections through letter in January, bill text messages in February and March, press release, social media and our website 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.

California American Water recorded approximately \$80,000 of costs associated with this event in the CEMA. As stated above, the costs recorded began January 4, 2023, the date of the Governor's proclamation. California American Water will seek recovery of these costs in a General Rate Case or other appropriate ratemaking proceeding. When California American files for recovery of costs related to the CEMA or other costs that will be recovered separately, California American Water will allocate those costs across all customer classes and all Districts in California.

California American Water files this advice letter in compliance with Ordering Paragraphs 11 and 12 of D.19-07-015.

**Effective Date:**

California American Water requests an effective date of January 4, 2024.

**Tier Designation:**

California American Water is also requesting an expedited advice letter treatment pursuant to the Commissions GO 96-B, requesting a waiver or a shortened protest and reply period of five days. This advice letter is submitted with a Tier 1 designation pursuant to General Order No. 96-B and D.19-07-015.

**Notice:**

This is a Tier 1 advice letter that does not require customer notification, as provided in Water Industry Rule 7.3.1 of General Order 96-B. 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 to interested parties having requested such notification. ***Please note that this advice letter will only be distributed electronically.***

**RESPONSE OR PROTEST<sup>1</sup>**

Anyone may submit a response or protest for this AL. 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 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<sup>2</sup> 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

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<sup>1</sup> G.O. 96-B, General Rule 7.4.1

<sup>2</sup> G.O. 96-B, General Rule 7.4.2

(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. When submitting a response or protest, **please include the utility name and advice letter number in the subject line.**

The addresses for submitting a response or protest are:

**Email Address:**

[Water.Division@cpuc.ca.gov](mailto:Water.Division@cpuc.ca.gov)

**Mailing Address:**

CA Public Utilities Commission  
Division of Water and Audits  
505 Van Ness Avenue  
San Francisco, CA 94102

On the same day the response or protest is submitted to DWA, the respondent or protestant shall send a copy of the protest to California American Water at:

**Email Address:**

[chase.grady@amwater.com](mailto:chase.grady@amwater.com)

**Mailing Address:**

520 Capitol Mall, Suite 630  
Sacramento, CA 95814

[sarah.leeper@amwater.com](mailto:sarah.leeper@amwater.com)

555 Montgomery Street, Suite 816  
San Francisco, CA 94111

[jonathan.morse@amwater.com](mailto:jonathan.morse@amwater.com)

520 Capitol Mall, Suite 630  
Sacramento, CA 95814

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.

**REPLIES**<sup>3</sup>

The utility shall reply to each protest and may reply to any response. Any reply must be received by DWA 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.

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<sup>3</sup> G.O. 96-B, General Rule 7.4.3

The actions requested in this advice letter are not now the subject of any formal filings with the California Public Utilities Commission, including a formal complaint, nor action in any court of law.

This filing will not cause the withdrawal of service, nor conflict with other schedules or rules.

If you have not received a reply to your protest within 10 business days, please contact Chase Grady at (916) 568-4241.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Chase Grady

Chase Grady  
Associate Rates & Regulatory Analyst

**CENTRAL DIVISION SERVICE LIST**  
**CALIFORNIA-AMERICAN WATER COMPANY**

**BY MAIL:**

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Monterey Regional Water Pollution  
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Monterey, CA 93940

City of Pacific Grove  
c/o Community Development Department  
Attention: Sarah Hardgrave  
300 Forest Ave., 2nd floor  
Pacific Grove, CA 93950

City of Sand City  
City Hall  
California & Sylvan Avenues  
Sand City, CA 93955  
Attn: City Clerk

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Monterey Peninsula Water Management  
District  
Chief Financial Officer  
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**CENTRAL DIVISION SERVICE LIST**  
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Clerk of the Board  
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