

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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October 28, 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. 1308, filed on September 15, 2020, regarding Wildfire Emergency Customer Protections.

Enclosed is a copy of the advice letter with an effective date of September 15, 2020 for the utility's files.

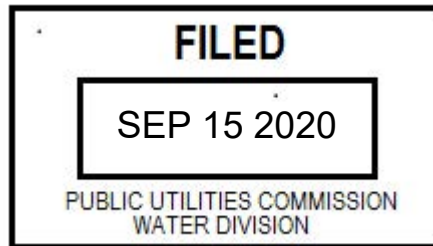
Please contact Bradley Leong at BL4@cpuc.ca.gov or 415-703-2307, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant
Water Division

Enclosures



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September 15, 2020

ADVICE LETTER NO. 1308

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: Implementation of Emergency Customer Protections Decision (D.) 19-07-015

California American Water submits this Tier 1 compliance filing consistent with Decision (“D.”) 19-07-015.

Background:

Since mid-August Governor Newsom has issued several state of emergency proclamations related to extreme heat and wildfire events throughout California.¹ Several of California American Water’s service areas have been impacted and may be impacted in the future as the wildfire season continues. For example, customers in California American Water’s Monterey service areas experienced evacuation warnings and orders. California American Water’s Geyserville, Hillview and Duarte service areas all have been or are subject to evacuation warnings.

In D.19-07-015, the Commission established a permanent set of minimum emergency disaster customer protection measures. Ordering Paragraphs 9 and 10 of D.19-07-015 provide as follows:

In the event the Governor of California or the President of the United States declares a state of emergency because a disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility service, all Class-A Water utilities ... shall file a Tier 1 Advice Letter within 15 days of the Governor’s or the President of the United States state of emergency proclamation reporting compliance with implementing this Decision’s mandated emergency customer protections and outreach activities.

10. All Class-A Water utilities ... shall track the associated costs with the emergency customer protections in the respective Catastrophic Event Memorandum Accounts and extend their applicability of those memorandum accounts to costs for implementing customer protections for all disasters in which the Governor of California or the President of the United States has declared a state of emergency. Catastrophic Event Memorandum Accounts or Emergency Customer Protections

¹ <https://www.gov.ca.gov/wp-content/uploads/2020/08/8.16.20-Extreme-Heat-Event-proclamation-text.pdf>;
<https://www.gov.ca.gov/wp-content/uploads/2020/08/8.18.20-Fire-State-of-Emergency-Proclamation.pdf>;
<https://www.gov.ca.gov/wp-content/uploads/2020/09/9.6.20-September-Fires-Emergency.pdf>.

Memorandum Account tariff language must specify that entries in the account will be segregated by qualifying event. Costs for emergency customer protection activities should be recovered across each utility's entire customer base and the water and sewer utilities stated above, shall make any necessary tariff changes in accordance with the advice letter procedures prescribed by General Order 96-B.

Consistent with D.19-07-015 California American Water has activated its CEMA and implemented the customer protections identified below. California American Water intends to record costs associated with these protections to its Catastrophic Event Memorandum Account.

Customer Protections:

California American Water has extended the following protections to impacted customers.

1. Activation of the CEMA (Catastrophic Event Memo Account). California American Water is evaluating the costs associated with these events. California American Water will activate the CEMA for these events as needed, and provide greater specificity about potential incremental costs, within the 30-day deadline provided in Preliminary Statement G (CEMA).
2. Make insurance claims on all costs and expenses incurred as a result of the fires, and credit insurance payments to their CEMA. If California American Water determines that there have been insured losses related to these events, California American Water will file insurance claims as appropriate. Any funds received as a result of such insurance claims will be credited to the CEMA.
3. Work cooperatively with affected customers to resolve unpaid bills and minimize disconnections for non-payment.
4. Waive reconnection or facilities fees for affected customers and suspend deposits for affected customers who must reconnect to the system.
5. Provide reasonable payment options to affected customers.
6. Waive bills for victims who lost their homes or if their homes were rendered uninhabitable.
7. Authorize a pro rata waiver of any fixed element of a water bill for the time the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.
8. Customer outreach regarding emergency disaster relief program. California American Water will provide appropriate information about its emergency relief protections to applicable customers consistent with its Disaster Relief Communications Plan, as submitted in Advice Letter 1258.

Thankfully, no California American Water customer has lost a home or had it damaged to the extent it became uninhabitable as a result of the recent wildfires. California American Water may nonetheless offer customers partial waiver of bills for customers whose water usage significantly exceeded (200% or more) their prior month's usage as a result of attempts to mitigate potential fire impacts.

Tier Designation:

This compliance advice letter filing 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 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:

Email Address:

ca.rates@amwater.com

sarah.leeper@amwater.com

Kamilah.jones@amwater.com

Mailing Address:

4701 Beloit Drive
Sacramento, CA 95838

555 Montgomery Street, Ste. 816
San Francisco, CA 94111

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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 Kamilah Jones at (916) 568-4232.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Jeffrey T. Linam

Jeffrey T. Linam
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ADVICE LETTER 1308

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