

ALISAL WATER CORPORATION

A California Corporation
dba ALCO WATER SERVICE

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XXXX XX, 2021

ADVICE LETTER NO. XXX Alisal Water Corporation dba Alco Water Service (U 206 W)

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Summary

Alisal Water Corporation, dba Alco Water Service, (“Alco”) hereby submits this Tier 2 advice letter in compliance with Resolution (Res.) M-4849, which was adopted by the California Public Utilities Commission (“CPUC” or “Commission”) at its February 11, 2021 voting meeting and issued the next day. In particular, this advice letter complies with Res. M-4849’s transition plan for the expiration of Emergency Customer Protections, currently scheduled to expire on June 30, 2021.

Background

On March 25, 2020, Alco filed its AL 195 responding to Alice Stebbins, the Executive Director of the Commissions letter dated March 17, 2020 regarding “applicable customer protections” from D.19-07-015 in response to the COVID-19 State of Emergency and notifying the Commission that, beginning March 4, 2020, Alco is recording all costs related to the customer protections and notifications identified in D.19-07-015 resulting from COVID-19 State of Emergency proclamation in its CEMA, including but not limited to, lost revenues due to customers’ inability to pay for their water service as a result of the COVID-19 State of Emergency, as well as all other costs related to the COVID-19 State of Emergency, including but not limited to customer notifications, as well as additional supplies and equipment necessary to comply with all COVID-19 requirements, measures and directives.

On April 16, 2020, Commission Resolution M-4842 ordered electric, gas, communications and Class A & B water and sewer corporations to implement a number of emergency customer protections and report their compliance to the Commission. On May 1, 2020 Alco Filed Advice Letter No. 196 (“AL 196”) in compliance with Res. M-4842 demonstrating Alco's compliance with applicable customer protection measures adopted in D.19-07-015 and D.19-08-025 with an effective date of March 4, 2020. On February 18, 2021, Alco filed Advice Letter No. 200 (“AL 200”) which demonstrated compliance with the extension of Emergency Customer Protections to June 30, 2021.

Transition Plan for the Expiration of Emergency Customer Protections

As of the date of this Tier 2 advice letter filing, Alco has experienced no “loss or disruption of the delivery or receipt of utility service” nor has the COVID-19 emergency “resulted in the degradation of the quality of utility service” (citations from Ordering Paragraph Number 9 of D.19-07-015).

Alco, via Advice Letter No. 195 (AL 195), applied the applicable customer protection measures adopted in D.19-07-015 and D.19-08-025 with an effective date of March 4, 2020. AL 196 was filed on May 1, 2020 in conformance with Res, M-4842 further demonstrating Alco's compliance with Emergency Customer Protections.

Further, Alco demonstrated compliance with the requirements of Resolution M-4849's with the extension of Emergency Customer Protections to June 30, 2021 through AL 200 filed on February 18, 2021.

Resolution M-4849 Ordering Paragraph 5 states:

5. Electric, gas, and water corporations subject to this Resolution shall each file Tier 2 Advice Letter with their transition plans for the expiration of Emergency Customer Protections by April 1, 2021. The transition plans shall include 1) a timeline of new start and resumed activities, 2) a marketing, education and outreach (ME&O) strategy, 3) an explanation of the activities timeline and ME&O strategy accounts for compliance and safety, and 4) a progress tracking and reporting plan. The goal of the transition plan is to proactively enroll customers in programs to manage their utility bills and inform relevant customers of the changes to programs they are already on, to effectively ease customers through a transition off of Emergency Customer Protections (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor's Executive Order N-42-20). Electric and gas corporations shall serve copies of the Advice Letters to R.18-03-011, A. 14-11-007, A.15-02-001, A.19-11- 003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19- 09-014 proceeding service lists, and the service list of any new proceeding established to Address Energy Utility Customer Bill Debt Accumulated During the Coronavirus Pandemic. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists.

Attached as **Exhibit A**, please find Alco's **Transition Plan for Expiration of the Emergency Customer Protections** (Transition Plan) in conformance with Ordering Paragraph 5 of Res. M-4849. This Plan incorporates all of the elements of a transition plan required by Res. M-4849. In addition, in compliance with Ordering Paragraph 6 of Res. M-4849, on February 25, 2021, Alco submitted its draft Transition Plan Advice letter to CPUC staff (Gillian.Weaver@cpuc.ca.gov), who was directed to share it with the LIOB.

This filing is made under the provisions of General Order No. 96-B and as directed by Resolution M-4849.

This filing will not cause withdrawal of service nor conflict with any other schedule or rule.

Tier Designation and Requested Effective Date

This advice letter is submitted with a Tier 2 designation pursuant to Ordering Paragraph 5 of Resolution M-4849 conveying Alco's Transition Plan for the Expiration of Emergency Customer Protections. This is a Tier 2 advice letter pursuant to General Order 96-B and Water Industry Rule 7.3.2.

Alco respectfully requests an effective date of April 1, 2021 for Advice Letter No. XXX, in compliance with Ordering Paragraph 5 of Resolution M-4849.

Notice

This is a Tier 2 compliance filing consistent with Ordering Paragraph 5 of Resolution M-4849. Water Industry Rule 3.2 of General Order 96-B indicates that this kind of compliance filing does not require customer notice. In accordance with General Rule 4.3 and 7.2 of General Order 96-B, a copy of this advice letter is being mailed to all parties listed on Alco's service list as well as the service lists for R.17-06-024 and R.18-03-011.

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 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 of the protest by mail or e-mail to us, addressed to:

<u>Recipients:</u>	<u>Email:</u>	<u>Mailing Address:</u>	<u>Fax:</u>
Thomas R. Adcock <i>President</i>	tom@alcowater.com	Alco Water Service 249 Williams Road Salinas, CA 93905	(831) 424-0611

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.

Replies: The utility shall reply to each protest and may reply to any response. Each reply must be received by the Division of Water and Audits within five business days after the end of the protest period, and shall be served on the same day to the person who filed the protest or response

Alisal Water Corporation
dba Alco Water Service (Alco)
(U 206 W)

By: /s/ Thomas R. Adcock
Thomas R. Adcock
President

**Alisal Water Corporation DBA Alco Water Service
Transition Plan for Expiration of the Emergency Customer Protections**

I. TRANSITION PLAN INTRODUCTION

Alisal Water Corporation dba Alco Water Service ("Alco") is a Class B water utility regulated by the California Public Utilities Commission ("CPUC" or "Commission") that owns and operates a water system in the eastern portion of Salinas California serving approximately 9,000 customers.

Alco provides public utility water service in accordance with its CPUC authorized tariffs, which include specific customer notification and disconnection practices relative to water service disconnections due to nonpayment. Effective February 1, 2020, in accordance with Senate Bill 998 ("SB 998"), Alco modified its Tariff Rule Nos. 1, 5, 6, 7, 8, 10 and 11 to reflect provisions from the addition of Chapter 6 to Part 12 of Division 104 of the California Health and Safety Code, also known as the Water Shutoff Protection Act. Alco's current CPUC authorized Rule No. 11 incorporates the SB 998 timeline requirements for customer notification and disconnection of water service due to nonpayment which also satisfy certain of the customer protections provided for in Commission Resolution M-4842.

History and Steps Alco has taken to protect our customers during the COVID-19 State of Emergency

On March 4, 2020 California Governor Gavin Newsome declared a statewide emergency due to an outbreak of a respiratory illness caused by COVID-19.

On March 12, Alco suspended all residential discontinuances of water service due to nonpayment during the pendency of the COVID-19 State of Emergency.

On March 13, 2020, the President of the United States also proclaimed a National Emergency in response to the COVID-19 pandemic¹.

On March 16, 2020, Governor Newsom issued an Executive Order requesting the Commission to monitor the consumer protections offered by both public and private utility providers in response to COVID-19 emergency.

On March 17, 2020, Alice Stebbins, the Executive Director of the Commission, issued a letter, subject to Commission ratification, to utilities requesting them to extend the "applicable customer protections" from D.19-07-015 to customers in response to the COVID-19 State of Emergency.

On March 19, 2020, in conformance with Resolution E-3238 and in accordance with Section P.1 of the Preliminary Statement of Alco's Tariff Book, Alco informed the Executive Director of the Commission that it had invoked its Catastrophic Event Memorandum Account (CEMA) and has

¹ <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>

started booking costs to the CEMA per the declaration of a State of Emergency by governmental authorities, starting as of March 4, 2020.

On March 25, 2020, Alco filed its AL 195 responding to Alice Stebbins, the Executive Director of the Commissions letter dated March 17, 2020 regarding “applicable customer protections” from D.19-07-015 in response to the COVID-19 State of Emergency and notifying the Commission that, beginning March 4, 2020, Alco is recording all costs related to the customer protections and notifications identified in D.19-07-015 resulting from COVID-19 State of Emergency proclamation in its CEMA, including but not limited to, lost revenues due to customers’ inability to pay for their water service as a result of the COVID-19 State of Emergency, as well as all other costs related to the COVID-19 State of Emergency, including but not limited to customer notifications, as well as additional supplies and equipment necessary to comply with all COVID-19 requirements, measures and directives.²

On April 2, 2020, Governor Newsom issued an Executive Order (N-42-20) requiring water systems to, during the COVID-19 State of emergency, suspend discontinuance of water service to residential customers for nonpayment and “to any business in the critical infrastructure sectors designated by the State Public Health Officer as critical to protect the health and well-being of all Californians that qualifies as a small business under 13 C.F.R. § 121.201 of the Small Business Administration's regulations”, and to “restore any residential service to occupied residences that has been discontinued for nonpayment since March 4, 2020”. The Governor also specified that “Nothing in this Order eliminates the obligation of water customers to pay for water service, prevents a water system from charging a customer for such service, or reduces the amount a customer already may owe to a water system.” This Order will remain in effect until the end of the declared State of emergency, consistent with Government Code Section 8567(b)³.

On April 16, 2020, Commission Resolution M-4842 ordered electric, gas, communications and Class A & B water and sewer corporations to implement a number of emergency customer protections and report their compliance to the Commission.

² Currently, to date, Alco has experienced no “loss or disruption of the delivery or receipt of utility service” nor has the COVID-19 emergency “resulted in the degradation of the quality of utility service”, (citations from Ordering Paragraph Number 9 of D.19-07-015).

Therefore, not all of the customer protections identified in D.19-07-015 are applicable to the current State of Emergency. Alco recognizes that, in order to slow or stop the spread of the COVID-19 virus, it is vital, during this National and State emergency, to maintain a safe, healthful, potable and continuous water service so that Alco’s customers may perform necessary frequent hand-washing, perform necessary cleaning and sanitizing of their household and environment, have running water to flush toilets and discharge wastewater, and have clean and potable water for cooking and drinking purposes.

³ 8567. (b) Orders and regulations, or amendments or rescissions thereof, issued during a state of war emergency or state of emergency shall be in writing and shall take effect immediately upon their issuance. Whenever the state of war emergency or state of emergency has been terminated, the orders and regulations shall be of no further force or effect.

On May 1, 2020, Alco filed its AL 196 in accordance with Commission Resolution M-4842, updating its applicable emergency customer protections.

On February 18, 2021, Alco filed its AL 200 in accordance with Commission Resolution M-4849 extending and reaffirming its applicable emergency customer protections.

Alco has coordinated with other similarly situated IOU water utilities in an effort to provide consistency among our Transition Plans. When developing this plan, Alco had the following objectives and Guiding Principles:

A. Transition Plan Objectives

- Reduce customers' anxiety about protections ending
- Effectively ease customers through a transition from COVID protections by implementing programs or initiatives, and enrolling customers in these programs/initiatives, to continue to assist them in bill management
- Proactively communicate with customers to inform them of changes in protections and help enroll them in programs to manage their bills

II. ACTIVITIES TIMELINE

Alco has been working with our customers throughout the COVID-19 State of Emergency to ensure that customers have access to safe and reliable water service. As stated above, Alco suspended all disconnections for nonpayment of water bills on March 12, 2020, prior to the requirement by the Governor's Executive Order N-42-20 issued on April 2, 2020. Alco has actively engaged with customers and offered customers differed payment plans (Extension Agreements), extended payment plans up to 12 months (Amortization Agreement) and referred them to charitable and/or government assistance programs. In preparation for the end of the COVID-19 State of Emergency and the "return to normal", Alco has put together this timeline for the "Resumption of Disconnections for Non-payment of Bills". Alco plans to continue to work with our customers to ensure a smooth transition from the moratorium on Disconnections for Non-payment of Bills.

A. Resumption of Disconnections for Non-Payment

- **NOTE:** Separately from the existing customer protections mandated by the Commission, Alco and other water utilities are also subject to an on-going moratorium on water service disconnections for non-payment imposed under Executive Order N-42-20. However, the timing of when the Executive Order N-42-20 moratorium may be lifted ("EO Moratorium Lifting Date") is uncertain and it is unclear how much notice water utilities may receive in advance of such a date. Therefore, the timeline for resumption of disconnections for non-payment set forth below is set around a "Disconnection Policy Resumption Date" on a future date to be determined by Alco, occurring at the soonest on the latter of July 1, 2021 or the EO Moratorium Lifting Date. This allows Alco adequate flexibility given the uncertainty in when or how the Executive Order N-42-20 moratorium may be lifted.

- **60 days prior to Disconnection Policy Resumption Date** – Alco will begin sending out notices to customers informing them that the water utility will resume applying standard disconnection procedures under its tariffs on a Disconnection Policy Resumption Date. The standard disconnection procedures are based on the timeline and requirements established by the Legislature under Senate Bill (“SB”) 998 (2018 Water Shutoff Protection Act) and incorporated into Alco’s tariffs.
- **Disconnection Policy Resumption Date** – Alco will resume standard disconnection procedures under the timeline established under SB 998 and will begin counting the 60-day period prohibiting disconnections mandated under Health & Safety Code § 116908(a)(1)(A) for bills that are delinquent (past the due date) as of the Disconnection Policy Resumption Date. Alco will individually reach out to each customer that has a delinquent bill as of the Disconnection Policy Resumption Date and will offer an opportunity to participate in an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment (the choice of which will be appropriate determined by Alco based upon the specific circumstances of the individual customer). If a customer is engaged in one of those types of payment assistance plans and is making timely payments under that plan, they will not be disconnected.
- **60 days after Disconnection Policy Resumption Date** – Alco may begin disconnecting customers for non-payment pursuant to the rules and procedures set forth under SB 998 and the applicable tariff rules. Prior to any disconnection for non-payment, Alco will provide advance noticing required by SB 998 as follows below. In addition, each notice provided will mention the alternative payment arrangements made available as part of the transition plan.
 - **At Least 7 Business Days Before Disconnection** – No less than seven business days before discontinuation of residential service for nonpayment, Alco shall contact the customer named on the account by telephone (if Alco has a valid telephone number available for that customer) or written notice pursuant to Health & Safety Code § 116908(a)(1)(A).
 - **At Least 10 Calendar Days Before Disconnection (If Applicable)** – For residential occupants where a Landlord-tenant relationship exists between residential occupants and owner, manager, or operator of the dwelling of an individually metered multi-unit complex who are not the customer of record, Alco will send written notice pursuant to Health & Safety Code § 116916(b) at least 10 calendar days prior to any possible disconnection.
 - **At Least 7 Calendar Days Before Disconnection (If Applicable)** – For residential occupants where a Landlord-tenant relationship exists between residential occupants and owner, manager, or operator of the dwelling of a detached single-family dwelling, Alco will send written notice of

termination pursuant to Health & Safety Code § 116916(f)(1) at least 7 calendar days prior to any possible disconnection.

B. Late Payment, Reconnection, or Other Customer Fees

- **June 1, 2021** – Alco will begin sending out written notices to all customers informing them that water utilities may resume applying the standard late payment, reconnection or other customer fee procedures under its tariffs on July 1, 2021.⁴
- **July 1, 2021**– Water Utilities may resume applying standard late payment, reconnection, or other customer fees to customer accounts.⁵

III. MARKETING, EDUCATION, AND OUTREACH STRATEGY

A. Target Audiences

- Alco’s Marketing, Education, and Outreach (“ME&O”) Strategy is intended to reach customers at large, with specifically targeted categories of customers as follows:
 - Customers enrolled in bill management programs
 - Customers with arrears
 - Customers that may qualify for disconnection preventions due to medical needs pursuant to SB 998

B. ME&O Activities for All Customers

- Alco will leverage ongoing communication channels to educate and engage customers about the June 30, 2021 expiration of Emergency Customer Protections enacted during the COVID-19 crisis; programs available to help customers maintain service; water efficiency and rebate programs that can help customers use less water, and therefore reduce their water bill; and where necessary, information about the extension of customer protections.
- Tools for implementation statewide, across all regulated water utilities, include bill insert and/or message, customer service talking points and training, phone message prompt (i.e. during welcome/on-hold messages), and office signage

C. Targeted Outreach

- In addition, Alco will undertake proactive outreach to targeted customers. Tools may include the following, as appropriate:
 - Phone calls targeted at specific audiences (if Alco has a valid telephone number available for those customers)
 - Emails or direct mail targeted at specific audiences (if Alco has a valid email address available for those customers)
 - Direct contact at customer residence (i.e. door tags)

⁴ Alco may resume applying those CPUC authorized tariff fees that were suspended per its AL 196 filed May 1, 2020.

⁵ Ibid.

- Materials in multiple languages (according to customer demographics)
- Targeted outreach will convey the following information, as appropriate:
 - Payment plans and options available to help customers maintain service or manage arrearages
 - Application of late-payment, reconnection, and other fees to a customer
 - Noticing of risk of disconnection
 - Information about qualifying for disconnection preventions due to medical needs pursuant to SB 998 and Alco’s Tariff Rule No. 11.

D. Partnerships

- **Partnership Activities By Individual Water Utilities** – Alco, like other regulated water utilities, will seek to identify and partner with community-based and other organizations that regularly interact with targeted audiences to expand our outreach program. This includes, as directed in Resolution M-4849, seeking to partner with the California Department of Community Services and Development and their local service providers to leverage their customer interactions for expanding outreach efforts on bill management programs. Alco currently provides customers needing financial assistance with contact information for a number of local charities that may be able to assist the customer with their utility bills.

IV. COMPLIANCE AND SAFETY

Alco is a Class B water utility and, in accordance with its tariff rules, offers payment plan options to customers. Alco offers customers "Extension Agreements" that provide the customer additional time to make a payment if they are not able to make a payment by their scheduled due date. Also offered are "Amortization Agreements" that will amortize a customer's past due bill over a period of time. Alco does not have any specific enrollment targets for these programs and they are available outside of the Emergency Customer Protections.

A. Alignment with Program Enrollment Targets and Requirements

At the beginning of the State of Emergency, Alco implemented a number of customer protections and other actions it had taken to inform its customers about those protections. Alco informed the Commission of these protections and notifications via AL 195. These protections included the suspension of disconnections for nonpayment during the pendency of the COVID-19 State of Emergency, extended payment plan options for customers, and Alco’s availability to address individual customer concerns and issues as needed. Alco has maintained a Customer Service staff presence in its office who are receiving calls and assisting customers in a safe manner, consistent with the current health directives and maintaining social distancing. Additionally, Alco has continued to maintain its service technicians and crews to be available for routine maintenance, response to emergencies, and customer service as needed throughout its water system.

Customers were notified of these protections via press releases, meetings with state and local elected officials, bill inserts to all customers, notices posted in the utility's office and via telephone or in-person conversations with customer service representatives.

On April 16, 2020, the Commission issued Res. M-4842 ordering electric, gas, communications and Class A & B water and sewer corporations to implement a number of emergency customer protections and report their compliance to the Commission. On May 1, 2020, Alco filed its AL 196 which incorporated the customer protections outlined in AL 195 as well as specifically demonstrating its compliance with M-4842.

On February 11, 2021, the Commission issued Res. M-4849 which extended the Emergency Customer Protections through June 30, 2021. In response, Alco filed its AL 200 on February 18, 2021 demonstrating its continued compliance with the Emergency Customer Protections and the extension of such protections through June 30, 2021 as outlined in M-4849.

When the Emergency Customer Protections outlined in Res. M-4849 expire on June 30, 2021, the Governor's Executive Order N-42-20 that implemented the moratorium on residential and small business water service disconnections may still be in place. Alco has and will continue to maintain its moratorium on disconnections for nonpayment and adjust its Disconnection Policy Resumption Date timeline as outlined above. This extension of the suspension of disconnections due to nonpayment will continue until such time as the Governor has ended the moratorium prescribed by Executive Order N-42-20 or has lifted the COVID-19 State of Emergency.

Additionally, when the Emergency Customer Protections expire, Alco's customers still have a number of protections as provided in its tariff rules, including those protections provided by SB 998. Section 1 of SB 998 outlines the intent of the Legislature. Specifically, section 1(b) states that "[i]t is the intent of the Legislature to minimize the number of Californians who lose access to water service due to inability to pay." Section 1(f) also provides that "[i]t is the intent of the Legislature that this act provide additional procedural protections and expand upon the procedural safeguards contained in the Public Utilities Code and Government Code as of January 1, 2019, relating to utility service disconnections." Through Advice Letter No. 194 ("AL 194"), Alco carefully evaluated its existing tariff rules, policies and procedures relating to disconnection of water service, and updated them to ensure compliance with the requirements of SB 998 effective February 1, 2020.

As specified in Alco's tariffs, a customer has 19 days after the bill for service has been mailed before the bill becomes past due. After a customer's bill becomes past due, the water service cannot be shut off for at least 60 days. Residential customers will be provided a Notice of Discontinuance of Service at least 7 business days prior to any disconnection. When an owner, manager or operator is listed as the customer of record by the utility, the utility will provide notice to the residential customers of the discontinuance of service as outlined in Alco's tariff rules.

Additionally, a customer may petition the utility for review, appeal the bill to the Commission, initiate a complaint with the Commission, or enter into an Extension Agreement or Amortization Agreement with the utility.

B. Ensuring that Activities are Safe and Consistent with All Appropriate State and Local Health Orders

Alco has maintained compliance with all State and Local Health Orders and will continue to meet the requirements of those Orders. Below is a sample of some of the safety precautions and protocols that the utility has undertaken to ensure the safety of our employees and customers.

Actions Taken to Protect the Health and Safety of Employees and Customers

- Increasing frequency and intensity of cleanings and disinfection of facilities and equipment.
- Limiting meeting sizes.
- Providing soap, hand sanitizers, disinfecting wipes, gloves, masks and other safety equipment and materials in all common areas and field trucks.
- Frequently communicating with employees on developments, company updates, social distancing measures and personal hygiene best practices.
- Requiring employees who are sick or who have concerns regarding potential exposure to COVID-19 to stay at home to comply with local shelter in place requirements and to protect other employees, customers and the public.
- Working with local health officials and emergency personnel to advise Alco and ensure the utility takes all appropriate steps to support a healthy workforce and community.
- Requiring all employees to wear appropriate protective gear, including face coverings, gloves (when necessary), etc. at all times when in the presence of other people.
- Limiting the number of customers allowed in Alco’s office lobby at any given time to 4.
- Posting signage requiring social distancing of a minimum of 6 feet between people, for both customer and employees.
- Posting signage requiring the wearing of face coverings at all times in Alco’s office, at its drive-up payment window, or in the field when in the presence of other people.

V. PROGRESS TRACKING AND REPORTING

A. Metrics to Track Enrollments of Impacted Customers in New Payment Programs

- Alco will provide the following metrics to track enrollments of impacted customers in new payment programs.
 - Number and percentage of customers enrolled in alternative payment arrangements (defined as enrollment in an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment).
 - Number and percentage of customers that are disconnected.
 - Change in arrearage amounts.
 - Number of customer complaints concerning alternative payment arrangements.