



4701 Beloit Drive  
Sacramento, CA 95838  
[www.amwater.com](http://www.amwater.com)

P (916)-568-4251  
F (916) 568-4260

April 1, 2021

ADVICE LETTER NO. 13XX – **February 25, 2021 LIOB DRAFT**

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.

**Purpose:**

As directed by California Public Utilities Commission (“Commission”) Resolution M-4849, California American Water is filing this advice letter to present a transition plan associated with discontinuance of the “Emergency Customer Protections” after June 30, 2021.

**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 a letter from the Commission’s Executive Director dated March 17, 2020. 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.”<sup>1</sup> 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 and the implementation of the applicable emergency customer protections adopted in D.19-07-015.

On May 1, 2020, California American Water filed Advice Letter 1294 to confirm and describe compliance with the Executive Director’s Letter and Resolution M-4842. Advice Letter 1294 was approved by the Commission on September 22, 2020.

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<sup>1</sup> 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.

On February 11, 2021, the Commission issued Resolution M-4849 to extend the emergency customer protections through June 30, 2021. Resolution M-4849 directed Class A water utilities to file a Tier 1 Advice Letter to describe actions taken to extend the Emergency Customer Protections through June 30, 2021. In compliance, California American Water filed Advice Letter 1323 on February 19, 2021.

**Transition Plan for the Expiration of Emergency Customer Protections:**

In addition to the above, Resolution M-4849 directed Class A water utilities to file a Tier 2 Advice Letter outlining their transition plans associated with discontinuance of the “Emergency Customer Protections” after June 30, 2021.

Resolution M-4849, Discussion Section II, provides in relevant part as follows:

After the customer protection period expires, the electric, gas, and water corporation subject to this Resolution will return to implementing programs and utility service as per the non-emergency state Commission decision directives.

To facilitate a smooth transition for customers when the Emergency Customer Protections are lifted, each electric, gas, and water corporation subject to this Resolution shall file a Tier 2 Advice Letter with its transition plan, or “Transition Plan Advice Letter,” by April 1, 2021. These IOUs shall design the transition plan to effectively ease customers through a transition off of the Emergency Customer Protections by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled.

The transition plan shall include 1) the timeline of new activities and resumed activities, 2) a marketing, education, and outreach (ME&O) strategy, 3) an explanation of how the activities timeline and ME&O strategy account for compliance and safety, and 4) a progress tracking and reporting plan.

California American Water outlines its Transition Plan in Workpaper 1-1, attached to this Advice Letter.

**Tier Designation:**

This advice letter is submitted with a Tier 2 designation.

**Effective Date:**

California American Water requests an effective date of May 1, 2021.

**Service List:**

In accordance with Section 4.3 of General Order 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.” Copies will also be served to R.18-03-011 and R.17-06-024 proceeding service lists. 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 CAW offices. Copies of the detailed workpapers and the documents supporting this Advice Letter have also been furnished to the Commission.

### **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 grounds<sup>2</sup> 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, 3<sup>rd</sup> floor  
California Public Utilities Commission,  
505 Van Ness Avenue, San Francisco, CA 94102  
[water\\_division@cpuc.ca.gov](mailto: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:**

[vera.kostikova@amwater.com](mailto:vera.kostikova@amwater.com)

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

[ca.rates@amwater.com](mailto:ca.rates@amwater.com)

**Mailing Address:**

4701 Beloit Drive  
Sacramento, CA 95838

555 Montgomery Street, Suite 816  
San Francisco, CA 94111

4701 Beloit Drive  
Sacramento, CA 95838

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 Vera Kostikova at (916) 568-4246.

CALIFORNIA-AMERICAN WATER COMPANY

*/s/ Vera Kostikova*

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Vera Kostikova  
Financial Analyst - Rates & Regulatory

# Workpaper 1-1

## **Resolution M-4849**

### **California-American Water Company Transition Plan – LIQB DRAFT**

#### **I. TRANSITION PLAN INTRODUCTION**

California-American Water Company (“California American Water”) appreciates the Public Utilities Commission’s (“Commission”) continued interest both in protecting customer access to safe and reliable drinking water and in the financial stability of the water utilities it regulates during this time. Under the emergency customer protections adopted by the Commission, customers have access to safe, clean, reliable water. The corresponding post-moratorium impact to all customers as a result of higher bills and possible higher bad debt expense must, however, be taken seriously. California American Water’s Transition Plan is an important step towards addressing that post-moratorium impact on customers.

#### **A. California American Water’s Implementation of Emergency Customer Protections**

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, the Commission’s Executive Director issued a letter dated March 17, 2020 stating 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.”

On March 19, 2020, 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 2, 2020, Governor Newsom issued Executive Order N-42-20 prohibiting residential service disconnections and disconnections 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... .”

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. On May 1, 2020, California American Water filed Advice Letter 1294 again confirming implementation of

## **California-American Water Company Transition Plan – LIOB DRAFT**

emergency customer protections in compliance with M-4842. Advice Letter 1294 was approved by the Commission on September 22, 2020.

As stated in Advice Letter 1284 and 1294, California American Water implemented the following customer protections adopted in D.19-07-015 and as required by Governor Newsom's Executive Order N-42-20:

- 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

In addition to the above protections, 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.

California American Water 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.

California American Water also launched additional communication efforts to inform residential customers about the availability of our Customer Assistance Program for those suffering from financial hardship.

California American Water additionally held several webinars to walk customers through its customer assistance programs. Customers can access the recording on California American Water's customer assistance program webpage at:  
<https://www.amwater.com/caaw/Customer-Service-Billing/customer-assistance-programs>.

### **B. California American Water's Transition Plan Objectives & Principles**

On February 11, 2021, the Commission issued Resolution M-4849 requiring electric, gas and water corporations to file an Advice Letter with a Transition Plan for the expiration of

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“Emergency Customer Protections.” Pursuant to Resolution M-4849, the Transition Plan must include:

- a timeline of activities associated with programs that assist customers in bill management,
- a marketing, education, and outreach plan to engage and enroll customers in new bill management program and any changes to existing emergency customer protections,
- how the Transition Plan maintains alignment with program enrollment targets, program eligibility requirements, and additional customer protections, and
- a plan for reporting progress on activities in the timeline and metrics to track and report the goal of effectively easing customers through the transition.

In compliance with Resolution M-4849, California American Water submits the following Transition Plan. California American Water used the objectives and guiding principles identified below to inform its Transition Plan.

### **A. Transition Plan Objectives**

- Reduce customers’ anxiety about protections ending
- Effectively ease customers through a transition from COVID emergency 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 the emergency protections and help enroll them in programs to manage their bills

### **B. Transition Plan Guiding Principles**

- Easy and effortless customer experience
- Easy to operationalize
- Focus on affordability
- Engage stakeholders and customers

## **II. ACTIVITIES TIMELINE**

Resolution M-4849 provides that “The IOUs’ transition plans shall map out a timeline of activities associated with programs or initiatives that assist customers in bill management.”



## **California-American Water Company Transition Plan – LIOB DRAFT**

The following includes both (1) a timeline for the resumption of standard activities that California American Water had suspended due to the Emergency Customer Protections in place and (2) a timeline for new activities that California American Water will implement to provide a smooth transition for customers.

### **A. Summary of General Steps Mandated under Resolution M-4849**

- **February 11, 2021** – Resolution M-4849 adopted by the Commission.
- **February 22, 2021** – California American Water files Tier 1 Advice Letter demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021.
- **February 25, 2021** – California American Water submits draft Transition Plan Advice Letter to the Commission.
- **March 11, 2021** – LIOB discusses water utility draft transition plans during its quarterly meeting.
- **April 1, 2021** – California American Water submits final Transition Plan Advice Letter that incorporate feedback from LIOB and the Commission’s Water Division staff. The water utility begins implementing the ME&O Strategy activities outlined in Section III below.

### **B. Resumption of Disconnections for Non-Payment**

As noted above, separate from the existing Emergency Customer Protections mandated by the Commission, 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” (i.e. a future date to be determined by each individual water utility) occurring the earliest of July 1, 2021 or the date Executive Order N-42-20 is lifted.

- **Notice of Disconnection Policy Resumption Date** – California American Water will begin sending out notices to customers informing them that California American Water will resume applying standard disconnection procedures under its tariffs on a Disconnection Policy Resumption Date. The disconnection notice procedures are based on the timeline and requirements established by the Legislature under Senate Bill (“SB”) 998 (2018 Water Shutoff Protection Act).

**California-American Water Company Transition Plan – LIOB DRAFT**

- **Disconnection Policy Resumption Date** – California American Water 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. California American Water will reach out to customers that have 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 determined by California American Water 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** – California American Water 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, California American Water will provide advance noticing required by SB 998 as set forth 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, California American Water shall contact the customer named on the account by telephone or written notice pursuant to Health & Safety Code § 116908(a)(1)(A).
  
  - **At Least 10 Calendar Days Before Disconnection (If Applicable)** – For residential occupants of individually metered multi-unit complexes who are not the customer of record, California American Water will provide 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 detached single-family dwelling, California American Water will send

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

**C. Certification of Eligibility for Customer Assistance Program (CAP)**

- **Prior to Disconnection Policy Resumption Date** – California American Water will launch a CAP enrollment campaign to encourage all of its eligible (but not yet participating) customers to enroll in the program. The CAP eligibility verification and recertification requirements remain unchanged and allow customers to conveniently enroll without required income verification.

**D. Late Payment, Reconnection, or Other Customer Fees**

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

**III. MARKETING, EDUCATION, AND OUTREACH STRATEGY**

Resolution M-4849 provides that “The IOUs shall include a coordinated, effective, and efficient strategy for their marketing, education, and outreach plan to engage and enroll customers in new bill management programs, to inform customers already enrolled in programs about changes due to the Emergency Customer Protections being no longer in effect after June 30, 2021 (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor’s Executive Order N-42-20), and to inform customers of the extension of the customer protections, where necessary.”

The following Marketing, Education, and Outreach (“ME&O”) Strategy supports the Transition Plan in effectively easing customers through a transition off of the Emergency Customer Protections (and the future expiration of the disconnection moratorium in the Governor’s Executive Order N-42-20) by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled. The Strategy was developed with a customer-impact lens and is part of a coordinated and effective marketing, education and outreach program.

## **California-American Water Company Transition Plan – LIOB DRAFT**

California American Water has developed a ME&O campaign strategy that supports the goals of the Transition Plan. The strategy includes expanded outreach to targeted and general audiences about programs and services available to customers prior to the lifting of the moratorium as well as targeted communications to customers identified as target audiences before and after the moratorium is lifted, but prior to the resumption of actual disconnections for non-payment. Attachment A to this Transition Plan is a timeline of California American Water's proposed customer outreach.

The goal of the Transition Plan is to limit the number of disconnections by providing resources necessary to support customers. At this time it is estimated that this may result in \$125,000 in additional costs to California American Water, which will be recorded and recovered through its CEMA account. This estimate is based on continual, targeted communication tactics delivered to California American Water's arrears-affected customers, as well as consistent, statewide communications promoting our different customer assistance plans.

### **A. Target Audiences**

- The 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 on assistance programs

### **B. ME&O Activities for All Customers**

- California American Water will leverage ongoing communications channels to educate and engage customers of the June 30, 2021 expiration of Emergency Customer Protections enacted during the COVID-19 pandemic; programs available to help customers maintain service; eligibility for disconnection preventions due to medical needs pursuant to SB 998 and California American Water Tariff Rule 11; 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 inserts, customer service talking points and training, phone message prompt (i.e. during welcome/on-hold messages), and office signage (when reopened to the public).

### **C. Targeted Outreach**

- In addition, California American Water will undertake proactive outreach to targeted customers. Tools may include the following, as appropriate:
  - Phone calls (automated or manual) targeted at specific audiences
  - Emails or direct mail targeted at specific audiences
  
- Targeted outreach will convey the following information, as appropriate:
  - Senate Bill (SB) Information about pending changes to a customer’s service or program enrollment status
  - Needed customer actions, including re-certifications, to remain eligible for programs
  - Payment plans and options available to help customers maintain service or manage arrearages
  - Bill assistance programs
  - 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

### **D. Additional ME&O Activities and Tools by Class A Companies**

- Additional channels for customer communication and targeted outreach that may be undertaken by California American Water, as resources allow, include:
  - Company web site
  - Social media
  - News releases to local media
  - Virtual community meeting
  - Direct contact at customer residence (i.e. door tags)
  - Materials in multiple languages (according to customer demographics)
  - Advertising (print, social media, or other)

### **E. Partnerships**

- **Partnership Activities By Individual Water Utilities** – 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.

- **Industry-wide Partnership Activities** – The California Water Association may also help to coordinate the following additional potential avenues and partnerships:
  - The California Special Districts Association (CSDA) and their local service providers to promote programs offered by local regulated water utilities.
  - An additional data exchange with energy investor-owned utilities in 2021—increasing the total to three times this year—to identify potential customers who could benefit from water utility assistance programs.
  - Seeking partnerships with diverse suppliers to assist regulated water utilities in implementing customer ME&O activities and tools.

#### **F. Incremental ME&O Costs**

- Resolution M-4849 provides that “If an IOU estimates that it cannot both comply with this Resolution and maintain compliance with existing Decision mandates leveraging only existing authorized budgets, it shall note in its Advice Letter the cost estimate, with details of the incremental new activity, and use the memorandum account to record and track incremental costs associated with transition plan implementation.”
- California American Water does not have approved dollars to implement its proposed ME&O activities using the existing Commission authorized revenue requirement. Therefore, California American Water proposes to record the expenses to the CEMA for potential future recovery.

#### **IV. COMPLIANCE AND SAFETY**

Resolution M-4849 provides that “Each IOU must explain in their Transition Plan Advice Letter how the transition plan maintains alignment with program enrollment targets, program eligibility requirements, and customer protections in effect outside Emergency Customer Protections (e.g., bans on requirements that energy customers pay a deposit to enroll in 12-month payment plan) established by Commission Decisions for relevant programs as outlined in Section 1, Activities Timeline.”

**A. Alignment with Program Enrollment Targets and Requirements**

- As set forth above, California American Water filed Advice Letters 1284 and 1294 implementing applicable emergency customer protections identified D.19-07-015 in response to the Executive Director’s March 17, 2020 letter and Resolution M-4842. Specifically, California American Water implemented the following Emergency Customer Protections identified in D.19-07-015<sup>1</sup> and will continue to implement them through June 30, 2021 as directed by Resolution M-4849:
  - a. 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.
  - b. Insurance Claims. California American Water put its insurer on notice of the COVID-19 pandemic. At this time, California American Water is not aware of any losses that are covered by its insurance.
  - c. Work Cooperatively with Affected Customers. California American Water has worked cooperatively with its customers to resolve unpaid bills. As stated above in Section I.A., California American Water has communicated the emergency customer protections to its customers through email, bill text messages, 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

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<sup>1</sup> In Advice Letter 1294, which was approved by the Commission on September 22, 2020, California American Water requested an exemption from implementing two disaster relief protections in D.19-07-015: (1) waive bills for victims who lost their homes or if their homes are rendered uninhabitable, and (2) 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.

in all languages commonly spoken in California by mail. In addition, California American Water has mailed reminders to customers who are past due on their bills that they may contact California American Water customer service to arrange for full or partial payments or to make arrangements for payment plans that are tailored directly to the customer needs. There have been no disconnections for nonpayment during the COVID-19 pandemic emergency.

- d. Waiver of Reconnection or Facilities Fees. California American Water has not charged customers reconnection or facilities fees and suspended collection of deposits for customers that must reconnect to the system.
  - e. Provide Reasonable Payment Options. California American Water has provided a menu of payment options to customers, including payment plans.
- California American Water also implemented the following emergency customer protections in addition to those mandated by Resolution M-4842:
    - As stated above, Executive Order N-42-20 implements a moratorium on residential and small business water service disconnections for non-payment. That moratorium and the other customer protections therein will continue to be in place even when the Commission’s Emergency Customer Protections are lifted. In compliance with N-42-20, California American Water has not disconnected any customers for nonpayment since March 4, 2020.
    - On February 1, 2020 the Water Shut-off Protection Act (SB 998) went into effect. SB 998 mandates certain requirements and procedures with respect to disconnections even when the Commission’s Emergency Customer Protections are lifted. On December 20, 2019, California American Water submitted Advice Letter 1276 requesting revisions to its tariffs to incorporate the new provisions of SB 998 into its Tariffs. California American Water submitted a supplemental filing, Advice Letter 1276-A on January 21, 2020, to clarify an issue related to its fee for



service reconnections. On July 28, 2020, the Commission approved Advice Letter 1276-A.

The timeline for the resumption of disconnections for non-payment stated above in Section II meets the requirements of SB 998 and the water utility's tariffs because it provides for (1) disconnections for non-payment to resume 60 days after the Disconnection Policy Resumption Date, and (2) provision of required notices before any disconnection.

- California American Water cannot project future disconnections, however as provided in California American Water's February 16, 2021, *Monthly Reporting in Response to Requests for COVID-19 Data*, submitted in R.17-06-024, there are approximately 25,700 customers or 13.8% of customers delinquent on their bills.<sup>2</sup>

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

- At California American Water, the health and safety of our customers, communities and employees is our top priority. California American Water implemented its business continuity plan for pandemic in January 2020. Numerous actions were taken to protect employees and customers through COVID-19 safety protocols across its operations including, for example, social distancing practices, face covering requirements, daily health screening procedures, sanitizing practices, employee communications, and mandatory trainings. California American Water also communicates its safety protocols and practices to customers as appropriate during routine and emergency work in the field. County level COVID restrictions are tracked and applied. California American Water's Director of Health and Safety holds regular meetings of operations staff representing all districts to discuss latest developments statewide and in California American Water's multiple districts. Additionally, California American Water has extended its work from home directive, for those who are able,

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<sup>2</sup> Estimate is based off the three-month average number of customers past due for November and December 2020 and January 2021. All potential disconnections are subject the SB 998 requirements and California American Water tariffs approved in Advice Letter 1276-A.

through the end of July 2021. California American Water will continue to assess this date and adapt as the situation develops.

**V. PROGRESS TRACKING AND REPORTING**

Resolution M-4849 provides that “IOUs must include a plan for reporting progress on activities in the timeline, and present metrics they will track and report to monitor success in achieving the goal of effectively easing 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) by proactively enrolling customers in programs to manage their utility bills and informing relevant customers of the changes to programs in which they are already enrolled. Reporting frequency shall be monthly and the first report shall include baseline data associated with progress metrics.”

**A. Background and Protocols for Progress Tracking and Reporting**

- California American Water has been and will continue providing monthly data reports regarding customers arrearages as part of the water low-income rate assistance rulemaking proceeding R.17-06-024.
- California American Water will continue to track and report the following metrics as part of R.17-06-024 and submit copies to Water Division until directed otherwise in that proceeding:
  - a. Number of customers requesting bill assistance
  - b. Number of newly enrolled customers to your low-income rate assistance program
  - c. Number of overall enrolled customer in your low-income rate assistance program
  - d. Number of customers late or behind on their bill
  - e. Average arrearage amount
  - f. Median arrearage amount
  - g. Range of arrearage amount
  - h. Overall arrearage amount
  - i. Number of customers making partial payments
- Additionally, California American Water will track and report the following metrics outlined below as part of the monthly data reports submitted in rulemaking proceeding R.17-06-024. California American Water will track and

report such information on a monthly basis for 12 months following the end of the Commission-mandated Emergency Customer Protections (i.e., through June 30, 2022). To the extent feasible and available, California American Water will report each metric on a monthly basis going back to February 2020 before the Emergency Customer Protections were implemented.

- For the purpose of these metrics, enrollment in the respective CAP programs should be defined as customers being billed pursuant to the respective utility CAP tariffs.

**B. Metrics to Track Continued Enrollment in CAP**

- California American Water will provide the following metrics to track that customers that enrolled in a bill assistance program when Emergency Customer Protections were in place are successful in sustaining their enrollment in the program if they still meet eligibility criteria.
  - Number and percent of newly enrolled customers that are able to stay on the water utility CAP program post June 30, 2021.
  - Number and percent of customers required to take actions to remain on California American Water’s CAP program (e.g., recertification, post enrollment verification) that successfully complete those actions.

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

- California American Water will provide the following metrics to track enrollments of impacted customers in new payment programs.
  - Number 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).
  - Dollar amount of payments made pursuant to a payment plan and remaining balance for unique customers enrolled in payment plans.
  - Number of unique customers more than 90 days in arrears by ZIP code and as a percentage of all unique accounts in the ZIP code.

# ATTACHMENT A

## February 25, 2021 LIOB Draft

### CA COVID Protections Ending - Education and Outreach Calendar

**Goals:**

- Enroll Customers in bill management programs (installment plans)
- Educate customers about current customer assistance programs
- Educate customers about multiple ways to pay bill
- Inform current enrollees about program changes starting 7/1
- Inform customers of any customer protection extensions

**Timing:** Based on 7/1 program changes. +60 Days to Disconnect

	March	April	May	June	July	August	
<b>Statewide:</b>	Customer Assistance	Customer Assistance	Customer Assistance	Customer Assistance	Customer Assistance	Customer Assistance	
	Payment Options	Payment Options	Payment Options	Payment Options	Payment Options	Payment Options	
<b>Tactics:</b>	Variable Content on Bills (Onserts, Zone 3), Email, Social Media, Website, News Release, NPR Advertising						
<b>Affected Customers:</b>				Program Changes	Program Changes	Program Changes	
				Program Extensions	Program Extensions	Program Extensions	
				Additional Enrollment	Additional Enrollment	Additional Enrollment	
<b>Tactics:</b>	Targeted Direct Mail, Targeted Email, Targeted Text, Social Media, Website						
<b>Billing/SAP Communication:</b>	Courtesy Past Due Letter running currently; SAP-Generated Letters about program changes in August (possible)						