



_____, 2021

DRAFT

California Public Utilities Commission
Water Division
Room 3102
505 Van Ness Avenue
San Francisco, CA 94102-3298

Advice Letter No. XXX

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Del Oro Water Company, Inc., on behalf of All Districts (DOWC) respectfully submits this Tier 2 Advice Letter in compliance with Resolution (Res.) M-4849, which was adopted by the California Public Utilities Commission (Commission) at its February 11, 2021 voting meeting and issued the next day. This Advice Letter complies with Res. M-4849's directive to include its Transition Plan associated with discontinuance of the Emergency Customer Protections after June 30, 2021.

Attached is Exhibit A which is the DOWC Resolution M-4849 Transition Plan.

No Effect on Water Service

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

Notice

Customer Notice: This is a Tier 2 compliance filing consistent with Water Industry Rule 7.3.1(3). Water Industry Rule 3.2 of General Order 96-B indicates that this kind of Tier 2 filing does require customer notice. All DOWC customers will be noticed.

Service List: In accordance with General Order 96-B, General Rules 4.3 and 7.2, and Water Industry Rule 4.1, a copy of this advice letter will be mailed or electronically transmitted on _____, 2021 to DOWC's Advice Letter service list, as well as the service lists for R.17-06-024 and R.18-03-011.



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Response or Protest

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 object 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 the 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;
- (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 re-litigating a prior order of the Commission.)

A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

Comments should mention that they pertain to **Del Oro Water Co., Transition Plan for Resolution M-4849 Plan**, and must be sent no later than twenty (20) days after this notice is sent.

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:

California Public Utilities Commission
Tariff Unit, Water Division, 3rd Floor
505 Van Ness Avenue
San Francisco, CA 94102
Fax: 415-703-2655
E-Mail: water_division@cpuc.ca.gov



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On the same date the response or protest is submitted to the Water Division, the respondent or protestant shall send a copy of mail (or e-mail) to the utility, addressed to:

Director of Community Relations
Post Office Drawer 5172
Chico, CA 95927
Fax: 530-894-5405
E-Mail: communityrelations@delorowater.com

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 Water Division within 5 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.

If you have not received a reply to your protest within ten (10) business days, contact Del Oro Water Company at 1-877-335-6764 or 530-717-2500.

Del Oro Water Company, Inc.

JANICE HANNA
Director, Corporate Accounting & Regulatory Affairs

Exhibit A
Del Oro Water Company
Transition Plan

CLASS B: RESOLUTION M-4849
DEL ORO WATER COMPANY TRANSITION PLAN OUTLINE

I. TRANSITION PLAN INTRODUCTION

Del Oro Water Company (DOWC or the water utility) has been asked to develop a Transition Plan for transitioning from the current Emergency Customer Protections Plan and Governor Newsom’s declared State of Emergency on March 4, 2020 as the result of the COVID-19 pandemic. The Governor imposed a moratorium on water service disconnections for non-payment and this plan provides a guide for customers to pay past due amounts that have been accumulated and avoid service disconnections for nonpayment of their water bill. Throughout the COVID-19 pandemic, DOWC has worked cooperatively with its customers to resolve unpaid bills by arranging for full or partial payments or to make arrangements for payments plans that are tailored directly to the customer’s needs. DOWC plans to continue this cooperative effort during this transition.

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

B. Transition Plan Guiding Principles

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

II. ACTIVITIES TIMELINE

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

- **February 11, 2021** – Resolution M-4849 adopted by the Commission
- **February 21, 2021** – DOWC filed Tier 1 Advice Letter demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021
- **February 25, 2021** – DOWC will submit draft Transition Plan Advice Letter to the Commission

- **March 11, 2021** – LIOB discusses DOWC draft Transition Plans during its quarterly meeting
- **April 1, 2021** –DOWC will submit final Transition Plan Advice Letter that incorporate feedback from LIOB and the Commission’s Water Division staff. DOWC begins implementing the ME&O Strategy activities outlined in Section III below

B. Resumption of Disconnections for Non-Payment

- Separately from the existing 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, it is uncertain when the end-date for the moratorium will be issued 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 each individual water utility, occurring at the soonest on the latter of July 1, 2021 or the EO Moratorium Lifting Date.
- **60 days prior to Disconnection Policy Resumption Date** – The water utility 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).
- **Disconnection Policy Resumption Date** – The water utility 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. The water utility 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 the water utility 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** – The water utility 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, the water utility 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, the water utility 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** – For residential occupants of individually metered multi-unit complexes who are not the customer of record, the water utility 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** – For detached single-family dwelling, the water utility will send written notice of termination pursuant to Health & Safety Code § 116916(f)(1) at least 7 calendar days prior to any possible disconnection.

If the Disconnection Policy Resumption Date is July 1, 2021, at the earliest, DOWC will use the following dates for applying standard late charges but will be flexible to use any date based on the ordered date ending the Disconnection Moratorium.

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

While Resolution M-4849 describes some ME&O activities that relate specifically to customers enrolled in income-qualified customer assistance programs (including such programs implemented by the Class A water utilities), none of the Class B water utilities are currently authorized to implement such customer assistance programs under their current tariffs. Therefore, those examples provided in Resolution M-4849 are not applicable to Class B water utilities and accordingly will not be included in their draft transition plan advice letters.

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 past-due balances on their accounts
 - Customers that may qualify for disconnection preventions due to medical needs pursuant to SB 998

B. ME&O Activities for All Customers

- DOWC will leverage ongoing communications 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 (when reopened to the public).

C. Targeted Outreach

- In addition, DOWC 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
 - Direct contact at customer residence (i.e. door tags)
 - 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

D. Partnerships

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

E. 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.”
- To the extent that DOWC is required to perform additional customer outreach, DOWC will submit a cost estimate and details of the new incremental activities. At this time, DOWC does not have an estimate for costs of this Transition Plan.

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

- On March 20, 2020, DOWC notified then-Commission Executive Director Alice Stebbins, in writing, that DOWC had activated its CEMA, and applicable provisions of the Emergency Customer Protections required by the Commission. On February 21, 2021, DOWC filed Advice Letter 526 in compliance with Resolution M-4849, extending the Emergency Customer Protections through June 30, 2021. With these filings, DOWC has complied with Commission Decision directives pertaining to pandemic emergency customer protections.
- DOWC has complied with the moratorium on water service disconnections for nonpayment ordered by Executive Order N-42-20 as well. There have been no water service disconnections for nonpayment by DOWC since before the declaration of the pandemic State of Emergency.
- Based on data through February 2021, single-family residential customers with past due balances on their accounts of 90 days or more facing water service disconnections. DOWC estimates that between 90 and 120 days the percentage of customers is 2% (123 out of 6,200 customers) and over 120 days the percentage of customers is 1.3% (79 out of 6,200 customers)

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

- DOWC has complied and adhered to all State and local health orders to ensure the safety of our employees and customers.

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.”

While Resolution M-4849 provides examples of progress tracking and reporting metrics aimed at measuring trends in the number of customers enrolled in income-qualified customer assistance programs (including such programs implemented by the Class A water utilities), none of the Class B water utilities are currently authorized to implement such customer assistance programs under their current tariffs. Therefore, those examples provided in Resolution M-4849 are not

applicable to Class B water utilities and accordingly will not be included in their draft transition plan advice letters.

A. Background and Protocols for Progress Tracking and Reporting

- DOWC 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, water utilities will report to the Water Division each metric on a monthly basis going back to February 2020 before the Emergency Customer Protections were implemented.

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

- DOWC 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.

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CERTIFICATE OF SERVICE

I certify that I have by mail this day served a true copy of Advice Letter No. XXX on all interested persons and organizations in these filings or their attorneys as shown on the attached list.

Dated _____ 2021 at Chico, California

Janice Hanna

NOTICE

Interested Persons and Organizations should notify the Water Division, Public Utilities Commission, 505 Van Ness Avenue, Room 4002 San Francisco, CA 94102, of any change of address to ensure that they continue to receive documents. You must indicate the Resolution number on the service list on which your name appears.

Del Oro Water Company
All Districts
Service List for Advice Letter No. XXX

California Public Utilities Commission
Public Advocates Office
PublicAdvocatesOffice@cpuc.ca.gov

California Public Utilities Commission
Division of Water and Audits
water.division@cpuc.ca.gov

County of Butte, Board of Supervisors
Attn: Robin Bennett
747 Elliott Road
Paradise, CA 95969
1-530-872-6304
dteeter@buttecounty.net

Buzztail Community Services District
Attn: Jim McCrossin, President
PO Box 7303
Chico, CA 95927
jim@mccrossin.us
bookwormto@aol.com

Fresno County Administrator
Jean Rousseau
2281 Tulare, Suite 304
Fresno, CA 93721
1-559-600-1710
naortiz@co.fresno.ca.us

Glenn County
516 West Sycamore St.
Willows, CA 95988
1-530-934-6400
gcboard@countyofglenn.net

Humboldt County Administrator
Loretta A. Nickolaus,
825 Fifth Street, Room 111
Eureka, CA 95501-1153
1-707-445-7266
cao@co.humboldt.ca.us

Kern County Administrator
Mr. John Nilon
1115 Truxton Avenue
Bakersfield, CA 93301
1-661-868-3198
caomailbox@kerncounty.com

Larry Lees, Shasta County Administrative Officer
1450 Court Street, Ste. 308A
Redding, CA 96001-1673
1-530-225-5561
lrees@co.shasta.ca.us

Tulare County Administrator
Jason Britt
2800 West Burrel Avenue
Visalia, CA 93291-4582
1-559-636-5005
jtbritt@co.tulare.ca.us

Tuolumne County Offices
Mr. Craig Pedro, County Administrator
2 South Green Street
Sonora, CA 95370
1-209-533-5511

Arbuckle Public Utility District
Jim Scheimer, Manager
P.O. Box 207
Arbuckle, CA 95912
530-476-2054
apud@frontiernet.net

Del Oro Water Company
All Districts
Service List for Advice Letter No. XXX

Burney Water District

William Rodriguez
20222 Hudson Street
Burney, CA 96013
1-530-335-3582
burneywd@yahoo.com

California Hot Springs Water Service

P. O. Box 146
California Hot Springs, CA 93207
No Email

Ferndale Enterprise

PO Box 1066,
Ferndale, CA 95536
editor@ferndaleenterprise.us

Lassen Pines Mutual Water Company

9367 Mountain Meadow Road
Shingletown, CA 96088
530-474-5120
lpmw@frontiernet.net

McFarland Mutual Water Company

Mr. Rocio Mosqueda
209 W. Kern Avenue
McFarland, CA 93250
1-661-792-3058
rmosqueda@mcfarlandcity.org

City of Orland

815 4th Street
Orland, CA 95963
(530) 865-1610
evonasek@cityoforland.com

Paradise Irrigation District

Mr. Tom Lando
P.O. Box 2409
Paradise, CA 95967
1-530-877-4971
tlando@paradiseirrigation.com

Riverside Community Services District

Nancy Trujillo
P.O. Box 857
Ferndale, CA 95536
1-707-786-9772
No-email

Springville Public Utility District (SPUD)

Attn: Marilyn
P.O. Box 434
Springville, CA 93265
1-559-539-2869
Spud@springvillewireless.com

Strawberry Homeowners Association

Mr. Dennis Kelley, Webmaster
1963 Curtner Avenue
San Jose, CA 95124-1303
408-626-9153
webmaster@strawberrypropertyowners.com

Tuolumne Utilities District

Mr. Tom Haglund
18885 Nugget Blvd.
Sonora, CA 95370
1-209-532-5536
thaglund@tudwater.com

Del Oro Water Company

Janice Hanna, Director of Corporate Accounting
jeh@corporatecenter.us

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servicelist@delorowater.com