CALIFORNIA PUBLIC UTILITIES COMMISSION
WATER DIVISION

Advice Letter Cover Sheet

Utility Name: Golden State Water Company

District: Company-Wide

CPUC Utility #: 133 W

Advice Letter #: 18xx-W

Tier ☐1 ☐2 ☐3 ☒ Compliance

Authorization Resolution No. M-4849

Description: Emergency Customer Protections-Transition Plan

Date Sent to Service List: 4/1/2021

Protest Deadline (20th Day): 4/20/2021

Review Deadline (30th Day): 4/30/2021

Requested Effective Date: TBD

Rate Impact: N/A

The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list. Please see the "Response or Protest" section in the advice letter for more information.

Utility Contact: Ronald Moore

Phone: (909) 394-3600 x 682

Email: rkmoore@gswater.com

Utility Contact: Nguyen Quan

Phone: (909) 394-3600 x 664

Email: nquan@gswater.com

Water Division Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

WD USE ONLY

DATE	STAFF	COMMENTS

[ ] APPROVED [ ] WITHDRAWN [ ] REJECTED

Signature: _____ **Comments:** _____

Date: _____

April 1, 2021

Advice Letter No. 18xx-W **(133 W)**

California Public Utilities Commission

Golden State Water Company (GSWC) hereby transmits this advice letter to inform the California Public Utilities Commission (Commission) of its Post-Emergency Customer Protections Transition Plans, pursuant to Commission Resolution No. M-4849, dated February 11, 2021.

BACKGROUND

The Commission issued Resolution No. M-4849 on its own motion in response to Governor Gavin Newsom's declaration of a state of emergency and issuance of executive orders due to the novel coronavirus (COVID-19) pandemic. On April 17, 2020, the Commission issued Resolution No. M-4842, which ordered energy, water, and communications corporations to implement Emergency Customer Protection measures, effective March 4, 2020.

In Resolution No. M-4849, the Commission extended the emergency customer protections for residential and small business customers through June 30, 2021. On February 22, 2021, GSWC filed Advice Letter No. 1844-W (Tier 1), in compliance with Resolution No. M-4849, to notify the Commission of its intent to continue the Emergency Customer Protection measures until June 30, 2021 or further out, if the Commission deems it necessary. Additionally, Resolution No. M-4849 ordered electric, gas, communications, and water corporations to submit a draft Tier 2 Advice Letter to CPUC staff, no later than February 25, 2021, outlining their transition plans associated with expiration of the Emergency Customer Protections. GSWC's transition plan is robust and structured to complement the goals of Resolution No. M-4849. GSWC will be easing customers off the Emergency Customer Protections by providing helpful and informative information on handling arrearages, making bill payment arrangements, and enrolling in California Alternate Rate for Water (CARW/LIRA) program for low-income customers.

Ordering Paragraph Nos. 5 and 6 in No. M-4849 states,

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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 though 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.*

6. *By February 25, 2021, electric, gas, and water corporations subject to this Resolution shall submit drafts of Transition Plan Advice Letters to CPUC staff (Gillian.Weaver@cpuc.ca.gov), who will share them with the LIOB.*

DISCUSSION

Pursuant to Resolution M-4849, transition plans shall include,

1) a 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.

GSWC's Transition Plan details how it intends to notify customers and our communities regarding the extension of Emergency Customer Protections through June 30, 2021 (and, the future expiration of the disconnect moratorium in the Governor's Executive Order N-42-20), and how it will work closely with customers with active arrears to mitigate the impact on customers experiencing financial hardships to avoid service disconnection for non-payment. GSWC intends to educate customers on the extended emergency customers protections measures, resources after the Emergency Customers Protection measures

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expires, water bill and usage management, alternative payment plan options, and its CARW program for low income customers.

A copy of GSWC's Transition Plan is attached to this advice letter. See Attachment A.

COMPLIANCE

GSWC hereby submits its Transition Plan to ease customers off the Emergency Customer Protections when the Emergency Customer Protection measures expire.

Please note: GSWC's Transition Plan does not have significant ME&O incremental costs, so a special budget is not being requested. However, GSWC reserves the right to request incremental ME&O costs to be included in its COVID Catastrophic Event Memorandum Account (CEMA)should the ME&O strategy be adjusted to include additional activities, therefore, GSWC will keep open its CEMA to track and recover any unforeseen incremental costs incurred to fully implement its Transition Plan.

GSWC is filing this Tier 2 advice letter in compliance with Resolution No. M-4849.

CUSTOMER COMMUNICATIONS

As part of the Transition Plan, all content intended for customers, including all aid GSWC is offering to its customers to assist them with easing off the Emergency Customer Protections will be made available in English, Spanish, Chinese (including Cantonese, Mandarin and other Chinese languages), Tagalog, Vietnamese, Korean and Russian. GSWC will provide communications in other languages if it can be verified that at least 10 percent of customers in a given area speak that particular language to its customers using one or more of the following ways: GSWC's website, bill messages, bill insert, email, press release, social media, and office signage (when the customer service offices re-open). Some methods of communication including social media may limit GSWC's ability to share information in multiple languages.

TIER DESIGNATION

As directed by Resolution No. M-4849, this advice letter is submitted with a Tier 2 designation.

CUSTOMER NOTICE

Pursuant to Water Industry Rule No. 3.2 in the Commission's General Order 96-B, this advice letter does not require a customer notice nor a customer notice verification.

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RESPONSE OR PROTEST

Anyone may submit a response or protest for this Advice Letter (AL). When submitting a response or protest, **please include the utility name and advice letter number in the subject line.**

A **response** supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter. A **protest** objects to the AL in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

1. The utility did not properly serve or give notice of the AL;
2. The relief requested in the AL would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
3. The analysis, calculations, or data in the AL contain material error or omissions;
4. The relief requested in the AL is pending before the Commission in a formal proceeding; or
5. The relief requested in the AL requires consideration in a formal hearing, or is otherwise inappropriate for the AL process; or
6. The relief requested in the AL is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require re-litigating a prior order of the Commission.

A protest may not rely on policy objections to an AL where the relief requested in the AL follows rules or directions established by statute or Commission order applicable to the utility. A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

Water Division (WD) must receive a response or protest via email (**or** postal mail) within 20 days of the date the AL is filed. When submitting a response or protest, **please include the utility name and advice letter number in the subject line.**

The addresses for submitting a response or protest are:

Email Address:	**Mailing Address:**
Water.Division@cpuc.ca.gov	CA Public Utilities Commission Water Division 505 Van Ness Avenue San Francisco, CA 94102

On the same day the response or protest is submitted to WD, the respondent or protestant shall send a copy of the protest to Golden State Water Company at:

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Email Address:
regulatoryaffairs@gswater.com

Mailing Address:
Golden State Water Company
Ronald Moore
630 East Foothill Blvd.
San Dimas, CA 91773

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform WD, 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. Any reply must be received by the Water Division within five business days after the end of the protest period, and shall be served on the same day on each person who filed the protest or response to the AL.

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

No individuals or utilities have requested notification of filing of tariffs. Electronic distribution of this advice letter is being made to the attached service list in accordance with General Order No. 96-B. The advice letter will also be electronically served on the service lists for R.18-03-011 and R.17-06-024. A copy of this advice letter will be posted on GSWC's website for review and printing.

Sincerely,

/s/ Ronald Moore
Ronald Moore
Regulatory Affairs Department
Golden State Water Company

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c: Terence Shia, CPUC - Water Division
Bruce DeBerry, CPUC – Water Division
James Boothe, CPUC – Water Division
Jeremy Ho, CPUC- Water Division
Victor Chan, CPUC- Cal PAO
Richard Rauschmeier, CPUC- Cal PAO
Lucian Filler, Deputy Executive Director

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Attachment A

Resolution M-4849

Golden State Water Company Transition Plan Outline

I. TRANSITION PLAN INTRODUCTION

Golden State Water Company (Golden State Water) recognizes that COVID-19 has impacted customers in different ways, and some have faced significant financial challenges as a result of the pandemic's impact on the economy.

In March 2020, Golden State Water proactively implemented an action plan to protect the health of our customers and employees, and provide accommodations for customers impacted by the Coronavirus (COVID-19) public health emergency. The action plan included the temporary closure of customer service offices and extended the temporary moratorium on residential service disconnections for non-payment outlined in California Senate Bill 998 (SB 998), while encouraging customers experiencing financial hardship to contact our Customer Service Center to discuss payment extension and payment plan options that may be available to keep their accounts in good standing.

Golden State Water filed an Advice Letter to activate its Emergency Disaster Relief Program (EDRP) on March 19, 2020, providing additional protections for residential and small business customers impacted by the public health emergency. The timing of this filing was aligned with California Governor Gavin Newsom's declaration of a State of Emergency. The EDRP meets compliance with California Public Utilities Commission (CPUC) Resolution No. M-4833, which establishes the below protections during an emergency event for customers served by CPUC-regulated water providers in the state of California.

- To work cooperatively with affected customers to resolve unpaid bills and minimize disconnections for non-payment;
- To waive reconnection or facilities fees for affected customers and suspend deposits for affected customers who must reconnect to the system;
- Provide reasonable payment options to affected customers.

Golden State Water has executed an aggressive outreach campaign to alert customers and stakeholders regarding the protections outlined in the EDRP plan and has provided targeted outreach to customers with arrears to help them identify options that may work for them to address and manage their arrears.

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To meet compliance with CPUC Resolutions M-4842 and M-4849 SB 998, Golden State Water has developed this transition plan to outline how we intend to notify customers and our communities regarding the extension of Emergency Customer Protections through June 30, 2021, and work closely with customers with active arrears to mitigate any impact on customers experiencing financial hardships directly related to COVID-19.

Golden State Water is taking a two-pronged strategic approach. We plan to provide education to all customers regarding the extended emergency customer protections and eventual expiration of the program; and targeted proactive outreach directly to customers with account arrears to ensure they are aware the protections will expire, and have clear information regarding the programs and resources available with the ultimate goal of enrolling them in programs to help address their debt and prevent disconnection for non-payment.

Our goal is to give customers in arrears viable options and adequate opportunity to get back in good standing to avoid non-payment disconnections after the emergency customer protections expire and the Governor lifts the moratorium on disconnections. We also want to help relieve any anxiety customers may have about the emergency customer protections expiring and ensure a successful transition.

All content intended for customers will be translated so it can be accessed in English, Spanish, Chinese (including Cantonese, Mandarin and other Chinese languages), Tagalog, Vietnamese, Korean and Russian, when possible, and any other language we can identify that at least 10 percent of customers in a given area may speak. Please note, some methods of communication including social media may limit the company's ability to share information in multiple languages.

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Additionally, Golden State Water will increase the frequency of its low income customer data exchanges with electric utilities to at least three times in 2021.

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

Below is a timeline of activities Golden State Water is proposing for activities associated with programs or initiatives that assist customers in bill management.

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

- **February 11, 2021** – Resolution M-4849 adopted by the Commission.
- **February 21, 2021** – Water utility files Tier 1 Advice Letter demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021.
- **February 25, 2021** – The water utility submits draft Transition Plan Advice Letter to the Commission.
- **March 11, 2021** – LIOB discusses water utility draft Transition Plans during its quarterly meeting.

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- **April 1, 2021** – The water utility 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

- Golden State Water has set a timeline for resumption of disconnections for non-payment around a "Disconnection Policy Resumption Date" anticipated to be no sooner than the latter of July 1, 2021 or when the Executive Order N-42-20 moratorium is lifted (EO Moratorium Lifting Date).
- **At Least 60 days prior to Disconnection Policy Resumption Date** – Golden State Water will begin sending out notices to customers informing them of the resumption of 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** – Golden State 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. Golden State Water will individually reach out to each customer that has a delinquent bill as of the Disconnection Policy Resumption Date to offer an opportunity to participate in an alternative payment schedule, or a plan for deferred or reduced installments 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** – Golden State 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 residential disconnection for non-payment, advance noticing required by SB 998 will be provided as follows below. In addition, each notice provided will include the alternative payment arrangements made available as part of the transition plan.

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- **At Least 7 Business Days Before Disconnection** – No less than 7 business days prior to possible discontinuation of residential service for nonpayment, the customer named on the account (and "Occupant at property address if different from address of customer named on the account) will be contacted 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, written notice pursuant to Health & Safety Code § 116916(b) will be provided at least 10 calendar days prior to possible disconnection.
- **At Least 7 Calendar Days Before Disconnection (If Applicable)** – For residential occupants of detached single-family dwelling, written notice of termination pursuant to Health & Safety Code § 116916(f)(1) will be provided at least 7 calendar days prior to possible disconnection.

C. Resumption of Verification/Recertification of Eligibility for CARW

- **June 1, 2021** – Golden State Water will begin sending out written notices to all CARW customers informing them that of the resumption of the standard CARW eligibility verification and recertification requirements under its tariffs on July 1, 2021.
- **July 1, 2021** – Golden State Water may resume standard eligibility verification and recertification procedures for CARW customers.

D. Late Payment, Reconnection, or Other Customer Fees

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

III. MARKETING, EDUCATION, AND OUTREACH STRATEGY

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Golden State Water has developed the following Marketing, Education and Outreach Strategy (ME&O) to effectively and efficiently educate customers about Emergency Customer Protections expiring after June 30, 2021 (and, the future expiration of the disconnect moratorium in the Governor's Executive Order N-42-20); and engage and enroll customers with active arrears into new bill management programs.

A. Outreach To All Customers Regarding Extended Emergency Customer Protections

Golden State Water will notify customers of the extended Emergency Disaster Relief Customer Protections and planned expiration (June 30, 2021), ensuring access to the information in all languages required by the CPUC. This communication will also provide information regarding programs and services to help transition customers with arrears to help mitigate any risk of service disconnections. We will provide this education in the following ways:

- **Website** – will add updated information in all required languages to GSWater.com homepage and Disaster Relief Customer Protections page on website. Links to the information will also be provided on all 20 local pages of the website to ensure the information is accessible and easy to navigate from multiple touchpoints.
- **MyGSWater Customer Portal** – will add a link to the MYGSWater customer portal directing customers to the updated information in all required languages on the GSWater.com website.
- **Social Media** – will post updated information regularly on the utility's Twitter and Facebook pages.
- **Customer Email/e-Newsletter** – will disseminate at least two customer emails to all customers in email database. The first email will alert customers of the extended protections, and a second email reminding them of the expiration of protections will be sent.
- **Incoming Phone Calls** – will add information regarding the extended emergency customer protections and planned expiration to the phone tree for incoming calls to the Customer Service Center.
- **Bill Insert/Mail** – will issue at least one bill insert to all customers to educate regarding the extension of emergency customer protections and planned expiration date. For

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customers who receive electronic bills, this may be provided in the form of a link to the digital bill insert.

- **News Release/Media Advisory** – will issue a news release to all media organizations that cover its service areas to help educate customers regarding the extended protections and planned expiration.
- **Customer Ambassadors/Employees** – will develop and issue detailed information regarding the extension and planned expiration of Emergency Disaster Relief Customer Protections to employees, so they are equipped to answer any questions from customers.
- **Stakeholder Communications** – will distribute an educational email to local city/community leaders in our database to provide a substantive overview of the extended protections, planned expiration and programs/resources available to help customers with account arrears.

B. Targeted Outreach To Help Transition Customers With Arrears

Golden State Water will execute a targeted outreach campaign to support the Transition Plan, specifically for customers who have missed payments and/or have account arrears that could lead to eventual disconnections after the emergency customer protections expire. 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 that may qualify for disconnection preventions due to medical needs pursuant to SB 998
- Customers on assistance programs

The Strategy was developed with a customer-impact lens and is part of a coordinated and effective marketing, education and outreach program. Customers in this group will be made aware of their account status and the following programs/resources available to help them address their arrears:

- Alternative payment arrangements, including but not limited to:

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    - Interest-free payment plans
    - Interest-free payment extensions
- Low-income ratepayer assistance (CARW/LIRA)
- Conservation rebates and programs

We will communicate with these customers in the following ways:

- **Direct Mail/Email** – will continue sending direct communication to customers with arrears, attempting to have them resolve their debt or enroll for support through the aforementioned programs/resources. We will send emails to those in our email database, and will attempt to send direct mail to all other customers in this group. We will attempt to send at least one mail/email communication to each customer in this group and will monitor the results to determine additional need.
- **Outbound Calls** – will place outbound direct calls to those customers with the largest arrears in an attempt to get them enrolled in assistance programs/resources. This tactic will depend upon the availability of human resources through our Customer Service Center.
- **Website** – will add updated information in all required languages to GSWater.com 'payment options' page outlining the process for customers to enroll in available assistance programs/resources.
- **MyGSWater Customer Portal** – will add updated information in all required languages to MyGSWater customer portal outlining the options and process for customers to enroll in available assistance programs/resources.
- **Social Media** – will post regular content sharing the programs/resources available to customers with arrears to mitigate the risk of disconnection.
- **Customer Ambassadors/Employees** – will develop and issue detailed information regarding the process to get this group of customers enrolled in assistance programs/resources to employees, so they are equipped to answer any questions from customers.

C. Partnerships

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- **Golden State Water** – 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.
- **Industrywide Partnership Activities** – California Water Association (CWA) may also help to coordinate the following additional potential avenues and partnerships:
    i. The California Special Districts Association (CSDA) and their local service providers to promote programs offered by local regulated water utilities.
    ii. 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.
    iii. Seeking partnerships with diverse suppliers to assist regulated water utilities in implementing customer ME&O activities and tools.

D. Incremental ME&O Costs

- The proposed ME&O strategy was designed to utilize existing communication resources to limit any need to recover additional costs through rates. As the incremental costs associated with the proposed plan is not significant, Golden State Water does not request an additional budget at this time to fund the proposed ME&O strategy. Golden State Water reserves the right to request incremental ME&O costs to be included in its COVID Catastrophic Event Memorandum Account should the ME&O strategy be adjusted to include additional activities.

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."

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A. Alignment with Program Enrollment Targets and Requirements

- Effective March 4, 2020, Golden State Water implemented its Emergency Customer Protections measures, which comprised of working cooperatively with affected customers to resolve unpaid bills (arrearages), waive reconnection or facilities fees for customers, suspend customer deposits, and provide reasonable payment options to its customers. Golden State Water has tracked the number of customers requesting bill assistance and the number of customers making partial payments against a payment arrangement. The latter data is submitted to the Commission on a monthly basis, as required in the Commission's R.17-06-024 proceeding. Golden State Water stopped collecting reconnection fees and deposits from its customer and refunded any reconnection fees and deposits that were collected from customers between March 4, 2020 and the issuance of Resolution M-4842 (dated April 16, 2020), which established the March 4, 2020 effective date.
- Pursuant to Executive Order N-42-20, Golden State Water implemented a moratorium on all water service disconnections on residential and small businesses for non-payment. Additionally, Golden State Water restored the water service to any residential and small business customers that had been disconnected prior to the issuance of Executive Order N-42-20. Golden State Water will continue to not disconnect residential and small business customers for non-payment until Executive Order N-42-20 is lifted.
- In compliance with Resolution M-4849, Golden State Water will extend all the Emergency Customer Protections approved in Resolution M-4842 through June 30, 2021. Golden State Water acknowledges that the Commission reserves an option to extend the Emergency Customer Protections measures beyond June 30, 2021.
- As part of its day-to-day operations and customer care protocol, Golden State Water will always offer to work cooperatively with customers to resolve unpaid bills, minimize disconnections for non-payment, provide reasonable payment options to customers, and promote its low income customer assistance program to its customers. These measures will remain in place beyond June 30, 2021 and the lifting of Executive Order N-42-20.
- As detailed in Section III, Golden State Water will employ several methods to educate customers of available assistance. Additionally, alternative payment options meeting SB

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998 parameters are currently being offered to customers and will continue to be offered going forward, providing significantly more time for customers to enter alternative payment plans than required by SB 998. To avoid any possible confusion surrounding time protections prescribed in SB 998, Golden State Water will provide the full 60 days of protection regarding delinquent accounts beginning on the yet-to-be-determined Disconnection Policy Resumption Date. This approach to handling delinquent customer accounts is above and beyond Golden State Water's current policies as described in ALs 1808-W and 1815-W implementing SB 998 requirements. Golden State Water will also comply with SB 998's noticing requirements (as referenced in Section II) prior to any possible residential disconnection in the event a customer chooses not to enter or comply with an alternative payment plan.

- As mandated in Resolution M-4849, Golden State Water is projecting that approximately 15,000 customer accounts or ~6% of total accounts may be facing disconnection after June 30, 2021. The calculation used to make this projection was solely based on the average monthly growth rate seen from July 2020 to January 2021 of accounts in arrears for >90 days. It does not take into consideration the high percentage of accounts that have paid historically after receiving a disconnection notice for non-payment, specifically 86% in 2018 and 87% in 2019. The projected number also does not reflect any customer participation in alternative payment plans that will be available during the transition period.

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

- Golden State Water continually follows all State (California Department of Public Health) and ten County health orders in which Golden State Water provides water service. In addition, Golden State Water maintains compliance with California Occupational Health and Safety (Cal-OSHA) Emergency Regulation 3205 on COVID-19 Prevention, which went into effect November 30, 2020. From the beginning of the Pandemic, Golden State Water has implemented safety precautions that protect employees and customers by closing all Customer Service offices and limiting employee and customer interactions as much as possible. If there are any in-person customer interactions, they are of limited duration, employees are directed to maintain a minimum 6 feet distance and always

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where a face covering, as mandated by State order, and implement personal hygiene. We will continue to follow all state and local health orders to ensure the health and safety of our employees and customers during this transition.

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

- The Class A water utilities have been and will continue providing monthly data reports regarding customer arrearages as part of the water low-income rate assistance rulemaking proceeding R.17-06-024. This section should summarize the categories of data that the water utility will continue to track and report as part of that process. Class A water utilities will continue to file such reports in that proceeding and submit copies to Water Division until directed otherwise in that proceeding.
- Additionally, both Class A and B water utilities will track and report the following metrics outlined below as part of the monthly data reports submitted in rulemaking proceeding R.17-06-024. Water utilities 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 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 CARW programs should be defined as customers being billed pursuant to the respective utility CARW tariffs.

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B. Metrics to Track Continued Enrollment in CARW

- Golden State 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 CARW program post June 30, 2021.
    - Number and percent of customers required to take actions to remain on the water utility CARW programs (e.g., recertification, post enrollment verification) that successfully complete those actions.

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

- Golden State Water 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
    - Number and percentage of customers that are disconnected.
    - Change in arrearage amounts (to the extent such information is not already tracked as part of the Rulemaking R.17-06-024 reporting requirements).

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GOLDEN STATE WATER COMPANY
REGION 1, 2 & 3 – SERVICE LIST

Sacramento Suburban Water Dist.
3701 Marconi Avenue – Suite 100
Sacramento, CA 95821
HHernandez@sswd.org
DYork@sswd.org

Citrus Heights Water District
6230 Sylvan Road
Citrus Heights, CA 95610

Carmichael Water District
7837 Fair Oaks Blvd.
Carmichael, CA 95608-2405

California-American Water Co.
4701 Beloit Drive
Sacramento, CA 95838-2434
ca.rates@amwater.com

Cypress Ridge Owner's Association
Attn: President
1400 Madonna Road
San Luis Obisbo, CA 93405
Cory.Bauer@managementtrust.com

Fair Oaks Water District
10317 Fairoaks Blvd.
Fairoaks, CA 95628

City of Folsom
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Orange Vale Water Co
P. O. Box 620800
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Highlands Water Company
14580 Lakeshore Drive
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City of Alhambra Utilities Dept.
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REGION 1, 2 & 3 – SERVICE LIST

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CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

PROCEEDING: R1803011 - CPUC - OIR REGARDING
LAST CHANGED: FEBRUARY 8, 2021

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