CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS

Advice Letter Cover Sheet

Utility Name:	Alisal Water Corporation dba Alco Water Service (WTR)	**Date Mailed to Service List:**	04/01/21
District:	n/a		
CPUC Utility #:	WTB 206	**Protest Deadline (20th Day):**	04/21/21
Advice Letter #:	203	**Review Deadline (30th Day):**	05/01/21
Tier	☐1 ☒2 ☐3 ☒ Compliance	**Requested Effective Date:**	05/01/21
Authorization	M-4849		
		Rate Impact:	$-0- 0.00%
Description:	Per M-4849, Compliance Filing of the Transition Plan for the Expiration of Emergency Customer Protections on June 30, 2021.		

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:	Thomas R. Adcock	**Utility Contact 2:**	Andrew Clarke
Phone:	(831) 424-0441	**Phone 2:**	(831) 424-0441
Email:	tom@alcowater.com	**Email 2:**	andy@alcowater.com

DWA Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

DATE	STAFF	COMMENTS

[ ] APPROVED [ ] WITHDRAWN [ ] REJECTED

Signature: _____ Comments: _____

Date: _____

ALISAL WATER CORPORATION

A California Corporation
dba ALCO WATER SERVICE

Thomas R. Adcock
President
(831) 424 - 0441 Phone

249 Williams Road
Salinas, CA 93905
(831) 424 - 0611 Fax

FILED
APR 01 2021
PUBLIC UTILITIES COMMISSION
WATER DIVISION

April 1, 2021

ADVICE LETTER NO. 203 Alisal Water Corporation dba Alco Water Service (U 206 W)

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Summary

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

Background

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

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

Transition Plan for the Expiration of Emergency Customer Protections

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

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

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

Resolution M-4849 Ordering Paragraph 5 states:

5. Electric, gas, and water corporations subject to this Resolution shall each file Tier 2 Advice Letter with their transition plans for the expiration of Emergency Customer Protections by April 1, 2021. The transition plans shall include 1) a timeline of new start and resumed activities, 2) a marketing, education and outreach (ME&O) strategy, 3) an explanation of the activities timeline and ME&O strategy accounts for compliance and safety, and 4) a progress tracking and reporting plan. The goal of the transition plan is to proactively enroll customers in programs to manage their utility bills and inform relevant customers of the changes to programs they are already on, to effectively ease customers 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.

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

On March 24, 2021 the LIOB provided all IOU's subject to Res. M-4849 with eight recommendations on the draft Transition Plans. Of the eight recommendations provide by the LIOB, three were applicable to water utilities and two are applicable to Alco as a Class B water utility. Those recommendations have been incorporated into its Transition Plan where feasible. The LIOB requested that the IOU transition plans have separate and distinct marketing, education and outreach plans targeting hard-to-reach customers in low-income, disadvantaged,

and/or underserved communities. Additionally, the LIOB requested additional reporting metrics and a definition of success. Alco has included these additional items in its Transition Plan.

The CPUC Water Division provided comments on the Transition Plans on March 30, 2021. Their recommendations were for utilities to provide their plans for communicating to customers about funding opportunities for utility bill assistance and to also include the number and amounts of Housing and Community Development (HCD) payments applied to customers' bills in the Utility's transition reports. Alco has included these items in its Transition Plan.

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

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

Tier Designation and Requested Effective Date

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

Alco respectfully requests an effective date of May 1, 2021 for Advice Letter No. 203, in compliance with Ordering Paragraph 5 of Resolution M-4849.

Notice

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

Protests and Responses:

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

(1) The utility did not properly serve or give notice of the advice letter;

(2) The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;

(3) The analysis, calculations, or data in the advice letter contain material error or omissions;

(4) The relief requested in the advice letter is pending before the Commission in a formal proceeding; or

(5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or

(6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory (provided that such a protest may not be made where it would require relitigating a prior order of the Commission.)

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

A response or protest must be made in writing or by electronic mail and must be received by the Water Division within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3rd floor
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
water_division@cpuc.ca.gov

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

Recipients:	**Email:**	**Mailing Address:**	**Fax:**
Thomas R. Adcock *President*	tom@alcowater.com	Alco Water Service 249 Williams Road Salinas, CA 93905	(831) 424-0611
Andrew Clarke *Assistant Controller*	andy@alcowater.com	Alco Water Service 249 Williams Road Salinas, CA 93905	(831) 424-0611

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division, within the 20 day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

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

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

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

Attachment

ATTACHMENT

ALISAL WATER CORPORATION

A California Corporation
dba ALCO WATER SERVICE

Thomas R. Adcock
President
(831) 424 - 0441 Phone

249 Williams Road
Salinas, CA 93905
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San Francisco, CA 94102
water_division@cpuc.ca.gov

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

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