

**CALIFORNIA PUBLIC UTILITIES COMMISSION  
DIVISION OF WATER AND AUDITS**

**Advice Letter Cover Sheet**

California Water Service  
**Utility Name:** Company  
**District:** Class A Regulated Areas,  
including Grand Oaks  
**CPUC Utility #:** U-60-W  
**Advice Letter #:** 2407  
**Tier:** ☐ 1 ☒ 2 ☐ 3 ☐ Compliance  
**Authorization:** Resolution M-4849, OP 5  
**Description:** COVID Transition Plan

**Date Mailed to Service List:** 04/01/2021  
**Protest Deadline (20<sup>th</sup> Day):** 04/21/2021  
**Review Deadline (30<sup>th</sup> Day):** 05/01/2021  
**Requested Effective Date:** 07/01/2021  
**Rate Impact:** None

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.

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**DWA USE ONLY**

**DATE**

**STAFF**

**COMMENTS**

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[ ] APPROVED

[ ] WITHDRAWN

[ ] REJECTED

Signature: \_\_\_\_\_

Comments: \_\_\_\_\_

Date: \_\_\_\_\_

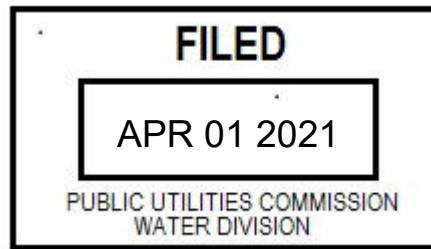
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**CALIFORNIA WATER SERVICE COMPANY**  
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April 1, 2021

**Advice Letter No. 2407**



To the California Public Utilities Commission:

California Water Service Company ("Cal Water") respectfully submits this Tier 2 advice letter applicable to all Class A regulated areas and Grand Oaks in accordance with Resolution M-4849, Ordering Paragraph 5, and requests approval of the tariff sheets listed in Attachment 1 and attached hereto.

Consistent with the Commission's guidelines during the COVID-19 pandemic, this advice letter is only being distributed electronically to the Water Division and the attached service lists.

**Summary**

The purpose of this filing is to present Cal Water's transition plan in accordance with Commission Resolution M-4849, an Authorization and Order directing investor-owned utilities (IOUs) to extend emergency customer protections to support California customers through June 30, 2021, and to file transition plans for the expiration of the emergency customer protections.

In addition to meeting the requirements of Resolution M-4849, this advice letter proposes a temporary Arrearage Management Plan (AMP) Program modeled on that approved for large energy companies in D.20-06-003 and Resolution E-5114. Cal Water's proposed AMP Program is temporary, with a one-year enrollment period, and would provide certain debt forgiveness for qualified low-income customers over a period of 12 months.

While several circumstances that could affect the appropriate timing for implementation of this advice letter may change, Cal Water submits this Tier 2 advice letter with a requested effective date of July 1, 2021.

**Background**

In Decision (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.<sup>1</sup> Pursuant to (Ordering Paragraph (OP) 1, emergency disaster customer relief protections shall apply to utility customers in areas affected by a disaster declared a state of emergency by the Governor of California or the President of the United States. Consistent with D.19-07-015 OP 9, when a disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation

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<sup>1</sup> D.19-07-015 at 4.



of the quality of utility services, the utilities must submit a Tier 1 Advice Letter (AL) with the Commission's Water Division within 15 days of a governor's state of emergency declaration or a presidential state of emergency proclamation reporting compliance with the Decision's mandated emergency disaster customer relief protections. On March 4, 2020, Governor Gavin Newsom (Governor) declared a State of Emergency in response to the outbreak of novel coronavirus, COVID-19.<sup>2</sup> On March 13, 2020, President Trump signed an Emergency Declaration to facilitate a federal response to the emerging COVID-19 pandemic.<sup>3</sup>

In response to the March 17, 2020 letter from then Executive Director Stebbins to energy, water and communication corporations to retroactively apply customer protection measures from March 4, 2020 onward during the pendency of the COVID-19 pandemic, for up to one year with an option to extend, Cal Water submitted AL 2379 on March 30, 2020 affirming the company's compliance with specific emergency customer protections and outreach activities in light of the COVID-19 pandemic.

These actions also complied with Executive Order N-42-20 (April 2, 2020) of Governor Newsom, in that Cal Water suspended shut-offs for nonpayment for all customers, and has worked to reconnect customers who had been disconnected for nonpayment since February 27, 2020).

On April 17, 2020, the Commission issued Resolution M-4842, which ratified directions provided by the Commission's Executive Director on March 17, 2020. In response, Cal Water filed AL 2383 to provide a more detailed response to address the seven items listed for water companies in Resolution M-4842, as well as Cal Water's outreach regarding those emergency customer protections.

On February 11, 2021, the Commission adopted Resolution M-4849, Authorization and Order Directing Utilities to Extend Emergency Customer Protections to Support California Customers through June 30, 2021, and to File Transition Plans for the Expiration of the Emergency Customer Protections.<sup>4</sup>

On February 22, 2021, Cal Water filed AL 2403 to demonstrate compliance with emergency customer protections through June 30, 2021.

Resolution M-4849 requires the Investor-Owned Utilities (IOUs) to file a transition plan "to facilitate a smooth transition for customers when the Emergency Customer Protections are lifted."<sup>5</sup> The IOUs are directed to "design the transition plan to effectively ease customers through a transition off of the Emergency Customer Protections."<sup>6</sup> The transition plan must

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<sup>2</sup> <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

<sup>3</sup> <https://www.federalregister.gov/documents/2020/03/18/2020-05794/declaring-a-national-emergency-concerning-the-novel-coronavirus-disease-covid-19-outbreak>.

<sup>4</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M365/K448/365448995.PDF>

<sup>5</sup> Res. M-4849 at 10.

<sup>6</sup> *Id.*



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.”<sup>7</sup> 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.”<sup>8</sup> In addition, “IOUs should take into account the challenges and solutions discussed in the October 30 and November 12, 2020 COVID workshops as they prepare their transition plans.”<sup>9</sup>

Resolution M-4849 also calls for consideration of input from the Low Income Oversight Board (LIOB) and Commission staff: “The IOUs shall consider and incorporate LIOB board member input where feasible, and any Commission staff feedback, and submit final advice letters on April 1, 2021.”<sup>10</sup> On March 19, 2021, the LIOB provided recommendations in a letter directed to the Commission. LIOB input has been included in this version of Cal Water’s Resolution M-4849 Transition Plan. The ME&O Strategy was prepared in coordination with other Class A investor-owned water utilities and includes consideration of the input from the LIOB.

## **Discussion**

A unique challenge to water utility IOUs is that because we are subject to an on-going moratorium on water disconnections for non-payment imposed by the Governor’s EO, we are unable to resume shutoffs for non-payment until either the EO is lifted, or when Commission mandates to minimize disconnections for non-payment expire, whichever date is later. Because of this uncertainty, it is difficult to provide a precise timeline, but as discussed later in this plan, Cal Water will be not resume shut-off for non-payment until 30 days after the latest directive expires.

Cal Water recognizes the substantial financial hardships that many of its customers have been enduring due to COVID-19 we remain committed to assisting our customers throughout the evolving pandemic and the transition from customer protections. Cal Water strives to transition from the expiration of Emergency Customer protections and the resumption of normal business activities, including disconnections for non-payment, in the most customer focused and efficient way possible.

## **TRANSITION PLAN**

### **A. Payment Plans**

Cal Water offers its customers payment arrangements to maintain their utility service and avoid

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<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 34.

<sup>9</sup> *Id.* at 10.

<sup>10</sup> Commission Resolution M-4849 at p. 16.





disconnection. During the disconnection moratorium, which remains in effect, Cal Water service representatives have worked closely with customers to structure payment plans to collect arrearages. Options available to customers include splitting payments (payment arrangements) for up to six months to pay off the full balance and deferring payments (payment extensions) of the full balance for up to two weeks beyond the due date. Cal Water intends to continue to offer payment arrangements and payment extensions once the disconnection moratorium is lifted and customer protections expire including offering customers a new, longer 12-month payment plan, and an arrearage management plan.

Customers who remain current on the payment arrangement and current bill will not be disconnected. Cal Water will not require additional statement of hardship or need for the purpose of qualifying customers for payment arrangements. These provisions will apply to both residential and non-residential customers.

### **B. Temporary Arrearage Management Payment (AMP) Program**

With a large geographic reach and diversified socio-economic customer base, Cal Water has determined that it is able to provide a temporary Arrearage Management Program (AMP) for low-income residential water customers impacted by the COVID-19 pandemic. Cal Water's implementation of an AMP Program is contingent upon its ability to recover the cost of debt forgiven via through the AMP Program, and the opportunity to recover significant incremental implementation costs. The Commission has previously approved a similar arrearage management program and cost recovery for energy utilities in D.20-06-003 and Resolution E-5114.

Cal Water proposes to track the debt forgiven through the AMP Program in the balancing account associated with its CAP/LIRA program. At this time, it is unclear whether the technical changes and outreach needed to implement and maintain the AMP can be handled internally, or whether assistance from consultants (such as IT consultants) will be required. To the extent that Cal Water must incur significant costs incremental to existing rates, Cal Water requests authority to track administrative costs related to the AMP in its memorandum account associated with its CAP/LIRA program.<sup>11</sup>

Cal Water will facilitate enrollment in the AMP Program by providing all eligible customers with information concerning the AMP Program, will maintain a frequently asked questions (FAQ) section on its website detailing how CAP/LIRA customers can participate, and will offer eligible customers the opportunity to enroll in the AMP Program when customers call Cal Water for any reason.

The key elements of the proposed AMP Program are described below:

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<sup>11</sup> While Cal Water's CAP/LIRA Balancing Account tracks ongoing funding and subsidies related to the program, the CAP/LIRA Memorandum Account was specifically left open to track "the incremental costs of any new Commission requirements that impact the LIRA program." D.16-12-042, Exhibit A (Settlement Agreement) at 52.



- The Arrearage Management Payment (AMP) Program will be open for enrollment for one year. When enrollment will begin depends upon many factors, including when State protections (e.g., moratorium on residential disconnection due to nonpayment) are lifted, the timing of Commission approval of the AMP Program, and when Cal Water completes testing and implementation of the technical modifications needed to roll out the AMP Program company-wide.<sup>12</sup>
- The temporary program is intended to help customers recover from financial hardship worsened by the COVID-19 pandemic.
- After enrollment in the program, one-twelfth (1/12) of a participant's eligible overdue<sup>13</sup> debt will be forgiven after each on-time payment of one month's worth of current water charges. For bi-monthly bills, an on-time payment of the bill will provide forgiveness for two-twelfths (2/12) of the eligible debt.
- If a statewide or federal program that provides debt assistance to customers is implemented prior to expiration of the AMP Program, the statewide or federal program will replace the AMP program.

#### 1. AMP Program Eligibility and Enrollment Criteria

##### a) A customer is eligible for participation in the AMP Program if:

- i) A customer has an individually-metered residential account and is enrolled in the Customer Assistance Program (CAP). (CAP was formerly known as the Low-Income Ratepayer Assistance, or LIRA, program);
- ii) The overdue amount on the customer's water account is more than [*minimum overdue \$ amount*],<sup>14</sup> a portion of which is older than 90 days;
- iii) The customer has had a Cal Water account for at least 6 months, and has made at least one (1) full on-time payment (full payment of all water charges within 30 days of bill date) within the last 24 months; and,
- iv) In the prior 12-month period, the customer's water use has not exceeded twice the amount of the annual residential consumption per customer the Commission has adopted for the customer's service area.

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<sup>12</sup> For example, if the Commission has authorized the AMP Program and Cal Water has resolved technical implementation issues before the disconnection moratorium is lifted, Cal Water would open the AMP enrollment period before resuming the residential disconnection process authorized in Cal Water's tariff rules.

<sup>13</sup> For the purposes of the AMP Program, "overdue" is considered to be amounts not paid within 30 days of bill issuance.

<sup>14</sup> Cal Water is in the process of determining both the minimum arrearage amount for eligibility in the AMP Program, as well as the maximum arrearage amount that may be forgiven for a customer. Complicating factors include: different rates per ratemaking area (unlike the energy companies), different usage per ratemaking area due in part to different rates, and when the residential SONP moratorium is lifted, which will play a large role in determining the arrearage amounts that can be addressed without an undue burden on non-CAP customers who will fund the AMP Program.



- b) An eligible customer can become a participant in the AMP Program in any month during the enrollment period. A participant may not re-enroll if removed from the program.
- c) Participants will not have service discontinued for nonpayment while enrolled in the AMP Program.
- d) A participant who stops receiving benefits from CAP (formerly the Low-Income Ratepayer Assistance, or LIRA, program) may remain in the AMP Program.

## 2. Debt Forgiveness

- a) After enrollment, one-twelfth (1/12) of the participant's debt eligible for forgiveness will be forgiven after each on-time payment is made for one month's worth of current charges. (For bi-monthly bills, an on-time payment of the bill will provide forgiveness for two-twelfths (2/12) of the eligible debt.)
- b) The amount of the participant's debt that is eligible for forgiveness is determined at the time of enrollment, but may not exceed [*maximum forgiveness \$ amount*]<sup>15</sup> in total. Only charges for water service can be considered debt eligible for forgiveness.
- c) After on-time payments for twelve months of current charges, all eligible debt will be forgiven. Any remaining overdue amounts are owed to the utility.
- d) Any payment received while the participant is in the AMP program will be applied toward current charges, and will not be applied to any overdue debt. If a payment is received in excess of current charges, the excess will be applied to future charges.
- e) Current charges that are not paid on time:
  - i) A participant may miss one on-time payment of a bill and remain in the program, as long as the next payment is on time, and is made for an amount that includes both the current charges and the previous bill's overdue charges.
  - ii) A participant may miss an on-time payment of a bill twice during the 12-month program. Missing a payment a third time will result in removal from the program.
  - iii) A participant who misses two on-time payments in a row will be removed from the program.
- f) If a participant is removed or drops out from the program, the debt that has been forgiven is still considered forgiven. All remaining eligible debt, and any debt that was ineligible for forgiveness, is owed to the utility.
- g) All debt forgiven will be tracked in the balancing account for the Customer

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<sup>15</sup> See previous footnote.



Assistance Program (formerly the Low-Income Ratepayer Assistance, or LIRA, program).

### **C. Late payment charges**

Cal Water does not charge late payment fees.

### **D. Restoration of Service**

In order to resume or continue service that has been disconnected for non-payment, Cal Water intends to resume assessing reconnection fees after the expiration of Emergency Customer Protections. As the disconnection moratorium has been in place since March 2020 and Cal Water has not disconnected customers for non-payment, reconnection fees will resume after the minimum 79-day grace period<sup>16</sup>, as contained in the tariff rules, expires. As such, Cal Water expects to resume assessing reconnection fees at that time.

Customers will be notified of this change 30-days prior to the expiration of the Emergency Customer Protections.

### **E. Low-Income Ratepayer Assistance / Customer Assistance Program Recertification**

Low-Income Ratepayer Assistance (LIRA) or Customer Assistance Program (CAP)<sup>17</sup> customers recertify their eligibility every two years. While the Emergency Customer Protections have been in effect, eligibility recertification has been suspended. When the Emergency Customer Protections expire, Cal Water will ensure that customers have at least 60 days to recertify prior to being removed from the program.

Cal Water notes that data exchanges between itself and the energy companies now occurred three times in 2020 to ensure that all eligible customers are enrolled in the LIRA / CAP program. By ruling issued in R.17-06-024, water and energy utilities were directed to meet and confer regarding LIRA / CAP data exchanges and report back their recommendations. The water and energy utilities agreed to share data up to and no more than four times a year. Cal Water proposes an additional data exchange with energy utilities in 2021 (to three times this year), and increasing that frequency to quarterly for 2022, assuming cooperation by the energy companies.

Customers will be notified of this change at least 30-days prior to the expiration of the CPUC's

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<sup>16</sup> SB 998, Dodd. Discontinuation of residential water service: urban and community water systems, September 28, 2018, requires that customers be delinquent for at least 60-days prior to disconnection. Incorporating this law into Cal Water's then existing 19-day delinquent policy yields a minimum 79-day period before disconnection.

<sup>17</sup> In D.20-08-047, dated August 27, 2020, the Commission ordered all water utilities to change the name of their low-income assistance programs to "Customer Assistance Program" at the time of filing of their next General Rate Case or GRC. Cal Water currently uses the acronym LIRA for its low-income ratepayer assistance program. Cal Water's next GRC filing is scheduled for July 2021.



## Emergency Customer Protections.

### **F. Resumption of Disconnects for Non-Payment**

In compliance with Governor Newsom's Executive Order N-42-20, Cal Water has suspended shut-offs for nonpayment for all customers, and has worked to reconnect customers who had been disconnected for nonpayment since February 27, 2020.

Cal Water remains committed to working with its customers through the transition period as the Emergency Customer Protections expire and normal business activities resume. Cal Water recognizes the on-going impact of COVID-19 on customer's finances and health and the company does not desire to potentially aggravate any customer's situation by disconnecting water service. In this spirit, Cal Water plans to strategically resume the regulated disconnection process once the disconnection moratorium is lifted and the consumer protections expire, whichever date is later

Cal Water's Tariff Rule No. 11, effective February 1, 2020, contains robust pre-disconnection customer protections prescribed by SB 998. Once normal disconnection procedures resume, Cal Water will follow all existing consumer protections including, allowing residential customers<sup>18</sup> a total of 79 days to make bill payment prior to disconnection, sending payment reminders by letter and proactive outbound calls, a petition mechanism for utility review and CPUC appeal, residential health and safety exemptions, as well as tenant notifications in landlord disconnections. Cal Water will also provide information to customers with respect to low-income assistance programs, payment arrangement options, and arrearage management plans.

### **G. Collections Communication**

Under Cal Water's Transition Plan, Cal Water will issue a notice informing customers of the impending lifting of the disconnection moratorium no less than 30 days beforehand. All residential customers who have arrears at the time of the communication that could subject them to disconnection, including LIRA/CAP customers, will be mailed or e-mailed this letter, depending on the customer's indicated preference, reminding them of the need to stay current on their bills and providing information on how to contact Cal Water to enroll in available programs, if needed.

After the disconnection moratorium is lifted, to ensure there is adequate time for customers to receive notice and make payment arrangements as necessary, Cal Water will wait an additional 30-days prior to resuming normal business practices for disconnects. Cal Water will then follow its Tariff Rule No. 11 provisions for disconnections, along with the noticing requirements contained in Tariff Rule No. 8, which offers a 79-day period for bill payment / payment

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<sup>18</sup> Non-residential customers are afforded at least a 10-day notice.



arrangement prior to disconnection for residential customers. Both the pre-notice and grace period will allow for a smoother transition for customers as Cal Water resumes normal business practices.

## **H. Marketing, Education, and Outreach Strategy**

Cal Water's Marketing, Education, and Outreach Strategy is designed to support Cal Water's 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 with other CPUC-regulated water utilities.

### **(1) Audiences**

The ME&O Strategy is intended to reach both customers at large and specifically targeted categories of customers as follows:

- Customers enrolled in bill management programs
- Customers with arrears
- Customers who may qualify for disconnection preventions due to medical needs pursuant to SB998
- Customers on assistance programs

### **(2) ME&O Activities for All Customers (At Large, Across All Class A & B Water Utilities) & Key Messages**

Cal Water will leverage ongoing communication channels to educate and engage customers about:

- Expiration of CPUC Emergency Customer Protections enacted during the COVID-19 crisis
- Ending of State protections (e.g., Shutoffs for Non-Payment (SONP) moratorium - prepared and distributed date SONPs to resume is announced)
- Programs available to help customers maintain service (payment arrangements, payment extensions, and arrearage management plans.)
- Water efficiency and rebate programs that can help customers use less water and, therefore, reduce their water bill
- Information about the extension of customer protections, where necessary

Tools for implementation statewide across all regulated water utilities include:

- Bill inserts



- Customer service talking points and training
- Automated phone message prompt (i.e. during welcome/on-hold messages)
- Office signage (when reopened to the public)

### **(3) Targeted Outreach**

Additionally, Cal Water will undertake specific, proactive outreach to targeted customers as listed above under “audiences.” Tools will include the following:

- Phone calls (automated or manual)
- Emails or direct mail

Targeted outreach will convey the following information, as appropriate:

- Information about pending changes to a customer’s service status (in accordance with SB 998) or program enrollment (LIRA/CAP) 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, to include date SONPs will be reinstituted
- Bill assistance programs
- Application of reconnection and other fees to a customer
- Noticing of risk of disconnection (termination letter 25 days prior to shutoff, door hanger 10 days prior shutoff)
- Information about qualifying for disconnection preventions due to medical needs pursuant to SB 998

### **(4) Additional ME&O Activities and Tools by Large Class A Companies**

Additional channels for customer communication and targeted outreach that may be undertaken by larger Class A utilities (including Cal Water), as resources allow, are:

- Company web site
- Social media
- News releases to local media
- Virtual community meeting
- Direct contact at customer residence (i.e. door hangers)
- Materials in multiple languages (according to customer demographics)
- Advertising (print, social media, or other)
- Phone logistics – ensure company name appears on Caller IDs so customers don’t think they’re being scammed



### i) Partnerships

- **Partnership Activities By Individual Water Utilities** – Cal 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.
- **Industry-wide Partnership Activities** – California Water Association will also assist Cal Water and other water utilities in coordinating 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
  - Cal Water proposes to increase the frequency of data sharing with energy companies to identify potential customers who could benefit from water utility assistance programs (see Section D, above).
  - Services by diverse suppliers to assist Cal Water in implementing customer ME&O activities and tools

### (5) Detailed ME&O Targeted to Low-Income Customers

Cal Water will undertake the following specific activities designed to reach low-income customers:

- Information about CAP/LIRA enrollment status and any recertifications needed sent directly to CAP/LIRA-enrolled customers
- Additional data exchanges with energy utilities to automatically enroll those eligible for LIRA, along with letters to those who may qualify based on partial similar data
- Conservation programs, particularly Cal Water's new Smart Landscape Tuneup Program that enables outdoor irrigation leaks to be fixed at no cost to the customer, sent directly to CAP/LIRA-enrolled customers
- Pilot partnership program with CBOs in selected socioeconomically disadvantaged districts to publicize Cal Water assistance programs and track need for information
- Rental and utility bill assistance programs offered by counties and the State sent via multiple channels; below are programs established and being publicized to date

District	Description	Channels	URL
<b>Selma – all residents</b>	Fresno County resident utility aid grant (through March 19)	Social media, email	<a href="https://bit.ly/3eHCKVg">bit.ly/3eHCKVg</a>
<b>Kern River Valley, Bakersfield</b>	Kern County rental assistance program (now	Social media, email, bill	<a href="https://rup.kernha.org">rup.kernha.org</a>





	through end of year or until funds depleted)	onsert April cycle	
<b>Stockton</b>	City of Stockton past-due rent & utilities assistance (now through April 30)	Social media, email	<a href="http://stocktonca.gov/RentHelp">stocktonca.gov/RentHelp</a>
<b>Antelope Valley, Bay Area Region, Bear Gulch, Chico, Dixon, East LA, Livermore, Los Altos, Marysville, Oroville, Visalia, Westlake</b>	Statewide renter assistance program (4/1/2021 – 3/31/2022)	Social media, email, bill onsert April cycle	<a href="http://HousingIsKey.com">HousingIsKey.com</a> (onsert) <a href="https://housing.ca.gov/covid_rr/program_overview.html">https://housing.ca.gov/covid_rr/program_overview.html</a>
<b>Selma</b>	Fresno County rental assistance program	Social media, email	To come
<b>Salinas, King City</b>	Monterey County rental assistance program (until funds run out)	Social media, email	<a href="http://www.unitedwaymcca.org/county-rent-and-utility">www.unitedwaymcca.org/county-rent-and-utility</a>
<b>Livermore</b>	Alameda County (until funds run out)	Social media, email	<a href="http://www.ac-housingsecure.org">www.ac-housingsecure.org</a>
<b>Marysville</b>	Yuba-Sutter Economic Development Corp	Social media, email, bill onsert	To come

## **I. Costs**

Cal Water's ME&O strategy plans to utilize existing outreach and marketing budgets, with additional redirects from conservation program budgets when feasible. Cal Water does not have a separate budget for low-income programs.

Should direct mail become required, the additional cost may need to be recovered. Direct mail to all Cal Water customers costs about \$200,000, including postage. Direct mail to a targeted group of customers would cost less; however, emailing where possible will reduce that cost.

## **J. Compliance and Safety**

Cal Water recognizes the substantial financial hardships that many of its customers have been enduring due to COVID-19 and we remain committed to assisting our customers throughout the evolving pandemic and the transition from customer protections. We are committed to keeping and enrolling low-income and newly low-income customers in eligible programs and will continue increase CARE data exchanges with our energy utility partners to ensure that no customer is left behind.

As a 24-hour-per-day, 7-days-a-week utility, Cal Water is committed to the safety of its employees and customers. Cal Water's goal is to exceed state and local health orders, and the



company considers the most stringent of these requirements as a minimum safety floor. To that end, Cal Water has instituted a number of safety measures throughout its field offices including; (1) mass rollout of personal protective equipment (PPE) and temperature screening at all locations, (2) employee 15-days paid COVID-19 leave for direct exposures and childcare needs, (3) work “pandemic pods” to minimize employee interaction across functional areas, and (4) allowing employees to work from home to the maximum extent possible. All employee / customer interactions comply with the safety guidelines of the Centers for Disease Control (CDC), including the wearing of masks by employees, maintaining a 6-foot separation, and minimizing one-to-one interaction time.

Cal Water will report the number and percent of customers who are projected to be facing disconnection after expiration of the Governor’s Executive Order N-42-20.

### **K. Progress Tracking and Reporting Plan**

Despite the transition plan activities and assistance programs cited above, there is continuing uncertainty over the magnitude and duration of economic hardship caused by the pandemic. In this situation it would be appropriate for the Commission to continue to monitor the situation after lifting the disconnection moratorium and customer protections by reviewing monthly reports for progress tracking and reporting.

Cal Water plans to track and report on the transition plan activities using existing reporting tools along with new reports as needed, including:

1. Monthly data reports regarding customers arrearages as part of the water low-income rate assistance rulemaking proceeding R.17-06-024
2. Number of newly enrolled customers that are able to stay on the LIRA/CAP program after the moratorium is lifted (for a period of one year)
3. Number of customers enrolled in alternative payment arrangements
4. Customers disconnects and reconnections, including:
  - a. Number and percentage of disconnections for households enrolled in the AMP Program
  - b. Number and percentage of disconnections for households enrolled in the CAP/LIRA program
  - c. Number and percentage of disconnections for households enrolled in the AMP Program and the CAP/LIRA program
5. To the extent the information is available to Cal Water, number and amount of Housing and Community Development (HCD) payments applied to customers’ bills.

### **Requested Effective Date**

As required by Resolution M-4849, this advice letter is being filed as Tier 2 advice letter. Cal Water requests an effective date of **July 1, 2021**.



### **Notice**

Customer Notice – There is no customer notice requirement associated with this advice letter.

Service Lists – In accordance with General Order 96-B, General Rule 4.3 and 7.2 and Water Industry Rule 4.1, a copy of this advice letter will be transmitted ***electronically*** on **April 1, 2021** to competing and adjacent utilities and other utilities or interested parties having requested such notification. ***Please note that, consistent with the Commission's guidelines for service during the COVID-19 pandemic, this advice letter is only being distributed electronically.***

### **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 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 advice letter process does not provide for any responses, protests or comments, except for the utility's reply, after the 20-day comment period. 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 by mail (or e-mail) to us, addressed to:



**CALIFORNIA WATER SERVICE COMPANY**

Advice Letter 2407, COVID Transition Plan

Page 16

Natalie Wales  
California Water Service Company  
1720 North First Street,  
San Jose, California 95112  
[cwsrates@calwater.com](mailto:cwsrates@calwater.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 10 business days, contact California Water Service Company at 408-367-8200.

CALIFORNIA WATER SERVICE COMPANY

A handwritten signature in cursive script, appearing to read "Natalie Wales".

Natalie Wales  
Director of Regulatory Policy and Compliance

cc: Syreeta Gibbs (Public Advocates Office)  
[PublicAdvocatesWater@cpuc.ca.gov](mailto:PublicAdvocatesWater@cpuc.ca.gov)

## **ATTACHMENT 1**

### **Tariff Schedule Changes**

**Attachment 1 - Tariff Schedule Changes**

<b>Advice Letter 2407</b>			
New/Revised CPUC	Title of Sheet	Schedule No.	Cancelling CPUC
XXXXX-W	Rendering and Payment of Bills p.1	Rule No.9	XXXXX-W
XXXXX-W	Rendering and Payment of Bills p.2	Rule No.9	XXXXX-W
XXXXX-W	Rendering and Payment of Bills p.3	Rule No.9	XXXXX-W
XXXXX-W	Rendering and Payment of Bills p.4	Rule No.9	XXXXX-W
XXXXX-W	Rendering and Payment of Bills p.5	Rule No.9	NEW
XXXXX-W	Rendering and Payment of Bills p.6	Rule No.9	NEW
XXXXX-W	Customer Assistance Program Balancing Account p.1	Preliminary Statement AJ	XXXXX-W
XXXXX-W	Customer Assistance Program Balancing Account p.2	Preliminary Statement AJ	NEW
XXXXX-W	Customer Assistance Program Memorandum Account	Preliminary Statement H	XXXXX-W
XXXXX-W	Table of Contents -- Page 12	TOC 12	XXXXX-W
XXXXX-W	Table of Contents -- Page 4	TOC 4	XXXXX-W
XXXXX-W	Table of Contents -- Page 2	TOC 2	XXXXX-W
XXXXX-W	Table of Contents -- Page 1	TOC 1	XXXXX-W

**Table of Contents - Page 1**

The following listed tariff sheets contain all effective rates and rules affecting the rates and service of the Utility together with information relating thereto:

<u>Sheet</u>	<u>Subject Matter</u>	<u>Service Area</u>	<u>Schedule No.</u>	<u>CPUC Sheet No.</u>
	Title Page			5613-W
	Table of Contents			
Page 1	Table of Contents			XXXXX-W (C)
Page 2	Preliminary Statements			XXXXX-W (C)
Page 3	Preliminary Statements			12514-W
Page 4	Preliminary Statements			XXXXX-W (C)
Page 5	Rate Schedules - All Districts			12509-W
Page 6	Rate Schedules - District Specific			12465-W
Page 7	Rate Schedules - District Specific			12464-W
Page 8	Rate Schedules - District Specific			12463-W
Page 9	Rate Schedules - District Specific			12476-W
Page 10	Rate Schedules - District Specific			12461-W
Page 11	Service Area Maps			12337-W
Page 12	Rules			XXXXX-W (C)
Page 13	Rules			12508-W
Page 14	Sample Forms			12311-W
Page 15	Sample Forms			2926-W

(continued)

(To be inserted by utility)  
Advice Letter No. 2407  
Decision No. \_\_\_\_\_

Issued by  
GREG A. MILLEMAN  
Name  
Vice President  
TITLE

(To be inserted by CPUC)  
Date Filed \_\_\_\_\_  
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Preliminary Statements

<u>Sheet</u>	<u>Subject Matter</u>	<u>Service Area</u>	<u>CPUC Sheet No.</u>
<u>Preliminary Statements</u>			
A	Territory Served by the Territory Served by the Utility		
	Page 1		12250-W
	Page 2		8212-W
B-D	Types and Classes of Service, Procedure to Obtain Service, and Symbols		610-W
H	Customer Assistance Program (CAP) Memorandum Account		XXXXX-W (C)
M	Water Revenue Adjustment Mechanism/ Modified Cost Balancing Account (WRAM/MCBA)		
	Page 1		12148-W
	Page 2		12149-W
	Bakersfield	BK	12446-W
	Bay Area Region	BAR	12445-W
	Bear Gulch	BG	12447-W
	Chico	CH	12350-W
	Dixon	DX	12351-W
	Dominguez	DOM	12448-W
	East Los Angeles	EL	12449-W
	Hermosa Redondo	HR	12367-W
	Kern River Valley	KRV	12450-W
	Livermore	LV	12451-W
	Los Altos	LS	12452-W
	Los Angeles County Region	LAR	12368-W
	Marysville	MR	12453-W
	Salinas Valley Region	MOR	12454-W
	Oroville	OR	12455-W
	Palos Verdes Peninsula Water Reliability Project	PV Pipeline	12469-W
	Selma	SL	12457-W

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**Preliminary Statements**

<u>Sheet</u>	<u>Subject Matter</u>	<u>Service Area</u>	<u>CPUC Sheet No.</u>
<u>Preliminary Statements (continued)</u>			
AI	Chromium 6 Memorandum Account (CHROMIUM-6 MA)		
	Page 1		12501-W
	Page 2		12502-W
AJ	Customer Assistance Program Balancing Account (CAP BA)		(C)
	Page 1		(C)
	Page 2		(N)
AM	Rate Support Fund Balancing Account (RSF BA)		
	Page 1		12482-W
	Page 2		12483-W
AN	Infrastructure Memorandum Account (IMA)		10447-W
AO	Memorandum Account Water Contamination (WCL MA)		10448-W
	Litigation		
AP	General District Balancing Accounts (District BAs)		10449-W
AR	Sales Reconciliation Mechanism Balancing Account (SRM BA)		10467-W
AS	Asbestos Remediation Memorandum Account		
	Page 1		12503-W
	Page 2		12504-W
AT	School Lead Testing Memorandum Account (SLTMA)		11359-W
AU	Phase 1 Sites Reservoir Memorandum Account (PHASE 1 SITES MA)		11468-W
AV	2018 Tax Accounting Memorandum Account (TAMA)		12505-W
AX	Lead Service Memorandum Account (LSMA)		12016-W
AY	Public Safety Power Shut-Off (PSPS) Memo Account (PSPS MA)		
	Page 1		12152-W
	Page 2		12153-W
AZ	2018 GRC Interim Rate Memorandum Account (2018 IRMA)		
	Page 1		12156-W
	Page 2		12157-W
	Page 3		12158-W
	Page 4		12159-W
BA	Polyfluoroalkyl Substances (PFAS) Memorandum Account		12313-W

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**RULES**

<u>Sheet Subject Matter</u>	<u>CPUC Sheet No.</u>
List of Contracts and Deviations	
Page 1	2521-W
Page 2	2522-W
Page 3	2523-W
Page 4	5242-W
Page 5	12479-W
<u>Rules</u>	
No. 1 Definitions	
Page 1	12284-W
Page 2	2984-W
No. 2 Descriptions of Services	1485-W
No. 3 Application for Service	
Page 1	10415-W
Page 2	5065-W
No. 4 Contracts	642-W
No. 5 Special Information Required of Forms	
Page 1	12286-W
Page 2	12287-W
Page 3	12288-W
Page 4	12289-W
No. 6 Establishment and Re-establishment of Credit	643-W
No. 7 Deposits	
Page 1	10418-W
No. 8 Notices	
Page 1	12290-W
Page 2	12291-W
Page 3	12292-W
Page 4	12293-W
No. 9 Rendering and Payment of Bills	
Page 1	XXXXX-W (C)
Page 2	XXXXX-W (C)
Page 3	XXXXX-W (C)
Page 4	XXXXX-W (C)
Page 5	XXXXX-W (N)
Page 6	XXXXX-W (N)
No. 10 Disputed Bills	
Page 1	12294-W
Page 2	12295-W
No. 11 Discontinuance and Restoration of Service	
Page 1	10425-W
Page 2	12297-W
Page 3	12298-W
Page 4	12299-W
Page 5	12300-W
Page 6	12301-W
Page 7	12302-W
Page 8	12303-W
Page 9	12304-W
Page 10	12305-W
Page 11	12306-W
No. 12 Information Available to the Public	
Page 1	10428-W
Page 2	4340-W
No. 13 Temporary Service	
Page 1	3892-W
Page 2	3893-W

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Page 1

(L)

**Rendering and Payment of Bills**

(L)

**A. Rendering of Bills**

(L)

Bills for service will be rendered to each customer on a monthly or bimonthly basis at the option of the utility, unless otherwise provided in its rate schedules.

At the customer's request and the utility's approval, paper bills, electronics bills, or access to electronic bills for service will be rendered monthly, bimonthly or at other intervals.

**1. Metered Service**

a. Meters will be read at regular intervals for the preparation of periodic bills and as required for the preparation of opening bills, closing bills, and special bills.

b. The opening bills for metered service will not be less than the established monthly minimum or readiness-to-serve charge for the service. Any amount paid in excess of the prorated charges otherwise applicable to the opening period will be credited against the charge for the succeeding regular billing period, except that no such credit shall accrue if the total period of service is less than one month.

(T)

(T)

(T)

c. It may not always be practicable to read meters at intervals which result in billing periods of equal number of days.

(T)

(1) Should a monthly billing period contain less than 27 days or more than 33 days, a pro rata correction in the amount of the bill we made.

(2) The charge for metered service for a bimonthly period will be computed by doubling the monthly minimum or readiness-to-serve charge and the number of cubic feet to which each block rate is applicable on a monthly basis.

(3) For billing periods other than monthly or bimonthly, adjustments will be made proportionate to that for a monthly billing period.

d. Bills for metered service will show at least the reading of the meter at the end of the period for which the bill rendered, the meter constant, if any, the number and kinds of units, and the date of the current meter reading.

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(Continued)

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Page 2

**Rendering and Payment of Bills**

A. Rendering of Bills (continued)

1. Metered Service (continued)

- e. Each meter on a customer's premises will be considered separately and the readings of two or more meters will not be combined, except where combination of meter readings is specifically provided for in the applicable rate schedule, or where the utility's operating convenience or necessity may require the use of more than one meter or a battery of meters. In the latter case, the monthly minimum or readiness-to-serve charge will be prorated from the monthly minimum or readiness to serve charges of the applicable rate schedule upon the basis of a meter size equivalent in the diameter to the total combined discharge areas of such meters.

2. Flat Rate Service

- a. Bills for flat rate service are payable in advance.
- b. The opening bill for flat rate service will be the established monthly charge for the service. Any amount paid in excess of the prorated charges otherwise applicable to the opening period will be credited against the charge for the succeeding regular billing period, except that no such credit shall accrue if the total period of service is less than one month.
- c. For billing periods other than monthly, the charge for flat rate service will be computed by multiplying the monthly charge by the number of months in the billing period.

3. Proration of Bills

- a. The charges applicable to opening periods, closing bills and bills rendered for periods corresponding to less than 27 days or more than 33 days for monthly billing periods will be computed as follows:

(1) Metered Service

The amount of the minimum charge (and the quantity allowed therefor) or the readiness-to-serve charge and the quantity in each of the quantity rate blocks will be prorated on the basis of the ratio of the number of days in the

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**Rendering and Payment of Bills**

3. Proration of Bills (Continued)

period. The measured quantity of usage will be applied to such prorated amounts and quantities.

(2) Flat Rate Service

The billing period charge will be prorated on the basis of the ratio of the number of days in the period to the number of days in an average billing period.

(3) Average Billing Period

The number of days in an average billing period is defined as 365 divided by the number of billing periods in a year. (It is 30 days for a monthly billing period).

(4) Electronic Bill Presentation and Payment

At the mutual option of the Customer and Cal Water, the Customer may elect to receive, view, and pay regular bills for service electronically and to no longer receive paper bills and legal and mandated notices.

Customers requesting this option may be required to complete additional forms and agreements. Legal and mandated notices shall be included with Cal Water's electronic transmittal; except, however, all notices of termination of service for nonpayment shall be delivered by U.S. Mail. Either party may discontinue Electronic Billing upon 30 days prescribed notice.

B. Payment of Bills

1. Bills for service are due and payable upon presentation. Collection of closing bills may be made at the time of presentation. Payment may be made to any representative of the utility authorized to make collections. Payment may also be made:

- (a) through a third-party operated pay-by-phone service available through an 800-number;
- (b) at Cal Water's local customer service center;
- (c) through Cal Water online at [www.calwater.com](http://www.calwater.com); and

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(To be inserted by utility)

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**Rendering and Payment of Bills**

B. Payments of Bills (continued)

(L)

(d) through third party vendors.

Options (a) through (c) include both one-time payments and a recurring bill payment option. If a customer signs up for e-billing, all future paper bills will also be suppressed in accordance with Rule 9.A.4.

2. Bills for customers under the utility's Automatic Payment Service (APS) are due and payable monthly in accordance with the utility's approved payment schedule.

3. All credit card and debit card payment options will be available to all customers.

(D)

C. Customer Checks or Electronic Fund Transfer Not Honored

The utility may charge \$10.00 for any bad check or electronic fund transferred not honored.

(L)

D. One-Year Debt Forgiveness Program (Arrearage Management Payment Program)

(N)

The Arrearage Management Payment (AMP) Program is a temporary debt forgiveness payment option available to eligible customers, and is open for enrollment for one year, from [date] to [date].

The temporary program is intended to help customers recover from financial hardship worsened by the COVID-19 pandemic.

After enrollment in the program, one-twelfth (1/12) of a participant's eligible overdue debt will be forgiven after each on-time payment of one month's worth of current water charges. (For bi-monthly bills, an on-time payment of the bill will provide forgiveness for two-twelfths (2/12) of the eligible debt.)

If a statewide or federal program that provides debt assistance to customers is implemented prior to expiration of the AMP Program, the statewide or federal program will replace the AMP program.

(N)

(Continued)

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**Rendering and Payment of Bills**

D. One-Year Debt Forgiveness Program (continued)

(N)

1. AMP Program Eligibility and Enrollment Criteria

a) A customer is eligible for participation in the AMP Program if:

- i) A customer has an individually metered residential account, and is enrolled in the Customer Assistance Program (CAP). (The CAP was formerly known as the Low-Income Ratepayer Assistance (LIRA) program.)
- ii) The overdue amount on the customer's water account is more than [\$ amount], a part of which is older than 90 days;
- iii) The customer has had a Cal Water account for at least 6 months, and has made at least one (1) full on-time payment (full payment of all water charges within 30 days of bill date) within the last 24 months; and,
- iv) In the prior 12-month period, the customer's water use must not exceed twice the amount of the annual residential consumption per customer the Commission has adopted for the customer's area.

b) An eligible customer can become a participant in the AMP Program in any month during the enrollment period. A participant may not re-enroll if removed from the program.

c) Participants will not have service discontinued for nonpayment while enrolled in the AMP Program.

d) A participant who stops receiving benefits from the CAP (formerly the LIRA program) may remain in the AMP Program.

2. Debt Forgiveness

a) After enrollment, one-twelfth (1/12) of the participant's debt eligible for forgiveness will be forgiven after each on-time payment is made for one month's worth of current charges. (For bi-monthly bills, an on-time payment of the bill will provide forgiveness for two-twelfths (2/12) of the eligible debt.)

b) The amount of the participant's debt that is eligible for forgiveness is determined at the time of enrollment, but may not exceed [\$ amount] in total. Only charges for water service can considered debt eligible for forgiveness.

(N)

(Continued)

(To be inserted by utility)

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**Rendering and Payment of Bills**

D. One-Year Debt Forgiveness Program (continued)

(N)

2. Debt Forgiveness (continued)

- c) After on-time payments for twelve months of current charges, all eligible debt will be forgiven. Any remaining overdue amounts are owed to the utility.
- d) Any payment received while the participant is in the AMP program will be applied toward current charges, and will not be applied to any overdue debt. If a payment is received in excess of current charges, the excess will be applied to future charges.
- e) Current charges that are not paid on time:
  - i) A participant may miss one on-time payment of a bill and remain in the program, as long as the next payment is on time, and is made for an amount that includes both the current charges and the previous bill's overdue charges.
  - ii) A participant may miss an on-time payment of a bill twice during the 12-month program. Missing a payment a third time will result in removal from the program.
  - iii) A participant who misses two on-time payments in a row will be removed from the program.
- f) If a participant is removed or drops out from the program, the debt that has been forgiven is still considered forgiven. All remaining eligible debt, and any debt that was ineligible for forgiveness, is owed to the utility.

(N)

(To be inserted by utility)

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Preliminary Statement

Page 1

**AJ. Customer Assistance Program Balancing Account (CAP BA)**

(L)(T)

**1. PURPOSE**

The purposes of this balancing account are to track the CAP credits provided, to track the CAP surcharges collected, and to adjust the CAP surcharges on January 1 of each year.

(T)

(T)

The CAP BA will also track in a temporary Arrearage Management Plan (AMP) Sub-account all eligible debt forgiven through the debt forgiveness payment plan described in Rule 9.D.

(N)

(N)

(N)

**2. TIMING AND FREQUENCY**

An advice letter to adjust the CAP surcharges will be filed by October 31<sup>st</sup> of each year. The adjusted surcharge will be calculated to zero out the forecasted balance anticipated to be in the account at the end of that year, as well as in the account at the end of the following year.

(T)

**3. ANNUAL SURCHARGE ADJUSTMENT: Calculation of the adjusted surcharge will reflect:**

a. A forecast of the December 31<sup>st</sup> balance in the CAP BA for the current year that reflects:

(T)

i. The most recent recorded balance;

ii. The assumption that the proportion of CAP to non-CAP residential enrollment in September will remain constant as a proportion of adopted numbers for October through December; and

(T)

iii. The assumption that current CAP surcharges will be applied to the estimated non-CAP portion of adopted sales (adopted sales minus estimated CAP sales based on the proportion of CAP to non-CAP residential customers in September), plus interest;

(T)

(T)

(T)

b. A forecast of the December 31 balance in the CAP BA for the following year that reflects:

(T)

i. The assumption that the proportion of CAP to non-CAP residential enrollment in September of the previous year will remain constant as a proportion of adopted numbers; and

(T)

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Page 2

**AJ. Customer Assistance Program Balancing Account (CAP BA) (continued)**

(L)(N)

3. ANNUAL SURCHARGE ADJUSTMENT:(continued)

(N)

- ii. The assumption that the new surcharges will be applied to the estimated non-CAP portion of adopted sales (adopted sales minus estimated CAP sales based on the proportion of CAP to non-CAP residential customers in September of the previous year), plus interest; and

(T)

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(T)

(T)

- c. The most recent recorded balance in the AMP Program Sub-account.

(N)

4. ACCOUNTING PROCEDURE: The CAP BA will reflect the following entries:

(T)

- a. The recorded CAP customer credits for service provided under Schedule No. CAP (debit);
- b. The recorded AMP Program customer credits provided pursuant to Tariff Rule 9 (debit);
- c. The recorded surcharges collected from non-CAP customers (credit); and
- d. Monthly interest expense calculated at 1/12 of the most recent month's interest rate on Commercial Paper (prime, 90 day), published in the Federal Reserve Statistical Release (debit or credit).

(T)

(N)

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Page 1

**H. Customer Assistance Program Memorandum Account (CAP MA)**

1. PURPOSE: The purpose of this memorandum account is to track the incremental costs of the Customer Assistance Program (CAP) (formerly the Low Income Ratepayer Assistance program) and the temporary Arrearage Management Plan (AMP) Program.

2. ACCOUNTING PROCEDURE: The following entries will be made monthly to the CAP MA:

a. Incremental CAP costs of any new Commission requirements that impact the CAP program not reflected in authorized rates, with one-time and ongoing costs identified separately (debit);

b. Incremental AMP Program costs not reflected in authorized rates, with one-time and ongoing costs identified separately (debit); and,

c. Monthly interest expense calculated at 1/12 of the most recent month's interest rate on Commercial Paper (prime, 90-day), published in the Federal Reserve Statistical Release (debit or credit).

3. RATE RECOVERY: There is currently no ratemaking component to the CAP MA.

Request for recovery of any balance will be processed according to General Order 96-B (or its successor) and Standard Practices or requested in a general rate case.

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(N)

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(N)

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Date Filed

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Resolution



## Antelope Valley District (Los Angeles Region)

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

JACK L. CHACANACA  
**Leona Valley Cherry Growers Association**  
26201 Tuolumne St  
Mojave, CA 93501

JOSEPH S. LUCIDO  
**Leona Valley Cherry Growers Association**  
26201 Tuolumne St  
Mojave, CA 93501

PEGGY FULLER  
**Leona Valley Town Concil**  
P.O. Box 795  
Leona Valley, CA 93551  
[pfuller@leonavalleytc.org](mailto:pfuller@leonavalleytc.org)

LAURA FERNANDEZ  
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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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## Bay Area Region

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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## Chico District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST

PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST

PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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### Livermore District

ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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ADVICE LETTER FILING MAILING LIST  
PER SECTION III (G) OF GENERAL ORDER NO. 96-A

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