CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS

Advice Letter Cover Sheet

Utility Name: Liberty Utilities (Park Water) Corp.

District: N/A

CPUC Utility #: U 314-W

Advice Letter #: 314-W

Tier ☐1 ☒2 ☐3 ☒ Compliance

Authorization Resolution M-4849, Ordering Paragraph 5

Description: COVID Transition Plan

Date Mailed to Service List: April 1, 2021

Protest Deadline (20th Day): April 21, 2021

Review Deadline (30th Day): May 1, 2021

Requested Effective Date: May 1,2021

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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Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

DATE	STAFF	COMMENTS

[ ] APPROVED [ ] WITHDRAWN [ ] REJECTED

Signature: _____ Comments: _____

Date: _____

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FILED
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PUBLIC UTILITIES COMMISSION
WATER DIVISION

Advice Letter No. 314-W

April 1, 2021

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Summary
Liberty Utilities (Park Water) Corp. (U 314 W) ("Liberty Park Water") hereby submits this Tier 2 Advice Letter in compliance with Resolution M-4849, which was adopted by the California Public Utilities Commission (Commission) at its February 11, 2021 voting meeting and issued the next day. In particular, this advice letter complies with Resolution M-4849's directive to Class A water utilities to design a transition plan for the expiration of the Emergency Customer Protections.

Background
On March 4, 2020, in response to the COVID-19 pandemic, Governor Newsom officially proclaimed a State of Emergency in California, and on March 13, 2020, the President of the United States proclaimed a National State of Emergency.

On March 27, 2020, Liberty Park Water notified the Commission's Executive Director that the Company was activating the Emergency Disaster Relief Protections described in Advice Letter ("AL") 297, filed in compliance with Decision ("D.") 19-07-015, to the extent they are applicable during the COVID-19 Emergency ("Emergency Protections"), and that the Company was also activating its Catastrophic Event Memorandum Account ("CEMA") in order to record the extraordinary costs Liberty Park Water is incurring as a result of the COVID-19 Emergency.

By letter dated March 17, 2020, the Commission's Executive director instructed all Commission-regulated investor-owned utilities (IOUs) and service providers subject to D.19-07-015 to extend the same applicable Emergency Protections directed in that decision to customers during the COVID-19 Emergency, and to report to the Commission on all measures they implemented in response to COVID-19 as soon as they are implemented.

On April 2, 2020, Governor Newsom issued Executive Order N-42-20 suspending the authority of water utilities to discontinue service for nonpayment to residential customers and small businesses operating in the critical infrastructure sectors.

On April 16, 2020, the Commission issued Resolution M-4842, ratifying the directives issued by the Executive Director on March 17, 2020, and to retroactively apply the Emergency Protections from March 4, 2020. Resolution M-4842 also required Commission-regulated IOUs to identify any customer protections set forth in D.19-07-015 that are not applicable during the COVID-19 pandemic, and to provide justification as to why they are not applicable.

In compliance therewith, on May 1, 2020 Liberty Park Water filed AL 299-W setting forth the specific provisions of D.19-07-015 that comprise Liberty Park Water's Emergency Protections and which provisions are not applicable during the COVID-19 pandemic.

On February 11, 2021, in response to extraordinary circumstances and the ongoing state of emergency related to the COVID-19 pandemic, the Commission issued Resolution M-4849, extending the Emergency Protections for residential and small business customers through June 30, 2021. Resolution M-4849 also extends the memorandum accounts established and/or activated for the purpose of tracking the incremental costs of complying with the Commission's resolution, and requires IOUs to file Tier 1 advice letters describing all reasonable and necessary actions to extend the emergency Protections through June 30, 2021.

To demonstrate compliance, Liberty Park Water filed AL 311-W on February 22, 2021.

Additionally, Resolution M-4849 requires IOUs to file a Tier 2 AL outlining their transition plans associated with discontinuance of the Emergency Customer Protections after June 30, 2021. Specifically, Ordering Paragraphs 5 and 6 state:

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)…

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.

On February 26, 2021, Liberty Utilities and the other water utilities provided a joint presentation to the Low-Income Oversight Board (LIOB) providing a background of the regulated water utility industry, the implementation of Senate Bill 998, the impact of Governor Newsom's Executive Order N-42-20 as well as a comparison between the utilities' Marketing Education & Outreach plan.

On March 19, 2021 the LIOB provided a list of recommendation to the Commission and utilities on what should be include in each utility's transition plan.

I. TRANSITION PLAN INTRODUCTION

When the pandemic began to adversely impact California, Liberty Park Water voluntarily implemented a disconnection moratorium for its residential and business customers. Liberty Park Water also put in place additional customer protections, such as extending payment

arrangements, and enacted other measures designed to ensure that customers continue to receive water service regardless of their payment status. In compliance with the March 17, 2020 Letter from the Commission's Executive Director and Resolution M-4842, Liberty Park Water filed ALs 297-W and 299-W on March 24, 2020 and May 1, 2020 respectively, confirming compliance with the specific emergency protections and outreach activities in light of the pandemic. The customer protections consist of: (1) suspension of service disconnections for non-payment for residential and business customers; (2) waiving of disconnection or late fees and suspension of security deposits for affected customers; (3) suspension of all California Alternative Rates for Water (CARW) program removals; and (4) discontinuation of generating all recertification and verification requests that require customers to provide their current income information.

Currently, California's COVID-19 daily diagnosis statistics remain high, and many businesses are not operating at full capacity which means that the economy is still exhibiting a downturn. However, the situation has improved since March 2020 in that the Governor, has lifted the most regional stay at home order directive and permitted the reopening of businesses. Of significance, California's unemployment numbers have improved from 15.5% in April 2020 to 9.0% in December 2020. As the pandemic and economic situation has evolved, so does the need to evolve from the emergency customer protections. Other states have moved or are transitioning from disconnection moratoriums and COVID-19 relief protections and have designed transition plans to assist those payment troubled customers with maintaining utility service. Similarly, the California Public Utility Commission has recognized the need to evolve from the COVID-19 Emergency Customer Protections.

Resolution M-4849 requires water IOUs to design a transition plan for the expiration of the Emergency Customer Protections. The transition plan is "to facilitate a smooth transition for customers when the Emergency Customer Protections are lifted." The water IOUs are directed to "design the transition plan to effectively ease customers through a transition off of the Emergency Customer Protections." The transition plan must 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." 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 of programs they are already on.

Recognizing the Commission's goal to effectively transition customers off customer protections, Liberty Park Water proposes the following transition plan ("Transition Plan" or "Plan") that contemplates the resumption of normal business activities, including disconnections for non-payment as of June 30, 2021.

Liberty Park Water recognizes the impact the pandemic has had on our customers, including the newly unemployed, our most vulnerable customers and small businesses, and Liberty Park water has worked to promote relief options to assist customers facing financial hardship. From the beginning of this pandemic, Liberty Park Water has remained committed to helping customers navigate uncertainty and economic hardship. With this Transition Plan, Liberty Park Water's goal is to implement a plan that can assist customers to effectively transition for the short term.

However, none of us know how long we are going to have to live with this pandemic or its economic consequences. Separately from the existing customer protections mandated by the Commission, water IOUs such as Liberty Park Water are also subject to an ongoing moratorium on water service disconnections for non-payment imposed under Executive Order N-42-20. As such, the timing of the Executive Order N-42-20 moratorium may be lifted is uncertain and it is unclear how much notice water utilities may receive in advance of such a date. For these reasons and because of the dynamic nature of the pandemic, Liberty Park Water's implementation of the Transition Plan requires flexibility. Liberty Park Water reserves the right to implement specific provisions of the Transition Plan, including longer term options, based upon the trajectory of the pandemic, the status of the economy, any new information, or Commission directive so that Liberty Park Water and its customers interests continue to be considered.

Liberty Park Water will monitor state and local COVID-19 health orders and governmental directives, and reserves the right, in consultation with Water Division, to postpone implementation of provisions of this Plan as necessary to ensure the safety of Liberty Park Water's employees, customers and the general public.

II. Liberty Park Water Transition Plan

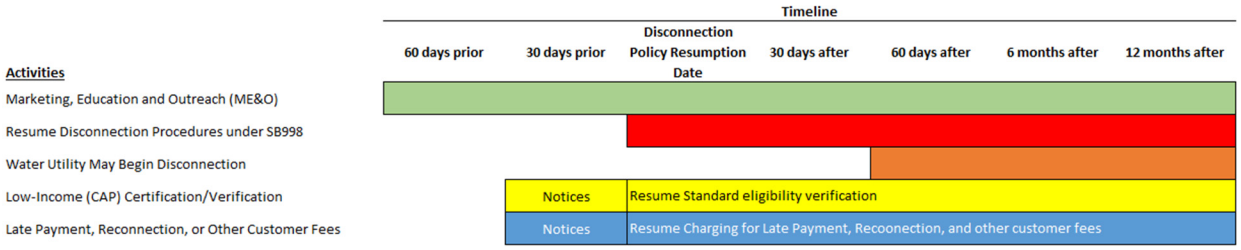
1. Tactical Plan and Activities Timeline

A. Resumption of disconnections for non-payment

Liberty Park Water recognizes the ongoing impact of COVID-19 on customers' finances, health and general wellbeing, and the Company wants to avoid the potential for worsening any customer's situation by disconnecting their water service. The Company remains committed to working with all of its customers through the transition period. Liberty Park Water outlines below how it would cautiously and strategically resume the disconnection process once the moratorium is lifted and the emergency consumer protections expire. Liberty Park Water's plan for resuming disconnections has been designed to protect its vulnerable customers during the ongoing pandemic, particularly low-income customers including those customers who recently meet the low-income criteria.

Separately from the existing customer protections mandated by the Commission, Liberty Park Water is also subject to an ongoing moratorium on water service disconnections for non-payment imposed under Executive Order N-42-20. However, the timing of when the Executive Order N-42-20 moratorium may be lifted ("EO Moratorium Lifting Date") is uncertain and it is unclear how much notice water utilities may receive in advance of such a date. Therefore, the timeline for resumption of disconnections for non-payment set forth below is set around a "Disconnection Policy Resumption Date" on a future date to be determined by the Company, occurring at the latter of July 1, 2021 or the EO Moratorium Lifting Date. Allowing Liberty Park Water to determine the anticipated Disconnection Policy Resumption Date will allow adequate flexibility given the uncertainty in when or how the Executive Order N-42-20 moratorium may be lifted.

The below chart details the timeline and activities of Liberty Park Water's Transition Plan.



60 days prior to Disconnection Policy Resumption Date – Liberty Park Water will begin sending out notices to customers informing them that Liberty Park Water will resume applying standard disconnection procedures under its tariffs on the 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). Liberty Park Water will continue outreach to its customers to setup payment plans prior to the Disconnection Policy Resumption Date to avoid any risk of disconnection.

Disconnection Policy Resumption Date – Liberty Park 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. Liberty Park Water will individually reach out to each customer that has a delinquent bill (as of the Disconnection Policy Resumption Date) and will offer an opportunity to participate in an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment (the type of payment assistance plan will be determined by Liberty Park Water based upon the specific circumstances of the individual customer). If a customer is engaged in one of those types of payment assistance plans and is making timely payments under that plan, they will not be disconnected.

60 days after Disconnection Policy Resumption Date – Liberty Park Water may begin disconnecting customers for non-payment pursuant to the rules and procedures set forth under SB 998 and the applicable tariff rules. Prior to any disconnection for non-payment, Liberty Park Water will provide advance noticing required by SB 998 as follows:

- **At Least 7 Business Days Before Disconnection** – No less than seven business days before discontinuation of residential service for nonpayment, the water utility shall contact the customer named on the account by telephone or written notice pursuant to Health & Safety Code § 116908(a)(1)(A).
- **At Least 10 Calendar Days Before Disconnection (If Applicable)** – For residential occupants of individually metered multi-unit complexes who are not the customer of record, the water utility will send written notice pursuant to Health & Safety Code § 116916(b) at least 10 calendar days prior to any possible disconnection.
- **At Least 7 Calendar Days Before Disconnection (If Applicable)** – For detached single-family dwelling, the water utility will send written notice of termination pursuant to Health & Safety Code § 116916(f)(1) at least 7 calendar days prior to any possible disconnection.

B. Resumption of Verification/Recertification of Eligibility for Customer Assistance Program (CAP)

June 1, 2021 – Liberty Park Water will begin sending out written notices to all CAP customers informing them that Liberty Park Water may resume applying the standard CAP eligibility verification and recertification requirements under its tariffs on July 1, 2021.

July 1, 2021 – Liberty Park Water may resume standard eligibility verification and recertification procedures for CAP customers.

C. Late Payment, Reconnection, or Other Customer Fees

June 1, 2021 – Liberty Park Water will begin sending out written notices to all customers informing them that Liberty Park Water may resume applying the standard late payment, reconnection or other customer fee procedures under its tariffs.

July 1, 2021 – Liberty Park Water may resume applying standard late payment, reconnection, or other customer fees to customer accounts.

D. Payment Plan Options

There will be substantial opportunity for customers to interact with Liberty Park Water for making payment arrangements to maintain their water service, and thus avoid disconnection. This opportunity for interaction is important because throughout the disconnection moratorium, Liberty Park Water has offered payment arrangements. Liberty Park Water intends to continue to offer payment arrangements once the disconnection moratorium is lifted and the emergency customer protections expire.

III. MARKETING, EDUCATION, AND OUTREACH STRATEGY

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

A. Target Audiences

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

- Customers enrolled in bill management programs
- Customers with arrears
- Customers that may qualify for disconnection preventions due to medical needs pursuant to SB 998
- Customers enrolled and/or eligible for on assistance programs including Liberty Park Water's CAP

- Customers considered hard-to-reach and those residing in areas designated as low-income or disadvantaged communities

B. ME&O Activities for All Customers

Liberty Park Water will leverage ongoing communications channels to educate and engage customers about 30 calendar days from the expiration of Emergency Customer Protections enacted during the COVID-19 crisis; programs available to help customers maintain service; water efficiency and rebate programs that can help customers use less water, and therefore reduce their water bill; and where necessary, information about the extension of customer protections.

Liberty Park Water will utilize the following implementation tools: bill inserts, customer service talking points and training, phone messaging prompt (i.e., during welcome/on-hold messages), and office signage (when re-opened to the public).

Liberty Park Water will also utilize emails and social media posts to inform its customers on the Tenant Relief Program through Housingiskey.com to inform all of its customers of the rent and utility relief available to customers.

C. Targeted Outreach

Liberty Park Water will also undertake proactive outreach to targeted customers. Implementation tools may include the following, as appropriate:

- Phone calls (automated or manual) targeted at specific audiences
- Emails or direct mail targeted at specific audiences
- Company Website
- Social media
- News releases to local media
- Virtual community meeting
- Direct contact at customer residence (i.e., door tags)
- Materials in multiple languages
- Advertising (print, social media, or other)

Targeted outreach will convey the following information, as appropriate:

- Senate Bill (SB) Information about pending changes to a customer's service or program enrollment status
- Needed customer actions, including re-certifications, to remain eligible for programs
- Payment plans and options available to help customers maintain service or manage arrearages
- Bill assistance program
- Application of late-payment, reconnection, and other fees to a customer
- Noticing of risk of disconnection
- Information about qualifying for disconnection preventions due to medical needs pursuant

to SB 998

D. Partnerships

Liberty Park Water will perform an additional data exchange with the energy IOUs in 2021—increasing the total to three times this year to identify potential customers who could benefit from Liberty Park Water's CAP program.

E. Incremental ME&O Costs

Resolution M-4849 states "Water IOUs are encourage to leverage existing outreach and marketing budgets, including for conservation programs and low-income programs."

Liberty Park Water plans to utilize existing authorized conservation programs for the ME&O costs and will track any charges associated with the ME&O plan in its CAP and Conservation balancing accounts.

IV. COMPLIANCE AND SAFETY

A. Alignment with Program Enrollment Targets and Requirements

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. On March 4, 2020, Governor Gavin Newsom declared a state of emergency in California as part of its response to the COVID-19 pandemic. On March 13, 2020, President Trump signed an Emergency Declaration to facilitate the federal response to the emerging pandemic. In compliance with D.19-07-015 and Resolution M-4842, Liberty Park Water filed ALs 297-W and 299-W on March 24, 2020 and May 1, 2020 respectively, implementing the applicable emergency customer protections and outreach activities in light of the pandemic. The customer protections consist of: (1) suspend service disconnections for non-payment for residential and business customers; (2) waive disconnection or late fees and suspend security deposits for affected customers; (3) suspend all California Alternative Rates for Water (CARW) program removals; and (4) discontinue generating all recertification and verification requests that require customers to provide their current income information. In compliance with Resolution M-4849, Liberty Park Water filed AL 311-W on February 22, 2021, extending the emergency customer protections to June 30, 2021. Since the start of the pandemic, there has not been any disconnections for Liberty Park Water's customers. Liberty Park Water's customers have been and will continue to receive uninterrupted water service during the customer protections period.

Even when the Commission's Emergency Customer Protections are lifted, there are other customer protections will continue to be in place. The Executive Order N-42-20 implements a moratorium on residential and small business water service disconnections for non-payment. Additionally, SB 998 mandates certain requirements and procedures with respect to disconnections for nonpayment. Liberty Park Water filed AL 296-W on January 8, 2020 to update its tariffs to comply with SB 998. Under SB 998, customers are afforded 60 days from the Disconnection Policy Resumption date to participate in an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment to avoid water service

disconnection.

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

On March 24, 2020, Liberty Park Water filed AL 297-W, detailing the measures the Company has enacted to protect the health and safety of employees and customers. The following are protective measures to safeguard the health and safety of employees and customers:

- Liberty Park Water has a pandemic preparedness plan and a task force that is working with guidance from the Centers for Disease Control and Prevention ("CDC"). This task force has spent several weeks preparing for how the virus might impact the organization and communities served and how to respond appropriately.
- Liberty Park Water continues to monitor the situation and actively share updates and information with employees (weekly or more often as needed) so they can keep themselves, their families, and their community safe.
- Liberty Park Water has deployed social distancing policies, identified key staff, and separated them. Liberty Park Water has instituted a remote workplace separation program for those business functions for which this is practicable.
- Liberty Park Water has implemented deep cleaning in its offices by using third-party disinfection services.
- Liberty Park Water has provided customer service representatives and field personnel with gloves and additional protective supplies and requires social distancing of at least six feet for interactions with customers.
- Liberty Park Water has limited employee travel, suspended in-person meetings, and postponed larger gatherings and events.
- Liberty Park Water requires employees to follow the CDC recommendations on personal safety, such as frequent hand washing and distancing from others who are sick.
- Liberty Park Water requires employees who feel sick or have concerns regarding potential exposure to stay at home.

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."

Background and Protocols for Progress Tracking and Reporting

- Liberty Park Water has been and will continue providing monthly data reports regarding customers arrearages as part of the water low-income rate assistance rulemaking

proceeding R.17-06-024. The monthly data reports consist of CAP and Non-CAP customers: 1) number of customers on payment arrangements, 2) number of customers request for bill adjustments, 3) number of newly enrolled CAP customers, 4) number of enrolled CAP customers, and 5) number of customers with greater than 30 days past due bills and the average, median, minimum, maximum, and overall of arrearages.

- Liberty Park Water will track and report the following metrics outlined below as part of the monthly data reports submitted in rulemaking proceeding R.17-06-024. Liberty Park Water will report such information on a monthly basis for 12-months following the end of the Commission-mandated Emergency Customer Protections through June 30, 2022.
- For the purposes of these metrics, enrollment in the respective CAP programs should be defined as customers being billed pursuant to the respective utility CAP tariffs.

Metrics to Track Continued Enrollment in CAP

- Liberty Park Water will provide the following metrics to track customers 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 Liberty Park Water's CAP program post June 30, 2021.
    - Number and percent of customers required to take actions to remain on Liberty Park Water CAP programs (e.g., recertification, post enrollment verification) that successfully complete those actions.

Metrics to Track Enrollments of Impacted Customers in New Payment Programs

- Liberty Park Water will provide the following metrics to track enrollments of impacted customers in a new payment programs.
    - Number and percentage of customers enrolled in alternative payment arrangements (defined as enrollment in an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment).
    - Number and percentage of customers that are disconnected
    - Change in arrearage amounts (to the extent such information is not already tracked as part of the Rulemaking R.17-06-024 reporting requirements).

Tier Designation

Pursuant to Resolution M-4849, this advice letter is submitted with a Tier 2 designation.

Effective Date

Pursuant to Resolution M-4849, Liberty Park Water requests this filing become effective on May 1, 2021.

Notice and Service

In accordance with General Order 96-B, General Rules 4.3 and 7.2, and Water Industry Rule 4.1, a copy of this advice letter will be electronically transmitted on April 1, 2021 to competing and adjacent utilities and other utilities or interested parties having requested such notification.

During the COVID-19 pandemic, Liberty Park Water can only provide electronic copies of this advice letter to the service list. Pursuant to Water Industry Rule 3.2 of General Order 96-B, public notice is not required.

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 upon 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;
(5) The relief requested in the advice letter requires consideration in a formal hearing or is otherwise inappropriate for the advice letter process; or
(6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require re-litigating a prior order of the Commission.

A protest shall provide citations or proofs where available to allow staff to properly consider the protest. A response or protest must be made in writing or by electronic mail and must be received by the Division of Water 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 by mail (or e-mail) to Liberty Park Water, addressed to:

Edward N. Jackson
Director, Rates and Regulatory Affairs
Liberty Utilities (West Region)
9750 Washburn Road
P. O. Box 7002
Downey, CA 90241
Fax: (562) 861-5902
E-Mail: AdviceLetterService@libertyutilities.com

Cities and counties that need Board of Supervisors or Board of Commissioners approval to

protest should inform the Division of Water and Audits within the 20-day protest period so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

If you have not received a reply to your protest within 10 business days, contact Edward Jackson at (562) 923-0711.

Very truly yours,

LIBERTY UTILITIES (PARK WATER) CORP.

/s/ Edward N. Jackson

Edward N. Jackson
Director, Rates and Regulatory Affairs (West Region)
Edward.Jackson@libertyutilities.com

ENJ/aml