CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS

Advice Letter Cover Sheet

Utility Name: Suburban Water Systems

District: n/a

CPUC Utility #: U – 339-W

Advice Letter #: 353-W

Tier: ☐ 1 ☒ 2 ☐ 3 ☒ Compliance

Authorization: Resolution M-4849

Description: Transition Plans for the Expiration of Emergency Customer Protections

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: June 1, 2021

Rate Impact: n/a

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

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DWA USE ONLY

DATE	STAFF	COMMENTS

[ ] APPROVED [ ] WITHDRAWN [ ] REJECTED

Signature: _____ Comments: _____

Date: _____

FILED
APR 01 2021
PUBLIC UTILITIES COMMISSION
WATER DIVISION

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U-339-W **VIA EMAIL**

ADVICE LETTER NO. 353-W April 1, 2021

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Suburban Water Systems (Suburban) submits this Tier 2 Advice Letter in compliance with Resolution (Res.) M-4849, which was adopted by the California Public Utilities Commission (Commission) at its February 11, 2021 voting meeting and issued the next day. In particular, in accordance with the Resolution this Advice Letter provides a transition plan extending emergency customer protections to support California customers through June 30, 2021, and to file transition plans for the expiration of the emergency customer protections.

Resolution M-4849 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."[1] LIOB input has been included where feasible in this version of Suburban's Resolution M-4849 Transition Plan.

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.[2] 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. 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 of the quality of utility services, the designated water utilities shall file a Tier 1 Advice Letter within 15 days of the Governor's or the President of the United States state of emergency proclamation reporting compliance with implementing this Decision's mandated emergency customer protections and outreach activities.[3] On March 4, 2020, Governor Gavin Newsom (Governor) declared a State of Emergency in response to the outbreak of novel coronavirus, COVID-19.[4] On March 13, 2020, President Trump signed an

[1] Commission Resolution M-4849 at p. 16.
[2] D.19-07-015 at 4.
[3] D.19-07-015 OP 9.
[4] https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/.

Emergency Declaration to facilitate a federal response to the emerging COVID-19 pandemic.[5] On March 16, 2020, Governor Newsom issued Executive Order N-28-20, requesting that the Commission monitor the measures by public and private utility providers to implement customer protections in response to COVID-19.[6] On March 17, 2020, Commission Executive Director Alice Stebbins directed utilities to submit advice letters implementing the applicable customer protections set forth in D.19-07-015 and to apply such protections retroactively to March 4, 2020, when the State of Emergency was declared.[7] On April 16, 2020, the Commission adopted Resolution M-4842, Emergency Authorization and Order Directing Utilities to Implement ECPs to Support California Customers During the COVID-19 Pandemic, directing utilities to offer the protections adopted in D.19-07-015 to all residential and small business customers through April 16, 2021, with an option to extend that date.[8] It instructed Suburban and other water corporations to confirm compliance with the ECPs of Decision (D.) 19-07-15. In compliance with Res. M-4842, Suburban filed Advice Letter 347-W on April 30, 2020. On May 26, 2020, the Commission's Water Division approved Suburban's Advice Letter 347-W. In compliance with Resolution M-4849, Suburban filed Advice Letter 351-W on February 22, 2021 confirming that it will continue to maintain compliance with these ECPs ("ECPs") throughout the pandemic emergency.

I. SUBURBAN'S CUSTOMER FOCUSED OBJECTIVES AND GUIDING PRINCIPLES

Suburban recognizes the substantial financial hardships that many of its customers have been enduring due to COVID-19. On February 1, 2020, prior to the Governor's declaration of a State of Emergency, Suburban implemented new disconnection procedures mandated by Senate Bill 998, which extended the amount of time a customer's bill must be delinquent before service can be discontinued to 60 days. This combined effect of implementing SB 998 and the COVID-19 protections is that Suburban has not disconnected a customer for non-payment since January 31, 2020.

A. Transition Plan Objectives

- Eliminate customer concern that balances accrued during the pandemic emergency will become immediately due and payable;
- Effectively ease customers through a transition from the ECPs to normal disconnection procedures by implementing programs or initiatives relating to bill management;

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[5] https://www.federalregister.gov/documents/2020/03/18/2020-05794/declaring-a-national-emergency-concerning-the-novel-coronavirus-disease-covid-19-outbreak.

[6] https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf.

[7] https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Energy%20Companies%20re%20COVID-19%20March%2017,%202020.pdf. https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Energy%20Companies%20re%20COVID-19%20March%2017,%202020.pdf.

[8] https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M333/K482/333482381.PDF

- Proactively communicate with customers to inform them of changes in ECPs and help enroll them in programs to manage their bills.

B. Transition Plan Guiding Principles

- Simple customer experience;
- Easy to implement;
- Focus on affordability;
- Engage stakeholders and customers.

II. ACTIVITIES TIMELINE

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

- **February 11, 2021** – Resolution M-4849 adopted by the Commission.
- **February 21, 2021** – Suburban filed Tier 1 Advice Letter 351-W demonstrating compliance with the extension of ECPs to June 30, 2021.
- **February 25, 2021** – Suburban to submit draft Transition Plan Advice Letter to the Low Income Oversight Board (LIOB).
- **March 11, 2021** – LIOB to discuss water utility draft Transition Plans during its quarterly meeting.
- **April 1, 2021** – Suburban to submit final Transition Plan Advice Letter that incorporate feedback from LIOB and the Commission's Water Division staff. The water utility begins implementing the ME&O Strategy activities outlined in Section III below.

B. Resumption of Disconnections Policy for Non-Payment

Suburban recognizes the ongoing impact of COVID-19 on its customers' finances, health and general wellbeing. Suburban is committed to working with all of its customers through the transition period. The following discussion explains how Suburban plans to methodically resume the regulated disconnection process once the ECPs expire and the disconnection moratorium is lifted.

IMPORTANT NOTE: Separate from the ECPs mandated by the Commission, water utilities are separately subject to the moratorium on water service disconnections for non-payment imposed under Executive Order N-42-20 ("EO Moratorium"). The Governor has not, however, stated when Executive Order N-42-20 may be modified or terminated to address water service disconnections. Accordingly, water utilities will not be authorized to discontinue service due to non-payment while the EO Moratorium is in place, regardless of the Commission's action on this Advice Letter. This Advice Letter assumes that the EO Moratorium will end coincident with the June 30, 2021 date dictated by M-4849. In the event that Executive Order 42-20 is amended in a manner not consistent with the M-4849 moratorium expiration date, all of the benchmark dates herein will be adjusted accordingly.

The keystone of Suburban's transition plan is to automatically enroll customers with past due balances that are 60 days and greater and over $50.00 into an alternative

payment plan effective July 1, 2021, or the first business day after the EO Moratorium ends. Customers enrolled in this alternative payment plan will not be disconnected for non-payment provided the customer timely pays both the current balance due, and the amount due under the alternative payment plan. The standard payment plan will amortize the past due balance over 12 months. Suburban may adjust the amortization period at the request of the customer, or based on the amount of the past due balance.

SB 998 as implemented by Suburban's Tariff Rule 11 contains robust pre-disconnection customer protections. Once normal disconnection procedures are restored, Suburban will ensure that these customer protections are followed.

Following is a timeline for new activities and customer protections designed to provide a smooth transition for customers:

- **79 days prior to Disconnection Policy Resumption Date – Auto-Enrollment**
  Using the timeline in M-4849 as a benchmark, on July 1, 2021 Suburban will mail auto-enrollment letters to all customers with past due balances that are 60 days and greater and over $50.00. A plan for deferred payments over 12 months will be automatically provided for all past due balances that are 60 days and greater and over $50.00, including more lenient repayment arrangements for customers with existing payment plans irrespective as to whether those existing payment plans are delinquent. Customers are automatically enrolled and the customer experience is intended to be effortless, no reply is required in order to qualify. Suburban may grant a longer repayment period if it finds the longer period is necessary to avoid undue hardship to the customer based on the circumstances of the individual case.[9]

- **60 days prior to Disconnection Policy Resumption Date – Notice of Resumption of Disconnections**
  Using the timeline in M-4849 as a benchmark, on July 20, 2021 Suburban will mail notices to customers informing them that it will resume applying standard disconnection procedures under its tariffs on the Disconnection Resumption Date. The standard disconnection procedures are based on the timeline and requirements established by the Legislature under Senate Bill ("SB") 998 (2018 Water Shutoff Protection Act).

  Disconnection Notice Issuance Dates - Prior to any disconnection for non-payment, Suburban will provide advance noticing required by Rule 8 as follows:
  - **At Least 7 Business Days Before Disconnection** – No less than seven business days before discontinuation of residential service for nonpayment, Suburban shall contact the customer named on the account by telephone or written notice pursuant to Rule 8.A.3.

  - **At Least 10 Calendar Days Before Disconnection (If Applicable)** – For residential occupants of individually metered multi-unit complexes who are not the customer of

[9] SB 998, Section 116910 (D)(2)

record, Suburban will send written notice pursuant to Rule 8.A.3. at least 10 calendar days prior to any possible disconnection.

  - **At Least 7 Calendar Days Before Disconnection (If Applicable)** – For detached single-family dwelling, Suburban will send written notice of termination pursuant to Rule 8.A.3. at least 7 calendar days prior to any possible disconnection.

- **Disconnection Policy Resumption Date** - Using the timeline in M-4849 as a benchmark, Suburban may begin disconnections on September 20, 2021 for customers that have not paid their current bills or payments required under alternative payment arrangements. In addition to easing the transition to normalized dunning procedures, this disconnection policy resumption date considers uncertainties in when or how the Executive Order N-42-20 moratorium may be lifted.

  Suburban will resume standard disconnection procedures under the timeline in accordance with SB 998 and will begin counting the 60-day period for disconnections mandated under Health & Safety Code § 116908(a)(1)(A) for bills that are delinquent (past the due date) back from the Disconnection Policy Resumption Date.

Following is a timeline for additional procedures that will be resumed in order to provide a smooth transition for customers.

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

- **110 days prior to Disconnection Policy Resumption Date** – Using the timeline in M-4849 as a benchmark, on June 1, 2021 Suburban will begin sending out written notices to all CAP customers informing them that Suburban may resume applying the standard CAP eligibility verification and recertification requirements under its tariffs on July 1, 2021.

- **79 days prior to Disconnection Policy Resumption Date** – Using the timeline in M-4849 as a benchmark, on July 1, 2021 Suburban may resume standard eligibility verification and recertification procedures for CAP customers.

Late Payment, Reconnection, or Other Customer Fees

- **110 days prior to Disconnection Policy Resumption Date** – Using the timeline in M-4849 as a benchmark, on June 1, 2021 Suburban will begin sending out written notices to all customers informing them that the water utility may resume applying the standard late payment, reconnection or other customer fee procedures under its tariffs on July 1, 2021.

- **79 days prior to Disconnection Policy Resumption Date** – Using the timeline in M-4849 as a benchmark, on July 1, 2021 Suburban may resume applying standard late payment, reconnection, or other customer fees to customer accounts.

III. MARKETING, EDUCATION, AND OUTREACH STRATEGY

Resolution M-4849 provides that "The IOUs shall include a coordinated, effective, and efficient strategy for their marketing, education, and outreach plan to engage and enroll customers in new bill management programs, to inform customers already enrolled in programs about changes due to the ECPs being no longer in effect after June 30, 2021 (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor's Executive Order N-42-20), and to inform customers of the extension of the customer protections, where necessary."

The following Marketing, Education, and Outreach ("ME&O") Strategy supports the Transition Plan in effectively easing customers through a transition off the ECPs (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 in the CAP program.

B. ME&O Activities for All Customers

- Suburban will leverage ongoing communications channels to educate and engage customers about the June 30, 2021 expiration of ECPs enacted during the COVID-19 crisis; programs available to help customers maintain service; water efficiency and rebate programs that can help customers use less water, and therefore reduce their water bill; and where necessary, information about the extension of customer protections.
- Tools for implementation statewide, across all regulated water utilities, include bill inserts, customer service talking points and training, phone message prompt (i.e. during welcome/on-hold messages), and office signage (when reopened to the public).

C. Targeted Outreach

- In addition, Suburban will engage in proactive outreach to targeted customers. Tools may include the following, as appropriate:
  - Phone calls (automated or manual) targeted at specific audiences
  - Emails or direct mail targeted at specific audiences
- 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 programs
    - 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. Additional ME&O Activities and Tools by Class A Companies

- Additional channels for customer communication and targeted outreach that may be undertaken by Suburban, as resources allow, include:
    - Company web site
    - Social media
    - News releases to local media
    - Virtual community meeting
    - Direct contact at customer residence (i.e. door tags)
    - Materials in multiple languages (according to customer demographics)
    - Advertising (print, social media, or other)

E. Partnerships

- Suburban will seek to identify and partner with community-based and other organizations that regularly interact with targeted audiences, specifically the disadvantaged communities, to expand its 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.
- Additional potential avenues and partnerships include:
    - The California Special Districts Association (CSDA) and their local service providers to promote programs offered by local regulated water utilities.
    - An additional data exchange with energy investor-owned utilities in 2022, increasing the total to four data exchanges, in order to identify potential customers who could benefit from water utility assistance program.
    - Seeking partnerships with diverse suppliers to assist regulated water utilities in implementing customer ME&O activities and tools.

F. Incremental ME&O Costs

- Suburban estimates that it cannot both comply with this Resolution and maintain compliance with existing Decision mandates by leveraging only existing authorized budgets. Suburban anticipates incurring additional cost resulting from this transition plan which will consist of additional customer mailings not currently budgeted. Total projected cost is $134,000, which is based on three additional mailings x printing and mailing $.398/customer x 74,500 customers.

These mailing costs are of an exceptional nature not under Suburban's control, could not have been reasonably foreseen in Suburban's last general rate case, the costs will occur before Suburban's next scheduled rate case, the costs are substantial, and ratepayers will benefit from the information provided by these mailings.

IV. COMPLIANCE AND SAFETY

A. Alignment with Program Enrollment Targets and Requirements

Following is a summary from Suburban's Advice letter 338-W-A, approved by Water Division on October 16, 2019, implementing the ECPs. Suburban complied with each of the elements of Resolution M-4842 and Resolution M-4849 has now extended those ECPs through June 30, 2021. Following is a summary of those protections:

i. Provisions for Customers

- Work cooperatively with affected customers to resolve unpaid bills and minimize disconnections for non-payment;
- Waive reconnection or facilities fees for affected customers and suspend deposits for affected customers who must reconnect to the system;
- Provide reasonable payment options to affected customers;
- Waive bills for customers who lost their homes or if their homes are rendered uninhabitable; and,
- Authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.

  Additionally, in the event that Emergency Disaster Relief Customer Protections are triggered for a specific community, Suburban will execute reactive outreach to support customers and ensure they have information regarding the program.

ii. Tactical Action Plan

Suburban will notify customers of Emergency Disaster Relief Customer Protections in the following ways (posted and updated as necessary):

- Website - will add a new 'Emergency Disaster Relief Customer Protections' page for each customer service area on the website that is easy for customers to identify.
- Social Media - will post content highlighting the 'Emergency Disaster Relief Customer
- Protections' on the utility's Twitter and Facebook pages at least once per month.
- Customer Email/e-Newsletter- will disseminate at least one customer email per year via either a direct email or in the utility's e-Newsletter to educate regarding 'Emergency Disaster Relief Customer Protections'.

- Bill Insert/Mail - will issue at least one bill insert or direct mail postcard per year to all customers to educate regarding 'Emergency Disaster Relief Customer Protections'.
- News Release/Media Advisory - will issue a news release or media advisory to all media organizations that cover its service areas, upon launching the new 'Emergency Disaster Relief
- Community Outreach- will develop printed material that can be distributed when
- Suburban attends community events and made available at Suburban's customer service offices.
- Customer Ambassadors/Employees- will develop and issue detailed information regarding the 'Emergency Disaster Relief Customer Protections' program to employees, so they are equipped to answer any questions from customers.
- Outreach to Low-Income Customers -will include information regarding 'Emergency Disaster Relief Customer Protections' when Suburban issues communications to low income customers enrolled in the utility's Water Invoice and Statement Help (WISH) program.

The following tactics will be executed to a targeted group of customers who may have been impacted by a disaster event. These tactics will occur as soon as possible (factoring local conditions), following the declaration of a state of emergency:

  - Targeted Outreach (Impacted Customers)- Suburban will attempt to contact affected customers by mail or door notice when 'Emergency Disaster Relief Customer Protections' are triggered for a community to alert them of protections.
  - Local Governments - will alert local governments and elected officials via email or by phone regarding 'Emergency Disaster Relief Customer Protections' available to customers.
  - iOutbound Dialing - will place outbound 'Reverse 911' calls throughout any Suburban community affected by a disaster within 72 hours of the conclusion of an event to alert customers regarding 'Emergency Disaster Relief Customer Protections'.
  - Customer Service Center - Suburban's local staff will provide timely information about water quality, service interruptions and restoration efforts and relief support.
  - Specific communications will include status of water quality and service availability (as appropriate), relief provided to customers or available to customers, and updated information about restoring service during the rebuilding of structures destroyed or rendered uninhabitable by a proclaimed disaster.

All content intended for customer notice will be translated and disseminated in English, Spanish, Chinese, Tagalog, Vietnamese, and Korean. Please note, social media parameters may prohibit the sharing of information in multiple languages.

iii. Significant Customer Benefits of Disconnection Protections

We cannot over-emphasize the significant customer protections afforded by SB 998 and Resolution M-4849. The following table is enlightening, showing the number and percent of Suburban customers who would be otherwise facing disconnection after June 30, 2021 were it not for these transition procedures. An estimated 17% - 20% of Suburban's residential customers would be facing disconnection were it not for customer protections. The table clearly shows customer protections working as intended. However, resulting the total deferred customer arrearages will be large and customers' ability to pay those arrearages is uncertain. The table suggests that after customer protections are lifted, potentially large amounts of customer arrearages may be unrecoverable and will have to be deferred to the CEMA account for future amortization. It is imperative that the CEMA account remain open after 6/30/21 in order to capture these expected uncollectible arrearages.

Number of Residential Customers Projected To Be Facing Possible Disconnection				
	Before Customer Protections		After Customer Protections	
	Customers	Percent	Customers	Percent
Jul-21	12,021	17.0%	0	0
Aug-21	12,375	17.5%	0	0
Sep-21	12,728	18.0%	0	0
Oct-21	13,082	18.5%	0	0
Nov-21	13,435	19.0%	0	0
Dec-21	13,789	19.5%	0	0

iv. Benefits Of Other Customer Protections

We would add that there are additional customer protections in place outside of the ECPs mandated by Resolution M-4842. Executive Order N-42-20 implements a moratorium on residential and small business water service disconnections for non-payment. That moratorium and the other customer protections therein will continue to be in place even when the Commission's ECPs are lifted. Also, SB 998 mandates certain requirements and procedures with respect to disconnections even when the Commission's ECPs are lifted. Suburban's advice letter 338-W-A implemented the provisions of SB 998.

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

Suburban 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 Suburban employees, customers and the general public.

Suburban's main office and regional offices are currently closed in compliance with the State's safety protocols for the COVID-19 pandemic. While all other payment options (mail, phone, online, bank transfer, credit card, authorized payment locations) remain available, to ensure the safety of customers and employees and in compliance with state and local COVID-19 health orders, Suburban's offices will remain closed until they can be reopened safely.

Suburban has also suspended various non-essential field service activities. To ensure the safety of Suburban's customers and employees and in compliance with health and safety orders, Suburban will not resume those field activities until state and local COVID-19 health regulations and orders permit resumption.

V. PROGRESS TRACKING AND REPORTING

A. Background and Protocols for Progress Tracking and Reporting

- Suburban has been and will continue to provide monthly data reports regarding customers' arrearages as part of the water low-income rate assistance rulemaking proceeding R.17-06-024. Arrearage data reported includes 1) number of customers requesting bill assistance, 2) number of overall enrolled customers in Suburban's Customer Assistance Program (CAP), 3) number of customers late or behind on their bills, 4) average arrearage amounts, 5) median arrearage amounts, 6) range of arrearage amounts, and 7) overall arrearage amounts.

  Additionally, commencing July 1, 2021, Suburban will track and report the following metrics as part of the monthly data reports submitted in rulemaking proceeding R.17-06-024. Suburban will track and report such information on a monthly basis for 12 months following the end of the Commission-mandated ECPs (i.e., through June 30, 2022). To the extent feasible and available, Suburban will report each metric on a monthly basis, and, to the extent information is available retroactive, to February 2020.

  Furthermore, on a quarterly basis, Suburban will provide these tracking and reporting metrics to the Low-Income Oversight Board (LIOB).

  For the purpose of these metrics, enrollment in the respective CAP programs is assumed to be defined as customers being billed pursuant to the respective utility CAP tariffs.

B. Metrics to Track Continued Enrollment in CAP

- Number and percent of newly enrolled customers that are able to stay on the water utility CAP program post June 30, 2021.
- Number and percent of customers required to take actions to remain on Suburban's CAP programs (e.g., recertification, post enrollment verification) that successfully complete those actions.

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

- Number and percentage of customers enrolled in alternative payment arrangements (defined as enrollment in an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment).
- Number and percentage of customers that are disconnected.
- Number and percentage of CAP 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).
- Number of customers identified as eligible and interested in enrolling in alternative payment arrangements and percent of these successfully enrolled.

Tier Designation and Effective Date

This is a Tier 2 Advice Letter pursuant to General Order 96-B and Water Industry Rule 7.3.1(3) (Compliance with mandatory statute, decision, or resolution). Suburban requests that the Advice Letter is effective on June 1, 2021.

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 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 us, addressed to:
Suburban Water Systems, Robert L. Kelly, V.P. Regulatory Affairs, 1325 N. Grand Avenue, Suite 100, Covina, CA 91724, FAX (626) 331-4848, or e-mail bkelly@swwc.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 Division of Water and Audits 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 Suburban Water Systems at (626) 543-2500.

This filing will not cause the withdrawal of service, nor conflict with other schedules or rules. In compliance with Water Industry Rule 4.3 of General Order 96-B, a copy of this advice letter has been mailed or electronically transmitted to all interested and affected parties as detailed in Attachment A.

Sincerely,

/s/Robert L. Kelly

Robert L. Kelly
Vice President, Regulatory Affairs

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R.17-06-024

R.18-03-011

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