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September 9, 2019

ADVICE LETTER NO. 1258

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Purpose:

This advice letter filing is being made to comply with D.19-07-015 in the Emergency Disaster Relief Rulemaking, which requires California-American Water Company (“California American Water”) to file a Disaster Relief Communications Plan within 60 days of the decision.

Background:

On July 15, 2019, The California Public Utilities Commission (“Commission”) issued Decision No. 19-07-015. Submission of this plan is made per Ordering Paragraph 13 which states:

“13. All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B Water utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service.) shall file a Tier 1 Advice Letter 60 days from the effective date of this decision, setting forth the plan for customer outreach of these protections in English, Spanish, Chinese (including Cantonese, Mandarin, and other Chinese languages), Tagalog, and Vietnamese as well as Korean and Russian where those languages are prevalent within the utilities’ service territories.”

Rate Impact:

None.

Request:

California American Water is submitting a Disaster Relief communications plan as required. During the Sonoma County Tubbs Fire in 2017, California American Water provided similar protections that were communicated through multiple channels prior to a Commission order to do so. In the event of a widespread major disaster that impacts California American Water’s ability to comply with any aspect of the plan in a timely manner, we will communicate the failure and provide an estimated timeline on compliance with the plan to the Water Division.

Tier Designation:

D.19-07-015 requires a Tier 1 filing.

Effective Date:

Plan is effective upon filing.

Service List:

In accordance with Section 4.3 of General Order 96-B, a copy of this advice letter has been served upon all interested and affected parties as shown in Exhibit A.

Protests and Responses:

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

A **response** supports the filing and may contain information that proves useful to the Commission in evaluating the AL. A **protest** objects to the AL in whole or in part and must set forth the specific grounds on which it is based. These grounds¹ are:

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

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

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

The addresses for submitting a response or protest are:

Email Address:

Water.Division@cpuc.ca.gov

Mailing Address:

CA Public Utilities Commission
Division of Water and Audits
505 Van Ness Avenue
San Francisco, CA 94102

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:

Email Address:

Mailing Address:

¹ G.O. 96-B, General Rule 7.4.2

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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.

If you have not received a reply to your protest within 10 business days, contact this person at (916) 568-4222.

REPLIES²

The utility shall reply to each protest and may reply to any response. Any reply must be received by DWA within five business days after the end of the protest period, and shall be served on the same day on each person who filed the protest or response to the AL.

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

This filing will not cause the withdrawal of service, nor conflict with other schedules or rules.

If you have not received a reply to your protest within 10 business days, please contact me at (916) 568-4232.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Jeffrey T. Linam

Jeffrey T. Linam
Vice President of Rates & Regulatory

² G.O. 96-B, General Rule 7.4.3

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ADVICE LETTER 1258

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CALIFORNIA-AMERICAN WATER COMPANY
ADVICE LETTER 1258
SUPPORTING DOCUMENTATION FOR STAFF

**All Districts – Disaster Relief Communication Plan
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Disaster Relief Communications Plan

Updated September 9, 2019

Requirements

- Within 15 days of a state or federally declared disaster California American Water will issue a Tier 1 advice letter implementing emergency Customer Protections and activating its CEMA account.
- Customer Protections include:
 - Activation of CEMA to the time of the declaration of emergency
 - Work cooperatively with customers to resolve unpaid bills and minimize disconnections for non-payment
 - Waiver of deposit requirements for customers for 1 year
 - Waiver of connection or facility fees for affected customers
 - Waive bills for victims who lose their homes or whose homes are rendered uninhabitable
 - Offer a pro rata waiver of any fixed element of a bill for the time the home is uninhabitable
 - Other protections ordered by the Commission or judged appropriate by California American Water.
 - Make insurance claims on all costs and expenses related to the disaster and credit payments to the CEMA

Tactical Plan

Customer protections shall be communicated before, during and after a disaster.

- **Before a disaster** establishment of the customer protections will be communicated initially by January 1, 2020 and periodically thereafter
- Periodic bill insert/insert or letter to all customers (annually)
- Continuous communication on California American Water's website
- Printed information continuously available at California American Water's payment centers
- Widely distributed press release announcing establishment of program
- Periodic information about the protections sent via electronic newsletter to government officials, non-profits and other key stakeholders
- Periodic social media posts regarding the establishment and availability of protections in the event of a disaster



- Periodic internal communications about the establishment and availability of protections on California American Water's intranet and internal education tools including customer care information
- Printed information available at community disaster preparedness events
- **During and after a proclaimed disaster** California American Water shall communicate protections to customers via:
 - Letter or bill insert/onsert
 - Email for those customers whom California American Water has email addresses
 - In a prominent location on the company website
 - Widely distributed press release
 - Social media posts
 - CodeRED system (autodialer, SMS Text and Email)
 - Community outreach including public meetings, coordination with government agencies responsible for disaster relief and non-governmental agencies assisting with relief
 - Customer service centers and local staff to provide timely information about water quality, service interruptions and restoration efforts and relief support
 - Other means as directed by the Commission or upon the judgement of California American Water
- Communications during and after a proclaimed disaster 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
- Language outreach before, during and after a proclaimed disaster shall include English and Spanish as well as Chinese, Tagalog, Vietnamese, Russian, and Korean as well as Hmong or other languages as appropriate for service area.
- Outreach should include accessible formats to accommodate customers with disabilities.