



110 W. Taylor Street
San Jose, CA 95110-2131

September 9, 2019

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Advice Letter No. 536

San Jose Water Company (U-168-W) (SJWC) hereby submits its emergency disaster relief customer outreach plan as required by the California Public Utilities Commission (Commission) in Decision (D.) 19-07-015, adopted on July 11, 2019. This advice letter is designated a Tier I Advice Letter consistent with General Order 96-B, 7.3.1(3) and Ordering Paragraph No. 13 of D.19-07-015. Water Industry Rule 3.2 of General Order 96-B indicates that this kind of Tier 1 filing does not require customer notice.

Ordering Paragraph No.13 of D.19-07-015 states as follows.

“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.”

Background

The Commission adopted D.19-07-015 on July 11, 2019. The decision implements an emergency disaster relief program for electric, natural gas, water, and sewer utility customers under the Commission’s jurisdiction. The emergency disaster relief program is designed to ensure that utility customers who experience a housing or financial crisis due to a disaster, keep vital utility services in the wake of a disaster.

According to D. 19-07-015, experience shows that some customers have relatively less access to information regarding emergency preparedness. In order for customers to have equal access to the protections provided in the decision, it is important to ensure that all utility customers are aware of the emergency customer protections before a disaster occurs. Therefore, the decision establishes a baseline of required outreach and education activities to ensure each utility’s plan is robust to reach affected customers.

Submission of SJWC's emergency disaster relief customer outreach plan (Attachment A) is made in compliance with the above ordering paragraph.

Effective Date

This advice letter is designated as Tier I with an effective date of September 9, 2019.

Protests and Responses

Anyone may respond to or protest this advice letter. A response does not oppose the filing but presents information that may prove 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 may include the following:

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

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

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

Regulatory Affairs
San Jose Water Company
110 West Taylor Street
San Jose, CA 95110
Fax 408.279.7934
regulatoryaffairs@sjwater.com.

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.

SJWC has ALs 532 and 534, both suspended, and AL 535 pending before the Commission.

In compliance with Paragraph 4.3 of General Order 96-B, a copy of this advice letter has been mailed to all interested and affected parties as detailed in Attachment B.

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

Very truly yours,

/S/

JOHN TANG
Vice President of Regulatory Affairs

Enclosures

SAN JOSE WATER COMPANY

ADVICE LETTER NO. 536

ATTACHMENT A

EMERGENCY DISASTER RELIEF CUSTOMER OUTREACH PLAN

Initial Actions

- San Jose Water will alert all customers of emergency protections available to them that will be implemented in the event that the Governor of California or President of the United States declares a state of emergency (other than a drought) because a disaster has either resulted in the loss or disruption of the delivery or receipt of water utility service and/or resulted in the degradation of the quality of water utility service.
- Within 15 days of a state or federally declared disaster San Jose Water will issue a Tier 1 advice letter implementing emergency customer protections and activating its Catastrophic Event Memorandum Account (CEMA). Make insurance claims on all costs and expenses related to the disaster and credit payments to the CEMA.

Objectives

- To demonstrate San Jose Water's commitment to our customers who are facing loss of homes, businesses and/or property following natural disasters
- To fulfill the provisions of the recent decision by the California Public Utilities Commission to inform customers on an ongoing basis (at least twice per year) about options San Jose Water has available to support and protect them. For wildfires, in particular, ensure that customer outreach about available customer protections occurs before, during, and after a wildfire.

Provisions for Customers

- Waive bills for victims who lose their homes or whose homes are rendered uninhabitable
- Automatically close accounts for homes destroyed and waive final bill
- Provide additional bill credit for customers whose homes are not destroyed but are either damaged or uninhabitable for a time, and/or prorate monthly service charge
- Provide bill credit for customers who had to evacuate, to account for time not able to be home, and/or prorate monthly service charge
- Waive any deposit requirements for residents and small businesses seeking to reestablish service for one year
- Expedite start/end service requests
- Suspend disconnection for non-payment and related fees (late fees, deposits)
- Suspend collection activities for non-payment
- Stop any estimated usage for billing attributed to time when home unoccupied due to event
- Offer extended payment plan options on a case-by-case basis
- 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 reconnection or facility fees for affected customers
- Other protections judged appropriate by the utility.

Tactical Plan

San Jose Water will notify customers of Disaster Relief Customer Protections before and after a disaster (posted and updated as needed). All content 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. Outreach should include accessible formats to accommodate customers with disabilities.

Before a disaster: Establishment of the customer protections will be communicated initially by January 1, 2020 and periodically thereafter.

- **Website** – will add a new ‘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 ‘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 newsletter.
- **Bill Insert/Mail** – will issue at least one bill insert or direct mail postcard per year to all customers to educate regarding ‘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 ‘Disaster Relief Customer Protections’ program. This news release will be issued during the period from Sept. 15-Dec. 31, 2019.
- **Community Outreach** – will develop printed material that can be distributed when San Jose Water attends community events and continuously made available at company payment centers or customer service offices.
 - 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 company intranet and internal education tools including customer care information
- **Customer Ambassadors/Employees** – will develop and issue detailed information regarding the ‘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 ‘Disaster Relief Customer Protections’ when San Jose Water issues communications to low-income customers enrolled in the utility’s Water Rate Assistance Program.

During and after a proclaimed disaster: shall communicate protections to customers via:

- **Targeted Outreach (Impacted Customers)** – San Jose Water will attempt to contact affected customers by mail or door notice when ‘Disaster Relief Customer Protections’ are triggered for a community to alert them regarding protections.

- Letter or bill insert
- Email for those customers for whom the utility has email addresses
- A prominent location on the company website
- Widely distributed press release
- Social media posts
- **Local Governments** – will alert local governments and elected officials via email or by phone regarding ‘Disaster Relief Customer Protections’ available to customers. Additional community outreach will include public meetings, coordination with government agencies responsible for disaster relief and non-governmental agencies assisting with relief.
- **Outbound Dialing** – will place outbound ‘Reverse 911’ calls (CodeRED system - autodialer, SMS Text and Email) throughout any San Jose Water community affected by a disaster within 72 hours of the conclusion of an event to alert customers regarding ‘Disaster Relief Customer Protections.’
- **Customer Service Centers** – San Jose Water 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.

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SAN JOSE WATER COMPANY

ADVICE LETTER NO. 536

ATTACHMENT B

SERVICE LIST

A copy of Advice Letter No. 536 has been sent to the following municipalities, water companies and interested parties:

City of San Jose
Municipal Water Dept.
Attn: Jeffrey Provenzano
3025 Tuers Road
San Jose, CA 95121

San Jose Mercury News
Attn: Paul Rogers
4 N. Second Street, Suite 800
San Jose, CA 95113

California Water Service Co.
Attn: Regulatory Affairs
1720 North First Street
San Jose, CA 95112

Town of Los Gatos
Attn: Director of Public Works
110 E. Main Street
Los Gatos, CA 95032

City of Cupertino
10300 Torre Avenue
Cupertino, CA 95014

City of Monte Sereno
Attn: Jessica Kahn, City Engineer
18041 Saratoga-Los Gatos Road
Monte Sereno, CA 95030

City of Campbell
70 North First Street
Campbell, CA 95008

City of Santa Clara
1500 Warburton Avenue
Santa Clara, CA 95050

Great Oaks Water Company
P.O. Box 23490
San Jose, CA 95153

City of Milpitas
Attn: Utilities Engineering
455 East Calaveras Blvd.
Milpitas, CA 95035

Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, CA 95118

City of Saratoga
Attn: Director of Public Works
13777 Fruitvale Avenue
Saratoga, CA 95070

County of Santa Clara
70 W. Hedding Street
San Jose, CA 95110

Department of Water Resources
Safe Drinking Water Office, Room 804
1416 9TH Street
Sacramento, CA 95814

Mountain Springs Mutual Water Co.
17956 Greenwood Road
Los Gatos, CA 95033

Nina Hawk
Chief Operating Officer
Water Utility Enterprises
Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, CA 95118

Stagecoach Mutual Water Co
21825 Stagecoach Road
Los Gatos, CA 95033

Gillette Mutual Water Company
21976 Gillette Drive
Los Gatos, CA 95033

Pat Kearns, MD
7 W Central Ave
Los Gatos, CA 95030

Redwood Estates Services Association
PO Box 591
Redwood Estates, CA 95044-0591

Saratoga City Council Member
Rishi Kumar
13777 Fruitvale Avenue
Saratoga, CA 95070

Big Redwood Park Water
& Improvement Assoc.
18522 Mt. View Avenue
Los Gatos, CA 95033

WRATES
Rita Benton
18555 Ravenwood Drive
Saratoga, CA 95070

Villa Del Monte Mutual Water Company
P.O. Box 862
Los Gatos, CA 95031

Saratoga Heights Mutual Water Company
P.O. Box 337
Saratoga, CA 95071

Ridge Mutual Water Company
22316 Citation Drive
Los Gatos, CA 95033

James Hunter
6475 Dwyer Street
San Jose, CA 95120

Summitt West Mutual Water Company
P.O. Box 974
Los Gatos, CA 95031

Raineri Mutual Water Company
P.O. Box 11
Los Gatos, CA 95031

Oakmount Mutual Water Company
P.O. Box 31536
Stockton, CA 95213

Mt. Summit Mutual Water Co
P.O. Box 3416
Saratoga, CA 95070

Brush & Old Well Mutual
Water Company
21105 Brush Road
Los Gatos, CA 95033