



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

March 19, 2020

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

Advice Letter No. 546

Dear Madame/Sir:

San Jose Water Company (U-168-W) (SJWC) hereby submits its compliance filing as required by the California Public Utilities Commission (Commission) in Executive Director Alice Stebbin's letter dated March 17, 2020 (Attachment A). This advice letter is designated a Tier I Advice Letter consistent with General Order 96-B, 7.3.1(3). Water Industry Rule 3.2 of General Order 96-B indicates that this Tier 1 filing does not require customer notice.

Purpose

With this advice letter, SJWC is notifying the Commission of the activation of its Catastrophic Event Memorandum Account and the actions taken to comply with Executive Director Stebbin's direction in her March 17, 2020 letter to extend the customer protections identified in our Disaster Relief Customer Protections and Outreach Plan. Since the Governor first declared the COVID-19 State of Emergency on March 4, 2020, SJWC has taken the following actions:

- Activated the Disaster Relief Customer Protections and Outreach Plan on March 6, 2020;
- Suspended shutoffs beginning on March 12, 2020 (no SJWC customers are currently shutoff);
- Notified the Commission and local governments of the above on March 12 and March 13, respectively;
- Posted information on our website beginning on March 12, 2020 and continuing to update the information as necessary;
- Issued a press release on March 16, 2020; and,
- Posted the information through our social media channels on March 18, 2020.

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.

On September 9, 2019, SJWC filed Advice Letter 536 with the Commission to submit its Disaster Relief Customer Protections and Outreach Plan (Plan). The Plan required certain outreach to customers prior to the declaration of a disaster including via a press release, website, bill insert, and social media. The outreach was completed in early March 2020 and communicated to the Water Division.

The Plan provides that:

“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.”

SJWC had initially activated its CEMA effective October 10, 2019, as approved in Advice Letter 540, to deal with the impacts from the Public Safety Power Shutoffs (PSPS). The CEMA remained open to deal with other PSPS and catastrophic events. As such, SJWC began tracking the costs and expenses to respond to the COVID-19 pandemic beginning on March 4, 2020.

Effective Date

This advice letter is designated as Tier I and effective March 4, 2020, in compliance with Executive Director Stebbin’s directive applying customer protections retroactively to this date.

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. Public notice is not required.

The present rates of the SJWC became effective on January 1, 2020, by Advice Letter No. 541. SJWC has Advice Letter 545 pending before the Commission.

In compliance with Paragraph 4.3 of GO 96-B, a copy of this advice letter has been sent to all interested and affected parties as detailed in Attachment B. Please note that due to the COVID-19 pandemic, advice letters can only be delivered electronically to the service list. Hardcopies will be sent out as soon as staff are able to return to the office.

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

Very truly yours,

/S/ JOHN TANG

JOHN TANG
Vice President of Regulatory Affairs

Attachments

Index of Workpapers

Attachment A **Executive Director Letter dated March 17, 2020**

Attachment B **Service List**

SAN JOSE WATER COMPANY

ADVICE LETTER NO. 546

ATTACHMENT A

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 17, 2020
VIA E-MAIL

Jeffrey T. Linam
Vice President, Rates & Regulatory
California-American Water Company
4701 Beloit Drive
Sacramento, CA 95838-2434

John Tang
Vice President, Regulatory Affairs
San Jose Water Company
110 West Taylor Street
San Jose, CA 95110-2131

Natalie Wales
Director, Regulatory Policy & Compliance
California Water Service Company
1720 North First Street
San Jose, CA 95112-4598

Robert L. Kelly
Vice President, Regulatory Affairs
Suburban Water Systems
1325 N. Grand Ave., Ste. 100
Covina, CA 91724-4044

Jon Pierotti
Regulatory Affairs Manager
Golden State Water Company
630 East Foothill Blvd
San Dimas, CA 91773

Thomas Adcock
President
Alisal Water Corporation
249 Williams Road
Salinas, CA 93905

Timothy Guster
General Counsel
Legal and Regulatory Affairs
Great Oaks Water Company
PO Box 23490
San Jose, CA 95153-3490

Tim Bakman
Bakman Water Company
PO Box 7965
Fresno, CA 93747

Edward N. Jackson
Director, Rates and Regulatory Affairs
Liberty Utilities, Park Water,
Apple Valley Ranchos Water
PO Box 7002
9750 Washburn Road
Downey, CA 90241

Robert Fortino
Del Oro Water Company
Drawer 5172
Chico, CA 95927

Joel M. Reiker
Vice President of Regulatory Affairs
San Gabriel Valley Water Company
11142 Garvey Avenue
El Monte, CA 91733-2498

Lawrence Morales
Vice President/General Manager
East Pasadena Water Company
3725 East Mountain View Avenue
Pasadena, CA 91107

SUBJECT: Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency

I write to you in response to Governor Gavin Newsom's proclamation of a state of emergency in California due to the spread of COVID-19. This letter serves as notification that the California Public Utilities Commission (CPUC) plans to take action to provide emergency customer protection measures for customers in California to prevent disconnections for unpaid bills during the pendency of the emergency. You should act on the customer protections measures described in this letter immediately; the CPUC will vote to ratify these measures in the near future.

On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19. On March 12, 2020, Governor Newsom issued a new Executive Order¹ recognizing that individuals exposed to COVID-19 may be unable to report to work due to illness or quarantines, and ordering numerous measures including social distancing. On March 16, 2020, Governor Newsom issued an Executive Order² requesting that the CPUC monitor the measures undertaken by public and private utility providers to implement customer service protections in response to COVID-19.

It is clear that the response to COVID-19 will be extremely disruptive to all Californians and will impact many Californians' ability to work. We have dealt with highly disruptive events in the recent past, with the devastating wildfires in Northern and Southern California. In response, the CPUC adopted a series of requirements for utility companies (electric, gas, water, sewer) and communications providers, culminating in customer protections measures adopted in two decisions (D.) 19-07-015 and D.19-08-025. These customer protection measures apply in cases where the declared emergency relates to the disruption of service or to the degradation of service.

¹ Executive Order N-25-20, available at <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.12.20-EO-N-25-20-COVID-19.pdf>

²² Executive Order N-28-20, available at <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf>

COVID-19 has not resulted in the same disruptions or degradations to utility service in California as the recent wildfires. We expect that utility services will remain reliable and assist in California's COVID-19 response by allowing more people to safely self-quarantine or telework. Despite the differences in the cause of the emergencies, the customer protections adopted in D.19-07-015 and D.19-08-025, which include moratoriums on disconnections, can mitigate some of the disruptions to Californians' daily lives related to the COVID-19 response – especially those Californians who are economically vulnerable. In response to COVID-19, some utilities and service providers have already announced voluntary moratoriums on service disconnections for non-payment.

Because of the seriousness of the situation, we expect the utilities and service providers subject to D.19-07-015 and D.19-08-025 to extend the same applicable customer protections directed in D.19-07-015 and D.19-08-025 to customers in response to the declared state of emergency due to the spread of COVID-19. We also expect the utilities and service providers to report to the CPUC on all customer protection measures they implement in response to COVID-19 as soon as they are implemented, so that the CPUC may publicly report on these measures. These customer protections should be retroactively applied to March 4, 2020.

Subject to CPUC action to ratify this direction, the utilities and service providers will be expected to file an advice letter reporting compliance with implementing the mandated customer protections.

Sincerely,



Alice Stebbins
Executive Director

CC: President Marybel Batjer, CPUC
Commissioner Martha Guzman Aceves, CPUC
Commissioner Liane Randolph, CPUC
Commissioner Clifford Rechtschaffen, CPUC
Commissioner Genevieve Shiroma, CPUC

Maryam Ebke, Deputy Executive Director, CPUC
Lucian Filler, Deputy Executive Director, CPUC
Edward Randolph, Deputy Executive Director, CPUC
Hazel Miranda, Office of Government Affairs Director, CPUC
Service List to R.18-03-011

SAN JOSE WATER COMPANY

ADVICE LETTER NO. 546

ATTACHMENT B

A copy of Advice Letter No. 546 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

Richard Rauschmeier
Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

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