

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 31, 2024

Jonathan Morse
Sr. Manager Rates & Regulatory
California-American Water Company
520 Capitol Mall Ste. 630
Sacramento, CA 95814

Dear Mr. Morse,

The Water Division of the California Public Utilities Commission has approved California-American Water Company's Advice Letter No. 1454, filed on November 22, 2024, regarding Emergency Protections – November Fires – Southern Division.

Enclosed is a copy of the advice letter with an effective date of November 7, 2024 for the utility's files.

Please contact Bradley Leong at BL4@cpuc.ca.gov, if you have any questions.

Thank you.

Enclosures

**CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS**

Advice Letter Cover Sheet

Utility Name: California American Water	Date Mailed to Service List: November 22, 2024
District: Southern Division	
CPUC Utility #: U210W	Protest Deadline (20th Day): December 12, 2024
Advice Letter #: 1454	Review Deadline (30th Day): December 22, 2024
Tier: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input checked="" type="checkbox"/> Compliance	Requested Effective Date: November 7, 2024
Authorization: D. 19-07-015	
Description: Emergency Protections – November Fires – Southern Division	Rate Impact: \$See AL See AL%

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.

Utility Contact: Chase Grady	Utility Contact: Jonathan Morse
Phone: 916-568-4241	Phone: 916-568-4237
Email: chase.grady@amwater.com	Email: Jonathan.morse@amwater.com

DWA Contact: Tariff Unit
Phone: (415) 703-1133
Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

DATE	STAFF	COMMENTS
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

[] APPROVED [] WITHDRAWN [] REJECTED

Signature: _____ **Comments:** _____
Date: _____



November 22, 2024

ADVICE LETTER NO. 1454

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

California-American Water Company (California American Water) (U210W) hereby submits for review this advice letter.

Subject: Implementation of Emergency Disaster Relief Program for November 2024 Mountain Fire for Residential Customer and Non-Residential Customer Protections Pursuant to Decision (D.) 19-07-015

Purpose:

Pursuant to California Public Utilities Commission (Commission) Decision ("D.") 19-07-015, California American Water hereby notifies the Commission of implementation of emergency customer protections to support residential customers and small businesses impacted by the November 2024 Mountain Fire in Ventura County.

Background:

In 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.

Conclusion of Law 25 of D.19-07-015 provides:

It is reasonable to require the water and sewer corporations, as identified in Conclusion of Law 2, to file a Tier 1 advice letter with the Commission's Water Division within 15 days of a governor's state of emergency proclamation and/or a presidential state of emergency demonstrating implementation of the following emergency customer protections: (1) activation of their CEMA effective to the time of the declaration of emergency; (2) make insurance claims on all costs and expenses incurred as a result of the fires, and credit insurance payments to their CEMA; (3) work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment; (4) waive reconnection or facilities fees for affected customers and suspend deposits for affected customers who must reconnect to the system; (5) provide reasonable payment options to affected customers; and (6) waive bills for victims who lost their homes or if their homes are rendered uninhabitable; and (6) 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, Ordering Paragraphs 9 and 10 of D.19-07-015 provide as follows:

9. In the event the Governor of California or the President of the United States declares a state of emergency because 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 service, all Class-A 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.

10. All Class-A Water utilities ... shall track the associated costs with the emergency customer protections in the respective Catastrophic Event Memorandum Accounts and extend their applicability of those memorandum accounts to costs for implementing customer protections for all disasters in which the Governor of California or the President of the United States has declared a state of emergency. Catastrophic Event Memorandum Accounts or Emergency Customer Protections Memorandum Account tariff language must specify that entries in the account will be segregated by qualifying event. Costs for emergency customer protection activities should be recovered across each utility's entire customer base and the water and sewer utilities stated above, shall make any necessary tariff changes in accordance with the advice letter procedures prescribed by General Order 96-B.

On November 6, Governor Newsom announced FEMA's approval of a Fire Management Assistance Grant to support state and local firefighting response to the Mountain Fire. On November 7, 2024, Governor Newsom issued a Proclamation of a State of Emergency for the Mountain Fire. The fire has burned at least 19,643 acres, forcing the evacuation of residents, destroying homes, and threatening critical infrastructure.¹

The evacuation orders may have resulted in a loss or disruption for the receipt of utility service for customers in the evacuation zones. California American Water also believes that some of our customers may have suffered property damage due to the fires. California American Water is not currently aware of any fire damage to its property or infrastructure.

Discussion:

Following issuance of the Governor's emergency proclamation and the announcement of evacuation notices, and in accordance with D.19-07-015, California American Water activated its Catastrophic Event Memorandum Account (CEMA) effective to November 7, 2024, the time of the evacuation order. Its CEMA will remain open to respond to further catastrophic events. Each event will be tracked separately in the CEMA. At this time, California American Water has not made any insurance claims.

¹ <https://www.gov.ca.gov/2024/11/07/governor-newsom-proclaims-state-of-emergency-in-ventura-county-due-to-mountain-fire-meets-with-first-responders/>

California American Water will extend customers in its Ventura County services areas impacted by the mandatory evacuations the following customer protections:

- Dunning locks through March 31, 2025
- Cease late payment fees through March 31, 2025
- Offer customer payment options for up to one year
- Work with customers to adjust extraordinary water use due to the storms

California American Water recognizes that some customer homes have been damaged because of the fires, and for those customers it will also:

- Waive reconnection or facilities fees for affected customers
- Suspend deposits for affected customers who must reconnect to the system,
- Waive bills for victims 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

California American Water is communicating these protections through letter, bill text message, press release, social media and on our website in English and Spanish, the languages commonly spoken in our service areas. We are also providing abbreviated information to customers in other languages commonly spoken in California. These customer protections will be announced through social media and a press release; bill text messages are appearing on customer bills in December and January. A mailing to all customers is expected to go out early December 2024.

California American Water will record costs associated with the protections described herein in the CEMA. As stated above, the costs recorded will be incurred beginning November 7, 2024, the date of the Governor's proclamation. California American Water will seek recovery of these costs in a General Rate Case or other appropriate ratemaking proceeding. When California American files for recovery of costs related to the CEMA or others costs that will be recovered separately, California American Water will allocate those costs across all customer classes and all Districts in California.

California American Water is unaware of any operations and maintenance expenses above and beyond normal work hours for Ventura staff because of the fires.

Effective Date:

California American Water requests an effective date of November 7, 2024.

Tier Designation:

California American Water is also requesting an expedited advice letter treatment pursuant to the Commissions GO 96-B, requesting a waiver or a shortened protest and reply period of five days. This advice letter is submitted with a Tier 1 designation pursuant to General Order No. 96-B and D.19-07-015.

Notice:

This is a Tier 1 advice letter that does not require customer notification, as provided in Water Industry Rule 7.3.1 of General Order 96-B. In accordance with General Order 96-B, General Rule 4.3 and 7.2 and Water Industry Rule 4.1, a copy of this advice letter will be transmitted electronically to interested parties having requested such notification. ***Please note that this advice letter will only be distributed electronically.***

RESPONSE OR PROTEST²

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 grounds³ 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 day the response or protest is submitted to DWA, the respondent or protestant shall send a copy of the protest to California American Water at:

Email Address:

Mailing Address:

² G.O. 96-B, General Rule 7.4.1

³ G.O. 96-B, General Rule 7.4.2

chase.grady@amwater.com	520 Capitol Mall, Suite 630 Sacramento, CA 95814
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Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform DWA, 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.

REPLIES⁴

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 Chase Grady at (916) 568-4241.

CALIFORNIA-AMERICAN WATER COMPANY

/s/ Chase Grady

Chase Grady
Rates & Regulatory Analyst

⁴ G.O. 96-B, General Rule 7.4.3

SOUTHERN DIVISION SERVICE LIST
CALIFORNIA-AMERICAN WATER COMPANY

BY MAIL:

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