



SAN JOSE WATER

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

September 2, 2020

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

Advice Letter No. 554

Dear Madame/Sir:

San Jose Water Company (U-168-W) (SJWC) hereby submits its compliance filing in response to the recent blackout and fire emergencies 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. 9 of D.19-07-015. Water Industry Rule 3.2 of General Order 96-B indicates that this Tier 1 filing does not require customer notice.

Ordering Paragraph No. 9 of D.19-07-015 states as follows:

“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.”

Discussion

In mid-August 2020, Governor Gavin Newsom signed two Emergency Proclamations relating to “extreme heat” and statewide wildfires in the State of California.¹ SJWC’s service area is currently impacted by two wildfires, the CZU Lightning Complex Fire on the west and the SCU Lightning Complex Fire on the east. A mandatory order requiring 55 of our customers to evacuate was put in place by California Department of Forestry and Fire Protection (Cal Fire) from August 20 through August 31 as a result of the SCU Lightning Complex Fire.

SJWC has participated in PG&E’s load shedding program as requested in response to the blackouts resulting from the extreme heat event. We employ an efficient and automated time-of-use pump operation and energy management strategy through the SCADA control system to minimize energy use during peak demand periods. During these peak periods, SJWC maximizes the use of available reservoir storage to meet customer water demands. The SCADA system

¹ <https://www.gov.ca.gov/wp-content/uploads/2020/08/8.18.20-Fire-State-of-Emergency-Proclamation.pdf>
<https://www.gov.ca.gov/wp-content/uploads/2020/08/8.16.20-Extreme-Heat-Event-proclamation-text.pdf>

then turns pumps back on as needed during off-peak periods to refill storage reservoirs. In the event that energy is needed during the outages, our fleet of stationary and portable generators will be deployed as needed to maintain water service.

In addition, SJWC performed various outreach activities related to these events, including urging customers to conserve water when rolling electricity blackouts and wildfires threatened.

In compliance with Ordering Paragraph 9 and the company's Disaster Relief Plan, SJWC is:

1. Tracking the incremental response costs for each event through its Catastrophic Event Memo Account (CEMA);
2. Making insurance claims where applicable and credit insurance payments to the CEMA;
3. Working cooperatively with affected customers to resolve unpaid bills and minimize disconnections for non-payment (currently no customers are without service for non-payment);
4. Waiving reconnection or facilities fees for affected customers and suspend deposits for affected customers who must reconnect to the system;
5. Providing bill credit for those customers under the mandatory evacuation order (to account for time away from home) and/or prorate your monthly service charge.
6. Waiving any deposit requirements for residents and small businesses seeking to reestablish service for one year.
7. Expediting start/end service requests.
8. Suspending disconnection for non-payment and related fees (deposits).
9. Suspending collection activities for non-payment.
10. Stopping any estimated usage for billing attributed to time when your home was unoccupied due to an event.
11. Waiving deposit requirements for customers for one year.

Effective Date

There is no effective date for this compliance filing.

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 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
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 electronic mail to us, addressed to:

Regulatory Affairs
San Jose Water Company
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 552 and 553 pending before the Commission.

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

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

Attachment

SAN JOSE WATER COMPANY

ADVICE LETTER NO. 554

ATTACHMENT A

A copy of Advice Letter No. 554 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

Mukunda Dawadi
Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Garth Hall
Deputy 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