

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 30, 2020

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

Dear Mr. Tang,

The Commission has approved San Jose Water Company's Advice Letter No. 554, filed on September 2, 2020, regarding Statewide Wildfires and Extreme Heat Disaster Relief Compliance Filing.

Enclosed is a copy of the advice letter with an effective date of August 16, 2020 for the utility's files.

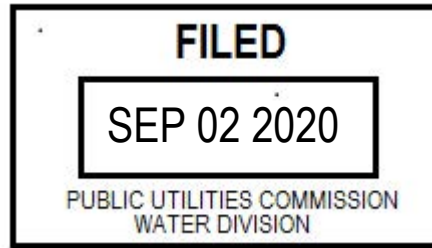
Please contact Eustace Ednacot at ERE@cpuc.ca.gov or 415-703-1492, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant
Water Division

Enclosures



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,

A handwritten signature in blue ink, appearing to read 'John Tang', with a large, stylized flourish at the end.

JOHN TANG
Vice President of Regulatory Affairs

Attachment