



GREAT OAKS WATER COMPANY

P.O. Box 23490
San Jose, CA
95153
(408) 227-9540
tguster@greatoaks
water.com

February 16, 2021

California Public Utilities Commission
Water Division
Room 3102
505 Van Ness Avenue
San Francisco, CA 94102-3298

Great Oaks Water Company (U-162-W) Advice Letter 295-W Demonstrating Compliance with Resolution M-4849

Great Oaks Water Company (Great Oaks) submits this Tier 1 Advice Letter in compliance with Resolution (Res.) M-4849, which was adopted by the California Public Utilities Commission (Commission) at its February 11, 2021 voting meeting and issued the next day. In particular, this Advice Letter complies with Res. M-4849's directive to Class A water utilities to demonstrate compliance with Res. M-4849's extension of Emergency Customer Protections to June 30, 2021.

Extension of Emergency Customer Protections

In the following sections, Great Oaks provides evidence of how it has extended the seven (7) categories of Emergency Customer Protections listed on page 7 of Res. M-4849.

(1) Activation of Catastrophic Event Memorandum Account (CEMA) effective to the date of the Governor's declaration of a state of emergency – March 4, 2020.

On March 19, 2020, Great Oaks notified then-Commission Executive Director Alice Stebbins, in writing, that Great Oaks had activated its CEMA, with an effective date of March 4, 2020. Great Oaks' CEMA remains active.

(2) Make insurance claims on all costs and expenses incurred as a result of the pandemic, and credit insurance payments to their CEMA.

Great Oaks has made specific requests of its insurance agent and broker for coverage of any losses resulting from the COVID-19 pandemic and state of emergency. Those requests have been denied. Great Oaks does not have insurance coverage for any such losses.

(3) Work cooperatively with affected customers to resolve unpaid bills and minimize disconnections for nonpayment.

Throughout the COVID-19 pandemic emergency, Great Oaks has worked cooperatively with its customers to resolve unpaid bills. In particular, Great Oaks has communicated the Emergency Customer Protections to its customers via its website and bill inserts. In addition, Great Oaks has sent additional notices to customers by mail who are more than 90 days past due and who have a balance due of \$50 or more. Such notices invite those customers to contact Great Oaks customer service to arrange for full or partial payments or to make arrangements for payment plans that are tailored directly to the customer needs. Such notices have reminded customers that Governor Newsom's Executive Order N-42-20 states unequivocally that unpaid water bills during the pandemic emergency will be due when the emergency is over and that water utilities, such as Great Oaks, will be entitled to collect such unpaid amounts.

With respect to disconnections for nonpayment, at the time the Governor declared a state of emergency, there were no Great Oaks customers whose service had been disconnected for nonpayment. There have been no disconnections for nonpayment during the COVID-19 pandemic emergency. All customers have received and continue to receive uninterrupted water service during the state of emergency whether they have paid for the water service they have consumed and purchased from Great Oaks or not.

(4) Waive reconnection or facilities fees for customers and suspend deposits for customers who must reconnect to the system.

Great Oaks confirms that it has not and will not charge customers reconnection or facilities fees and has suspended deposits for customers who must reconnect to Great Oaks' water system during the COVID-19 pandemic emergency.

(5) Provide reasonable payment options to customers.

Great Oaks confirms that it has and does provide reasonable payment options to customers, including payment plans. The terms and conditions of such payment options/plans are being tailored to individual customer needs, which Great Oaks believes is both a reasonable and flexible method of offering such payment options. Great Oaks confirms that it will continue to provide reasonable payment options to its customers throughout the pandemic emergency.

(6) Waive bills for victims who lost their homes or if their homes are rendered uninhabitable.

(7) 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.

Commission Res. M-4842 instructed Great Oaks and other water corporations to confirm compliance with the Emergency Customer Protections of Decision (D.) 19-07-15, which specifically included compliance items 6 and 7, above. In compliance with Res. M-4842, Great Oaks filed Advice Letter 288-W on April 29, 2020, which confirmed Great Oaks' compliance with Emergency Customer Protections 6 and 7, above. On June 9, 2020, the Commission's Water Division approved of Great Oaks Advice Letter 288-W. Great Oaks confirms that it will continue to maintain compliance with these Emergency Customer Protections throughout the pandemic emergency.

Finally, Great Oaks confirms that it shall continue to provide the customer protection measures for residential and small business customers adopted in D.19-07-015 and D.19-08-025 (as applicable), as ordered by Res. M-4842, through June 30, 2021, as required by Ordering Paragraph 1 of Res. M-4849. Great Oaks will also continue its ongoing community (customer) awareness and outreach activities, as required under D.19-07-015 and D.19-08-025 (as applicable), as ordered in Res. M-4842, as required by Ordering Paragraph 4 of Res. M-4849.

If further or different information is required of Great Oaks in order to comply with Res. M-4849, Great Oaks respectfully requests that it be provided with guidance so that such information may be provided.

No Effect on Water Service

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

Tier Designation

This is a Tier 1 Advice Letter pursuant to General Order 96-B and Water Industry Rule 7.3.1(3) (Compliance with mandatory statute, decision, or resolution).

Notice and Service

This Advice Letter is being served on Great Oaks' Advice Letter service list, as well as the service lists for R.17-06-024 and R.18-03-011.

Protests and Responses

Anyone may protest and respond to this Advice Letter. A Response supports the filing and may contain information that proves 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 specific grounds on which it is based. These grounds may be based upon the following:

(1) The utility did not properly serve or give notice of the Advice Letter;
or

(2) The relief requested in the Advice Letter would violate a statute or Commission order, or is not authorized by statute or Commission order on which the utility relies; or

(3) The analysis, calculations, or data in the Advice Letter contain material error or omissions; or

(4) The relief requested in the Advice Letter is pending before the Commission in a formal proceeding; or

(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 re-litigating a prior order of the Commission).

Any Protest or Response must be made in writing or by electronic mail and must be received by the Water Division of the Commission within 20 days of the date this Advice Letter is filed. The Advice Letter process does not

provide for any Protests, Responses or other comments, except for a reply by Great Oaks, after the 20-day comment period expires. The address for mailing or delivering a Protest or Response 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 any Protest or Response is submitted to the Water Division, the protesting or responding person, entity or party must serve a copy of the Protest or Response on Great Oaks addressed to Timothy S. Guster, Great Oaks Water Co., PO Box 23490, San Jose, CA 95153, 408-227-9540, 408 227-7126 (fax), email: tguster@greatoakswater.com.

Great Oaks Water Company

/s/

Timothy S. Guster

Vice President and General Counsel

Verification

I, Timothy S. Guster, am Vice President and General Counsel of Great Oaks Water Company. I have read the contents of Advice Letter 295-W and know the contents thereof. I certify that the facts provided in Advice Letter 295-W are true of my own knowledge, except to matters stated therein to be true upon information and belief, and to those matters, I believe them to be true.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed at San Jose, CA on February 16, 2021.

/s/

Timothy S. Guster

Great Oaks Water Co.
Distribution List

Municipal Water System
City of San Jose
3025 Tuers Road
San Jose, CA 95121

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

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

Office of Regulatory Affairs*
California Water Service Company
1720 North First Street
San Jose, CA 95112

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

Division of Water and Audits
California Public Utilities
Commission
505 Van Ness Avenue
San Francisco, CA 94102

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

Regulatory Affairs*
San Jose Water Company
110 West Taylor Street
San Jose, CA 95110

Legal Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3214

Syreeta Gibbs*
Public Advocates Office
505 Van Ness Avenue
San Francisco, CA 94102