



GREAT OAKS WATER COMPANY

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March 4, 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 29-W Demonstrating Compliance with Decision 19-07-015

Great Oaks Water Company (Great Oaks) submits this Tier 1 Advice Letter in compliance with Decision (D.) 19-07-015 issued by the California Public Utilities Commission (Commission) on July 19, 2019. This Advice Letter complies with Ordering Paragraphs 11 and 12 of D.19-7-015.¹

I. Compliance with Ordering Paragraph 11 of D.19-07-015

Ordering Paragraph 11 of D.19-07-015 provides:

All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa

¹ D.19-07-015, at pp. 67 – 68.

Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service.), shall file a Tier 1 Advice Letter at the default, 12-month conclusion of customer protection period (running from the date that customer protections related to the specific disaster became effective), or as reasonably determined by the Governor’s Office of Emergency Services, detailing the mandated protections offered to the customer affected by the disaster, the start and end periods customers received the emergency customer protections, the outreach efforts conducted, the customer impacts, and the associated cost.

A. Mandated Protections Offered to Great Oaks’ Customers.

On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19. March 4, 2021 is the 12-month anniversary of the declared State of Emergency.

On March 17, 2020, the Commission’s Executive Director issued a letter to all Class A and B water utilities indicating that the Commission expected “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.” The same letter also stated:

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.

On March 20, 2020, Great Oaks filed Advice Letter 285-W Regarding Compliance with D.19-07-015 and the Executive Director’s March 17, 2020 letter. In Advice Letter 285-W, Great Oaks confirmed that it had implemented its Emergency Disaster Relief Protections previously submitted with its Advice Letter 276-W-B and that such protections would be retroactively applied to March 4, 2020, consistent with the Executive Director’s March 17, 2020 letter. A copy of Great Oaks’ Emergency Customer Protections submitted with Advice Letter 276-W-B is attached hereto as Exhibit A. The Commission’s Water Division issued a letter to Great Oaks on April 6, 2020, indicating Commission approval of Advice Letter 285-W.

In Advice Letter 285-W, Great Oaks also detailed other actions it is taking in response to the declared State of Emergency, including:

1. Activation of its Catastrophic Event Memorandum Account (CEMA);
2. Customer Service representatives would work with customers who contact Great Oaks and advise that, due to COVID-19, they are having difficulty paying their bills;
3. Full compliance with the Water Shutoff Protection Act, which provides customers with additional notice prior to service disconnections due to nonpayment, as well as payment options should customers be unable to pay their bills on time;
4. Confirmed to the Commission that no customers have been disconnected for nonpayment;
5. Closure of its Walk-In Customer Service Center for the safety and health of its employees and customers; and
6. Other day-to-day measures taken to protect the health and safety of Great Oaks' employees.

On April 2, 2020, Governor Newsom issued Executive Order N-42-20 instituting a “shutoff moratorium” – a prohibition against discontinuing service for nonpayment – during the COVID-19 State of Emergency. Great Oaks has fully complied with this Executive Order and no Great Oaks customer has had water service disconnected for nonpayment during the State of Emergency.

The Commission issued Resolution (Res.) M-4842 on April 17, 2020, which directed utilities to implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic. In response thereto, Great Oaks filed Advice Letter 288-W on April 29, 2020 showing compliance with Res. M-4842. In Advice Letter 288-W, Great Oaks confirmed that it had already acted upon the first five of the seven Emergency Customer Protections for Water Customers listed actions in Res. M-4842.² Great Oaks also addressed the final two Emergency Customer Protections for Water Customers in Advice Letter 288-W. On June 9, 2020, the Commission’s Water Division sent a letter to Great Oaks indicating that the Commission had approved Advice Letter 288-W.

On February 12, 2021, the Commission issued Res. M-4849, which authorized and directed utilities to extend Emergency Customer Protections to support California customers through June 30, 2021, and to file Transition Plans for the expiration of Emergency Customer Protections.

Res. M-4849 required investor-owned Class A and B water utilities to file a Tier 1 Advice Letter within 10 days of the issuance of Res. M-4849 demonstrating compliance with the Extension of Emergency Customer Protections to June 30, 2021. On February 16, 2021, Great Oaks filed Advice

² Res. M-4842, at p. 7.

Letter 295-W confirming its extension of seven listed Emergency Customer Protections in Res. M-4849³ to June 30, 2021.

Res. M-4849 also required the Class A and B water utilities to submit draft Transition Plan Advice Letters to CPUC staff by February 25, 2021, containing draft Transition Plans containing the following elements:

1. Activities Timeline
2. Marketing, Education, and Outreach Strategy
3. Compliance and Safety
4. Progress Tracking and Reporting

On February 25, 2021, Great Oaks submitted its Draft Transition Plan Advice Letter as directed. Great Oaks' Draft Transition Plan included information about each of the four elements listed above.

B. Start and End Date of Emergency Customer Protections.

All Emergency Customer Protections described above began on March 4, 2020, and all will remain in place for Great Oaks' customers through at least June 30, 2021.

C. Outreach Efforts, Customer Impacts, and Associated Costs.

Throughout the declared State of Emergency, Great Oaks has provided information to customers through its website, periodic mailings, and its Customer Service representatives. Included in these outreach efforts has been information about bill payment options and encouragement to customers to address past-due bills in full or in part during the pandemic emergency period so that customers are not faced with large past-due balances at the end of the emergency period.

Great Oaks began voluntary reporting to the Commission's Water Division well before the Commission ordered, first, bi-weekly reporting of pandemic financial impacts, and then monthly reporting of pandemic financial impacts. The financial impacts reported by Great Oaks consisted of a summary of customer past-due balances in 30-day aging categories (0 – 30 days, 30 – 60 days, 60 – 90 days, 90 – 120 days, and over 120 days). Under current Commission-authorized tariffs, a bill becomes past due if not paid within 19 days after mailing. Under Commission-authorized tariffs, residential customers may not have service disconnected for nonpayment until at least 79 days after a bill is mailed. During the pandemic emergency period, there have been no service disconnections for nonpayment. The financial impacts

³ Res. M-4849, at p. 7.

consist of customers with past-due balances and Great Oaks having not received those customer payments. Great Oaks has also reported on customers enrolled in its Customer Assistance Program (CAP), both in terms of the number of enrollees and the past-due balances of those enrolled in the Great Oaks CAP.

The volume of reports submitted by Great Oaks is substantial, so only a brief summary is provided below. If additional information is needed or required for purposes of compliance with Ordering Paragraph 11 of D.19-07-015, Great Oaks requests to be advised so that the information may be provided.

At the end of August 2020, Great Oaks' customers had a total of \$63,514.16 in unpaid bills of 90 days or more past due. At the end of October 2020, that total had increased to \$84,088.59. By the end of calendar year 2020, the total had increased further to \$116,538.65. And at the end of January 2021, the total of unpaid bills of 90 days or more past due was up to \$140,045.28, consisting of 1,172 total bills, of which 381 were for CAP enrollees. All of Great Oaks' reports have been filed in Rulemaking (R.) 17-06-024.

Costs associated with Great Oaks' outreach efforts have been kept low by using traditional means. Great Oaks does not have either a marketing or outreach budget for outreach efforts and has incurred approximately \$3,000 in outreach expenses (representing approximately 3,000 mailings to date).

II. Compliance with Ordering Paragraph 12 of D.19-07-015.

Ordering Paragraph 12 of D.19-07-015 provides:

All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B Water utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service.) shall file a Tier 1 Advice Letter twelve months from a qualifying event, documenting the collaborative engagement they had with the Governor's Office of Emergency Services and the California Department of Forestry and Fire Protection demonstrating information sharing that aided these entities in carrying out their mission.

A. Collaboration and Information Sharing.

While the Emergency Customer Protections adopted in D.19-07-015 were primarily geared towards wildfire disasters, Great Oaks interprets the language of Ordering Paragraph 12, in the context of the COVID-19 State of Emergency, to require reporting on Great Oaks' collaboration with State and local emergency services and the information-sharing that has taken place during the pandemic State of Emergency.

From the beginning of the declared State of Emergency, Great Oaks has participated in meetings organized by the Santa Clara Valley Water District (Valley Water) for the purpose of discussing and addressing water utility-related aspects of the pandemic. Those meeting, first held weekly, and now monthly, included all public water systems in Santa Clara County, both local government water systems and Commission-regulated investor-owned water utilities. The meetings have covered various topics and were a collaborative effort to provide information and assistance when and where necessary. The meetings are ongoing.

Great Oaks has also been involved with emergency management meetings covering much the same topics. Those meetings, too, are ongoing.

Through the California Water Association (CWA), Great Oaks has been kept informed of State government activities pertaining to the COVID-19 State of Emergency as well. The CWA meetings on such topics also are continuing.

Great Oaks has stayed abreast and informed of Santa Clara County Public Health Department requirements and notices. Great Oaks is in compliance with all Santa Clara County Public Health Department requirements pertaining to workplace and worker safety, including required postings of workplace safety rules and social distancing protocols. No Great Oaks employees or customers have contracted the virus at the Great Oaks' office and workplace locations.

III. Compliance with D.19-07-015.

Great Oaks respectfully submits this Tier 1 Advice Letter in compliance with Ordering Paragraphs 11 and 12 of D.19-07-015. 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.

IV. No Effect on Water Service

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

V. 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).

VI. 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.

VII. 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 296-W and know the contents thereof. I certify that the facts provided in Advice Letter 296-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 March 4, 2021.

/s/

Timothy S. Guster

Great Oaks Water Company
Advice Letter 296-W

Exhibit A
Emergency Customer Protections



GREAT OAKS WATER COMPANY

EMERGENCY DISASTER RELIEF CUSTOMER PROTECTIONS

Great Oaks Water Company's Emergency Disaster Relief Program can provide protections for customers impacted by wildfires or other natural disasters, including COVID-19 (Coronavirus). In the event a State of Emergency is declared at the state or federal level, customers meeting the following criteria may be eligible for certain customer protections:

**Disaster-related loss or disruption of the delivery or receipt of water service,
and/or the degradation of the quality of utility service.**

If either of these criteria are met, Great Oaks Water Company shall:

1. Work cooperatively with affected customers to resolve unpaid bills and minimize disconnections for non-payment.
2. Waive reconnection or facilities fees for affected customers and suspend deposits for affected customers who must reconnect to the system.
3. Provide reasonable payment options to affected customers.
4. Waive bills for customers who lost their homes or had their homes rendered uninhabitable.
5. 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 the loss of water service.

The Emergency Disaster Relief Program complies with California Public Utilities Commission Resolution M-4833 and Commission Decision 19-07-015, which makes the protections listed above permanent for customers served by California regulated water service providers.

To learn more about Great Oaks Water Company's Emergency Disaster Relief Program, please contact Customer Service at (408) 227-9540.

ALIVIO DE DESASTRES DE EMERGENCIA PROTECCION DEL CLIENTE

El Programa de socorro en casos de desastre de emergencia de Great Oaks Water Company puede brindar protección a los clientes afectados por incendios forestales u otros desastres naturales, incluido COVID-19 (Coronavirus). En caso de que se declare un estado de emergencia a nivel estatal o federal, los clientes que cumplan con los siguientes criterios pueden ser elegibles para ciertas protecciones del cliente:

**Pérdida relacionada con el desastre o interrupción de la entrega o recepción del servicio de agua,
y / o la degradación de la calidad del servicio público.**

1. Trabajar cooperativamente con los clientes afectados para resolver las facturas impagas y minimizar las desconexiones por falta de pago.
2. Renunciar a las tarifas de reconexión o instalaciones para los clientes afectados y suspender los depósitos para los clientes afectados que deben volver a conectarse al sistema.
3. Proporcione opciones de pago razonables a los clientes afectados.
4. Renunciar a las facturas para los clientes que perdieron sus hogares o hicieron que sus hogares se volvieran inhabitables.
5. Autorice una exención prorrateada de cualquier elemento fijo de una factura de agua por el tiempo que la casa esté inhabitable, incluso si la razón por la que está inhabitable no es la pérdida del servicio de agua.

El Programa de ayuda en caso de desastres de emergencia cumple con la Resolución de la Comisión de Servicios Públicos de California M-4833 y la Decisión de la Comisión 19-07-015, que hace que las protecciones mencionadas anteriormente sean permanentes para los clientes atendidos por los proveedores de servicios de agua regulados de California.

Para obtener más información sobre el Programa de ayuda en caso de desastres de emergencia de Great Oaks Water Company, comuníquese con Servicio al cliente al (408) 227-9540.

紧急救灾客户保护

大橡树自来水管公司的紧急救灾计划可以为受野火或其他自然灾害（包括COVID-19（冠状病毒））影响的客户提供保护。如果在州或联邦一级宣布进入紧急状态，则满足以下条件的客户可能有资格获得某些客户保护：

与灾难有关的损失或供水服务的接收或中断，和/或公用事业服务质量下降。

如果满足这些条件之一，Great Oaks Water Company应：

1. 与受影响的客户合作解决未付账单并最大程度地减少因未付款而造成的断连。
2. 免除受影响客户的重新连接或设施费用，并暂停必须重新连接到系统的受影响客户的存款。
3. 为受影响的客户提供合理的付款方式。
4. 为失去房屋或房屋变得无法居住的客户免收账单。
5. 授权在房屋无人居住期间按比例放弃水费的任何固定部分，即使房屋无人居住的原因不是失去供水服务。

紧急救灾计划符合加利福尼亚公用事业委员会M-4833号决议和委员会第19-07-015号决定，该决定使上述列出的保护永久适用于由加利福尼亚监管的水服务提供商提供服务的客户。

要了解有关大橡树自来水管公司紧急救灾计划的更多信息，请致电（408）227-9540与客户服务联系。

EMERGENCY DISASTER RELIEF CUSTOMER PROTECTIONS

Ang Great Oaks Water Company's Emergency Disaster Relief Program ay maaaring magbigay ng mga proteksyon para sa mga customer na naapektuhan ng mga wildfires o iba pang natural na sakuna, kabilang ang COVID-19 (Coronavirus). Kung sakaling ang isang Estado ng Pang-emergency ay idineklara sa antas ng estado o pederal, ang mga customer na nakakatugon sa mga sumusunod na pamantayan ay maaaring maging karapat-dapat para sa ilang mga proteksyon ng customer:

Ang pagkawala ng kaugnay na pinsala o pagkagambala ng paghahatid o pagtanggap ng serbisyo sa tubig, at / o ang pagkasira ng kalidad ng serbisyo ng utility.

Kung ang alinman sa mga pamantayang ito ay natutugunan, ang Great Oaks Water Company ay dapat:

1. Makipagtulungan sa mga apektadong customer upang malutas ang mga hindi bayad na mga panukalang batas at mabawasan ang mga pagkakakonekta para sa hindi pagbabayad.
2. Ang muling pag-ugnay sa Waive o mga bayarin sa pasilidad para sa mga apektadong customer at suspindihin ang mga deposito para sa mga apektadong customer na dapat kumonekta muli sa system.
3. Magbigay ng makatuwirang mga pagpipilian sa pagbabayad sa mga apektadong customer.
4. Ang mga bill ng Waive para sa mga kustomer na nawalan ng kanilang mga tahanan o nagkaroon ng kanilang mga tahanan na hindi nabigyan ng tirahan.
5. Pahintulutan ang isang pro-average na pag-alis ng anumang nakapirming elemento ng isang panukalang batas ng tubig para sa oras na ang bahay ay hindi nakatira, kahit na ang dahilan kung bakit ito ay hindi nakatira ay hindi pagkawala ng serbisyo ng tubig.

Ang Emergency Disaster Relief Program ay sumusunod sa California Public Utility Commission Resolution M-4833 at Desisyon ng Komisyon 19-07-015, na gumagawa ng mga proteksyon na nakalista sa itaas nang permanente para sa mga customer na pinaglingkuran ng mga regulated ng serbisyo ng tubig ng California.

Upang malaman ang higit pa tungkol sa Emergency Disaster Relief Program ng Great Oaks Water Company, mangyaring makipag-ugnay sa Customer Service sa (408) 227-9540.

BẢO VỆ KHẨN CẤP KHẨN CẤP BẢO VỆ KHÁCH HÀNG

Chương trình cứu trợ thiên tai khẩn cấp của công ty Great Oaks có thể cung cấp sự bảo vệ cho khách hàng bị ảnh hưởng bởi hỏa hoạn hoặc thiên tai khác, bao gồm COVID-19 (Coronavirus). Trong trường hợp Tiêu bang khẩn cấp được tuyên bố ở cấp tiêu bang hoặc liên bang, khách hàng đáp ứng các tiêu chí sau đây có thể đủ điều kiện cho các biện pháp bảo vệ khách hàng nhất định:

Mất mát liên quan đến thiên tai hoặc gián đoạn việc cung cấp hoặc nhận dịch vụ nước, và / hoặc sự xuống cấp của chất lượng dịch vụ tiện ích.

Nếu một trong hai tiêu chí này được đáp ứng, Công ty Nước Great Oaks sẽ:

1. Làm việc hợp tác với các khách hàng bị ảnh hưởng để giải quyết các hóa đơn chưa thanh toán và giảm thiểu việc ngắt kết nối để không thanh toán.
2. Miễn kết nối lại hoặc phí cơ sở vật chất cho khách hàng bị ảnh hưởng và tạm ngưng tiền gửi đối với khách hàng bị ảnh hưởng phải kết nối lại với hệ thống.
3. Cung cấp các tùy chọn thanh toán hợp lý cho khách hàng bị ảnh hưởng.
4. Miễn các hóa đơn cho khách hàng bị mất nhà hoặc không có nhà ở.
5. Cho phép từ bỏ pro-rata của bất kỳ yếu tố cố định nào của hóa đơn nước trong thời gian ngôi nhà không thể ở được, ngay cả khi lý do khiến nó không thể ở được không phải là do mất dịch vụ nước.

Chương trình Cứu trợ Thảm họa Khẩn cấp tuân thủ Nghị quyết M-4833 của Ủy ban Tiện ích Công cộng California và Quyết định của Ủy ban 19-07-015, khiến các biện pháp bảo vệ được liệt kê ở trên là vĩnh viễn đối với các khách hàng được phục vụ bởi các nhà cung cấp dịch vụ nước do California quản lý.

Để tìm hiểu thêm về Chương trình cứu trợ thiên tai khẩn cấp của Công ty Great Oaks, vui lòng liên hệ với Dịch vụ khách hàng theo số (408) 227-9540.