



## **GREAT OAKS WATER COMPANY**

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April 1, 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 297-W Resolution M-4849 Transition Plan for Return to Normal Operations Post-Pandemic**

Great Oaks Water Company (Great Oaks) submits this Tier 2 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 submit Transition Plan for the expiration of Emergency Customer Protections and a return to normal operation at the end of the current pandemic State of Emergency.

Attached hereto as **Exhibit A** is the Great Oaks Resolution M-4849 Transition Plan for Return to Normal Operations Post-Pandemic (Transition Plan). The Transition Plan incorporates the elements of a transition plan required by 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 2 Advice Letter pursuant to General Order 96-B and Water Industry Rule 7.3.2 and is subject to approval by the Commission's Water Division per Res. M-4849.

### 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 297-W and know the contents thereof. I certify that the facts provided in Advice Letter 297-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 April 1, 2021.

\_\_\_\_\_  
/s/

Timothy S. Guster

Certificate of Service

I hereby certify that I have this day served a copy of Great Oaks Water Co.’s Advice Letter 297-W on the parties listed on the following Distribution List by mailing a properly addressed copy by first class mail with postage prepaid or by email to those marked with an asterisk (\*). Great Oaks is also serving this Advice Letter by email to the service lists for R.17-06-024 and R.18-03-011,

Executed on April 1, 2021 at San Jose, California.

  /s/    
Timothy S. Guster

Great Oaks Water Co.  
Distribution List

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City of San Jose  
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GREAT OAKS WATER COMPANY

## **Exhibit A**

### **Resolution M-4849 Transition Plan for Return to Normal Operations Post-Pandemic**

#### **I. Introduction**

On March 4, 2020, Governor Newsom declared a State of Emergency as a result of the COVID-19 pandemic. Through a series of Executive Orders, the Governor imposed various restrictions on all Californians and their activities. The resulting impacts of those restrictions have been felt by all, but especially by Californians already experiencing financial stress. Due to the governmental restrictions, some Great Oaks Water Company (Great Oaks) customers stopped paying their water bills in full or at all. But throughout the pandemic, Great Oaks has continued to provide its customers with clean, safe, and reliable water service despite not receiving payment from some of its customers. The resulting financial stress on Great Oaks has been significant and has been reported by Great Oaks to the California Public Utilities Commission (Commission) on a regular basis.

During what we used to call “normal” times, the nonpayment of a water bill would result in a series of increasingly urgent notices to the customer that request payment or an agreed-upon payment plan to avoid a water service disconnection (shutoff) for nonpayment. In his Executive Order N-42-20, the Governor imposed a moratorium on water service disconnections for nonpayment.

The Commission has instructed Great Oaks and other water utilities under its jurisdiction to develop a Transition Plan for coming off of the current Emergency Customer Protections and the Governor’s water service disconnection moratorium

and a return to “normal” times again, with a targeted effective date of June 30, 2021 for the end of the water service disconnection moratorium.<sup>1</sup>

The following guidance from Governor Newsom’s Executive Order N-42-20 and Commission Resolution M-4849 are incorporated into this Transition Plan:

Executive Order N-42-20: “Nothing in this Order eliminates the obligation of water customers to pay for water service, prevents a water system from charging a customer for such service, or reduces the amount a customer already may owe to a water system.”<sup>2</sup>

Commission Resolution M-4849: “After the customer protection period expires, the electric, gas, and water corporations subject to this Resolution will return to implementing programs and utility services as per the non-emergency state Commission decision directives.”<sup>3</sup>

This guidance establishes that water utilities, including Great Oaks, are fully entitled to request and receive full payment for water service provided during the pandemic emergency and that non-emergency Commission-approved tariffs provide a blueprint for the transition back to “normal” times. Any regulatory action that eliminates the obligation of water customers to pay for water service provided or prevents a water system such as Great Oaks from requiring payment for water service provided would be unlawful and contrary to the explicit language of Executive Order N-42-20.

Resolution M-4849 also calls for consideration of input from the Low Income Oversight Board (LIOB) and Commission staff: “The IOUs shall consider and incorporate LIOB board member input where feasible, and any Commission staff feedback, and submit final advice letters on April 1, 2021.”<sup>4</sup> LIOB input has been included in this version of Great Oaks’ Resolution M-4849 Transition Plan for Commission staff review.

Great Oaks’ Resolution M-4849 Transition Plan provides a simple and easy-to-follow guide for customers to pay past due amounts accumulated during the

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<sup>1</sup> Commission Resolution M-4849, generally.

<sup>2</sup> Executive Order N-42-20, at p. 2.

<sup>3</sup> Commission Resolution M-4849, at p. 10.

<sup>4</sup> *Id.*, at p. 16.

pandemic emergency, avoid service disconnections for nonpayment, and continue to receive clean, safe, and reliable water service from Great Oaks. The objectives of the Great Oaks Transition Plan are to: (1) reduce customers’ anxiety about ending the Emergency Customer Protections; (2) effectively ease customers through a transition from the Emergency Customer Protections by implementing programs or initiatives to help customers through the transition and by enrolling customers in these programs and initiatives to continue to assist them in managing their water bills; and (3) proactively communicating with customers to inform them of changes in customer protections and help enroll customers in the programs and initiatives to manage the payment of their water bills.

Great Oaks believes that its Transition Plan provides an easy and near-effortless customer experience, is easy for Great Oaks to put into operation, focuses on affordability, and appropriately engages stakeholders and customers in the process.

## **II. Resolution M-4849 Transition Plan Timelines**

### **A. Procedural Timeline**

February 11, 2021	Commission issues Resolution M-4849.
February 16, 2021	Great Oaks files Advice Letter 295-W confirming continuing compliance with Emergency Customer Protections through at least June 30, 2021.
February 22, 2021	Deadline to file Tier 1 advice letters confirming continuing Emergency Customer Protections through at least June 30, 2021.
February 25, 2021	Deadline to submit draft Tier 2 advice letters with Transition Plans for the expiration of Emergency Customer Protections to CPUC staff.
February 25, 2021	Great Oaks submits draft Tier 2 Transition Plan advice letter to Gillian.Weaver@cpuc.ca.gov (via email). Division Directors begin process of reviewing draft Transition Plans.
March 11, 2021	Low Income Oversight Board (LIOB) meets to review and assess water utility draft Transition Plans.



April 1, 2021	Final Transition Plan Advice Letters (incorporating LIOB and other input) filing date. Transition Plans to become effective.
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**B. Resumption of Water Service Disconnections for Nonpayment**

Separately from the existing Emergency Customer Protections now in place, water utilities, like Great Oaks, are also subject to the ongoing moratorium on water service disconnections for nonpayment established by Executive Order N-42-20, referenced above. The end-date for the moratorium is presently unknown, as is the amount of advance notice water utilities will receive from the Governor’s Office and/or the Commission about when the moratorium will be lifted. The following timeline for the resumption of water service disconnections for nonpayment are based upon a “Disconnection Policy Resumption Date” or “DPR Date,” which is likely to be July 1, 2021, at the earliest. The actual DPR Date will be determined by the Governor’s Office/Commission. By using DPR Date (rather than a particular calendar date), this Transition Plan incorporates sufficient flexibility to utilize any date ultimately selected as the end of the Executive Order N-42-20 water service disconnection moratorium.

<b>Timeline for Resumption of Water Service Disconnections for Nonpayment</b>	
DPR Date -60	Great Oaks will begin providing notices to customers, through website postings and language on water bills, informing customers of the resumption of standard water service disconnection procedures for unpaid water bills, as authorized by its tariff rules, on the DPR Date. The tariff rules for water service disconnections are based upon the Water Shutoff Protection Act and have been authorized by the Commission.
DPR Date	Great Oaks will resume standard water service disconnection procedures for nonpayment under its existing tariff rules, including the offer of extended payment plans (up to 12 months, depending upon the individual customer’s circumstances). A customer who has agreed to an extended payment plan will not have water service disconnected if timely payments are made

	and will receive required notices if the payment plan is breached by the customer.
DPR Date +60	Disconnections for nonpayment may begin, provided Great Oaks complies with all tariff rule requirements, including: (1) contacting the customer named on the account by telephone or written notice no less than seven (7) business days before disconnection of residential water service; (2) contacting residential occupants of individually-metered multi-unit service locations who are not the customer of record by written notice at least ten (10) calendar prior to any possible water service disconnection for nonpayment; sending written notice of water service disconnection for nonpayment to detached single-family residential service locations at least seven (7) calendar days prior to any possible water service disconnection for nonpayment.

**C. Resumption of Verification/Recertification Process for Customer Assistance Program (CAP).**

DPR Date -30	Great Oaks will begin sending written notices to all CAP enrollees informing them that Great Oaks may resume applying standard CAP eligibility verification and recertification requirements authorized by its tariff rules.
DPR Date	Great Oaks may resume standard CAP eligibility verification and recertification requirements.

**D. Reconnection Fees.**

DPR Date -30	Great Oaks will provide notice through website postings and language on bills that it will be resuming standard reconnection fees when water service is disconnected for nonpayment on DPR Date.
DPR Date	Reconnection fees for water service disconnections for nonpayment resume, as authorized by tariff rules.

**III. Marketing, Education, and Outreach Strategy**

Per Resolution M-4849: “The IOUs shall include a coordinated, effective, and efficient strategy for their marketing, education, and outreach plan to engage and enroll customers in new bill management programs, to inform customers already enrolled in programs about changes due to the Emergency Customer Protections

being no longer in effect after June 30, 2021 (and in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor’s Executive Order N-42-20), and to inform customers of the extension of the customer protections, where necessary.”<sup>5</sup>

The following Marketing, Education, and Outreach (ME&O) Strategy supports the Great Oaks Transition Plan by effectively easing customers through a transition from the Emergency Customer Protections (and the future expiration of the disconnection moratorium in Executive Order N-42-20) by proactively communicating with customers to enroll them in programs to manage payment of their utility bills and informing them of the changes to the programs in which they are already enrolled (if any). The ME&O Strategy has been developed with a customer-impact lens and is part of a coordinated and effective marketing, education, and outreach program. The ME&O Strategy was prepared in coordination with other Class A investor-owned water utilities and includes consideration of the input from the Low Income Oversight Board (LIOB).

**A. Target Audiences.**

Great Oaks’ ME&O Strategy is intended to reach all customers, but is specifically targeted to the following customer groups: (1) customers enrolled in extended bill payment plans; (2) customers with past-due balances on their accounts; (3) customers who may qualify for service disconnection preventions for medical reasons pursuant to the Water Shutoff Protection Act and tariff rules; (4) customers enrolled and/or eligible for Great Oaks’ CAP; and (5) customer segments considered hard-to-reach and those residing in areas designated as low-income or disadvantaged communities.

**B. ME&O Activities for All Customers.**

Great Oaks will utilize existing communications channels to educate and inform customers about the expected June 30, 2021 expiration of Emergency Customer Protections.<sup>6</sup> Customers will also be educated and informed about

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<sup>5</sup> *Id.*, at p. 12.

<sup>6</sup> Existing communications channels will be utilized to minimize costs.

extended payment plan options, conservation programs, and, when appropriate, any extensions of Emergency Customer Protections.

Great Oaks will utilize website messaging and alerts, bill language, bill inserts, Customer Service talking points and training, and office signage (where and when appropriate).

### **C. Targeted Outreach.**

In addition to the above, Great Oaks will utilize targeted proactive outreach for the customer groups listed above (in Section III.A.) during telephone communications, through email communications, and through mailed and posted notices. The targeted outreach will convey information about: (1) Water Shutoff Protection Act notices and options, as well as potential water service disconnections for nonpayment; (2) any necessary customer actions, including recertifications for Great Oaks' CAP and breaches of payment plan terms and conditions that may result in water service disconnections for nonpayment; (3) payment plan options that are available to help customers avoid water service disconnections for nonpayment; (4) resumption of tariff-authorized reconnection fees; (5) water service disconnection warnings and notices; and (6) qualifications for disconnection protections for medical reasons under the Water Shutoff Protection Act.

### **D. Additional ME&O Outreach Activities.**

Additional communication methods that may be utilized by Great Oaks in its ME&O Strategy include information posted on the Great Oaks website, direct customer contact (*i.e.*, door tags), information in multiple languages, and by information provided by field personnel (when approached in the field by customers).

### **E. Partnerships.**

Great Oaks will seek to identify and establish partnerships with community-based and other organizations that regularly interact with targeted customer groups to expand its outreach activities. This will include efforts to establish a working partnership with the California Department of Community Services and Development and its local service providers to leverage their customer interactions

for expanding outreach efforts on Great Oaks' bill payment options and arrangements.

On March 24, 2021, LIOB recommended that water utilities “leverage community-based organizations and human services agencies located within these areas [customer segments considered hard-to-reach, underserved, and those residing in areas designated as low-income or disadvantaged communities] to promote direct messaging campaigns.” There are no community-based organizations and human services agencies located in Great Oaks' service area. Nevertheless, Great Oaks will seek to identify and establish partnerships with community-based organizations and other organizations that regularly interact with targeted customers to expand outreach efforts.

Within the investor-owned water utility industry, Great Oaks will continue to work and coordinate its efforts with the California Water Association (CWA) and its member companies. Included in this work will be potential partnering with the California Special Districts Association (CSDA) and its local service providers to promote programs offered by local regulated water utilities, additional data exchange(s) with investor-owned energy utilities to identify potential customers eligible for Great Oaks' CAP and seeking partnerships with diverse suppliers to assist investor-owned water utilities in implementing their ME&O Strategies.

#### **F. Incremental Costs.**

Great Oaks does not have a budget for ME&O Activities, so to the extent it is possible, Great Oaks will utilize Commission-approved funding for other programs, so long as the utilization of such funding does not compromise the effectiveness and integrity of the programs and services such funding was authorized. Great Oaks' conservation and CAP program have specifically approved costs (D.19-09-010), with no “extra” funds available for ME&O costs. At this time, Great Oaks does not have an estimate for costs of the Great Oaks Transition Plan. When or if such an estimate is available, Great Oaks will update its information accordingly.

On March 24, 2021, LIOB recommended that water utilities increase their ME&O budgets by 50% for the transition period. As Great Oaks does not have an

ME&O budget, Great Oaks is not able to increase its ME&O budget by any amount without approval by the California Public Utilities Commission. Great Oaks does, however, request authority to utilize and recover the costs of a new communications program to meet the Commission's goals and LIOB's recommendations (see below).

(a) Request for Authority to Utilize and Recover Costs of New of Communications Program to Meet the Commission's Goals and LIOB's Recommendations.

Great Oaks has explored options to increase and enhance its customer communications so as to better reach all of its customers who need or may be eligible for some form of assistance with unpaid water bills that have accumulated during the pandemic. This communications program would include working with all local government and other social services agencies and groups to reach more customers in better ways. The estimated cost of this new communications program would be in the range of \$10,000 to \$15,000 per month. Great Oaks is requesting that the Commission authorize Great Oaks to move forward with this program and to recover the costs of the program. The initial time period for the program is from July 1, 2021 through June 30, 2022.

If approved, Great Oaks suggests that the incremental costs of the new communications program be recorded in its Catastrophic Event Memorandum Account (CEMA) that has been activated specifically for the pandemic emergency and that the Commission state unequivocally that such incremental costs are recoverable through a CEMA amortization.

This is not a time for increasing the already increased risks Great Oaks is facing from unpaid water bills that have accumulated during the pandemic. Without confirming that Great Oaks may record and recover the incremental costs of the new communications program through its CEMA, Great Oaks will not engage in this new spending.

Great Oaks can and will provide information to the Water Division about this proposed new program upon request. If approved, Great Oaks will include the ongoing costs of the program in its next general rate case application and with an effective date of July 1, 2022.

#### **IV. Compliance and Safety**

Resolution M-4849 provides: “Each IOU must explain in their Transition Plan Advice Letter how the transition plan maintains alignment with program enrollment targets, program eligibility requirements, and customer protections in effect outside Emergency Customer Protections (e.g., bans on requirements that energy customers pay a deposit to enroll in 12-month payment plan) established by Commission Decisions for relevant programs as outlined in Section 1, Activities Timeline.”<sup>7</sup>

##### **A. Alignment with Program Enrollment Targets and Requirements.**

On April 29, 2021, Great Oaks filed Advice Letter 288-W, showing compliance with Commission Resolution M-4842 and confirming compliance with then-Executive Director Alice Stebbins’ March 20, 2021 letter (and demonstrating compliance with applicable provisions of the Emergency Customer Protections required under Commission Decision (D.) 19-07-015). On February 16, 2021, filed Advice Letter 295-W in compliance with Resolution M-4849, extending the Emergency Customer Protections through June 30, 2021. With these filings, Great Oaks has complied with Commission Decision directives pertaining to pandemic emergency customer protections.

Great Oaks has complied with the moratorium on water service disconnections for nonpayment ordered by Executive Order N-42-20 as well. There have been no water service disconnections for nonpayment by Great Oaks since before the declaration of the pandemic State of Emergency.

The Great Oaks Transition Plan ensures compliance with the Water Shutoff Protection Act tariffs approved by the Commission when the moratorium on water service disconnections for nonpayment is lifted.

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<sup>7</sup> Resolution M-4849, at p. 14.

Based upon data through January 2021, and assuming that customers with past due balances on their accounts of 90 days or more would be facing water service disconnections for nonpayment upon the lifting of Emergency Customer Protections and the moratorium on water service disconnections for nonpayment, Great Oaks estimates that the percentage of single-family residential customers facing a possible disconnection for an unpaid water bill that is aged<sup>8</sup> between 90 and 120 days is 1.5 percent (295 out of 19,984 total single-family residential customers). Great Oaks further estimates that the percentage of single-family residential customers facing a possible disconnection for an unpaid water bill that is aged more than 120 days is 4.4 percent (877 out of 19,984 total single-family residential customers).

Great Oaks is in agreement with and supports quarterly data exchanges to update its CAP enrollment process. A data exchange occurred at the end of March, 2021, and Great Oaks is presently processing the data to utilize for CAP enrollments.

#### **B. Compliance with State and Local Health Orders.**

Great Oaks has complied and adhered to all State and local health orders, including all Santa Clara County Department of Public Health orders and requirements. Great Oaks closed its walk-in Customer Service operations on March 13, 2021 and has maintained social distancing protocols throughout the pandemic emergency.

#### **V. Progress Tracking and Reporting**

Great Oaks has and will continue to comply with all Commission reporting requirements pertaining to past due customer accounts (sometimes referred to as “arrearages”) in R.17-06-024 and in any other proceeding requiring such reporting, until directed to do otherwise.

On March 24, 2021, LIOB recommended that water utilities define and measure “success” as part of the progress tracking and reporting plan. Included

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<sup>8</sup> In this context, “aged” means the number days since a water bill was mailed.



within this recommendation is an additional recommendation that each utility include its own definition of “success” in its plan. LIOB also recommended that utility reporting include the median and average lengths of disconnections and the median and amount past due from a disconnection.

As the stated goals of the Transition Plans are to minimize disconnections and impacts of transitioning off Emergency Customer Protections, Great Oaks defines success as the avoidance of disconnections through payment of past due balances. The payment of past due balances includes a customer agreement to pay the past due balance through a payment plan and payment of the past due balance in full.

**A. CAP Enrollment Reporting.**

Great Oaks will report on the following with respect to its CAP: (1) number and percent of newly enrolled customers that are eligible to remain on Great Oaks CAP after June 30, 2021; and (2) number and percent of customers required to take actions to remain enrolled in the Great Oaks CAP (including recertifications of eligibility) and that successfully remain enrolled after taking such actions.

**B. Reporting of Enrollments of Impacted Customers in Payment Plans.**

Great Oaks will report on the following to track enrollments of impacted customers in payment plans: (1) number and percentage of customers enrolled in payment plans (plans that provide payment of past-due balances plus current charges); (2) number and percentage of customers disconnected for nonpayment; (3) changes in past due amounts (to the extent that such information is not already tracked and reported in another proceeding).

**C. Reporting of Data in the Event of Disconnections.**

Included within the LIOB Recommendations are the following reporting requirements:

- What were the median and average lengths of disconnections?
- What were the median and average arrearage amount and time past due from a disconnection?

Great Oaks will include this data in reporting when, or if, there is a disconnection.

#### **D. Emergency Rental Relief and Other Pandemic Financial Assistance Programs.**

On March 30, 2021, the Water Division requested that utilities, such as Great Oaks, include information in their Transition Plans about communicating with customers regarding funding opportunities for utility bill assistance.<sup>9</sup> An example of such a program offered in Sacramento County was provided. Santa Clara County has an Emergency Rental Assistance Program<sup>10</sup>, but the program does not, at present, include assistance with unpaid pandemic utility bills. Other programs offered in Santa Clara County, including non-governmental utility bill assistance programs, address unpaid energy utility bills, but not unpaid water bills at this time.<sup>11</sup> Great Oaks will monitor the situation and, should government or other financial assistance become available for Great Oaks customers to pay unpaid pandemic water bills, *and Great Oaks receives information that such funding was used to pay an otherwise unpaid pandemic water bill*,<sup>12</sup> Great Oaks will include information about such programs in its communications program.

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<sup>9</sup> Email from Bradley Leong dated March 30, 2021.

<sup>10</sup> See: [Emergency Rental Assistance Program | City of Santa Clara \(santaclaraca.gov\)](https://www.santaclaraca.gov/emergency-rental-assistance-program).

<sup>11</sup> See, e.g., [Santa Clara County assistance programs | San Jose \(needhelppayingbills.com\)](https://www.santaclaracounty.gov/assistance-programs).

<sup>12</sup> The source of funding used by a customer to pay a water bill is seldom known by Great Oaks or reported to Great Oaks by its customers.