

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 13, 2020

Edward N. Jackson  
Director, Rates and Regulatory Affairs  
Liberty Utilities (West Region)  
9750 Washburn Road  
P. O. Box 7002  
Downey, CA 90241

Dear Mr. Jackson,

The Commission has approved Liberty Utilities (Park Water) Corp's Advice Letter No. 297, filed on March 24, 2020, regarding your Implementation of Emergency Disaster Relief Program for COVID-19.

Enclosed is a copy of the advice letter with an effective date of March 4, 2020 for the utility's files:

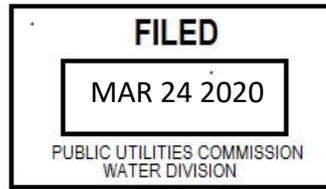
Please contact Jefferson Hancock at 415-703-3453, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant  
Water & Sewer Advisory Branch  
Water Division

Enclosures



Advice Letter No. 297-W

March 24, 2020

## TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

### **Summary**

Liberty Utilities (Park Water) Corp. (U 314-W) (“Liberty Park Water”) hereby submits this advice letter to notify the California Public Utilities Commission (“Commission”) of Liberty Park Water’s implementation of emergency customer protections for customers impacted by the COVID-19 pandemic. This advice letter is made pursuant to Decision 19-07-015 implementing a Disaster Relief Program and the Commission Executive Director’s March 17, 2020 letter addressing Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency. This advice letter also informs the Commission of other customer protection measures implemented by Liberty Park Water not mandated by D.19-07-015.

### **Background and Discussion**

In D.19-07-015, the Commission established a set of minimum emergency disaster customer protection measures that utilities are directed to implement in the event of a declared emergency. Emergency disaster customer relief protections shall apply to utility customers in affected areas if a state of emergency is declared by the Governor of California or the President of the United States.

On March 4, 2020, Governor Gavin Newsom declared a state of emergency<sup>1</sup> in California as part of its response to the COVID-19 pandemic. On March 13, 2020, President Trump signed an Emergency Declaration to facilitate the federal response to the emerging pandemic. On March 19, 2020, Governor Newsom issued an Executive Order N-33-20 to stay home.

On March 17, 2020, Commission Executive Director Alice Stebbins issued a letter, subject to Commission ratification, directing water utilities to extend the “applicable customer protections mandated in D.19-07-015” to customers in response to the declared state of emergency for the COVID-19 crisis. While COVID-19 has not resulted in the loss or disruption of the delivery or receipt of utility service or the degradation of the quality of utility service, Liberty Park Water understands that customers may face economic hardship associated with COVID-19. Therefore, consistent with the proposed directive, Liberty Park Water has enacted certain emergency customer protections. Liberty Park Water has activated its Emergency Disaster Relief Program (“Program”) and Catastrophic Event Memorandum Account (“CEMA”), effective March 4, 2020, pursuant to the letter from Executive Director Stebbins. Liberty Park Water will use the CEMA to record costs associated with its response to COVID-19.

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<sup>1</sup> Governor Newsom’s Declaration of a State of Emergency, available at: <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-helpstate-prepare-for-broader-spread-of-covid-19/>.

### **Eligibility Requirements and Time Limits for Emergency Customer Protections**

Liberty Park Water will offer the consumer protections described in this letter to all residential and small business customers affected by COVID-19 in its service territory.

With respect to when these protections will end, there are many unknowns as to the full scope and impact of this pandemic. The pandemic has not caused disruption or degradation of service. Liberty Park Water is committed to implementing the following protections for up to one year, retroactive to March 4, 2020. This is consistent with D.19-07-015, which mandates that protections conclude no sooner than 12 months from the date of the original emergency declaration. If and when the impacts of the pandemic change, Liberty Park Water will file a revised Tier 1 advice letter modifying the time limits on the customer protections described herein.

### **Description of Adopted Customer Protections**

In response to the COVID-19 pandemic, Liberty Park Water has implemented the following applicable customer protections identified in D.19-07-015. Liberty Park Water customers experiencing economic hardship due to the COVID-19 outbreak will be afforded the following protections:

- Liberty Park Water has suspended service disconnections for non-payment for residential and business customers.
- Liberty Park Water has waived disconnection and late fees and security deposits to affected customers.
- Liberty Park Water has temporarily suspended all California Alternative Rates for Water (CARW) removals and discontinued recertification and verification requests for the CARW program.
- Liberty Park Water has encouraged customers who have questions or who may be facing potential hardship to contact customer service. Liberty Park Water staff is trained and ready to inform and support customers who may experience financial difficulty because of COVID-19. Liberty Park Water offers a variety of payment options and can assist customers with payment arrangements if needed. Customers are encouraged to utilize the payment methods available on Liberty Park Water's website and to call with questions at (800) 727-5987.

### **Customer Communication Plan**

Liberty Park Water has implemented the following methods of outreach regarding the customer protections described above:

- Liberty Park Water has begun notifying customers by website, social media, and direct mail.
- Liberty Park Water has started notifying local government and/or elected officials by email that the Program is in effect.
- Liberty Park Water has a 24-hour emergency hotline equipped to answer calls from customers seven days a week, 365 days a year.
- Liberty Park Water has added a page on its website dedicated to updates. Updates will also be shared via email and social media posts.
- Within 72 hours of the conclusion of this emergency, Liberty Park Water will place calls throughout its territory regarding emergency relief customer protections.

### **Protecting the Health and Safety of Employees and Customers**

In addition to the customer protection measures and customer outreach plan described above, Liberty Park Water has implemented the following protective measures to safeguard the health and safety of employees and customers:

- Liberty Park Water has a pandemic preparedness plan and a task force that is working with guidance from the Centers for Disease Control and Prevention (“CDC”). This task force has spent several weeks preparing for how the virus might impact the organization and communities served and how to respond appropriately.
- Liberty Park Water continues to monitor the situation and actively share updates and information with employees (weekly or more often as needed) so they can keep themselves, their families, and their community safe.
- Liberty Park Water has deployed social distancing policies, identified key staff, and separated them. Liberty Park Water has instituted a remote workplace separation program for those business functions for which this is practicable.
- Liberty Park Water has implemented deep cleaning in its offices by using third-party disinfection services.
- Liberty Park Water has provided customer service representatives and field personnel with gloves and additional protective supplies and requires social distancing of at least six feet for interactions with customers.
- Liberty Park Water has limited employee travel, suspended in-person meetings, and postponed larger gatherings and events.
- Liberty Park Water requires employees to follow the CDC recommendations on personal safety, such as frequent hand washing and distancing from others who are sick.
- Liberty Park Water requires employees who feel sick or have concerns regarding potential exposure to stay at home.

### **Catastrophic Event Memorandum Account**

Liberty Park Water will record costs associated with the protections described herein in the CEMA. This includes, but is not limited to, loss of revenues for uncollected bills and expenditures incurred in the response to COVID-19 (e.g., customer notices, supplies and equipment). The costs recorded to the CEMA will be incurred beginning March 4, 2020, which is the start date of the Governor’s emergency proclamation.

No cost information is required for this advice letter filing.

### **Tier Designation**

Pursuant to D.19-07-015, this advice letter is submitted with a Tier 1 designation.

### **Effective Date**

Pursuant to the letter of Executive Director Stebbins, Liberty Park Water requests this filing become effective on March 4, 2020.

### **Notice and Service**

In accordance with General Order 96-B, General Rules 4.3 and 7.2, and Water Industry Rule 4.1, a copy of this advice letter will be electronically transmitted on March 24, 2020 to competing and adjacent utilities and other utilities or interested parties having requested such notification. During

the COVID-19 pandemic, Liberty Park Water can only provide electronic copies of this advice letter to the service list.

Pursuant to Water Industry Rule 3.2 of General Order 96-B, public notice is not required.

**Response or Protest**

Anyone may respond to or protest 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 the specific grounds on which it is based. These grounds are:

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

A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

A response or protest must be made in writing or by electronic mail and must be received by the Division of Water and Audits within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3<sup>rd</sup> floor  
California Public Utilities Commission  
505 Van Ness Avenue, San Francisco, CA 94102  
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 by mail (or e-mail) to us, addressed to:

Edward N. Jackson  
Director, Rates and Regulatory Affairs  
Liberty Utilities (West Region)  
9750 Washburn Road  
P. O. Box 7002  
Downey, CA 90241  
Fax: (562) 861-5902  
E-Mail: [AdviceLetterService@libertyutilities.com](mailto:AdviceLetterService@libertyutilities.com)

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Division of Water and Audits within the 20-day protest period so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

If you have not received a reply to your protest within 10 business days, contact Edward Jackson at (562) 923-0711.

Very truly yours,

LIBERTY UTILITIES (PARK WATER) CORP.

*/s/ Edward N. Jackson*

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Edward N. Jackson  
Director, Rates and Regulatory Affairs (West Region)  
562.923.0711  
[Edward.Jackson@libertyutilities.com](mailto:Edward.Jackson@libertyutilities.com)

cc: Service List R.18-03-011