

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 18, 2021

Robert L. Kelly  
Vice President, Regulatory Affairs  
Suburban Water Systems  
1325 N. Grand Ave., Ste. 100  
Covina, CA 91724-4044

Dear Mr. Kelly,

The Commission has approved Suburban Water Systems' Advice Letter No. 351, filed on February 22, 2021, regarding Extending Emergency Customer Protections to June 30, 2021.

Enclosed is a copy of the advice letter with an effective date of February 22, 2021 for the utility's files.

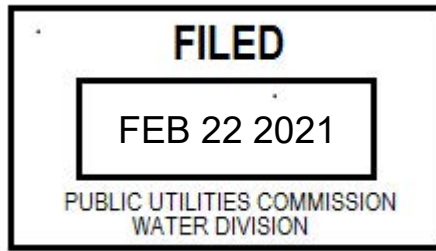
Please contact Bradley Leong at [BL4@cpuc.ca.gov](mailto:BL4@cpuc.ca.gov) or 415-703-2307, if you have any questions.

Thank you,

/s/ROBIN BRYANT

Robin Bryant  
Water Division

Enclosures



**Suburban  
Water Systems**

**A SouthWest Water Company**

1325 N. Grand Ave. Ste. 100, Covina, CA 91724-4044  
Phone: 626.543.2500, Fax: 626.331.4848  
www.swwc.com

U-339-W

**VIA EMAIL**

ADVICE LETTER NO. 351-W

February 22, 2021

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Suburban Water Systems (Suburban) 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, Suburban 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, Suburban notified then-Commission Executive Director Alice Stebbins, in writing, that Suburban had activated its CEMA, with an effective date of March 4, 2020. Suburban's 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.**

At this time Suburban is not aware of any losses that are covered by its insurance.

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

Throughout the COVID-19 pandemic emergency, Suburban has worked cooperatively with its customers to resolve unpaid bills. In particular, Suburban has communicated the Emergency Customer Protections to its customers via its website and bill inserts. In addition, Suburban has sent additional notices to customers by mail who are more than 60 days past due and who have a balance due of \$75 or more. Such notices invite those customers to contact Suburban customer service to arrange for full or partial payment 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 Suburban, 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 Suburban 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 Suburban or not.

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

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

**(5) Provide reasonable payment options to customers.**

Suburban 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 Suburban believes is both a reasonable and flexible method of offering such payment options. Suburban 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 Suburban 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, Suburban filed Advice Letter 347-W on April 30, 2020, which stated that the current COVID-19 pandemic emergency is viral and does not damage or destroy real property. Therefore, Suburban has not extended these protections to customers and has instead emphasized the pertinent relief available to customers during this emergency. On May 26, 2020, the Commission's Water Division approved of Suburban Advice Letter 347-W. Suburban confirms that it will continue to maintain compliance with these Emergency Customer Protections throughout the pandemic emergency.

Finally, Suburban 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. Suburban 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.

### **Tier Designation and Effective Date**

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). Suburban requests that the Advice Letter is effective upon filing, February 22, 2021.

### **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 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; 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 relitigating 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 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, 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:

Suburban Water Systems, Robert L. Kelly, V.P. Regulatory Affairs, 1325 N. Grand Avenue, Suite 100, Covina, CA 91724, FAX (626) 331-4848, or e-mail [bkelly@swwc.com](mailto:bkelly@swwc.com)

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division, 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.

Replies: The utility shall reply to each protest and may reply to any response. Each reply must be received by the Division of Water and Audits within 5 business days after the end of the protest period, and shall be served on the same day to the person who filed the protest or response.

If you have not received a reply to your protest within 10 business days, contact Suburban Water Systems at (626) 543-2500.

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

In compliance with Water Industry Rule 4.3 of General Order 96-B, a copy of this advice letter has been mailed or electronically transmitted to all interested and affected parties as detailed in Attachment A.

Sincerely,

/s/Robert L. Kelly

Robert L. Kelly  
Vice President, Regulatory Affairs

#### Verification

I, Robert L. Kelly, am Vice President Regulatory Affairs of Suburban Water Systems. I have read the contents of Advice Letter 351-W and know the contents thereof. I certify that the facts provided in Advice Letter 351-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 Covina, CA on February 22, 2021.

/s/Robert L. Kelly

Robert L. Kelly