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ALJ/KWZ/mef 11/24/2021

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

Order Instituting Rulemaking  
Evaluating the Commission's 2010  
Water Action Plan Objective of  
Achieving Consistency between Class  
A Water Utilities' Low-Income Rate  
Assistance Programs, Providing Rate  
Assistance to All Low-Income  
Customers of Investor-Owned Water  
Utilities, and Affordability.

Rulemaking 17-06-024

**ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENT ON  
REVISIONS TO MONTHLY REPORTING REQUIREMENTS**

This Ruling proposes revisions to the monthly reporting requirements for Class A water utilities and seeks comments on the proposed revisions by December 15, 2021. Better data reporting will enhance the record on the scoped issue ("What, if any, further improvements to water affordability are needed"), as recovery from the COVID-19 period ensues.

**1. Background**

During Phase II of this proceeding, Class A water utilities reported the following data biweekly for the first few months of the pandemic and have continued reporting them monthly since September 2020. The reporting during the Phase II included:

- Number of customers requesting bill assistance
- Number of newly enrolled customers to your low-income rate assistance program
- Number of overall enrolled customers in your low-income rate assistance program
- Number of customers late or behind on their bill
- Average arrearage amount
- Median arrearage amount
- Range of arrearage amount
- Overall arrearage amount
- Number of customers making partial payments<sup>1</sup>

Beginning with reports filed October 2020, the Class A water utilities provided the required data by three separate customer groups: residential customers excluding customers enrolled in the Customer Assistance Program (CAP), residential customers enrolled in CAP, and all remaining customers.<sup>2</sup> The monthly reports are public and served to parties to this proceeding.<sup>3</sup>

Decision (D.) 21-07-029 continued the above Phase II monthly reporting<sup>4</sup> and added two more metrics

- Number of customers disconnected for nonpayment
- Number of customers reconnected following disconnection for nonpayment<sup>5</sup>

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<sup>1</sup> Second Amended Scoping Memo, dated June 2, 2020, at 4-5.

<sup>2</sup> Pursuant to Administrative Law Judge (ALJ) ruling, dated September 16, 2020.

<sup>3</sup> Pursuant to ALJ rulings, dated September 16, 2020, and February 22, 2021.

<sup>4</sup> D.21-07-029 Ordering Paragraph (OP) 10.

<sup>5</sup> D.21-07-029 OP 11.

In D.21-07-029, we also directed monthly data reporting working sessions,<sup>6</sup> to ensure “reporting that reflects the age of arrearages aligned with the Water Shutoff Protection Act<sup>7</sup> timelines,” “eliminating unused data elements from the required reporting,” and collection of “more specific information about payment plans, bill payment ratios, and external funding applied to arrearages.”<sup>8</sup>

On August 25, 2021, the data reporting working sessions began and those sessions have continued monthly. The agendas are included in Attachment A to this Ruling. All nine Class A water utilities have participated in each data reporting working sessions to date.

At the time D.21-07-029 issued, Governor Newsom’s Executive Order N-08-21 had extended the statewide water disconnection moratorium until September 30, 2021. Since then, the governor signed Senate Bill (SB) 155, which further extends the statewide water disconnection moratorium until December 31, 2021.

## **2. Purpose of Reporting**

The Commission oversees regulated water utilities’ compliance with existing law. In the Water Shutoff Protection Act, the legislature declared “the established policy of the state that every human being has the right to safe, clean, affordable and accessible water adequate for human consumption, cooking and sanitary purposes.”<sup>9</sup> In D.21-07-029, the Commission stated, “the implementation of today’s directives depends on better data reporting, including

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<sup>6</sup> D.21-07-029 OP 12.

<sup>7</sup> The Water Shutoff Protection Act was enacted in 2018 by SB 998.

<sup>8</sup> D.21-07-029 at 69-70.

<sup>9</sup> SB 998, known as the Water Shutoff Protection Act.

more specific information about payment plans, bill payment ratios, and external funding applied to arrearages.”<sup>10</sup>

Better data reporting is foundational to considering the issue of “What, if any, further improvements to water affordability are needed,<sup>11</sup> including the effectiveness of low-income water rate assistance programs as means of promoting water affordability,<sup>12</sup> assessing recovery from the COVID-19 period, and making data-driven improvements to affordability, in coordination with the State Water Board.<sup>13</sup>

Better data reporting is critical to understanding how the state and Commission relief payments and programs help water utilities and their customers. The Water Shutoff Protection Act’s main feature is payment plans.<sup>14</sup> As noted in D.21-07-029, the Water Shutoff Protection Act was superseded by the

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<sup>10</sup> D.21-07-029 at 70.

<sup>11</sup> Third Amended Scoping Memo dated July 30, 2021, at 6.

<sup>12</sup> D.21-07-029 Finding of Fact 22.

<sup>13</sup> D.21-07-029 at 64. *Also see* Scoping Memo dated January 19, 2018, at 3.

<sup>14</sup> The Water Shutoff Protection Act, *inter alia*: (1) extends the time period before utilities may initiate collections action on unpaid water utility bills to 60 days; (2) enhances notice to customers of opportunities to make special arrangements to pay debt over longer terms; and (3) prohibits disconnection while a customer’s appeal of the water bill is pending. For qualifying low-income customers, the Water Shutoff Protection Act caps reconnection fees and waives interest charges (including late fees) once a year. For the majority of residential customers, the protections of the Act are longer timelines prior to disconnection. The Act’s disconnection prohibition is applicable only to small subsets of residential water customers. As specified in HSC § 116910, low-income customers that can get documentation from a primary care provider stating that discontinuation of water service would be life threatening or pose a serious threat to health and safety and remain compliant with the terms of special payment arrangements may not be disconnected unless they become delinquent again for at least 60 days. As specified in HSC § 116916, renters whose landlord defaults on bills long enough that disconnection is imminent may not be disconnected until they have been given the opportunity to become the customer moving forward. (California Health and Safety Code §§ 116908-116914)

disconnection moratorium, as protection from disconnection was absolute during the moratorium.<sup>15</sup>

Now, concurrent with the Phase III of this proceeding, the State Water Board's Water and Wastewater Arrearage Payment Program is beginning to make payments that will cover arrearages accrued from March 2020 through June 2021. By January 2022, we expect these COVID-19-era relief payments to be applied to customer accounts, and the Commission's focus will turn to the remaining arrearages, which will need to be addressed through payment plans. Once disconnections resume, it is incumbent upon the Commission to monitor the effectiveness of payment plans, the main feature of the Water Shutoff Protection Act.<sup>16</sup>

**2.1. How Reported Data Has Been Presented  
To-Date to Evaluate Affordability and  
Impacts on Water Utilities and their Customers**

Stakeholders may wish to review prior Commission presentations of Class A water utilities' reported data in this proceeding to date, to better inform their comments on today's Ruling.<sup>17</sup> The Commission presented data trends and summaries of water utility and customer payments and arrearages in the *ALJ Ruling Seeking Comment on Strategies to Manage the Impact of the COVID-19*

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<sup>15</sup> Because implementation of the Act began February 1, 2020, and the statewide disconnection moratorium went into effect March 4, 2020, there was not time for the Act to be implemented.

<sup>16</sup> D.21-07-029 at 7, and Conclusion of Law 2.

<sup>17</sup> Because the water utilities' monthly data reports are public and served on the service list in Excel format, all parties have the ability to summarize and analyze the water utility monthly data independently.

*Pandemic on Water Customers and Utilities*,<sup>18</sup> D.21-07-029,<sup>19</sup> and the *Ruling Setting Joint Status Conference and Ordering Comments*.<sup>20</sup>

To further the discussion, participants<sup>21</sup> to the data reporting working sessions to date have received and discussed the most current Water Division summaries and analyses of reported data. On October 26, 2021, Water Division staff provided participants the *Water Division Summary of the Latest Statistical Reports From the Class A Water Utility Companies Including Reporting Through September 2021*. Water Division staff also shared with participants at the October 27, 2021, data reporting working session the *Potential Results from SWB [State Water Board] Coverage of Arrearages and Comparison to 2019*.<sup>22</sup>

### **3. Proposed Elimination of Unused Data Elements**

In these data reporting working sessions, parties suggested eliminating reporting that does not help the Commission answer the questions identified in Section 2. This is a reasonable suggestion. Accordingly, the following formerly required data will no longer be required going forward, in order to make room for more useful and necessary data elements described in Sections 4, 5, and 6

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<sup>18</sup> See Attachment A to ALJ Ruling Seeking Comment on Strategies to Manage the Impact of the COVID-19 Pandemic on Water Customers and Utilities, dated October 12, 2020.

<sup>19</sup> See Tables 2-8 and Attachments B, C, D in D.21-07-029.

<sup>20</sup> See Attachments A and B to the Ruling Setting Joint Status Conference and Ordering Comments, dated July 29, 2021.

<sup>21</sup> Data reporting working sessions are remote and are open to all stakeholders. Sessions are noticed to the R.17-06-024 service list approximately a week in advance, and RSVPs and topics for the agenda are solicited in the notice. Participants who RSVP are provided full audio and video capability. Those who RSVP have received the most current Water Divisions summaries and analyses of reported data.

<sup>22</sup> On October 29, 2021, the *Potential Results from SWB [State Water Board] Coverage of Arrearages and Comparison to 2019* was updated and distributed to those in attendance at the October 27, 2021, data reporting working session.

below. Parties should comment on eliminating reporting of the below identified reporting requirements:

- Number of customers requesting billing assistance  
This category being reported is ill-defined, differs from company to company, and is not objective or helpful. This category is proposed to be replaced as discussed in Section 5 below.
- Range of arrearage amount  
Companies are reporting a low number (such as one cent or \$50) and a high number, the maximum. The maximum number is not representative or helpful for policy making. It apparently does not represent customers with income problems, but other extreme results, such as an undetected leak.
- Number of customers making partial payments  
The meaning of the reported data is not consistent from company to company. Any payment less than the invoice amount can be considered a partial payment, whereas it may be thought to be the number of customers on programs to cover partial payment of arrearages. There may be more valuable metrics to following the progress of water customers making formal arrangements to deal with their arrearages, as proposed in Section 4.

#### **4. Arrearage Reporting to Align with Water Shutoff Protection Act**

Stakeholders in the data reporting working sessions clarified their approaches to classifying unpaid bills as arrearages, for reporting purposes. Stakeholders should comment on 1) conforming reporting of arrearage values, to one value for arrearages based on 79 days past the invoice date, and 2) excluding former customers (may also be termed “non-active” customers) who terminate service on their own initiative prior to accruing arrearages.

These refinements would apply to the following required data elements:

- Average arrearage amount
- Median arrearage amount
- Overall arrearage amount
- Customers in arrears

Bills are considered late 19 days after the date of the invoice, and the billed revenue that remains unpaid is termed an arrearage. The overall arrearage amount currently required each month is the sum of all arrearages. At the data reporting working sessions, the Water Division staff reviewed the Water Division Standard Practice U28W, Section C-6, where the 19-days-after-invoice is established. Many Class A water utilities confirmed that they adhere to this standard practice.

The Water Shutoff Protection Act extends the time period before utilities may initiate collections action on late water utility bills to 60 days; that 60 days combined with the 19 days after the invoice is issued, water utility customers should not be subject to disconnection until 79 days after invoice.

Currently, water utilities report the arrearage metrics based on amounts unpaid after 19 days. Some, but not all water utilities further divide and report arrearage amounts by length-of-time overdue, such as 30, 60 or 90 days late.

For three primary reasons, we propose reporting arrearages consistent with the Water Shutoff Protection Act timeline, one value equating to the amount outstanding 79 days after invoice. In the data reporting working sessions, the Water Division staff termed this value “eligible arrearages,” referring to arrearages that are eligible for collections action.

Reporting arrearages close to the due date is less useful. Many customers are aware that penalties may not be imposed until weeks or even months after the official due date, and therefore including the most recent arrearages is likely



to capture payment lag rather than payment trouble. Secondly, because the water utility may not take collections action until 79 days after invoice, capturing arrearages 79 days or later past the invoice date allows the Commission to track compliance with the Water Shutoff Protection Act timeline.

Finally, we prefer and propose one single value for arrearages, rather than arrearage amounts divided by length-of-time overdue (also known as age of arrears), because 1) customers are unlikely to view their water utility bill debt so discretely, and 2) the exercise of matching a single customer account in arrears to multiple discrete ages of arrears is fraught.

Customers do not separately pay their bills for current service and their bills for pre-existing arrears each month. Customers instead pay (or fail to pay) their total bill. From an affordability perspective, therefore, it makes no difference whether that total payment is unaffordable due to the bill for current service or due to a pre-existing arrearage.

Participants to the data reporting working sessions have considered how to overcome the difficulty of matching the number of customer accounts in arrears to the age of arrears. These discussions resolved to divide arrearage amounts into only two categories: the current practice of reporting arrearage amounts 19 days after the invoice, and the “eligible arrearage amounts” 79 days after invoice, with customer counts associated with each category.

The proposal for comment builds on this discussion but does away with the 19 days after invoice category for the reasons stated earlier in this section. Rather than attempting to define and align each Class A water utilities’ various accounting systems and tracking procedures in order to make such reporting of use, we are confident that a single arrearage amount (sufficiently aged) matched with the number of customers facing such arrearage, can yield more meaningful

information, especially combined with the new disaggregation described below in Section 5.

## **5. New Data To Track Payment Plans, Bill Payment Ratios, and External Funding Applied to Arrearages**

Water utilities have yet to be required to report on plans or arrangements offered or actualized to help customers manage their debt.<sup>23</sup> A key feature of the Water Shutoff Protection Act, the legislature expects a robust payment plan effort to minimize disconnections and support access and affordability of water service.

Stakeholders should comment on the newly proposed data disaggregation and methods to capture bill payment ratios described in this section.

Disaggregate the following currently reported elements:

- Overall arrearage amount
- Customers in arrears

The disaggregation should be into two categories: 1) formally engaged in a payment plan or arrangement, and 2) not engaged in any plan to manage their debt. This simple modification will give the Commission and stakeholders insight into the proportion of customers with “eligible arrears” engaged by the water utility to manage their debt. Furthermore, this modification will provide a comparison of average debt per customer between those with payment plans and those without.

Over several months, we will be able to observe for which customer groups, and for which utilities, the change in the average debt per customer is

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<sup>23</sup> Water utilities currently are required to report the number of customers requesting billing assistance, which is related to payment plans or arrangements.

going in the right direction (down).<sup>24</sup> Such tracking would support further consideration of water utility approaches to payment management and payment plans.<sup>25</sup> Comparing the average arrearages per customer of each group, would help answer questions such as 1) does the payment plan group reduce average arrears more than the group without plans, and 2) does the payment plan group improve water utility's ability-to-collect?

Another valuable data element to answer questions on affordability and ability-to-pay may be the ratio of the debt paid at the conclusion of either 1) the payment plan or 2) the failure of the payment plan (presumably at the disconnection.).

To report this value, the water utility would have to identify accounts with eligible arrears during a certain time period and identify a future time period to review these same accounts and again calculate average arrears upon resolution of arrears. The next data reporting working session will include discussion of these elements in the agenda. In comments, parties are directed to discuss in detail their recommendations for data that would capture bill payment ratio data.

With these additional data elements, the Commission and stakeholders will have more useful data on which to evaluate whether bill payment patterns are sustainable for low-income and all residential customers.

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<sup>24</sup> For example, compare Tables C-1 to C-2, and Tables C-3 to C-4, found in Attachment C to D.21-07-029. These tables allow for observation and evaluation of debt management outcomes between CAP and non-CAP customers. With an additional disaggregation of each table by customers and arrearages engaged in payment plans to those without, we would similarly observe and evaluate changes in average debt per customer.

<sup>25</sup>

## **6. Miscellaneous Standardization**

Some data elements or clarifications should be uniformly included to avoid misrepresenting impacts on water utilities and their customers. Stakeholders may comment on any or all of the following miscellaneous standardizations proposed here.

- Monthly reports submitted by the 15<sup>th</sup> of the month following the reporting month.
- Monthly reports clearly identify the “As-of” date of the data.
- Water utilities with more than one ratemaking area submit separate reports each ratemaking area. Water utilities may provide summary totals for the whole utility or confirm that the sum of reports for each ratemaking area equates to the totals for the whole utility.
- Water utilities separate reports for residential customers enrolled in Customer Assistance Program, residential customers not enrolled in CAP, and balance of company. Balance of company should include all non-residential accounts and may possibly include residential dwellings depending on how the water utility classifies and bills multi-unit residential dwellings
- If the “balance of company” category includes multi-unit residential dwellings, water utilities shall include a description of the reason the multi-unit residential dwellings are included in the “balance of company” category. Water utilities shall also estimate the proportion of “balance of company” arrearages attributable to residential dwellings, by any means reasonable for that company.
- Report monthly total customers in each grouping: by ratemaking area, and further by residential customers enrolled in CAP, residential customers not enrolled in CAP, and balance of company. Total customers in each grouping allows the percentage of affected customers to be more accurately derived. Currently total customer

numbers are only required to be reported in annual reports, and not necessarily broken down by ratemaking area and/or CAP customers. Reporting percentages of customers affected, in addition to the absolute number of customers affected, is necessary for evaluation purposes.

- Report monthly total billed revenue by each grouping: by ratemaking area, and further by residential customers enrolled in CAP, residential customers not enrolled in CAP, and balance of company. Total billed revenue in each grouping allows the percentage of revenue in arrears to be more accurately derived. Currently total billed revenue is only required to be reported in annual reports, and not necessarily broken down by ratemaking area and/or CAP customers. Reporting percentages of billed revenue in arrears, in addition to the absolute amount, is necessary for evaluation purposes.
- Number of customers disconnected for nonpayment shall exclude former (may also be termed “non-active” customers) who terminate service on their own initiative prior to accruing arrearages.

**IT IS RULED** that by no later than December 15, 2021, parties may comment on the proposed revisions to the required monthly data reporting by Class A water utilities, that are set forth in this ruling.

Dated November 24, 2021, at San Francisco, California.

/s/ CAMILLE WATTS-ZAGHA

Camille Watts-Zagha  
Administrative Law Judge

# **ATTACHMENT A**

Data reporting working session agendas.

## First Water Utility Data Reporting Working Session

August 25, 2021, 9:00 a.m. – 12:30 p.m.

**WebEx Link for View-and-Listen Internet Access:**

<https://cpuc.webex.com/cpuc/onstage/g.php?MTID=e4d6f4d4420bd9565cda82960d2e8c0cf>

**Passcode for View-and-Listen Internet Access:** 2021

**Event Number:** 146 086 1206

**Listen-only Audio Toll-Free Access:** 800-857-1917

**Passcode for Listen-only Audio Toll-Free Access:** 9836397#

Any disability-related accommodation or modification request to participate in the meeting should be directed to Stephen St Marie, 415-244-3168, [Stephen.st.marie@cpuc.ca.gov](mailto:Stephen.st.marie@cpuc.ca.gov).

### Updated Agenda

1. Welcome and Introductions
2. Basics of protocols for monthly reporting:
  - When to report: We hope to receive monthly reports by the 15<sup>th</sup> of the next month
  - Format: Excel spreadsheet
  - Electronic method:
    - Send spreadsheets as attachments – or
    - Send a link to spreadsheets on a server
3. Comparison between information reported to the SWRCB in the California Water and Wastewater Arrearage Payment Program Survey and information reported to the CPUC in monthly reporting in response to the ruling of June 2, 2020 and subsequent rulings.
4. Categories of lateness related to the “Number of customers late or behind on their bill”
  - <30 days from invoice: considered current
  - From Decision D.21-07-029, Attachment A: “All customer data to be provided by age of arrears over 60 days old, 90 days old, 150 days old”
5. Dealing with potential double-counting of customers in different categories of lateness. See Attachment A: “Number of customers (customer reported only once in the oldest of the three age buckets).”
6. Discussion of reporting on the “Number of customers requesting bill assistance,” as required in the June 2, 2020 ruling. How is that reporting to be coordinated with “Number of customers making partial payments,” also from the June 2, 2020, ruling, and the numbers of customers on arrearage management plans?
7. Monthly reporting of number of customers by district and type of customer

8. Priorities of Interested Parties/Stakeholders
9. Other topics from Attachment A that can be discussed today.
10. Review of How to Proceed with remaining topics included in Attachment A
11. Calendaring future water utility data reporting working sessions
12. Adjourn

The CPUC's Rules of Practice and Procedure, Rule 8.2 (a) states: "In any quasi-legislative proceeding, ex parte communications are allowed without restriction or reporting requirement." This meeting has been noticed to the service list of R.17-06-024, the Low-Income Water proceeding.



## Second Water Utility Data Reporting Working Session

Thursday, September 23, 2021, 9:00 a.m. – 12:30 p.m.

### WebEx Link for View-and-Listen Internet Access:

<https://cpuc.webex.com/cpuc/onstage/g.php?MTID=e4d6f4d4420bd9565cda82960d2e8c0cf>

**Event password:** 2021

**Event number:** 146 086 1206

**Toll-Free:** 855-282-6330

**Toll:** 415-655-0002

**Access Code:** 146 086 1206

Please note that the audio for this WebEx Event will be through WebEx. The above toll-free and toll numbers are provided for the convenience of anyone who needs to connect to the WebEx via telephone (versus a computer only).

Any disability-related accommodation or modification request to participate in the meeting should be directed to Stephen St Marie, 415-244-3168, [Stephen.st.marie@cpuc.ca.gov](mailto:Stephen.st.marie@cpuc.ca.gov).

## Preliminary Agenda

1. Welcome, Introductions, and Introductory Matters
  - August Data reported by Sep 15 – Thank you
  - Latest CPUC Staff Report on Arrearages
  - Reporting on OP 11 of D.21-07-029, “Number and percentage of customers disconnected for nonpayment and reconnected,”
2. Summary and Results and Recommendations from Working Session 1:
  - Status of Discussions Regarding Data Requirements of June 2, 2020, 2<sup>nd</sup> Amended Scoping Ruling
    - Q 1 Number of customers requesting billing assistance
    - Q 7 Range of arrearage amount
    - Q 6 Median arrearage amount
    - Q 5 Average arrearage amount
    - Q 9 Number of customers making partial payments
  - Categories of Lateness and SB-998. Suggesting two categories: “Late,” and “Late and Eligible.”
  - All Statistics – three categories of customers:
    - Residential CAP customers
    - Residential Non-CAP customers
    - Non-Residential customers (What about SWRCB category of Commercial Customers?)
3. Review of the final determinations of the SWRCB (Meeting of September 21 and 22) regarding the SWRCB Water and Wastewater Arrearage Payment Program.
  - Distinction between CPUC (Non-Residential) and SWRCB (Commercial). Does this matter?
  - Expectation for the Effects of SWRCB Bill Credits on CPUC reporting results
  - Expectation for other CPUC reporting that may be required
  - Draft SWRCB plan included Auto-Enrollment in Payment Programs – Connection with Q 9, “Partial Payments”
4. Future Meetings: October 27, December 1

## 5. Adjourn

The CPUC's Rules of Practice and Procedure, Rule 8.2 (a) states: "In any quasi-legislative proceeding, ex parte communications are allowed without restriction or reporting requirement." This meeting has been noticed to the service list of R.17-06-024, the Low-Income Water proceeding.

## Third Water Utility Data Reporting Working Session

**Correction: Wednesday, October 27, 2021, 9:00 a.m. – 12:30 p.m.**

### WebEx Link for View-and-Listen Internet Access:

<https://cpuc.webex.com/cpuc/onstage/g.php?MTID=e4d6f4d4420bd9565cda82960d2e8c0cf>

**Event password:** 2021

**Event number:** 146 086 1206

**Toll-Free:** 855-282-6330

**Toll:** 415-655-0002

**Access Code:** 146 086 1206

Please note that the audio for this WebEx Event will be through WebEx. The above toll-free and toll numbers are provided for the convenience of anyone who needs to connect to the WebEx via telephone (versus a computer only).

Any disability-related accommodation or modification request to participate in the meeting should be directed to Stephen St Marie, 415-244-3168, [Stephen.st.marie@cpuc.ca.gov](mailto:Stephen.st.marie@cpuc.ca.gov).

## Preliminary Agenda

1. Welcome, Introductions, and Introductory Matters
  - August Data reported by Oct 15 – Thank you
  - Latest CPUC Staff Report on Arrearages
  - Other
2. SWRCB Water and Wastewater Arrearage Payment Program
  - It is the CPUC's expectation that all companies should apply for the maximum amount for which they are eligible.
  - SWRCB arrearages through June 15. Arrearages have continued after that date.
  - How will statistics on arrearages be affected by customer credits?
3. Summary and Results and Recommendations from Working Session 2
  - Status of Discussions Regarding Data Requirements of June 2, 2020, 2<sup>nd</sup> Amended Scoping Ruling
  - Categories of Lateness and SB-998.
  - All Statistics – three categories of customers:
    - Residential CAP customers
    - Residential Non-CAP customers
    - Non-Residential customers (Balance of Company)
4. Reporting on Customers with Payment Programs
  - Internal Accounting – Discussion and Follow-up from September 23 meeting
  - Reporting to the CPUC: All arrearages and counts of customers with arrearages must be reported to the CPUC. Regardless of company internal accounting practices.
5. Tracking Customers That Have Benefitted from Programs
  - State Water Board (SWRCB) Water and Wastewater Arrearage Payment Program

- Community and Services Development (CSD) Low Income Household Water Assistance Program (LIHWAP)
  - CSD California Arrearage Payment Program (CAPP)
  - Housing and Community Development (HCD) Emergency Rental Assistance Program ERAP
6. Among the Non-Residential (Balance of Company) connections, how many are primarily residences, such as apartment buildings? A discussion
  7. Reporting on Disconnections: Status of Company Reporting.
  8. Future Meetings
    - December 1
    - Additional meetings as required
  9. Adjourn

The CPUC's Rules of Practice and Procedure, Rule 8.2 (a) states: "In any quasi-legislative proceeding, ex parte communications are allowed without restriction or reporting requirement." This meeting has been noticed to the service list of R.17-06-024, the Low-Income Water proceeding.

**(END OF ATTACHMENT A)**