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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

**ASSIGNED COMMISSIONER’S RULING
REVISING MONTHLY REPORTING REQUIREMENTS**

This ruling revises the monthly reporting requirements for Class A water utilities to require reporting specific to the use of special payment arrangements, a key feature of the 2018 Water Shutoff Protection Act. This ruling also standardizes certain definitions used by utilities in their regular reporting, eliminates other reporting requirements, and increases the frequency with which reporting on certain data points is required.

1. Background

The Commission began tracking the impacts of the COVID-19 pandemic on Class A water utilities and their customers in June 2020, during which time a statewide moratorium on water service disconnections was in effect.¹ As first

¹ The statewide moratorium on water service disconnections ended on December 31, 2021, and the Commission’s moratorium on Class A water service disconnections ended on January 31, 2022. The Commission required bi-weekly reporting from water utilities on

ordered by the Second Amended Scoping Memo in this proceeding, the Class A water utilities currently report monthly on a number of data points related to arrearages and disconnections.² These monthly reports provide information about the number of customers that are behind on their bills, how much those customers owe, and the numbers of customers on low-income customer rate assistance programs, referred to as Customer Assistance Program (CAP),³ among other items.

In Decision (D.) 21-07-029 and as a part of the Commission's ongoing efforts to address recovery from the COVID-19 pandemic, the Commission indicated an intention to carefully monitor the Class A water utilities' implementation of the protections established by the 2018 Water Shutoff Protection Act. As the Commission identified in D.21-07-029, a key feature of the 2018 Water Shutoff Protection Act is the requirement that water utilities provide flexible payment terms ("special payment arrangements")⁴ to address arrearages

COVID-19 impacts beginning in June 2020, though the reporting was required retroactively from January 2019. The frequency of required reporting was reduced to monthly in October 2020. Second Amended Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge Directing Comments to Consider Potential Commissioner Response to COVID-19 at 5.

² Second Amended Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge Directing Comments to Consider Potential Commissioner Response to COVID-19 at 4.

³ D.20-08-047, Ordering Paragraph (OP) 4.

⁴ CforAT/Leadership Counsel/NRDC/CWC/NCLC (Opening Comments at 4-5) request the Commission adopt a standard term for the multiplicity of terms currently in use such as payment plan, payment arrangement, deferred payment, special payment arrangement, *etc.* Our intention is to track implementation of the 2018 Water Shutoff Protection Act. In D.21-07-029, we employed the phrase "customers subject to special payment arrangements as defined in California Health and Safety Code Section 116910." At this point, the inaugural reporting of payment arrangements by Class A water utilities, we are less concerned about the nomenclature or even the features of arrangements, and more concerned about whether or not customers are responsive to the offers of payment flexibility, consistent with the intent of the

and ultimately to avert disconnections. However, existing monthly reporting requirements do not capture statistics on the numbers of customers using special payment arrangements or the effectiveness of special payment arrangements with regards to reducing debt and averting disconnection.

In order to prepare to capture the data necessary to monitor impacts on customers once disconnections resumed, in D.21-07-029 the Commission also established monthly data reporting working sessions,⁵ specifically highlighting the need for “reporting that reflects the age of arrearages aligned with the Water Shutoff Protection Act timelines,” “eliminating unused data elements from the required reporting,” and “more specific information about payment plans, bill payment ratios, and external funding applied to arrearages.”⁶

Four data reporting working sessions were held August 25, 2021, September 23, 2021, October 27, 2021, and December 1, 2021. To bring the discussions at the data reporting working sessions into the record, on November 24, 2021, I issued an Administrative Law Judge’s Ruling Seeking Comment on Revisions to Monthly Reporting Requirements (November 24, 2021 Ruling). Opening Comments were filed December 15, 2021, by San Gabriel Valley Water Company (San Gabriel Valley), California Water Service Company (Cal Water), California Water Association (CWA), Great Oaks Water Company (Great Oaks), the Public Advocates Office of the California Public Utilities Commission (Cal Advocates) and Center for Accessible Technology/Leadership

2018 Water Shutoff Protection Act. As a first step, we rely upon each Class A water utility to classify which of their offers to customers in debt fall into the category of “special payment arrangements” as defined in California Health and Safety Code Section 116910.

⁵ D.21-07-029 OP 12.

⁶ D.21-07-029 at 69-70.

Council for Justice and Accountability/Natural Resources Defense Council/Community Water Center/National Consumer Law Center (CforAT/Leadership Counsel/NRDC/CWC/NCLC). Reply comments were filed January 10, 2022, by Cal Water, Cal Advocates, CWA and CforAT/Leadership Counsel/NRDC/CWC/NCLC.

Finally, by the end of January 2022, the State Water Resources Control Board (State Water Board) reported allocating \$54.8 million to Class A water utilities to be applied to all customers' water utility bill outstanding debt.⁷ Compared to the outstanding customer debt reported by Class A water utilities in this proceeding at the end of December 2021 (\$89.8 million), the State Water Board allocation should resolve 60 percent of outstanding debt, leaving approximately \$35 million in customer debt across all the Class A water utilities.

2. Purpose of Revising Reporting on Arrearages

Some parties commenting on the November 24, 2021 Ruling requested that the Commission provide its rationale for requiring ongoing reporting requirements.⁸ The Commission's immediate need for continued, revised reporting requirements is the need to ensure customers retain access to essential water service. It has been two years since COVID-19 struck, and the disconnection moratorium for water customers ended on February 1, 2022. Thus, an update to reporting requirements is timely to determine whether the

⁷ The State of California's Water and Wastewater Arrearage Payment Program is described on the State Water Board website: https://www.waterboards.ca.gov/arrearage_payment_program/#:~:text=The%20funding%20will%20cover%20water,disbursed%20through%20January%2031%2C%202022.

Payments are also reported at: https://www.waterboards.ca.gov/arrearage_payment_program/docs/pmnt-status-arrearage.pdf.

⁸ See, e.g., CWA Opening Comments at 8; Great Oaks Opening Comments at 1.

additional protections put in place since reporting began are effective in preventing disconnections.

In the record of this proceeding, we assembled and published pre-pandemic rates of service disconnection, uncollectibles, and outstanding customer bills from data in annual reports. We utilized annual report data to standardize the presentation of rates of occurrences and degree of unpaid bills across companies, allowing that the data may be categorized and reported differently among different water utilities. Standardized data allows utilities and the Commission, in coordination with the State Water Board, to develop data-driven strategies to improve access to essential water service.

Throughout the pandemic, the currently required reporting has allowed the Commission and stakeholders to observe changes and determine the following:

- How did the pandemic change customers' ability to pay their water bills (compared to 2019)?
- How did the pandemic change water utilities' ability to collect revenue (compared to 2019)?
- How does the water utility bill relief distributed by the State of California's Water and Wastewater Arrearage Payment Program⁹ impact water utilities' revenue and customers' bills and arrearages?
- How are the numbers of customers behind on their bills changing, including how changes differ for customers on residential rates, on CAP rates, and for the remainder of customers?

⁹ The State of California's Water and Wastewater Arrearage Payment Program details, with payment updates, are available at the State Water Board's webpage at: https://www.waterboards.ca.gov/arrearage_payment_program/.

- How are the amounts owed by various customer groups changing?
- How do trends in arrearages and customers differ by utility?

The additional reporting we require today will continue to allow the Commission and stakeholders to answer these questions with more confidence in the data. Beyond technical and definitional refinements, however, this Ruling improves data reporting by requiring utilities to disaggregate reported totals by (1) totals associated with those formally engaged in the special payment arrangements offered in accordance with the 2018 Water Shutoff Protection Act; and (2) totals associated with those not taking advantage of the utilities' offers special payment arrangements. Such disaggregation will provide insight into the response of customers to the required offers of help, and the ability to see whether the offers of help make a dent in arrears compared to those customers without special payment arrangements. Specifically, the additional reporting requirements will allow the Commission and stakeholders to observe changes and determine the following:

- How many customers behind on their bills have taken advantage of their water utility's offer to manage their debt through a special payment arrangement?
- Are enrolled customers reducing their debt more quickly than, and avoiding disconnection more than, other customers in debt?
- Are water utilities recovering more past-due revenue from customers when they engage in special payment arrangements than otherwise?
- How do the dollar amounts of arrearages of customers engaged in special payment arrangements compare with those of customers without special payment arrangements to manage their water utility bill debt?

3. Summary of Reporting Refinements

This Ruling summarizes the data reporting requirements to which the May 2022 data should conform when reported by June 15, 2022. As shown below, the changes to current reporting include eliminating, condensing, or expanding the breakdowns of, or frequency of, existing data elements.

Expanding Existing Data Elements

As proposed in the November 24, 2021 Ruling, this Ruling expands current reporting requirements by requiring utilities to further break down certain data element totals by the amount of each total that is related to customers on special payment arrangements and the amount of each total related to customers not on special payment arrangements, as shown in subparts a) and b) for each applicable data element below.

Class A water utilities shall report the required data elements (1-9 and subparts, below) in the following three separate customer groupings

- single family residential enrolled in CAP;
 - *Cal-Am only: single family residential enrolled in Monterey Hardship;*
- single family residential not enrolled in CAP;
 - *Cal-Am only: single family residential not enrolled in either CAP or Monterey Hardship;*
- Balance of company, with an accompanying explanation of the tariffs under which the customers in this category are billed. May include any multi-unit tariff that is likely to include residential customers living in multi-unit dwellings that are billed under tariffs other than single-family residential tariffs (some water utilities may

have tariffs specific to residential customers in duplexes, condominiums, townhomes, or mixed-use buildings):¹⁰

1. Number of newly enrolled customers to your CAP; and
2. Number of overall enrolled customers in your CAP.
3. Number of customers with unpaid bills 79 days or more after invoice date, disaggregated by:
 - a. Number of customers formally engaged in any special payment arrangement; and
 - b. Number of customers not engaged in any special payment arrangement to manage their debt.
4. Dollar amount of unpaid bills 79 days or more after invoice date, disaggregated by:
 - a. Debt in any special payment arrangement; and
 - b. Debt not in any special payment arrangement.
5. Average dollar amount of unpaid bills 79 days or more after invoice date, disaggregated by:
 - a. Debt in any special payment arrangement; and
 - b. Debt not in any special payment arrangement.
6. Median dollar amount of unpaid bills 79 days or more after invoice date, disaggregated by:
 - a. Debt in any special payment arrangement; and
 - b. Debt not in any special payment arrangement.
7. Number of customers disconnected for nonpayment, further disaggregated by:
 - a. Customers engaged in any special payment arrangement;
 - b. Customers not engaged in any special payment arrangements;

¹⁰ Cal Water, San Gabriel Valley, and Liberty Utilities may continue reporting disaggregation of the required data elements by separate company or district.

- c. Dollars engaged in any special payment arrangement; and
 - d. Dollars not engaged in any special payment arrangements.
8. Number of customers reconnected after a disconnection for nonpayment, further disaggregated by:
 - a. Reconnected within 2 days of disconnection; and
 - b. Reconnected after 2 days of disconnection.
 9. Total billed water service revenues to be reported no less than quarterly.

Standardizing and Condensing Existing Data Elements

As proposed in the November 24, 2021 Ruling, this Ruling standardizes and condenses the reporting of arrearages to define arrearages as any amount that is unpaid 79 days or longer past the date of invoice, and to exclude customers no longer served by the water utility (terms for such customers include “former customers” or “non-active customers”) from the data. The definition of arrearages will apply to reporting the following existing data elements:

- Number of customers late or behind on their bill (in arrears);
- Average arrearage amount;
- Median arrearage amount; and
- Overall arrearage amount.

Eliminating Certain Existing Data Elements

As proposed in the November 24, 2021 Ruling, this Ruling eliminates reporting of the following data elements:

- Number of customers requesting bill assistance
- Range of arrearage amount
- Number of customers making partial payments

4. Discussion of Changes

4.1. New Reporting Element: Use and Effectiveness of Special Payment Arrangements

Parties provided mixed responses to the November 24, 2021 Ruling's proposal to disaggregate the "overall arrearage amount" and "customers in arrears" reporting elements into two categories: (1) formally engaged in any special payment arrangement; and (2) not engaged in any special payment arrangement to manage their debt. CforAT/Leadership Counsel/NRDC/CWC/NCLC "strongly support" the proposed disaggregation, noting that it will be "critically important for assessing the effectiveness of arrearage management[.]"¹¹ Great Oaks comments that the additional requirements are not needed, arguing that "utilities should be required to report on disconnections for non-payment and not payment plans."¹² Other parties did not comment on whether to adopt disaggregation requirements, but cautioned that the reporting could have limited usefulness for the Commission in making specific conclusions.¹³

This Ruling adopts and expands upon the reporting related to special payment arrangements proposed in the November 24, 2021 Ruling, requiring data points broken out into categories related to special payment arrangements (*i.e.*, subparts (a)-(b) for each applicable reporting requirement, as shown in Section 3, above). Specifically, this Ruling requires the single value for arrearages to be sorted by those receiving assistance or intervention, from those

¹¹ CforAT/Leadership Counsel/NRDC/CWC/NCLC Opening Comments at 1. *See also* Cal Advocates Opening Comments at 7.

¹² Great Oaks Opening Comments at 2-3.

¹³ CWA Opening Comments at 4; Cal Water Opening Comments at 3.

arrears that are simply accruing without intervention on the part of the water utility.

San Gabriel Valley identifies a problem they also raised in the working sessions; that their practice of establishing a new account for customers in debt who arrange special terms to resolve their debt, is no longer categorized by their system as a past-due amount.¹⁴ CWA asserts other water utilities may have the same practice.¹⁵ As necessary, Class A water utilities¹⁶ should make adjustments in order to comply with this reporting requirement. Without this change, the practice of reclassifying customers in debt thwarts the ability to compare progress of customers on special payment arrangements to progress of customers without special payment arrangements.

At this time, it will not be required to report on the ratios of debt paid at the conclusion of special arrangements as proposed in the November 24, 2021 Ruling. Cal Water argues debt ratios will be difficult to understand and prefers to assess impacts of other debt reduction strategies before collecting reporting this new metric,¹⁷ and San Gabriel Valley states its system cannot perform such a function.¹⁸ In contrast, CforAT/Leadership Counsel/NRDC/CWC/NCLC “strongly support reporting on bill payment ratios to inform how residential customers....are performing on payment plans each month.”¹⁹ CforAT/Leadership Counsel/NRDC/CWC/NCLC also recommend utilities report

¹⁴ San Gabriel Valley Opening Comments at 3.

¹⁵ CWA Opening Comments at 3-4.

¹⁶ See Section 5 scheduling an additional data working session.

¹⁷ Cal Water Opening Comments at 4-5.

¹⁸ San Gabriel Valley Opening Comments at 3-4.

¹⁹ CforAT/Leadership Counsel/NRDC/CWC/NCLC Reply Comments at 1-3.

characteristics of the variations in payment plans.²⁰ At this point, the new data elements of disaggregating customers in debt by those with/without special payment arrangements is prioritized over other adding more data elements.

The reporting ordered today directly aligns with the 2018 Water Shutoff Protection Act. Such alignment facilitates the Commission's oversight of the protections in the 2018 Water Shutoff Protection Act. The water utilities initially implemented the protections on February 1, 2020, simultaneously with the emergence of COVID-19 in California. Before the protections could take effect, California's moratorium on water service utility disconnections superseded the protections.

Throughout Phase 2 of this proceeding, Class A water utilities urged the Commission to rely upon the statewide protections rather than implementing additional protections. The Commission's D.21-07-029, deferring the resumption of disconnections until February 1, 2022, without further requirements, de facto relies upon the 2018 Water Shutoff Protection Act from this point further. These reporting requirements will communicate the effectiveness of an important protection: specialized payment arrangements. The resulting standardized reporting will allow for course corrections as necessary.

4.2. Condensed and Standardized Reporting Requirement: Definition of Arrearages as 79 Days Past Date of Invoice

CforAT/Leadership Counsel/NRDC/CWC/NCLC supports the November 24, 2021 Ruling's proposal to define arrearages as 79 days past the date of invoice, and to report a single dollar of arrearages rather than

²⁰ CforAT/Leadership Counsel/NRDC/CWC/NCLC Opening Comments at 2-3.

disaggregating by length of time of arrears.²¹ San Gabriel Valley, CWA and Cal Water and do not object in principle but cite difficulty in changing from their standardized age of arrears reporting of 30, 60 and 90 days to the new 79 days.²² Great Oaks objects on the basis that only data on arrearages resulting in disconnection is useful and any other arrearage data is not useful and burdensome.²³

This Ruling adopts 79 days as the standard here because the 2018 Water Shutoff Protection Act prohibits disconnection of water service until the water bill is 60 days overdue, and most water utilities allow 19 days from the date of invoice before categorizing the billed amount as overdue. Standardizing this term ensures that the Commission has an apples to apples comparison of the arrears amounts for each Class A utility. While data illustrating the age of the arrears may provide a picture of how quickly customers are able to bring their bills current, we intend to be circumspect in the amount of data required. In this case, we make a strategic choice to limit the counting of customers behind on their bills and the amount of their arrearages to one single time frame (any amount at least 79 days after invoice).

While we eliminate the requirement that utilities disaggregate the ages of the arrears, we capture the treatment of arrearages by requiring specification as to the amounts held in arrears by those on special payment arrangements as described in Section 4.1 New Reporting Element: Use and Effectiveness of

²¹ CforAT/Leadership Counsel/NRDC/CWC/NCLC Opening Comments at 1-2. Cal Advocates (Opening Comments at 5) supports reporting arrearages over 79 days but did not support a single value, instead recommending two age categories.

²² Cal Water Opening Comments at 6-7, CWA at 2-3.

²³ Great Oaks Opening Comments at 4.

Special Payment Arrangements. Over time this new reporting requirement will provide streamlined and effective information regarding the ability of customers to bring their accounts up to date.

**4.3. Increased Frequency of Reporting
Element: Total Billed Revenues**

In order to improve the usefulness of data reported related to revenue, this Ruling also requires the Class A water utilities to increase the frequency of reporting water service revenues billed from annually to no less than quarterly.

Several parties commented on the temporal difference between reporting billed revenue monthly and reporting of customer arrearages, and some assert reporting billed revenues is unworkable.²⁴ In response this Ruling makes several modifications to the proposal in the Ruling. This Ruling requires at least quarterly, rather than monthly, reporting of billed revenues. Each water utility may consider which frequency is most reasonable to approximate and report billed revenues. Some utilities may prefer to report monthly, others every two months (in the event their billing cycle is every two months), and others quarterly (to limit the frequency). The Commission understands that reporting of revenues cannot be precise due to the varied billing cycles, and some degree of estimation and/or averaging may be necessary. Nevertheless, to understand the degree of arrearages, and standardize the dollar amount, it is necessary to be able to calculate the arrearages relative to approximate total billed revenue. Currently, the annual reporting of revenues is not frequent enough to reflect percentage changes of the proportion of that revenue collected throughout the year.

²⁴ Cal Water Opening Comments at 6-7, CWA Opening Comments at 7, CforAT/Leadership Counsel/NRDC/CWC/NCLC Reply Comments at 6.

4.4. Eliminated Data Reporting Elements

Parties generally supported the Ruling's proposal to eliminate the following reporting requirements:²⁵

- Number of customers requesting bill assistance;
- Range of arrearage amount; and
- Number of customers making partial payments²⁶

The November 24, 2021 Ruling reasoned, and several parties agreed, that requirements to report "the number of customers requesting bill assistance" and "the number of customers making partial payments" were variously understood by the different water companies and no longer useful to Commission staff.²⁷

Regarding the number of customers requesting bill assistance, Cal Advocates, however, argued for better definition rather than elimination. Cal Advocates asserts this data element would show whether customers are being rejected when requesting bill assistance. The Commission has two years of experience with collecting this data element and making it publicly available, yet no party has made use of it. Replacing this data element with the new reporting of customers in debt by those with/without special payment arrangements indicates how easily water utilities make special payment arrangements available to customers in debt, and assumes that water utilities are indeed complying with their tariffs updated in compliance with the 2018 Water Shutoff Protection Act to give customers as much flexibility as possible if the customer is willing to address their debt.

²⁵ November 24, 2021 Ruling at 7.

²⁶ D.21-07-029 at 65.

²⁷ November 24, 2021 Ruling at 7. *See* CforAT/Leadership Counsel/NRDC/CWC/NCLC – Opening Comments at 1, Cal Water Opening Comments at 2, San Gabriel Water at 2-3.

Cal Advocates further recommended that the requirement that utilities report the number of customers making partial payments be retained to “determine whether the payment plans are structured in ways that ensure customers are able to pay their monthly bill and the monthly portion of their arrearage in full.”²⁸ However, reporting the number of customers in special payment plans that are ultimately disconnected provides similar information to the Commission and keeps the scope of reporting manageable for the utilities and staff.

The November 24, 2021 Ruling reasoned and several parties agreed that the range of arrearage amount should no longer be required. The highest arrearage amount reported tends to capture outliers, rather than represent bill payment difficulty. This Ruling continues reporting the median and average arrearage data elements, as such elements are more suited to capturing and representing degrees of bill payment difficulty.

4.5. Reporting on State Water Board Arrearage Relief and Disconnections

Several parties recommend the Commission require reporting of payments of the California Water and Wastewater Payment Relief Program described in the Background section, *supra*.²⁹ Additionally, several water utilities and CWA comment how it is unnecessary to track disconnections for nonpayment during a disconnection moratorium.³⁰ Both issues are moot.

²⁸ Cal Advocates Opening Comments at 7.

²⁹ CforAT/Leadership Counsel/NRDC/CWC/NCLC Opening Comments at 3-4 and Cal Advocates Opening Comments at 3.

³⁰ Great Oaks Opening Comments at 3, 5 and CWA Opening Comments at 4.

The State Water Board provides a comprehensive accounting of the arrearage relief payments on its website, obviating the need for reporting on the same items here. Furthermore, the disconnection moratorium has ended. Uninterrupted access to water service in the home remains critically important. The arrearage amounts portend some number of disconnections even once state relief and the 2018 Water Shutoff Protection Act rules are applied. Monitoring the occurrence of disconnections should not be controversial.

4.6. Reporting Data Disaggregated by Customer Groups and Classes, and Ratemaking Districts

Party responses to the November 24, 2021 Ruling's proposal for new customer groupings to reflect multi-unit residential customer accounts and a break-out of statistics by ratemaking areas are mixed. Cal Advocates and CforAT/Leadership Counsel/NRDC/CWC/NCLC support the proposal.³¹ Cal Water voluntarily reports by ratemaking area but points out that requiring so much data is only useful to the extent the Commission can handle such volume of data, which is not currently possible.³² I decline to require data to be disaggregated by these categories at this time to keep the scope of reporting manageable. Including these additional breakdowns now would expand the total number of data elements reported monthly from 290 to 3,249. The additional breakdowns by payment arrangement are the highest priority currently as they are in accordance with the directives of the 2018 Water Shutoff Protection Act and so this Ruling prioritizes those reporting changes by limiting expansion of requirements in other areas.

³¹ Cal Advocates Opening Comments at 6 and CforAT/Leadership Counsel/NRDC/CWC/NCLC Opening Comments at 4 and Reply Comments at 3.

³² Cal Water Opening Comments at 7.

This determination is without prejudice for future consideration of such additional disaggregation. In determining not to require breakdowns by ratemaking district nor multi-family tariffs now, we acknowledge such disaggregation would potentially answer questions such as: (1) whether owners of residential multi-unit buildings have difficulty paying their water bills; (2) how nonresidential accounts contribute to the arrearage problem; and (3) which Class A water utilities separately track payment challenges of their residential multi-unit buildings. However, as noted above, at this time limiting additional data reporting requirements in favor of those prioritized is reasonable.

5. Timing and Additional Data Working Session

This ruling directs Class A water utilities to begin the new reporting in their May reports to be filed June 15, 2022. To create continuity between the data collected since the start of the COVID-19 pandemic and the revised data, this ruling does not eliminate the current reporting simultaneously with the beginning of the new reporting. Rather, for a three-month transition period, Class A water utilities will continue to file two sets of reports to allow for a transition and to create a crosswalk, or relationship, between the data that has been reported until now. Class A water utilities will cease their current reporting after filing two sets of July reports by August 15, 2022.

CWA requests 90 days for water utilities to implement the new reporting requirements. Because the technical difficulties raised appear limited to a few utilities and to a few data elements, and because water utilities have been engaging in discussion of potential refinements for many months, rather than delay the new reporting for 90 days, individual water utilities may note on their reporting of newly required elements any inability to comply with these requirements in the next report and indicate their expected date of compliance,

not to exceed 90 days. In response to party requests to confirm and coordinate the transition to the new reporting,³³ we schedule another data reporting working session for June 2022. Water utilities may elaborate on any technical barriers to compliance during the additional working session.

IT IS RULED that:

1. Beginning with reports of August 2022, to be filed no later than September 15, 2022, Class A water utilities shall eliminate reporting of:
 - Number of customers requesting bill assistance;
 - Range of arrearage amount; and
 - Number of customers making partial payments.
2. Beginning with reports of May 2022, to be filed no later than June 15, 2022, Class A water utilities shall define arrears and arrearages as unpaid bill amounts 79 days or beyond the date of invoice.
3. Beginning with reports of May 2022, to be filed no later than June 15, 2022, Class A water utilities shall report all data elements disaggregated by the following customer groupings:
 - single family residential enrolled in the Customer Assistance Program (CAP);
 - *Cal-Am only: single family residential enrolled in Monterey Hardship;*
 - single family residential not enrolled in CAP;
 - *Cal-Am only: single family residential not enrolled in either CAP or Monterey Hardship; and*
 - Balance of company, with an accompanying explanation of the tariffs under which the customers in this category are billed. May include residential customers in multi-unit

³³ Cal Water Opening Comments at 7, CforAT/Leadership Counsel/NRDC/CWC/NCLC Reply Comments at 1.

dwellings, commercial, industrial, fire districts, or other special district.

4. Beginning with reports of May 2022, to be filed no later than June 15, 2022,

Class A water utilities will report the following data elements monthly:

1. Number of newly enrolled customers to your Customer Assistance Program (CAP);
2. Number of overall enrolled customers in your CAP;
3. Number of customers with unpaid bills 79 days or more after invoice date, disaggregated by:
 - a. Number of customers formally engaged in any special payment arrangement; and
 - b. Number of customers not engaged in any special payment arrangement to manage their debt.
4. Dollar amount of unpaid bills 79 days or more after invoice date, disaggregated by:
 - a. Debt in any special payment arrangement; and
 - b. Debt not in any special payment arrangement.
5. Average dollar amount of unpaid bills 79 days or more after invoice date, disaggregated by:
 - a. Debt in any special payment arrangement; and
 - b. Debt not in any special payment arrangement.
6. Median dollar amount of unpaid bills 79 days or more after invoice date, disaggregated by:
 - a. Debt in any payment arrangement; and
 - b. Debt not in any special payment arrangement.
7. Number of customers disconnected for nonpayment, further disaggregated by:
 - a. Customers engaged in any special payment arrangement; and
 - b. Customers not engaged in any special payment arrangement.

8. Number of customers reconnected after a disconnection for nonpayment, further disaggregated by:
 - a. Customers engaged in any special payment arrangement;
 - b. Customers not engaged in any special payment arrangements;
 - c. Dollars engaged in any special arrangement; and
 - d. Dollars not engaged in any special payment arrangements.
9. Number of customers reconnected after a disconnection for nonpayment, further disaggregated by:
 - a. Reconnected within 2 days of disconnection; and
 - b. Reconnected after 2 days of disconnection.
5. Beginning with reports of May 2022, to be filed no later than June 15, 2022, Class A water utilities will report the following data elements no less than quarterly:
 - Total billed revenues.
6. The Water Division will host a data working session to coordinate refinements directed in this ruling in June 2022.

Dated April 28, 2022, at Sacramento, California.

/s/ DARCIE L. HOUCK

Darcie L. Houck
Assigned Commissioner