March 17, 2020  
VIA E-MAIL

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SUBJECT: Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency

I write to you in response to Governor Gavin Newsom’s proclamation of a state of emergency in California due to the spread of COVID-19. This letter serves as notification that the California Public Utilities Commission (CPUC) plans to take action to provide emergency customer protection measures for customers in California to prevent disconnections for unpaid bills during the pendency of the
emergency. You should act on the customer protections measures described in
this letter immediately; the CPUC will vote to ratify these measures in the near
future.

On March 4, 2020, Governor Newsom declared a State of Emergency in
California related to COVID-19. On March 12, 2020, Governor Newsom issued a
new Executive Order\(^1\) recognizing that individuals exposed to COVID-19 may be
unable to report to work due to illness or quarantines, and ordering numerous
measures including social distancing. On March 16, 2020, Governor Newsom
issued an Executive Order\(^2\) requesting that the CPUC monitor the measures
undertaken by public and private utility providers to implement customer service
protections in response to COVID-19.

It is clear that the response to COVID-19 will be extremely disruptive to all
Californians and will impact many Californians' ability to work. We have dealt
with highly disruptive events in the recent past, with the devastating wildfires in
Northern and Southern California. In response, the CPUC adopted a series of
requirements for utility companies (electric, gas, water, sewer) and
communications providers, culminating in customer protections measures
adopted in two decisions (D.)19-07-015 and D.19-08-025. These customer
protection measures apply in cases where the declared emergency relates to
the disruption of service or to the degradation of service.

COVID-19 has not resulted in the same disruptions or degradations to utility
service in California as the recent wildfires. We expect that utility services will
remain reliable and assist in California's COVID-19 response by allowing more
people to safely self-quarantine or telework. Despite the differences in the
cause of the emergencies, the customer protections adopted in D.19-07-015
and D.19-08-025, which include moratoriums on disconnections, can mitigate
some of the disruptions to Californians' daily lives related to the COVID-19
response – especially those Californians who are economically vulnerable. In
response to COVID-19, some utilities and service providers have already
announced voluntary moratoriums on service disconnections for non-payment.

Because of the seriousness of the situation, we expect the utilities and service
providers subject to D.19-07-015 and D.19-08-025 to extend the same applicable
customer protections directed in D.19-07-015 and D.19-08-025 to customers in
response to the declared state of emergency due to the spread of COVID-19.
We also expect the utilities and service providers to report to the CPUC on all


\(^2\) Executive Order N-28-20, available at [https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-
Order.pdf](https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf)
customer protection measures they implement in response to COVID-19 as soon as they are implemented, so that the CPUC may publicly report on these measures. These customer protections should be retroactively applied to March 4, 2020.

Subject to CPUC action to ratify this direction, the utilities and service providers will be expected to file an advice letter reporting compliance with implementing the mandated customer protections.

Sincerely,

Alice Stebbins
Executive Director

CC: President Marybel Batjer, CPUC
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    Commissioner Liane Randolph, CPUC
    Commissioner Clifford Rechtschaffen, CPUC
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    Service List to R.18-03-011