



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



April 15, 2021

Via E-Mail Only

California Public Utilities Commission
Energy Division, Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298

**ADVICE LETTER 60-G-A Supplemental
(Alpine Natural Gas Operating Company No. 1, LLC U909-G)**

Subject: Supplemental Advice Letter 60-G-A to Alpine Natural Gas Operating Company No. 1, LLC (U-909-G)-Advice Letter No. 60-G Transition Plan for Expiration of COVID-19 Emergency Customer Protection Measures Pursuant to Resolution M-4849.

Purpose

Pursuant to Ordering Paragraph (“OP”) 5 of Resolution M-4849, *Authorization and Order Directing Utilities to File Transition Plans for the Expiration of the Emergency Customer Protections*, Alpine Natural Gas Operating Company No. 1, LLC (“Alpine”) submitted Tier 2 Advice Letter 60-G on April 1, 2021 to the California Public Utilities Commission (“Commission”) to implement its transition plan for the expiration of the COVID-19 Emergency Customer Protection Measures. In accordance with direction from the Commission, Alpine submits this Supplemental Advice Letter to:

- Update “Section A – Activities Timeline, COVID-19 Impacted Customers” and “Section B – ME&O Strategy” under the Discussion Section in the original Advice Letter 60-G to address that Alpine will provide information to customers regarding utility bill assistance programs that may be available to customers; and
- Add “Section E – Low Income Oversight Board Recommendations” under the Discussion to address the Low Income Oversight Board recommendation that Alpine will implement in its transition plan.

This Supplemental Advice Letter replaces in its entirety Advice Letter 60-G, which was submitted by Alpine on April 1, 2021.

Background

On March 4, 2020, Governor Gavin Newsom declared a State of Emergency¹ in California as part of the state’s response to address the global outbreak of COVID-19. On March 16, 2020,

¹ Available at <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

Governor Newsom issued Executive Order N-28-20,² requesting that the Commission monitor the measures by public and private utility providers to implement customer service protections in response to COVID-19.

On March 17, 2020, Commission Executive Director Alice Stebbins directed utilities to extend the “applicable customer protections directed in Decision (“D.”) 19-07-015 to customers in response to the COVID-19 pandemic, to submit Tier 1 advice letters implementing the applicable emergency disaster relief program (“EDRP”) customer protections set forth in D.19-07-015 and to apply such protections retroactively to March 4, 2020, when the State of Emergency was declared.

On March 25, 2020, in accordance with OP 1 of D.19-07-015 and the Commission Executive Director’s March 17, 2020 letter, Alpine submitted Tier 1 Advice Letter 54-G to notify the Commission that Alpine was implementing applicable portions of its EDRP for customers impacted by the COVID-19 pandemic.

On April 16, 2020, the Commission adopted Resolution M-4842 directing utilities to offer the protections adopted in D.19-07-015 to all residential and small business customers through April 16, 2021, with an option to extend that date.³ OP 2 of Resolution M-4842 directed utilities to file a Tier 2 Advice Letter describing all reasonable and necessary actions to implement the emergency customer protections adopted in D.19-07-015 to support California customers.

As directed, on July 31, 2020 Alpine filed a Supplemental Tier 2 Advice Letter 54-G-A establishing its EDRP and implementing the applicable customer protections contained in D.19-07-015 and Resolution M-4842 through April 16, 2021. Additionally, Alpine’s Supplemental Tier 2 Advice Letter 54-G-A established a COVID-19 Pandemic Protections Memorandum Account (“CPPMA”) to track and record expenses and lost revenues associated with its implementation of the COVID-19 EDRP customer protections. Alpine’s Supplemental Advice Letter 54-G-A was approved by the Commission on October 21, 2020, with an effective date of March 4, 2020.

On February 12, 2021 the Commission issued Resolution M-4849 ordering the utilities to extend the customer protections for residential and small business customers through June 30, 2021. Resolution M-4849, among other things, directed utilities to file a Tier 1 Advice Letter describing all reasonable and necessary actions to extend the EDRP customer protections contained in Resolution M-4849 to support California customers through June 30, 2021. As directed, on February 22, 2021 Alpine filed Tier 1 Advice Letter 59-G requesting approval from the Commission to extend the EDRP customer protections in Resolution M-4849 through June 30, 2021, and the Commission accepted Alpine’s Advice Letter 59-G on February 24, 2021, with an effective date of February 22, 2021. As such, Alpine’s EDRP customer protections are set to expire on June 30, 2021, unless otherwise extended.

In an effort to assist customers with the transition following expiration of the COVID-19 EDRP customer protections on June 30, 2021, Resolution M-4839 also directed utilities to file a Tier 2 Advice Letter by April 1, 2021 documenting the transition plans for the expiration of the customer protections. Alpine submitted the Tier 2 Advice Letter 60-G to document its transition plan on April 1, 2021, and submits this Supplemental Advice Letter 60-G-A to address inadvertent deficiencies in the original Advice Letter 60-G.

² Available at <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf>.

³ Resolution M-4842, p.4.

Discussion

Resolution M-4849 OP 5 provides that the transition plan for the expiration of the COVID-19 EDRP customer protections include the following information:

1. A timeline of new start and resumed activities
2. A marketing, education and outreach (“ME&O”) strategy
3. An explanation of the activities timeline and ME&O strategy accounts for compliance and safety
4. A progress tracking and reporting plan

A. Activities Timeline

Date	Activity
May 1, 2021	First notification regarding July 1, 2021 expiration of COVID-19 EDRP customer protections and how to request to enroll in a payment plan if a customer continues to be impacted by COVID-19; sent to all Alpine customers
June 1, 2021	Second notification regarding July 1, 2021 expiration of COVID-19 EDRP customer protections and how to request to enroll in a payment plan if a customer continues to be impacted by COVID-19; sent to all customers with a delinquent balance greater than thirty (30) days
July 1, 2021	COVID-19 EDRP customer protections cease
July 10, 2021	Resumption of service disconnections for non-payment ⁴
August 1, 2021	Alpine to re-start any resumption of service fees
December 1, 2021	CARE recertification and income verification (audit) resumes

Automatic Deferred Payment Plan: Alpine will automatically put customers on a six (6) month deferred payment plan starting on July 1, 2021 and ending January 1, 2022 if such customer meets the following requirements: 90+ days past due bill and more than \$250 in arrears.

COVID-19 Impacted Customers:

- Through December 31, 2021, Alpine will continue to waive resumption of service fee requirements and will not disconnect a customer if they inform Alpine that they are impacted by COVID-19.
- Alpine will work with customers on developing a deferred payment plan suitable for their needs if they inform Alpine that they are impacted by COVID-19, and will provide customers with information regarding utility payment assistance programs that may be available.

B. ME&O Strategy

- All customers will be notified via Alpine’s website, US mail, and over the phone via customer service communication that the COVID-19 EDRP customer protections will end on July 1, 2021.

⁴ Alpine customers will receive a 15-day advance notice if the bill is not paid by the 10th of the month.

- All customers with a delinquent balance greater than 30 days will receive a second notification via US Mail that the COVID-19 EDRP customer protections will end on July 1, 2021.
- A notification that service disconnections for nonpayment will resume on July 10, 2021 will be provided in all communications.
- A notification that resumption of services fees will resume on August 1, 2021 will be provided in all communications.
- Commencing May 1, 2021, Alpine’s website will include information regarding the customer transition plan timeline.
- Commencing May 1, 2021, Alpine’s website and all communications via mail will include information on how to inform Alpine if they continue to be impacted by COVID-19 how to request to enroll in a payment plan.
- Commencing May 1, 2021, Alpine’s website and all communications via mail discussed herein will include information regarding programs that may be available to assist customers in managing their utility bill payments, including:
 - The Amador-Tuolumne Community Action Agency, the local administrator of the Federal Low-Income Home Energy Assistance Program (“LIHEAP”) in Alpine’s territory, which offers, among other things, utility payment assistance for eligible customers.
 - California’s COVID-19 Tenant Relief Act (Senate Bill 91), which may provide relief for customers with utility bill arrearages, subject to funding availability and eligibility.

C. Compliance and Safety

Alpine’s activities timeline and ME&O strategy provided in Section A and B above account for compliance and safety measures by ensuring that Alpine’s most vulnerable customers maintain access to Alpine’s services.

Of Alpine’s 1,688 residential and small business customers, 37 residential customers have accounts over 90+ days past due, and 5 of those residential customers are enrolled in the CARE Program. Of the 37 residential customers with accounts over 90+ days past due, 10 of those customers have a past due balance of \$250 or greater.

	Customer Totals	Accounts over 90 Days Past Due / Percent of Applicable Customers	Accounts 90 Days Past Due and \$250 Balance or Greater / Percent of Applicable Customers
Residential Customers	1,662	37 / 2.23%	10 / 0.60%
Small Business Customers	26	0 / 0.00%	0 / 0.00%
Customers Enrolled in CARE Program	154	5 / 3.35%	

Alpine’s activities timeline is designed to provide an automatic transition into a six (6) month payment plan for those customers that have a 90+ day past due balance of \$250 or more. This automatic transition would apply to any customers that are enrolled in the CARE Program that meet this threshold to ensure that these customers are not denied access to service. Additionally, for those customers that advise Alpine that they are impacted by the COVID-19 Pandemic, Alpine work with those customers to develop individualized payment plans as necessary, and through December 31, 2021, will continue to waive any resumption of service fees and will not disconnect any such customers for nonpayment.

Alpine's ME&O strategy utilizes all of Alpine customer communications channels to ensure that all customers are aware of the transition plan after the expiration of the EDRP customer protections. More importantly, Alpine will take special care to send a second individual notice to customers that have a delinquent balance for 30+ days or more.

Lastly, as a small, single source gas utility, Alpine's customer base has a greater demand for Alpine's services in the fall and winter seasons in order to provide heat to customers' homes, and during the summer season customer gas consumption is very low. The expiration of the EDRP customer protections occurs in the middle of the summer season. Thus, should any disconnections of service occur in accordance with the timeline provided, the impact to customer safety will be minimal, and Alpine has designed its activities timeline and ME&O strategy to further mitigate any potential affects to customer safety by providing advance notice and ample opportunity for customers to seek reasonable assistance from Alpine as necessary.

D. Progress Tracking and Reporting Plan

Alpine does not currently have any customers on payment plans. Starting July 1, 2021, Alpine will track the following metrics on a monthly basis:

- Number of customers enrolled in payment plans for arrearages
- Dollar amount of payments made pursuant to a payment plan and remaining balance for unique customers enrolled in payment plans.
- Number of customers enrolled in payment plans for arrearages and number enrolled as a percentage of total customers eligible for payment plans

E. LIOB Recommendations

While most of the LIOB recommendations were directed to the Commission, Alpine is able to implement the following recommendation in its transition plan:

The LIOB recommends that all transition plans include a 7-day or 168 hour-look-ahead period, where if temperatures are forecasted to be above 100 degrees or below 32 degrees, the household shall not be disconnected. The LIOB requests this to be in effect through December 31, 2021.

Through December 31, 2021, Alpine will implement this 7-day look-ahead period and will not disconnect customers' access to service if temperatures are forecasted to be above 100 degrees or below 32 degrees.

Compliance

This Tier 2 Advice Letter requests approval in compliance with Resolution M-4849.

Effective Date

Alpine requests that this Tier 2 Advice Letter become effective April 1, 2021, the date of the original Advice Letter 60-G.

Protests

Alpine requests that the Commission, pursuant to General Order 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice Letter 60-G and not reopen the protest period.

A protest must be mailed within twenty (20) days of the date the Commission accepts this Tier 2 Advice Letter for filing. The calendar is available on the Commission's website (www.cpuc.ca.gov). There are no restrictions on who may submit a protest, but the protest shall set forth the grounds upon which it is based, the effect that approval of the advice letter might have on the protestant, and the reasons the protestant believes the advice letter, or a part of it, is not justified, and shall be submitted expeditiously. If the protest requests an evidentiary hearing, the protest must state the facts the protestant would present at an evidentiary hearing to support its request for whole or partial denial of the advice letter.

Protests should be mailed to:

California Public Utilities Commission
Energy Division, Tariff Unit
505 Van Ness Avenue, 4th Floor San Francisco, CA 94102-3298 Facsimile: (415)
703-2200 Email: edtariffunit@cpuc.ca.gov

The protest should be sent via email and U.S. Mail (and by facsimile, if possible) to Alpine at the address shown below on the same date it is mailed or delivered to the Commission:

Michael Lamond, CFO/Administrator
Alpine Natural Gas Operating Company No. 1, LLC
P.O. Box 550
Valley Springs, CA 95252

Notice and Service

In accordance with Resolution M-4849 OP 5, a copy of this Tier 2 Advice Letter is being sent electronically to parties on the R.18-03-011, A. 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014 proceeding service lists. During the COVID-19 pandemic, Alpine can only provide electronic copies of this advice letter to the service list.

If additional information is required, please do not hesitate to contact me. Respectfully submitted, Alpine Natural Gas Operating Company No. 1, LLC.

/s/ Michael Lamond

Michael Lamond, CFO
Alpine Natural Gas Operating Company No. 1, LLC
mike@alpinenaturalgas.com

cc: Service Lists detailed above