

Paradise Irrigation District

AGENDA

PARADISE IRRIGATION DISTRICT AD HOC CUSTOMER RECOVERY SUPPORT COMMITTEE 6332 CLARK ROAD, PARADISE, CA 95969

MONDAY, APRIL 19, 2021 ~ 9:00 AM

Committee Members: Directors Shelby Boston and Brian Shaw

PID Staff - Tom Lando, Mickey Rich

Public Members - Lee Brown, Cliff Jacobson, Chris Rehmann

Special Notice:

Pursuant to California Governor Gavin Newsom's Executive Order N-29-20 issued on March 17, 2020, relating to the convening of public meetings in response to the COVID-19 pandemic, the Paradise Irrigation District Board of Director and Committee Meetings will be closed to the public and all non-essential District staff.

Public comment will be accepted via email with the subject line, PUBLIC COMMENT ITEM NO. _____ to gborrayo@paradiseirrigation.com by 8:30 a.m. on the day of the meeting and comments will be submitted to the Committee.

AGENDA:

- 1. Opening
- 2. Public Participation
- 3. Discontinuance Policy Chapter 7.73 of PID Policy & Procedures: Review and consider options relating to proposed revisions to the current Discontinued Service Policy.
- 4. Open Discussion This is an opportunity for committee members to bring up any new topics or issues.
- 5. Consider Establishing Future Meeting Date (A meeting date of Thursday, May 13, 2021 at 3:00 p.m. scheduled at the March 26th committee meeting).
- 6. Adjournment



PARADISE IRRIGATION DISTRICT

"Paradise Irrigation District (PID) is dedicated to the business of producing and delivering a safe, dependable supply of quality water in an efficient, cost effective manner with service that meets or exceeds the expectation of our customers."

DATE: March 30, 2021

TO: PID Board of Directors

FROM: Tom Lando, Interim District Manager

Mickey Rich, Temporary Assistant District Manager

RE: Reconsider Revision to Policy & Procedures, Chapter 7.7.3 Discontinued

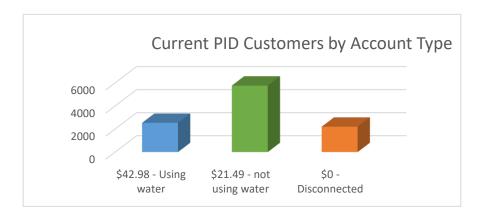
Service

This policy change does not affect customers who currently pay a monthly water bill for their property.

We hear the community's concerns about potential costly fees to reconnect their water service and are dedicated to presenting options that will cover the costs of the District but do not create an obstacle to receiving water.

Expiring Policy: Directly after the 2018 Camp Fire, the Board voted to temporarily amend the disconnect policy to include a maximum cost to reconnect of \$500.00 based on labor, equipment, and material cost to reconnect which would expire December 31, 2020. The Board extended the policy through March 31, 2021. To date, approximately 2300 customers have disconnected their service. For those who reconnect, the current cost can be well below the \$500.00 maximum.

Meanwhile, there are approximately 5700 customers who have not disconnected, are not actively using water and continue to pay into the system. The District received two years backfill funding from the State but is unlikely to receive a third year.



Recent Policy: The board changed the policy on March 17, 2021 to not retain capacity for disconnected accounts which would mean a customer returning to the district would be subject to the same costs, policies, and procedures as a new connect.

The policy contains a "safety net" for three-years from date of original disconnect that would allow a property owner to resume water service by paying the deferred \$21.49 monthly maintenance fees (Maximum of \$773.64) with interest. This reconnect would be subject to an engineering review confirming there were no additional upgrades required to service the property.

Possible Options:

- 1. Keep the current policy and seek grant funding to assist customers in resuming water service.
- 2. Change the policy to include a maximum reconnect charge of \$750.00 or other amount within the three years or other length of time.
- 3. Pursue adding the system maintenance fee as an annual assessment.
- 4. Leave the 2018 policy in place and look for more positive incentives for our current customers.

CHAPTER 7 WATER RATES, OPERATING FEES AND BILLING PROCEDURES

7.1 WATER RATES

A current schedule of prevailing water rates, service charges, and operating fees shall be determined and approved by the Board and shall be available upon request at the District office. A current schedule of these rates, charges, and fees shall be included in Appendix A.1 of this manual.

7.2 PUBLIC NOTIFICATION OF WATER RATE CHANGES

Revisions to water rates, service charges, and operating fees shall normally be established as required through the public hearing process. To the extent possible, water rate changes will become effective with the next billing date which will be at least thirty (30) days following the date on which the Board approved the rate change. The District will endeavor to make public notification of the rate changes through the news media and on customer water bills, space permitting. Emergency rate changes may become effective at the discretion of the Board.

7.3 SERVICE CALL CHARGE

A charge may occur for each service call where it is done for the convenience of the user or made necessary through non-payment of charges or to enforce the rules of the District. A current schedule of these rates, charges, and fees shall be included in Appendix A.1 of this manual.

7.4 DUPLICATE BILLING CHARGE

At landowner's request, the District will send a duplicate billing to a second address (this does not change the landowner's responsibility for meter charges). A charge for this service will be added to the bill. A current schedule of these rates, charges, and fees shall be included in Appendix A.1 of this manual.

7.5 SPECIAL METER READING CHARGE

A charge shall be made for any special reading requested by the owner. A current schedule of these rates, charges, and fees shall be included in Appendix A.1 of this manual.

7.6 EXAMINATION OF METERS CHARGE

Upon executing an application and depositing an inspection fee, any customer may request that his meter be examined and tested to determine its accuracy. The inspection fee shall be fixed from time to time by the Board and be available upon request at the District office.

If such examination and test shows the meter to register over five percent (5%) more water than actually passed through it, the inspection fee will be returned to the customer <u>and</u> the bill for the preceding billing period and current billing period will be adjusted. If a water meter is not registering in excess of five percent (5%), the inspection fee will be retained by the District.

At the customer's request, arrangements will be made for the customer to be present while the test is being made.

7.7 READY TO SERVE CHARGE

7.7.1 Authorization –

Proper authorization shall be required to seal or unseal a water meter. A service call charge shall apply to seal a water meter. There will be no charge to unseal a water meter. During the period a meter is sealed, one-half the monthly water service charge shall apply. That same charge will also apply to sealed meters converted from the discontinued category of "temporarily removed meter".

7.7.2 <u>Tampered Meters or Delinquent Bill</u> –

If meters are tampered with in any way or if a customer refuses to pay a delinquent water bill, the Manager may at his discretion have the meter removed and the fee for removing the meter shall be as fixed from time to time by the Board and be available upon request at the District office.

7.7.3 Discontinued Service –

If a property owner chooses to discontinue service and not pay the sealed meter rate (Discontinued Service) due to the effects of the Camp Fire, the property owner will not be required to pay a meter removal charge. The District will not reserve capacity for the property. If service is later reactivated, the property owner may then be responsible for the cost of LEMO (Labor, Equipment, Materials, and Overhead) for the installation of a new service line from the District Main to the property line (Service Line) in an amount not to exceed \$500. Situations in which a service line may need to be replaced include, but are not limited to:

- A. If leak occurs on the Service Line to a property with Discontinued Service, the line will not be replaced, but turned off at the District Main.
- B. If the District is replacing a mainline that serves a property with Discontinue Service, the Service Line will not be replaced.

7.7.4 Reactivating Service

A property owner reactivating service on a parcel with a Service Line that is still pressurized will be charged the same rate as a ¾" Meter Installation on a Developer Financed Service Line or LEMO, whichever is applicable. A property owner reactivating service will be subject to the fees, policies and procedures for a new application for service.

If service is reactivated within three (3) years of the date of discontinuance and an engineering review confirms there is sufficient system capacity to provide service, the applicant may resume service by paying the accrued monthly ready-to-serve fee equal to the number of months of disconnect plus an interest rate set to the prime rate of the District's Bank plus 2%.

7.8 BILLING PROCEDURES

7.8.1 Billing Period –

Section 7.8 of this policy shall constitute the District's policy on discontinuation of water service in accordance with California law. These sections of the policy and the formal shutoff notice shall be available in English, Spanish, Chinese, Tagalog, Vietnamese, Korean, and any other language spoken by at least ten percent (10%) of the people residing in the District's service area. The policy shall be posted on the District's website. The District shall annually report the previous year's number of discontinuations of residential service for inability to pay on its internet website and report this information, if required, to the State Water Resources Control Board.

Customer accounts are billed every other month. The District will endeavor to read meters on the same working date every month. Variations to this practice will be in accordance with industry-accepted practices. Customers may make advance payments to maintain water service during their absence. The billing will reflect the current credit balance until expended. Monies placed on deposit will not bear interest.

7.8.2 Service –

The District reserves the right to refuse or discontinue service to any customer who is delinquent in payment of water charges, in accordance with District policy, unless and until such payments have been paid in full. This rule shall be effective notwithstanding the fact that the customer may not be the same person who owned the property when the delinquent charges were incurred.

Where service is at risk of being discontinued, payment may be accepted from a tenant. When this occurs, the District will have no reimbursement responsibilities to any party.

7.8.3 <u>Delinquent Accounts</u> –

Bills are due and payable on the date set forth in the bill. All charges shall become delinquent if not paid within twenty-five (25) days after the date the bill is issued ("billing date"). If the bill is not paid prior to the next billing, there shall be added thereto and become a part of such charges, and be collected by the District, a penalty of two percent (2%) per month on delinquent balances. Application of such penalty shall continue until the account is current, or to the time when the unpaid and delinquent charges are added to the annual assessment of the District as provided in the Water Code.

Water services may be discontinued if an account remains delinquent seventy (70) days after the bill is mailed. If delinquent charges are not paid fifty (50) days from original billing date, a fifteen (15) day notice shall be mailed to the customer and a Fifteen Day Notice fee shall be applied to the account. The Fifteen Day Notice fee shall be established in the Fees and Charges approved by the Board of Directors.

A formal shutoff notice shall be mailed seven (7) business days prior to the scheduled delinquency shutoff. If the formal shutoff notice is returned through the mail as undeliverable, then District staff shall make a good faith effort to visit the residence and leave the shutoff notice in a conspicuous location.

The formal shut-off notice generated in accordance with this section shall include the following: 1) the customer's name and address, 2) the amount(s) delinquent, 3) the date by which payment or arrangement for payment is required in order to avoid discontinuation of service, 4) a description of the process to apply for an extension of time to pay the delinquent charges, 5) a description of the procedure to petition for bill review and appeal, and 6) a description of the procedure by which the customer may request a deferred, reduced or alternative payment schedule, including an amortization of the delinquent service charges.

If all delinquent charges are not paid, or payment arrangements have not been made within seventy (70) days from the original billing date, on the seventy-first date of delinquency, services will be terminated and a Meter Seal Fee shall be applied whether or not the meter was physically shut off. The Meter Seal Fee shall be established in the Fees and Charges approved by the Board of Directors.

All delinquent amounts and previously billed charges shall be paid before service will be reinstated.

Request for Deferred or Alternate Payment Schedule:

Written request, with supporting documentation, delivered to District customer service staff is the sole procedure by which residential customers may request deferred or alternative payment schedules, including amortization of service charges. Eligible customers are those that make written request and provide (1) certification of a primary care provider that discontinuation of residential service will be life threatening to, or pose a serious threat to the health and safety of a resident of the customer's service address; and (2) the customer demonstrates that they are financially unable to pay for water service. A customer will be deemed financially unable to pay for service within the normal billing cycle if any member of the customer's household is a current recipient of CalWORKs, CalFresh, general assistance, Medi-Cal, Supplemental Security Income/State Supplementary Payment Program, or California Special Supplemental Nutrition

Program for Women, Infants, and Children, or the customer declares that the household's annual income is less than 200 percent of the federal poverty level. Customers satisfying all of the foregoing criteria will be entitled to defer payment of delinquent charges by entering into an amortization agreement to allow the customer to pay the delinquent charges amortized over a three (3) month period, in addition to current charges that accrue for service each month. The amortization period in the agreement may be longer than three (3) months when District staff deems necessary, but shall not exceed twelve (12) months. If the customer fails to pay under the agreement for at least sixty (60) days, service may be discontinued with at least five (5) business days' notice posted at a prominent and conspicuous location at the property. Requests for deferral and amortization of bills are available to residential customers only and should be made prior to discontinuation of service by contacting Paradise Irrigation District at its office located at 6332 Clark Road, Paradise, California, telephone number 530-877-4791.

Appeal of Bill:

If a customer believes their bill, a charge thereon, or a determination of delinquency is incorrect the customer should immediately contact District staff by phone at 530-877-4971 or in person at the District's office located at 6332 Clark Road, Paradise. If the customer still believes the bill is incorrect after contacting District staff by phone or in person, they may promptly appeal a bill in writing to the District Manager no later than five (5) business days of receipt of a disputed courtesy or final delinquency notice. Customer appeal rights will lapse and be summarily rejected if not delivered and received by the District, in writing, within five (5) business days of the courtesy or final delinquency notice. Timely written appeals must state the reason(s) why the customer believes the bill is incorrect and may be mailed or delivered in person. The District Manager shall render a decision on written appeals in a timely manner, and the District Manager's decision will be considered final with respect to all charges then existing on the disputed bill. The District Manager may request additional information from the appealing customer and/or may conduct a hearing, if the District Manager believes such process will help in rendering a decision on the customer's appeal. The District Manager's decision, including the District Manager's findings, shall be provided to the customer in writing. Service shall not be discontinued while a written appeal is pending before the District Manager.

Written appeal to the District Manager is the sole procedure by which a customer may request reduced fees. The District Manager may grant such request, in the District Manager's discretion, only upon a finding that there was an error in computation of the customer's fees. Potential reduction in fees are available to residential services only.

Termination of Water Service to Residential Occupants including those Served through a Master Meter or Individually Metered Tenants of Multi-Unit Residential Structures Implementing Public Utility Code Section 16481.1 B and Health and Safety Code § 116916 (b)

Paradise Irrigation District serves water to residential occupants through a master meter and individual meters in single-family and multi-unit residential structures and mobile home parks, where the owner, manager, or operator is listed as the customer of record.

These rules and regulations establish the procedure by which the District will inform the residential occupants of their rights when the master meter account or individual meter account is in arrears and service to the master meter or individual meter is threatened with termination.

1. Notice to Residential Occupants

Where the owner, manager or operator of a multi-unit residential structure or mobile home park or similar facility is listed by the District as the customer of record and the account is in arrears, every good faith effort will be made to inform the residential occupants by means of a written notice posted on the door of each residential unit at least fifteen (15) days prior to service termination that service will be terminated on a date specified in the notice. If it is not reasonable or practicable to post the notice on the door of each residential unit, two copies of the notice will be posted in each common area and at each point of access to the structure or mobile home park or similar such area. The notice will be in English, Spanish, Chinese, Tagalog, Vietnamese, Korean, and any other language spoken by at least ten percent (10%) of the people residing in the District's service area.

The notice will inform the residential customers of the following:

- a. That they have the right to become utility customers of the District to whom the service will be billed; and
- b. That they can become utility customers in this way without being required to pay the amount due on the delinquent account; and
- c. That in order to prevent the termination of service or to re-establish service, the residents must contact the District to sign up for service as set forth below.

2. <u>Guidelines for Residential Occupants to Become Utility Customers of Paradise Irrigation District</u>

Residential occupants of a multi-unit residential structure, mobile home park, or similar facility can become utility customers of the District and avoid termination of service, or reestablish service by becoming utility customers. The residential occupant should contact Paradise Irrigation District at its office located at 6332 Clark Road, Paradise, telephone number 530-877-4971, to request service.

The District may request the residential occupant to demonstrate creditworthiness as a condition for establishing credit. Creditworthiness will be established by the residential occupant by providing proof of prompt payment of rent or other similar credit obligations which have accrued during a six-month period of time prior to application for service.

The residential occupant may also want to contact the Community Legal Information Center at 25 Main Street, Suite 102, Chico, telephone 530-898-4354, which has been recommended by the Butte County Bar Association to provide legal advice in connection with these matters.

The District is not required to make service available to the residential occupants unless each residential occupant or a representative of the residential occupants agrees to the terms and conditions of service and meets the requirements of these Rules and Regulations. If one or more of the residential occupants, or a representative of the residential occupants are willing and able to assume responsibility for subsequent charges to the master meter account to the satisfaction of the District, service will be made available to the residential occupants who have met those requirements or on whose behalf those requirements have been met. A representative of the residential occupants does not include a tenants' association.

3. Liberal Construction

The District will liberally construe these Rules and Regulations to accomplish the purpose of ensuring that service to the residential occupants of a multi-unit residential structure, mobile home park or similar facility provided service through a master meter is not terminated due to non-payment unless the District has made every reasonable effort to continue service to the residential occupants.

End Discontinuance of Water Policy

Property owners shall be responsible for and receive all water statements regardless of whether or not the property or premises is being rented or leased by others. Only property owners shall be allowed to make application for water service. A property owner may request duplicate bills be sent to the tenant for a fee. The property owner will remain responsible for unpaid charges. The Duplicate Billing Fee shall be established in the Fees and Charges approved by the Board of Directors.

The District reserves the right to refuse or discontinue service to any customer who is delinquent in payment of water charges unless and until such payments have been paid in full. This rule shall be effective notwithstanding the fact that the applicant may not be the same person who owned the land when the delinquent charges were incurred.

All delinquent water bills and charges for service remaining unpaid at the time of setting the annual tax rate may be added to and become part of the annual assessment levied by the District as provided for in the Water Code of the State of California.

The District Billing Clerk with approval of the District Manager may file a lien against the property for delinquent water bills and charges for service. The District Billing Clerk, with the approval of the District Manager, may require a deposit, up to the equivalent of the charge for 150 days maximum use, in the event of a bankruptcy after the date of order for relief. The deposit may be applied to 20 percent of each bill until the deposit is reduced to the equivalent of 30 days (1 billing period) maximum use. This reduced deposit shall remain for one year at which time it may be credited to succeeding bills until depleted.

7.9 LEAK POLICY, ADJUSTMENTS, AND APPEALS

The customer is responsible for all water going through the meter. Leaks caused by frozen or broken pipes, damage, or other leaks on the customer's side of the meter shall be the responsibility of the customer. The District may, upon request of the customer, provide for a payment plan of up to one year, with no penalties, to assist customers in paying amounts billed that are attributed to a leak.

An identified leak will not result in a customer moving to a higher service charge classification so long as the leak is repaired in a timely manner. Upon request of the customer, the District will determine if a leak will result in a change in classification, based upon the circumstances, magnitude, and duration of the leak.

Online customer usage data and leak notification is available to customers. The customers are expected to respond to leak detection notifications from the District and repair leaks promptly.

The District may, upon written request of a customer supported by repair bills or other appropriate documentation, adjust such customer's bill in the case of loss of water due to circumstances beyond the reasonable control of such customer, such as a mechanical malfunction, blind leak, theft of water, vandalism, unexplained water loss or other unusual or emergency conditions. Adjustments shall not be made for faucet or toilet leaks.

The District will use its automated billing system to determine the amount of water usage attributable to the leak. Customers that fix leaks within seven days of the District's leak notification, may, upon the customer's request, and if the District determines that an adjustment is appropriate and reasonable under the circumstances, receive a credit for leak usage of up to seven days from the District's notification.

The District Manager, or his or her designee, may, in his or her sole discretion, grant an adjustment for usage attributed to the leak that occurred after the above-described sevenday period. In making such a determination, the District Manager, or his or her designee, may take into account the cause of water loss, any negligence or fault of the customer in connection therewith, and the difficulty of repair.

Any customer seeking relief under this policy must make a written request to the District as soon as possible and in no event later than ninety days after the closing date of the billing cycle in which the leakage occurred.

The District's determinations under this policy will be made by District staff in writing and mailed to the owner at the billing address on the District's records. Any person aggrieved by a staff determination may file a written appeal to the Board of Directors, no later than sixty days after the date of staff's determination. The Board will consider the appeal and make its decision at a noticed public meeting.

Paradise Irrigation District

Customer Recovery Support Committee

Date 3/31/2021

Future Agenda Item

Discontinuance Policy 7.7.3

Notes

7.7.3

"Discontinued Service – If a property owner chooses to discontinue service and not pay the sealed meter rate...."

At the special board meeting on 3/29/2021 the PID board of directors took questions from the public, (concerned customers) regarding the confusion over stand by rates, unmetered rates, discontinuance policy and reconnection fees.

There was much discussion over past policy, current policy and future policy. Most of the questions came from individuals who had paid the standby fees and how they felt slighted. A grace period was given to prior customers who had disconnected to avoid paying fees and were now being allowed to hook up without having to pay for the past standby rates they would have incurred if they had not disconnected.

I believe there may be a way to balance this issue that most would be in favor of.

- 1. All parcels that are within the PID district should be assessed the standby rate if they are currently undeveloped and had PID water service before the Camp fire.
- 2. The standby rate should only be charged to the lot owner if the parcel has water service currently available to it. If the line feeding the parcel is NOT serviceable then it should be deferred in fees until the owners apply for a building permit to construct or until PID has provided new service to the parcel.
- 3. Once the lot is under construction the service fee should go to an unmetered rate until construction is concluded.
- 4. When the occupancy certificate has been issued to the homeowner the rate should go back to the metered rate.
- 5. If a parcel owner chooses to not pay the standby rate as billed, the fees can be accrued until the parcel is developed or sold.

Paradise Irrigation District

Customer Recovery Support Committee

- 6. The rate should continue to accrue until it is equal to the fee that would be charged for a new connection. Once that amount has been reached, the current parcel owner would not incur any additional fees until the parcel was developed.
- 7. Those parcel owners who did not disconnect and continued to pay the standby rate should be credited for those payments against the new connection fee. If the payments are equal to or greater than the new connection fee, they have met their out-of-pocket expense until the parcel is sold or developed.
- 8. If the parcel is sold the accrued fees will become due to PID.
- 9. The new owner will receive the same credit for fees paid by the previous owner.
- 10. If the lot is not developed within a 4 year period, the fees will again start to accrue just as before and will continue in the same manner until the parcel is eventually developed.

If the meter currently serving the property is serviceable, it should be left in as it could possibly avert a fire if these lots need to be cleaned periodically, as well as providing occasional flushing of dead legs in the distribution system. Any fees that are required to repair or restore the service to the lot should be the responsibility of PID not the owner. The owner should only be responsible for fees after the backflow preventer. It is my understanding that FEMA is paying for new meters and backflow preventers. We should not make it difficult to encourage rebuilding

It is a requirement of the state that PID as a special water district maintain a Cross Connection & Backflow Control program. This is an operating expense of the Special Water District (PID). It is not the customers expense as going forward all connections to the distribution system must be protected with backflow prevention. Especially since it is required to upgrade to the new RP style.

Further, the backflow devices should all be installed by PID to the same standard. Any prior devices that were installed by the owner should be inspected and if found to be acceptable to PID, the customer should get a credit on their account equal to the PID cost to install one of it's backflow preventers. PID will now own that device and will charge for future testing just as they would for the devices that PID is installing. Just as the meter is owned by PID, so should the backflow preventers. The cost for testing these devices should be an expense of the district and should be calculated in its fee structure based on the service meter size to all PID customers.

Cliff Jacobson Committee Member

PID Disconnect Policy



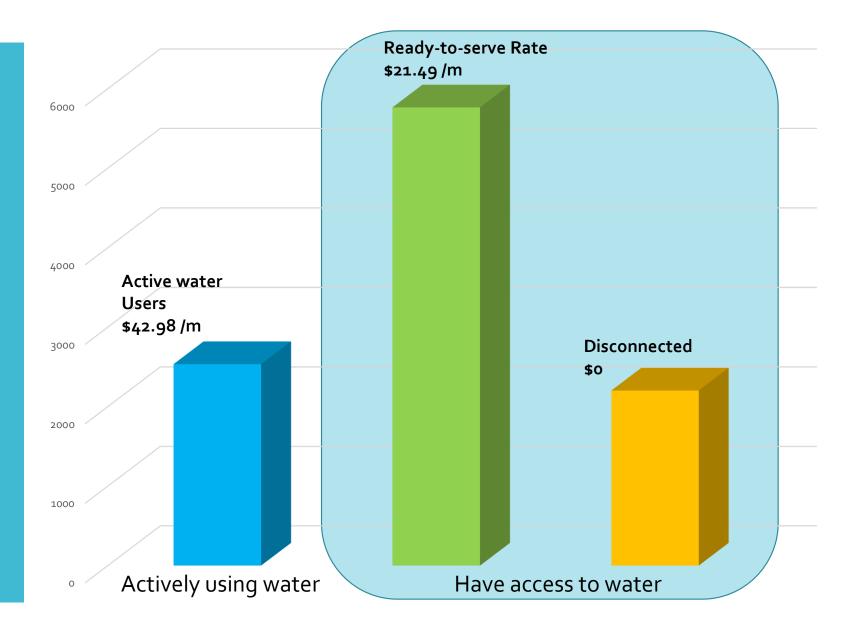
Our water. Our future.

Paradise Irrigation District

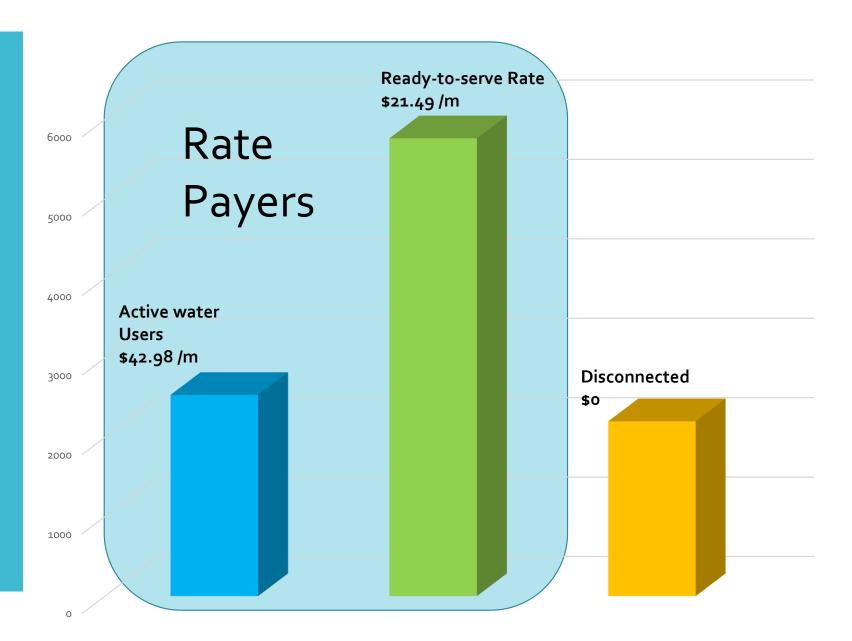




Current Breakdown of Customer Type



Rate Payers are potentially subsidizing non-rate payers



Speaking of subsidies ...

Didn't PID get State backfill money ???

• PID received two-years state backfill for 2019/20 & 2019/2021

 There is no commitment from the State for backfill funding for the upcoming fiscal year

Let's talk about the disconnect policy

Pre-fire Policy

A disconnected property does not receive maintenance and would pay for the cost to reconnect later based on actual cost but retains paid capacity

Temporary Camp Fire Policy

Through December of 2020 a disconnected property does not receive maintenance and would pay actual cost to reconnect with a max of \$500.00 for the cost to reconnect

Property owners signed for the disconnect.

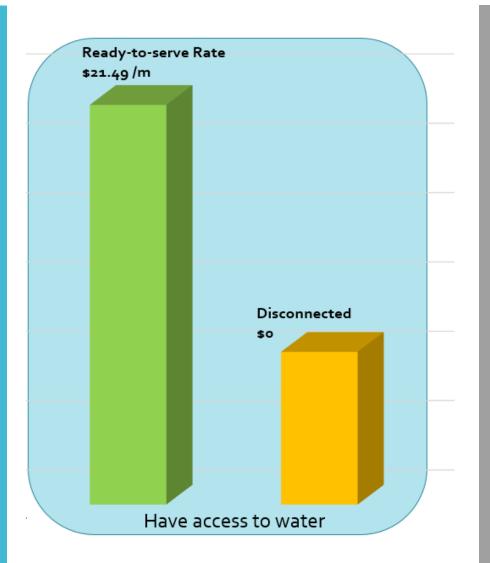
New Policy

A disconnected property does not retain capacity and is subject to the same policies, procedures and costs as a new connect.

3-year safety net: If reconnect is desired within 3 years of disconnect, pay deferred ready-to-serve rate.

Range: 1m:\$21.49 – 36m:\$773.64

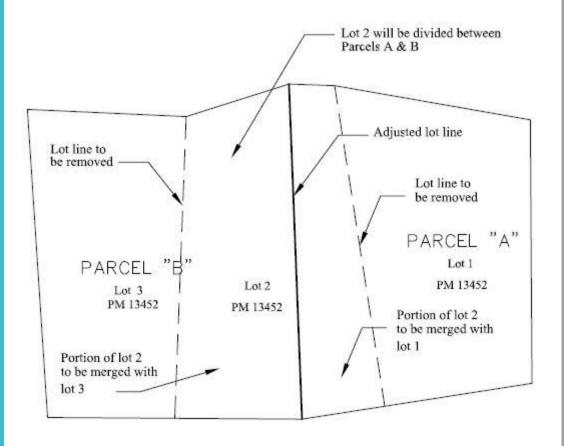
Why a new disconnect policy?



• Ensures a fair cost of service for like-service-levels.

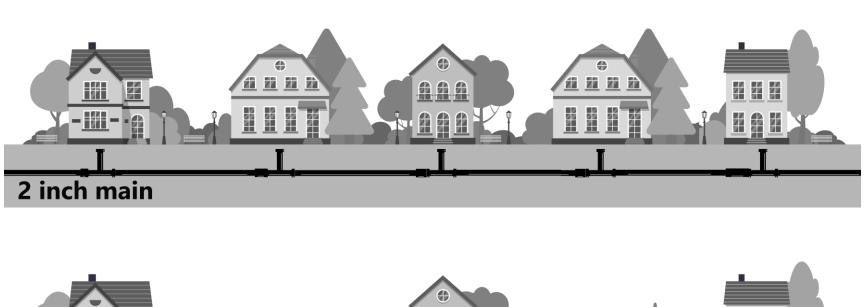
Why a new disconnect policy?

LOT MERGER



Relieves the rate payers from paying for maintenance for a parcel that does not want service.

Why a new disconnect policy?





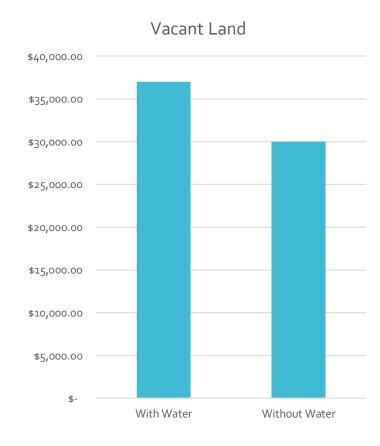
Planning.

What's the benefit to staying connected?

Access to water



Increased Property Value



What are the impacts to a customer that disconnects?

- Don't have access to water at their property
- An unknown cost to reconnect
 - Future capacity fee changes
 - Changing regulations
 - Neighborhood changes

Staff Recommended Changes

Customer Feedback on the current policy

- Current ratepayers do not want to subsidize those who have disconnected and return later.
- Many disconnected property owners are still awaiting PG&E settlement and then plan to sell the property.
- 155 customers have reconnected since last Wednesday and the majority of these customers have recently purchased the property.

Based on customer feedback

8

Requirements to charge actual cost

- Continue our capacity fee study
 - Result in an increased capacity fee
- Allow disconnected customers to retain their paid capacity and only pay the difference in capacity fee plus the actual costs to reconnect.

Board Discussion & Public Comment