

March 28, 2018

The Honorable Ben Hueso, Chair  
California State Senate Energy, Utilities, and Communications Committee  
State Capitol, Room 4035  
Sacramento, CA 95814

**RE: SB 998 (Oppose Unless Amended)**

Honorable Chair Hueso:

I am writing regarding SB 998 (Dodd) as amended on March 22, 2018. This bill, if passed, would have significant and detrimental impacts on our District, and for that reason, we have taken an **OPPOSE UNLESS AMENDED** position.

SB 998 presents several areas of concern to our agency: 1) it is an overly-prescriptive measure that requires specific policies and practices in a one-size-fits-all approach encompassing 3,000+ water agencies statewide; 2) there are unsubstantiated assumptions made about customers who do not pay their water bills; 3) the verification processes that would be required to implement the bill; and 4) the potential for fraud and abuse.

By way of background, Camrosa Water District is a medium-sized district in Ventura County serving 35,000 customers: residential, commercial, industrial, and institutional, including CSU Channel Islands. Annually, Camrosa delivers approximately 15,000 acre-feet of potable, non-potable, and recycled water. We also provide sewer services in some portions of the District.

Water shutoffs impact a small portion of our customers, yet they are a necessary last resort. Our processes are clearly outlined in Camrosa's Ordinance 40-16, Rules and Regulations Governing the Provision of Water and Sanitary Services (enclosed), and they contain many of the same provisions outlined in the bill, such as payment arrangements and an appeals process. These commonsense provisions work well for our District and customers because they allow the flexibility needed to address situations on a case-by-case basis. Turning off a household's water is something we do not take lightly, and we work with our customers whenever possible to avoid this step. We are supportive of requiring that water agencies provide for some sort of payment arrangement and have an appeals process, but the details of both should be left to the local agency to develop.

Unfortunately, SB 998 goes far beyond outlining provisions of a shutoff policy. The bill makes a host of assumptions about customers' ability to pay based on a variety of unrelated factors, such as age, disability status, and household occupants. The mere existence of any or all of these circumstances *in no way* indicates income and/or financial status of a household. In fact,

it is rather offensive to assume that residents in these circumstances require special treatment based on the presumption that they are unable to pay their water bill.

Verification of the different requirements of this bill is also problematic. Validating income is not an appropriate role for water suppliers, nor is authenticating disabilities, incarcerations, economic hardships, deportations, and deaths—all of which would be required should this bill go into effect. These roles are far beyond the scope of a water agency's mission.

Finally, the potential for fraud in SB 998 is great. The involvement of a local health department in assessing and approving a discontinuation of service not only creates a cumbersome and complicated process, but would encourage abuse, as simply a *request* for an assessment prohibits the discontinuation of service. In addition, the bill's mandatory 60-day delinquency requirement prior to shutoff could lead to a customer receiving four months' worth of water service for free. This would result in a loss of revenues for districts that would unfairly burden other customers who would have to shoulder the financial impact of these missed payments.

In closing, I would reiterate that discontinuation of water service to customers is a last resort, and Camrosa closely follows our established policies and procedures when taking this step. We do not oppose the idea of districts being required to have fair, transparent shutoff policies, but this bill goes far beyond reasonableness in its assumptions, exceptions, and expectations of water suppliers.

Sincerely,



Tony L. Stafford  
General Manager

cc: Members, Senate Energy, Utilities, and Communications Committee  
The Honorable Hannah-Beth Jackson, Senator, 19<sup>th</sup> District  
The Honorable Jacqui Irwin, Assemblymember, 44<sup>th</sup> District  
The Honorable Bill Dodd, Senator, 3<sup>rd</sup> District