



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Bear Valley Electric Service, Inc. (913-E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Jeff Linam

Phone #: (909) 394-3600 x664

E-mail: RegulatoryAffairs@bvesinc.com

E-mail Disposition Notice to: RegulatoryAffairs@bvesinc.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 495-E

Tier Designation: Tier 3

Subject of AL: Bear Valley Electric Service, Inc.'s Implementation of Income-Graduated Fixed Charges Pursuant to Ordering Paragraph 10(b) of Decision 24-05-028

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 24-05-028

Does AL replace a withdrawn or rejected AL?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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

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: 10/1/24

No. of tariff sheets: 0

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 proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss 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](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Jeff Linam  
Title: Regulatory Affairs Manager  
Utility Name: Bear Valley Electric Service, Inc.  
Address: 630 E. Foothill Blvd  
City: San Dimas State: California  
Telephone (xxx) xxx-xxxx: (909) 394-3600 x664  
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Name: Alicia Menchaca  
Title: Rate Analyst, Regulatory Affairs  
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Bear Valley Electric Service, Inc.  
P.O. Box 9028  
San Dimas, CA 91773-9028  
A Subsidiary of American States Water Company

September 12, 2024

Advice Letter No. 495-E

(U 913 E)

## I. California Public Utilities Commission

Bear Valley Electric Service, Inc. ("BVES") hereby transmits for filing the following:

**SUBJECT:** IMPLEMENTATION OF INCOME-GRADUATED FIXED CHARGES  
PURSUANT TO ORDERING PARAGRAPH 10(B) OF DECISION 24-05-028

### **PURPOSE**

Pursuant to Decision ("D.") 24-05-028, Ordering Paragraphs ("OP") 10(B), BVES is filing this advice letter to the California Public Utilities Commission ("Commission") requesting approval to implement its income-graduated fixed charges and provide a proposed a marketing, education, and outreach plan.

*10. Bear Valley Electric Service, Inc., Liberty Utilities, and PacificCorp d/b/a Pacific Power shall each (a) participate in the large utilities' marketing, education, and outreach workshop to discuss the large utilities' plans, research findings, and messaging, and (b) within 120 days of the issuance date of this decision, file a Tier 3 advice letter to implement income-graduated fixed charges, propose a marketing, education, and outreach plan, propose a line-item budget for implementation costs, and provide a justification for each proposed line-item cost. Each of the small and multijurisdictional utilities shall include the following information in the Tier 3 advice letter: (i) a list of all base revenue cost categories that the utility proposes to recover through its income-graduated fixed charges and the revenue requirement associated with each cost category; (ii) an explanation of why each listed base revenue cost category is a fixed cost similar to a category approved for recovery through this decision; (iii) the revenue requirement for each of the fixed cost categories approved in this decision, if applicable to the utility; (iv) an explanation of how each base revenue cost category was converted from the current volumetric rate to a new per customer rate, if it is incremental to the current fixed charges; (v) proposed fixed charge levels; and (vi) a bill impact analysis demonstrating that both Tier 1 and Tier 2 customers with average electricity usage in each baseline territory will realize a bill savings compared to currently effective rates.<sup>1</sup>*

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<sup>1</sup> D.24-05-020, pp. 164-165

**BACKGROUND**

On June 30, 2022, California Assembly Bill 205 (“AB 205”) became law. Among other provisions, AB 205 amended California Public Utilities Code Section 739.9(d) to provide that the Commission “may adopt new, or expand existing, fixed charges for the purpose of collecting a reasonable portion of the fixed costs of providing electrical service to residential customers.”

On July 22, 2022, the Commission initiated Rulemaking (“R.”) 22-07-005, with the intent to “advance the following objectives: (a) enhance the reliability of California’s electric system; (b) make electric bills more affordable and equitable; (c) reduce the curtailment of renewable energy and greenhouse gas emissions associated with meeting the state’s future system load; (d) enable widespread electrification of buildings and transportation to meet the state’s climate goals; (e) reduce long-term system costs through more efficient pricing of electricity; and (f) enable participation in demand flexibility by both bundled and unbundled customers.”<sup>1</sup> Phase 1, Track A of the proceeding is scoped to address how the Commission should authorize an income-graduated fixed charge (“Fixed Charge”) in accordance with AB 205.<sup>2</sup>

On May 15, 2024, the Commission issued the Decision which authorizes all California investor-owned electric utilities (“IOUs”) to change the structure of residential customer bills in compliance with AB 205, shifting the recovery of a portion of fixed costs from volumetric rates to a separate, fixed amount on residential customer bills without changing the total costs that utilities may recover from customers, thus reducing the volumetric price of electricity (in cents per kilowatt hour) for residential customers.<sup>2</sup>

**DISCUSSION**

As directed by AB 205, the Decision authorizes all IOUs to change the structure of residential customer bills by shifting the recovery of a portion of fixed costs from volumetric rates to a separate, fixed amount on bills without changing the total costs that utilities may recover from customers. As a result, the Fixed Charge reduces the average residential volumetric price of electricity (in cents per kilowatt hour) of IOUs. The Decision adopts a gradual approach to implementing AB 205 requirements, including the requirement to offer income-graduated fixed charge amounts. The adopted billing structure will offer discounts based on the existing income-verification processes of the utilities’ California Alternate Rates for Energy (“CARE”).<sup>3</sup>

In accordance with the Decision, BVES submits this AL to implement the Fixed Charge, remove minimum bills from residential customers bills (where applicable), and propose

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<sup>2</sup> D.24-05-020, p. 2

<sup>3</sup> D.24-05-028, Conclusions of Law (“COL”) 13 at 148. BVES does not have a FERA program.

a Marketing, Education & Outreach (“ME&O”) Plan.<sup>4</sup> Appendix A contains four sections that describe the following:

- Section 1 - Implementation
- Section 2 - Marketing, Education & Outreach Plan
- Section 3 - Fixed Charge Tier Assignments
- Section 4 - Rate Design

### **TIER DESIGNATION**

This advice letter is submitted with a Tier 3 designation, pursuant to D.24-05-028.

### **EFFECTIVE DATE**

BVES respectfully requests that this submittal be approved upon Commission Resolution.

### **NOTICE AND PROTESTS**

A protest is a document objecting to the granting in whole or in part of the authority sought in this advice letter. A response is a document that does not object to the authority sought, but nevertheless presents information that the party tendering the response believes would be useful to the Commission in acting on the request.

A protest must be mailed within 20 days of the date the Commission accepts the advice letter for submission. The Calendar is available on the Commission's website at [www.cpuc.ca.gov](http://www.cpuc.ca.gov).

A protest must state the facts constituting the grounds for the protest, 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. 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.

The utility must respond to a protest within five days.

### **All protests and responses should be sent to:**

California Public Utilities Commission, Energy Division  
505 Van Ness Avenue  
San Francisco, California 94102  
E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

The protest or correspondence should also be sent via U.S. mail and/or electronically, if possible, to BVES at the addresses shown below on the same date it is delivered to the Commission.

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<sup>4</sup> D.24-05-028., COL 33 at 153 - 154.

Bear Valley Electric Service, Inc.  
Regulatory Affairs  
E-mail: [RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com)

If you have not received a reply to your protest within 10 business days, please contact Jeff Linam at (909) 630-5555.

**Correspondence:**

Any correspondence regarding this compliance filing should be sent by regular mail or e-mail to the attention of:

Jeff Linam  
Manager, Regulatory Affairs  
Bear Valley Electric Service, Inc.  
630 East Foothill Blvd.  
San Dimas, California 91773  
Email: [RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com)

The protest shall set forth the grounds upon which it is based and shall be submitted expeditiously. There is no restriction on who may file a protest.

Sincerely,

/s/Alicia Menchaca  
Alicia Menchaca  
Rate Analyst, Regulatory Affairs  
Bear Valley Electric Service, Inc.

cc: Jenny Au, Energy Division  
R. Mark Pocta, California Public Advocates Office  
BVES General Order 96-B Service List  
Service list for R.22-07-005

## APPENDIX A

### Income-Graduated Fixed Charge Implementation and Proposed Marketing, Education, and Outreach Plan

**IMPLEMENTATION (SECTION 1)****MARKETING, EDUCATION, & OUTREACH PLAN (SECTION 2)****FIXED CHARGE TIER ASSIGNMENTS (SECTION 3)****RATE DESIGN (SECTION 4)****1. Implementation**

This section provides an overview of the Fixed Charge tier structure pursuant to Decision (“D.”) 24-05-028, Ordering Paragraphs (“OP”) 10(b) and outlines Bear Valley Electric Service, Inc.’s (“BVES”) activities to implement the Fixed Charges. Implementation activities include timing and approach, removal of minimum bills, customer support resources, measurement and evaluation, and budget.

**1.1 Fixed Charge Tier Structure**

In accordance with the D.24-05-028, BVES will adhere to the following measures:

- (1) Participate in the large utilities’ Marketing, Education, and Outreach workshop to discuss the large utilities’ plans, research findings, and messaging. (OP No. 10a)
- (2) File a Tier 3 advice letter to implement income-graduated fixed charges, propose a marketing, education, and outreach plan, propose a line-item budget for implementation costs, and provide a justification for each proposed line-item cost.

BVES will include the following information in the Tier 3 advice letter: (i) a list of all base revenue cost categories that BVES proposes to recover through its income-graduated fixed charges and the revenue requirement associated with each cost category; (ii) an explanation of why each listed base revenue cost category is a fixed cost similar to a category approved for recovery through D.24-05-028; (iii) the revenue requirement for each of the fixed cost categories approved in D.24-05-028, if applicable; (iv) an explanation of how each base revenue cost category was converted from the current volumetric rate to a new per customer rate, if it is incremental to the current fixed charges; (v) proposed fixed charge levels; and (vi) a bill impact analysis demonstrating that both Tier 1 and Tier 2 customers with average electricity usage in each baseline territory will realize a bill savings compared to currently effective rates. (OP No. 10b)

- (3) Record any over- or under-collection of revenues by income-graduated fixed charges as a separate line-item in its existing Base Revenue Requirement Balancing Account. (OP No. 11)
- (4) Consult with PacifiCorp to understand how PacifiCorp differentiates between single-



and multi-family housing and whether it would be feasible for BVES to collect and use similar data for the purpose of differentiating fixed charges; and present their findings at the workshop hosted by the large utilities regarding differentiating between single- and multi-family households; and file a report in this proceeding within 90 days of the workshop. (OP No. 12)

- (5) Serve a report on the service list of this proceeding within 60 days after each anniversary of the launch of its income-graduated fixed charges the following metrics: number of customers in each tier, the number of customers who changed tiers, and average customer bill impacts for each tier and each baseline territory. (OP No. 13)

Once the required billing system changes are in place and appropriate pre-transition ME&O has been accomplished, BVES will begin to bill residential customers on the Fixed Charge rate structure.

### **1.2 Removal of Minimum Bills**

BVES will remove the minimum bill if the minimum bill for part-time residential customers is less than the approved fixed charge.

### **1.3 Implementation Timing and Approach**

Pursuant to D.24-05-028, BVES will implement the Fixed Charge in the first quarter of 2026.<sup>1</sup> To ensure the overall accuracy and consistency in the billing process for calculating and applying the Fixed Charge, BVES will implement the Fixed Charge in its billing system for residential customers at one time. This will be accomplished by creating a common system design and architecture for calculating and applying the Fixed Charge, which can then be applied to any of BVES's applicable residential rate schedules. This approach will ensure completeness in calculations and allow for thorough end-to-end billing calculation testing.

### **1.4 Community Choice Aggregator Coordination**

BVES does not have any CCAs in its service territory.

### **1.5 Customer Support Resources**

BVES anticipates the introduction of a Fixed Charge will create an incremental increase in calls to BVES's Customer Care Center during the initial phase-in time period. BVES's Customer Care Center will be provided with training and scripting to handle and manage

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<sup>1</sup> D.24-05-028, p. 141

the additional calls expected prior to transition, during transition, as well as after residential customers have transitioned to a Fixed Charge. The Customer Call Center will be trained on how to handle general inquiries about the Fixed Charge, inquiries from our solar and CARE customers who want to understand how the Fixed Charge impacts them, as well as inquiries on how the Fixed Charge tier assignments are determined.

### 1.6 Measurement and Evaluation

Pursuant to D.24-05-028 (OP No. 13) BVES will compile and report metrics on the Fixed Charge and associated ME&O efforts within 60 days of each anniversary of the launch of its income-graduated fixed charges.<sup>2</sup> Metrics to be reported on include:

- Number of customers in each tier;
- Number of customers who changed tiers;
- Average customer bill impacts for each tier and each baseline territory

BVES will meet the required metrics as follows:

1. BVES will track the number of customers that fall into each tier when the IGFC takes effect in 2026. At the end of the year, BVES will tally the number of customers that fall into each tier and include the metric in the annual report.
2. BVES will identify customers who changed tier designation during the year and total the number of customers who changed tiers. These changes will be included in the annual report, as well as any new accounts that started after the report year.
3. BVES will compute actual bills using the IGFC rates as well as bills using the rate structure prior to the start of the IGFC year and provide the proportion of bills that were higher due to IGFC rates in the annual report. BVES has only one baseline territory.

For more information on ME&O metrics, see Section 2.7.

BVES proposes no additional CARE reporting for the Fixed Charge and does not have a FERA program. This will not preclude BVES from reporting the statistics of each tier as discussed above.

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<sup>2</sup> D.24-05-028, p. 166

## **2. Marketing, Education & Outreach**

Marketing, Education & Outreach (“ME&O”) to residential customers is fundamental to raising awareness, promoting understanding, and encouraging acceptance of the Fixed Charge. BVES’s ME&O approach is designed to educate residential customers about how the Fixed Charge will help address equity and affordability issues, and importantly, how it sets the stage for greater adoption of electrification in California by reducing volumetric rates for all residential customers. Effective communication before, during, and after Fixed Charge implementation will be critical to providing a positive customer experience regarding the change in how they are billed for electricity.

### **2.1 ME&O Objectives and Strategies**

The goals and objectives for BVES’s ME&O are to:

- Educate residential customers on the way they are charged for electricity.
- Inform customers on how it will be changing, why and when the new structure is being applied, what the Fixed Charge will be applied to, how their bill may be impacted, and helpful ways to manage energy costs.
- Explain that the Fixed Charge is an existing separate line item shown on their bill on a per meter, per day basis.
- Assure CARE customers that their assistance program discounts will not be affected by the fixed charge, and would see a reduction in monthly bills without changes to usage.<sup>3</sup>
- To have an incremental approved budget to cover IGFC ME&O expense separate from existing programs, such as CARE.

BVES’s ME&O strategies include:

- Using a multi-channel/multi-phased/integrated approach aimed at residential customers to maximize awareness, understanding, and acceptance by addressing perceptions and misperceptions of the Fixed Charge.
- Providing simple, clear, and transparent communications.

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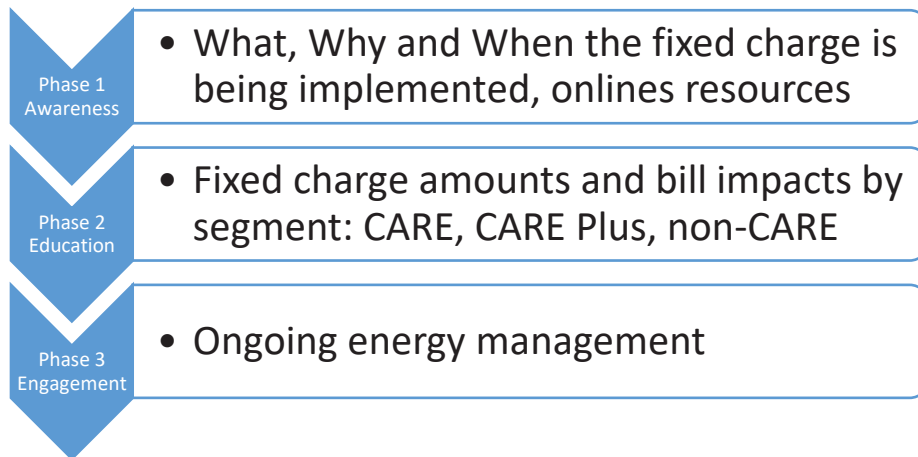
<sup>3</sup> D.24-05-028, p. 122

- Using customer insights and segmentation to tailor appropriate communications for subgroups more likely to need specialized outreach, such as CARE.
- Providing in-language communication for multilingual customers.
- Offering and promoting online information to make it easy to inform and educate customers.
- Leveraging Community Based Organizations (“CBO”) to notify and educate hard-to-reach customers.

## 2.2 Over-Arching Phased Approach

Research findings from April 2024, conducted by the large utilities, show that customers' preferences vary on when they would like to learn about the Fixed Charge. BVES plans to implement ME&O using a phased approach to achieve the previously stated utility outcomes of Awareness, Education, and Engagement. This strategy will guide the timing of tactics and the progression of messaging through the various marketing and outreach channels:

### I. Figure 1: BVES ME&O Phased Approach



**Phase 1 – Awareness:** Beginning up to 9 months before implementation, the Awareness phase will set the context for what the Fixed Charge is, why it is being implemented, and when it will take effect. Awareness messaging will include basic education around what goes into electric bills, such as the difference between fixed, base, and supply charges. Tactics and messaging in this phase are broad, over-arching, and conceptual.

**Phase 2 – Education:** Up to 90 days prior to implementation, the Education phase will further explain bill impacts, including the Fixed Charge amount a customer has been assigned. These materials will remind customers when to expect to see the Fixed Charge on their bill and reinforce available online resources where they can get more information.

**Phase 3 – Engagement:** After implementation, the Engagement phase will focus on the total bill and rate education.

### 2.3 Messaging

In Phase 1 (Awareness), all customers will receive base messaging that provides overarching information about the fixed charge. Initial marketing materials and early messaging will communicate how the charge will apply to all residential customers, emphasize why the change is occurring and illustrate what the proposed Fixed Charge means to the structure of customer bills. BVES will engage stakeholders, such as local media, elected officials, and CBOs early in the process to help prevent any initial misunderstandings around the change in the way customers are billed.

Building on Phase 1, Phase 2 (Education) will expand to clearly explain what to expect, when and where to find more information. Messaging will include the customer's Fixed Charge amount, how the Fixed Charge reduces the price per kWh for energy used. BVES intends to shift from generalized information to more targeted and tailored information closer to the implementation date. BVES plans to create representative sample scenarios with average monthly usage combined with assigned Fixed Charge for the various customer segments. These scenarios will include a breakdown of the Fixed Charge and the sample BVES volumetric usage charge to illustrate how the costs are not new but have only been reallocated. As with other major changes to rates or bill structures, it will be critical to steer customers toward segmented information about how the change may affect their bill. This information will be provided on BVES's website and in customer notifications, as shown in Section 2.6.4. BVES does not have any CCAs in its service territory.

Once the Fixed Charge is implemented in Q1 2026, Phase 3 (Engagement) will continue to support the customer transition with messaging about behaviors and actions they can take to manage their bills.

All three phases will provide targeted messages specific to current and potentially new CARE customers.

### 2.4 High-level Message Alignment

In conjunction with the other IOUs, BVES plans to continue to work on messaging alignment across all aspects of the Fixed Charge. Examples of message alignment with the Joint IOUs include:

- Fixed Charge Naming Recommendation: Base Services Charge
- The “Why” - Explain why the change is happening in clear and simple terms, e.g. *“In order to help make energy bills more transparent and encourage the use of cleaner energy and greater electrification, California state law Assembly Bill 205, requires BVES and the other state utilities to adjust the way we bill residential customers.”*

- The “What” - Explain what the billing change will look like on monthly bills, using graphics where possible and provide segmented bill samples so customers can see what amounts go toward fixed charge vs. usage charge, e.g. *“A fixed monthly charge called **Base Services Charge** of \$23.22 covers some of the cost of maintaining the electric grid and providing customer support. For customers enrolled in CARE (bill discounts), the fixed charge is \$10.06 and CARE Plus is \$5.00. A separate charge for every kilowatt-hour (kWh) used will be lower per kWh than comparable fully volumetric rates.”*
- Further make it clear this change affects all residential customers; but that existing plans are to be rolled into this program, e.g. *“This change affects all residential customers including those with CARE; solar and DGS rates, homeowners and renters. This billing structure change does not affect existing rate plans.”*
- The “When” - Make it clear to customers when the change is happening, e.g. *“In March 2026, all BVES residential customers will see these changes to their bill.”*
- Support and Resources - Make online resources for questions, rate plan options clear and include a link to a Frequently Asked Questions (“FAQ”) page for topics not addressed, e.g. *For more information on the new Fixed Charge, visit our landing page at...”*

## 2.5 Target Audiences and Segmentation

ME&O will rely on bill analysis, tier assignments of known customers, and research to determine target audiences, assess impacts, and determine customer segments warranting specialized messaging where possible. BVES is planning on a segmentation strategy that categorizes customers into similarly impacted groups such as CARE, Medical Baseline/AFN, solar and distributed generation, sub-metered (mobile home parks) and general (non-CARE) customers. BVES intends to customize its messaging to address the unique needs of each targeted segment.

## 2.6 CARE and CARE Plus

In addition to notifying existing CARE customers that they will receive the Tier 2 (100-200% FPL) Fixed Charge automatically, BVES will include messaging that confirms the continuation of their CARE discount and that if they are removed from the CARE program for any reason, they will automatically be transitioned to the Tier 3 default Fixed Charge. Additionally, BVES will leverage existing CARE materials, such as the confirmation welcome letter, to remind customers that their Tier 2 placement is dependent on their enrollment in the program.

Similar to CARE, CARE Plus (up to 100% FPL) will include messaging that informs customers of additional discounts for income qualified individuals and families and that if they are removed from the CARE Plus program for any reason, they will automatically be transitioned to the Tier 3 default Fixed Charge and will have to reapply for either CARE or CARE Plus. Additionally, BVES will create CARE Plus materials for the newly created DLI

Plus tariff schedule, such as the confirmation welcome letter, to remind customers that their Tier 1 placement is dependent on their enrollment in the program.

## **2.7 Solar**

Solar and wind customers may be further segmented into Net Energy Metering (NEM) and Distributed Generation Service (DGS) customers. Messaging will clarify how the monthly Fixed Charge will be applied and how it may impact their billing statements.

## **2.8 Integrated Campaign Tactics**

BVES plans to utilize various channels and tactics to form an integrated education and outreach campaign in support of Fixed Charge implementation, such as direct-to-customer messaging for both CARE and non-CARE customers and general customer awareness. In-language materials will be produced based on the target audience and at the request of our stakeholders, including CBOs.

## **2.9 Website**

BVES will develop and publish a dedicated webpage as the primary source of information for customers about the new Fixed Charge. The website will provide explanations of the Fixed Charge, services it covers, benefits and FAQs. More in-depth information on bill impacts will be added before direct communications are deployed. The web is an important channel to support and educate as many customers as possible and is a convenient source of self-service information. It is also a key resource to help reduce the volume of follow-up calls to BVES's Customer Care Center. When customer communications begin, web content will include segmented bill samples showing monthly totals before and after the Fixed Charge is implemented.

## 2.10 Existing Media Channels

An important and cost-effective component of the integrated marketing strategy will be using BVES's existing media channels to help deliver Fixed Charge content where applicable and appropriate, such as:

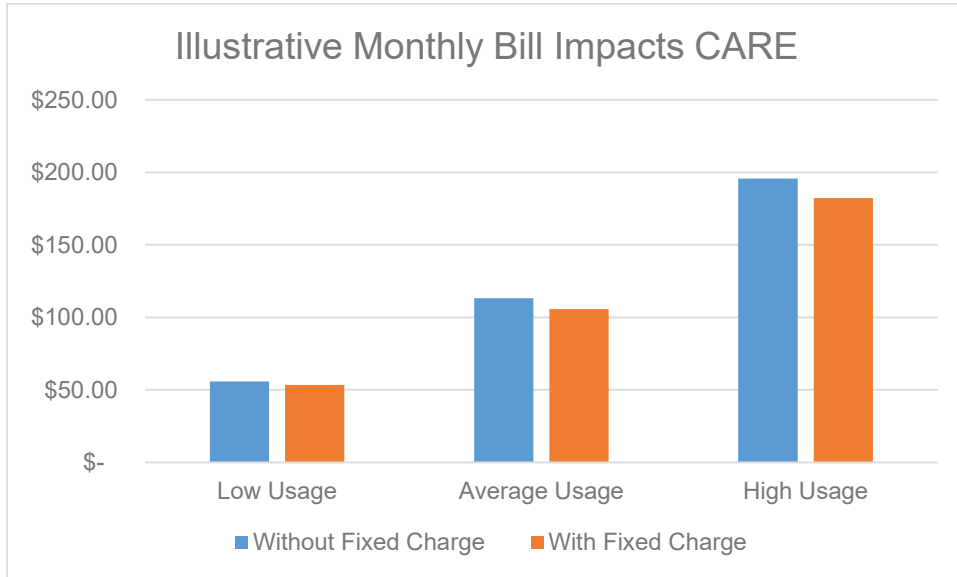
- a. **Bill Inserts:** BVES will leverage customer bill inserts prior to implementation and periodically throughout 2026. These tactics will help educate customers at the point at which they may be the most engaged. A brief explanation can guide customers to a website for more in-depth information.
- b. **Collateral:** Printed materials, such as brochures and fact sheets, will be produced for use with various customer segments and through various channels, such as outreach teams, field representatives, and CBOs. Quick-Response ("QR") Codes may be used on print materials as another opportunity to connect customers directly to the website for additional information and resources.
- c. **Organic Social:** Social media channels (i.e., Facebook, and/or YouTube) will be used as an interactive and targeted way to broadly inform customers about the Fixed Charge. Posts will be brief, clear, and easy to understand, and will guide customers to websites that contain detailed information via direct links.
- d. **Message Integration:** BVES will also identify opportunities to integrate Fixed Charge messaging into other relevant ME&O efforts. Message integration will be based on how well the audience and calls to action overlap and which channel is used. In addition, different channels will be evaluated individually for their potential to carry multiple messages. Messaging will also be integrated into planned outreach to specific target groups, such as CARE and CARE Plus.

## 2.11 Direct Notification

Direct marketing tactics will be part of specific, targeted campaigns leveraging customer segmentation data, specifically useful to reach existing CARE customers. Direct notification channels, such as direct mail, will be used to inform customers of their Fixed Charge amount and direct them online for additional information. This approach will help inform customers and satisfy their need to understand how the Fixed Charge may affect their electric bill. Sample bill detail will include examples of the three levels of Fixed Charge, point out lower kWh prices shown at low, and the potential impact.



**II. Figure 2: BVES Bill Impacts**



BVES proposes deploying multiple touchpoints throughout the customer information campaign and anticipates direct customer notification will begin approximately 9 months prior to implementation.

**2.12 Community Engagement and Outreach**

**a. Community Based Organizations**

BVES will strategically leverage its network of CBOs to help educate customers about the Fixed Charge and its implications. These organizations reflect the diverse demographics of BVES’s customer base within its service territory. Many of these CBOs are small grassroots agencies serving individuals with Access and Functional Needs (“AFN”), multicultural, multilingual, low-income, seniors, and Limited English Proficient (“LEP”) audiences. BVES will continue expanding CBO partnerships to increase the reach in its community.

**b. Employee Outreach**

ME&O activities will also include outreach and education to BVES employees prior to the implementation. Internal customer-facing groups will be leveraged to help drive early education about the Fixed Charge. Customer-facing groups include the Customer Care Center and field service teams.

### c. External Stakeholders

Information will be provided to external stakeholders, including elected officials and third-party organizations, to help them understand the origin, purpose and benefits of the Fixed Charge, enabling them to address potential questions from their constituents.

#### 2.13 Paid Media

Paid media will play a key role in supporting the customer experience through all phases of communication. Paid Search, Paid Social, and Print will help target specific key customer segments, using broad messages through diverse communication channels to maximize reach and impact. Effectively communicating the Fixed Charge through paid media channels and refining the message through the three phases will set the foundation for deeper customer engagement.

- a. **Paid Search** - Paid search text ads will appear in search engines when someone is researching the topic.
- b. **Paid Social** - Targeted paid social ads will run on platforms such as Meta (Facebook).
- c. **Print** - Print ads will run in multiple community publications throughout the Big Bear Valley.

#### 2.14 Reporting and Metrics

Once ME&O activity begins, BVES plans to measure and track key pieces of outreach data to monitor progress in reaching customers with messages about the Fixed Charge. The ME&O metrics will include:

- Number of press article mentions
- Impressions and reach of paid media
- Number and type of outbound targeted communications and bill messages
- ME&O dollars spent

#### 2.15 ME&O Budget

In this section, BVES has identified ME&O-associated costs to successfully communicate the Fixed Charge to customers. To successfully reach BVES's goals and objectives, ME&O will cost an estimated \$109,527 over the three phases.

- **Website** - BVES's proposed website activities include development and design support.
- **Collateral** – BVES's budget for supporting materials includes costs for printed fact sheets and external presentation materials, FAQ documents, and translation services. BVES anticipates providing materials in both English and Spanish, where needed.

- **Paid Media** – BVES plans to start paid media in 2025 as overarching support for the other tactics and channels. Paired with outreach through other channels, cost-effective paid media will target customers through various channels, including in-language.
- **Bill Messaging** - Anticipated costs include printed bill inserts.
- **Direct Communications** - Direct mail will be used as the primary communication method to reach both CARE and non-CARE customers. Costs include development, printing, postage, and other associated handling fees.
- **Integrated Communications** – BVES will incorporate Fixed Charge messaging into other appropriate ME&O activities and materials, based on potential for alignment of target audiences and channels with the potential to carry secondary or tertiary messages. For example, existing materials such as CARE and CARE Plus welcome letters, Medical Baseline communications, or other relevant material.

**III. Table 1: BVES Estimated ME&O Costs for Initial Fixed Charge Implementation in \$2024\***

Phase 1 (6 months: starting April 1, 2025 and ending September 30, 2025)		Awareness	BVES Cost Estimates
1	(2) Direct Mail: General Information and specific details for all rate classes (Q&A/FAQ style) front and back, single-sheet, non-glossy, all customers		\$ 33,172
2	(2) Direct Mail: CARE/MBL/AFN Customers, front side only, single sheet non-glossy		\$ 7,592
3	(2) Bill Insert: General information, all customers		\$ 3,948
4	(2) Bill Insert: CARE/MBL/AFN		\$ 1,866
5	Website Development (Conveyor Group), new landing page and IGFC details		\$ 3,600
6	(2) Direct Mail new CARE and CARE Plus Forms to all full-time residential customers		\$ 4,084
7	Collateral, printed flyers, etc.		\$ 750
8	Boosted paid digital media ads, Meta		\$ 5,000
9	Public Relations contractor support		\$ 9,750
10	IT and Rate Design Internal labor		\$ 5,400
Sub Total			\$ 75,163
Phase 2 (3 months: starting October 1, 2025 and ending December 31, 2025)		Education	BVES Cost Estimates
1	(1) Direct Mail: General Information and specific details for all rate classes (Q&A/FAQ style) front and back, single-sheet, non-glossy, all customers		\$ 16,586
2	(1) Direct Mail: CARE/MBL/AFN Customers, front side only, single sheet non-glossy		\$ 3,796
3	(1) Bill Insert: General information, all customers		\$ 1,974
4	(1) Bill Insert: CARE/MBL/AFN		\$ 933
5	(2) Direct Mail new CARE and CARE Plus Forms to all full-time residential customers		\$ 4,084
Sub Total			\$ 27,373
March 2026		Go-Live Date	
Phase 3 (6 months: starting April 1, 2026 and ending September 30, 2026 (and beyond))		Engagement	BVES Cost Estimates
1	(1) Bill Insert: General information, all customers		\$ 1,974
2	(1) Bill Insert: CARE/MBL/AFN		\$ 933
3	(1) Direct Mail: CARE/MBL/AFN Customers, front side only, single sheet non-glossy		\$ 4,084
Sub Total			\$ 6,991
Grand Total			\$ 109,527

\*Prices may vary due to timing and inflationary factors. Direct Mail estimate: all customers double-sided single sheet layout. Postage \$8,236, Print and Mail 24k customers \$5,400, Design \$2,000 + \$700 per custom graphic, \$50 per new photo stock. Bill Insert, based on 23k customers, including overrun. \$1,124, graphic design is separate. Translation Service, \$150 per.

### **2.16 ME&O Timeline**

Actual timing of ME&O activities in Phase 1 (Awareness) and 2 (Education) may be shifted or combined based on the final Fixed Charge implementation date. To ensure timely communication with customers, adjustments will be made depending on whether Fixed Charge implementation occurs in Q1 2026. Phase 3 (Engagement) may continue for up to six months after implementation.

### **2.17 ME&O Conclusion**

BVES's comprehensive ME&O plan for the Fixed Charge will provide customers with clear explanations of the new billing structure, emphasizing its necessity for reducing volumetric pricing and helping advance California's move toward greater electrification. Using integrated strategies and tactics, including targeted, direct communication for both CARE and non-Care Customers, BVES will tailor relevant messages for impacted customer groups, explaining how the Fixed Charge may impact them, while supporting the state's long-term policy goals. By actively listening to customer feedback and adapting our messaging approach through the three phases, BVES will be able to effectively guide customers through a complex topic, with the goal of building trust and long-term satisfaction with the Fixed Charge.

### **3. Tier Assignment**

- In this section, BVES outlines how Tier Assignments will be determined and billed on a monthly basis. As detailed in Section 6.1, D.24-05-028 adopts a three-tier structure for the Fixed Charges. In assigning the three tiers, D.24-05-028 specifies the following process:
- BVES will assign customers to CARE Plus (Tier 1) who attest to having eligible incomes through the CARE application process.<sup>4</sup>
- BVES will assign all customers enrolled in CARE to Tier 2 without the need for the customer to take any action.
- BVES will assign all other residential customers to Tier 3.

More detail on BVES's plan for the Tier Assignment process is included below.

#### **3.1 Tier 1 Placement, CARE Plus:**

BVES customers will have the chance to enroll in the CARE Plus program, which offers additional savings for those who qualify based on income (up to 100% of the FPL). CARE Plus customers will be assessed a \$5.00 per month Fixed Charge. If a customer's CARE Plus status changes, they will be moved into the appropriate Tier.

#### **3.2 Tier 2 Placement, CARE**

BVES will assign customers currently enrolled in the CARE program (100-200% FPL) to Tier 2 without the need for the customer to take any action. CARE customers will be assessed a \$10.06 per month Fixed Charge. If a customer's CARE status changes, they will be moved into the appropriate Tier. Customers not on CARE are not eligible to be in Tier 1 or Tier 2.

#### **3.3 Tier 3 Placement**

All other residential customers not assigned a Tier 1 or Tier 2 placement as described above will be assigned to Tier 3 and will be assessed a monthly Fixed Charge of \$23.22.

#### **3.4 Master-Metered with Sub-Metering Customers (Schedules DM and DMS)**

Domestic multi-family and Sub-Metered units that are not individually metered will be classified under Tier 3. This streamlined approach seeks to balance accuracy and cost.

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<sup>4</sup> D.24-05-028, p. 122

### **3.5 Exempt Rate Schedules**

Customers taking service on schedule TOU-EV are currently exempt from the monthly Fixed Charge.

### **3.6 Process for Managing Change in Status**

Customers who change Tier status will be moved into the appropriate Tier on their next billing cycle.

## **4. Rate Design**

ME&O to residential customers is fundamental to raising awareness, promoting understanding, and encouraging acceptance of the Fixed Charge. BVES's ME&O approach is designed to educate residential customers about how the Fixed Charge will help address equity and affordability issues, and importantly, how it sets the stage for greater adoption of electrification in California by reducing volumetric rates for all residential customers. Effective communication before, during, and after Fixed Charge implementation will be critical to providing a positive customer experience regarding the change in how they are billed for electricity.

### **4.1 Fixed Costs and Fixed Charge Levels**

This section of Appendix A provides a discussion and analysis on the fixed costs BVES proposes to be recovered through the income-graduated fixed charges. The analysis supports the fixed charges reflected in the January 16, 2024 Settlement Agreement included as Attachment C to D.24-05-028. The Small Utilities<sup>5</sup> and Cal Advocates filed a Settlement Motion for adoption of the Settlement Agreement on January 16, 2024. The Settlement Agreement proposed to primarily recover the Small Utilities' base revenue costs through income-graduated fixed charges. However, as discussed in Section 6.2 of D.24-05-028, the record of the proceeding did not include sufficient evidence about the Small Utilities' base revenue costs to determine which portion consists of fixed costs that may be recovered through a fixed charge in accordance with AB 205. Accordingly, the D.24-05-028 directed the Small Utilities to file a Tier 3 advice letter with more information about the cost categories included in base revenues and to make the determination of fixed charge levels subject to an analysis of the total revenue requirement for fixed cost categories approved in D.24-05-028.

D.24-05-028 concludes that for the large energy utilities marginal customer access costs are fixed and should be recovered through the income-graduated fixed charge. Conclusion of Law No. 7 finds that it is reasonable to define fixed costs as costs that do not directly vary based on the electricity usage of the customer from who the revenue is being collected. The marginal customer access costs represent the incremental costs of connecting an additional (i.e., marginal) customer to the grid, and is not driven by volumetric energy usage or demand. The marginal customer access costs include the marginal customer equipment costs consisting of final line transformer, service line drop, and meter costs, and the ongoing customer service costs associated with keeping customers connected to the grid. Ongoing customer costs include activities like customer billing, meter reading, and credit and collections.

### **4.2 Determination of Fixed Costs**

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<sup>5</sup> The Small Utilities include Bear Valley Electric Service, Inc. (BVES), Liberty Utilities (CalPECO Electric) and PacifiCorp.



BVES proposes to recover through its income-graduated fixed charges (“IGFC”) Marginal Customer Access costs. These are costs that vary with the number of customers, such as costs associated with providing customers access to the electric grid (e.g., meters, services, and a portion of distribution plant related to providing customers access to the electric grid) and providing basic customer services (e.g., meter reading, billing, and customer care).

BVES’ customer cost analysis shows those costs that vary with the number of residential customers represent \$44.70 per customer per month, as shown in Figure 1 (below).

**Figure 1**

<b>Customer Cost Analysis</b>	<b>Residential</b>		<b>Total</b>
	<b>Permanent</b>	<b>Non-Permanent</b>	
Customer Costs	\$ 4,090,283	\$ 8,429,876	\$ 12,520,159
Number of Customers	8,616	14,727	23,344
Customer Cost per Customer (Annual)	\$ 475	\$ 572	\$ 536
<b>Customer Cost per Customer (Monthly)</b>	<b>\$ 39.56</b>	<b>\$ 47.70</b>	<b>\$ 44.70</b>

The Figure is based on the results of BVES’s marginal cost study filed in its ongoing General Rate Case (“GRC”) proceeding in Application No. 22-08-010. The Figure shows \$12.5 million in costs that vary with the number of residential customers. Costs that vary with the number of customers include providing customers access to the electric grid and providing basic customer services, such as meter reading, billing, and customer care. The Figure also shows a monthly customer cost per residential customer of \$44.70 based on 23,344 residential permanent and non-permanent customers. Derivation of the residential cost per customer is summarized in Attachment 1.

BVES’s customer cost analysis classifies costs as customer based on two types of assignments: direct assignment and indirect assignment. Classification of costs as customer is shown in Attachment 2. The Attachment shows direct assignments utilize BVES’s financial data to assign certain plant investments as customer, such as meters, services, and a portion of distribution plant related to providing customers access to the electric grid, such as poles, overhead conductors, underground conduit, and underground conductors. The Attachment also provides an explanation of the base rate cost categories classified as customer. Classification factors used to classify costs as customer are summarized in Attachment 3.

The portion of distribution plant related to providing customers access to the electric grid was based on statistical analysis that examines over a recent 10-year period the relationship between poles, overhead conductors, underground conduit, and underground

conductors plant investment and the number of customers and non-coincident peak (NCP) demands, as shown in Attachment 4. The portion of plant that varies with number of customers was classified as customer. Direct assignments utilize BVES’s financial data to assign certain expenses as customer, such as meter reading, billing, and customer care expenses.

Indirect assignments utilized composite allocators based on direct and indirect assignments to assign certain plant investments, such as general plant, as well as certain expenses, such as administrative and general expenses.

BVES’s customer cost analysis classifies \$16.3 million (42.78 percent) of BVES’s 2023 requested base rate revenue requirement of \$38.0 million as customer. The classification process reflects 55.50 percent of BVES’s plant is classified as customer, including meters, services, and a portion of distribution plant related to providing customers access to the electric grid. The classification process also reflects 42.60 percent of BVES’s O&M expenses were classified as customer, including meter reading, customer records and collection and customer accounts. Description of the classification process for each base rate cost category is included in Attachment 2.

BVES’s analysis allocates to the residential rate class \$12.5 million (77.00 percent) of the customer portion of BVES’s revenue requirement based on the results of its marginal cost study filed in its ongoing GRC proceeding in Application No. 22-08-010. The marginal cost study reflects various methods to allocate BVES’s cost of service across rate classes, including facility investments to add new customers, number of customers, and customer demands.

**4.3 BVES’ Proposed Income-Graduated Fixed Charges**

BVES proposes in its IGFC settlement residential customer charges of \$23.22 per month for non-Care customers, \$10.06 per month for Tier 1 CARE Plus customers, and \$5.00 per month for Tier 2 CARE customers, as shown in Attachment 5. The proposed residential customer charges recover in aggregate a higher portion of BVES’s proposed revenue requirement in its GRC, as shown in Figures 2 and 3 (below).

**Figure 2: IGFC Rate Design (Residential Permanent)**

	Proposed			
	TY2023 GRC	IGFC	Change	Change
Fixed Charge Rev	\$ 938,652	\$ 1,993,450	\$ 1,054,798	112%
Usage Charge Rev	\$ 7,829,571	\$ 6,774,773	\$ (1,054,798)	-13%
Total Base Rev	\$ 8,768,223	\$ 8,768,223	\$ -	0%

Figure 2 shows the IGFC rate design increases fixed charge revenues for the residential permanent rate class by \$1.1 million, while reducing usage charge revenues by the same amount.

**Figure 3: IGFC Rate Design (Residential Non-Permanent)**

	Proposed TY2023 GRC	IGFC	Change	Change
Fixed Charge Rev	\$ 2,330,790	\$ 4,101,882	\$ 1,771,093	76%
Usage Charge Rev	\$ 15,042,302	\$ 13,271,209	\$ (1,771,093)	-12%
Total Base Rev	\$ 17,373,092	\$ 17,373,092	\$ -	0%

Figure 3 shows the IGFC rate design increases fixed charge revenues for the residential non-permanent rate class by \$1.8 million, while reducing usage charge revenues by the same amount.

To achieve BVES’s proposed revenue requirement in its GRC, as shown respectively in Figures 2 and 3 (above), BVES reduced its usage charges by 13.00 percent for residential permanent customers and 12.00 percent for residential non-permanent customers.

BVES prepared customer bill impacts to evaluate the proposed IGFC rate design, as shown in Figures 4, 5, and 6 (below).

Figure 4: Customer Bill Impacts (Non-CARE Customers)

<b>Non-Care Customers</b>						
<b>Bill Impact Analysis</b>	<b>Monthly Usage (kWh)</b>	<b>IGFC Bill \$</b>	<b>Proposed TY2023 GRC Bill \$</b>	<b>Bill Increase / (Decrease) \$</b>	<b>Bill Increase / (Decrease) %</b>	
<b>Winter Season</b>						
50% Below Avg. Usage	223.5	\$ 75.24	\$ 67.71	\$ 7.53	11.12%	
25% Below Avg. Usage	335.3	102.12	97.44	4.67	4.80%	
Average Usage	447.0	138.47	137.21	1.27	0.92%	
25% Above Avg. Usage	558.8	185.30	187.75	(2.45)	-1.30%	
50% Above Avg. Usage	670.5	232.13	238.29	(6.17)	-2.59%	
<b>Summer Season</b>						
50% Below Avg. Usage	176.9	\$ 64.38	\$ 55.69	\$ 8.69	15.61%	
25% Below Avg. Usage	265.3	84.96	78.47	6.49	8.27%	
Average Usage	353.7	107.45	103.32	4.13	4.00%	
25% Above Avg. Usage	442.1	136.42	134.99	1.43	1.06%	
50% Above Avg. Usage	530.6	173.47	174.98	(1.51)	-0.86%	
Monthly Average Usage	400.4	\$ 122.96	\$ 120.26	\$ 2.70	2.25%	

Figure 4 shows monthly bill impacts for non-CARE customers. The Figure shows bill increases under the IGFC rate design as compared to the proposed rate design in the GRC proceeding for non-Care customers who use on average 447 kWh during the winter months and 354 kWh during the summer month.

Figure 5: Customer Bill Impacts (Tier 2 CARE)

<b>CARE Rate - Tier 2</b>						
<b>Bill Impact Analysis</b>	<b>Monthly Usage (kWh)</b>	<b>IGFC Bill \$</b>	<b>Proposed TY2023 GRC Bill \$</b>	<b>Bill Increase / (Decrease) \$</b>	<b>Bill Increase / (Decrease) %</b>	
<b>Total Rates</b>						
<b>Winter Season</b>						
50% Below Avg. Usage	223.5	\$ 53.37	\$ 55.86	\$ (2.49)	-4.46%	
25% Below Avg. Usage	335.3	75.72	80.50	(4.78)	-5.93%	
Average Usage	447.0	105.65	113.15	(7.50)	-6.63%	
25% Above Avg. Usage	558.8	143.96	154.43	(10.47)	-6.78%	
50% Above Avg. Usage	670.5	182.27	195.72	(13.45)	-6.87%	
<b>Summer Season</b>						
50% Below Avg. Usage	176.9	\$ 44.33	\$ 45.89	\$ (1.56)	-3.40%	
25% Below Avg. Usage	265.3	61.46	64.79	(3.32)	-5.13%	
Average Usage	353.7	80.13	85.34	(5.21)	-6.11%	
25% Above Avg. Usage	442.1	103.98	111.35	(7.37)	-6.62%	
50% Above Avg. Usage	530.6	134.29	144.01	(9.72)	-6.75%	
Monthly Average Usage	400.4	\$ 92.89	\$ 99.25	\$ (6.36)	-6.40%	

Figure 5 shows monthly bill impacts for Tier 2 CARE customers. The Figure shows bill decreases under the IGFC rate design as compared to the proposed rate design in the GRC proceeding for Tier 2 CARE customers who use on average 447 kWh during the winter months and 354 kWh during the summer month.

Figure 6: Customer Bill Impacts (Tier 1 CARE Plus)

Care Plus Rate - Tier 1						
Bill Impact Analysis	Monthly Usage (kWh)	IGFC Bill \$	Proposed TY2023 GRC Bill \$	Bill Increase / (Decrease) \$	Bill Increase / (Decrease) %	
<b>Winter Season</b>						
50% Below Avg. Usage	223.5	\$ 48.31	\$ 55.86	\$ (7.55)	-13.52%	
25% Below Avg. Usage	335.3	70.66	80.50	(9.84)	-12.22%	
Average Usage	447.0	100.59	113.15	(12.56)	-11.10%	
25% Above Avg. Usage	558.8	138.90	154.43	(15.53)	-10.06%	
50% Above Avg. Usage	670.5	177.21	195.72	(18.51)	-9.46%	
<b>Summer Season</b>						
50% Below Avg. Usage	176.9	\$ 39.27	\$ 45.89	\$ (6.62)	-14.43%	
25% Below Avg. Usage	265.3	56.40	64.79	(8.38)	-12.94%	
Average Usage	353.7	75.07	85.34	(10.27)	-12.03%	
25% Above Avg. Usage	442.1	98.92	111.35	(12.43)	-11.16%	
50% Above Avg. Usage	530.6	129.23	144.01	(14.78)	-10.27%	
Monthly Average Usage	400.4	\$ 87.83	\$ 99.25	\$ (11.42)	-11.50%	

Figure 6 shows monthly bill impacts for Tier 1 CARE Plus customers. The Figure shows bill decreases under the IGFC rate design as compared to the proposed rate design in the GRC proceeding for Tier 1 CARE Plus customers who use on average 447 kWh during the winter months and 354 kWh during the summer month.

**4.4 Requirements of D.24-05-028 Ordering Paragraph No. 10**

Pursuant to D.24-05-028, Ordering Paragraph No. 10, BVES provides the following responses to information BVES is required to address in this filing.

**Requirement 1**

A list of all base revenue cost categories that the utility proposes to recover through its income-graduated fixed charges and the revenue requirement associated with each cost category.

**Response 1**

Please refer to Attachment 2. The Attachment provides a list of base rate cost categories and associated revenue requirement that were classified as customer and included in the income-graduated fixed charges. The Attachment shows 42.78 percent of BVES’s revenue requirement was classified as customer and included in the income-graduated fixed charges.

**Requirement 2**

An explanation of why each listed base revenue cost category is a fixed cost similar to a category approved for recovery through D.24-05-028.

**Response 2**

Please refer to Attachment 2. In general, those costs that vary with the number of customers were classified as customer and included in the income-graduated fixed charges. Costs classified as customer include providing customers access to the electric grid (e.g., meters, services, and a portion of distribution plant associated with providing customers access to the electric grid) and providing basic customer services (e.g., meter reading, billing, and customer care).

**Requirement 3**

The revenue requirement for each of the fixed cost categories approved in D24-05-028, if applicable to the utility.

**Response 3**

Please refer to Attachment 2 and BVES's response to Requirement 2.

**Requirement 4**

An explanation of how each base revenue cost category was converted from the current volumetric rate to a new per customer rate, if it is incremental to the current fixed charges.

**Response 4**

BVES proposes in its IGFC petition residential customer charges of \$23.22 per month for non-Care customers (Tier 3), \$10.06 per month for Tier 2 CARE customers, and \$5.00 per month for Tier 1 CARE Plus customers. The proposed customer charges recover in aggregate a higher portion of BVES's proposed revenue requirement than the proposed customer charges in its GRC, as shown in Figures 2 and 3 (above). Specifically, Figure 2 shows the IGFC rate design increases fixed charge revenues for the residential permanent rate class by \$1.1 million, while reducing usage charge revenues by the same amount. Figure 3 shows the IGFC rate design increases fixed charge revenues for the residential non-permanent rate class by \$1.8 million, while reducing usage charge revenues by the same amount.

To achieve a revenue neutral rate design, BVES reduced its usage charges by 13.00 percent for residential permanent customers and 12.00 percent for residential non-permanent customers, as shown respectively in Figures 2 and 3 (above).

**Requirement 5**

If a review of the base revenue cost categories shows insufficient fixed costs to support the Settlement Agreement's fixed charge levels, then the utility shall propose lower fixed charges.

**Response 5**

BVES's customer cost analysis shows a higher customer cost of \$44.70 per customer than BVES's proposed residential customer charges in its IGFC petition of \$23.22 per month for Non-Care (Tier 3) customers, \$10.06 per month for (Tier 2) CARE customers, and \$5.00 per month for (Tier 1) CARE Plus customers. The three fixed charges are proposed to be set for the implementation of the income-graduated fixed charges. These fixed charges by tier will be addressed in subsequent general rate cases for BVES.

**Requirement 6**

A bill impact analysis demonstrating that both Tier 1 and Tier 2 customers with average electricity usage in each baseline territory without changes to usage will realize a bill savings compared to currently effective rates.

**Response 6**

Customer bill impacts for Non-CARE, Tier 2 CARE, Tier 1 CARE Plus, customers are shown, respectively, in Figures 4, 5, and 6 (above). Figures 5 and 6 show that Tier 1 CARE Plus and Tier 2 CARE customers will realize a bill savings under the IGFC rate design as compared to BVES's GRC rate design.



#### 4.5 Revisions to Eligible Tariffs

BVES proposes the following changes to its residential rate design in order to comply with D.24-05-028.

BVES will implement the three tiers of Fixed Charges to be set as follows:

- CARE Plus (Tier 1): \$5.00 per month;
- CARE (Tier 2): \$10.06 per month;
- Non-CARE (Tier 3): \$23.22 per month

The fixed charge rates for low-income tiers already reflect a discount for low-income customers. No further discount will be applied to the fixed charges through the CARE program, however, the CARE discount will continue to apply to the volumetric rate. The IGFCs above are intended to apply to the initial implementation of the IGFC. Subsequent changes will be addressed in BVES GRC proceedings.

In addition to the Fixed Charges, BVES will convert the following surcharges from a volumetric rate to a fixed monthly charge for residential customers:

- Public Purpose Program (PPP)
- California Alternative Rates for Energy (CARE)
- Energy Savings Assistance (ESA)
- Catastrophic Event Memorandum Account (CEMA)

The residential fixed rate surcharges will be converted from volumetric rates to fixed monthly charges based on the actual rates in effect at the time the IGFCs are implemented and effective.

BVES provides in the Table below a summary of the Fixed Charges and Fixed Rate Surcharges by Tier. These fixed rate surcharges are updated based on current information. BVES anticipates filing a Tier 2 advice letter in 2025 to update rates as part of the IGFC implementation. The information is provided for illustrative purposes.

BVES  
Summary of Residential Net Income Graduated Fixed Charges  
Illustrative Summary Showing Settlement Base Revenue Fixed Charges Combined with Currently Effective Adjustment Rates Selected for Conversion to Fixed Charges\*

			Adjustment Rates to be Converted to Fixed Monthly Charges										
Column Formula	Dwelling Type	Income Level	Base Revenue Income Graduated Fixed Charge - Settlement	ESA	CEMA	CARE Discount	PPP	CARE Discount	CARE	CARE Discount	Total Adjustment Rates - Illustrative*	Net Income Graduated Fixed Charge - Illustrative*	
	(A)	(B)		(C)	(D)	(E)	(F)	(G)	(H)	(I)			(J)
						= (E)*20%		= (G)*20%		= (I)*20%	=Sum (D) through (L)	= (C) + (m)	
	Single Family	Up to 100% FPL Tier 1	\$5.00	(\$1.12)	\$2.34	(\$0.47)		\$0.31	(\$0.06)	\$0.00	0	\$1.00	\$6.00
		100%-200% FPL Tier 2	\$10.06	(\$1.12)	\$2.34	(\$0.47)		\$0.31	(\$0.06)	\$0.00	0	\$1.00	\$11.06
		>200% FPL Tier 3	\$23.22	(\$1.12)	\$2.34	N/A		\$0.31	N/A	\$1.10	N/A	\$2.63	\$25.85
	Average Fixed charge		\$22.21										
													(\$0.47)

\* Fixed rates for the residential adjustment schedules shown have been converted from the current volumetric rates to monthly per customer rates based on the rates in effect and test period in use at the time of this settlement (Oct-2023). The residential fixed rates for the adjustment schedules shown will be converted from volumetric rates to fixed monthly charges based on the actual adjustment rates and test period in effect at the time of the rate change effective date for this proceeding. Other volumetric adjustment schedules in effect at the time of this settlement in October 2023 which are not listed here will not be converted to fixed monthly charges.

The following tariff revisions will be incorporated:

For eligible residential rate schedules that currently display a minimum bill, this will be removed.

For eligible residential rate schedules that currently display “service charges”, this will be replaced with a Fixed Charge line item.

For eligible residential rate schedules, the service charges per meter will be updated to include Tier 1, Tier 2 and Tier 3 Fixed Charges, respectively. An illustrative representation of the residential rate schedule is provided in section 4.6, below.

Additional language will be added to the Special Conditions for applicable tariffs.

Fixed Charge Tier Determination: The Fixed Charge is a flat monthly charge that does not vary with customer usage. Tier placement will be determined by participation in CARE or CARE Plus program. CARE Plus is available to qualifying customers with incomes up to 100% of the Federal Poverty Limit (“FPL”). The CARE fixed charge is available to qualifying customers with incomes between 100% and 200% of the FPL. The Non-CARE fixed charge applies to all other customers.

#### 4.6 Illustrative Tariff Presentation of the Fixed Charge

An exemplary tariff for Residential Schedule D “Domestic Service – Single Family Accommodation” for the Rates Section is provided below. BVES filed a general rate case application (A.22-08-010) in August 2022 to establish rates for 2023 through 2026. A decision in that proceeding is still pending. BVES anticipates updating tariffs per a Tier 2 Advice Letter filing in 2025 based upon current rates at that time.

**RATES**

**SERVICE CHARGES PER METER, PER DAY**

Non-CARE - Tier 3	\$0.763
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**ENERGY CHARGES\* \$ Per kWh**

<u>SUMMER</u>	<u>Base<sup>1</sup></u>	<u>BasAdj<sup>2</sup></u>	<u>Trans<sup>3</sup></u>	<u>Supply<sup>4</sup></u>	<u>SupplyAdj<sup>5</sup></u>		<u>TOTAL</u>
Tier #1 Baseline**	\$0.12123	\$0.00000	\$0.01904	\$0.03425	\$0.01736	-	\$0.19188
Tier #2 ***	\$0.14218	\$0.00000	\$0.01904	\$0.06200	\$0.01736	-	\$0.24058
Tier #3 Remaining	\$0.16021	\$0.00000	\$0.01904	\$0.16563	\$0.01736	-	\$0.36224
<u>WINTER</u>	<u>Base<sup>1</sup></u>	<u>BasAdj<sup>2</sup></u>	<u>Trans<sup>3</sup></u>	<u>Supply<sup>4</sup></u>	<u>SupplyAdj<sup>5</sup></u>		<u>TOTAL</u>
Tier #1 Baseline**	\$0.12123	\$0.00000	\$0.01904	\$0.03425	\$0.01736	-	\$0.19188
Tier #2 ***	\$0.14218	\$0.00000	\$0.01904	\$0.06200	\$0.01736	-	\$0.24058
Tier #3 Remaining	\$0.16021	\$0.00000	\$0.01904	\$0.16563	\$0.01736	-	\$0.36224

\* Supply charges will not be applicable to direct access purchases all other charges will be assessed.

\*\* Tier #1 a Baseline allowance includes use up to 10.52 kWh/day

\*\*\* 130% of baseline allowance includes use between 10.52 kWh/day up to 13.68 kWh/day

**OTHER ENERGY CHARGES: \$ Per Month**

PPPC <sup>6</sup>	\$xx.xx
CEMA	\$xx.xx

**OTHER ENERGY CHARGES: \$ Per kWh**

Taxes & fees <sup>7</sup>	\$xx.xx
MHP BTM Capital Project	\$xx.xx
California Climate Credit	(\$ xx.xx)

**MINIMUM CHARGE**

Will be equal to the Service Charge per meter, per day

Bear Valley Electric Service Customer Charge Analysis											
Customer Costs	Total Company	Residential Permanent	Residential Non-Permanent	A1 Commercial	A2 Commercial	A3 Commercial	A4 TDU	A5 Secondary	A5 Primary	Street Lighting	
Marginal Cost of Service (Distribution-Cust) Allocation %	\$ 3,392,542	\$ 852,914	\$ 1,757,815	\$ 436,620	\$ 116,147	\$ 135,838	\$ 8,556	\$ 9,894	\$ 29,803	\$ 44,914	
Dist. Customer Revenues (Reconciled)	\$ 16,269,460	\$ 4,090,283	\$ 8,429,876	\$ 2,093,878	\$ 557,000	\$ 651,430	\$ 41,030	\$ 47,642	\$ 142,926	\$ 215,394	
Number of Customers	24,826	8,616	14,727	1,322	94	55	4	1	3	4	
Customer Cost (Annual)	\$ 637	\$ 475	\$ 572	\$ 1,584	\$ 5,952	\$ 11,862	\$ 10,257	\$ 47,642	\$ 47,642	\$ 53,849	
<b>Customer Cost (Monthly)</b>	<b>\$ 53.11</b>	<b>\$ 39.56</b>	<b>\$ 47.70</b>	<b>\$ 132.03</b>	<b>\$ 495.99</b>	<b>\$ 988.51</b>	<b>\$ 854.79</b>	<b>\$ 3,970.16</b>	<b>\$ 3,970.16</b>	<b>\$ 4,487.38</b>	

Customer Cost Analysis			
	Total Company	Residential Permanent	Residential Non-Permanent Total
Customer Costs	\$ 16,269,460	\$ 4,090,283	\$ 8,429,876
Number of Customers	46,687	8,616	14,727
Customer Cost per Customer (Annual)	\$ 536	\$ 475	\$ 572
<b>Customer Cost per Customer (Monthly)</b>	<b>\$ 44.70</b>	<b>\$ 39.56</b>	<b>\$ 47.70</b>

77.0%

Bear Valley Electric Service					Commodity			
Customer Cost Analysis		Customer		Commodity				
Total Company	Demand	Customer	Commodity	COM.%	CUS.%	DEM.%	Classifiers	Description
<b>Net Plant</b>								
1301 Mtang Org	\$ 2,522	\$ 1,121	\$ 1,401		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
1302 Mtang Fan & Consent	(25)	(11)	(14)		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
1303 Mtang Other Plant	454,861	202,226	252,635		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
3341 Gen Structure & Improvements	1,898,915	1,898,915	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3342 Gen Fuel Holders & producers	252,985	252,985	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3344 Gen Generator	2,755,548	2,755,548	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3345 Gen Assesory Electrical	2,730,774	2,730,774	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3346 Gen Misc. Power plant equipment	862,266	862,266	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3350 Trans Land & L	5,756	5,756	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3352 Trans Struc. & Improvements	(11,530)	(11,530)	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3353 Trans Station @ Generator	69,561	69,561	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3353 Trans Station	14,918,040	14,918,040	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3355 Trans Poles &	1,869,469	1,869,469	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3356 Trans OH Cond	4,235,053	4,235,053	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3357 Trans Undergrd	2,883,364	2,883,364	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
3358 Trans Undergrd	1,419,431	1,419,431	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
4360 Dist Land & Land Rights	134,988	60,014	74,974		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
4361 Dist Stru. & Improvements	2,398,021	1,066,133	1,331,888		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
4362 Dist Station E	1,781,182	1,781,182	-		0.00%	100.00%	DEM	Costs vary based on changes in demands
4364 Dist Poles Twr	19,284,562	11,828,396	7,456,166		38.66%	61.34%	Poles	Costs vary based on changes in customers and demands
4365 Dist OH Cond/D	8,995,425	4,900,865	4,094,560		45.52%	54.48%	OH-Lines	Costs vary based on changes in customers and demands
4366 Dist UG Conduit	8,076,158	4,400,082	3,676,126		45.52%	54.48%	UG-Lines	Costs vary based on changes in customers and demands
4367 Dist UG Condu/D	10,449,490	5,693,065	4,756,425		100.00%	0.00%	LineXFMRS	Costs vary based on changes in transformers
4368 Dist Ln Transf	11,732,942	11,732,942	-		100.00%	0.00%	CUS	Costs vary based on changes in customers
4369 Dist Services	713,471	-	713,471		100.00%	0.00%	CUS	Costs vary based on changes in customers
4370 Dist Meters	2,981,534	-	2,981,534		100.00%	0.00%	CUS	Costs vary based on changes in customers
4373 Dist Strt Light	322,317	-	322,317		100.00%	0.00%	CUS	Costs vary based on changes in customers
5389 General Land & La	67,642	30,073	37,569		44.46%	44.46%	DISPLT	Costs vary based on changes in distribution plant
5390 General Stru & Im	1,736,073	771,838	964,234		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
5391 General Off Furn	42,681,752	189,759	237,061		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
5392 General Trans Equ	903,147	401,529	501,618		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
5393 General Stores Eq	17,415	7,742	9,672		44.46%	44.46%	DISPLT	Costs vary based on changes in distribution plant
5394 General Tools, Sho	465,367	202,451	252,916		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
5395 General Lab Equip	(21,258)	(8,461)	(11,807)		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
5396 General Pwr Oper	476,888	212,019	264,869		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
5397 General Comm Equi	1,688,559	750,714	937,845		44.46%	44.46%	DISPLT	Costs vary based on changes in distribution plant
5398 General Misc Equi	120,409	53,533	66,877		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
5399 General Oth Tangi	(344)	(153)	(191)		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
CWIP	13,324,300	5,923,834	7,400,467		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
<b>Total Plant</b>	<b>\$ 120,432,097</b>	<b>\$ 72,565,543</b>	<b>\$ 48,055,558</b>					
	100.00%	44.46%	55.54%					
<b>Other Rate Base</b>								
Materials & Supplies	\$ 2,705,617	\$ 1,202,887	\$ 1,502,730		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
Advances for Construction	39,946	22,186	17,760		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
Contributions in Aid of Construction (CIAC)	(1,581,112)	(702,944)	(878,167)		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
Deferred Income Taxes	(13,620,667)	(6,055,595)	(7,565,072)		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
Working Cash	569,435	326,918	242,517		42.59%	57.41%	O&M	Costs vary based on changes in O&M
Common	2,217,466	985,860	1,231,605		55.54%	44.46%	DISPLT	Costs vary based on changes in distribution plant
<b>Total Other Rate Base</b>	<b>\$ (9,669,315)</b>	<b>\$ (4,225,115)</b>	<b>\$ (5,444,201)</b>					
<b>Total Rate Base</b>	<b>\$ 110,742,782</b>	<b>\$ 68,131,429</b>	<b>\$ 42,611,353</b>					
Required Rate of Return	9.050%	9.050%	9.050%					
<b>Required Operating Income</b>	<b>\$ 10,022,222</b>	<b>\$ 6,165,884</b>	<b>\$ 3,856,327</b>					



Bear Valley Electric Service		Customer		Commodity		DE.M.%		CUS.%		COM.%		Classifiers		Description	
Customer_Cost_Analysis	Total Company	Demand	Customer	Commodity	DE.M.%	CUS.%	COM.%	Classifiers	Description						
<b>Depreciation Expense</b>															
1301 Mtng Org	\$ -	-	-	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
1302 Mtng Fan & Consent	-	-	-	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
1303 Mtng Other Plant	133,003	59,132	73,872	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
3341 Gen Structure & Improvement	76,172	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3342 Gen Fuel Holders & producers	10,180	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3344 Gen Generator	107,848	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3345 Gen Assesory Electrical	109,663	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3346 Gen Misc. Power plant equipment	31,239	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3350 Trans Land & L	-	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3352 Trans Struc. & Improvements	21,538	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3353 Trans Station @ Generator	339,748	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3353 Trans Station	60,799	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3355 Trans Poles &	70,527	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3356 Trans OH Cond	38,501	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3357 Trans Undergrd	35,409	-	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
3358 Trans Undergrd	-	-	-	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
4360 Dist Land & Land Rights	50,217	22,326	27,891	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
4361 Dist Stru & Improvements	67,065	67,065	-	-	100.00%	0.00%	0.00%	DEM	Costs vary based on changes in demands						
4362 Dist Station E	476,603	292,330	184,274	-	61.34%	38.66%	0.00%	Poles	Costs vary based on changes in customers and demands						
4364 Dist Poles/Twr	200,759	109,377	91,382	-	54.48%	45.52%	0.00%	OH-Lines	Costs vary based on changes in customers and demands						
4365 Dist OH Cond/D	176,164	95,977	80,187	-	54.48%	45.52%	0.00%	UG-Lines	Costs vary based on changes in customers and demands						
4366 Dist UG Condui	311,711	169,826	141,886	-	54.48%	45.52%	0.00%	UG-Lines	Costs vary based on changes in customers and demands						
4367 Dist UG Cond/D	342,510	-	-	-	100.00%	0.00%	0.00%	LineXFMRS	Costs vary based on changes in transformers						
4368 Dist Ln Transf	29,948	-	-	-	100.00%	0.00%	0.00%	CUS	Costs vary based on changes in customers						
4369 Dist Services	922,060	-	-	-	100.00%	0.00%	0.00%	CUS	Costs vary based on changes in customers						
4370 Dist Meters	24,379	-	-	-	100.00%	0.00%	0.00%	CUS	Costs vary based on changes in customers						
4373 Dist Strt Light	24,379	-	-	-	100.00%	0.00%	0.00%	CUS	Costs vary based on changes in customers						
5389 General Land & La	60,640	26,960	33,680	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
5390 General Stru & Im	106,227	47,227	59,000	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
5391 General Off Furn	112,647	50,082	62,566	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
5392 General Trans Equ	7,449	3,312	4,137	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
5393 General Stores Eq	58,635	26,069	32,567	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
5394 General Tools, Sho	-	-	-	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
5395 General Lab Equip	-	-	-	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
5396 General Pwr Oper	-	-	-	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
5397 General Comm Equi	178,325	79,281	99,044	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
5398 General Misc Equi	9,482	4,216	5,267	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
5399 General Oth Tangl	(1,800)	(800)	(1,000)	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
<b>Total Depreciation Expense</b>	<b>\$ 4,169,271</b>	<b>\$ 1,954,723</b>	<b>\$ 2,214,547</b>	<b>\$ -</b>											
<b>Taxes Other Than Income</b>															
Property Taxes	\$ 1,423,720	632,970	790,750	-	44.46%	55.54%	0.00%	DISTPLT	Costs vary based on changes in distribution plant						
Payroll Taxes	303,717	174,367	129,350	-	57.41%	42.59%	0.00%	O&M	Costs vary based on changes in O&M						
Local Taxes	476,766	293,317	183,449	-	61.52%	38.48%	0.00%	RATEBASE	Costs vary based on changes in rate base						
<b>Total TOTI</b>	<b>\$ 2,204,204</b>	<b>\$ 1,100,654</b>	<b>\$ 1,103,550</b>	<b>\$ -</b>											
State Taxes	744,382	457,960	286,422	-	61.52%	38.48%	0.00%	RATEBASE	Costs vary based on changes in rate base						
Federal Taxes	2,170,135	1,335,115	835,019	-	61.52%	38.48%	0.00%	RATEBASE	Costs vary based on changes in rate base						
<b>Total Income Taxes</b>	<b>\$ 2,914,517</b>	<b>\$ 1,793,076</b>	<b>\$ 1,121,441</b>	<b>\$ -</b>											
<b>Total Expenses</b>	<b>\$ 28,010,159</b>	<b>\$ 15,597,027</b>	<b>\$ 12,413,132</b>	<b>\$ -</b>											
<b>Distribution Revenue Requirement</b>	<b>\$ 36,032,380</b>	<b>\$ 21,762,921</b>	<b>\$ 16,269,460</b>	<b>\$ -</b>											
<b>%</b>	<b>100.00%</b>	<b>57.22%</b>	<b>42.78%</b>	<b>0.00%</b>											

Bear Valley Electric Service				
Classification Factors	Total	Demand	Customer	Commodity
DEM	100.00%	100.00%	0.00%	0.00%
CUS	100.00%	0.00%	100.00%	0.00%
COM	100.00%	0.00%	0.00%	100.00%
Poles	100.00%	61.34%	38.66%	0.00%
OH-Lines	100.00%	54.48%	45.52%	0.00%
UG-Lines	100.00%	54.48%	45.52%	0.00%
Line&FMRs	100.00%	0.00%	100.00%	0.00%
Lines	100.00%	53.11%	46.89%	0.00%
RATEBASE	100.00%	61.52%	38.48%	0.00%
DISTPLT	100.00%	44.46%	55.54%	0.00%
OP&M	100.00%	51.26%	48.74%	0.00%
Non&M	100.00%	58.66%	41.34%	0.00%
O&M	100.00%	57.41%	42.59%	0.00%

**Lines O&M Allocation**

Account 369 Services	713,471	-	713,471	-
Account 365-67 OH & UG Lines	27,521,073	14,993,562	12,527,511	-
Total Lines	28,234,543	14,993,562	13,240,581	-
%	100.00%	53.11%	46.89%	0.00%

**Rate Base**

Total Rate Base	110,747,782	68,131,429	42,611,353	-
%	100.00%	61.52%	38.48%	0.00%



Customer-related Plant Analysis	Recorded 2011	Recorded 2012	Recorded 2013	Recorded 2014	Recorded 2015	Recorded 2016	Recorded 2017	Recorded 2018	Recorded 2019	Recorded 2020	Recorded 2021	2012-2021 Average
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<b>Gross Plant</b>												
(364) Poles, Towers, and Fixtures	14,565,784	15,396,095	15,874,679	16,673,012	17,444,977	19,763,210	20,002,796	20,222,016	20,360,871	19,229,110	20,008,217	
(365) Overhead Conductors and Devices	13,747,294	14,001,203	13,522,787	13,327,401	13,238,930	13,157,711	13,001,045	11,938,924	11,688,298	11,282,603	12,645,294	
(366) Underground Conduit	3,079,122	3,018,384	2,957,197	2,911,616	2,884,478	4,873,781	7,736,989	11,473,563	11,165,591	10,819,267	10,340,827	
(367) Underground Conductors and Devices	6,796,458	7,918,481	8,247,286	8,054,457	11,494,966	13,114,206	16,546,108	16,622,572	15,889,801	15,493,432	15,121,162	
Accounts 365-367	23,622,874	24,938,068	24,727,269	24,293,474	27,618,375	31,145,698	37,284,141	40,035,059	38,743,690	37,595,303	38,107,283	

<b>Plant Per Customer</b>												
(364) Poles, Towers, and Fixtures	634	649	667	697	738	835	831	830	835	784	814	
Accounts 365-367	1,028	1,052	1,038	1,016	1,168	1,316	1,548	1,643	1,588	1,533	1,551	

<b>Customer-Related</b>												
(364) Poles, Towers, and Fixtures	45.6%	44.5%	43.4%	41.5%	39.2%	34.6%	34.8%	34.8%	34.6%	36.9%	35.5%	38.66%
Accounts 365-367	56.2%	54.9%	55.6%	56.9%	49.5%	43.9%	37.3%	35.2%	36.4%	37.7%	37.2%	45.52%

<b>Total Customers</b>	22,969	23,709	23,815	23,912	23,643	23,671	24,085	24,363	24,398	24,521	24,570	
<b>System Non-Coincident Peak</b>	64,914	51,589	51,260	58,018	61,900	60,671	62,401	59,024	63,266	62,410	60,627	

	364	365-367
<b>Customer</b>	289	578
<b>Demand</b>	1,909	11,741
<b>Intercept</b>	(44,527,236)	(284,278,796)
<b>Coefficient</b>	1,099	3,304
<b>Standard Error</b>	1,068,102	73,303,819
<b>R-Square</b>	76.6%	81.3%
<b>F</b>	11	15
<b>df</b>	7	7
<b>Model SE</b>		
<b>SSreg</b>	2.61E+13	3.14E+14
<b>SSres</b>	7.99E+12	7.21E+13

HW Index	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
364	569	581	593	597	610	620	633	653	672	717	731	783	807	839
365	693	705	737	767	799	823	834	882	918	962	918	997	1,004	1,027
366	538	559	564	578	591	599	615	649	669	693	730	802	819	855
367	648	695	707	731	742	736	722	761	808	840	920	1,025	1,063	1,127
364	1.47	1.44	1.41	1.41	1.38	1.35	1.33	1.28	1.25	1.17	1.15	1.07	1.04	1.00
365	1.48	1.46	1.39	1.34	1.29	1.25	1.23	1.16	1.12	1.07	1.12	1.03	1.02	1.00
366	1.59	1.53	1.52	1.48	1.45	1.43	1.39	1.32	1.28	1.23	1.17	1.07	1.04	1.00
367	1.74	1.62	1.59	1.54	1.52	1.53	1.56	1.48	1.39	1.34	1.22	1.10	1.06	1.00

Indexed to 2024

**Bear Valley Electric Service  
Residential Permanent Rate Design**

Revenues	Base	Supply	Base + Supply	Other Charges	Total Rates
Target Revenues	8,768,223	\$ 3,702,106	\$ 12,470,329	303,796	12,774,124
Current Revenues	5,850,708	3,729,229	9,579,937	374,553	9,954,490
\$ Difference	2,917,515	(27,124)	2,890,391	(70,757)	2,819,635
% Difference	49.9%	-0.7%	30.2%	-18.9%	28.3%

**Residential Permanent Rate Design  
Current and Proposed Rates**

Rate Schedules 'D', 'DLS', 'D ALL E', 'DM', 'DMS - Perm', 'DMS - Life Support'	Current Billing Determinants		Current Rates		Current Revenues		Total
	Base	Supply	Base	Supply	Base	Supply	
Customer Charge	2,333,864	\$ 0.21	\$ -	\$ 490,111	\$ -	\$ 490,111	
Discount Per Unit Occupied (DMS)	96,360	(0.10000)	-	(9,636)	-	(9,636)	
Tier 1 Energy	20,780,443	0.11694	0.03425	2,430,065	711,730	3,141,795	
Tier 2 Energy	3,280,648	0.13789	0.06200	452,369	203,400	655,769	
Tier 3 Energy	7,894,586	0.15592	0.16563	1,230,924	1,307,580	2,538,504	
Transmission	31,955,677	0.01904	0.01904	-	608,436	608,436	
Supply Adjustment	31,955,677	0.00940	0.00940	-	300,383	300,383	
<b>Total Rate Schedules 'D', 'DLS', 'D ALL E', 'DM', 'DMS - Perm', 'DMS - Life Support'</b>			<b>\$ 4,593,633</b>	<b>\$ 3,131,530</b>	<b>\$ 7,725,363</b>		

**Rate Schedules 'DLI', 'DMS - Low Income'**

Customer Charge (CARE)	629,231	\$ 0.17	\$ -	\$ 105,711	\$ -	\$ 105,711
Customer Charge (CARE Plus)	5,665,206	0.09355	0.02741	529,980	155,283	685,263
Tier 1 Energy	840,458	0.11031	0.04960	92,711	41,687	134,398
Tier 2 Energy	1,385,260	0.12473	0.13251	172,783	183,561	356,344
Tier 3 Energy	7,890,924	0.01523	0.01523	-	120,179	120,179
Transmission	7,890,924	0.00752	0.00752	-	59,340	59,340
Supply Adjustment	7,890,924					
<b>Total Rate Schedules 'DLI', 'DMS - Low Income'</b>			<b>\$ 901,185</b>	<b>\$ 560,049</b>	<b>\$ 1,461,234</b>	

**Rate Schedule 'DE'**

Customer Charge	15,086	\$ 0.21	\$ -	\$ 3,168	\$ -	\$ 3,168
Tier 1 Energy	152,580	0.05848	0.01713	8,923	2,614	11,537
Tier 2 Energy	31,870	0.06896	0.03100	2,198	988	3,186
Tier 3 Energy	79,740	0.07797	0.08282	6,217	6,604	12,821
Transmission	264,189	0.00952	0.00952	-	2,515	2,515
Supply Adjustment	264,189	0.00470	0.00470	-	1,242	1,242
<b>Total Rate Schedule 'DE'</b>			<b>\$ 20,506</b>	<b>\$ 13,962</b>	<b>\$ 34,468</b>	

**Rate Schedule 'NEMR'**

Customer Charge	172,223	\$ -	\$ -	\$ -	\$ -	\$ -
Tier 1 Energy	168,800	0.28891	0.09894	48,768	16,701	65,468
Tier 2 Energy	15,228	0.28891	0.09894	4,400	1,507	5,906
Tier 3 Energy	55,393	0.28891	0.09894	16,003	5,480	21,484
Transmission	239,421	-	-	-	-	-
Supply Adjustment	239,421	-	-	-	-	-
<b>Total Rate Schedule 'NEMR'</b>			<b>\$ 69,171</b>	<b>\$ 23,688</b>	<b>\$ 92,858</b>	
Reconciliation Adjustment	40,350,211	0.00659		266,013		266,013
<b>Total Residential Permanent</b>	<b>40,350,211</b>		<b>\$ 5,850,708</b>	<b>\$ 3,729,229</b>	<b>\$ 9,579,937</b>	

**Bear Valley Electric Service**  
**Residential Permanent Rate Design**

Revenues	5.00	CARE Plus	1079
Target Revenues	10.06	CARE	90%
Current Revenues	23.22	Market	
\$ Difference			
% Difference			

Fixed Charge Rev	\$ 938,652	\$ 1,993,450	\$ 1,054,798	112%
Usage Charge Rev	\$ 7,829,571	\$ 6,774,773	\$ (1,054,798)	-13%
Total Base Rev	\$ 8,768,223	\$ 8,768,223	\$ -	0%

	GRC Proposed	IGFC	Change
Fixed Charge Rev	\$ 938,652	\$ 1,993,450	\$ 1,054,798
Usage Charge Rev	\$ 7,829,571	\$ 6,774,773	\$ (1,054,798)
Total Base Rev	\$ 8,768,223	\$ 8,768,223	\$ -

Residential Permanent Rate Design Current and Proposed Rates	Projected Billing Determinants		Proposed Rates		Proposed Revenues		Total
	Base	Supply	Base	Supply	Base	Supply	
<b>Rate Schedules 'D', 'DLS', 'D ALL E', 'DM', 'DMS</b>							
Customer Charge	2,368,173	\$ 0.33	\$ 787,398	\$ -	\$ 787,398	\$ -	787,398
Discount Per Unit Occupied (DMS)	96,360	(0.10000)	(9,636)	-	(9,636)	-	(9,636)
Tier 1 Energy	21,065,103	0.03464	3,900,210	729,598	4,629,808		4,629,808
Tier 2 Energy	3,269,859	0.06270	713,877	205,012	918,889		918,889
Tier 3 Energy	7,781,936	0.24687	1,921,104	1,303,425	3,224,529		3,224,529
Transmission	32,116,899	0.01904	-	611,506	611,506		611,506
Supply Adjustment	32,116,899	0.00940	-	301,899	301,899		301,899
<b>Total Rate Schedules 'D', 'DLS', 'D ALL E', 'DM', 'DMS'</b>			<b>\$ 7,312,952</b>	<b>\$ 3,151,440</b>	<b>\$ 10,464,392</b>		<b>\$ 10,464,392</b>

Projected Billing Determinants	Proposed Rates (IGFC)		Proposed Revenues (IGFC)		Total
	Base	Supply	Base	Supply	
2,368,173	0.76	\$ -	\$ 1,807,659	\$ -	\$ 1,807,659
96,360	(0.10000)	-	(9,636)	-	(9,636)
21,065,103	0.03464	0.03464	3,374,775	729,598	4,104,372
3,269,859	0.06270	0.18891	617,703	205,012	822,716
7,781,936	0.16749	0.21361	1,662,293	1,303,425	2,965,718
32,116,899	0.01904	0.01904	-	611,506	611,506
32,116,899	0.00940	0.00940	-	301,899	301,899
			<b>\$ 7,452,794</b>	<b>\$ 3,151,440</b>	<b>\$ 10,604,234</b>

1.91%

Customer Charge (CARE)	586,465	\$ 0.27	\$ 155,996	\$ -	\$ 155,996
Customer Charge (CARE Plus)	5,269,069	0.14812	780,439	146,050	926,489
Tier 1 Energy	789,866	0.17465	134,460	38,615	173,075
Tier 2 Energy	1,211,361	0.19748	239,225	162,324	401,548
Transmission	7,250,297	0.01523	-	110,422	110,422
Supply Adjustment	7,250,297	0.00752	-	54,522	54,522
<b>Total Rate Schedules 'DL', 'DMS - Low Income'</b>			<b>\$ 1,310,119</b>	<b>\$ 511,933</b>	<b>\$ 1,822,052</b>

527,818	0.33	\$ -	\$ 174,551	\$ -	\$ 174,551
58,646	0.16	-	9,639	-	9,639
5,269,069	0.02772	0.02772	675,299	146,050	821,349
789,866	0.05016	0.15112	116,345	38,615	154,960
1,211,361	0.13400	0.17088	206,996	162,324	369,320
7,250,297	0.01523	0.01523	-	110,422	110,422
7,250,297	0.00752	0.00752	-	54,522	54,522
			<b>\$ 1,182,831</b>	<b>\$ 511,933</b>	<b>\$ 1,694,764</b>

Customer Charge	14,721	\$ 0.33	\$ 4,894	\$ -	\$ 4,894
Tier 1 Energy	152,237	0.09259	14,096	2,637	16,733
Tier 2 Energy	31,798	0.10918	3,472	997	4,469
Tier 3 Energy	79,561	0.12345	9,822	6,663	16,485
Transmission	263,596	0.00952	-	2,509	2,509
Supply Adjustment	263,596	0.00470	-	1,239	1,239
<b>Total Rate Schedule 'DE'</b>			<b>\$ 32,284</b>	<b>\$ 14,046</b>	<b>\$ 46,330</b>

14,721	0.76	\$ -	\$ 11,236	\$ -	\$ 11,236
152,237	0.08012	0.01732	12,197	2,637	14,834
31,798	0.09447	0.03135	3,004	997	4,001
79,561	0.10682	0.08375	8,499	6,663	15,162
263,596	0.00952	-	2,509	2,509	2,509
263,596	0.00470	0.00470	-	1,239	1,239
			<b>\$ 34,936</b>	<b>\$ 14,046</b>	<b>\$ 48,982</b>

Customer Charge	177,485	\$ -	\$ -	\$ -	\$ -
Tier 1 Energy	173,964	0.45743	79,576	17,405	96,981
Tier 2 Energy	15,684	0.45743	7,179	1,570	8,749
Tier 3 Energy	57,087	0.45743	26,113	5,712	31,825
Transmission	246,745	-	-	-	-
Supply Adjustment	246,745	-	-	-	-
<b>Total Rate Schedule 'NEMR'</b>			<b>\$ 112,868</b>	<b>\$ 24,687</b>	<b>\$ 137,555</b>

177,485	0.39580	0.10005	68,855	17,405	86,261
173,964	0.10005	0.10005	6,212	1,570	7,782
15,684	0.10005	0.10005	22,595	5,712	28,307
57,087	0.10005	-	-	-	-
246,745	-	-	-	-	-
246,745	-	-	-	-	-
			<b>\$ 97,662</b>	<b>\$ 24,687</b>	<b>\$ 122,349</b>

Reconciliation Adjustment

<b>Total Residential Permanent</b>	<b>\$ 8,768,223</b>	<b>\$ 3,702,106</b>	<b>\$ 12,470,329</b>
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<b>Total Residential Permanent</b>	<b>\$ 8,768,223</b>	<b>\$ 3,702,106</b>	<b>\$ 12,470,329</b>
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**Bear Valley Electric Service  
Residential Non-Permanent Rate Design**

Revenues	Base	Supply	Base + Supply	Other Charges	Total Rates
Target Revenues	17,373,092	\$ 4,462,576	\$ 21,835,667	356,720	22,192,387
Current Revenues	12,415,627	4,323,665	16,739,493	405,675	17,145,167
\$ Difference	\$ 4,957,264	\$ 138,910	\$ 5,096,175	\$(48,955)	\$ 5,047,220
% Difference	39.9%	3.2%	30.4%	-12.1%	29.4%

**Residential Non-Permanent Rate Design  
Current and Proposed Rates**

	Current Billing		Current Rates		Current Revenues	
	Determinants	Base	Supply	Base	Supply	Total
<b>Rate Schedule 'DO'</b>						
Minimum Bill	1,042,651	\$ 0.85		\$ 886,253	\$ -	\$ 886,253
Customer Charge	4,286,968	\$ 0.21		900,263	-	900,263
Energy Charge	42,647,867	0.24089	0.07230	10,273,445	3,083,441	13,356,885
Transmission	42,647,867		0.01904	-	812,015	812,015
Supply Adjustment	42,647,867		0.00940	-	400,890	400,890
<b>Total Rate Schedule 'DO'</b>				<b>\$ 12,059,961</b>	<b>\$ 4,296,346</b>	<b>\$ 16,356,308</b>

<b>Rate Schedule 'DMS - Seasonal'</b>						
Energy Charge	271,185	0.24089	0.07230	\$ 65,326	\$ 19,607	\$ 84,933
Transmission	271,185		0.01904	-	5,163	5,163
Supply Adjustment	271,185		0.00940	-	2,549	2,549
<b>Total Rate Schedule 'DMS - Seasonal'</b>				<b>\$ 65,326</b>	<b>\$ 27,319</b>	<b>\$ 92,645</b>

Reconciliation Adjustment 42,919,052 0.00677 290,540 - 290,540

**Total Residential Non-Permanent 42,919,052 \$ 12,415,627 \$ 4,323,665 \$ 16,739,493**

**Bear Valley Electric Service**  
**Residential Non-Permanent Rate Design**

Revenues	Proposed	IGFC	% Change
Fixed Charge Rev	\$ 2,330,790	\$ 4,101,882	76%
Usage Charge Rev	\$ 15,042,302	\$ 13,271,209	-12%
Total Base Rev	\$ 17,373,092	\$ 17,373,092	0%

Residential Non-Permanent Rate Design	Projected Billing Determinants		Proposed Rates (IGFC)		Proposed Revenues (IGFC)		Total
	Base	Supply	Base	Supply	Base	Supply	
<b>Rate Schedule 'DO'</b>							
Minimum Bill	1,051,291	\$	0.85		893,598	\$	893,598
Customer Charge	4,322,493	\$	0.33	0.76	1,437,192		1,437,192
Energy Charge	44,061,982		0.33946	0.29949	14,957,090	3,184,173	18,141,264
Transmission	44,061,982		0.01904		838,940		838,940
Supply Adjustment	44,061,982		0.00940			414,183	414,183
<b>Total Rate Schedule 'DO'</b>					<b>\$ 17,287,880</b>	<b>\$ 4,437,296</b>	<b>\$ 21,725,176</b>

Residential Non-Permanent Rate Design	Projected Billing Determinants		Proposed Rates (IGFC)		Proposed Revenues (IGFC)		Total
	Base	Supply	Base	Supply	Base	Supply	
<b>Rate Schedule 'DMS - Seasonal'</b>							
Energy Charge	251,024		0.33946	0.29949	85,212	18,140	103,352
Transmission	251,024		0.01904			4,779	4,779
Supply Adjustment	251,024		0.00940			2,360	2,360
<b>Total Rate Schedule 'DMS - Seasonal'</b>					<b>\$ 85,212</b>	<b>\$ 25,280</b>	<b>\$ 110,491</b>

Reconciliation Adjustment

<b>Total Residential Non-Permanent</b>	<b>44,313,006</b>	<b>\$ 17,373,092</b>	<b>\$ 4,462,576</b>	<b>\$ 21,835,667</b>
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<b>Total Residential Non-Permanent</b>	<b>44,313,006</b>	<b>\$ 17,373,092</b>	<b>\$ 4,462,576</b>	<b>\$ 21,835,667</b>
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California  
Public Utilities  
Commission



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## CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

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**PROCEEDING: R2207005 - OIR ADVANCE DEMAND F**

**FILER: CPUC**

**LIST NAME: LIST**

**LAST CHANGED: SEPTEMBER 11, 2024**

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