



## California Public Utilities Commission

# ADVICE LETTER



ENERGIUILIII	OF CALL
MUST BE COMPLETED BY UTI	LITY (Attach additional pages as needed)
Company name/CPUC Utility No.: Bear Valley E	lectric Service, Inc. (913-E)
Utility type:  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 WATER = Water	(Date Submitted / Received Stamp by CPUC)
Advice Letter (AL) #: 495-EA	Tier Designation: Tier 3
Subject of AL: Bear Valley Electric Service, Inc.'s Inc.'s Inc.'s Paragraph 10(b) of Decision	mplementation of Income-Graduated Fixed Charges Pursuant to on 24-05-028
Keywords (choose from CPUC listing): Complian AL Type: Monthly Quarterly Annual	
If AL submitted in compliance with a Commission Decision 24-05-028	on order, indicate relevant Decision/Resolution #:
Does AL replace a withdrawn or rejected AL? I	f so, identify the prior AL: $ m _{N/A}$
Summarize differences between the AL and th	e prior withdrawn or rejected AL: $ m N/A$
Confidential treatment requested? Yes	☐ No
Confidential information will be made av	nation: Confidential vendor quotes in Appendix B vailable to appropriate parties who execute a contact information to request nondisclosure agreement/inam, regulatoryaffairs@bvesinc.com
Resolution required? Yes V No	
Requested effective date: $10/1/24$	No. of tariff sheets: $_{ m 0}$
Estimated system annual revenue effect (%):	
Estimated system average rate effect (%):	
When rates are affected by AL, include attach (residential, small commercial, large C/I, agricular	nment in AL showing average rate effects on customer classes Ultural, lighting).
Tariff schedules affected:	
Service affected and changes proposed $^{\mbox{\tiny 1:}}$ $_{N/A}$	A
Pending advice letters that revise the same tar	iff sheets: $_{ m N/A}$

## 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: <u>EDTariffUnit@cpuc.ca.gov</u>

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

Facsimile (xxx) xxx-xxxx:

Email: RegulatoryAffairs@bvesinc.com; Jeff.Linam@gswater.com

Name: Alicia Menchaca

Title: Rate Analyst, Regulatory Affairs

Utility Name: Bear Valley Electric Service, Inc.

Address: 630 E. Foothill Blvd

City: San Dimas State: California

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October 1, 2024

Advice Letter No. 495-EA

(U 913 E)

#### I. California Public Utilities Commission

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

**SUBJECT:** <u>IMPLEMENTATION OF INCOME-GRADUATED FIXED CHARGES</u> 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>

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

#### **SUPPLEMENT**

BVES is supplementing Advice Letter No. 495-E to provide additional detail regarding the anticipated costs associated with its ME&O plan. BVES has updated Appendix A, Section 2.3 and added Appendix B. This filing will replace Advice Letter No. 495-E in its entirety.

#### **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."1 Phase 1, Track A of the proceeding is scoped to address how the Commission should authorize an incomegraduated fixed charge ("Fixed Charge") in accordance with AB 205.2

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

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

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 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

Appendix B supports ME&O budget. BVES is requesting confidential treatment of vendor quotes and pricing information provided in Appendix B. This confidential information can be released to appropriate parties who execute a nondisclosure agreement. Email Jeff Linam at regulatoryaffairs@bvesinc.com to request nondisclosure agreement and access to confidential file.

#### **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.

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

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

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

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

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.

Bear Valley Electric Service, Inc.

Regulatory Affairs

E-mail: Regulatory Affairs@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

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 incomegraduated 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. 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>&</sup>lt;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>&</sup>lt;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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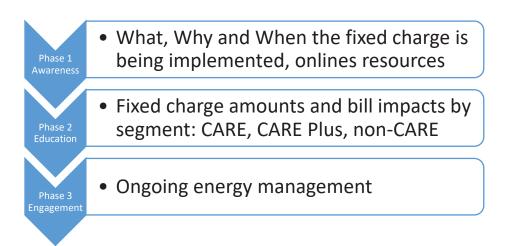
<sup>&</sup>lt;sup>3</sup> D.24-05-028, p. 122

- 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 hardto-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

#### Phase I public relations plan includes:

- 1. **Two direct mail campaigns** to all customers, informing them about IGFC and that no action is needed on their part as they will be automatically transferred to their new tariff. The campaign will also explain what IGFC is and why BVES is taking this CPUC-mandated action.
- 2. Two direct mail campaigns to all CARE, Medical Baseline, and Access and Functional Needs customers, informing them about IGFC and that no action is needed on their part as they will be automatically transferred to their new tariff. Additional information will introduce the CARE Plus program, highlighting that CARE customers who meet half of the federal poverty levels are eligible for additional savings.
- 3. **Two bill inserts** to all customers with similar information as point 1.
- 4. **Two bill inserts** to all CARE, Medical Baseline, and Access and Functional Needs customers with similar information as point 2.
- 5. **Two direct mail campaigns** sending new CARE and CARE Plus forms to all full-time residents.
- 6. Boosted paid Facebook ads specific to the Bear Valley service territory with IGFC information from points 1 and 2 above. Ten ads total spread throughout Phases 1, 2, and 3.
- 7. Develop BVES website to convey IGFC information from points 1 and 2 above.

**Phase I PR outreach** starts on April 1, 2025, and ends September 30, 2025 (6 months).

#### Phase II public relations plan includes:

- 1. **One direct mail campaign** to all customers, informing them about IGFC and that no action is required on their part, as they will be automatically transferred to their new tariff. The campaign will also explain what IGFC is and why BVES is taking this CPUC-mandated action.
- 2. One direct mail campaign to all CARE, Medical Baseline, and Access and Functional Needs customers, informing them about IGFC and that no action is required on their part, as they will be automatically transferred to their new tariff. Additional information will introduce the CARE Plus program, highlighting that CARE customers who meet half of the federal poverty levels are eligible for additional savings.
- 3. **One bill insert** to all customers with similar information as point 1.
- 4. **One bill insert** to all CARE, Medical Baseline, and Access and Functional Needs customers with similar information as point 2.

5. **Two direct mail campaigns** sending new CARE and CARE Plus forms to all full-time residents.

Phase II PR outreach starts on October 1, 2025, and ends December 31, 2025 (3 months).

#### Specific Phase III public relations plan includes:

- 6. **One bill insert** to all customers, informing them about IGFC and that no action is required on their part, as they will be automatically transferred to their new tariff. The campaign will also explain what IGFC is and why BVES is taking this CPUC-mandated action.
- 7. **One bill insert** to all CARE, Medical Baseline, and Access and Functional Needs customers, informing them about IGFC and that no action is required on their part as they will be automatically transferred to their new tariff. Additional information will introduce the CARE Plus program, highlighting that CARE customers who meet half of the federal poverty levels are eligible for additional savings.
- 8. **One direct mail campaign** sending new CARE and CARE Plus forms to all full-time residents.

**Phase III PR outreach** starts no later than April 1, 2026, and ends September 30, 2026 (6 months).

#### **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 indepth 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.

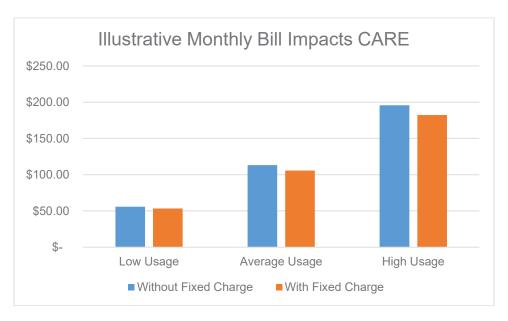
#### **2.10** Existing Media Channels

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, costeffective paid media will target customers through various channels, including inlanguage.
- 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	t Estimates
	(2) Direct Mail: General Information and specific details for all rate classes (Q&A/FAQ			
1	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	t Estimates
	(4) 5: +44 :  6			
4	(1) Direct Mail: General Information and specific details for all rate classes (Q&A/FAQ		4	46 506
1	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	t 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

<sup>\*</sup>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.

4

<sup>&</sup>lt;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**

<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

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

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 <a href="https://example.cost.org/linearized-new-marginal-cost.org/linearized

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 <a href="Attachment 2">Attachment 2</a>. 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 <u>Attachment 4</u>. 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 <a href="Attachment 5">Attachment 5</a>. 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			
	TY	'2023 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			
	Т	Y2023 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)

				Proposed		
Monthly		IGFC	T	Y2023 GRC	Bill Increase	Bill Increase /
Usage (kWh)		Bill \$		Bill \$	(Decrease) \$	(Decrease) %
223.5	\$	75.24	\$	67.71	\$ 7.53	11.12%
335.3		102.12		97.44	4.67	4.80%
447.0		138.47		137.21	1.27	0.92%
558.8		185.30		187.75	(2.45	-1.30%
670.5		232.13		238.29	(6.17)	-2.59%
176.9	\$	64.38	\$	55.69	\$ 8.69	15.61%
265.3		84.96		78.47	6.49	8.27%
353.7		107.45		103.32	4.13	4.00%
442.1		136.42		134.99	1.43	1.06%
530.6		173.47		174.98	(1.51	-0.86%
400.4	\$	122.96	\$	120.26	\$ 2.70	2.25%
	223.5 335.3 447.0 558.8 670.5 176.9 265.3 353.7 442.1	223.5 \$ 335.3 447.0 558.8 670.5  176.9 \$ 265.3 353.7 442.1 530.6	Usage (kWh)         Bill \$           223.5         \$ 75.24           335.3         102.12           447.0         138.47           558.8         185.30           670.5         232.13           176.9         \$ 64.38           265.3         84.96           353.7         107.45           442.1         136.42           530.6         173.47	Monthly Usage (kWh) Bill \$  223.5 \$ 75.24 \$ 335.3 102.12	Monthly Usage (kWh)         IGFC Bill \$         TY2023 GRC Bill \$           223.5         \$ 75.24         \$ 67.71           335.3         102.12         97.44           447.0         138.47         137.21           558.8         185.30         187.75           670.5         232.13         238.29           176.9         \$ 64.38         \$ 55.69           265.3         84.96         78.47           353.7         107.45         103.32           442.1         136.42         134.99           530.6         173.47         174.98	Monthly Usage (kWh)         IGFC Bill \$         TY2023 GRC (Decrease) \$           223.5 \$ 75.24 \$ 67.71 \$ 7.53 335.3 102.12 97.44 4.67           447.0 138.47 137.21 1.27           558.8 185.30 187.75 (2.45) 670.5 232.13 238.29 (6.17)           176.9 \$ 64.38 \$ 55.69 \$ 8.69 265.3 84.96 78.47 6.49           353.7 107.45 103.32 4.13 442.1 136.42 134.99 1.43 530.6 173.47 174.98 (1.51)

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)

CARE Rate - Tier 2							
				Proposed			
Bill Impact Analysis	Monthly	IGFC	T	Y2023 GRC	Bil	II Increase /	Bill Increase /
Total Rates	Usage (kWh)	Bill \$		Bill \$	(C	Decrease)\$	(Decrease) %
Winter Season	_						
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%
Summer Season							
50% Below Avg. Usage		\$ 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.

Care Plus Rate - Tier 1							
				Proposed			
Bill Impact Analysis	Monthly	IGFC	Т	Y2023 GRC	Bil	II Increase /	Bill Increase /
Total Rates	Usage (kWh)	Bill \$		Bill \$	(C	Decrease)\$	(Decrease) %
Winter Season	_						
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%
Summer Season	_						
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: Customer Bill Impacts (Tier 1 CARE Plus)

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 <u>Attachment 2</u>. 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 <u>Attachment 2</u>. 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.

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'

RVES

			Base Revenue Income
			Graduated Fixed
	Dwelling Type	Income Level	Charge - Settlement
Column	(A)	(B)	(C)
Formula			
	Single Family	Up to 100% FPL Tier 1	\$5.00
		100%-200% FPL Tier 2	\$10.06
		>200% FPL Tier 3	\$23.22
	Average Fixed o	charge	\$22.21

		A	djustment I	Rates	to be Conve	erted to Fixe	ed Mor	ithly Charg	es	
			CARE			CARE				Total Adjustment
ESA		CEMA	Discount	PPP		Discount	CARE		Discount	Rates - Illustrative*
	(D)	(E)	(F)		(G)	(H)		(1)	(J)	(M)
			= (E)*20%			= (G)*20%			= (1)*20%	=Sum (D) through (L)
ĺ	(\$1.12)	\$2.34	(\$0.47)		\$0.31	(\$0.06)		\$0.00	0	\$1.00
	(\$1.12)	\$2.34	(\$0.47)		\$0.31	(\$0.06)		\$0.00	0	\$1.00
	(\$1.12)	\$2.34	N/A		\$0.31	N/A		\$1.10	N/A	\$2.63

Net Income
Graduated Fixed
Charge - Illustrative*
(N)
= (C) + (m)
\$6.00
\$11.06
\$25.85

<sup>\*</sup> 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 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.

(\$0.47)

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

#### ENERGY CHARGES\* \$ Per kWh

SUMMER	Base <sup>1</sup>	BasAdj <sup>2</sup>	Trans <sup>3</sup>	Supply <sup>4</sup>	SupplyAdj⁵		TOTAL
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
WINTER	Base <sup>1</sup>	BasAdj <sup>2</sup>	Trans <sup>3</sup>	Supply <sup>4</sup>	SupplyAdj5		TOTAL
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	<del>\$0.01736</del>	-	<del>\$0.36224</del>

 $<sup>\</sup>underline{*} \ \underline{Supply} \ \underline{charges} \ \underline{will} \ \underline{not} \ \underline{be} \ \underline{applicable} \ \underline{to} \ \underline{direct} \ \underline{access} \ \underline{purchases} \ \underline{all} \ \underline{other} \ \underline{charges} \ \underline{will} \ \underline{be} \ \underline{assessed}.$ 

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

PPPC6	\$xx.xx
CEMA	\$xx.xx
OTHER ENERGY CHARGES	8: \$ Per kWh
Taxes & fees <sup>7</sup>	\$xx.xx

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

#### MINIMUM CHARGE

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

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

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

#### **DECLARATION OF CONFIDENTIALITY**

I, Paul Marconi, declare as follows under penalty of perjury:

- 1. I am an officer of Bear Valley Electric Service, Inc. ("BVES"), and as such duly authorized to declare documents and information submitted to the California Public Utilities Commission ("Commission") to be confidential under General Order 66-D.
- 2. The following person may be contacted regarding the potential release of the confidential information identified by this Declaration:

Name: Jeffrey T. Linam Email: regulatoryaffairs@bvesinc.com

3. The documents attached hereto, **Advice Letter 495-EA**, specifically:

#### Appendix B

include confidential information that is protected under California Public Utilities Code Section 583.

- 4. All pages that include confidential information in these documents are separately marked as confidential. If only certain information in these documents is confidential, then only that information is marked as confidential.
- 5. These documents include information protected by the trade secrets privilege pursuant to California Evidence Code Section 1060 as defined in Civil Code Section 3426.1(d), Penal Code Section 499c(a)(9), and Government Code 7927.705. Specifically, the protected information includes: Confidential information of economic value and/or commercially sensitive information which may result in potential competitors to use such information to gain an unfair competitive advantage in future transactions.
- 6. This protected information derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use. Golden State does not disclose this information to other parties or agencies without assurance that it will be protected from disclosure, and exercises reasonable efforts to protect its secrecy.

7. I have personally authorized the markings of confidentiality within these documents and if called upon, I could and would testify competently as to their justification and basis.

Sworn to this 1st day of October, at Big Bear Lake, California.

Paul Digitally signed by Paul Marconi Date: 2024.10.01 14:43:14 -07'00'

Paul Marconi President Bear Valley Electric Service, Inc. 42020 Garstin Dr. PO Box 1547 Big Bear Lake, CA 92315

October 1, 2024

# APPENDIX B

**Pricing Documentation** 

Service	File Name	Price
Translation Service	Transperfect Invoice	per language
Direct Mailer Design	Design for direct mailer	per design
Direct Mailer Print and Postage Qty 23,500	Individual Mailer Printing and Postage	Printing: Postage:
Social Media (boosted post)	Boosted post pricing	per post
Webpage design	Conveyor website design	cost of one webpage design
Direct Mail Qty 25,524 (includes overrun)	KUBRA	



Trans./Edit/Proof.

ZAPATECO Trans./Edit/Proof.

# Please note that our address has changed

#### Bill To:

Bear Valley Electric Service, Inc. Attn: Natali Orrick 42020 Garstin Dr Big Bear Lake, CA 92315 USA

#### Requested By:

Natali Orrick Bear Valley Electric Service, Inc. 42020 Garstin Dr Big Bear Lake, CA 92315 USA

Invoice #:		Sales Contact:	Eric Schultz	@transperfect.com)
Invoice Date:	09/22/2020	Payment Terms:	Net 30	
Invoice Due:	10/22/2020			
Contract #:	US08	Purchase Order #:		
Project Notes: Wildfire Translation	18			

Description	Quantity	Unit	Unit Cost(US\$)	Extended Cost(US\$)
English into Spanish (US) Trans./Edit/Proof.	1.00	Minimum		
English into French (FR)				

Trans./Edit/Proof. 1.00 Minimum **English into Chinese (T-US)** Trans./Edit/Proof. 1.00 Minimum **English into Vietnamese** Trans./Edit/Proof. 1.00 Minimum **English into Tagalog** Trans./Edit/Proof. 1.00 Minimum **MIXTECO** 

Project Management

1.00 Flat

Total to Bill This Contract: US

Tax Amount:

Total Amount Due:

1.00

1.00

Flat

Flat





Public Advertising Agency, Inc. 31915 Rancho California Rd, Suite 200-412 Temecula, CA 92591

Credit Card Payments will appear as Public Advertising Agency

Invoice #

Invoice Date: Sunday, September 11th, 2022 Due Date: Wednesday, September 21st, 2022

#### **Invoiced To**

Bear Valley Electric Services, Inc ATTN: Bear Valley Electric Services, Inc 42020 Garstin Drive P.O. Box 1547 Big Bear Lake, , 92315 United States

Purchase Order: PO

Description	Total
Design of Summer/Current 2022 newsletter - general advertising	USD
Sub Total	USD
Credit	\$0.00 USD
Total	USD

#### **Transactions**

Transaction Date	Gateway	Transaction ID	Amount		
	No Related Transactions Found				
		Balance	USD		

PDF Generated on Sunday, September 11th, 2022

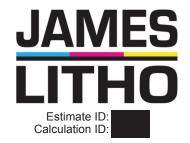
August 12, 2024

Bear Valley Electric Service



Accounts Payable

Big Bear Lake, CA 92315





We thank you for your inquiry. Please find our proposal for:

Project Name: Postcard

Variant Description: Variant - 2 Runs
Files Supplied: Certified PDF
Proof: Digital Color Proof

Part: Sheet Pages: 2

Size: Finished: 6 x 9 "
Color: Two sided CMYK + AQ

Paper: 100# Pacesetter Cover Gloss White Finishing: Trim, inkjet address, prep and mail

Packaging: Carton Pack

Shipping: FOB James Litho

Price for 23,500 pcs. Price for 47,000 pcs.



Terms of Payment: 30 Days Net

The pricing above is based on information provided by the client about the project. Actual costs may change if the project does not reflect the specifications above. James Litho will notify the client of any changes in costs prior to production. If you have any questions or comments concerning the content of this letter, please do not hesitate to contact me directly.

Yours sincerely,

**Bryan James** 

@jameslitho.com)



#### **Boosted Post Strategy**

Title of Boosted Post: Customer Service Service	upervisor	
Employment Opportunity		
Button: Learn More	Website	Link:
Audience: 40.8K - 48K	1	
Location Ranges:	Age: 18-	
<ul> <li>42020 Garstin Dr, Big Bear Lake, CA + 15 r</li> </ul>	ni	
Other targeting: N/A	*	
Daily Reach: Pending tier decision (see	Day Span: 14 days	Budget: Pending tier decision (see
below)	40 - 30	below)

#### Tier Option Table (select one):

Tier Options	Cost	Daily Reach	Total Projected Reach
Tier 1		1K - 2.9K	
Tier 2		1.9K - 5.4K	
Tier 3		2.6K - 7.5K	

Best,

**Noah Rodriguez** Account Executive

(916) 579-2887 Website www.randlecommunications.com Address 2277 Fair Oaks Blvd Suite 350 Sacramento, CA 95825



CONFIDENTIAL MATERIALS protected under Cal. Gov. Code 7927.705, Cal. Evid. Code §1060, Civ. Code §3426.1(d), Penal Code §499c(a)(9), and Pub. Util. Code §583.

#### Franklin Lee Enterprises, L.L.C.

2419 Imperial Business Park Drive Imperial, CA 92251 +1 7603551500

②conveyorgroup.com

www.conveyorgroup.com



#### INVOICE

BILL TO

Laura Martinez Bear Valley Electric Service, Inc.

A/P 630 E. Foothill Blvd.

San Dimas, CA 91773-9016

INVOICE DATE TERMS DUE DATE

05/06/2024 Net 30 06/05/2024

#### PROJECT NUMBER(S)

DATE	ACTIVITY	DESCRIPTION		QTY	RATE	AMOUNT
04/30/2024	Web Development Services	Contract # Development - va Content and Des including WMP/F CTA		6.50		
Thank you for choosing	us, to be a part of your critical Com	munications team!	SUBTOTAL			
			TAX			0.00
			TOTAL			
			BALANCE DUE			

CONFIDENTIAL MATERIALS protected under Cal. Gov. Code 7927.705, Cal. Evid. Code §1060, Civ. Code §3426.1(d), Penal Code §499c(a)(9), and Pub. Util. Code §583.

#### Franklin Lee Enterprises, L.L.C.

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#### INVOICE

BILL TO

Laura Martinez Bear Valley Electric Service, Inc.

A/P

630 E. Foothill Blvd.

San Dimas, CA 91773-9016

INVOICE DATE TERMS DUE DATE

06/12/2024 Net 30 07/12/2024

PROJECT NUMBER(S)

DATE	ACTIVITY	DESCRIPTION		QTY	RATE	AMOUN'
05/31/2024	Web Development Services	Contract # On-Going Development - various CMS, Content and Design updates - EV CTA		15	120.00	
Thank you for choosing us, to be a part of your critical Communications team!						
hank you for choosing	us, to be a part of your critical Comi	munications team!	SUBTOTAL			
hank you for choosing	us, to be a part of your critical Comi	munications team!	SUBTOTAL TAX			0.00
hank you for choosing	us, to be a part of your critical Comi	munications team!				0.0

#### Franklin Lee Enterprises, L.L.C.

2419 Imperial Business Park Drive Imperial, CA 92251 +17603551500

@conveyorgroup.com www.conveyorgroup.com



#### **INVOICE**

BILL TO

Laura Martinez
Bear Valley Electric Service, Inc.

A/P 630 E. Foothill Blvd.

San Dimas, CA 91773-9016

INVOICE DATE TERMS DUE DATE

06/30/2024 Net 30 07/30/2024

#### PROJECT NUMBER(S)

DATE	ACTIVITY	DESCRIPTION		QTY	RATE	AMOUNT
06/30/2024	Web Development Services	Contract # Development - v Content and Des	, On-Going arious CMS, sign updates - EV	13		
06/30/2024	Web Development Services	Contract # Development - v Content and Des		7		
Thank you for choosing us, to be a part of your critical Communications team!			SUBTOTAL			
			TAX			0.00
			TOTAL			
			BALANCE DUE			

Sent: Thursday, June 13, 2024 9:41 AM **To:** Rogers, Darlene < D @gswater.com> Cc: Delia Rocha < @kubra.com>; Christina Xenias < @kubra.com; Patty Martinez @kubra.com>; KUBRA Client Support <</pre> @kubra.com>; Medina-Stephens, Gabrielle < @gswater.com> Subject: Re: FW: Provide Quote for Bear Valley Bill Insert 2024 BVESI Summer Newsletter This Message Is From An External Sender This message came from outside the company. Do not open any attachments unless you expected this message. Do not click links unless you are sure they are safe. Hi Darlene. The cost to produce and deliver these inserts would be \$108.93/M (\$2857.23 for 26,230 units) Thank you, On Tue, Jun 11, 2024 at 1:15 PM Rogers, Darlene < <u>DMROGERS@gswater.com</u>> wrote: Thank you **Darlene Rogers** Oracle CC&B Billing Systems Analyst Golden State Water Company (909) 394-3600 ext. 608 @aswater.com From: Brian Silva @kubra.com> **Sent:** Tuesday, June 11, 2024 1:11 PM To: Rogers, Darlene @gswater.com> Cc: Delia Rocha @kubra.com>; Christina Xenias @kubra.com; Patty Martinez @kubra.com>; KUBRA Client Support <</pre> @kubra.com>; Medina-Stephens, @gswater.com> Gabrielle Subject: Re: FW: Provide Quote for Bear Valley Bill Insert 2024 BVESI Summer Newsletter This Message Is From An External Sender This message came from outside the company. Do not open any attachments unless you expected this message. Do not click links unless you are sure they are safe. Hi Darlene, I should have a quote for you within 24 hours **Thanks** 

On Tue, Jun 11, 2024 at 10:57 AM Rogers, Darlene

<u>@gswater.com</u>> wrote:

Thank you

#### BEAR VALLEY ELECTRIC SERVICE, INC.

#### G.O. 96-B

#### **SERVICE LIST**

AGNES ROBERTS, FINANCIAL ANALYST <u>AGNES.ROBERTS@BBCCSD.ORG</u> EMAIL ONLY CITY CLERK CITY OF BIG BEAR LAKE 39707 BIG BEAR BLVD. P.O. BOX 10000 BIG BEAR LAKE, CA 92315

CITY ATTORNEY CITY OF BIG BEAR LAKE 39707 BIG BEAR BLVD. P.O. BOX 10000 BIG BEAR LAKE, CA 92315 COUNTY CLERK COUNTY OF SAN BERNARDINO 385 N. ARROWHEAD AVENUE –  $2^{ND}$  FLOOR SAN BERNARDINO, CA 92415-0140

COUNTY COUNSEL COUNTY OF SAN BERNARDINO 385 N. ARROWHEAD AVENUE – 2<sup>ND</sup> FLOOR SAN BERNARDINO, CA 92415-0140 ASST ATTORNEY GENERAL OFFICE OF THE ATTORNEY GENERAL STATE OF CALIFORNIA 300 SOUTH SPRING STREET LOS ANGELES, CA 90013

ERIC JANSSEN
ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVE., STE. 400
SACRAMENTO, CA 95816-5905
ERICJ@ESLAWFIRM.COM

WADE REESER, VP, OPERATIONS BIG BEAR MOUNTAIN RESORTS P.O. BOX 77, 880 SUMMIT BLVD. BIG BEAR LAKE CA 92315 WREESER@MAMMOTHRESORTS.COM

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MIKE LONG
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SOUTH LAKE TAHOE, CA 96150
MIKE.LONG@LIBERTY-ENERGY.COM

RANDLE COMMUNICATIONS
500 CAPITOL MALL, SUITE 1950
SACRAMENTO, CA 95814
MGAZDA@RANDLECOMMUNICATIONS.COM

ITZIAR ROMO OPR COMMUNICATIONS 19318 JESSE LANE, SUITE 200 RIVERSIDE, CA 92508 IROMO@OPRUSA.COM FRED YANNEY, YANNEY LAW OFFICE 2082 MICHELSON DRIVE, SUITE 100 IRVINE, CA 92612 FREDYANNEY@GMAIL.COM BRENT TREGASKIS BEAR MOUNTAIN RESORT P O BOX 77 BIG BEAR LAKE, CA 92315

SOUTHERN CALIFORNIA EDISON CO. P. O. BOX 800 ROSEMEAD, CA 91770 PATRICK O'REILLY OPR COMMUNICATIONS 19318 JESSE LANE, SUITE 200 RIVERSIDE, CA 92508 POREILLY@OPRUSA.COM

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OPR COMMUNICATIONS
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mday@DowneyBrand.com

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WILLIAM A. MONSEN MRW & ASSOCIATES, LLC 1736 FRANKLIN STREET, SUITE 700 OAKLAND, CA 94612 WAM@MRWASSOC.COM



**CPUC Home** 

## CALIFORNIA PUBLIC UTILITIES COMMISSION **Service Lists**

PROCEEDING: R2207005 - OIR ADVANCE DEMAND F

**FILER: CPUC** LIST NAME: LIST

LAST CHANGED: SEPTEMBER 20, 2024

### **Parties**

CARMEN BEST VP - POLICY & EMERGING MARKETS RECURVE ANALYTICS, INC. EMAIL ONLY EMAIL ONLY, CA 00000 FOR: RECURVE ANALYTICS, INC.

RICHARD TABORS, DR. PRINCIPAL TABORS CARAMANIS RUDKEVICH 300 WASHINGTON STREET NEWTON, MA 02458 FOR: TABORS CARAMANIS RUDKEVICH

C. BAIRD BROWN

ATTORNEY ECO(N)LAW LLC 230 S. BROAD STREET, 17TH FL. PHILADELPHIA, PA 19102

SAMUEL GODA MGR - POLICY & GOV AFFAIRS KALUZA US LLC 3210 NEWARK ST NW WASHINGTON, DC 20008 FOR: KALUZA US LLC

JEANNE B. ARMSTRONG SR. COUNSEL - REGULATORY SOLAR ENERGY INDUSTRIES ASSOCIATION EMAIL ONLY SACRAMENTO, CA 00000 FOR: SOLAR ENERGY INDUSTRIES ASSOCIATION

BRADY BORCHERDING DIR - GOVERNMENT AFFAIRS- WEST COAST FUELCELL ENERGY, INC. 3 GREAT PASTURE ROAD DANBURY, CT 06810 FOR: FUELCELL ENERGY, INC.

EMILIE OLSON PRINCIPAL ADVANCED ENERGY UNITED, INC. 1010 VERMONT AVE., NW, STE. 1050 WASHINGTON, DC 20005 FOR: MICROGRID RESOURCES COALITION (MRC) FOR: ADVANCE ENERGY UNITED, INC. (FORMERLY ADVANCED ENERGY ECONOMY)

> KENNETH D, SCHISLER REGULATORY AND GOVERNMENT AFFAIRS CPOWER 1001 FLEET STREET, SUITE 400 BALTIMORE, MD 21202 FOR: CPOWER

LARISA DOBRIANSKY CONSULTANT DOBRIANSKY CONSULTANCY DOBRIANSKY CONSULTANCY
ARMADA POWER, LLC

1016 SOUTH WAYNE STREET, UNIT 606

230 WEST STREET, SUITE 150

ARLINGTON, VA 22204
COLUMBUS, OH 43215 FOR: GRID2.0

MEREDITH ROBERTS FOR: GENERAC POWER SYSTEMS, INC. FOR: ENCHANTED ROCK

JACOB SCHLESINGER COUNSEL KEYES & FOX LLP 1580 LINCOLN ST., STE. 1105 DENVER, CO 80203 FOR: SAN DIEGO COMMUNITY POWER (SDCP) FOR: ENERGY WEB AND CLEAN ENERGY ALLIANCE (CEA)

ERIC A. GRESSLER SR COUNSEL - REGULATORY SR COUNSEL - REGULATORY

SOUTHERN CALIFORNIA GAS COMPANY

555 WEST FIFTH ST., STE. 1400, GT-14E7

11835 W. OLYMPIC BLVD., STE. 900E LOS ANGELES, CA 90013 LOS ANGELES, CA 90064 FOR: SOUTHERN CALIFORNIA GAS COMPANY FOR: EVGO SERVICES, LLC

DANIEL W. DOUGLASS ATTORNEY

JAMES WHOOLEY ATTORNEY SOUTHERN CALIFORNIA EDISON COMPANY

2244 WALNUT GROVE AVE. / PO BOX 800

ROSEMEAD, CA 91770

SA ANALISI, REGULATORI

BEAR VALLEY ELECTRIC SERVICE

630 EAST FOOTHILL BOULEVARD

SAN DIMAS, CA 91773 ROSEMEAD, CA 91770

JANE KRIKORIAN, J.D. MGR - REGULATORY UTILITY CONSUMERS' ACTION NETWORK

404 EUCHID AVE., STE. 377

SAN DIEGO, CA 92114

SAN DIEGO, CA 92123 FOR: UTILITY CONSUMERS€™ ACTION NETWORK FOR: SAN DIEGO GAS AND ELECTRIC COMPANY

KATHLEEN MCMANUS GOVERNMENT AND REGULATORY AFFAIRS FOR: ARMADA POWER, LLC

SCOTT D. LIPTON DIR - REGULATORY, WEST

GENERAC POWER SYSTEMS, INC.

S45W29290 HIGHWAY 59

WAUKESHA, WI 53189

SCOTT B. ETTON

ENERGY POLICY MGR, WESTERN REGION

ENCHANTED ROCK, LLC

1113 VINE STREET, STE. 101

HOUSTON, TX 77002

> JESSE MORRIS CHIEF EXECUTIVE OFFICER ENERGY WEB 201 MAIN ST., SUITE 202D CARBONDALE, CO 81623

NOAH GARCIA MGR LOS ANGELES, CA 90064

MICHAEL KOHANIM CEO DOUGLASS, LIDDELL & KLATT

5737 KANAN ROAD, STE. 610

AGOURA HILLS, CA 91301-1601

FOR: GOOGLE NEST

UNIVERSAL DEVICES

5435 BALBOA BLVD. SUITE 205

ENCINO, CA 91316

RONALD MOORE SR ANALYST, REGULATORY SAN DIMAS, CA 91773 FOR: SOUTHERN CALIFORNIA EDISON COMPANY FOR: BEAR VALLEY ELECTRIC SERVICE, INC.

> REBECCA HANSSON SENIOR ATTORNEY

JONATHAN HART MGR - PUBLIC POLICY POWERFLEX 15445 INNOVATION DRIVE SAN DIEGO, CA 92128 FOR: POWERFLEX INC.

JENNIFER HAMILTON DEPUTY DIR CALIFORNIA HYDROGEN BUSINESS COUNCIL CLEAN COALITION 18847 VIA SERENO 1800 GARDEN STREET YORBA LINDA, CA 92866 SANTA BARBARA, CA 93101 FOR: CALIFORNIA HYDROGEN BUSINESS FOR: CLEAN COALITION COUNCIL

BRIAN ALWARD VP OF SALES AND MARKETING

DAVID MEYERS CEO GRIDTRACTOR INC. 2600 SOMERSET DRIVE BELMONT, CA 94022 FOR: GRIDTRACTOR INC.

FOR: TEMIX INC.

MELICIA CHARLES

MEGAN DELAPORTA CALIF PUBLIC UTILITIES COMMISSION LEGAL DIVISION AREA 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214 FOR: PUBLIC ADVOCATES OFFICE

JENNIFER L. WEBERSKI LITIGATION SUPERVISOR

CHIEF BUSINESS DEV. OFFICER NOSTROMO ENERGY, INC. 3333 MICHELSON, STE. 300 IRVINE, CA 92612 FOR: NOSTROMO ENERGY, INC.

BEN SCHWARTZ MGR - POLICY

JERRI STRICKLAND VP OF SALES AND MARKETING
POLICY ADVISOR
POLARIS ENERGY SERVICES
CENTRAL COAST COMMUNITY ENERGY
411 WOODBRIDGE STREET
70 GARDEN COURT, SUITE 300
SAN LUIS OBISPO, CA 93401
MONTEREY, CA 93940
FOR: POLARIS ENERGY SERVICES
FOR: CENTRAL COAST COMMUNITY ENERGY POLICY ADVISOR (CCCE)

> EDWARD G. CAZALET, PH.D. CEO TEMIX INC. 221 MAIN STREET, SUITE 360 LOS ALTOS, CA 94023

RACHAEL KOSS DIR - REGULATORY AFFAIRS, WEST

MAINSPRING ENERGY, INC.

3601 HAVEN AVENUE

MENLO PARK, CA 94025

FOR: MAINSPRING ENERGY, INC.

RACHAEL KOSS

ATTORNEY

ADAMS BROADWELL JOSEPH & CORDOZO

501 GATEWAY BLVD., STE. 1000

SOUTH SAN FRANCISCO, CA 94080

FOR: COALITION OF CALIFORNIA UTILITY EMPLOYEES

> MATTHEW FREEDMAN STAFF ATTORNEY
> THE UTILITY REFORM NETWORK 785 MARKET STREET, 14TH FL SAN FRANCISCO, CA 94103
> FOR: THE UTILITY REFORM NETWORK (TURN)

> > MOHIT CHHABRA SR. SCIENTIST

SMALL BUSINESS UTILITY ADVOCATES

NATURAL RESOURCES DEFENSE COUNCIL

111 SUTTER STREET, 21ST FL.

SAN FRANCISCO, CA 94104

FOR: SMALL BUSINESS UTILITY ADVOCATES

FOR: NATURAL RESOURCES DEFENSE COUNCIL

RACHEL MCMAHON VICE PRESIDENT, POLICY CALIFORNIA ENERGY STORAGE ALLIANCE EMAIL ONLY EMAIL ONLY, CA 94104 FOR: CALIFORNIA ENERGY STORAGE ALLIANCE FOR: VALLEY CLEAN ENERGY ALLIANCE

SHERIDAN PAUKER ATTORNEY

KEYES & FOX LLP 580 CALIFORNIA STREET, 12TH FLOOR

SAN FRANCISCO, CA 94104

STEVE SHERR FOUNDATION WINDPOWER, LLC 268 BUSH STREET SUITE 3100 SAN FRANCISCO, CA 94104 SAN FRANCISCO, CA 94104
FOR: FOUNDATION WINDPOWER, LLC

JAMES D. SQUERI ATTORNEY DOWNEY BRAND LLP 455 MARKET STREET, STE. 1500 SAN FRANCISCO, CA 94105 FOR: CALIFORNIA BUILDING INDUSTRY ASSOCIATION

MICHAEL COLVIN DIR - REGULATORY SAN FRANCISCO, CA 94105

NORA SHERIFF COUNSEL ENVIRONMENTAL DEFENSE FUND

123 MISSION ST, 28TH FL.

SAN FRANCISCO, CA 94105

BUCHALTER, A PROFESSIONAL CORPORATION
425 MARKET STREET, 29TH FLR
SAN FRANCISCO, CA 94105–2491 FOR: ENVIRONMENTAL DEFENSE FUND FOR: CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION (CLECA) / ENERGY PRODUCERS AND USERS COALITION

CLIFF STATON HEAD OF GOV'T AFFAIRS

EDWARD G. POOLE ATTORNEY ONMECONNECT, INC.

ANDERSON POOLE & COUCHE

350 TOWNSEND ST. SUITE 210

SAN FRANCISCO, CA 94107

FOR: OHMCONNECT, INC.

SOURCE STREET, STE. 742

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