

PUBLIC UTILITIES COMMISSION  
505 Van Ness Avenue  
San Francisco CA 94102-3298



**Bear Valley Electric Service, Inc.**  
**ELC (Corp ID 913)**  
**Status of Advice Letter 451E**  
**As of October 6, 2022**

Subject: Submetering Protocol Implementation Memorandum Account

Division Assigned: Energy

Date Filed: 09-06-2022

Date to Calendar: 09-09-2022

Authorizing Documents: D2208024

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>09-06-2022</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Nguyen Quan

(909) 394-3600 X664

[RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com)

**PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**



# 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: Nguyen Quan

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) #: 451-E

Tier Designation: 1

Subject of AL: Submetering Protocol Implementation Memorandum Account

Keywords (choose from CPUC listing): Compliance, Preliminary Statement, Tariffs

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision No. 22-08-024

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

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

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

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

Resolution required?  Yes  No

Requested effective date: 9/6/22

No. of tariff sheets: 2

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: Preliminary Statement ZZ, Table of Content

Service affected and changes proposed<sup>1</sup>: see Advice Letter

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: Nguyen Quan  
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](mailto:RegulatoryAffairs@bvesinc.com); [nquan@gswater.com](mailto:nquan@gswater.com)

Name: Ronald Moore  
Title: Analyst, Regulatory Affairs Dept.  
Utility Name: Bear Valley Electric Service, Inc  
Address: 630 E. Foothill Blvd  
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Telephone (xxx) xxx-xxxx: (909) 394-3600 x682  
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Email: [RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com); [ronald.moore@gswater.com](mailto:ronald.moore@gswater.com)

Clear Form



Bear Valley Electric Service, Inc.  
P.O. Box 9028  
San Dimas, CA 91773-9028  
A Subsidiary of American States Water Company

September 6, 2022

Advice Letter No. 451-E

(913 E)

## California Public Utilities Commission

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

**SUBJECT:** *Submetering Protocol Implementation Memorandum Account*

### **PURPOSE**

In compliance with California Public Utilities Commission ("Commission") Decision ("D.") 22-08-024, dated August 4, 2022, BVES hereby submits the following Tier 1 Advice Letter to establish a Submetering Protocol Implementation Memorandum Account ("SPIMA"). The effective date of the SPIMA shall be September 6, 2022.

D.22-08-024 adopts a plug-in electric vehicle submetering protocol ("EVSMP") and requires the utilities to implement the submetering protocol for all customers with plug-in electric vehicles and customer-owned submeters. This decision also adopts electric vehicle supply equipment communication protocols ("EVSECP") applying to electric vehicle supply equipment deployed through future transportation electrification efforts. Pursuant to Ordering Paragraph No. ("OP") 2 of D.22-08-024, BVES submits this Tier 1 advice letter to "establish a memorandum account to track and record the incremental costs associated with implementing the submetering protocol, to be reviewed for reasonableness and cost recovery in a future general rate case."<sup>1</sup>

### **BACKGROUND**

On December 19, 2018, the Commission issued an Order Instituting Rulemaking ("OIR") to "Continue the Development of Rates and Infrastructure for Vehicle Electrification" ("DRIVE").<sup>2</sup> One of the purposes of the DRIVE OIR was for Energy Division Staff to develop and establish a Transportation Electrification Framework ("TEF"), to help guide policies and programs supporting California's Zero Emission Vehicle ("ZEV") infrastructure. On February 3, 2020, a ruling requesting feedback on the draft TEF was issued. On July 20, 2022, BVES, along with two other members of the California Association of Small and Multi-Jurisdictional Utilities (CASMU) submitted joint comments on the June 30, 2022 Proposed Decision Adopting Plug-In Electric

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<sup>1</sup> D.22-08-024 at page 43.

<sup>2</sup> R.18-12-006.

Vehicle Submetering Protocol and Electric Vehicle Supply Equipment Communication Protocols.

D.22-08-024 considered comments filed in 2020 and 2021, resolving issues regarding EVSMP, EVSECP, and implementation and timeline. The authorization to open memorandum accounts for tracking specific costs related to the implementation of submetering requirements was proposed and discussed in comments and approved in D.22-08-024.

**PRELIMINARY STATEMENT**

D.22-08-024, Ordering Paragraph (“OP”) #2 states

*2. Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Service Inc., and PacifiCorp d/b/a Pacific Power may each file a Tier 1 advice letter within 30 days of the issuance of this decision to establish a memorandum account to track and record the incremental costs associated with implementing the submetering protocol, to be reviewed for reasonableness and cost recovery in a future general rate case.*

**COMPLIANCE**

This advice letter is in full compliance with OP 2 in D.22-08-024.

**TIER DESIGNATION**

This advice letter is submitted with a Tier 1 designation.

**EFFECTIVE DATE**

BVES respectfully requests this advice letter become effective on September 6, 2022.

**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 CPUC in acting on the request.

A protest must be mailed within 20 days of the date the CPUC accepts the advice letter for filing. The Calendar is available on the CPUC'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

ATTN: Tariff Unit

505 Van Ness Avenue

San Francisco, CA 94102

E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

Copies of any such protests should be sent to this utility at:

Bear Valley Electric Service, Inc.

ATTN: Nguyen Quan

630 East Foothill Blvd.

San Dimas, CA 91773

Fax: 909-394-7427

E-mail: [RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com)

If you have not received a reply to your protest within 10 business days, contact Nguyen Quan at (909) 394-3600 ext. 664.

**Correspondence:**

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

Nguyen Quan

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/Ronald Moore

Ronald Moore

Regulatory Affairs Department

Bear Valley Electric Service, Inc.

c: Laura Martin , Energy Division  
R. Mark Pocta, California Public Advocates Office  
BVES General Order 96-B Service List



**Cal P.U.C.  
Sheet No.**

**Title of Sheet**

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3224-E      PRELIMINARY STATEMENT

3225-E      Table of Contents  
Sheet 1

3223-E

PRELIMINARY STATEMENTS  
Submetering Protocol Implementation Memorandum Account (SPIMA)

**ZZ. Submetering Protocol Implementation Memorandum Account (SPIMA)**

(N)

Pursuant to Commission Decision 22-08-024, dated August 4, 2022, in Order Instituting Rulemaking 18-12-006, the Submetering Protocol Implementation Memorandum Account ("SPIMA") will record costs incurred for implementing the plug-in electric vehicle submetering and electric vehicle supply equipment communication protocols and requirements not otherwise included in Bear Valley Electric Service, Inc.'s (BVES) revenue requirement.

Costs recorded in the SPIMA shall include, but are not limited to, submeter installation, maintenance, certifications, field testing and calibration.

1. PURPOSE

The purpose of the SPIMA is to track incremental costs and carrying costs for capital investments incurred for planning and implementation activities associated with the Plug-in Electric Vehicle Submetering Protocol ("EVSM") and the Electric Vehicle Supply Equipment Communication Protocols ("EVSECP"), not otherwise covered in BVES's revenue requirement.

2. APPLICABILITY

The SPIMA applies to all residential and non-residential customer classes and rate schedules. Applicable customers are defined as customers that can access utility service under any of the residential or non-residential utility tariffs except for those specifically excluded by the Commission. Net Energy Metering customers are excluded from participating at this time.

3. ACCOUNTING PROCEDURES

BVES shall maintain the SPIMA by making entries at the end of each month as follows:

- a. A debit entry shall be made to the SPIMA at the end of each month to record the incremental costs associated with the planning and implementation activities associated with the EVSM and EVSECP.
- b. Interest shall accrue to the SPIMA on a monthly basis by applying a rate equal to one-twelfth of the three-month Commercial Paper Rate, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of-month and the end-of-month balances.

4. EFFECTIVE DATE

Pursuant to D.22-08-024, the SPIMA shall be effective on September 6, 2022.

5. DISPOSITION

Disposition of amounts recorded in the SPIMA shall be determined in a subsequent rate-setting filing authorized by the Commission.

(N)

(Continued)

Advice Letter No. 451-E  
Decision No. 22-08-024

*Issued By*  
**Paul Marconi**  
*President*

Date Filed September 6, 2022  
Effective September 6, 2022  
Resolution No. \_\_\_\_\_

Table of Contents

The following tariff sheets contain all effective rates and rules affecting rates and service of the utility, together with information relating thereto:

<u>Subject Matter of Sheet</u>	<u>Sheet No.</u>
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No. A-2 General Service	3193-E, 1838-E
No. A-3 General Service	3194-E, 1840-E
No. A-4 General Service- TOU	3195-E, 1842-E, 1843-E
No. A-5 TOU Primary	3196-E, 1845-E, 1846-E
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No. D Domestic Service - Single-family Accommodation	3211-E, 1851-E, 1852-E
No. DE Domestic Service to Company Employees	3212-E, 1854-E
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No. UF-E Surcharge to Fund PUC Utilities Reimbursement Account Fee	2861-E
No. TOU-EV-1 General Service Time of Use Electric Vehicle Charging	2605-E, 2606-E
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No. 12 - Rates and Optional Rates	612-E, 613-E
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(Continued)

Advice Letter No. 451-E  
 Decision No. 22-08-024

*Issued By*  
**Paul Marconi**  
*President*

Date Filed September 6, 2022  
 Effective September 6, 2022  
 Resolution No. \_\_\_\_\_

**GOLDEN STATE WATER COMPANY**

**G.O. 96-B DISTRIBUTION LIST**

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