

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**ENERGY DIVISION**

**RESOLUTION E-5395**

**September 18, 2025**

**RESOLUTION**

Resolution E-5395. Implementation of Bear Valley Electric Service, Inc.'s ("BVES") (U 913 E) Income-Graduated Fixed Charges Pursuant to Ordering Paragraph 10(b) of Decision 24-05-028

**PROPOSED OUTCOME:**

- Approves with modifications BVES's request to implement the Base Services Charge (BSC) pursuant to Decision (D.) 24-05-028.
- Orders BVES to file a Tier 2 Advice Letter at least 90 days before the implementation of the BSC with updated total rates, tariff sheets, applicability, and bill analysis information.
- Affirms a draft marketing plan which informs customers that they must take action to become eligible for the lowest Base Services Charge.

**SAFETY CONSIDERATIONS:**

- There are no safety considerations associated with this Resolution.

**ESTIMATED COST:**

- Authorizes up to \$109,527 of actual incremental implementation costs to be recorded in the Income Graduated Fixed Charge Memorandum Account.

By Advice Letter 495-E, submitted September 12, 2024 to service list (R.22-07-005), and Advice Letter 495-E-A, submitted October 1, 2024.

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**SUMMARY**

This Resolution approves with modifications Bear Valley Electric Service, Inc.'s ("BVES") (U 913 E) Advice Letter (AL) 495-E and AL 495-EA to implement an

income-graduated fixed charge (IGFC, fixed charge, Base Services Charge, or BSC) for residential customers pursuant to Decision (D.) 24-05-028 (Decision) to accelerate the state's clean energy transition. That Decision changes how investor-owned utilities (IOUs) bill residential customers for infrastructure-related costs. We anticipate the fixed charge not only lower the price for a unit of electricity for all customers but also makes it more affordable to electrify homes and vehicles, regardless of income or where someone lives.

The BSC will be applied based on income tiers, with lower-income customers paying a lower charge and higher-income customers paying a higher charge. This approach ensures that the burden of the fixed charge is distributed fairly and does not disproportionately affect lower-income households, including customers participating in the California Alternate Rates for Energy (CARE) program.<sup>1</sup> CARE customers who earn 100% of federal poverty guidelines or less are now eligible for additional savings through the new CARE Plus program, which offers the lowest fixed charge level. BVES' Advice Letter, supplemented with follow-up data request responses, have demonstrated sufficient detail and are approved with modifications.

## **BACKGROUND**

On June 30, 2022, California Assembly Bill (AB) 205 (Stats. 2022, ch. 61) became law, paving the way for the Commission to adopt a more equitable rate structure for residential customers and to direct the electric IOUs to collect a reasonable portion of the fixed costs of providing electric service for residential customers. AB 205 required that a fixed charge be established on an income-graduated basis, with no fewer than three income thresholds.

On July 14, 2022, the Commission initiated Rulemaking (R.) 22-07-005 to establish demand flexibility policies and modify electric rates 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. Phase 1 of R.22-07-005 is organized into two concurrent tracks, and Track A established the fixed charge for residential rates for all electric IOUs in accordance with AB 205, including small and multi-jurisdictional electric utilities.

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<sup>1</sup> Qualifying low-income households receive up to a 35% discount on electric bills from CARE.

On January 16, 2024, Bear Valley Electric Service, Inc., Liberty Utilities, and PacifiCorp d/b/a Pacific Power (collectively, Small Utilities or SMJUs) and the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) filed a joint motion (Settlement Motion) for adoption of a Track A settlement agreement (Settlement Agreement). On February 14, 2024, CforAT, the Large Utilities, Sierra Club/California Environmental Justice Alliance (CEJA), the Solar Energy Industries Association (SEIA), and The Utility Reform Network (TURN), and the Natural Resources Defense Council (NRDC) (Collectively TURN/NRDC) filed comments on the Settlement Motion. On March 1, 2024, the Small Utilities, CEJA, and the Large Utilities filed replies to comments on the Settlement Motion.

On May 15, 2024, the Commission adopted the Decision authorizing all electric IOUs—Pacific Gas and Electric (PG&E), Southern California Edison (SCE), San Diego Gas & Electric (SDG&E) (collectively, Large Utilities), and the Small Utilities—to change the structure of residential customer bills in accordance with AB 205. The Decision generally requires the 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.

The Decision adopted a gradual, incremental approach to implementing AB 205 requirements, including the requirement that the fixed charge be “established on an income-graduated basis with no fewer than three income thresholds.”<sup>2</sup> For the Large Utilities, the adopted billing structure was aligned with income-graduated fixed charges, built upon the existing income-verification processes of the utilities’ existing income-qualified programs, which are already divided into three groups:

- 1) CARE for customers whose household income falls below 200% of the Federal Poverty Level (FPL),<sup>3</sup>
- 2) FERA (Family Electric Rate Assistance), which offers an 18% discount on customer electricity bills for households with incomes between 200% and 250% of FPL, and
- 3) all other customers, who pay the default electric rate.

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<sup>2</sup> AB-205 Energy (2021-2022).

<sup>3</sup> The Federal Poverty Level or Federal Poverty Guideline Level (FPGL) is determined by the Department of Health and Human Services. Required by Section 673(2) of the Omnibus Budget Reconciliation Act (OBRA) of 1981 ([42 U.S.C. 9902\(2\)](#)) to be adjusted on at least an annual basis, based on the Consumer Price Index for All Urban Consumers, The poverty guidelines are used as an eligibility criterion for a number of need-based federal, state, and local programs.

Because Small Utilities do not operate a FERA program, CARE is currently the only income-qualified rate discount available to customers served by the Small Utilities. Therefore, a different data collection and tier assignment process needed to be designed, developed, communicated, and implemented to comply with the three-income threshold requirement.

The Decision also approved the Settlement Agreement<sup>4</sup> filed by the Small Utilities and Cal Advocates on January 16, 2024. This Settlement Agreement approved the adopted BVES-specific income-graduated fixed charges<sup>5</sup> to residential customer bills during the first quarter of 2026 (between January 1, 2026, and March 31, 2026), implementing the adopted base billing structure below:<sup>6</sup>

- a. **Tier 1** will be assigned to CARE customers with incomes of 0 to 100 percent of the Federal Poverty Guideline levels. Customers will need to attest to having eligible incomes; the initial base fixed charge would be no more than \$5.00/month.
- b. **Tier 2** will be assigned to CARE customers with incomes above 100 percent and at or below 200 percent of the Federal Poverty Guideline levels; the initial base fixed charge would be no more than \$10.06/month.
- c. **Tier 3** will be assigned to customers who do not qualify for the first or second tiers. The initial base fixed charge would be no more than \$23.22/month.<sup>7</sup>

The new billing structure will apply to all residential rates of the electric IOUs, except for master-metered rates that are not sub-metered, separately metered electric vehicle rates for customers whose primary meter has a fixed charge, or rate schedules that are scheduled to be eliminated by the second quarter of 2026. The revenues from fixed charges will be applied to reduce volumetric rates equally across all time-of-use (TOU) periods.

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<sup>4</sup> With the exception of the proposal to recover each of the Small Utilities' base revenues (and Bear Valley's General Rate Case Revenue Requirement Memorandum Account) and the associated fixed charge levels. (D.24-05-028. Conclusion of Law 46 at page 156).

<sup>5</sup> Joint Motion for Adoption of the Track A Settlement Agreement Regarding First Version Income-Graduated Fixed Charges For Bear Valley Electric Service, Inc. (U 913 E), Liberty Utilities (Calpeco Electric) Llc (U 933 E), and Pacificorp (U 901 E) at page 9.

<sup>6</sup> The settlement at page 9 included "Total Adjustment Rates Converted to a Fixed Charge" of \$0.77 for Tiers 1-2, and \$2.02 for Tier 3. This Advice letter only approves the base fixed charge, and not the "Total IGFC" which includes the adjustment component based on the recovery of specific revenue requirements.

<sup>7</sup> Settlement Agreement at Attachment 1, D.24-05-028 at 120.

The Decision established an Implementation Working Group (IWG) that will be convened and facilitated by the Commission's staff to assess and evaluate fixed charges and (a) identify problems with implementation and ME&O efforts and suggest solutions at meetings, and (b) provide written recommendations to the Commission's staff about how lessons learned from the implementation of the fixed charge should influence the design of future fixed charges or alternative rate mechanisms.<sup>8</sup>

As directed in the Decision for implementation of the fixed charge, BVES (1) submitted a Tier 1 AL (AL 493-E) on June 14, 2024, to establish a new IGFC memorandum account (IGFCMA) and a new IGFC balancing account (IGFCBA);<sup>9</sup> (3) participated in the large utilities' marketing, education, and outreach workshop Fixed Charge ME&O Workshop on July 10, 2024,<sup>10</sup> and filed this timely Tier 3 advice letter.<sup>11</sup>

This advice letter must contain:

- (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;
- (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;

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<sup>8</sup> D.24-05-028 at 101.

<sup>9</sup> Ibid., OP 9. BVES submitted AL 493-E, and Energy Division approved the unprotested AL on July 23, 2024.

<sup>10</sup> Ibid., OP 10 (a). At this workshop, the Joint Utilities proposed an aligned terminology and messaging strategy which renamed the Income Graduated Fixed Charge (IGFC) to a Base Services Charge (BSC). This naming convention was adopted by the Commission through Resolutions SCE Res E-5356, SDG&E Res E-5355, PG&E Res E-5354. While Bear Valley's advice letter retains the IGFC acronym, in internal documents such as their internal budgets, the Commission refers to this same charge as the BSC throughout this document, unless it is a direct quote from the utility's supporting materials.

<sup>11</sup> Ibid., OP 10 (b).

- (vii) a proposed implementation and administrative costs budget, with a breakdown by line-item and a justification for each line-item;<sup>12</sup> and
- (viii) information about when and how customers will be informed about the opportunity to be placed in Tier 1 and how to reduce barriers to enrolling in Tier 1.<sup>13</sup>

On September 12, 2024, BVES filed AL 495-E, which was supplemented through AL 495-E-A on October 1, 2024, to provide additional detail regarding the anticipated costs associated with its ME&O plan. The entire filing was superseded with substitute sheets submitted on November 22, 2024 with a new version of AL 495-E-A, primarily to include page numbers, which had previously been missing. It should also be noted that bill impact studies presented in this advice letter are consistent with what BVES had filed in a General Rate Case (“GRC”) proceeding in Application (A.) 22-08-010 which was approved on January 22, 2025 through D.25-01-007. BVES states that it anticipates filing a subsequent Tier 2 Advice Letter in 2025 to update rates as part of the BSC implementation.<sup>14</sup>

In response to emails and data requests submitted by Energy Division, BVES provided additional implementation details and clarified its efforts to remove barriers to Tier 1 Enrollment.

## **NOTICE**

Notice of AL 495-E was made by publication in the Commission’s Daily Calendar. BVES states that a copy of the AL and its supplement and substitute sheets were mailed and distributed in accordance with Section 4 of General Order (GO) 96-B on the following dates:

Sept. 12, 2024	BVES 495-E Filed
Oct. 2, 2024	BVES 495-EA Filed (ME&O Details)
Nov. 24, 2024	Substitute Sheets to BVES 495-EA Filed

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<sup>12</sup> Ibid., Conclusion of Law 70.

<sup>13</sup> Ibid., Conclusion of Law 51.

<sup>14</sup> BVES AL 495-EA at page 34.



## **PROTESTS**

BVES's ALs 495-E and 495-EA were not protested.

## **DISCUSSION**

The Commission has reviewed the AL, protests, supplemental AL, substitute sheets, and BVES's responses to data requests submitted by Cal Advocates and Energy Division staff. We address issues raised in the following sections: (1) rate design, (2) tier assignments, (3) and ME&O plan.

### **1. Rate Design**

In the Decision at Ordering Paragraph 8, the Commission approved the majority of the Rulemaking (R.) 22-07-005 Settlement Agreement between the Small Utilities and the California Public Utilities Commission's Public Advocates Office (Cal Advocates) including the income-graduated fixed charge income tiers and rate design, income verification methodology, recovery of implementation and administration costs, and balancing of revenue methodology.

The Commission determined that in the Settlement, specific base fixed charge levels were established, but a specific methodology for determining which cost categories were included in those values was not defined. This prevented the Commission from confirming that the proposed fixed charges would recover appropriate fixed costs. The Decision did not approve the Settlement's proposal for each of the Small Utilities base revenues and proposed fixed charge levels. However, the Commission did grant an opportunity for the Small Utilities to justify the base revenue requirement levels and Ordering Paragraph 10 required each Small Utility to include the following information in a Tier 3 advice letter:

- a. 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;
- b. 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;
- c. the revenue requirement for each of the fixed cost categories approved in D.24-05-028, if applicable to the utility;
- d. 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;
- e. proposed fixed charge levels; and

- f. a bill impact analysis demonstrating that both Tier 1 and Tier 2 customers with average electricity usage in each baseline territory will realize bill savings compared to currently effective rates.

In AL 495-E BVES provided details on each of these elements, noting that final rates will be filed in 2025 as part of the Base Services Charge implementation.<sup>15</sup>

### **1.1. Base Revenue Cost Categories and Fixed Costs**

OP 10 of the Decision directed each of the SMJUs to provide a list of all base revenue cost categories to be recovered through their respective income-graduated fixed charges and an explanation of why each listed base revenue cost category is a fixed cost similar to a category approved for recovery through the Decision. COL 7 of the Decision also defined fixed costs as costs that do not directly vary based on the electricity usage of the customer from whom the revenue is being collected. The Decision identified fixed cost categories for the large IOUs as Marginal Customer Access Costs (MCACs), Public Purpose Program non-by passable charges, New System Generation charges, Local Generation charges, and Nuclear Decommissioning non-by passable charges. Finally, the Decision defined MCACs as marginal customer equipment costs consisting of final line transformer, service line drops and meter costs, and the ongoing customer service costs associated with keeping customers connected to the grid, as well as revenue cycle services such as billing and customer care.

In its Tier 3 AL, BVES defined the MCACs and other fixed cost base revenue categories that it proposed to recover through the fixed charge. It primarily focused on MCACs and noted that these costs represent \$44.70 per customer per month across permanent and non-permanent residential customers. This was 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.

In its advice letter, BVES also included Attachments explaining which base rate cost categories it classified as customer-related. Through analyzing financial data, BVES was able to classify plant investments as fixed costs such as meters, basic customer services, as well as a portion of distribution plant related to providing customers access to the electric grid, such as poles, overhead conductors, and underground conductors. These distribution-related marginal customer access costs were derived using statistical analysis that examined over a recent 10-year period the relationship between poles, overhead conductors, underground conduit, and underground conductors. The portion

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<sup>15</sup> BVES AL 495-EA at page 34.



of distribution plant that varies with the number of customers was classified as a customer cost.

In total, BVES classified \$16.3M (42.78%) of BVES's requested 2023 base revenue requirement of \$38M as customer costs. Of this, \$12.5M or 77% of this revenue requirement is allocated to the residential rate class based on the results of its marginal cost study from its ongoing GRC proceeding in A. 22-08-010. COL 56 of the Decision notes the following: "If the Commission determines in a resolution of the Tier 3 advice letter that the total revenue requirement for all of the Small Utilities' fixed cost categories is sufficient to support the fixed charge levels in the Settlement Agreement, then it would be reasonable for the resolution to approve the Settlement Agreement's fixed charge levels." Additionally, COL 57 of the Decision states: "If the Commission resolution determines that the total revenue requirement for all of the Small Utilities' fixed cost categories does not support the fixed charge levels in the Settlement Agreement, it would be reasonable for the Commission resolution to reduce the Small Utilities' fixed charge levels accordingly." As aforementioned, OP 10 of the Decision also ordered the Small Utilities to specify information and provide a justification for the proposed fixed charges from the Settlement Agreement in a subsequent Tier 3 Advice Letter. Reading the COLs and OP 10 together demonstrates intent by the Commission to either approve the Settlement Agreement's fixed charge levels if substantiated by information provided in the Tier 3 AL, or to reduce the proposed fixed charge to below the Settlement Agreement level. The Decision does not authorize Energy Division staff to approve a total fixed charge level for the Small Utilities higher than the Settlement Agreement amounts.

This resolution finds that the base revenue cost categories and the total revenue requirement provided in AL 495-E are sufficient to support the base fixed charge levels proposed in ALs 495-E and 495-EA. The Commission understands the aforementioned customer-driven costs such as poles, underground conduits, and distribution plant costs fall within COL 7's definition of fixed costs as those that do not directly vary based on the electricity usage of ratepayers. As a result, the Commission finds that BVES's proposed fixed cost categories support AL 495-E's base fixed charge levels to be appropriate and compliant with OP 10 of the Decision.

While BVES's proposal in AL 495-E complies with the requirements outlined in COL 56 of the Decision, this resolution does not approve BVES's methodology for determining which base revenue cost categories are eligible to be considered fixed costs, and it should not serve as a precedent for defining fixed cost categories in future ratemaking proceedings for either Large or Small Utilities.

## 1.2. Volumetric Rate Conversion to Customer Rate

In its Tier 3 AL, BVES includes a table (provided below) detailing plans to convert current volumetric adjustment rates to monthly tiered fixed charges. This “net fixed charge” (total fixed charge) includes “adjustment rates” or residential surcharges which will be converted from a volumetric rate to a fixed monthly charge. The total fixed charges are the sum of the base fixed charges and adjustment rates.

Specifically, BVES demonstrates that the Energy Savings Assistance (ESA), CARE, Public Purpose Program (PPP), and Catastrophic Event Memorandum Account (CEMA) will be converted to a monthly charge and added to the base monthly fixed charge to create a net fixed charge. BVES also noted that it anticipates filing a Tier 2 AL in 2025 to update the adjustment rates using the most current values.

The illustrative total fixed charges as noted in AL 495-EA are \$25.85 for Tier 3 non-CARE customers, \$11.06 for Tier 2 CARE customers, and \$6.00 for Tier 1 CARE Plus customers. See Figure 1 listed below for BVES’s proposed base revenue fixed charges and illustrative net (or total) fixed charge (including adjustment rates).<sup>16</sup> The Commission directs BVES to file a Tier 2 AL at least 90 days prior to the implementation of the BSC to finalize its adjustment schedule conversion and net fixed charge. BVES proposes to maintain revenue neutrality by increasing its fixed charge revenues for the residential permanent rate class by \$1.1 million and the non-permanent rate class by \$1.8 million, while reducing usage charge revenues by the same amounts.

Figure 1: BVES Proposed Conversion of Adjustment Rates to Monthly Fixed Charges

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

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

<sup>16</sup> Settlement Agreement of the “Joint Motion For Adoption of the Track A Settlement Agreement Regarding First Version Income-Graduated Fixed Charges For Bear Valley Electric Service, Inc. (U 913 E), Liberty Utilities (Calpeco Electric) Llc (U 933 E), and Pacificorp (U 901 E), at 9.

### 1.3. Proposed Base Fixed Charge Levels

In its Tier 3 AL 495-EA, BVES proposes again its Settlement Agreement base revenue residential fixed charges of \$23.22 per month for Tier 3 non-CARE customers, \$10.06 per month for Tier 2 CARE customers, and \$5.00 per month for Tier 1 CARE Plus customers. The CARE Plus fixed charge is available to qualifying customers with incomes up to 100% of the Federal Poverty Guideline level ("FPG" or "FPL"), while the Tier 2 CARE fixed charge is available to qualifying customers with incomes between 100% and 200% of the FPL. The proposal was uncontested, and the Commission finds BVES's proposed base monthly fixed charges reasonable and compliant with OP 10 of the Decision.

### 1.4. Bill Impact Analysis

BVES also included analysis of present rates and proposed base fixed charges for residential customers and the subsequent bill impacts. It included three Tables (provided below) that summarized the rates for an average residential customer using 850 kWh/month, showing the percentage change in the average customer's monthly bill. BVES showed that both CARE and CARE Plus customers will receive a monthly bill decrease under the proposed BSC rate design compared to rates approved in BVES' latest GRC application (A.22-08-010) through D. 25-01-007.

Figure 2: Customer Bill Impacts (non-CARE customers)

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

This Table from AL 495-EA shows bill increases under the BSC base rate design as compared to the proposed rate design in its recent GRC proceeding (A.22-08-010) for non-CARE customers who use on average 447 kWh during the winter months and 354 kWh during the summer months.

Figure 3: Customer Bill Impact (Tier 2 CARE)

CARE Rate - Tier 2								
Bill Impact Analysis	Monthly			Proposed				
Total Rates	Usage (kWh)	IGFC		TY2023 GRC	Bill Increase /	Bill Increase /		
		Bill \$		Bill \$	(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	176.9	\$	44.33	\$	45.89	\$	(1.56)	-3.40%
25% Below Avg. Usage	265.3		61.46		64.79		(3.32)	-5.13%
Average Usage	353.7		80.13		85.34		(5.21)	-6.11%
25% Above Avg. Usage	442.1		103.98		111.35		(7.37)	-6.62%
50% Above Avg. Usage	530.6		134.29		144.01		(9.72)	-6.75%
Monthly Average Usage	400.4	\$	92.89	\$	99.25	\$	(6.36)	-6.40%

This Table from AL 495-EA shows bill decreases under the BSC base rate design as compared to the proposed rate design in its recent GRC proceeding (A.22-08-010) for Tier 2 CARE customers who use on average 447 kWh during the winter months and 354 kWh during the summer months.

Figure 4: Customer Bill Impacts (Tier 1 CARE Plus)

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

This Table from AL 495-EA shows bill decreases under the BSC base rate design as compared to the proposed rate design in its recent GRC proceeding (A.22-08-010) for Tier 1 CARE Plus customers who use on average 447 kWh during the winter months and 354 kWh during the summer months.

This proposal was uncontested, and the Commission finds BVES's approach reasonable. Since ALs 495-E and 495-EA only provided bill impact analysis using the BSC base fixed charge, the Commission directs BVES to file an additional bill analysis in the previously mentioned Tier 2 AL which will be filed at least 90 days prior to the implementation of the BSC. This Tier 2 AL will use the BSC net fixed charge, which is comprised of the base fixed charge and most current adjustment schedule rates converted to a monthly charge.

### 1.5. Applicability to Optional Rates and Master-Metered Rates

BVES contends that applying the same fixed charges to all residential rates would prevent rate shopping and will allow for a more equitable allocation of costs to customers. The Decision, however, noted that an exception should be made to "master-metered rates that are not sub-metered, separately-metered electric vehicle rates for customers whose primary meter has an income-graduated fixed charge, and rate schedules that are scheduled to be eliminated by the second quarter of 2026."<sup>17</sup>

<sup>17</sup> Decision at 133.

BVES' approaches for Master-Metered and Electric Vehicle (EV) customers do not appear to follow this guidance, and the Commission directs BVES to include details on which rates will include the BSC in the previously mentioned Tier 2 Advice Letter accordingly as described in section 1.5.3: "Clarifying Exemptions from Fixed Charges" for the reasons described below.

### **1.5.1. Master-Metered Customers**

The Small Utilities argued that applying the same fixed charges to all residential rates would prevent rate shopping and will allow for a more equitable allocation of costs to customers.<sup>18</sup> They highlighted that the unique characteristics of the SMJUs, namely the high percentages of seasonal vacation home customers who are not full-time residents, and their intended desire to "avoid a piecemeal approach to rate reform and unintended rate shopping".<sup>19</sup>

In balancing administrative efficiency while minimizing rate shopping and equity and consistent with the Decision, the Commission continues to find it reasonable to authorize income-graduated fixed charges for all of the Small Utilities' default and optional residential rate schedules, with the following exceptions: master-metered rates that are not sub-metered, separately-metered electric vehicle rates for customers whose primary meter has an income- graduated fixed charge, and rate schedules that are scheduled to be eliminated by the second quarter of 2026.<sup>20</sup>

BVES appears to propose the opposite, and notes that "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."<sup>21</sup> The Commission rejects this proposal to charge the highest—or any—Base Services Charge to its master-metered customers.

The Bear Valley Multi-Family rate is to be "Applicable only to permanent residents of Bear Valley for separately metered single-phase service to a multi-family

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<sup>18</sup> Joint Opening Brief of Bear Valley Electric Service, Inc. (U 913 E), Liberty Utilities (Calpeco Electric) Llc (U 933 E), and PacifiCorp (U 901 E) in Rulemaking 22-07-005 filed October 6, 2023 at 7.

<sup>19</sup> Joint Opening Brief of Bear Valley Electric Service, Inc. (U 913 E), Liberty Utilities (Calpeco Electric) Llc (U 933 E), and PacifiCorp (U 901 E) in Rulemaking 22-07-005 filed October 6, 2023 at 7-8.

<sup>20</sup> D.24-05-028 at 133.

<sup>21</sup> BVES AL 495-EA at 23.



accommodation on a single premise where all single-family accommodations are not separately metered. This schedule is closed to new installations.”<sup>22</sup>

BVES’ apparent proposal to add a Base Services Charge to these customers’ rates contradicts the Commission Decision. This proposal, if made, is thus rejected. Per the Decision, master-metered rates which are not submetered are exempt from the fixed charge. As noted in section 1.5.3: Clarifying Exemptions from Fixed Charges, BVES shall include with its Tier 2 Advice Letter which rates are subject to, or exempt from the Base Services Charge to ensure clarity..

### **1.5.2. EV Customers**

BVES proposes that “Customers taking service on schedule TOU-EV are currently exempt from the monthly Fixed Charge<sup>23</sup> without specifying which of their TOU-EV rates would apply, and why these rates would fall within the Commission’s exceptions.

BVES has three approved TOU-EV rates, TOU-EV-1, TOU-EV-2, and TOU-EV-3<sup>24</sup>. This exemption should only apply to TOU-EV-1 which is an adjunct rate applicable to customers on a premise concurrently served under a Domestic (D and DO) schedule.<sup>25</sup> This is aligned with the Commission policy determination, “that a residential customer should not be required to pay two fixed charges for a single residence.”<sup>26</sup>

### **1.5.3. Clarifying Exemptions from Fixed Charges**

In response to a Commission request, the Large Utilities each provided<sup>27</sup> a comprehensive list of their residential rates, whether each rate currently has a fixed charge, and whether it would include an income graduated fixed charge in the future: Although the Small Utilities were not required to supply similar information, we find that it would be useful ensure a common understanding. Accordingly BVES is ordered to provide information in its forthcoming Tier 2 Advice Letter as shown in the sample

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<sup>22</sup> Domestic Service - Multi Family DM - Domestic Service - Multi-Family Accommodation Tariff Sheet: [sch-dm.pdf](#)

<sup>23</sup> BVES AL 495-EA, at page 24.

<sup>24</sup> General Rate Schedules | Bear Valley Electric Service, Inc. <https://www.bvesinc.com/customer-service/rates-regulations/general-rate-schedules>

<sup>25</sup> Schedule No. TOU-EV-1 General Service Time-Of-Use Electric Vehicle Charging, Filed January 5, 2023, page 1, Applicability.

<sup>26</sup> D.24-05-028 at 87.

<sup>27</sup> Opening Comments in response to the Budget and Timing Ruling of Administrative Law Judge Wang in R.22-07-005, filed December 18, 2023.

table below, including a column specifying the common name of the rate, as featured on its website and approved Tariff Sheets.<sup>28</sup>

Schedule Abbreviation	Common Rate Name	Current Fixed Charge	Exemption from Income-Graduated Fixed Charges
Sch_D.pdf	Domestic Service - Single Family	No	None
Sch_DE.pdf	Domestic Service – Employee	No	None
Etc.			

## 2. Tier Assignments

AB 205 required that the “fixed charge shall be established on an income-graduated basis with no fewer than three income thresholds.”<sup>29</sup> The Decision thus required each utility to design its income-graduated fixed charges accordingly. The large IOUs assigned their customers to three tiers based on their two existing income-qualified programs, CARE and the Family Electric Rate Assistance Program (FERA).

It would not be possible to apply the same criteria to BVES, because the small utilities do not administer a FERA program.<sup>30</sup> Therefore, a different rate structure was adopted, as proposed by the Settlement Agreement:

- a. **Tier 1**, marketed as “CARE Plus” by BVES in their advice letter, will be assigned to CARE customers with incomes of 0 to 100 percent of the Federal Poverty Guideline levels. Current customers on CARE who qualify for the Tier 1 CARE Plus rate, must take additional action to be assigned to the Lowest Base Services Charge.
- b. **Tier 2**, marketed as CARE, will be assigned to CARE customers with incomes above 100 percent or below 200 percent of Federal Poverty Guideline levels. Like CARE customers served by the Large Utilities, these customers will not need to take action to be remain on the CARE rate and qualify for the middle tier Base Services Charge.

<sup>28</sup> General Rate Schedules | Bear Valley Electric Service, Inc.. <https://www.bvesinc.com/customer-service/rates-regulations/general-rate-schedules>

<sup>29</sup> AB 205 amending Section 739.9 of the Public Utilities Code 739.9. (e)(1)

<sup>30</sup> D.24-05-028 FOF 23.

- c. **Tier 3** will be assigned to non-CARE customers who do not qualify for the first or second tiers.<sup>31</sup>

While TURN/NRDC did not oppose the Settlement Agreement, they did express concerns about the method of assigning customers between the two low-income tiers. Specifically, they noted that the Settlement Agreement did not provide clear guidance on how CARE customers would be assigned to one of the two low-income tiers. According to the Joint Motion, “SMJUs will verify income using the existing California Alternative Rates for Energy (CARE) application process, as amended to obtain information for the additional 0-100% of FPL level.” Until the CARE application process is amended, it does not appear that the SMJUs will have adequate income data to reasonably determine to which low-income tier CARE customers should be assigned.”<sup>32</sup> The Commission echoed this concern, and in response, required each Small Utility to provide information in their Tier 3 implementation advice letter about when and how customers will be informed about the opportunity to be placed in Tier 1 and how to reduce barriers to enrolling in Tier 1.<sup>33</sup>

BVES’ advice letters did not provide this information, but BVES did subsequently provide a Draft CARE application labeled as Appendix A in this document, which supplies the requested information. The Commission has reviewed this information, and finds it consistent with the Decision, as detailed below.

## **2.1. Tier Assignment by Income**

As noted in the Settlement Agreement, BVES proposes to assign customers to their appropriate tiers through a self-attestation process, similar to the current CARE application process which allows customers to determine CARE eligibility based on full-time residency and enrollment in other income-qualified programs or household income.<sup>34</sup>

Accordingly, BVES proposes the following tier assignment processes:

- **CARE Plus:** (Tier 1) BVES will assign customers who attest to having eligible incomes through the revised CARE application process.

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<sup>31</sup> D.24-05-028 at 120.

<sup>32</sup> Response of NRDC and TURN to the Joint Motion for Adoption of the Track A Settlement Regarding First Version Income-Graduated Fixed Charges for the Small IOUs. February 14, 2024 at page 2.

<sup>33</sup> D.24-05-028 Ordering Paragraph 51 at page 157.

<sup>34</sup> BVES AL 495-EA at 23.

- CARE: (Tier 2) BVES will assign all customers currently enrolled in CARE to Tier 2 without the need for the customer to take any action. Going forward, customers who enroll in CARE and do not attest to earning a household income level that would qualify them for CARE Plus will automatically be enrolled in this tier.
- Non-CARE: (Tier 3) all other customers are defaulted to this rate.

### **2.1.1. Tier 1 – CARE Plus Tier Assignment**

The Commission had already found it “reasonable for the Small Utilities’ income-graduated fixed charges to rely on their **existing** CARE income verification processes as amended to obtain income information from customers with incomes between 0 to 100 percent of Federal Poverty Guideline levels.”<sup>35</sup>

While not protested, BVES’s Advice Letter did not provide sufficient detail as to how the existing CARE income verification process would be amended to allow customers to self-attest that their incomes fall between 0 percent to 100 percent of Federal Poverty Guideline levels, or whether customers would qualify through a separate process.<sup>36</sup>

A follow-up data request response ultimately clarified that “BVES will utilize a single CARE Application that differentiates between the two programs,”<sup>37</sup> and provided a draft revised CARE Application.<sup>38</sup> This draft CARE application does not require household income from all applicants, but targets customers who believe they fall below 100% of Federal Poverty Guidelines as required for the lowest monthly Base Services Charge under CARE Plus.

The revised CARE Application provides information about why income data is being collected, but does not obligate standard CARE customers to provide income information if they qualify through categorical eligibility.

The Decision also ordered each of the Small Utilities to provide information in this implementation advice letter about when and how customers will be informed

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<sup>35</sup> D.24-05-028, Conclusion of Law 48 at page 157.

<sup>36</sup> BVES AL 495-EA at page 23.

<sup>37</sup> Email Response of Sean Matlock, Energy Resource Manager and Assistant Corporate Secretary, Bear Valley Electric Service, Inc. April 4, 2025 9:48:29 AM.

<sup>38</sup> Per email sent by Energy Resource Manager and Assistant Corporate Secretary Sean Matlock on April 11, 2025. Attached as Appendix A of this Resolution.

about the opportunity to be placed in Tier 1 and how the Small Utilities will reduce barriers to enrolling in Tier 1.<sup>39</sup>

BVES specifies in its detailed ME&O plan that it will provide enhanced outreach to CARE customers which includes additional information to inform them of the CARE Plus program. BVES proposes to highlight that CARE customers who earn 100% of FPL or less are eligible for extra savings through a discounted fixed charge. The Commission notes, however, that the plan in the Advice letter did not specify how BVES will **reduce** barriers to enrolling in Tier 1.

In follow-up emails and data requests, BVES clarified that it will reduce barriers to Tier 1 eligibility by providing current CARE customers with additional information including:

- The benefits of Tier 1, including potential cost savings.
- Eligibility criteria and how it differs from standard CARE enrollment.
- The enrollment process and timeline.
- How to self-certify and apply online.

This information will be included in billing inserts, BVES website, Facebook, and direct mail campaigns.<sup>40</sup> At Energy Division's further request, BVES provided additional draft marketing materials to confirm that customers will be able to enroll in CARE Plus when they become aware of BSC, even before the Q1 2026 rollout. BVES also included draft marketing collateral which clarifies that additional action *is* required in order to enroll in CARE Plus.<sup>41</sup> BVES' workpapers assume that, initially, 10% of customers will be assigned to CARE Plus.<sup>42</sup> Energy Division has reviewed the proposed marketing materials, labeled as Appendix B: Proposed Base Services Charge Flyer and Appendix C: Base Services Charge Landing Page Draft, and finds that they sufficiently fulfill the requirements of the Decision.

### 2.1.2. Tier 2 – CARE Tier Assignment

CARE customers are automatically defaulted to the Tier 2 CARE Base Services Charge unless they qualify for Tier 1 by providing specific income information through the revised CARE/CARE Plus application as described in the prior section. This statement

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<sup>39</sup> D.24-05-028. Conclusion of Law 51 at page 157.

<sup>40</sup> Data Request Response of Sean Matlock, Energy Resource Manager, Bear Valley Electric Service, Inc. March 4, 2025.

<sup>41</sup> Email Response of Sean Matlock, dated May 30, 2025.

<sup>42</sup> Workpaper "IGFC Residential Rate Design" tab Res\_Perm cell L4.

clarifies that “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.”<sup>43</sup> As noted earlier in this proceeding, BVES currently does not store specific income details, just CARE eligibility information.<sup>44</sup> Therefore, BVES does not currently have any income information to determine whether any CARE customers are living at the 100% or less of FPL threshold for Tier 1. Rather, BVES currently only requires self-attestation that these customers earn less than 200% of FPL, or self-attestation that they qualify for CARE through categorical eligibility.

In response to email requests, BVES clarified that its revised CARE application will include options for applying to CARE and CARE Plus, and that CARE Plus will specifically require self-attested income information.

In section three of this resolution describing the ME&O plan, we note that BVES will provide direct mail targeting all CARE and Medical Baseline customers with additional information introducing the CARE Plus program, and that it assures current CARE customers that no additional action will be required to remain in CARE, but additional action is required to enroll in CARE Plus.

### **2.1.3. Tier 3 Placement**

BVES notes that all other residential customers not assigned to Tier 1 or Tier 2 as described above will be assigned to Tier 3 and will be assessed the default monthly Tier 3 Fixed Charge.

## **3. Proposed ME&O Plan**

The Decision required that each Small Utility participate in the Large Utilities’ joint ME&O workshop to discuss the Large Utilities’ ME&O plans, research findings, and messaging, and include in its Tier 3 advice letter for implementing income-graduated fixed charges a utility-specific ME&O plan, a line-item budget for ME&O activity costs, and a justification for each proposed line-item cost.<sup>45</sup> This workshop was held on July 7, 2024.

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<sup>43</sup> BVES AL 495-EA at page 23.

<sup>44</sup> Joint Motion for Adoption of The Track A Settlement Agreement Regarding First Version Income-Graduated Fixed Charges for Bear Valley Electric Service, Inc. (U 913 E), Liberty Utilities (Calpeco Electric) Llc (U 933 E), and Pacificorp (U 901 E) at page 9.

<sup>45</sup> At page 134 and Conclusion of Law 67 at page 160.



At the workshop, the Large Utilities outlined a phased ME&O approach to 1) build awareness, 2) inform customers prior to implementation, and 3) engage customers post-implementation. The Large Utilities also conducted and shared research on proposed Fixed Charge Terminology and Messaging such as preference for the term “Base Services Charge” rather than “fixed charge” and that customers were not clear that the introduction of a Fixed Charge would result in lower volumetric rates.

The Large IOUs proposed aligned Terminology and Messaging consistent with the above findings in their BSC Implementation Advice Letters, which were approved by the Commission. The BVES Advice Letter closely follows this aligned messaging. Key amongst this message was “no action was needed on [the customers] part, as they will be automatically transferred to their new tariff.”<sup>46</sup> However, Energy Division notes one key difference: with the large Utilities, a key message from the workshop led by the Large Utilities was that “Utilities will assign all customers enrolled in CARE to Tier 1 without the need for the customer to take any action.” However, this message does not apply to CARE customers served by the Small Utilities: these customers must indeed take action to be assigned to the most discounted Base Services Charge tier. While not clear in the Advice Letter filings, eligible customers must act, by submitting self-attested household income which had not been requested before, in order to qualify for and be assigned to the most affordable Base Services Charge level. This was made clear through subsequent communications with BVES.

BVES’s ME&O plan is fundamental to raising awareness, promoting understanding, and encouraging acceptance of the fixed charge.<sup>47</sup> According to BVES, the approach of its ME&O plan is to educate residential customers about how the fixed charge will help address equity and affordability issues and set the stage for greater adoption of electrification in California by reducing volumetric rates for residential customers through effective communications before, during, and after implementation; which is critical to providing a positive customer experience regarding the change in how they will be billed for electricity.<sup>48</sup>

We find the BVES ME&O Plan, as clarified through data requests from Energy Division, and budget of \$109,527 to be reasonable and approved.

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<sup>46</sup> BVES AL 495-EA at 13 and 14.

<sup>47</sup> BVES AL 495-EA, Appendix A, at 11.

<sup>48</sup> *Id.*

### 3.1. ME&O Objectives and Strategies

The goals and objectives<sup>49</sup> of BVES' ME&O plan 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 they would see a reduction in monthly bills without changes to usage.
- To have an incremental approved budget to cover fixed charge ME&O expenses separate from existing programs, such as CARE.

BVES' ME&O strategies<sup>50</sup> 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.
- 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 (CBOs) to notify and educate hard-to-reach (HTR) customers.

BVES's Advice Letter does not explain how it will fulfill the requirements of Ordering Paragraph 5151 of the Decision that each SMJU provide information in their Tier 3 implementation advice letter detailing how and when customers will be informed about the opportunity to be placed on the CARE Plus Tier 1 Base Services Charge, and how to reduce barriers to enrolling in Tier 1. This requirement was included in the Decision

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<sup>49</sup> *Id.*

<sup>50</sup> *Id.*, at 11-12.

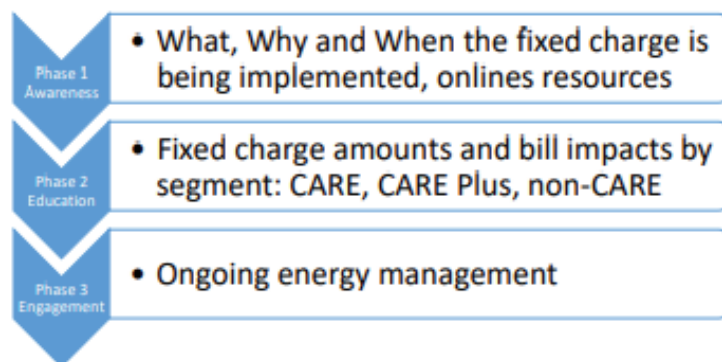
address concerns from The Utility Reform Network (TURN), and the Natural Resources Defense Council (NRDC), and the Commission that customers eligible for Tier 1 will not be aware of how or when to enroll in CARE Plus.

In response to follow-up Data Requests, BVES provided additional clarification and detail which satisfies the requirements, attached as Appendix B. These marketing materials and the revised CARE application clarify that additional action is required in order to qualify for the most discounted fixed charge. These draft marketing materials provide additional information about the CARE and CARE Plus program and their direct benefits to customers consistent with the Decision.

### 3.2. Overarching Phased Approach

BVES indicated that based on April 2024 research findings conducted by the Large IOUs, customers' preferences vary on when they would like to learn about the fixed charge.<sup>52</sup> BVES plans to implement its ME&O plan using a three-phased approach to achieve the outcomes of Awareness (Phase 1), Education (Phase 2), and Engagement (Phase 3).<sup>53</sup> According to BVES, this strategy will guide the timing of tactics and the progression of messaging through the various marketing and outreach channels as shown in **Figure 5** below.

**Figure 5 BVES Phased Approach<sup>54</sup>**



- **Phase 1—Awareness:** Up to nine months before implementation, the Awareness phase will set the context for the fixed charge, why it is being implemented, and when it will take effect. Awareness messaging will include basic education about

<sup>52</sup> BVES AL 495-EA, Attachment A, at 12.

<sup>53</sup> *Id.*

<sup>54</sup> *Id.*

what goes into electric bills, such as the difference between fixed, base, and supply charges. Tactics and messaging in this phase are broad, overarching, and conceptual.<sup>55</sup> This phase will also introduce the CARE Plus program through direct mail campaigns and two additional direct mail campaigns sending new CARE and CARE Plus forms to full-time residents and existing CARE, Medical Baseline, and Access and Functional Needs (AFN) customers.

- **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.<sup>56</sup>
- **Phase 3 – Engagement:** After implementation, the Engagement phase will focus on total bill and rate education.<sup>57</sup>

### 3.3. ME&O Messaging

BVES indicated Phase 1 (Awareness) of its ME&O plan will include:

1. Two direct mail campaigns targeting all customers, informing them about the fixed charge and reassuring them that no action is needed on their part, unless customers believe they qualify for the new CARE Plus rate eligible to customers with household income at or below 100% of FPL, as BVES will automatically transfer customers to the new tariff. The campaign will also explain the fixed charge and why BVES is taking this action mandated by the Commission.
2. Two direct mail campaigns targeting all CARE, Medical Baseline, and Access and Functional Needs customers, informing them about the fixed charge and that no action is needed on their part, as BVES will automatically transfer them to their new tariff, unless customers believe they are eligible for the new CARE Plus rate available to customers with household income at or below 100% of FPL. Additional information will introduce the CARE Plus program, highlighting that CARE customers who meet 100% of federal poverty levels are eligible for extra savings.
3. Two bill inserts targeting all customers with similar information, as noted above in Item 1.

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<sup>55</sup> BVES AL 495-EA, Attachment A, at 12.

<sup>56</sup> Id.

<sup>57</sup> Id, at 12-13.

4. Two bill inserts targeting all CARE, Medical Baseline, and Access and Functional Needs customers with similar information stated in Item 1 above.
5. Two direct mail campaigns will include the new CARE and CARE Plus forms for all full-time residents.
6. Boosted paid Facebook ads specific to the BVES service territory with fixed charge information noted in Items 1 and 2 above, including ten ads spread throughout all phases.
7. BVES website conveying fixed charge information as noted in Items 1 and 2 above.<sup>58</sup>

BVES indicated Phase 2 (Education) of its ME&O plan will run for three months, and includes:

1. One direct mail campaign to all customers, informing them about BSC and that no action is required on their part, unless customers believe they are eligible for the new CARE Plus rate available to customers with household income at or below 100% of FPL as they will be automatically transferred to their new tariff. The campaign will also explain what BSC 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 BSC and that no action is required on their part, unless customers believe they are eligible for the new CARE Plus rate available to customers with household income at or below 100% of FPL 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 noted in Item 1.
4. One bill insert to all CARE, Medical Baseline, and AFN customers with similar information as noted in Item 2.
5. Two direct mail campaigns sending new CARE and CARE Plus forms to all full-time residents.<sup>59</sup>

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<sup>58</sup> BVES AL 495-EA, Attachment A, at 13.

<sup>59</sup> BVES AL 495-EA, Attachment A, at 13-14.

BVES indicated Phase 3 (Engagement) of its ME&O plan will start no later than April 1, 2026, and end September 30, 2026, for a period of six months, and includes:

1. One bill insert to all customers, informing them about BSC and that no action is required on their part, [unless customers believe they are eligible for the new CARE Plus rate available to customers with household income at or below 100% of FPL as they will be automatically transferred to their new tariff. The campaign will also explain what BSC is and why BVES is taking this CPUC-mandated action.
2. One bill insert to all CARE, Medical Baseline, and Access and Functional Needs customers, informing them about BSC and that no action is required on their part [unless customers believe they are eligible for the new CARE Plus rate available to customers with household income at or below 100% of FPL 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 direct mail campaign sending new CARE and CARE Plus forms to all full-time residents.<sup>60</sup>

### 3.4. ME&O Timeline

Table 1: ME&O Timeline below provides an illustrative timeline of BVES' proposed outreach activities. According to BVES, the timeline may shift based on the issuance of the Resolution and BVES' go-live timeline. Energy Division staff acknowledges that the timeline has shifted as it worked with BVES to clarify its ME&O messaging.

**Table 1: ME&O Timeline<sup>61</sup>**

											Go-Live*				
	03/01/25	04/01/25	05/01/25	06/01/25	07/01/25	08/01/25	09/01/25	10/01/25	11/01/25	12/01/25	01/01/26	02/01/26	03/01/26	04/01/26	05/01/26
Website Development, new landing page and IGFC details	X	X	X	X											
Collateral, printed flyers, etc.	X	X	X	X											

<sup>60</sup> Id., at 14.

<sup>61</sup> Response to Energy Division's data request, Question 2b, December 30, 2024.



Boosted paid digital media ads, Meta	X	X	X	X	X	X	X	X	X	X					
(4) Bill Insert: General information, all customers					X	X			X					X	
(4) Bill Insert: CARE/MBL/AFN					X	X			X					X	
(3) Direct Mail: General Information and specific details for all rate classes (Q&A/FAQ style) front and back, single-sheet, non-glossy, all customers				X				X		X					
(3) Direct Mail: CARE/MBL/AFN Customers, front side only, single sheet, non-glossy				X			X			X					
(6) Direct mail new CARE and CARE Plus forms to all full-time residential customers							X	X	X	X				X	X
Public Relations contractor support	X	X	X	X											
IT and Rate Design Internal labor	X	X	X	X											

### 3.5. ME&O Budget

**Table 2: Proposed ME&O Budget<sup>62</sup>**

Category	2025	2026	Total
Website development, new landing page, and IGFC details	\$3,600		<b>\$3,600</b>
Collateral, printed flyers, etc.	\$750		<b>\$750</b>
Boosted paid digital media ads, Meta	\$5,000		<b>\$5,000</b>
(4) Bill insert: General information, all customers	\$5,922	\$1,974	<b>\$7,896</b>
(4) Bill insert: CARE/MBL/AFN	\$2,799	\$933	<b>\$3,732</b>

<sup>62</sup> Response to Energy Division's data request, Question 2c, December 31, 2024, and revised on January 8, 2025.

(3) Direct Mail: General information and specific details for all rate classes (Q&A/FAQ style) front and back, single-sheet, non-glossy, all customers	\$49,758		<b>\$49,758</b>
(3) Direct Mail: CARE/MBL/AFN customers, front side only, single sheet, non-glossy	\$11,389		<b>\$11,388</b>
(6) Direct mail new CARE and CARE Plus forms to all full-time residential customers	\$8,168	\$4,084	<b>\$12,252</b>
Public Relations contractor support	\$9,750		<b>\$9,750</b>
IT and Rate Design internal labor	\$5,400		<b>\$5,400</b>
<b>Total</b>	<b>\$102,536</b>	<b>\$6,991</b>	<b>\$109,527</b>

ED staff have also clarified with BVES that it does not expect to incur additional IT and Rate Design labor expenses with its proposed rate design beyond what is included above.

The Commission has reviewed BVES' proposed ME&O budget and finds it to be reasonable and consistent with the Decision.

### **COMMENTS**

"Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review. Any comments are due within 20 days of the date of its mailing and publication on the Commission's website and in accordance with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today. The draft Resolution was published for comment on August 15, 2025 and no comments were received.

## **FINDINGS AND CONCLUSIONS**

1. Assembly Bill (AB) 205 (Stats. 2022, ch. 61) authorized the California Public Utilities Commission (Commission) to adopt an equitable rate structure for residential customers and to direct the electric investor-owned utilities to collect a reasonable portion of the fixed costs of providing electric services for residential customers.
2. Decision (D.) 24-05-028 authorized all electric investor-owned utilities to change the structure of residential bills in accordance with AB 205.
3. D. 24-05-028 adopted a three-tier structure for the income-graduated fixed charge for each investor-owned utility to adopt and set specific rate design guidelines addressing which revenues may be collected through the fixed charge.
4. Implementing a three-tier rate structure for the income-graduated fixed charge requires an amendment to Bear Valley Electric Service's existing CARE application income verification process.
5. Bear Valley Electric Service anticipates filing a Tier 2 advice letter in 2025 to update rates as part of the Base Services Charge implementation.
6. Customers who are eligible for the Tier 1 CARE Plus rate must take additional action to be assigned to this lowest Base Services Charge.
7. Customers who qualify for CARE under categorical eligibility criteria must provide additional household size and income information to qualify for CARE Plus.
8. Decision 24-05-028 ordered Bear Valley Electric Service to grant exceptions to the Base Services Charge for customers which are not sub-metered, separately-metered electric vehicle rates for customers whose primary meter has an income-graduated fixed charge, and rate schedules that are scheduled to be eliminated by the second quarter of 2026.
9. Bear Valley Electric Service's approaches for Master-Metered and Electric Vehicle customers appear to apply the fixed charge to some customers which should have been granted an exception.
10. The Large Utilities, but not the Small Utilities such as Bear Valley Electric Service, each provided a comprehensive list of their residential rates and whether each rate is a separately-metered electric vehicle rate, a master metered rate that is not sub-metered, or scheduled to be eliminated in 2025 to improve clarity.
11. Through its supplemental data request response, Bear Valley Electric Service provided sufficient information to show that it intends to reduce barriers to CARE Plus enrollment by providing information about the additional steps needed to enroll in CARE Plus

**THEREFORE IT IS ORDERED THAT:**

1. Bear Valley Electric Service's proposal to implement the fixed charge for residential customers as proposed in Advice Letter 495-E and Advice Letter 495-EA and substitute sheets for Advice Letter 495-EA is approved with modifications.
2. The proposal to charge Bear Valley Electric Service domestic multi-family and Sub-Metered units which are not individually metered a Tier 3 Base Services Charge is rejected.
3. Bear Valley Electric Service shall file a Tier 2 Advice Letter at least 90 days before the implementation of the fixed charge with:
  - a. Changes to the volumetric rate components of all residential tariffs active in 2025 (excluding legacy rates), which must include the following:
  - b. Specification of the proposed loading order and cost component breakdown for each tier of the fixed charge utilizing the latest revenue requirement data.
  - c. Updated Bill Impact Rate Analysis workpapers with the updated total ("net") Base Services Charge, including converted adjustment rates.
  - d. Plans to convert volumetric adjustment rates to monthly tiered fixed charges to be layered on top of the base fixed charge to create a "net fixed charge", using the most current values and revenue requirements.
  - e. Updated draft marketing materials
  - f. Revised tariff sheets for every modified rate
  - g. A table clarifying the applicability of the Base Services Charge with each available residential rate by Rate Schedule ID, Common Rate Name, Current Applicability of a Base Services Charge or Minimum Bill, and whether or not customers on this rate schedule will be exempted from an Income-Graduated Fixed Charge.

This Resolution is effective today.

The foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on September 18, 2025; the following Commissioners voting favorably thereon:

ALICE REYNOLDS  
President

DARCIE L. HOUCK  
JOHN REYNOLDS  
KAREN DOUGLAS  
MATTHEW BAKER  
Commissioners

Dated September 18, 2025, at San Francisco, California

## **APPENDICES:**



**Appendix A: Draft CARE Application Submitted April 11, 2025**

**BEAR VALLEY ELECTRIC SERVICE, INC.  
NOTICE AND APPLICATION FOR CALIFORNIA  
ALTERNATE RATES FOR ENERGY (CARE) PROGRAM**

**YOU MAY QUALIFY FOR A DISCOUNT ON YOUR ENERGY BILL**

To apply for a discount at your residence, please fill out this application and mail it to Bear Valley Electric Service, Inc., P.O. Box 1547, Big Bear Lake, CA 92315. You will receive the discount on the next bill after the utility receives and approves your completed and signed application. If you need help filling out the application, or would like more information about the program, call (800) 808-BVES (2837) or visit our office at 42020 Garstin Drive, Big Bear Lake, California 92315.

Other California utilities offer similar bill discounts. Contact your gas utility to receive an application for a discount on your gas bill.

**INCOME REQUIREMENTS**

Effective June 1, 2025 to May 31, 2026		
No. of Persons In Household	CARE Total Gross Annual Income*	CARE Plus Total Gross Annual Income**
1-2	\$42,300	\$21,150
3	\$53,300	\$26,650
4	\$64,300	\$32,150
5	\$75,300	\$37,650
6	\$86,300	\$43,150
7	\$97,300	\$48,650
8	\$108,300	\$54,150
Each Additional Person	\$11,000	\$5,500
*Upper Limit Calculations = 200% of Federal Poverty Guidelines		
**Upper Limit Calculations =100% of Federal Poverty Guidelines		

Under the Income Graduated Fixed Charge rate structure, customers can pay a reduced service charge if enrolled in the CARE or CARE Plus financial assistance program. CARE customers will pay a \$10 service charge and CARE Plus will pay a \$5 service charge.

**WHAT ARE THE QUALIFICATIONS?**

To qualify for the discount, I understand:

- The energy utility bill will be in my name.
- I may not be claimed as a dependent on another person's tax return.
- My total annual income cannot exceed the chart above. *Total income means the gross income of ALL persons living in my home.*
- I will reapply each time I move.
- I will renew my application every two (2) years, or sooner, if requested.
- I will renew my application every year if I am a sub-metered tenant, or sooner, if requested.
- I will notify the utility within 30 days when I become ineligible for CARE or CARE Plus. - I will provide verification of my household income.

For the purpose of the CARE and CARE Plus program the "gross household income" means all money and non cash benefits, available for living expenses, from all sources, both taxable and non taxable, before deductions for all people who live in my home.

This includes, but is not limited to:

- |  |   |  |
|--|---|--|
| <input type="radio"/> Wages or salaries  | <input type="radio"/> Social Security, SSI, SSP                                   | <input type="radio"/> Rental or royalty income                                   |
| <input type="radio"/> Interest or dividends from Savings accounts, stocks or bonds | <input type="radio"/> Scholarships, grants, or other aid used for living expenses | <input type="radio"/> Profit from self-employment (IRS form Schedule C, Line 29) |
| <input type="radio"/> Unemployment benefits  | <input type="radio"/> Disability payments   | <input type="radio"/> Worker's Compensation                                      |
| <input type="radio"/> TANF(AFDC)   | <input type="radio"/> Food Stamps   | <input type="radio"/> Child Support  |
| <input type="radio"/> Pensions   | <input type="radio"/> Insurance settlements                                       | <input type="radio"/> Spousal Support  |
| <input type="radio"/> Gifts  | <input type="radio"/> Legal settlements   | <input type="radio"/> Other Income   |

Proof of income acceptable to the utility will be provided when applying for or renewing application.

**BEAR VALLEY ELECTRIC SERVICE, INC.  
NOTICE AND APPLICATION FOR CALIFORNIA  
ALTERNATE RATES FOR ENERGY (CARE) PROGRAM**

**APPLICATION INFORMATION (please print clearly):**

Applicant Name: \_\_\_\_\_

I am a primary residential customer of Bear Valley Electric Service, Inc.

Bear Valley Electric Account Number:

--	--	--	--	--	--	--	--	--	--	--

Or a sub-metered tenant of a mobile home park or apartment complex.

Master-Metered Account Number:

--	--	--	--	--	--	--	--	--	--	--

There are 2 ways to qualify for CARE:

- You can qualify for CARE if you or someone in your home participates in at least one of the eligible public assistance programs.

OR

- You can also qualify for CARE if you meet the income guideline qualifications listed in the chart for CARE

There is 1 way to qualify for CARE Plus:

- You can also qualify for CARE Plus if you meet the income guideline qualifications listed in the chart for CARE Plus

Service Address: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Telephone No. (home): \_\_\_\_\_ Telephone No. (work): \_\_\_\_\_

Number of Adults Living in Household: \_\_\_\_\_ Number of child(ren) Living in Household: \_\_\_\_\_

Gross Annual Income of Household (Required for CARE Plus): \_\_\_\_\_

By signing below, I certify under penalty of perjury that this information is true and correct under the laws of the state of California. I will provide proof of income and I will notify my energy utility of any changes that affect my eligibility. I understand that this information may be shared with my other energy utility, if applicable.

Customer Signature: \_\_\_\_\_ Date Signed: \_\_\_\_\_

**FOR BEAR VALLEY ELECTRIC SERVICE, INC. USE ONLY**

Date received _____	Date Verified/By _____	Date Effective _____
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## Appendix B: Proposed Base Services Charge Flyer



# The CPUC's New Billing Structure

Governor Gavin Newsom recently enacted state legislation (AB 205), directing the California Public Utilities Commission (CPUC) to modify the structure of electric bills for customers of Investor-Owned Utilities. Under this mandate, Bear Valley Electric Service, Inc. (BVES) must implement a Base Service Charge (BSC) rate structure, which will introduce a fixed rate determined by the customer's income level.

Beginning in Q1 2026, customers will be automatically shifted to the BSC rate structure. This updated state mandate will not apply to commercial property owners.

This updated approach to evaluating electrical service costs will not compromise reliability and BVES' strong commitment to exceptional customer service. Learn more about the new BSC rate structure: [bvesinc.com/BSC](http://bvesinc.com/BSC).

### What will change?

Your current electricity bill includes two main components: a fixed **Service Charge** and a **Volumetric Usage Charge**. The **Service Charge** covers fixed operating costs and investments in the electric grid. This charge remains the same, no matter how much electricity a customer uses. The **Volumetric Usage Charge** is based on the amount of electricity a customer consumes.

The BSC rate structure has been designed to create a fairer distribution of electricity costs. Under this structure, customers will notice:

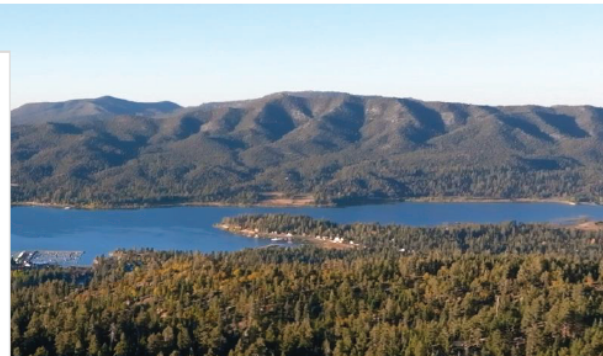


A **higher fixed monthly service charge** determined by customers' income level. The higher fixed service charge is not a new fee.

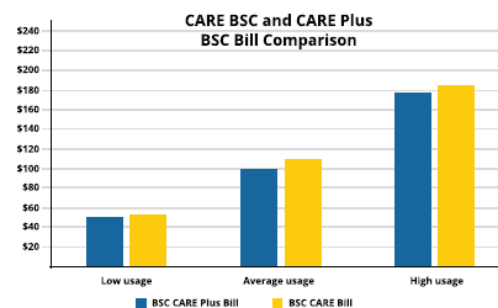
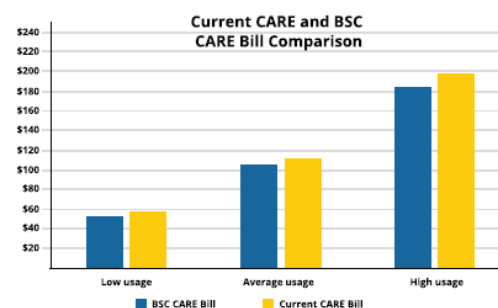
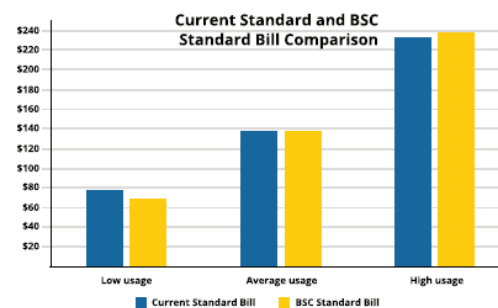


A **reduced electricity usage rate**.

The majority of residential customers will see little to no difference in their average monthly bill.



### Sample Bill Comparisons





### Service Charges

*\*Beginning in Q1 2026, under the BSC rate structure, residential customers will continue to pay a fixed service charge each month. The fixed monthly charges are approximately:*

Standard Customers:

**\$25.24**

CARE Program:

**\$10.83**

CARE Plus Program

**\$5.77**



### Financial Assistance Programs:

BVES proudly offers assistance for low-income customers who qualify for the financial assistance programs.

Under the BSC rate structure, customers enrolled in the CARE or CARE Plus financial assistance programs can benefit from reduced charges.

#### ► California Alternate Rates for Energy (CARE) Program:

Customers who are eligible for the CARE program are encouraged to apply now. Those already enrolled in the CARE Program will continue receiving a discount under the Base Service Charge rate structure. Additionally, current CARE Program customers can apply for the CARE Plus program.

#### ► California Alternate Rates for Energy (CARE) Plus Program:

CARE Plus is a new program for qualifying low-income households that will provide an additional discount on their monthly electric bills. Customers who currently receive CARE benefits may be eligible for a further discount. Customers can apply for the CARE Plus Program now, but action **is required**.

Learn more about our Assistance Programs: [bvesinc.com/customer-service/assistance-programs](https://www.bvesinc.com/customer-service/assistance-programs).



Learn about your eligibility for the CARE, CARE Plus and other financial assistance programs by scanning the QR code.

Our customer service representatives are standing by to assist you with any questions. For 24-hour customer service, please call: 1-800-808-2837. For more information, visit: [bvesinc.com](https://www.bvesinc.com).

## Appendix C: Base Services Charge Website Landing Page

### Base Services Charge – Introducing the CPUC’s New Billing Structure

Recently, Governor Gavin Newsom signed state legislation (AB 205) mandating the California Public Utility Commission (CPUC) change the structure of electric bills for Investor-Owned Utility customers. The CPUC requires Bear Valley Electric Service, Inc. (BVES) to adopt a Base Services Charge (BSC) rate structure where customers pay a Base Services Charge based on their income.

Customers will automatically be transitioned to the BSC rate structure in Q1 2026. This new state mandate will not apply to commercial property owners.

BVES remains committed to providing safe and reliable electric service to the Big Bear community. This new way of assessing electrical service costs will not compromise the grid's reliability and BVES' commitment to superior customer service.

### **Overview**

Your current electricity bill includes a **Base Services Charge** and a **Usage Charge**. The **Base Services Charge** covers fixed operating costs and investments in the electric grid – a cost that will not change regardless of how much electricity a customer consumes. The **Usage Charge** is determined by how much electricity a customer consumes.

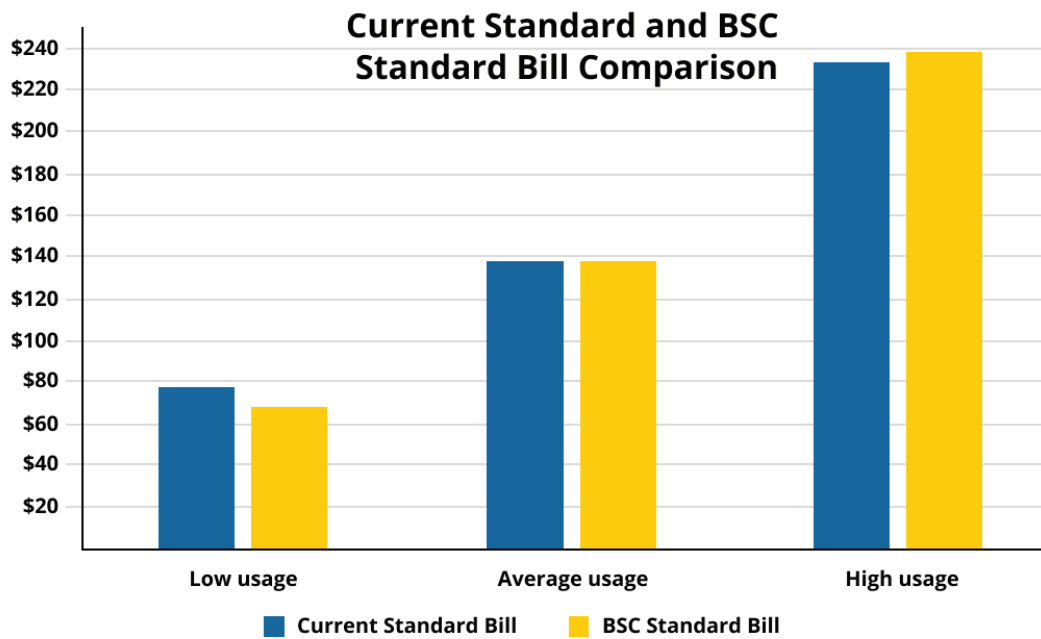
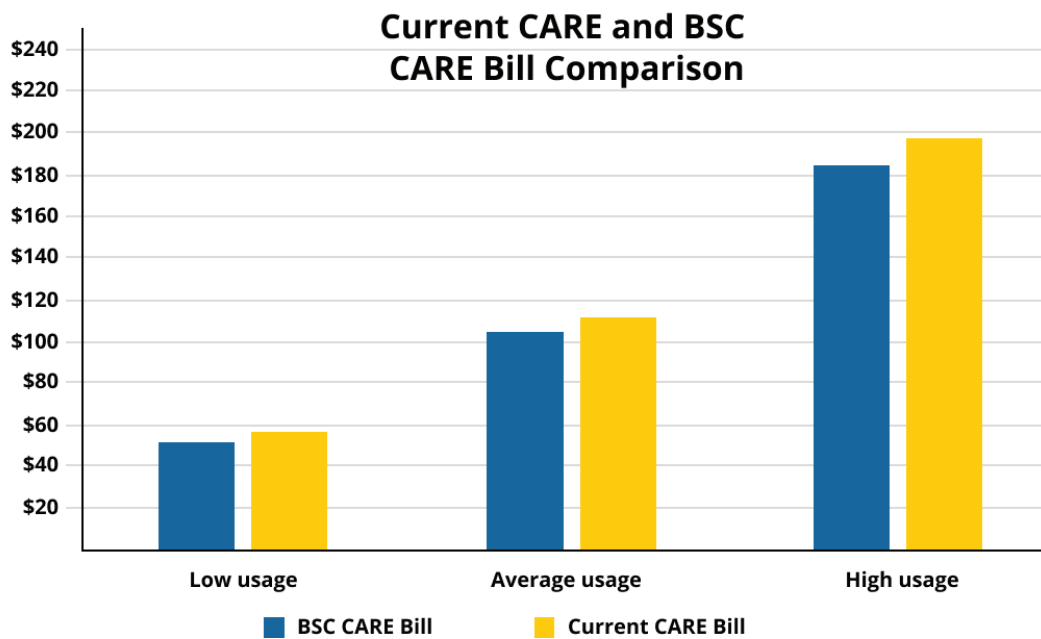
The BSC rate structure is designed to provide a more equitable distribution of electricity costs. This means customers can expect to see:

- A higher fixed monthly service charge determined by customers' income level
- A reduced electricity usage rate, lowering energy costs for most customers

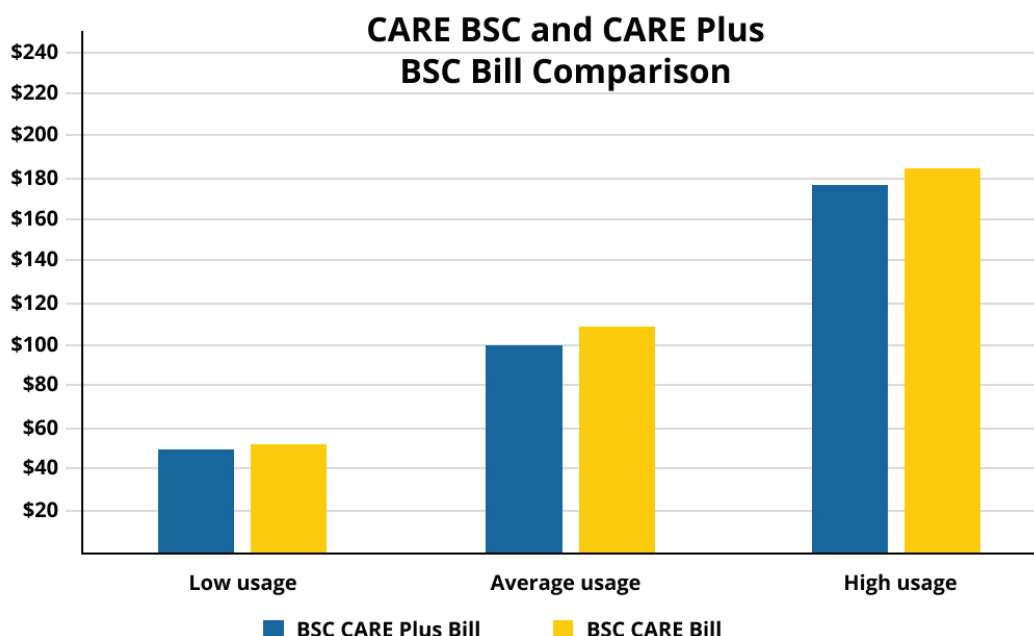
The higher fixed service charge is not a new fee – it simply shifts how existing costs are shared by customers. The majority of residential customers will see little to no impact on their monthly bill.

### **How will this impact BVES customers?**

#### *Average Customer Example Bill*

*CARE Program Customer Example Bill**CARE Plus Program Customer Example Bill*





### **Service Charges**

*\*Under the BSC rate structure in Q1 2026, customers will pay the same service charge unless enrolled in the **CARE** or **CARE Plus** financial assistance programs.*

- Standard Customers: \$23.22
- CARE Program: \$ 10.06
- CARE Plus Program: \$5.00

### **Financial Assistance Programs:**

BVES proudly offers assistance for low-income customers who qualify for the financial assistance programs.

Under the BSC rate structure, customers can pay a reduced service charge if enrolled in the CARE or CARE Plus financial assistance programs.

- **California Alternate Rates for Energy (CARE) Program:** Eligible customers enrolled in the CARE program will see a 20% discount on monthly electric bills.
- **California Alternate Rates for Energy (CARE) Plus Program:** CARE Plus is a new program for qualifying low-income households that will provide an additional discount on their monthly electric bills. Customers who currently receive CARE benefits may be eligible for a further discount. Customers can apply for the CARE Plus Program now, but action **is required**.

Learn about your eligibility for the CARE, CARE Plus and other financial assistance programs by visiting our [Assistance Programs](#) page.

### **Frequently Asked Questions**

<<Begin dropdown>> (Each question will have its individual dropdown window)

**Why is BVES's rate structure changing?**

Governor Gavin Newsom signed state legislation ([AB 205](#)) mandating the California Public Utility Commission (CPUC) to change the way residential customers' electric bills are structured for the Investor-Owned Utilities. Due to this decision, the CPUC is requiring Bear Valley Electric Service, Inc. (BVES) to adopt an Base Services Charge (BSC) rate structure where customers pay a Base Services Charge based on income.

**How does the BSC rate structure work?**

Your current electricity bill includes a **Base Services Charge** and a **Usage Charge**. The **Base Services Charge** covers fixed operating costs and investments in the electric grid – A cost that will not change regardless of how much electricity a customer consumes. The **Usage Charge** is determined by how much electricity a customer consumes.

The BSC rate structure is designed to provide a more equitable distribution of electricity costs. This means customers can expect to see:

- A higher fixed monthly service charge determined by customers' income level
- A reduced electricity usage rate, lowering energy costs for most customers

**When will BSC rate structure take effect on customers' bills?**

The BSC rate structure will begin in Q1 of 2026.

**Does the BSC rate structure apply to all customers?**

This new state mandate will impact all residential customers. That includes homeowners and renters, including those with or without solar panels. This new state mandate will not apply to commercial property owners.

**Will I be paying more under the BSC rate structure?**

The higher fixed service charge is not a new fee – It simply shifts how existing costs are shared by customers. The majority of customers will see little to no impact on their monthly bill.

**What do I need to do?**

You will be automatically transitioned to the BSC rate structure in Q1 of 2026. Customers enrolled in the CARE Program will automatically receive a discount on the fixed service charge. No action is required to existing qualified CARE Customers. However, if you believe you qualify for additional savings through the CARE Plus program beginning in 2026, action is required for customers to apply for the CARE Plus Program.

Learn more by visiting our [Assistance Programs](#) webpage.

**How do I qualify for a discounted service charge?**

Under the BSC rate structure, customers can pay a reduced service charge if enrolled in the CARE or CARE Plus financial assistance programs.

- **California Alternate Rates for Energy (CARE) Program:** Eligible customers enrolled in the CARE program will see a 20% discount on monthly electric bills.
- **California Alternate Rates for Energy (CARE) Plus Program:** CARE Plus is a new program for qualifying low-income households that will provide an additional discount on their monthly electric bills. Customers who currently receive CARE benefits may be eligible for a further discount. Customers can apply for the CARE Plus Program now, but action **is required**.

Learn about your eligibility for the CARE, CARE Plus and other financial assistance programs by visiting our [Assistance Programs](#) page.

### **Will utilities make more money under the BSC rate structure?**

No. Electricity providers like BVES will not make additional profit for operating and protecting the electric grid under the BSC rate structure.

### **How will the BSC rate structure affect customers who use solar panels?**

Solar customers will see the base fixed service charge on their bill. This is a standard charge that applies to all residential customers, including those with solar panels.

### **How will the BSC rate structure benefit BVES customers?**

On average, all low-income customers enrolled in CARE or CARE Plus will save on their monthly electricity bills due to a reduced fixed service charge. Standard residential customers will see little to no impact on their monthly bill.

The rate reduction helps to make it more affordable for customers to use electric vehicles, stovetops, heat pumps and other clean energy solutions aligned with the state's focus to transition to cleaner energy options regardless of customer's income or location. The increased focus on the fixed charge of your bill also aims to keep your electricity bill more stable and less volatile on a month-to-month basis.

<<End of dropdown>>

### **Questions? We're Here to Help.**

If you have any questions, our Customer Service team is here to help. For 24-hour customer service, you can reach us at **1-800-808-2837** or email [customerservice@bvesinc.com](mailto:customerservice@bvesinc.com).



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

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

Utility type:

☒ ELC ☐ GAS ☐ WATER  
☐ PLC ☐ HEAT

Contact Person: Jeff Linam

Phone #: (909) 394-3600 x664

E-mail: RegulatoryAffairs@bvesinc.com

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

### EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 495-EA

Tier Designation: Tier 3

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

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☐ One-Time ☒ Other:

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

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

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

Confidential treatment requested? ☒ Yes ☐ No

If yes, specification of confidential information: Confidential vendor quotes in Appendix B  
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: Jeff Linam, regulatoryaffairs@bvesinc.com

Resolution required? ☐ Yes ☒ No

Requested effective date: 10/1/24

No. of tariff sheets: 0

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Jeff Linam  
Title: Regulatory Affairs Manager  
Utility Name: Bear Valley Electric Service, Inc.  
Address: 630 E. Foothill Blvd  
City: San Dimas State: California  
Telephone (xxx) xxx-xxxx: (909) 394-3600 x664  
Facsimile (xxx) xxx-xxxx:  
Email: [RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com); [Jeff.Linam@gswater.com](mailto: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  
Telephone (xxx) xxx-xxxx: (909) 394-3600 x497  
Facsimile (xxx) xxx-xxxx:  
Email: [RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com); [alicia.menchaca@bvesinc.co](mailto:alicia.menchaca@bvesinc.co)

Clear Form



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

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

### PURPOSE

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

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

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

**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.”<sup>1</sup> Phase 1, Track A of the proceeding is scoped to address how the Commission should authorize an income-graduated fixed charge (“Fixed Charge”) in accordance with AB 205.<sup>2</sup>

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

**DISCUSSION**

As directed by AB 205, the Decision authorizes all IOUs to change the structure of residential customer bills by shifting the recovery of a portion of fixed costs from volumetric rates to a separate, fixed amount on bills without changing the total costs that utilities may recover from customers. As a result, the Fixed Charge reduces the average residential volumetric price of electricity (in cents per kilowatt hour) of IOUs. The Decision adopts a gradual approach to implementing AB 205 requirements, including the requirement to offer income-graduated fixed charge amounts. The

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<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](mailto: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](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

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

<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](mailto:EDTariffUnit@cpuc.ca.gov)

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

Bear Valley Electric Service, Inc.

Regulatory Affairs

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

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

**Correspondence:**

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

Jeff Linam

Manager, Regulatory Affairs

Bear Valley Electric Service, Inc.

630 East Foothill Blvd.

San Dimas, California 91773

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

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

Sincerely,

/s/ Alicia Menchaca

Alicia Menchaca

Rate Analyst, Regulatory Affairs

Bear Valley Electric Service, Inc.

cc: Jenny Au, Energy Division

R. Mark Pocta, California Public Advocates Office  
BVES General Order 96-B Service List  
Service list for R.22-07-005

## APPENDIX A

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

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

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

**1.1 Fixed Charge Tier Structure**

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

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

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

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

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

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

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

## **1.2 Removal of Minimum Bills**

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

## **1.3 Implementation Timing and Approach**

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

## **1.4 Community Choice Aggregator Coordination**

BVES does not have any CCAs in its service territory.

## **1.5 Customer Support Resources**

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

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

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

### **1.6 Measurement and Evaluation**

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

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

BVES will meet the required metrics as follows:

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

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

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

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



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

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

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

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

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

BVES’s ME&O strategies include:

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

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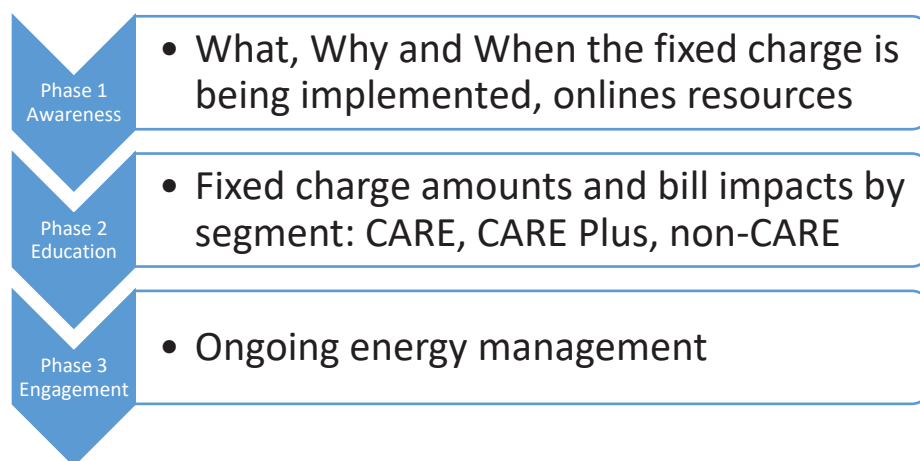
<sup>3</sup> D.24-05-028, p. 122

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

## 2.2 Over-Arching Phased Approach

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

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



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

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

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

## 2.3 Messaging

### **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 in-depth information on bill impacts will be added before direct communications are deployed. The web is an important channel to support and educate as many customers as possible and is a convenient source of self-service information. It is also a key resource to help reduce the volume of follow-up calls to BVES's Customer Care Center. When customer communications begin, web content will include segmented bill samples showing monthly totals before and after the Fixed Charge is implemented.

## 2.10 Existing Media Channels

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

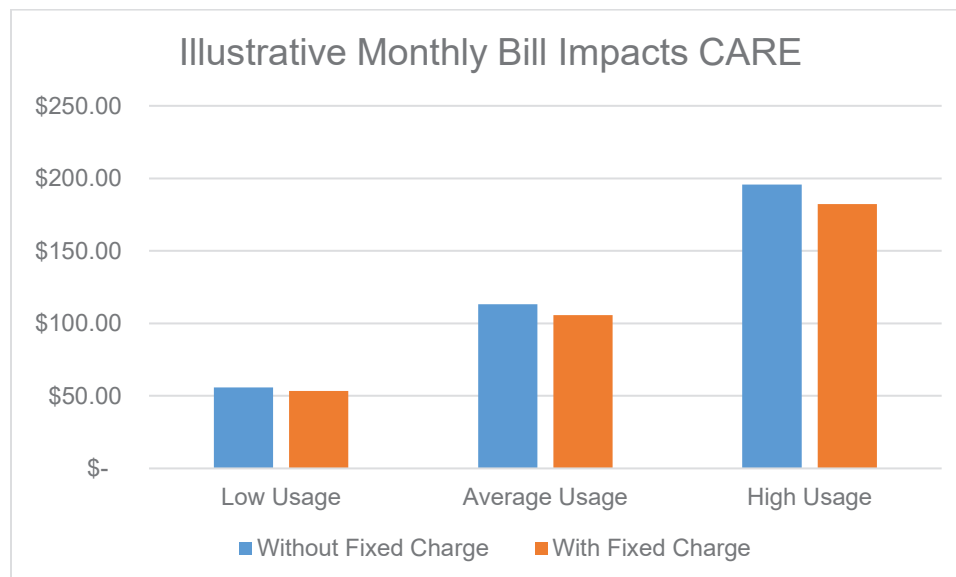
- a. **Bill Inserts:** BVES will leverage customer bill inserts prior to implementation and periodically throughout 2026. These tactics will help educate customers at the point at which they may be the most engaged. A brief explanation can guide customers to a website for more in-depth information.
-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

## 2.11 Direct Notification

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



## II. Figure 2: BVES Bill Impacts



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

### 2.12 Community Engagement and Outreach

#### a. Community Based Organizations

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

#### b. Employee Outreach

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

### c. External Stakeholders

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

### 2.13 Paid Media

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

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

### 2.14 Reporting and Metrics

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

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

### 2.15 ME&O Budget

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

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

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

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

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

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

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

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

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

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

### **3. Tier Assignment**

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

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

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

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

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

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

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

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

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

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

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

### **3.5 Exempt Rate Schedules**

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

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

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



#### **4. Rate Design**

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

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

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

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

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

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

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

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

**Figure 1**

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

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

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

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

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

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

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

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

#### 4.3 BVES' Proposed Income-Graduated Fixed Charges

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

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

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

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

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

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

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

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

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

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

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

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

Figure 5: Customer Bill Impacts (Tier 2 CARE)

CARE Rate - Tier 2							
Bill Impact Analysis Total Rates	Monthly Usage (kWh)	IGFC Bill \$	Proposed TY2023 GRC Bill \$	Bill Increase / (Decrease) \$	Bill Increase / (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	176.9	\$ 44.33	\$ 45.89	\$ (1.56)	-3.40%		
25% Below Avg. Usage	265.3	61.46	64.79	(3.32)	-5.13%		
Average Usage	353.7	80.13	85.34	(5.21)	-6.11%		
25% Above Avg. Usage	442.1	103.98	111.35	(7.37)	-6.62%		
50% Above Avg. Usage	530.6	134.29	144.01	(9.72)	-6.75%		
Monthly Average Usage	400.4	\$ 92.89	\$ 99.25	\$ (6.36)	-6.40%		

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

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

Care Plus Rate - Tier 1							
Bill Impact Analysis Total Rates	Monthly Usage (kWh)	IGFC Bill \$	Proposed TY2023 GRC Bill \$	Bill Increase / (Decrease) \$	Bill Increase / (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 shows monthly bill impacts for Tier 1 CARE Plus customers. The Figure shows bill decreases under the IGFC rate design as compared to the proposed rate design in the GRC proceeding for Tier 1 CARE Plus customers who use on average 447 kWh during the winter months and 354 kWh during the summer month.

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

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

##### Requirement 1

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

##### Response 1

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



**Requirement 2**

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

**Response 2**

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

**Requirement 3**

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

**Response 3**

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

**Requirement 4**

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

**Response 4**

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

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

**Requirement 5**

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

**Response 5**

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

**Requirement 6**

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

**Response 6**

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

#### 4.5 Revisions to Eligible Tariffs

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

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

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

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

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

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

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

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

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

(\$0.47)

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

The following tariff revisions will be incorporated:

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

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

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

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

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

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

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

**RATES****SERVICE CHARGES PER METER, PER DAY**

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

<u>SUMMER</u>	Base <sup>1</sup>	BasAdj <sup>2</sup>	Trans <sup>3</sup>	Supply <sup>4</sup>	SupplyAdj <sup>5</sup>		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
<u>WINTER</u>	Base <sup>1</sup>	BasAdj <sup>2</sup>	Trans <sup>3</sup>	Supply <sup>4</sup>	SupplyAdj <sup>5</sup>		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

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

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

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

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

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

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

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

**MINIMUM CHARGE**

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

## 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](mailto: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  
Marconi** 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	



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 #:** [REDACTED]

**Sales Contact:** Eric Schultz [REDACTED] @transperfect.com)

**Invoice Date:** 09/22/2020

**Payment Terms:** Net 30

**Invoice Due:** 10/22/2020

**Contract #:** US08 [REDACTED]

**Purchase Order #:**

**Project Notes:**

Wildfire Translations

Description	Quantity	Unit	Unit Cost(US\$)	Extended Cost(US\$)
<b>English into Spanish (US)</b> Trans./Edit/Proof.	1.00	Minimum	[REDACTED]	[REDACTED]
<b>English into French (FR)</b> Trans./Edit/Proof.	1.00	Minimum	[REDACTED]	[REDACTED]
<b>English into Chinese (T-US)</b> Trans./Edit/Proof.	1.00	Minimum	[REDACTED]	[REDACTED]
<b>English into Vietnamese</b> Trans./Edit/Proof.	1.00	Minimum	[REDACTED]	[REDACTED]
<b>English into Tagalog</b> Trans./Edit/Proof.	1.00	Minimum	[REDACTED]	[REDACTED]
<b>MIXTECO</b> Trans./Edit/Proof.	1.00	Flat	[REDACTED]	[REDACTED]
<b>ZAPATECO</b> Trans./Edit/Proof.	1.00	Flat	[REDACTED]	[REDACTED]
Project Management	1.00	Flat	[REDACTED]	[REDACTED]

**Total to Bill This Contract:** US [REDACTED]

**Tax Amount:** [REDACTED]

**Total Amount Due:** [REDACTED]

UNPAID



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

August 12, 2024

Bear Valley Electric Service  
[REDACTED] Re  
Accounts Payable  
Big Bear Lake, CA 92315



Estimate ID: [REDACTED]  
Calculation ID: [REDACTED]

Dear [REDACTED]

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

<b><u>Project Name:</u></b>	<b><u>Postcard</u></b>
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

<b>Price for 23,500 pcs.</b>	[REDACTED]	[REDACTED]
<b>Price for 47,000 pcs.</b>	[REDACTED]	[REDACTED]
<b>Estimated Pre Sort Standard</b>	[REDACTED]	[REDACTED]
<b>Postage per Run 23,142</b>	[REDACTED]	[REDACTED]

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  
[REDACTED]@jameslitho.com)

Quote

**Boosted Post Strategy**

<b>Title of Boosted Post:</b> Customer Service Supervisor Employment Opportunity		
<b>Button:</b> Learn More	<b>Website Link:</b> [REDACTED]	
<b>Audience:</b> 40.8K - 48K		
<b>Location Ranges:</b> <ul style="list-style-type: none"><li>42020 Garstin Dr, Big Bear Lake, CA + 15 mi</li></ul>	<b>Age:</b> 18+	
<b>Other targeting:</b> N/A		
<b>Daily Reach:</b> Pending tier decision (see below)	<b>Day Span:</b> 14 days	<b>Budget:</b> Pending tier decision (see below)

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

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

Best,

**Noah Rodriguez**  
Account Executive

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

**RANDLE**  
COMMUNICATIONS

Franklin Lee Enterprises, L.L.C.

2419 Imperial Business Park Drive  
Imperial, CA 92251  
+1 7603551500  
[REDACTED]@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 [REDACTED]  
DATE 05/06/2024  
TERMS Net 30  
DUE DATE 06/05/2024

PROJECT NUMBER(S)  
[REDACTED]

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
04/30/2024	Web Development Services	Contract # [REDACTED] On-Going Development - various CMS, Content and Design updates, including WMP/PSPS/CAAP and EV CTA	6.50	[REDACTED]	[REDACTED]

Thank you for choosing us, to be a part of your critical Communications team!

SUBTOTAL	[REDACTED]
TAX	0.00
TOTAL	[REDACTED]
BALANCE DUE	[REDACTED]



Franklin Lee Enterprises, L.L.C.

2419 Imperial Business Park Drive  
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[redacted]@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 [redacted]  
DATE 06/12/2024  
TERMS Net 30  
DUE DATE 07/12/2024

PROJECT NUMBER(S)  
[redacted]

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
05/31/2024	Web Development Services	Contract # [redacted] On-Going Development - various CMS, Content and Design updates - EV CTA	15	120.00	[redacted]

Thank you for choosing us, to be a part of your critical Communications team!

SUBTOTAL	[redacted]
TAX	0.00
TOTAL	[redacted]
BALANCE DUE	[redacted]

Franklin Lee Enterprises, L.L.C.

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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 [REDACTED]  
DATE 06/30/2024  
TERMS Net 30  
DUE DATE 07/30/2024

PROJECT NUMBER(S)  
[REDACTED]

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
06/30/2024	Web Development Services	Contract # [REDACTED], On-Going Development - various CMS, Content and Design updates - EV CTA	13	[REDACTED]	[REDACTED]
06/30/2024	Web Development Services	Contract # [REDACTED], On-Going Development - various CMS, Content and Design updates	7	[REDACTED]	[REDACTED]

Thank you for choosing us, to be a part of your critical Communications team!

SUBTOTAL	[REDACTED]
TAX	0.00
TOTAL	[REDACTED]
BALANCE DUE	[REDACTED]

**Sent:** Thursday, June 13, 2024 9:41 AM

**To:** Rogers, Darlene <D[REDACTED]@gswater.com>

**Cc:** Delia Rocha <[REDACTED]@kubra.com>; Christina Xenias <[REDACTED]@kubra.com>; Patty Martinez <[REDACTED]@kubra.com>; KUBRA Client Support <[REDACTED]@kubra.com>; Medina-Stephens, Gabrielle <[REDACTED]@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 <[DMROGERS@gswater.com](mailto:DMROGERS@gswater.com)> wrote:

Thank you

**Darlene Rogers**

Oracle CC&B Billing Systems Analyst  
Golden State Water Company  
(909) 394-3600 ext. 608  
[\[REDACTED\]@gswater.com](mailto:[REDACTED]@gswater.com)

**From:** Brian Silva <[REDACTED]@kubra.com>

**Sent:** Tuesday, June 11, 2024 1:11 PM

**To:** Rogers, Darlene <[REDACTED]@gswater.com>

**Cc:** Delia Rocha <[REDACTED]@kubra.com>; Christina Xenias <[REDACTED]@kubra.com>; Patty Martinez <[REDACTED]@kubra.com>; KUBRA Client Support <[REDACTED]@kubra.com>; Medina-Stephens, Gabrielle <[REDACTED]@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,

I should have a quote for you within 24 hours

Thanks

On Tue, Jun 11, 2024 at 10:57 AM Rogers, Darlene <[REDACTED]@gswater.com> wrote:

Thank you

**BEAR VALLEY ELECTRIC SERVICE, INC.**

**G.O. 96-B**

**SERVICE LIST**

AGNES ROBERTS, FINANCIAL ANALYST  
[AGNES.ROBERTS@BBCCSD.ORG](mailto:AGNES.ROBERTS@BBCCSD.ORG)  
EMAIL ONLY

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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  
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385 N. ARROWHEAD AVENUE - 2<sup>ND</sup> 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

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OFFICE OF THE ATTORNEY GENERAL  
STATE OF CALIFORNIA  
300 SOUTH SPRING STREET  
LOS ANGELES, CA 90013

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California  
Public Utilities  
Commission



[CPUC Home](#)

## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

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**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.

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

RICHARD TABORS, DR.  
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TABORS CARAMANIS RUDKEVICH  
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NEWTON, MA 02458  
FOR: TABORS CARAMANIS RUDKEVICH

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

C. BAIRD BROWN  
ATTORNEY  
ECO(N)LAW LLC  
230 S. BROAD STREET, 17TH FL.  
PHILADELPHIA, PA 19102  
FOR: MICROGRID RESOURCES COALITION (MRC)

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1010 VERMONT AVE., NW, STE. 1050  
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(FORMERLY ADVANCED ENERGY ECONOMY)

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FOR: KALUZA US LLC

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WAUKESHA, WI 53189  
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ENCHANTED ROCK, LLC  
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FOR: ENCHANTED ROCK

JACOB SCHLESINGER  
COUNSEL  
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1580 LINCOLN ST., STE. 1105  
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FOR: SAN DIEGO COMMUNITY POWER (SDCP)  
AND CLEAN ENERGY ALLIANCE (CEA)

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FOR: EVGO SERVICES, LLC

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MICHAEL KOHANIM  
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FOR: UNIVERSAL DEVICES

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RONALD MOORE  
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COMPANY

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FOR: SAN DIEGO GAS AND ELECTRIC



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15445 INNOVATION DRIVE  
SAN DIEGO, CA 92128  
FOR: POWERFLEX INC.

BOAZ UR  
CHIEF BUSINESS DEV. OFFICER  
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IRVINE, CA 92612  
FOR: NOSTROMO ENERGY, INC.

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DEPUTY DIR  
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FOR: GRIDTRACTOR INC.  
FOR: TEMIX INC.

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FOR: MAINSPRING ENERGY, INC.

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EMPLOYEES

MEGAN DELAPORTA  
CALIF PUBLIC UTILITIES COMMISSION  
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AREA  
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SAN FRANCISCO, CA 94102-3214  
FOR: PUBLIC ADVOCATES OFFICE

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FOR: SMALL BUSINESS UTILITY ADVOCATES

NATURAL RESOURCES DEFENSE COUNCIL  
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SAN FRANCISCO, CA 94104  
FOR: NATURAL RESOURCES DEFENSE COUNCIL

RACHEL MCMAHON  
VICE PRESIDENT, POLICY  
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EMAIL ONLY  
EMAIL ONLY, CA 94104  
FOR: CALIFORNIA ENERGY STORAGE ALLIANCE  
(CESA)

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AND USERS COALITION

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ATTORNEY AT LAW  
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**ADVICE LETTER (AL) SUSPENSION NOTICE**  
**ENERGY DIVISION**

Utility Name: Bear Valley Electric Service, Inc.

Date Utility Notified: 2/10/2025

Utility Number/Type: 913-E

[X] E-Mailed to: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov),

Advice Letter Number(s): 495-E, 495-E-A

ED Staff Contact: Cherie Chan

Date AL(s) Filed: September 12, 2024

ED Staff Email: [cyc@cpuc.ca.gov](mailto:cyc@cpuc.ca.gov)

Utility Contact Person: Jeff Linam

ED Staff Phone No.: 415-703-1779

Utility Phone No.: (909) 394-3600 x664

**[X] INITIAL SUSPENSION (up to 120 DAYS from the expiration of the initial review period)**

This is to notify that the above-indicated AL is suspended for up to 120 days beginning 10/12/2024 for the following reason(s) below. If the AL requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division extends beyond the expiration of the initial suspension period, the advice letter will be automatically suspended for up to 180 days beyond the initial suspension period.

[ ] A Commission Resolution is Required to Dispose of the Advice Letter

[ ] Advice Letter Requests a Commission Order

[X] Advice Letter Requires Staff Review

---

The expected duration of initial suspension period is 120 days

---

**[ X ] FURTHER SUSPENSION (up to 180 DAYS beyond initial suspension period)**

The AL requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division has extended beyond the expiration of the initial suspension period. The advice letter is suspended for up to 180 days beyond the initial suspension period.

---

If you have any questions regarding this matter, please contact Cherie Chan at [cyc@cpuc.ca.gov](mailto:cyc@cpuc.ca.gov).

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**ADVICE LETTER (AL) SUSPENSION NOTICE**  
**ENERGY DIVISION**

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Date Utility Notified: 2/10/2025

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The AL requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division has extended beyond the expiration of the initial suspension period. The advice letter is suspended for up to 180 days beyond the initial suspension period.

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If you have any questions regarding this matter, please contact Cherie Chan at [cyc@cpuc.ca.gov](mailto:cyc@cpuc.ca.gov).

cc:

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