



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) #: 514-E

Tier Designation: Tier 2

Subject of AL: Preliminary Statement, Part VV - Electric Vehicle Infrastructure Memorandum Account Update

Keywords (choose from CPUC listing): Memorandum Account

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

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution No. E-5168

Does AL replace a withdrawn or rejected AL?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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

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

Resolution required? ☐ Yes ☒ No

Requested effective date: 4/21/25

No. of tariff sheets: 2

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

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

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

Tariff schedules affected: Preliminary Statement Part VV- Electric Vehicle Infrastructure Memorandum Account, TOC Page 1

Service affected and changes proposed¹: N/A

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

¹Discuss 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

Name: Jeff Linam
Title: Regulatory Affairs Manager
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Telephone (xxx) xxx-xxxx: (909) 394-3600 x664
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Email: RegulatoryAffairs@bvesinc.com; Jeff.Linam@gswater.com

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Clear Form



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A Subsidiary of American States Water Company

April 21, 2025

Advice Letter No. 514-E

(U 913 E)

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

<u>CPUC Sheet No</u>	<u>Title of Sheet</u>	<u>Canceling CPUC Sheet No.</u>
Revised No. 3604-E	Preliminary Statement Electric Vehicle Infrastructure Memorandum Account, Part VV	Revised No. 3134-E
Revised No. 3605-E	Table of Contents, Page 1	Revised No. 3603-E

In accordance with the California Public Utilities Commission ("Commission" or "CPUC") General Order No. 96-B, BVES is hereby seeking authorization to modify its Electric Vehicle Infrastructure Memorandum Account ("EVIMA") which tracks the BVES-incurred costs of all electrical distribution infrastructure on the utility side of the customer's meter for all customers (excluding single-family resident customers) installing separately metered infrastructure to support charging stations. This authority was granted to energy utilities pursuant to Assembly Bill ("AB") 841 (Stats. 2020, Ch. 372) and Resolution No. E-5168. The requested modifications to the EVIMA (1) extends the period of applicability for the memo account as a result of new developments regarding electrical distribution infrastructure projects to support charging stations within BVES's service territory that were unforeseen when BVES filed its last general rate case application on August 30, 2022, and (2) requires costs booked into the EVIMA to be reviewed for reasonableness in BVES's general rate cases ("GRC").¹ The requested modifications do not change any other aspects of the EVIMA as initially intended by AB 841 and Resolution No. E-5168.

¹ AB 841 provides for cost recovery in GRC proceedings.

Background

The Legislature stated in AB 841 that it is the policy of the State and the intent of the Legislature to encourage transportation electrification as a means to achieve ambient air quality standards and the state's climate goals, and that the Commission shall approve programs and investments in transportation electrification, including those that deploy charging infrastructure, via a "reasonable cost recovery mechanism."

On March 1, 2021, BVES filed Advice Letter ("AL") 413-E to establish a new Rule 24 and the EVIMA to track the costs associated with offering Rule 24 service/projects. This AL was filed pursuant to AB 841, which directed investor-owned utilities ("IOUs") to file ALs to establish a new tariff or rule that authorizes each IOU to design and deploy all electrical distribution infrastructure on the utility side of the meter for all separately metered infrastructure supporting charging stations, other than those in single-family residences. Resolution No. E-5168, issued October 11, 2021, approved with modifications BVES's requests in AL 413-E to establish Rule 24 and the EVIMA.

The Preliminary Statement (Part VV) for the EVIMA states the following, in relevant part:

This memo account applies to costs incurred by BVES related to electric vehicle infrastructure installed under the provisions of Rule 24 between January 1, 2021, and the implementation date of BVES's next general rate case, currently anticipated to be April 2022. * * *

Costs tracked in the EVIMA shall be separately reviewed for reasonableness in BVES's next general rate case or any other proceeding deemed appropriate by the Commission and, upon approval, transferred to the Distribution subaccount of the Base Revenue Requirement Balancing Account (BRRBA) for recovery in customers' rates.

During the current EVIMA applicability period of January 1, 2021 and the filing of BVES's 2023 GRC (August 2022), BVES did not receive any Rule 24 applications for electric vehicle ("EV") charging infrastructure.² As a result, BVES had no valid basis to request costs to be included in its GRC filing covering the current GRC cycle of 2023-2026. Accordingly, no Rule 24 revenues are currently in BVES 2023-2026 GRC rates.

Subsequent to the current EVIMA applicability period, three potential Rule 24 projects have undergone early stages of development. To date, however, no Rule 24 applications have

² Under an EV charging infrastructure pilot program implemented in 2018, BVES received only two requests -- both from the City of Big Bear Lake. Not a single private/commercial request was received during the pilot program.

been submitted nor related contracts executed regarding these three potential Rule 24 projects. Preliminary estimates of BVES's costs for these three potential Rule 24 projects total approximately \$540,000, which represents approximately 5% of BVES's annual capital budget for 2025.

Given this relatively recent surge in potential Rule 24 projects, BVES could be required to incur even more costs than \$540,000 for additional Rule 24 projects before the next GRC cycle begins January 1, 2027. Nearly all of BVES's current capital project GRC revenues are dedicated to constructing critical wildfire mitigation projects in accordance with BVES's approved Wildfire Mitigation Plan ("WMP"). Diverting such GRC funds from WMP projects to Rule 24 projects could lead to diminished wildfire mitigation and penalties and fines due to BVES's failure to substantially comply with its WMP requirements. Nor would such action be in the public interest. Both WMP and Rule 24 projects are designed to support and achieve important State/Legislative objectives.

The Legislature never intended for Rule 24 costs to be unrecovered by IOUs. As previously noted, AB 841 specifically stated that costs resulting from EV charging infrastructure should be recovered via a "reasonable cost recovery mechanism." Through no fault of BVES or the Commission, BVES currently has no "reasonable cost recovery mechanism" for Rule 24 projects. But compliance with this AB 841 requirement can be easily and quickly rectified by two narrow, simple modifications to BVES's EVIMA discussed below.

Even if the two narrow, simple modifications to BVES' existing EVIMA is viewed as a new memorandum account, Commission precedent supports such modifications. The Commission has declared that a request to establish a memorandum account

[f]alls within the broad outline of the acceptable uses of memorandum accounts [where an applicant] seek[s] to track and record incremental costs that, for various reasons, could not be included in [its] GRC or other ratemaking applications.³

The Commission has further concluded that where, for purposes of complying with a legal or regulatory obligation

[t]he utility is already incurring costs or expect to soon [but] is unable to rely on its GRC to collect costs in rates * * * a memorandum account is the appropriate mechanism to provide the utilit[y] the opportunity to recover costs in rates, provided these costs are found reasonable, to avoid retroactive ratemaking."⁴

³ D.19-09-026, p. 6.

⁴ Id., pp. 6-7

Request

BVES anticipates that it will construct at least three Rule 24 projects within the 2025-2026 time-period, and believes that it is just and reasonable and consistent with Commission decisions for the full revenue requirement associated with the capital costs to construct these EV infrastructure projects be tracked in the EVIMA. BVES requests that the language included in the currently approved EVIMA be modified to (1) update the applicability timeline to extend from the date of this Advice Letter to January 1, 2027, which is the date that new rates will take effect in BVES's next GRC filing, and (2) require costs booked into the EVIMA to be reviewed for reasonableness in BVES's GRCs. To be clear, BVES understands and agrees that recovery of such EVIMA costs will not be automatic. In addition, future Rule 24 project costs (beginning January 1, 2027) will be included in forecasted costs for future GRC rate periods, including the 2027-2030 GRC rate period.

The relevant revised language in the Preliminary Statement would read as follows:

This memo account applies to costs incurred by BVES related to electric vehicle infrastructure installed under the provisions of Rule 24 between April 21, 2025 and January 1, 2027, the implementation date of BVES's 2027-2030 general rate case. * * *

Costs tracked in the EVIMA shall be separately reviewed for reasonableness in BVES's general rate cases or any other proceeding deemed appropriate by the Commission and, upon approval, transferred to the Distribution subaccount of the Base Revenue Requirement Balancing Account (BRRBA) for recovery in customers' rates.

Although BVES is not establishing a new memorandum account, this AL will nonetheless set forth how the proposed modification satisfies the criteria the Commission has determined to be considered when approving new memorandum accounts.⁵

The costs must be incremental and not recoverable in GRC rates. A requirement for the establishment of a memorandum account is that costs booked into the memorandum account must be incremental to costs in rates.⁶ As previously stated, there are no Rule 24 costs in current GRC or other rates. The Commission has stated that where a utility is already incurring costs or expects to soon, and the utility is unable to rely on its GRC to collect costs in rates, a memorandum account is appropriate.⁷ The facts in this AL meet this criteria.

⁵ D.19-09-026.

⁶ D.19-09-026, pp. 5-6, 8.

⁷ D.19-09-026, p. 7.

The expense is substantial and not speculative.

The Commission has stated that if costs are speculative and not substantial in nature, they cannot be recorded in a memorandum account.⁸ The Commission has noted, however, that “[s]imply because there is some uncertainty concerning whether and when the fees will be assessed should not prevent a utility from establishing a memorandum account to record such costs in the event they are incurred.”⁹ Where it is fairly clear that costs will be incurred, but the amount is uncertain, the Commission has found that such costs are not speculative.¹⁰

BVES estimates that the total cost of the three potential Rule 24 projects amounts to approximately \$540,000. This amount is substantial as it represents approximately 5% of BVES’s annual capital budget for 2025. And given the stage of development and the support of the City of Big Bear Lake for the three potential Rule 24 projects, the costs are not speculative. In addition, given the recent surge in interest in Rule 24 projects and the City’s concerns and support, BVES reasonably believes that additional interest and costs in potential Rule 24 projects will occur prior to January 1, 2027. Therefore, this criteria is satisfied.

Recovery of recorded costs is not automatic. The Commission requires that recovery of costs recorded in a memorandum account not be automatic. A reasonableness review is required.¹¹ BVES has stated in this AL that costs recorded in the EVIMA will be reviewed for reasonableness in BVES’s GRC proceedings, and that recovery is not automatic. Therefore, this criteria is satisfied.

Additional factors in support of BVES’s request are as follows:

- Potential customers/applicants have recently expressed some initial interest in pursuing Rule 24 projects. BVES has been approached by the City of Big Bear Lake to support these three potential Rule 24 projects for the benefit of the Big Bear Lake community and BVES’s customers. BVES believes these potential Rule 24 projects could substantially reduce existing congestion around the very limited number of commercial EV charging stations in Big Bear Lake. Given that Rule 24 project are initiated by Rule 24 customer applications and contracts, it is clear that BVES has no control over the timing of Rule 24 projects in its service territory.
- At the time it filed its GRC application in August 2022, BVES was unable to reasonably foresee whether or not there would be any Rule 24 projects during the rate cycle (let

⁸ D.19-09-026, p. 8. See also, D.18-06-029, p. 7

⁹ D.10-12-026, p. 6.

¹⁰ D.19-09-026, pp. 9-10.

¹¹ D.19-09-026, pp. 7-8.

alone how many and at what costs) and, therefore, had no valid basis for requesting any costs in GRC customer rates. In sum, these three potential Rule 24 projects could not have been reasonably foreseen in BVES's last GRC filing.

- The limited number of EV charging stations in BVES's service territory is not sufficient to meet BVES customers' growing demand.¹² Currently, there are only 7 Direct Current Fast Chargers ("DCFC" or "Super Chargers") in the BVES service area. During peak holidays, Big Bear Lake's permanent resident population of approximately 23,000 experiences an increase to above 200,000 people. Big Bear Lake is a destination that experiences high tourism on the weekends. The high number of tourists rely on commercial EV charging stations to charge their EVs. The limited number of Super Chargers is routinely causing congestion problems for the City at the charging station locations. The congestion results in long queuing lines, which causes traffic backups right in the Village area of Big Bear Lake. This traffic is having a negative impact on mobility in the Village area of Big Bear Lake. Additionally, the limited number of charging stations creates a safety risk in cases of natural disasters, such as fires, whereby evacuations could be hindered by a lack of electric vehicle infrastructure available to power vehicles to get customers to safety. The funding of Rule 24 projects will clearly benefit BVES customers.

Tier Designation

This advice letter is submitted with a Tier 2 designation and a requested effective date of the filing of this advice letter.¹³

Notice and Protests

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

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

A protest must state the facts constituting the grounds for the protest, the effect that approval of the advice letter might have on the protestant, and the reasons the protestant believes the

¹² On March 19, 2025, Paul Marconi, BVES President, and Tom Chou, BVES Utility Engineer and Wildfire Mitigation Supervisor, met with Sean Sullivan, Assistant City Manager of Big Bear Lake. At the meeting, Mr. Sullivan indicated there was significant congestion at the limited number of EV chargers in the City and urged BVES to move the three potential Rule 24 projects along as reasonably feasible.

¹³ Commission precedent and statutory authority supports the effective date of this Advice Letter to be the date the Advice Letter was filed. D.20-05-042, p. 10.

advice letter, or a part of it, is not justified. If the protest requests an evidentiary hearing, the protest must state the facts the protestant would present at an evidentiary hearing to support its request for whole or partial denial of the advice letter.

The utility must respond to a protest within five days.

All protests and responses should be sent to:

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

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

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

Correspondence:

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

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

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

Sincerely,

/s/ Ronald Moore

Ronald Moore

Regulatory Affairs Department

Bear Valley Electric Service, Inc.

c: Jenny Au, Energy Division
Michael Campbell, California Public Advocates Office
Scott Logan, California Public Advocates Office
BVES General Order 96-B Service List

PRELIMINARY STATEMENTS

Part VV. Electric Vehicle Infrastructure Memorandum Account (“EVIMA”)

a. Purpose

Pursuant to Assembly Bill (“AB”) 841 (Stats. 2020, Ch. 372), the EVIMA is established to track the BVES-incurred costs of all electrical distribution infrastructure on the utility side of the customer’s meter for all customers installing separately metered infrastructure to support charging stations, other than those in single-family residences. This memorandum account applies to costs incurred by BVES related to electric vehicle infrastructure installed under the provisions of Rule 24 between April 21, 2025 and January 1, 2027, the implementation date of BVES’s 2027-2030 general rate case. Costs that are eligible for recovery as part of the ratemaking approved in BVES’s current Transportation Electrification Programs, such as Charge Ready Transport and Charge Ready 2 Programs, do not apply to this account. (N)

Per AB 841, electrical distribution infrastructure shall include poles, vaults, service drops, transformers, mounting pads, trenching, conduit, wire, cable, meters, other equipment as necessary, and associated engineering and civil construction work.

Pursuant to Ordering Paragraph 5 of Resolution E-5168, the EVIMA will include the cost categories listed in the discussion section of the Resolution. (T)

b. Accounting Procedure

The EVIMA monthly entries should be as follows:

1. A debit entry equal to BVES’s recorded Operations and Maintenance expenses incurred for BVES Electric Rule 24 and compliance with Public Utilities Code Section 740.19(c);
2. A debit entry equal to BVES's recorded incremental capital-related revenue requirement (including depreciation, applicable taxes, and an authorized rate of return on recorded rate base) incurred for BVES Electric Rule 24 and compliance with Public Utilities Code Section 740.19(c);
3. An entry to record interest by applying one-twelfth of the three month Commercial Paper rate (expressed as an annual rate) as reported in the Federal Reserve Statistical Release, H.15, or its successor publication to the EVIMA’s average monthly balance.

c. Disposition

Costs tracked in the EVIMA shall be separately reviewed for reasonableness in BVES’s next general rate case or any other proceeding deemed appropriate by the Commission and, upon approval, transferred to the Distribution subaccount of the Base Revenue Requirement Balancing Account (BRRBA) for recovery in customers’ rates.

Table of Contents

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

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(Continued)

Advice Letter No. 514-E
Decision No. _____

Issued By
Paul Marconi
President

Date Filed April 21, 2025
Effective April 21, 2025
Resolution No. E-5168

BEAR VALLEY ELECTRIC SERVICE, INC.

G.O. 96-B

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