

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 18, 2025

BVES Advice Letter 514-E-A

Jeff Linam
Regulatory Affairs Manager
Bear Valley Electric Service, Inc.
630 E. Foothill Blvd
San Dimas, CA 91773

Subject: Bear Valley Electric Service's Preliminary Statement, Part VV - Electric Vehicle Infrastructure Memorandum Account Update

Dear Mr. Linam:

California Public Utilities Commission's (CPUC, or Commission) Energy Division (ED) approves Bear Valley Electric Service's (BVES) Advice Letter (AL) 514-E-A submitted for approval to modify its Electric Vehicle Infrastructure Memorandum Account ("EVIMA"). This approval is effective as of April 21, 2025.

On April 21, 2025, BVES submitted AL 514-E, requesting to: (1) extend the timeline to record Rule 24 costs to the EVIMA from April 21, 2025, to January 1, 2027, and (2) require EVIMA costs to be reviewed for reasonableness in BVES' future general rate case (GRC). On May 12, 2025, Public Advocates Office ("Cal Advocates") protested AL 514-E. On May 19, 2025, BVES responded to Cal Advocates' protest. On June 27, 2025, BVES supplemented AL 514-E with AL 514-E-A, requesting to: (1) extend the timeline to record Rule 24 costs to the EVIMA from April 21, 2025, to January 1, 2027, (2) require EVIMA costs to be reviewed for reasonableness in BVES' future GRC, and (3) limit cost recovery to the carrying costs and post in-service costs to \$540,900, plus any applicable engineering and legal costs. On July 17, 2025, Cal Advocates protested AL 514-E-A. On July 24, 2025, BVES responded to Cal Advocates' protest.

Attachment 1 contains a detailed discussion of the original and supplemental advice letters, the two protests, BVES' responses, and ED's determination that AL 514-E-A is compliant with PUC § 740.19 and CPUC Resolution E-5168.

Please contact Meschelle Thatcher of Energy Division at Meschelle.Thatcher@cpuc.ca.gov if you have any questions.

Sincerely,

 (for)

Leuwam Tesfai

Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

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PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298**Attachment 1****Review and Analysis****Background**

On September 30, 2020, Governor Newsom signed Assembly Bill (AB) 841, which directed the investor-owned utilities (IOUs) to establish new electric rules for deploying utility-side distribution infrastructure supporting separately-metered electric vehicle (EV) charging stations, excluding charging at single-family residences. On March 1, 2021, Bear Valley Electric Service (BVES) submitted Advice Letter (AL) 413-E, proposing to establish Rule 24 and the Electric Vehicles Infrastructure Memorandum Account (EVIMA) for tracking such costs. On October 7, 2021, the Commission adopted Resolution E-5168, approving AL 413-E with modifications. Pursuant to Public Utilities Code (PUC) § 740.19(c) and Resolution E-5168, the Commission will review the costs recorded in the EVIMA to determine their reasonableness in BVES' next GRC (or other proceeding), and, if approved, would then be transferred to the Base Revenue Requirement Balancing Account (BRRBA) for ratepayer recovery. However, BVES did not receive any Rule 24 applications during the applicable period (January 1, 2021, through BVES' 2023 GRC filing in August 2022). As such, BVES did not request EV charging infrastructure costs in this filing, and no Rule 24 costs are reflected in its current (2023-2026) GRC or other rates.

Advice Letter 514-E

On April 21, 2025, BVES submitted AL 514-E, requesting to modify parameters of its EVIMA by: (1) extending the timeline to record Rule 24 costs to the EVIMA from April 21, 2025, to January 1, 2027, and (2) requiring EVIMA costs to be reviewed for reasonableness before BVES' next GRC cycle begins on January 1, 2027. BVES explains that because the IOU did not receive any Rule 24 applications prior to its GRC filing in August 2022, BVES did not request any Rule 24 costs to be included in its current GRC cycle (2023-2026). However, subsequent to the current EVIMA applicability period, three potential Rule 24 projects—estimated to cost around \$540,000—have been proposed, but have not been formally submitted by the customer as an application for service. BVES argues it is just and reasonable to record the costs incurred by these Rule 24 projects in the EVIMA through January 1, 2027, when the new rates will take effect in BVES' next GRC filing.

Protest to AL 514-E and BVES' Response

On May 12, 2025, Cal Advocates protested AL 514-E, arguing that CPUC should deny AL 514-E due to its material omissions and because the request is neither reasonable nor authorized by statute or Commission order. On May 19, 2025, BVES responded to Cal Advocates' protest. Cal Advocates' arguments and BVES' responses are summarized below, followed by ED's determination.

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**1) Demonstrating the ability to forecast Rule 24 costs in the 2023-2026 GRC filing***Cal Advocates Protest*

Cal Advocates contend that the three potential Rule 24 projects identified by BVES were not unforeseeable. Once BVES established Rule 24, the IOU knew it could receive Rule 24 project proposals. A lack of Rule 24 applications is not enough to demonstrate that BVES could not forecast Rule 24 projects and expenses in its 2023-2026 GRC filing. AL 514-E demonstrates that BVES is capable of estimating the total costs (\$540,000) for the three pending projects without any applications. On March 19, 2021, in a response to AL 413-E, ChargePoint supported the need for EV charging projects, and the City of Big Bear Lake previously “expressed interest” in the utility’s EV charging pilot program.¹ Cal Advocates argue that BVES could have consulted these parties or other potential stakeholders to gauge future interest in Rule 24 projects. Ultimately, Cal Advocates maintain that AL 514-E fails to demonstrate that BVES could not forecast the Rule 24 costs in its 2023-2026 GRC filing, and the EVIMA should have terminated upon BVES’ August 2022 GRC filing, per PUC § 740.19(c).²

BVES Response

BVES asserts that Cal Advocates mistakenly claims that once Resolution E-5168 authorized Rule 24, such costs would no longer be unforeseen. The resolution rendered the *potential* for such costs to be foreseeable. However, BVES insists that they could not predict the *amount* of Rule 24 costs, which thereby remained unforeseen. BVES states they typically rely on historical data to forecast GRC expenses. Citing the lack of customer requests under its EV charging infrastructure pilot as an example, BVES claims they do not have adequate data to justify inclusion of Rule 24 costs in its GRC. According to BVES’ response, not only did the meeting with the City of Big Bear Lake occur after the August 2022 GRC filing, but observing a need for more EV charging stations does not constitute a rigorous forecast of Rule 24 costs. Furthermore, the three potential Rule 24 projects became known after August 2022. BVES reiterates that these are only potential projects for which no Rule 24 applications have been submitted or executed contracts. Even if these projects were proposed during the applicable period for the EVIMA, such expressions of interest alone would not have met the meticulous GRC standards. On the contrary, BVES asserts the project proposals justify the recording of such costs in a memo account with a reasonableness review later on. BVES claims that Cal Advocates conflate meeting memo account standards with meeting GRC standards. This misguided interpretation does not account for the level of rigor required to include costs in GRC rates. Nor does it account for the less stringent standards for establishing a memo account.

ED Disposition

ED agrees with BVES that without reliable data to base their estimates, BVES could not meet the standards of forecasting Rule 24 costs in their 2022 GRC application and agrees with BVES’

¹ Cal Advocates Protest at 6.

² PUC § 740.19(c) authorizes establishing a memo account for the period of January 1, 2021, through the implementation date of rates approved for the next GRC; subsequent recovery shall occur within “periodic general rate case proceedings.”

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reasoning to keep the EVIMA open for their next GRC cycle. ED acknowledges that while it may be similar to BVES' Electric Rule 16, Rule 24 has distinct costs that are not included in Rule 16 and without implementing any Rule 24 projects, BVES could not accurately forecast how these costs will impact their GRC forecast needs. ED considers this issue resolved.

2) Citing Standard Practice U-27-W*Cal Advocates Protest*

Cal Advocates cite Commission Standard Practice U-27-W to support its claim that BVES fails to demonstrate the exceptional and unforeseen nature of the costs associated with the three pending EV infrastructure projects. Cal Advocates assert that, as outlined in Commission Standard Practice U-27-W, the Commission relies on specific criteria when deciding whether to authorize a memo account, including whether the costs: (1) are incurred by exceptional and unforeseen events outside the utility's control, (2) could have been forecasted in the utility's most recent GRC, and (3) will be incurred before the utility's next GRC. Cal Advocates posit that PUC § 740.19(c) provided BVES an opportunity to account for such "unforeseeable events" and record their associated costs to a memo account up until the filing of their 2023-2026 GRC application.³ However, once Rule 24 was authorized by CPUC Resolution E-5168, such costs were no longer unforeseen, which fails to meet the first requirement outlined in U-27-W.

BVES Response

BVES argues that Cal Advocates erroneously cite Commission Standard Practice U-27-W, which only applies to water and sewer utilities, not electric utilities. BVES asserts that citing U-27-W is inappropriate as BVES is an electric utility.

ED Disposition

ED agrees with BVES that Cal Advocates improperly relies upon Commission Standard Practice U-27-W in their protest, which is only applicable to water utilities. We consider this issue resolved.

3) Period of EVIMA applicability*Cal Advocates Protest*

Cal Advocates note that the EVIMA was active for fewer than two years (i.e., January 1, 2021, to August 2022). BVES' request to extend the applicability period to January 1, 2027, would constitute six years of applicability. Cal Advocates assert that BVES does not justify the request for a memo account, especially one that would be open for six years.

BVES Response

Per BVES' response, Cal Advocates erroneously contest that BVES is requesting the memo account to include Rule 24 costs incurred from January 1, 2021, to January 1, 2027 (six years), but BVES

³ Cal Advocates Protest at 5.

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clarifies that their AL is only requesting an extension from April 21, 2025 to January 1, 2027 (20 months).

ED Disposition

ED agrees with BVES' correction on the requested timing of applicability of the EVIMA and considers this issue resolved.

4) Seeking cost recovery in the upcoming 2027 GRC*Cal Advocates Protest*

Cal Advocates' protest argues that as the three potential projects identified by BVES are still in the very early stages of development, and as they do not yet have submitted applications, the costs and timelines remain uncertain. Such costs would likely be incurred toward the end of the current (2023-2026) cycle. Due to this timing, Cal Advocates recommend that BVES should seek recovery in the upcoming 2027 GRC.

BVES Response

According to BVES, Cal Advocates' assertion that BVES has not demonstrated that Rule 24 costs will be incurred during the current GRC cycle is not a valid reason to deny the authorization of a memo account. BVES claims, "attempting to recover in a future GRC cycle costs that were incurred in [a] previous GRC cycle would violate the rule against retroactive ratemaking."⁴ BVES argues that Cal Advocates' proposal thereby constitutes retroactive ratemaking, which violates CPUC policy. BVES elaborates that the proper mechanism for such cost recovery would be to track the costs in a memo account and seek recovery in the next GRC proceeding.

ED Disposition

ED agrees with BVES that demonstrating at which point in the GRC cycle the project costs would be incurred is unnecessary for the utility to obtain Commission authorization of a memo account. ED acknowledges the standard Commission practice of authorizing memo accounts specifically when an activity has not yet been found to be reasonable and necessary and when costs are uncertain. We consider this issue resolved.

5) Reallocating funds from wildfire mitigation work to Rule 24 projects*Cal Advocates Protest*

AL 514-E states, "[n]early 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").⁵ The AL goes on to explain that diverting funds away from WMP projects and toward Rule 24 projects could hinder wildfire mitigation work and incur penalties and fines resulting from BVES' inability to meet WMP obligations. Cal Advocates argue that BVES does

⁴ BVES Response at 8.

⁵ BVES AL 514-E at 3.

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not address why it would need to divert funds from its wildfire work instead of other project funds and recommend that BVES should instead reallocate funds from projects outside the scope of its WMP to Rule 24 projects.

BVES Response

BVES argues that Cal Advocates' recommendation is not in the best interest of ratepayers. BVES claims they have already reallocated some funds from its non-WMP capital budget to its WMP projects, and to reallocate even more of these funds would hamper BVES' ability to "provide safe and reliable service to its customers."⁶

ED Disposition

ED agrees with BVES and considers this issue resolved.

6) EVIMA cap at \$750,000*Cal Advocates Protest*

Cal Advocates did not make any comments in their protest regarding the inclusion of a cap on the memo account.

BVES Response

To "assuage any concerns" about its request, BVES proposes capping its EVIMA at \$750,000.⁷ BVES explains that the amount would cover the costs forecasted for the three pending projects (i.e., \$540,000) as well as other potential Rule 24 projects that may arise before January 1, 2027.

ED Disposition

BVES submitted AL 514-E-A, which modified this request. Therefore, the issue is now moot.

Supplemental Advice Letter 514-E-A

On June 27, 2025, BVES submitted AL 514-E-A. Although AL 514-E-A replaces AL 514-E in its entirety, the supplemental AL largely retains the substance of the original AL, including the requests to extend the timeframe of the EVIMA applicability and ensure the costs will be reviewed for reasonableness in a future GRC. AL 514-E-A includes an additional request to cap the EVIMA at \$540,900, which is notably less than what was originally proposed in BVES' response to Cal Advocates' protest (\$750,000). The cap would include carrying costs and post in-service costs, as well as any applicable engineering and legal costs associated with the three Rule 24 projects recently proposed.

⁶ BVES Response at 9.

⁷ BVES Response at 9.

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**Protest to AL 514-E-A and BVES' Response**

On July 17, 2025, Cal Advocates protested AL 514-E-A, again arguing that CPUC should deny AL 514-E-A due to its material omissions and because the request is neither reasonable nor authorized by statute or Commission order. The protest reiterates much of the same arguments presented in the original protest to AL 514-E, including the issues disposed above (i.e., demonstrating the ability to forecast Rule 24 costs in the 2023-2026 GRC filing, citing Standard Practice U-27-W, the period of EVIMA applicability, seeking cost recovery in the upcoming 2027 GRC, reallocating funds from wildfire mitigation work to Rule 24 projects, and setting the EVIMA cap at \$750,000). On July 24, 2025, BVES responded to Cal Advocates' protest. Cal Advocates' arguments and BVES' responses are summarized below, followed by ED's determination.

1) Authority for EVIMA extension*Cal Advocates Protest*

Cal Advocates states that even though PUC § 740.19(c) authorizes BVES to initially track Rule 24 costs in a memo account from January 1, 2021, through the IOU's next GRC decision, the statute requires such cost recovery through the GRC process thereafter. Cal Advocates assert that based on PUC § 740.19(c) and Resolution E-5168, BVES does not have the authority to extend the applicability period of their EVIMA. According to Cal Advocates, Resolution E-5168 guaranteed the EVIMA "would terminate upon its next GRC filing, i.e. BVES' 2023-2026 GRC filing," citing pages 2, 4, and 29 of the Resolution.⁸ The protest goes on to explain that the Commission does not favor the use of memo accounts for ratepayer cost recovery as these types of accounts bypass the more rigorous magnitude of transparency and scrutiny required in the GRC process.

BVES Response

BVES argues that Cal Advocates' claim is unfounded. BVES points to *Southern California Edison vs. Peevey* (2003, 31 Cal4th 781, 74 P.3d 795), which affirms the CPUC's "far-reaching" authority to set rates that is only limited by statutory constraints.⁹ Additionally, BVES states that PUC § 740.19(c) does not explicitly prohibit any extension or creation of a new memo account so long as "recovery of such costs occurs in a subsequent periodic general rate case proceeding."¹⁰ BVES argues that it is common CPUC practice to recover past costs that were tracked in a memo account in a GRC proceeding. They assert that denying the requests outlined in AL 514-E-A would impede BVES' ability to recover the Rule 24 project costs incurred during the applicable timeframe, which does not reflect the Legislature's intent outlined in AB 841 and PUC § 740.19.

ED Disposition

ED finds no such language to support the claim that the Commission guaranteed the termination of the EVIMA upon BVES' next GRC filing on pages 2, 4, or 29 of Resolution E-5168. ED agrees with BVES and considers this issue resolved.

⁸ Cal Advocates Supplemental Protest at 4.

⁹ BVES Response to Cal Advocates' Supplemental Protest at 3-4.

¹⁰ BVES Response to Cal Advocates' Supplemental Protest at 4.

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2) Nature and quantity of the projected costs

Cal Advocates Protest

In their protest, Cal Advocates assert that BVES has not elaborated on the nature or probable quantity of the \$540,900 projected costs that BVES proposes. Specifically, they state that AL 514-E-A omits any description of the cost categories as well as the total costs for each category for these proposed projects. Moreover, Cal Advocates argue that BVES does not address how the costs requested in AL 514-E differ from the costs requested in AL 514-E-A. Lastly, they claim it's unclear how BVES assigns costs for these projects as AL 514-E-A estimates the same total project costs as AL 514-E (\$540,900), but AL 514-E-A mentions the addition of engineering and legal costs when AL 514-E did not.¹¹

BVES Response

BVES states that the \$540,900 cap reflects the total forecasted costs associated with the three Rule 24 project proposals that have not yet been submitted by customers. However, BVES clarifies that only the carrying costs (i.e., not the total capital costs) would be recorded in the EVIMA and would be approximately \$75,000 per year. As such, there is no reason to believe the total costs recorded over the 20-month period would be more than \$540,900.

BVES does not specify the specific cost categories for the proposed Rule 24 projects in the advice letter. However, in its response to Cal Advocates' protest, BVES clarifies what is included in the "carrying costs" that would be tracked in the EVIMA:

The language in subparagraph "a – Purpose" of the proposed Preliminary Statement attached to the Advice Letter states that "Costs tracked in the EVIMA shall be limited to the carrying costs and any post in-service costs, from April 21, 2025 through January 1, 2027 on approved Rule 24 projects . . ." Those carrying costs and post in-service costs are "not to exceed \$540,900, plus any applicable engineering and legal costs."

The cost categories of the carrying costs are described in subparagraph "b – Accounting Procedures" and described as the "incremental capital related revenue requirement" including "income taxes, ad valorem tax, depreciation, other applicable taxes and fees, and an authorized rate of return on recorded rate base."¹²

ED Disposition

ED understands that the three potential Rule 24 projects have only been proposed via informal discussions between BVES and its customers. ED notes that BVES is required to comply with the data collection and EVIMA recording requirements ordered by Resolution E-5168, which requires the granular level of costs that Cal Advocates' suggest be included in the advice letter. Thus, if applications are submitted by the customer and processed by BVES for the three potential projects

¹¹ ED notes that AL 514-E estimated \$540,000 total, which is \$900 less than what is estimated in AL 514-E-A.

¹² BVES Response to Cal Advocates' Supplemental Protest at 15.

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in question, the information requested by Cal Advocates will be available to stakeholders for their review in the EV Rule data collection submission and BVES' EVIMA.

Conclusion

ED has reviewed BVES AL 514-E and AL 514-E-A. As BVES has not received any Rule 24 applications we agree that BVES could not reasonably forecast the expected Rule 24 costs in its GRC filing in August 2022. We find the request to authorize the extension of the EVIMA and the \$540,900 cap to be compliant with PUC § 740.19 and Resolution E-5168 and the requests are hereby approved.



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-EA

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
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505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

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Title: Regulatory Affairs Manager
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Clear Form



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

June 27, 2025

Advice Letter No. 514-EA

(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 for a limited duration 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. The EVIMA remains an open account on BVES's Preliminary Statements.

Supplement

BVES is supplementing Advice Letter No. 514-E to provide additional detail regarding its request. To address any concern regarding the magnitude of the costs BVES is seeking through this advice letter, in addition to limiting the extension of the EVIMA to the originally requested 20-month period, BVES also seeks a limitation on the use of the

¹ AB 841 provides for cost recovery in GRC proceedings.

EVIMA to tracking the carrying costs on three Rule 24 projects, plus any applicable engineering and legal costs. These three Rule 24 projects are forecasted to total \$540,900 and include:

- Village Pizza – Tesla: \$96,500
- Vons – Tesla: \$241,300
- Grocery Outlet – Renewable Energy Partners: \$203,100

BVES requests to modify its Preliminary Statement (Part VV) for the EVIMA to include the following language:

Costs tracked in the EVIMA shall be limited to the carrying costs and any post-in service costs, from April 21, 2025 through January 1, 2027, on approved Rule 24 projects not to exceed \$540,900, plus any applicable engineering and legal costs. Any costs tracked in the EVIMA will 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.

This filing will replace Advice Letter No. 514-E in its entirety.

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 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 \$540,900, 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 \$540,900 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.

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.

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 three narrow, simple modifications to BVES’s EVIMA discussed below.

Even if the three 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

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 EVIMA to be modified to authorize carrying costs and any post in-service costs applicable to the three Rule 24 projects at a total cost of \$540,900, plus any applicable engineering and legal costs, 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, (2) require costs booked into the EVIMA to be reviewed for reasonableness in BVES’s GRCs, and (3) limit recovery to the carrying costs and any post in-service costs to the three Rule 24 Projects up to a total forecasted cost of \$540,900, plus any applicable engineering and legal costs. To be clear, BVES understands and agrees that recovery of such EVIMA costs will not be automatic. In addition, future Rule

³ D.19-09-026, p. 6.

⁴ Id., pp. 6-7

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 limited to the carrying costs and any post-in service costs, from April 21, 2025 through January 1, 2027, on approved Rule 24 projects not to exceed \$540,900, plus any applicable engineering and legal costs. Any costs tracked in the EVIMA will 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.

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.

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

⁵ D.19-09-026.

⁶ D.19-09-026, pp. 5-6, 8.

⁷ D.19-09-026, p. 7.

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

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 \$540,900. 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 projects 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 alone how many and at what costs) and, therefore, had no valid basis for requesting any Rule 24 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.

⁹ D.10-12-026, p. 6.

¹⁰ D.19-09-026, pp. 9-10.

¹¹ D.19-09-026, pp. 7-8.

- 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 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.

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.

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
Tamera Godfrey, 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)

(N)

Costs tracked in the EVIMA shall be limited to the carrying costs and any post-in service costs, from April 21, 2025 through January 1, 2027, on approved Rule 24 projects not to exceed \$540,900, plus any applicable engineering and legal costs. Any costs tracked in the EVIMA will 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.

(N)

(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.

b. Accounting Procedure

The EVIMA monthly entries should be as follows:

1. A debit entry equal to BVES’s recorded Operations and Maintenance, engineering and legal 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 at GSWC’s authorized rate of return and related expenses (including income taxes, ad valorem tax, depreciation, other applicable taxes and fees, 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.

(T)

(T)

|

(T)

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-EA
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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