California Public Utilities Commission

# ADVICE LETTER SUMMARY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)						
Company name/CPUC Utility No.: Bear Valley Electric Service (913-E)						
Utility type: ELC GAS WATER PLC HEAT	Contact Person: Nguyen Quan Phone #: (909) 394-3600 x664 E-mail: nguan@gswater.com E-mail Disposition Notice to: nguan@gswater.com					
EXPLANATION OF UTILITY TYPE ELC = Electric GAS = Gas WATER = Water PLC = Pipeline HEAT = Heat WATER = Water	(Date Submitted / Received Stamp by CPUC)					
Advice Letter (AL) #: 364-E	Tier Designation: 1					
Subject of AL: Establish the Wildfire Mitigation Plan Implementation Memorandum Account in Accordance with Commission Decision No. 19-05-040						
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 #: Decision No. 19-05-040						
Does AL replace a withdrawn or rejected AL?	If so, identify the prior AL: $_{ m No}$					
Summarize differences between the AL and th	e prior withdrawn or rejected AL: $\mathrm{N/A}$					
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: 5/31/19 No. of tariff sheets: 2						
Estimated system annual revenue effect (%): 0.0						
Estimated system average rate effect (%): 0.0						
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, Table of Contents P.1						
Service affected and changes proposed $^{1:}$ See	Advice Letter					
Pending advice letters that revise the same tariff sheets: $_{ m None}$						

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

CPUC, Energy Division Attention: Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102 Email: <u>EDTariffUnit@cpuc.ca.gov</u>	Name: Nguyen Quan Title: Regulatory Affairs Manager Utility Name: Bear Valley Electric Service Address: 630 E. Foothill Blvd. City: San Dimas Telephone (xxx) xxx-xxxx: (909) 394-3600 x 664 Facsimile (xxx) xxx-xxxx: (909) 394-7427 Email: nquan@gswater.com	
	Name: Ronald Moore Title: Senior Regulatory Analyst Utility Name: Bear Valley Electric Service Address: 630 E. Foothill Blvd. City: San Dimas State: California Telephone (xxx) xxx-xxxx: (909) 394-3600 x 682 Facsimile (xxx) xxx-xxxx: (909) 394-7427 Email: rkmoore@gswater.com	



June 6, 2019

Advice Letter No. 364-E

(U 913 E)

# **California Public Utilities Commission**

Golden State Water Company ("GSWC") hereby transmits one original and two conformed copies of the following tariff sheets applicable to its Bear Valley Electric Service ("BVES") operations:

<u>CPUC Sheet No.</u> Original No. 2662–E	<u>Title of Sheet</u> Preliminary Statements Part RR	<u>CPUC Sheet No.</u>	
Revised No. 2663–E	Table of Contents	Revised No. 2661-E	

# SUBJECT: Wildfire Mitigation Plan Implementation Memorandum Account

Page 1 of 3

# **PURPOSE**

In accordance with the California Public Utilities Commission's Decision No. ("D.") 19-05-040 Golden State Water Company ("GSWC"), doing business as Bear Valley Electric Service ("BVES") hereby submits its Advice Letter 364-E to establish the Wildfire Mitigation Plan Implementation Memorandum Account ("WMPIMA"), effective May 31, 2019, the day immediately following the issuance date of the D.19-05-040, which authorized the establishment of the WMPIMA and approving Bear Valley Electric Service's wildfire mitigation plan.

# BACKGROUND

On September 21, 2018, the Governor of the State of California signed into law SB 901. Among other things, SB 901 establishes measures to help combat wildfires in the state of California. SB 901 outlines the requirements of the Wildfire Mitigation Plans to be submitted by California electric corporations to the Commission.

SB 901 also authorizes electric corporations to establish two memorandum accounts to record costs incurred to mitigate wildfire risk. The first authorized memorandum account, the FRMMA, tracks costs incurred for fire risk mitigation that are not otherwise covered in BVES's revenue requirement.<sup>1</sup> On November 6, 2018, GSWC filed Advice Letter No. 352-E, to establish the Fire Risk Mitigation Memorandum Account. Advice Letter 352-E was approved with an effective date of January 1, 2019.

<sup>&</sup>lt;sup>1</sup> See PU Code Section 8386(j) (effective January 1, 2019).

# Advice Letter 364-E

GSWC is filing Advice Letter No. 364-E in compliance with D. 19-05-040 to establish the second memorandum account ordered on SB 901. The purpose of the WMPIMA will be to track costs incurred to implement the plan. The WMPIMA is approved and activated, GSWC would stop recording costs for work approved in its Wildfire Mitigation Plan to the FRMMA and, instead, would record any costs not included in rates to the WMPIMA. The FRMMA would remain open to record costs of any additional wildfire mitigation activities not included in the approved Wildfire Mitigation Plan.

# WMPIMA AND ELIGIBILITY

The purpose of the WMPIMA is to track the implementation costs incurred for the Commission-approved fire risk mitigation plan that are not otherwise in BVES's revenue requirement. These costs shall include, but are not limited to, expenses and capital expenditures for increased inspections and patrols; system hardening and infrastructure modernizing, such as fuse upgrades, replacement of line with covered conductors; expanded monitoring automation and system protection such as Supervisory and Data Acquisition (SCADA); improved situational awareness and wildfire detection such as installation of weather stations; enhanced capacity to respond to events and incidents, including animal incidents; and vegetation management activities.

# **COMPLIANCE**

Ordering Paragraph No. 21 in D.19-05-040 authorizes GSWC to establish the WMPIMA.

# MEMORANDUM ACCOUNT TREATMENT

GSWC is aware that a memorandum account is not a guarantee of eventual recovery of expenses, nor is it carried as a regular account under the uniform system of accounts for water utilities. It is carried "off the books", as a memorandum account. Further, it is also known that Commission policy on memorandum account treatment has always been that the burden of proof of the reasonableness of expenses charged to the account is the responsibility of the utility requesting reimbursement of such expenses.

# **REVISIONS TO PRELIMINARY STATEMENT**

Pursuant D.19-05-040, GSWC proposes to revise its Preliminary Statements to include Part RR, Wildfire Mitigation Plan Implementation Memorandum Account.

# TIER DESIGNATION AND EFFECTIVE DATE

This advice letter is submitted with a Tier 1 designation and shall be effective on May 31, 2019.

No individuals or utilities have requested notification of filing of tariffs. Distribution of this Advice Letter is being made to the attached service list in accordance with General Order No. 96-B. This advice letter will also be served on the service list for R.18-10-007.

# 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

Advice Letter 364-E

sought, but nevertheless presents information that the party tendering the response believes would be useful to the CPUC in acting on the request.

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

A protest must state the facts constituting the grounds for the protest, the effect that approval of the advice letter might have on the protestant, and the reasons the protestant believes the advice letter, or a part of it, is not justified. If the protest requests an evidentiary hearing, the protest must state the facts the protestant would present at an evidentiary hearing to support its request for whole or partial denial of the advice letter. The utility must respond to a protest with five days.

# All protests and responses should be sent to:

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

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

Copies of any such protests should be sent to this utility at: Golden State Water Company ATTN: Nguyen Quan 630 East Foothill Blvd. San Dimas, CA 91773 Fax: 909-394-7427 E-mail: nquan@gswater.com

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

## CORRESPONDENCE

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

Nguyen Quan Manager, Regulatory Affairs Golden State Water Company 630 East Foothill Blvd. San Dimas, California 91773 Email: nquan@gswater.com Advice Letter 364-E

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,

<u>/s/Nguyen Quan</u> Nguyen Quan Manager, Regulatory Affairs

c: Edward Randolph, Director, CPUC – Energy Division Franz Cheng, Energy Division R. Mark Pocta, Cal PA BVES General Order 96-B Service List R.18-10-007 Service List

#### Preliminary Statements Wildfire Mitigation Plan Implementation Memorandum Account

#### RR. Wildfire Mitigation Plan Implementation Memorandum Account

This Wildfire Mitigation Plan Implementation Memorandum Account ("WMPIMA") is established in accordance with Section 38 of California Senate Bill 901, which was signed into law by the Governor of the State of California on September 21, 2018, amending Section 8386(j) of the California Public Utilities Code, requiring Bear Valley Electric Service ("BVES") to establish a memorandum account to track the implementation costs incurred for the California Public Utilities Commission-approved fire risk mitigation plan that are not otherwise in BVES's revenue requirement. Golden State Water Company ("GSWC") shall maintain the WMPIMA for its BVES division. The California Public Utilities Commission's Decision No. 19-05-040, dated May 30, 2019, authorized the establishment of the WMPIMA.

#### 1. **PURPOSE**

The purpose of the WMPIMA is to track costs incurred implementing the Commission-approved Fire Risk Mitigation Plan that are not otherwise covered in BVES's revenue requirement.

These costs shall include, but are not limited to expenses and capital expenditures for: Increased inspections and patrols; system hardening and infrastructure modernizing, such as fuse upgrades, replacement of line with covered conductors; expanded monitoring automation and system protection such as Supervisory and Data Acquisition (SCADA); improved situational awareness and wildfire detection, such as installation of weather stations; enhanced capacity to respond to events and incidents, including animal incidents; and vegetation management activities.

#### 2. APPLICABILITY

The WMPIMA applies to all customer classes and rate schedules, except for those specifically excluded by the Commission.

#### 3. <u>**RATES**</u>

The WMPIMA does not have a rate component.

#### 4. ACCOUNTING PROCEDURES

GSWC shall maintain the WMPIMA by making entries at the end of each month as follows:

- a. A debit entry shall be made to the WMPIMA at the end of each month to record the fire risk mitigation implementation costs.
- b. Interest shall accrue to the WMPIMA on a monthly basis by applying a rate equal to one-twelfth of the 3-month Commercial Paper Rate, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of-month and the end-of-month balances.

#### 5. EFFECTIVE DATE

The WMPIMA shall be effective on May 31, 2019.

#### 6. DISPOSITION

Disposition of amounts recorded in the WMPIMA shall be determined in a subsequent general rate case or other rate setting filing authorized by the Commission.

(N)

(N)

Advice Letter No. <u>364-E</u> Decision No. <u>19-05-040</u> Issued By **R. J. Sprowls President** 

Date Filed June 7, 2019 Effective May 31, 2019 Resolution No.

#### GOLDEN STATE WATER COMPANY (U 913 E)

630 E. FOOTHILL BLVD. – P.O. BOX 9016 SAN DIMAS, CALIFORNIA 91773-9016

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#### Table of Contents

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(Continued)

Advice Letter No. <u>364-E</u> Decision No. <u>19-05-040</u> Issued By **R. J. Sprowls President** 

Date Filed June 7, 2019 Effective May 31, 2019 Resolution No.

#### **GOLDEN STATE WATER COMPANY**

### <u>G.O. 96-B</u> SERVICE LIST

# **BEAR VALLEY ELECTRIC SERVICE DIVISION**

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