

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



**Bear Valley Electric Service, Inc.
ELC (Corp ID913)
Status of Advice Letter 398E
As of August 25, 2020**

Subject: California Consumer Privacy Act Memorandum Account

Division Assigned: Energy

Date Filed: 07-27-2020

Date to Calendar: 07-29-2020

Authorizing Documents: D2005042

Disposition:	Accepted
Effective Date:	01-07-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Nguyen Quan

909-394-3600 X664

nquan@gswater.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

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

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Nguyen Quan

Phone #: (909) 394-3600 x664

E-mail: nquan@gswater.com

E-mail Disposition Notice to: nquan@gswater.com, zeng.zhu@bvcs

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 398-E

Tier Designation: 1

Subject of AL: California Consumer Privacy Act Memorandum Account

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

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision No. 20-05-042

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

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

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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

Resolution required? Yes No

Requested effective date: 1/7/20

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 UU, Table of Content

Service affected and changes proposed¹: see Advice Letter

Pending advice letters that revise the same tariff sheets:

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: Nguyen Quan
Title: Regulatory Affairs Manager
Utility Name: Bear Valley Electric Service, Inc
Address: 630 E. Foothill Blvd
City: San Dimas State: California
Telephone (xxx) xxx-xxxx: (909) 394-3600 x664
Facsimile (xxx) xxx-xxxx: (909) 394-7427
Email: nquan@gswater.com

Name: Zeng Zhu
Title: Rate Analyst
Utility Name: Bear Valley Electric Service, Inc
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Bear Valley Electric Service, Inc.
P.O. Box 9028
San Dimas, CA 91773-9028
A Subsidiary of American States Water Company

July 27, 2020

Advice Letter No. 398-E

(U 913 E)

California Public Utilities Commission

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

SUBJECT: California Consumer Privacy Act Memorandum Account.

PURPOSE

Pursuant to Decision No. ("D.") 20-05-042, Ordering Paragraph No. ("OP") 1, this advice letter ("AL") seeks authorization from the California Public Utilities Commission ("Commission" or "CPUC") to establish a California Consumer Privacy Act Memorandum Account ("CCPAMA"). The purpose of the CCPAMA is to track incremental expenses, that are not otherwise covered in BVES's revenue requirement, to comply with consumer privacy laws and regulations required in Assembly Bill ("AB") 375, the California Consumer Privacy Act of 2018.

This advice letter is in compliance with OP 1 of D.20-05-042.

BACKGROUND

On June 28, 2018, Jerry Brown, then Governor of the State of California, signed Assembly Bill 375 in to law. Assembly Bill 375, now known as the California Consumer Privacy Act of 2018 ("CCPA"), grants consumers new rights with respect to the collection of their personal information.

The CCPA grants consumers broad rights to access and manage their personal information including:

- To know what personal information is being collected about them;
- To know whether and to whom the personal information is sold/disclosed, and to opt-out of its sale;
- To access their personal information;
- To have a business delete their personal information; and
- To not be discriminated against for exercising their rights under the CCPA.

The CCPA went into effect on January 1, 2020, and broadly applies several criteria to determine if an organization would be subjected to compliance. BVES is subject to the CCPA since its gross annual revenues exceeds \$25 million.

On January 7, 2020, BVES filed Application No. ("A.") 20-01-001 with the Commission. This application seeks authority from the Commission to establish a memorandum account to track incremental costs related to compliance with the CCPA during 2020 and 2021. In the application, BVES states that compliance with CCPA will "necessitate significant and potentially costly upgrades of customer data, IT and privacy systems, procedures, standards, compliance requirements, and training" and, therefore, expects to incur costs to comply with the new law. BVES will seek recovery of costs recorded in the memorandum account in BVES's subsequent General Rate Case ("GRC") application.

On June 5, 2020, the Commission issued D.20-05-042, granting BVES's request for a memorandum account to record and track incremental capital costs and expenses related to implementing the CCPA.

CALIFORNIA CONSUMER PRIVACY ACT MEMORANDUM ACCOUNT

The requirements for complying with the CCPA will require BVES to update its business policies, processes and systems including, but not limited to, the following:

- Update its website, as required by the law that address consumer's right to know;
- Develop a change management plan including training, aimed at ensuring employees are aware of and understand the CCPA requirements and their specific responsibilities;
- Develop internal consumer privacy policies to ensure continued compliance;
- Evaluate, select and purchase technology to identify, inventory, and provide information and data from BVES's repository of electronic customer personal information to customers, if requested, as required by the CCPA;
- Develop, test, and execute processes and procedures to deliver information to customers in response to customer requests, as required by the CCPA;
- Develop, test and execute processes; purchase technology to delete, de-identify, or anonymize customer personal information in response to requests, as required by the CCPA (i.e. in the case of former customers or other third parties who live in California);
- Develop internal policies and procedures to document, audit and confirm CCPA compliance.

BVES's CCPAMA will track incremental costs only, i.e. costs not otherwise covered in BVES's authorized revenue requirement. BVES will seek disposition of this account in its next GRC. This provides the Commission opportunity to review the account.

BVES 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 utilities. It is carried "off the books" as a memorandum account. Further, it is also

known that the Commission's policy on memorandum account treatment has always been that the burden of proof of the reasonableness of costs charged to the account is the responsibility of the utility requesting reimbursement of such costs.

COMPLIANCE

This advice letter is in compliance with the OP 1 in D.20-05-042.

TIER DESIGNATION

This advice letter is submitted with a Tier 1 designation.

EFFECTIVE DATE

BVES respectfully requests this advice letter become effective on January 7, 2020.

NOTICE AND PROTESTS

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

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

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

The utility must respond to a protest within five days.

All protests and responses should be sent to:

California Public Utilities Commission, Energy Division

ATTN: Tariff Unit

505 Van Ness Avenue

San Francisco, CA 94102

E-mail: EDTariffUnit@cpuc.ca.gov

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

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

Bear Valley Electric Service, Inc.

ATTN: Nguyen Quan

630 East Foothill Blvd.
San Dimas, CA 91773
Fax: 909-394-7427
E-mail: 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 e-mail to the attention of:

Nguyen Quan
Manager, Regulatory Affairs
Bear Valley Electric Service, Inc.
630 East Foothill Blvd.
San Dimas, California 91773
Email: nquan@gswater.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/Zeng Zhu
Zeng Zhu
Rate Analyst, Regulatory Affairs

cc: Edward Randolph, Director, Energy Division
Franz Cheng, Energy Division
R. Mark Pocta, California Public Advocates Office
BVES General Order 96-B Service List

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
2863-E	PRELIMINARY STATEMENTS Sheet 1	
2864-E	Table of Contents Sheet 1	2862-E*

PRELIMINARY STATEMENTS

UU. CALIFORNIA CONSUMER PRIVACY ACT MEMORANDUM ACCOUNT ("CCPAMA") (N)

1. PURPOSE (N)

The purpose of the California Consumer Privacy Act Memorandum Account ("CCPAMA") is to track the incremental (not included in its General Rate Case) capital costs and expenses to implement the California Consumer Privacy Act of 2018. These costs may include initial implementation and ongoing maintenance costs, and other related expenses to comply with the requirements of the California Consumer Privacy Act of 2018 during 2020 and 2021.

2. RATE

The CCPAMA does not have a rate component.

3. ACCOUNTING PROCEDURE

Bear Valley Electric Service, Inc. ("BVES") shall maintain the CCPAMA by making entries as follows:

- a. All initial implementation capital costs and expenses associated with complying with the California Consumer Privacy Act of 2018;
- b. All ongoing maintenance costs and other expenses associated with compliance with the California Consumer Privacy Act of 2018;
- c. An accounting entry shall be made to the CCPAMA at the end of each month to record costs and expenses;
- d. Interest shall accrue to the CCPAMA on a monthly basis by applying a rate equal to one-twelfth of the 3-month non-financial Commercial Paper H-15, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of-month and the end-of-month balances.

4. MEMORANDUM ACCOUNT PERIOD

The CCPAMA will remain in effect from the effective date until new rates incorporating the requirements for the California Consumer Privacy Act of 2018 are placed into effect under BVES's next General Rate Case decision.

5. DISPOSITION

Disposition and recovery of amounts recorded in the CCPAMA shall be determined in BVES's next General Rate Case application.

(N)

Table of Contents

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

<u>Subject Matter of Sheet</u>	<u>Sheet No.</u>	
Title Page	2845-E	
Table of Contents	2864-E, 2829-E, 2843-E	(T)
Preliminary Statements	935-E, 1590-E*, 1591-E*, 2381-E*, 2382-E*, 1594-E*, 1595-E*, 1596-E*, 1597-E*, 2176-E, 2177-E, 2751-E, 2179-E, 2180-E, 2602-E, 2603-E*, 1604-E*, 1605-E*, 1606-E*, 1611-E*, 1650-E, 2201-E, 2715-E, 2716-E, 2717-E, 1928-E, 1929-E, 1946-W, 2028-E, 2032-E, 2034-E, 2817-E, 2818-E, 2483-E, 2484-E, 2485-E, 2486-E, 2487-E, 2174-E, 2175-E, 2443-E, 2444-E, 2463-E, 2554-E, 2565-E, 2768-E, 2612-E, 2633-E, 2651-E, 2653-E, 2662-E, 2718-E, 2800-E, 2863-E	(P) (N)
Tariff Area Map	1140-E	
Rate Schedules:		
No. A-1 General Service	2847-E*, 1836-E	(P)
No. A-2 General Service	2848-E*, 1838-E	(P)
No. A-3 General Service	2849-E*, 1840-E	(P)
No. A-4 General Service- TOU	2850-E*, 1842-E, 1843-E	(P)
No. A-5 TOU Primary	2851-E*, 1845-E, 1846-E	(P)
No. A-5 TOU Secondary	2852-E*, 1848-E, 1849-E	(P)
No. D Domestic Service - Single-family Accommodation	2853-E*, 1851-E, 1852-E	(P)
No. DE Domestic Service to Company Employees	2854-E*, 1854-E	(P)
No. DLI Domestic Service - CARE Rate	2855-E*, 2795-E, 1857-E, 1858-E	(P)
No. DM Domestic Service - Multi-family Accommodation	2856-E*, 1860-E, 1861-E	(P)
No. DMS Domestic Service -Multi-family Accommodation Sub-metered	2812-E, 2857-E*, 1864-E	(P)
No. DO Domestic Service – Other	2858-E*, 1866-E	(P)
No. NEM-L Net Energy Metering- Large	1931-E, 1932-W, 1933-E, 1934-E, 1935-E	
No. NEM-S Net Energy Metering- Small	1936-E, 1937-E, 1938-E, 1939-E, 1940-E	
No. GSD General Service Demand – Camp Oaks	2859-E*, 1868-E	(P)
No. SL Street Lighting Service	2860-E*, 2709-E	(P)
No. SSC Special Service Charges	2710-E, 2711-E	
No. S Standby Standby Service	2831-E, 2160-E, 2161-E	
No. SMO Smart Meter Opt-Out Residential Service	2445-E	
No. PPC-LI Public Purpose Charge - Low Income	2749-E	
No. PPC-OLI Public Purpose Charge - Other Than Low Income	2750-E	
No. UF-E Surcharge to Fund PUC Utilities Reimbursement Account Fee	2861-E*	(P)
No. TOU-EV-1 General Service Time of Use Electric Vehicle Charging	2605-E, 2606-E	
No. TOU-EV-2 General Service Time of Use Electric Vehicle Charging	2607-E, 2608-E	
No. TOU-EV-3 General Service Time of Use Electric Vehicle Charging	2609-E, 2610-E	
No. DGS Distributed Generation Service Program	2788-E, 2789-E, 2790-E	
No. DGS NEM-L Distributed Generation Service Net Energy Metering-Large	2833-E, 2834-E, 2835-E	
No. DGS NEM-L Distributed Generation Service Net Energy Metering-Small	2836-E, 2837-E, 2838-E	
Contracts and Deviations	888-E	
Rules:		
No. 1 - Definitions	1114-E, 1115-E, 1116-E, 1117-E, 1118-E, 1119-E, 1120-E, 1121-E, 1122-E, 1123-E, 1124-E, 1125-E, 1126-E, 1127-E, 1877-E, 1129-E, 1130-E	
No. 2 - Description of Service	594-E, 595-E, 596-E, 597-E, 598-E, 599-E, 600-E, 601-E, 602-E, 603-E	
No. 3 - Application for Service	950-E, 951-E	
No. 4 - Contracts	604-E	
No. 5 - Special Information Required on Forms	2556-E, 2557-E, 2558-E	
No. 6 - Establishment and Re-establishment of Credit	608-E, 1878-E	
No. 7 - Deposits	2162-E	
No. 8 - Notices	611-E	
No. 9 - Rendering and Payment of Bills	2163-E	
No. 10 - Disputed Bills	2559-E, 2560-E	
No. 11 - Discontinuance and Restoration of Service	580-E, 581-E, 582-E, 1002-E, 2511-E, 2512-E, 2513-E	
No. 12 - Rates and Optional Rates	612-E, 613-E	
No. 13 - Temporary Service	614-E, 615-E	
No. 14 - Shortage of Supply and Interruption of Delivery	616-E	
No. 15 - Distribution Line Extensions	2103-E, 2104-E, 2105-E, 2106-E, 2107-E, 2108-E, 2109-E, 2110-E, 2111-E, 2112-E, 2113-E, 2114-E, 2115-E, 2116-E	

(Continued)

Advice Letter No. 398-E
 Decision No. 20-05-042

Issued By
Paul Marconi
President

Date Filed July 27, 2020
 Effective January 7, 2020
 Resolution No. _____

BEAR VALLEY ELECTRIC SERVICE, INC.

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