



## California Public Utilities Commission

# ADVICE LETTER



ENERGIUILIII	OF CALL
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	Contact Person: Jeff Linam Phone #: (909) 394-3600 x664 E-mail: RegulatorvAffairs@bvesinc.com E-mail Disposition Notice to: RegulatorvAffairs@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) #: 481-E	Tier Designation: 1
Subject of AL: Vegetation Management Revenue Requirements Pursuant to PUC sec. 8386.3(d)  Keywords (choose from CPUC listing): Compliance	
AL Type: Monthly Quarterly Annual One-Time Other:	
If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: PUC sec. 8386.3(d)	
Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: $_{ m No}$	
Summarize differences between the AL and the prior withdrawn or rejected AL:	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: $1/8/23$	No. of tariff sheets:
Estimated system annual revenue effect (%):	
Estimated system average rate effect (%):	
When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).	
Tariff schedules affected:	
Service affected and changes proposed <sup>1:</sup> see Advice Letter	
Pending advice letters that revise the same tariff sheets:	

### 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: Jeff Linam

Title: Regulatory Affairs Manager

Utility Name: Bear Valley Electric Service, Inc

Address: 630 E. Foothill Blvd

City: San Dimas State: California

Telephone (xxx) xxx-xxxx: (909) 394-3600 x664

Facsimile (xxx) xxx-xxxx:

Email: RegulatoryAffairs@bvesinc.com; jeff.linam@gswater.com

Name: Alicia Menchaca

Title: Rate Analyst, Regulatory Affairs

Utility Name: Bear Valley Electric Service, Inc

Address: 630 E. Foothill Blvd

City: San Dimas State: California

Telephone (xxx) xxx-xxxx: (909) 630-5555

Facsimile (xxx) xxx-xxxx:

Email: alicia.menchaca@bvesinc.com; regulatoryaffairs@bvesinc.com



January 8, 2024

Advice Letter No. 481-E

(U 913 E)

#### California Public Utilities Commission

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

**SUBJECT:** Vegetation Management Revenue Requirements Pursuant to PUC sec. 8386.3(d)

#### **PURPOSE**

Pursuant to Public Utilities Code 8386.3(d), BVES hereby submits this Tier 1 Advice Letter ("AL") to the California Public Utilities Commission ("Commission" or "CPUC") for information purposes only while a final decision is still pending in the BVES Test Year 2023 GRC proceeding (A.22-08-010).

#### **BACKGROUND**

In October 2019, the Legislature amended California Public Utilities Code Section 8386.3(d) through Senate Bill ("SB") 247 to, among other things, require an electrical corporation to notify the Commission by advice letter 30 days before the date when it projects that it will spend, or incur obligations to spend, its entire annual revenue requirement for vegetation management in its Wildfire Mitigation Plan ("WMP"). The statute also established qualifications for electrical line clearance tree trimmers and requires that qualified line tree trimmers be paid no less than a specified prevailing wage rate.

#### **DISCUSSION**

Although Section 8386.3(d) references an "annual revenue requirement for vegetation management in its wildfire mitigation plan," BVES does not currently have an approved annual revenue requirement for vegetation management for 2023. Rather, BVES's General Rate Case ("GRC") Decision No. ("D.") 19-08-027, authorized an annual revenue requirement for BVES's tree trimming and vegetation management program across its entire service territory for 2019 through 2022. D.19-08-027 also approved BVES's request to continue to record vegetation management costs in its Fire Hazard Prevention Memorandum Account ("FHPMA").

Subsequent to the Commission's approval of BVES's GRC decision, D.19-08-027, the Legislature enacted SB 247. Accordingly, the BVES vegetation management forecasts included in its GRC did not reflect the prevailing wage rate increases for line clearance tree trimmers that occurred as a result of the mandates in SB 247. As noted in BVES Advice

Letter 420-E, the impact of SB 247 on BVES vegetation management costs is significant. On May 19, 2021, following BVES's submission of Advice Letter 420-E, the Commission requested BVES tree trimmers' contract and hourly rates data. The data shows that average hourly rates increased by 82 percent between 2019 and 2020. These vegetation management costs are included in BVES's WMP.

Because BVES projects costs for overall vegetation management in 2023 exceeded the latest approved annual revenue requirement for 2022, out of an abundance of caution, and in the spirit of PUC section 8386.3, BVES is notifying the Commission that BVES filed its GRC application on August 30, 2022 to request, among many other matters, the recovery and amortization of vegetation management costs recorded in the FHPMA and a revenue requirement for vegetation management costs for the years 2023 through 2026.

#### **COMPLIANCE**

This advice letter requests approval in compliance with PUC Section 8386.3(d).

#### TIER DESIGNATION

This advice letter is submitted with a Tier 1 designation.

#### **EFFECTIVE DATE**

BVES respectfully requests this advice letter becomes effective on January 8, 2024.

#### 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 submission. 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 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 Dept.

E-mail: Regulatory Affairs@bvesinc.com

If you have not received a reply to your protest within 10 business days, please contact Jeffrey 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:

Jeffrey Linam
Manager, Regulatory Affairs
Bear Valley Electric Service, Inc.
630 East Foothill Blvd.
San Dimas California 01772

San Dimas, California 91773

Email: Regulatory Affairs@bvesinc.com

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

Sincerely,

/s/Alicia Menchaca

Alicia Menchaca

Rate Analyst, Regulatory Affairs

cc: Jenny Au, Energy Division R. Mark Pocta, California Public Advocates Office BVES General Order 96-B Service List

#### BEAR VALLEY ELECTRIC SERVICE, INC.

#### G.O. 96-B

#### **SERVICE LIST**

AGNES ROBERTS, FINANCIAL ANALYST <u>AGNES.ROBERTS@BBCCSD.ORG</u> EMAIL ONLY CITY CLERK CITY OF BIG BEAR LAKE 39707 BIG BEAR BLVD. P.O. BOX 10000 BIG BEAR LAKE, CA 92315

CITY ATTORNEY CITY OF BIG BEAR LAKE 39707 BIG BEAR BLVD. P.O. BOX 10000 BIG BEAR LAKE, CA 92315 COUNTY CLERK COUNTY OF SAN BERNARDINO 385 N. ARROWHEAD AVENUE – 2<sup>ND</sup> FLOOR SAN BERNARDINO, CA 92415-0140

COUNTY COUNSEL COUNTY OF SAN BERNARDINO 385 N. ARROWHEAD AVENUE – 2<sup>ND</sup> FLOOR SAN BERNARDINO, CA 92415-0140 ASST ATTORNEY GENERAL OFFICE OF THE ATTORNEY GENERAL STATE OF CALIFORNIA 300 SOUTH SPRING STREET LOS ANGELES, CA 90013

ERIC JANSSEN
ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVE., STE. 400
SACRAMENTO, CA 95816-5905
ERICJ@ESLAWFIRM.COM

WADE REESER, VP, OPERATIONS BIG BEAR MOUNTAIN RESORTS P.O. BOX 77, 880 SUMMIT BLVD. BIG BEAR LAKE CA 92315 WREESER@MAMMOTHRESORTS.COM

PETER EICHLER
LIBERTY UTILITIES
2865 BRISTOL CIRCLE
OAKVILLE, ONTARIO L6H 7H7
PETER.EICHLER@LIBERTYUTILITIES.COM

MIKE LONG
CALIFORNIA PACIFIC ELECTRIC CO., LLC
933 ELOISE AVENUE
SOUTH LAKE TAHOE, CA 96150
MIKE.LONG@LIBERTY-ENERGY.COM

RANDLE COMMUNICATIONS
500 CAPITOL MALL, SUITE 1950
SACRAMENTO, CA 95814
MGAZDA@RANDLECOMMUNICATIONS.COM

ITZIAR ROMO
OPR COMMUNICATIONS
19318 JESSE LANE, SUITE 200
RIVERSIDE, CA 92508
IROMO@OPRUSA.COM

FRED YANNEY, YANNEY LAW OFFICE 2082 MICHELSON DRIVE, SUITE 100 IRVINE, CA 92612 FREDYANNEY@GMAIL.COM BRENT TREGASKIS BEAR MOUNTAIN RESORT P O BOX 77 BIG BEAR LAKE, CA 92315

SOUTHERN CALIFORNIA EDISON CO. P. O. BOX 800 ROSEMEAD, CA 91770 PATRICK O'REILLY OPR COMMUNICATIONS 19318 JESSE LANE, SUITE 200 RIVERSIDE, CA 92508 POREILLY@OPRUSA.COM

ARLENE HERRERA
OPR COMMUNICATIONS
19318 JESSE LANE, SUITE 200
RIVERSIDE, CA 92508
AHERRERA@OPRUSA.COM

NAVAL FACILITIES ENGINEERING COMMAND REA. D. ESTRELLA SOUTHWEST DIVISIONM 1220 PACIFIC HIGHWAY SAN DIEGO, CA 92132 REA.ESTRELLA@NAVY.MIL

LIBERTY UTILITIES
9750 WASHBURN ROAD
DOWNEY, CA 90241
AdviceLetterService@libertyutilities.com

DOWNEY BRAND LLP 455 MARKET STREET, SUITE 1500 SAN FRANCISCO, CA 94105 msomogyi@DowneyBrand.com tmacbride@DowneyBrand.com

mday@DowneyBrand.com

BRIAN T. CRAGG
DOWNEY BRAND LLP
455 MARKET STREET, SUITE 1500
SAN FRANCISCO, CA 94105
BCRAGG@DOWNEYBRAND.COM

WILLIAM A. MONSEN MRW & ASSOCIATES, LLC 1736 FRANKLIN STREET, SUITE 700 OAKLAND, CA 94612 WAM@MRWASSOC.COM