



ADVICE LETTER SUMMARY

ENERGY UTILITY



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: nquan@gswater.com

E-mail Disposition Notice to: nquan@gswater.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 388-E

Tier Designation: 1

Subject of AL: 2019 Risk Spending Accountability Report

Keywords (choose from CPUC listing): Compliance, GRC,

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-08-027

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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: 3/31/20

No. of tariff sheets: N/A

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: N/A

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
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
Address: 630 E. Foothill Blvd
City: San Dimas State: California
Telephone (xxx) xxx-xxxx: (909) 394-3600 x682
Facsimile (xxx) xxx-xxxx: (909) 394-7427
Email: ZENG.ZHU@gswater.com



May 14, 2020

Advice Letter No. 388-E

(U 913 E)

California Public Utilities Commission

Golden State Water Company ("GSWC") hereby transmits one original and two conformed copies of this Information-Only advice letter on behalf of its Bear Valley Electric Service ("BVES") division.

SUBJECT: 2019 Risk Spending Accountability Report

PURPOSE

The purpose of this filing is to submit an information-only advice letter, which provides a comparison of BVES actual expenditures to adopted expenditures, as approved in California Public Utilities Commission ("Commission") Decision No. ("D.") 19-08-027.

BACKGROUND

On August 15, 2019, the Commission issued D.19-08-027, approving the Settlement Agreement signed by all parties, to resolve the 2018 General Rate Case application of BVES. Furthermore, D. 19-08-027 adopts specific maintenance, safety and reliability programs for BVES to be included in the annual Risk Spending Accountability Report ("RSAR"), pursuant to D.19-04-020, which adopted the Risk Spending Accountability Report Requirement

COMPLIANCE

BVES is filing this advice letter in accordance with Ordering Paragraph No. 17 in D.19-08-027, which states,

17. Golden State Water Company, on behalf of its Bear Valley Electric Service Division, shall file an information-only advice letter within 60 days of the issuance of the final decision in this proceeding, and annually by March 31 of each succeeding year, which includes a comparison of actual expenditures to adopted expenditures as approved in this decision for safety, reliability, and maintenance programs pursuant to the reporting requirements of Decision (D.) 19-04-020 and Public Utilities Code Section 591 relating to the Risk Spending Accountability Report. The March 31 due date revises the date previously set in D.19-04-020. The advice letters shall be filed with the Energy Division's Tariff Unit and served on the appropriate general rate case proceedings.

The Commission issued D.19-08-027 on August 15, 2019. On October 14, 2019, GSWC filed Advice Letter No. (“AL”) 371-E showing the RSAR expenses and budget for 2018. On April 28, 2020 the Commission approved AL 371-E with conditions. In its approval letter for AL 371-E, Energy Division made the following statements/recommendations:

In April 2019, the CPUC issued Decision (D.) 19-04-020 modifying the selection criteria and revising the reporting guidance for utilities. ED staff calls attention to Ordering Paragraph 13 in D.19-04-020 which requires BVES to file annual RSARs in the GRC proceeding in which funding for risk mitigation spending was authorized, starting with a report covering 2019.

In addition, D.19-04-020 provides Small and Multi-Jurisdictional Utilities (SMJUs) the following direction: “We direct the SMJUs to follow the general RSAR procedures outlined in Attachment [2], providing the same level of detail on the utility’s risk mitigation and risk spending as presented in its GRC, unless otherwise directed by Commission Staff.” Attachment 2, Section I contains eight guiding principles for preparing RSARs that expand on the General Guidance six principles. As a result, BVES should prepare its future RSARs by following procedures outlined in D.19-04-020, Attachment 2, consistent with Commission direction.

In August 2019, the CPUC issued D.19-08-027, adopting 2018 through 2022 revenue requirements for BVES. The decision also adopted reporting requirements and specified a list of programs for BVES to report on in its annual RSARs.⁵ BVES should provide a report on spending in all safety, reliability, and maintenance programs adopted in D.19-08-027.

Advice Letter No. 388-E complies with the requirements to report on spending in all BVES safety, reliability, and maintenance programs adopted in D.19-08-027 and approved in AL 371-E. In addition, this report follows the template provided by the Energy Division.

ATTACHMENT

Attachment A: 2019 Risk Spending Accountability Report of capital programs adopted in D.19-08-027.

TIER DESIGNATION

This advice letter is submitted with a Tier 1 designation.

EFFECTIVE DATE

BVES respectfully requests this advice letter become effective on March 31, 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 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 e-mail 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

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/ Nguyen Quan

Nguyen Quan

Manager, Regulatory Affairs

- c: Edward Randolph, Director, CPUC - Energy Division
- Franz Cheng, CPUC- Energy Division
- R. Mark Pocta, Cal PA
- Leslie Palmer, Director Safety and Enforcement Division
- Rachel Peterson, Acting Director Safety Policy Division

ATTACHMENT A

**BVES 2019 Risk Safety Accountability Report (RSAR) on the Safety,
Reliability and Maintenance Projects as Authorized in D.19-08-027**

Bear Valley Electric Service 2019 Risk Spending Accountability Report

	Authorized Budget	Recorded Budget	Variance (\$)	Variance (%)	Explanation for Variance Greater Than 20%
Overall Capital activities relating to safety, reliability or maintenance authorized.	\$ 8,764,354	\$ 7,387,462	\$ 1,376,892	16%	Within 20% variance.
Overall O&M Expense activities relating to safety, reliability or maintenance authorized	\$ 5,218,190	\$ 4,433,043	\$ 785,147	15%	Within 20% variance.

Budget	Program	Authorized Budget	Recorded Budget	Variance (\$)	Variance (%)	Explanation for Variance Greater Than 20%
Capital	Pole Loading Assessment and Remediation Program	\$ 2,444,130	\$ 5,096,681	\$ (2,652,551)	-109%	In D. 19-08-027 the Commission authorizes BVES capital projects/programs budget of \$12,220,653 for 2018-2022, or approximately \$2,444,130 per year. In 2018, BVES expended \$1,471,019. Therefore, at end of 2019 BVES expended a total of \$6,567,700. The combined budget for 2018-2019 was \$4,888,260. Therefore, the 2018-2019 Variance (\$) was \$(1,679,440) and Variance (%) was -34%. In 2019 BVES ramped up production to mitigate high risk fire threat areas.
O&M Expense	Pole Loading Assessment and Remediation Program	\$ 287,010	\$ 100,267	\$ 186,743	65%	O&M Expense aspect of Pole Loading Assessment and Remediation Program was less than budgeted due to vacancy in inspection staff.
O&M Expense	Vegetation Management	\$ 338,793	\$ 902,447	\$ (563,654)	-166%	In D. 19-08-027 the Commission authorizes BVES to recover incremental costs of \$338,793 recorded in its Fire Hazard Prevention Memorandum Account (FHPMA). The FHPMA was established in compliance with D. 09-08-029 in order to recover the costs of Vegetation Management in high fire threat areas. D.19-08-027 also authorizes BVES to continue recording incremental costs above the amount of \$338,793 for vegetation management associated with fire safety and fire prevention corrective action measures in high fire threat areas. Expenses in this area are substantially high due to implementing increased clearance fire prevention measures per D.17-12-024.
O&M Expense	Electrical Preventative Maintenance	\$ 105,566	\$ 32,395	\$ 73,171	69%	D.19-08-027 was issued in August 2019, this program did not start until late in 2019 reducing the period of program execution.
O&M Expense	Predictive Based Maintenance of Overhead Lines	\$ 96,073	\$ 60,104	\$ 35,969	37%	BVES was able to complete the prescribed work through a contractor at less than originally budgeted.

Capital	Tree Attachment Removal	\$ 762,018	\$ 701,348	\$ 60,670	8%	Within 20% variance. D.19-08-027 authorizes a 2018-2022 budget of \$3,660,090 for this project or approximately \$732,018 per year. Additionally, BVES has combined this project with the "Shifting Tree Attachment to Poles/Underground Projects" listed below. Thereby, adding \$30,000 per year to the budget for a total of \$762,018 per year.
Capital	BVPP – Install Engine System Monitor	\$ 915,961	\$ -	\$ 915,961	100%	Project was originally programmed for 2019. D.19-08-027 was issued in August 2019, there was insufficient time to bid out and complete the work in 2019. Therefore the project was deferred to 2020 and no CAPEX expense was made in 2019 for this project. BVPP engines are needed to be fully operational from October to April to support winter peaking load.
Capital	BVPP – Oil Filter Conversion and Cylinder Upgrades	\$ 887,898	\$ -	\$ 887,898	100%	Project is programmed for 2021; therefore, no CAPEX expense was made in 2019 for this project.
Capital	Safety and Technical Upgrades of Palomino Substation	\$ 1,551,773	\$ -	\$ 1,551,773	100%	Project programmed for 2020; therefore, no CAPEX expense was made in 2019 for this project. This project is on track for completion in 2020.
Capital	Replacement of Fawnskin Conductors	\$ 182,890	\$ -	\$ 182,890	100%	Project was programmed for 2019. D.19-08-027 was issued in August 2019, project was deferred to 2020. Due to winter weather, BVES's construction period ends in October and starts up again in April. Therefore, there was insufficient time to start and complete the project in 2019.
Capital	Replacement of Summit Conductors	\$ 185,010	\$ 387,806	\$ (202,796)	-110%	Project was originally programmed for 2020, it was actually performed in Test Year 2018 to jump start BVES compliance with safety and reliability requirements. The project was significantly over budget due to more poles being required to be replaced than originally anticipated.
Capital	Replacement of Baldwin Conductors	\$ 184,674	\$ -	\$ 184,674	100%	Project is programmed for 2021; therefore, no CAPEX expense was made in 2019 for this project.
Capital	GO 174 Substation Safety and Reliability Compliance Projects	\$ 410,000	\$ 275,272	\$ 134,728	33%	D.19-08-027 was issued in August 2019, some aspects of the project were deferred to 2020. Due to winter weather, BVES's construction period ends in October and starts up again in April. Therefore, there was insufficient time to start and complete all aspects of the project in 2019
Capital	Wire Upgrade and Relocation Project	\$ 80,000	\$ 79,145	\$ 855	1%	Within 20% variance.

Capital	GO 95/165 Safety and Reliability Compliance Projects	\$ 925,000	\$ 649,134	\$ 275,866	30%	BVES under spent in this capital program due to its efforts to ramp up its limited staff resources on getting the Pole Loading Program and Tree Attachment Removal Project, noted above, on track. BVES ensured safety related work was completed. BVES has taken action to ensure it will not have this issue in 2020.
Capital	Shifting Tree Attachment to Poles/Underground Projects	\$ 30,000	\$ -	\$ 30,000	100%	This project has been combined with the Tree Attachment Removal Project, noted above, and is tracked there.
Capital	Public Works Project Support	\$ 30,000	\$ 27,427	\$ 2,573	9%	Within 20% variance.
Capital	Office Furniture and Equipment Project	\$ 25,000	\$ 23,755	\$ 1,245	5%	Within 20% variance.
Capital	BVPP Misc. Tools & Safety Equipment Project	\$ 20,000	\$ 11,011	\$ 8,989	45%	Safety project to install seismic gas cutout valve was completed under budget.
Capital	Field Operations Misc. Tools & Safety Equipment Project	\$ 85,000	\$ 95,576	\$ (10,576)	-12%	Within 20% variance.
Capital	Minor Additions to General Structure Project	\$ 45,000	\$ 40,307	\$ 4,693	10%	Within 20% variance.
O&M Expense	Power Generation Maintenance (FERC 546-555)	\$ 1,461,886	\$ 755,761	\$ 706,125	48%	BVES's power plant, Bear Valley Power Plant (BVPP), system is small with 7 natural gas fired generators, a total of 8.4 MW. The O&M budget is composed of routine and unplanned preventative maintenance, as well as inspections. While routine preventative maintenance can be reliably anticipated, corrective maintenance on such a small system will have significant variance. For example, in a year where one engine requires significant repair, the O&M expense may be driven up significantly. In 2019, BVES completed all planned routine preventative maintenance and inspections on the BVPP. There was no failure that requires significant corrective action and expense, which results in actual expense being less than budget.
O&M Expense	Transmission System Maintenance (FERC 562-573)	\$ 294,316	\$ 102,600	\$ 191,716	65%	BVES's transmission system is small. The O&M budget is composed of routine and unplanned preventative maintenance, and inspections. While routine preventative maintenance can be anticipated reliably, corrective maintenance on such small system will have significant variance. For example, in a year where one large transformer repair occurs, the O&M expense may be driven up significantly. The authorized budget was developed based on a trended average with significant variance in the cost data due to the reasons mentioned above. In 2019 BVES completed all planned routine preventative maintenance and inspections and did not experience failures requiring significant corrective action expense. Therefore, the actual expense was less than budget.

O&M Expense	Regional Market Equipment Maintenance (FERC 576)	\$ 9,042	\$ 9,930	\$ (888)	-10%	Within 20% variance.
O&M Expense	Distribution System Maintenance (FERC 580-598)	\$ 2,566,902	\$ 2,419,700	\$ 147,202	6%	Within 20% variance.
O&M Expense	General Plant Maintenance (FERC 935)	\$ 58,602	\$ 49,839	\$ 8,763	15%	Within 20% variance.

GOLDEN STATE WATER COMPANY

G.O. 96-B
SERVICE LIST

BEAR VALLEY ELECTRIC SERVICE DIVISION

AGNES ROBERTS, FINANCIAL ANALYST
AGNES.ROBERTS@BBCCSD.ORG
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 - 2ND FLOOR
SAN BERNARDINO, CA 92415-0140

COUNTY COUNSEL
COUNTY OF SAN BERNARDINO
385 N. ARROWHEAD AVENUE - 4TH FLOOR
SAN BERNARDINO, CA 92415-0140

HERSCHEL T. ELKINS
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
MCARDONA@RANDLECOMMUNICATIONS.COM
MGAZDA@RANDLECOMMUNICATIONS.COM

MEGAN SOMOGYI
GOODIN, MACBRIDE, SQUERI & DAY, LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
MSOMOGY@GOODINMACBRIDE.COM

FRED YANNEY, YANNEY LAW OFFICE
17409 MARQUARDT AVENUE, UNIT C-4
CERRITOS, CA 90703
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