



February 6, 2019

Advice Letter No. 359-E

(U 913 E)

California Public Utilities Commission

Golden State Water Company ("GSWC"), on behalf of Bear Valley Electric Service ("BVES"), hereby transmits for filing an original and two conformed copies of this advice letter with the California Public Utilities Commission ("Commission").

SUBJECT: GHG Emissions Performance Standard ("EPS") Compliance Filing

Purpose

This Attestation Letter notifies the Commission that in 2018 BVES did not enter into any long-term financial commitments subject to the EPS. A signed Attachment 1 entitled "Compliance Filing for LSEs with no Long-Term Financial Commitments" is enclosed with this Advice Letter.

Background

Commission Decision No. ("D.") 07-01-039 requires all Load Serving Entities ("LSE") to file annual Attestation Letters, due February 15 of each year, attesting to the Commission that the financial commitments entered into for generation during the prior calendar year are in compliance with the emissions performance standard. D. 07-01-039 requires LSE's to file Attestation Letters as an advice letter and serve the letter on the service list in Rulemaking No. ("R") 06-04-009. Specifically, Ordering Paragraph No. 4 of the aforementioned decision states:

4. All LSEs other than PG&E, SCE and SDG&E are required to file annual Attestation Letters, due by February 15 of each year, attesting to the Commission that the financial commitments entered into during the prior calendar year are in compliance with the EPS. The Attestation Letter shall include a certification, including the name and contact information for the LSE officer(s) certifying the following under penalty of perjury:

- A. have reviewed, or have caused to be reviewed, this compliance submittal.*
- B. Based on my knowledge, information, or belief, this compliance submittal does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements true.*
- C. Based on my knowledge, information, or belief, this compliance submittal contains all of the information required to be provided by Commission orders, rules and regulations.*

The Attestation Letter shall be filed as an advice letter and served on the service list in this proceeding, or its successor proceeding. The Attestation Letter shall be subject to the Commission procedures governing advice letter filings, which include opportunity for protests and responses. However, no Attestation Letter shall be "deemed approved" under those procedures.

Energy Division shall review each Attestation Letter and approve it if it contains all the elements required by the EPS documentation requirements, includes a certification by the responsible corporate officers, and if the facts stated in the Attestation Letter show compliance with the EPS. Energy Division approval of the Attestation Letter means that the Attestation Letter is in compliance with these rules, and that any procurements as reported in the Attestation Letter comply with the requirements of the EPS program. Energy Division approval does not mean that LSE procurements that are unreported or inaccurately reported comply with the EPS. LSEs shall be subject to penalties if the attestation letters are found, at a later date, to be incomplete, misleading or incorrect.

This advice letter adheres to the provisions in D.07-01-039.

Tier Designation

This advice letter is submitted with a Tier 2 designation.

Effective Date

GSWC is requesting an effective date of March 8, 2019

Notices 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.

Distribution of this advice letter is being made to the attached service list in accordance with General Order 96-B. A copy of this advice letter is being furnished to the entities listed on the service list for R.06-04-009.

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
Telephone: (909)-394-360
Email: nquan@gswater.com

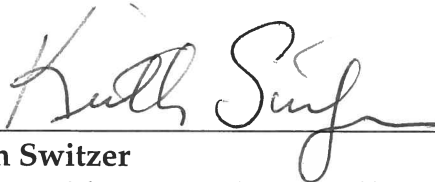
Certification

I have reviewed, or have caused to be reviewed, this compliance submittal.

Based on my knowledge, information, or belief, this compliance submittal does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements true.

Based on my knowledge, information, or belief, this compliance submittal contains all of the information required to be provided by Commission Orders, rules and regulations.

GOLDEN STATE WATER COMPANY



Keith Switzer
Vice President, Regulatory Affairs
(909) 394-3600
kswitzer@gswater.com

Attachment 1

Compliance Filing for LSEs who have no Long-Term Financial Commitments

February 6, 2019

CA Public Utilities Commission
Energy Division
Attention: Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298

Re: GHG Environmental Performance Standard (EPS) Compliance Filing 2019

Pursuant to Ordering Paragraph No. 4 of Decision No. (“D.”) 07-01-039, issued in R. 06-04-009 on January 25, 2007, Golden State Water Company dba Bear Valley Electric Service (BVES) submits this annual Attestation Letter affirming that the financial commitments BVES has entered into for generation during the prior calendar year are in compliance with the greenhouse gas (“GHG”) emissions performance standard (“EPS”). Specifically, BVES is in compliance with the EPS as it has no generation facilities and no long-term financial commitments for generation.

Effective Date: March 8, 2019

Tier Designation: Tier 2 Designation

Purpose

This Attestation Letter provides information and documentation required by D.07-01-039. This Attestation Letter demonstrates that for **2018** BVES has entered into financial commitments that are in compliance with the EPS (long-term financial commitments defined on Page 3 of Attachment 7 in D.07-01-039).

Background

D.07-01-039 requires all Load Serving Entities (“LSEs”) to file annual Attestation Letters by February 15 of each year, attesting to the Commission that the financial commitments entered into for generation during the prior calendar year are in compliance with the EPS. D.07-01-039 requires LSEs to file Attestation Letters as an advice letter and serve the Attestation Letter on the service list in Rulemaking (“R.”) 06-04-009. This Attestation Letter is filed pursuant to that process.

D.07-01-039 requires LSEs to list long-term financial commitments of five years or longer that they have entered into during the prior year. Furthermore, D.07-01-039 requires documentation demonstrating that LSEs have complied with the EPS, by demonstrating:

- (a) That the commitments were not “covered procurements” under the interim EPS rule and/or
- (b) For those that represent covered procurements, documentation demonstrating that such procurements are EPS-compliant, including any contracts with a term of five years or longer that include provisions for substitute energy purchases.
- (c) For any requested reliability-based exemptions that have been pre-approved by the Commission, a reference to the application and Commission decision number.

D.07-01-039 requires all LSEs to disclose the investment amount and type of alteration to retained generation, by generation facility and unit. D.07-01-039 also advises LSEs to present documentation regarding the design and intended use of the powerplant(s) underlying their new long-term financial commitments utilizing the sources of information listed in California Public Utilities Code § 8341(b)(4), as well as any other sources of documentation that they believe will be relevant to this determination.

D.07-01-039 emphasizes that the key concept is to establish the design and intended use of the powerplant. Accordingly, documentation of the annualized plant capacity factor for the powerplant should include historical annual averages in order to help determine whether the plant is “designed and intended” to be used for baseload generation. D.07-01-039 requires LSEs to provide documentation of capacity factors, heat rates, and corresponding emissions rates that reflect the actual, expected operations of the plant.

This Attestation Letter comports with the requirements outlined above.

Protests

This compliance filing is not subject to protest pursuant to General Order 96-B, Energy Industry Rule 9.

Correspondence

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

Nguyen T Quan
Golden State Water Company
630 East Foothill Blvd
San Dimas, California 91773
(909) 394-3600
nquan@gswater.com

Certification

- (1) I have reviewed, or have caused to be reviewed, this compliance submittal.
- (2) Based on my knowledge, information, or belief, this compliance submittal does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements true.
- (3) Based on my knowledge, information, or belief, this compliance submittal contains all of the information required to be provided by Commission orders, rules, and regulations.

Include the name and contact information for the LSE officer(s) certifying the above:



Keith Switzer
Vice President, Regulatory Affairs
Golden State Water Company
630 East Foothill Blvd
San Dimas, California 91773
(909) 394-3600
kswitzer@gswater.com

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

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39707 BIG BEAR BLVD.
P.O. BOX 10000
BIG BEAR LAKE, CA 92315

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CITY OF BIG BEAR LAKE
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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
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OFFICE OF THE ATTORNEY GENERAL
STATE OF CALIFORNIA
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BIG BEAR LAKE, CA 92315

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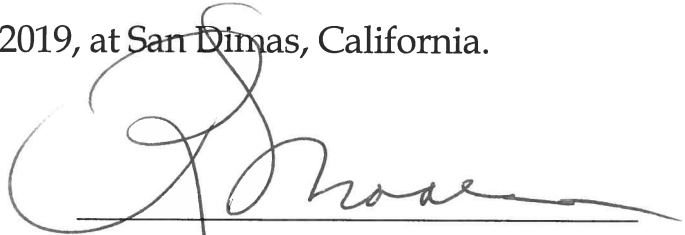
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REA. D. ESTRELLA
SOUTHWEST DIVISIONM
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132
REA.ESTRELLA@NAVY.MIL

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Golden State Water Company (doing business as Bear Valley Electric Service) and on this 6th day of February 2019, I served each party on the CPUC website listed in Docket No. R.06-04-009 and those listed on Bear Valley Electric Service G.O. 96-B Service List with a copy of Golden State Water Company's Advice Letter 359-E, via electronic mail. U. S. Mail will be used if electronic service cannot be effectuated.

Executed on February 6, 2019, at San Dimas, California.

A handwritten signature in black ink, appearing to read "R. Moore", written over a horizontal line. The signature is fluid and cursive.

Ronald Moore, Analyst
Regulatory Affairs Department

R.06-04-009 Revised E-Mail Distribution List

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