



September 4, 2018

Advice Letter No. 347-E

(U 913 E)

California Public Utilities Commission

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

<u>CPUC Sheet No.</u>	<u>Title of Sheet</u>	<u>CPUC Sheet No.</u>
Original No. 2554-E	Preliminary Statement Part KK	
Revised No. 2555-E	Table of Contents Page 1 of 3	Revised No. 2553-E

SUBJECT: *Emergency Customer Protection Memorandum Account*

PURPOSE

The purpose of this filing is to revise BVES's Preliminary Statement to include the Emergency Customer Protection Memorandum Account ("ECPMA"). Pursuant to California Public Utilities Commission's ("Commission") Decision No. ("D.") 18-08-004, dated August 9, 2018, GSWC is authorized to establish a ECPMA to track costs for implementing customer protections for all disasters, when a state of emergency has been declared by the Governor of California.

BACKGROUND

The Commission issued Resolution Nos. M-4833 and M-4835, on November 9, 2017 and January 11, 2018, respectively, to required electric, gas, telephone, water and sewer utilities to take prudent and necessary steps to assist Californians affected by the 2017 wildfires in Northern and Southern California. The residential and non-residential customer protections in Resolution M-4833 and M-4835 were aimed to help Californians who experienced housing or financial crises due to these 2017 wildfires. The protections implemented in Resolution Nos. M-4833 and M-4835 consist of the following:

1. Waive deposit requirements for affected residential customers seeking to reestablish service for one year and expedite move-in and move-out service requests.
2. Stop estimated energy usage for billing attributed to the time period when the home/unit was unoccupied as result of the emergency;
3. Discontinue billing;
4. Prorate any monthly access charge or minimum charges;
5. Implement payment plan options for residential customers;
6. Suspend disconnection for non-payment and associated fees, waive deposit and late fee requirements for residential customers;
7. Support low-income residential customers by: (a) freezing all standard and high-usage reviews for the California Alternate Rates for Energy (CARE) program eligibility in impacted counties until at least the end of the year and potentially longer, as warranted; (b) contact all community outreach contractors, the community based organizations who assist in enrolling hard-to-reach low-income customers into CARE, in impacted counties to help better inform customers of these eligibility changes; (c) partner with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount for the next 12 months for impacted customers; and (e) indicate how the energy savings assistance program can be deployed to assist impacted customers; and
8. Track costs in an appropriate memorandum account which shall be re-named the Emergency Customer Protections Memorandum Account from the Wildfires Customer Protections Memorandum Account and as appropriate, costs may be tracked in the Catastrophic Event Memorandum Account ("CEMA").
9. Follow the requirements that were stipulated for non-residential customers in Resolution M-4833 and M-4835.

In March 2018, the Commission issued a quasi-legislative Order Instituting Rulemaking No. 18-03-011 ("OIR" or "R.18-03-011") to consider permanently adopting the protections ordered in Resolutions M-4833 and M-4835. The rules would be applicable to all electric, gas, telephone, water and sewer utilities under the Commission's jurisdiction. The OIR would make available comparable post-disaster customer protections in the event the Governor of California declares a catastrophic event.

Subsequently, on August 9, 2018, the Commission issued D. 18-08-004, in R.18-03-011, to order utilities under its jurisdiction to set in place interim protections that are to be implemented upon a declaration of a state of emergency by the Governor of California, when a disaster results in a loss, disruption or degradation of utility service.

The purpose and intent of D.18-08-004, is to retain interim emergency protocols and protections to assist customers in the event of a declared catastrophic event and to ensure continuity of service. The period for which the protections apply shall be consistent with the determinations of Resolution Nos. M-4833 and M-4835 or until service is restored. The customers that will be afforded relief (covered) will be those affected in the counties declared in the Governor's state of emergency.

D.18-08-004 requires BVES and other regulated electric and natural gas utilities to file a Tier 1 Advice Letter with the Commission's Energy Division within 15 days of the Governor's state of emergency, in compliance with the directives in D. 18-08-004.

Lastly, Ordering Paragraph Nos 1, 2, and 3 in D. 18-08-004, states,

1. *The Commission's adopted emergency customer protections in Resolutions M-4833 and M-4385 shall apply to affected areas in a state of emergency declared by the Governor's Office and shall remain in effect pursuant to the timelines established in Resolutions M-4833 and M-4835 or until there is full restoration of utility service. Nothing in this Decision bars or otherwise prohibits utilities from implementing their own disaster assistance programs to supplement these adopted emergency customer protections.*
2. *In the event the Governor of California declares a state of emergency because a disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility service: (1) Pacific Gas and Electric Company; (2) Southern California Edison Company; (3) San Diego Gas and Electric Company; (4) Southern California Gas Company; (5) PacifiCorp; (6) Liberty Utilities (CalPeco Electric LLC); (7) Bear Valley Electric Service (a division of Golden State Water Company); (8) Alpine Natural Gas, Inc.; (9) Southwest Gas Corporation; (10) West Coast Gas Company, Inc.; (11) Catalina Island Gas Services shall file a Tier 1 Advice Letter within 15 days of the Governor's state of emergency proclamation reporting compliance with Resolutions M-4833 and M-4835 pursuant to this Decision.*
3. *Pacific Gas and Electric Company, (2) Southern California Edison Company; (3) San Diego Gas and Electric Company, (4) Southern California Gas Company, (5) PacifiCorp, (6) Liberty Utilities (CalPeco Electric LLC), (7) Bear Valley Electric Service (a division of Golden State Water Company), (8) Alpine Natural Gas, Inc., (9) Southwest Gas Corporation, (10) West Coast Gas Company, Inc., and (11) Catalina Island Gas Services*

shall file a Tier 2 Advice letter no later than 30 days from the date of this decision stating that they have modified or implemented, as appropriate, their respective Emergency Customer Protections Memorandum Accounts and to extend their applicability of those memorandum accounts to costs for implementing customer protections for all disasters where the Governor of California has declared a state of emergency and accordingly, state which tariff changes, if any and if necessary, pursuant to this Decision. Emergency Customer Protections Memorandum Account tariff language must specify that entries in the account will be segregated by qualifying event.

DISCUSSION

GSWC is committed to working with the appropriate agencies to take the necessary steps in order to continue, implement and activate the provisions in Resolution Nos. M-4833 and M-4835, as detailed in D.18-08-004. GSWC will undertake any additional customer support initiatives under its discretion, in addition to and complementary to the protocols in D.18-08-004.

ECPMA AND ELIGIBILITY

The ECPMA will track all incremental costs associated with complying with all the following emergency customer protections being afforded to residential and non-residential customers impacted by a declared state of emergency by the Governor of the State of California:

1. Waive deposit requirements for affected residential customers seeking to reestablish service for one year and expedite move-in and move-out service requests.
2. Stop estimated energy usage for billing attributed to the time period when the home/unit was unoccupied as result of the emergency;
3. Discontinue billing;
4. Prorate any monthly access charge or minimum charges;
5. Implement payment plan options for residential customers;
6. Suspend disconnection for non-payment and associated fees, waive deposit and late free requirements for residential customers;
7. Support low-income residential customers by: (a) freezing all standard and high-usage reviews for the California Alternate Rates for Energy (CARE) program eligibility in impacted counties until at least the end of the year and potentially longer, as warranted; (b) contact all community outreach contractors, the community based organizations who assist in enrolling hard-to-reach low-income customers into CARE, in impacted

counties to help better inform customers of these eligibility changes; (c) partner with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount for the next 12 months for impacted customers; and (e) indicate how the energy savings assistance program can be deployed to assist impacted customers; and

8. Track costs in an appropriate memorandum account which shall be re-named the Emergency Customer Protections Memorandum Account from the Wildfires Customer Protections Memorandum Account and as appropriate, costs may be tracked in the Catastrophic Event Memorandum Account (CEMA).
9. Follow the requirements that were stipulated for non-residential customers in Resolution M-4833 and M-4835.

Additionally, costs for customer noticing, any costs to determine claim validity (outside services, if necessary), other customer care services needed, as well as incremental costs complying with D.18-08-004 will be recorded in the ECPMA.

Please note: In regards to Item 8 above, BVES was not ordered to establish a Wildfire Customer Protections Memorandum Account in Resolution Nos. M-4833 nor M-4835. The ECPMA being requested in this advice letter is BVES' initial emergency customer protections implementation request.

COMPLIANCE

GSWC is filing this advice letter in accordance with Ordering Paragraph No. 5 in D.18-08-004, which states,

5. Pacific Gas and Electric Company, (2) Southern California Edison Company; (3) San Diego Gas and Electric Company, (4) Southern California Gas Company, (5) PacifiCorp, (6) Liberty Utilities (CalPeco Electric LLC), (7) Bear Valley Electric Service (a division of Golden State Water Company), (8) Alpine Natural Gas, Inc., (9) Southwest Gas Corporation, (10) West Coast Gas Company, Inc., and (11) Catalina Island Gas Services shall file a Tier 2 Advice letter no later than 30 days from the date of this decision stating that they have modified or implemented, as appropriate, their respective Emergency Customer Protections Memorandum Accounts and to extend their applicability of those memorandum accounts to costs for implementing customer protections for all disasters where the Governor of California has declared a state of emergency and accordingly, state which tariff changes, if any and if necessary, pursuant to this Decision. Emergency Customer Protections Memorandum Account tariff language must specify that entries in the account will be segregated by qualifying event.

TIER DESIGNATION

This advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

GSWC is requesting that this filing become effective on October 4, 2018.

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.

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.

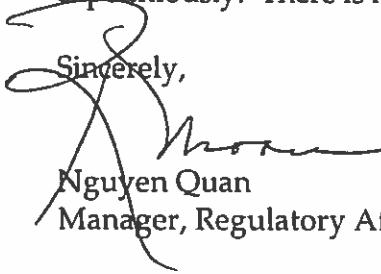
CORRESPONDENCE

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,



For Nguyen Quan.

Nguyen Quan
Manager, Regulatory Affairs

c: Edward Randolph, Director, CPUC – Energy Division
Dorothy Duda, Energy Division
R. Mark Pocta, PAO

PRELIMINARY STATEMENTS

(Continued)

KK. Emergency Costumer Protection Memorandum Account ("ECPMA")

(N)

Golden State Water Company ("GSWC"), on behalf of its Bear Valley Electric Service ("BVES") establishes the Emergency Customer Protection Memorandum Account ("ECPMA"), which was authorized in the Commission's Decision No. 18-08-004.

1. Purpose

The purpose of the ECPMA is to record incremental costs and bill adjustments associated with providing emergency customer protections after the Governor of the State of California declares a state of emergency, that affects all or part of the BVES customer service territory. The ECPMA shall include, but not limited to, incremental costs and bill adjustments associated with implementing the following emergency customer protections:

- a. Waive deposit requirements for affected residential customers seeking to reestablish service for one year and expedite move-in and move-out service requests;
- b. Stop estimated energy usage for billing attributed to the time period when the home/unit was unoccupied as result of the emergency;
- c. Discontinue billing;
- d. Prorate any monthly access charge or minimum charges;
- e. Implement payment plan options for residential customers;
- f. Suspend disconnection for non-payment and associated fees, waive deposit and late free requirements for residential customers;
- g. Support low-income residential customers by: (a) freezing all standard and high-usage reviews for the California Alternate Rates for Energy (CARE) program eligibility in impacted counties until at least the end of the year and potentially longer, as warranted; (b) contact all community outreach contractors, the community based organizations who assist in enrolling hard-to-reach low-income customers into CARE, in impacted counties to help better inform customers of these eligibility changes; (c) partner with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount for the next 12 months for impacted customers; and (e) indicate how the energy savings assistance program can be deployed to assist impacted customers.

2. Applicability

The ECPMA does not have a rate component.

3. Eligibility

Impacted BVES' residential and non-residential customers will be offered emergency customer protection for catastrophic events, within BVES service territory, where the Governor of California has declared a state of emergency.

4. Accounting Procedures

- a. A debit entry shall be made to the ECPMA at the end of each month to record incremental costs and billing adjustments related to emergency customer protections when a state of emergency has been declared by the Governor of the State of California.
- b. A debit entry equal to interest on the balance in the account at the beginning of the month and half the balance of the above entry (a.), at a rate equal to one-twelfth of the rate on three-month Commercial Paper, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

5. Effective Date

The ECPMA shall have an effective date of October 4, 2018 and shall remain open until directed by the Commission.

6. Disposition

Disposition of amounts recorded in the ECPMA shall be determined in a General Rate Case or other appropriate ratemaking proceeding, as authorized by the Commission.

(N)

Issued By

Advice Letter No. 347-E

R. J. Sprowls

Date Filed September 4, 2018

Decision No. 18-08-004

President

Effective October 4, 2018

Resolution No. _____

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		1441-E
Table of Contents		2555-E, 2522-E, 2139-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 2178-E, 2179-E, 2180-E, 2880-E, 1603-E*, 1604-E*, 1605-E*, 1606-E*, 1607-E*, 1608-E*, 1609-E*, 1610-E*, 1611-E*, 1650-E 1612-E*, 2201-E, 2440-E, 2441-E, 2515-E, 1926-E, 1928-E, 1929-E, 1946-W, 2028-E, 2032-E, 2034-E, 2489-E, 2490-E, 2483-E 2484-E, 2485-E, 2486-E, 2487-E, 2174-E, 2175-E, 2443-E, 2444-E, 2463-E, 2554-E (C)
Tariff Area Map		1140-E
Rate Schedules:		
No. A-1	General Service	2539-E, 1836-E
No. A-2	General Service	2540-E, 1838-E
No. A-3	General Service	2541-E, 1840-E
No. A-4	General Service- TOU	2542-E, 1842-E, 1843-E
No. A-5	TOU Primary	2543-E, 1845-E, 1846-E
No. A-5	TOU Secondary	2544-E, 1848-E, 1849-E
No. D	Domestic Service - Single-family Accommodation	2545-E, 1851-E, 1852-E
No. DE	Domestic Service to Company Employees	2546-E, 1854-E
No. D-LI	Domestic Service - CARE Rate	2547-E, 2517-E, 1857-E, 1858-E
No. DM	Domestic Service - Multi-family Accommodation	2548-E, 1860-E, 1861-E
No. DMS	Domestic Service - Multi-family Accommodation Sub-metered	2549-E, 2506-E, 1864-E
No. DO	Domestic Service -- Other	2550-E, 1866-E
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	2551-E, 1868-E
No. SL	Street Lighting Service	2552-E, 1870-E
No. SSC	Special Service Charges	2157-E, 2158-E
No. S Standby	Standby Service	2159-E, 2160-E, 2161-E
No. SMO	Smart Meter Opt-Out Residential Service	2445-E
No. PPC-LI	Public Purpose Charge-Low Income	1613-E
No. PPC-OLI	Public Purpose Charge-Other Than Low Income	1614-E
No. UF-E	Surcharge to Fund PUC Utilities Reimbursement Account Fee	2481-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	605-E, 606-E, 607-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	578-E, 579-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)

Issued By

Advice Letter No. 347-E

R. J. Sprowls

Date Filed September 4, 2018

Decision No. 18-08-004

President

Effective October 4, 2018

Resolution No.

GOLDEN STATE WATER COMPANY

DISTRIBUTION LIST

BEAR VALLEY ELECTRIC DIVISION

Agnes Roberts, Financial Analyst
Big Bear City Community Services District
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 Ave., 2nd Floor
San Bernardino, CA 92415-0140

County Counsel
County of San Bernardino
385 N. Arrowhead Ave., 4th Floor
San Bernardino, CA 92415-0140

Wade Reeser, VP Operations
Big Bear Mountain Resorts
P.O. Box 77, 880 Summit Blvd.
Big Bear Lake, CA 92315
Wreeser@Mammothresorts.com

Megan Somogyi
Goodin, MacBride, Squeri & Day, LLP
505 Sansome Street, Suite 900
San Francisco, CA 94111
MSomogyi@goodinmacbride.com

Randle Communications
500 Capitol Mall, Suite 1950
Sacramento, CA 95814
mcardona@randlecommunications.com
mgazda@randlecommunications.com