



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 (U 913-E)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Nguyen Quan

Phone #: (909) 394-3600 x664

E-mail: RegulatoryAffairs@bvesinc.com

E-mail Disposition Notice to: RegulatoryAffairs@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) #: 438-E et al

Tier Designation: 2

Subject of AL: Joint Tier 2 Advice Letter on Energy Savings Assistance Program Treatment Measures Categorization per Decision No. 21-10-023

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 #: Decision No. 21-10-023

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

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: 3/21/22

No. of tariff sheets: 0

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, 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: RegulatoryAffairs@bvesinc.com; nquan@gswater.com

Name: Zeng Zhu
Title: Rate Analyst
Utility Name: Bear Valley Electric Service, Inc
Address: 630 E. Foothill Blvd
City: San Dimas State: California
Telephone (xxx) xxx-xxxx: (909) 394-3600 x495
Facsimile (xxx) xxx-xxxx: (909) 394-7427
Email: RegulatoryAffairs@bvesinc.com; zeng.zhu@bvesinc.com



Bear Valley Electric Service, Inc.
P.O. Box 9028
San Dimas, CA 91773-9028
A Subsidiary of American States Water Company

February 18, 2022

Advice Letter No. 438-E	Bear Valley Electric Service, Inc. (U 913 E)
Advice Letter No. 188-E	Liberty Utilities (CalPeco Electric) LLC (U 933 E)
Advice Letter No. 678-E	PacifiCorp d/b/a Pacific Power (U 901 E)
Advice Letter No. 1203-G	Southwest Gas Corporation (U 905 G)
Advice Letter No. 63-G	Alpine Natural Gas Operating Company No. 1, LLC (U 909G)

California Public Utilities Commission

Bear Valley Electric Service, Inc. ("BVES"), on behalf of itself, PacifiCorp, d/b/a Pacific Power ("PacifiCorp"), Liberty Utilities (CalPeco Electric) LLC, Southwest Gas Corporation, and Alpine Natural Gas Operating Company No. 1, LLC (collectively, "Joint Utilities"), submits this Advice Letter providing categorization and delivery models for the Energy Savings Assistance program measures.

SUBJECT: *Joint Tier 2 Advice Letter on Energy Savings Assistance Program Treatment Measures Categorization per Decision No. 21-10-023.*

PURPOSE

California Public Utilities Commission ("CPUC" or "Commission") Decision ("D.") No. 21-10-023 Ordering Paragraph ("OP") 21 directs the Joint Utilities to file a Tier 2 advice letter to categorize the Energy Savings Assistance ("ESA") program measures approved by D.21-10-023 into two basic categories of treatment levels, Basic and Plus. OP 22 of D.21-10-023 requires the Joint Utilities to file as part of the Tier 2 advice letter, which set of measures will be part of the Basic or Plus offerings, including those provided through self-certification and those that are exempt.

This advice letter is submitted in compliance with OP 20, 21, and 22 of D.21-10-023.

BACKGROUND

The ESA program provides weatherization services and energy efficiency measures to help low-income households (single family, in-unit multifamily, and mobile homes) conserve energy and reduce energy costs while improving health, comfort, and safety. The ESA program provides information and education to promote energy efficient practices in low-income communities.

The Joint Utilities' most recent ESA program, PY 2021-2026, was approved in D.21-10-023. The Commission issued D.21-10-023 on October 21, 2021.

ESA PROGRAM MEASURES

D.21-10-023 approved program measures for each of the Joint Utilities. Each utility has various offerings. D.21-10-023 orders the Joint Utilities to meet and confer, and outline its categorization of ESA program measures into two treatment level categories: Basic, and Plus.

As ordered, the Joint Utilities convened over the course of several weeks to develop and provide the following:

- List of ESA program treatment measures offered by each utility.
 - Categorization of each utility measure's treatment level as Basic or Plus measure
 - Determination of Joint Utility alignment on treatment measures as "Basic" or "Plus" and discussion on any difference.
 - Alignment indicates if a measure is offered by all Joint Utilities (per relevant utility type) as a "Basic" or "Plus" measure.
- Allowance for Self-Certification.
- Reporting Categories and Segments definitions.
- Reporting Categories and Segments methodologies.
- Utility alignment regarding Categories and Segments definitions, and methodologies.
 - Explanation of deviations among utilities.

See attachment A and attachment B.

ATTACHMENTS

Attachment A: List of Measures, Segments and Treatment Tiers (PY 2021 – 2026)

Attachment B: List of Reporting Categories and Segments - Definitions and Methodologies (PY2021 - 2026)

COMPLIANCE

This advice letter is submitted in compliance with D.21-10-023.

TIER DESIGNATION

This advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

The Joint Utilities respectfully request this advice letter becomes effective on March 21, 2022, which is thirty (30) days after submission.

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 the Joint Utilities at the addresses shown below on the same date it is delivered to the Commission.

For Bear Valley Electric Service, Inc.:

ATTN: Nguyen Quan

630 East Foothill Blvd.

San Dimas, CA 91773

Fax: 909-394-7427

E-mail: RegulatoryAffairs@bvesinc.com

For Liberty Utilities (CalPeco Electric) LLC:

Attn: Advice Letter Protests

933 Eloise Avenue

South Lake Tahoe, CA 96150

Fax 530-544-4811

Email: Cindy.Fisher@libertyutilities.com

For PacifiCorp:

Pooja Kishore

Regulatory Affairs Manager

PacifiCorp

February 18, 2022

825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (503) 813-7314
Email: californiadockets@pacificorp.com

For SouthwestGas Corporation:
Valerie J. Ontiveroz
Regulatory Manager/California
Email: valerie.ontiveroz@swgas.com

For Alpine Natural Gas Operating Company No. 1, LLC:
Michael Lamond
President
Post Office Box 550
Valley Springs, CA 95252
Telephone: (209) 772-3006
Email: mike@alpinenaturalgas.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: Franz Cheng, Energy Division
R. Mark Pocta, California Public Advocates Office
BVES, Liberty, PacifiCorp, Southwest Gas Corporation, and
Alpine Natural Gas Operating Company No. 1, LLC General
Order 96-B Service Lists
A.20-03-014, A.20-05-014, A.20-05-015, A.20-05-016, A.20-05-017,
and A.20-06-004 Service List

ATTACHMENT A

JOINT UTILITIES.

List of Measures, Segments and Treatment Tiers (PY 2021 – 2026)

	Alpine								BVES								Liberty								PacifiCorp								Southwest Gas								Basic SM/JJ Alignment	Plus SM/JJ Alignment	Reason for Differences																																																																																																																																																																																																																																																																																																																																																																																																																																										
Measure	Proposed Tier	Is Self Certification?	Special Segment	Climate Zone (CZ)	Single Family (SF)	Multifamily (MF)	Mobile Home (MH)	Avail. To Renters	Proposed Tier	Is Self Certification?	Special Segment	CZ	SF	MF	MH	Avail. To Renters	Proposed Tier	Is Self Certification?	Special Segment	CZ	SF	MF	MH	Avail. To Renters	Proposed Tier	Is Self Certification?	Special Segment	CZ	SF	MF	MH	Avail. To Renters	Proposed Tier	Is Self Certification?	Special Segment	CZ	SF	MF	MH	Avail. To Renters																																																																																																																																																																																																																																																																																																																																																																																																																																													
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HE Wall Furnace Early Replace	Plus	N	N/A	12	✓	N/A	N/A																			Plus	N	N/A	14,16	✓	✓	✓									✓		Gas utility measure only.																																																																																																																																																																																																																																																																																																																																																																																																																																										
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ATTACHMENT B

JOINT UTILITIES.

**List of Reporting Categories and Segments - Definitions and
Methodologies (PY 2021 - 2026)**

Reporting Categories and Segments - Definitions and Methodologies (PY2022-2026)^[1]

Segment	Consistent Across SMJUs		Not Consistent Across SMJUs
Demographic	Definition	Methodologies	
Housing Type	Single family homes, multifamily dwelling units, and mobile homes are eligible to participate in the program. Duplexes, triplexes, and fourplexes will be qualified as single family homes. Multifamily complexes are defined as those with five (5) or more attached dwelling units. Mobile homes are defined by California Department of Housing and Community Development as having “over 320 square feet of gross floor area, more than eight feet in width, and more than 40 feet in length.” A mobile home is a manufactured home regulated by the U.S. Department of Housing and Urban Development code (Sec. 3280) and built on a trailer chassis and designed for highway delivery to a permanent location, and it can be a single-, double-, or triple-wide home. (Derived from Statewide Energy Savings Assistance Program 2017-2020 Cycle Policy and Procedures (P&P) Manual p. 20)	Source from utility program database.	
Renter vs. Owner	Owner: The individual or company that has owners rights to the dwelling. Renter: The individual that pays rent for dwelling and is not a dependent of anyone in the household.	Source from utility program database.	
Previous vs. New Participant	The go back rule is eliminated pursuant to D.16-11-022 Ordering Paragraph 9 and D.18-08-020 Ordering Paragraph 4. Utilities are directed to conduct household retreatment based on household energy usage, prioritizing high energy users (D.16-11-022 COL 13). Utilities apply additional prioritization criteria within their territories consistent with guidelines in D.16-11-022. Statewide P&P Manual Section 2.7.	Source from utility program database.	
Seniors	Pub. Util. Code § 779.1(c) (Phrasing of “residential customers who are 65 years of age or older” with “dependent adults” implying senior status for prior group); Cal. Civ. Code § 1761(f) (“‘Senior citizen’ means a person who is 65 years of age or older”); Cal. Civ. Code § 2944.8 (defining senior citizen as person 65 years of age or older); Cal. Bus. & Prof. Code § 17206.1 (defining senior citizen as person 65 years of age or older).	At this time, all the utilities may not currently request, track or report this data.	PacifiCorp’s definition is based on CPUC term “elderly” at age 65 years or over. Southwest Gas, Liberty and BVES defines an elderly person who is 62 years of age or older.
Veteran	A former member of the armed forces, unless dishonorably discharged. The SMJUs do not have a standard definition for this segment.	At this time, the utilities do not currently request, track or report this data. Therefore, there is no methodology for identifying this segment.	
Hard-to-Reach	The Commission’s Energy Efficiency Policy Manual defines hard-to-reach residential customers as “those customers who do not have easy access to program information or generally do not participate in energy efficiency programs due to a language, income, housing type, geographic, or home ownership (split incentives) barrier. Derived from D.18-05-041, pp.41-42.	At this time, the utilities do not currently request, track or report this data. Therefore, there is no methodology for identifying this segment.	
Vulnerable	CPUC adopts the staff definition of communities that are the most vulnerable to climate change and call such communities “Disadvantaged Vulnerable Communities” or DVCs. As discussed in the “Median Income” Section below, we modify the staff proposal to include state median income and not area median income: A DVC for purposes of this proceeding consists of communities in the 25% highest scoring census tracts according to the most current versions of the California Communities Environmental Health Screening Tool (CalEnviroScreen), as well as all California tribal lands, census tracts that score in the highest 5% of Pollution Burden within CalEnviroScreen, but do not receive an overall CalEnviroScreen score due to unreliable public health and socioeconomic data, and census tracts with median household incomes less than 60% of state median income. Decision 20-08-046 at p.12-13 dated August 27, 2020. (Decision on Energy Utility Climate Change Vulnerability Assessments and Climate Adaptation in Disadvantaged Communities (Phase 1, Topics 4 and 5))	At this time, the utilities do not currently request, track or report this data. Therefore, there is no methodology for identifying this segment.	
Financial	Definition	Methodologies	
CARE	CARE legislation was codified in Public Utilities Code (“PUC”) Sections 739.1 and 739.2 (low income households with incomes at or below 200 percent of the federal poverty guidelines).	Source from utility program database.	
Disconnected	As approved by the CPUC for the utility specific tariffs.	Source from utility program database.	
Arrearages		Source from utility program database.	Alpine, Liberty, PacifiCorp and Southwest Gas defines arrearages as past due balance greater than 30 days. BVES defines arrearages at 45 days.
High Usage		Source from utility program database. Not applicable to all SMJUs service territories.	BVES, Liberty and PacifiCorp – Usage of at least 400% of baseline at least three times in 12-month period. D.21-06-015 and D.21-10-023 Alpine and Southwest Gas do not define or identify High Usage customers
High Energy Burden	Energy burden is the percentage of customers’ annual income that is spent on their energy bills. (2019 LINA Study at p.v – dated 12/13/2019)	At this time, the utilities do not currently track or report this data. Therefore, there is no methodology for identifying this segment.	
SEVI	The Socioeconomic Vulnerability Index (SEVI) metric represents the relative socioeconomic standing of census tracts, referred to as communities, in terms of poverty, unemployment, educational attainment, linguistic isolation, and percentage of income spent on housing. This metric therefore considers how a rate change may affect one community’s ability to pay more than another’s. Source: 2019 Annual Affordability Report p. 16	At this time, the utilities do not currently track or report this data. Therefore, there is no methodology for identifying this segment.	
Affordability Ratio	The Affordability Ratio (AR) metric quantifies the percentage of a representative household’s income that would be used to pay for an essential utility service after non-discretionary expenses such as housing and other essential utility service charges are deducted from the household’s income. Source: 2019 Annual Affordability Report p. 14	At this time, the utilities do not currently track or report this data. Therefore, there is no methodology for identifying this segment.	
Location	Definition	Methodologies	
DAC	Disadvantaged communities refers to the areas throughout California which most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, presence of hazardous wastes as well as high incidence of asthma and heart disease. One way that the state identifies these areas is by collecting and analyzing information from communities all over the state. CalEnviroScreen, an analytical tool created by the California Environmental Protection Agency (CalEPA), combines different types of census tract-specific information into a score to determine which communities are the most burdened or “disadvantaged.” Insert a city or town in the CalEnviroScreen map’s search box here to see if it is considered a disadvantaged community in this context. https://oehha.ca.gov/calenviroscreen/sb535 (Pursuant to Section 39711 of the Health and Safety Code, the California Environmental Protection Agency (CalEPA) developed a means for identifying disadvantaged communities. See D.18-05-041 p. 39.)	Not applicable to all SMJUs service territories At this time, not all SMJUs currently track or report this data. Therefore, there is no methodology for identifying this segment	BVES, Liberty and PacifiCorp do not provide electric service to Disadvantaged Communities. Alpine does not provide natural gas service to Disadvantaged Communities. Southwest Gas serves the following DACs within its Southern California service territory: Adelanto, Barstow, Calico, North Barstow, Summit and Victorville. Southwest Gas does not have DACs in its Northern California service territories
Rural	The Goldsmith definition is used to determine rural and urban eligibility and participation for ESA and CARE Programs. Rural areas are defined as all population, housing and territory not included within an urbanized area or urban cluster. Census blocks are identified as urban if they have a density of 1,000 people per square mile. These blocks are then aggregated to define urbanized areas that contain 50,000 or more people and urban clusters are areas with at least 2,500 but fewer than 50,000 people. (Reflected in Athens Research annual eligibility update filed February 12 of each year (D.21-06-015)).	At this time, the utilities do not currently track or report this data. Therefore, there is no methodology for identifying this segment.	
Tribal	The Commission’s Tribal Consultation Policy defines “California Native American tribe” as a Native American Tribe located in California that is on the contact list maintained by the Native American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004. (See Public Resources Code Section 21073.) California Native American Tribes include both federally recognized and non-federally recognized Tribes.	At this time, the utilities do not currently track or report this data. Therefore, there is no methodology for identifying this segment.	Alpine does not have Tribal land in its service area. BVES does not have any tribal lands in its service territory. Liberty and PacifiCorp provide electric service to customers residing on Tribal lands. Southwest Gas provides natural gas service to customers residing on Tribal lands.
Climate Zone	California has a diversity of climates not seen in other states, and the statewide provisions adopted into the California Energy Code accounts for these variations using a set of sixteen California Energy Commission (CEC) climate zones. Several efficiency standards, such as those for envelope and fenestration (window and door) materials, depend on the specific climate zone that the building is located in. Climate zones referenced, are developed by the CEC, and may be located and are updated regularly. (Derived from Statewide Energy Savings Assistance Program 2017-2020 Cycle P&P Manual p. 34 and p. 54)	Source from utility program database.	
CARB Community	Neighborhoods that have been identified by the California Air Resources Board (CARB) Community Air Protection Program, where they overlap with existing IOU DAC zip codes, as identified by Cal Enviro Screen 3.0 as being one of the 20% most disadvantaged census tracts in IOUs territory.	Not applicable to SMJUs service territories	BVES, Liberty and PacifiCorp do not provide electric service to customers in CARB Community. Alpine and Southwest Gas do not provide natural gas service to customers in CARB Communities.
PSPS Zone (Event)	Public Safety Power Shut-off: High Fire Threat areas where utilities may proactively cut power to electrical lines that may fail in certain weather conditions to reduce the likelihood that their infrastructure could cause or contribute to a wildfire. (D.20-05-051 De-Energization)	The ESA Program does not track or report this data.	Alpine is gas only
High Fire Threat District (also known as Wildfire Zone)	High Fire Threat District means those areas comprised of the following: (1) Zone 1 is Tier 1 of the latest version of the United States Forest Service and CAL FIRE’s joint map of Tree Mortality High Hazard Zones. (2) Zone 2 is Tier 2 (Elevated) of the CPUC Fire-Threat Map. (3) Zone 3 is Tier 3 (Extreme) of the CPUC Fire-Threat Map. The CPUC Fire-Threat Map was developed under R.15-05-006 and adopted by the CPUCs Safety and Enforcement Division in January 2018. The most recent version is located at https://ia.cpuc.ca.gov/firemap/ .	Source from utility program database.	
Health Condition	Definition	Methodologies	
Medical Baseline	Customers who are enrolled in the SMJUs Medical Baseline Allowance program. (Utility specific tariff)	Source from utility program database.	
Respiratory	The utilities do not have definition for this segment.	The utilities do not have a methodology for identifying this segment.	
Disabled	ESA customers that self identify as having a disability. (D.12-08-044) Cal. Civ. Code § 1761(g) (“Disabled person” means a person who has a physical or mental impairment that substantially limits one or more major life activities.) ESA customers that self identify as having a disability on their application.	Data is captured on ESA enrollment application	

[1] As directed in Attachment 1 of D.21-10-023, the Joint SMJUs submit the definitions for certain terms, many of which are derived from CPUC proceedings outside of this Low Income proceeding. To the extent a definition is modified pursuant to the relevant proceeding, the definitions submitted here are subject to change.

A.20-03-014, A.20-05-014, A.20-05-015, A.20-05-016, A.20-05-017, and A.20-06-004 Service List

**PROCEEDING: A2003014 - WEST COAST GAS COMPA
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PROCEEDING: A2005017 - SOWEST GAS CORPORATI
FILER: SOUTHWEST GAS CORPORATION
LIST NAME: LIST
LAST CHANGED: JANUARY 18, 2022

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PROCEEDING: A2006004 - ALPINE NATURAL GAS
FILER: ALPINE NATURAL GAS COMPANY NO.1, LLC (U909G)
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