



Bear Valley Electric Service, Inc.
P.O. Box 1547
Big Bear Lake, CA 92315-1547
A Subsidiary of American States Water Company

February 1, 2024

Mr. Simon Baker
Office of Distributed Energy Resources, Natural Gas & Retail Energy Rate
Director
California Public Utilities Commission 505
Van Ness Avenue, Room 5th Floor San
Francisco, CA 94102
EnergyDivisionCentralFiles@cpuc.ca.gov

RE: Bear Valley Electric Service (U 913-E) Fourth Annual Report on the Mobile Home Park Utility Upgrade Program

Dear Mr. Baker,
In accordance with California Public Utilities Commission Decision 20-04-004, Ordering Paragraph 10, Bear Valley Electric Service (BVES) submits its fourth annual report on the program to convert master-metered mobile home parks (MHP) to direct utility service.

In July 2022, BVES staff contacted the City of Big Bear Lake to request the conversion of the Leisure Bear MHP. In 2023, BVES had several discussions and meetings with the City of Big Bear Lake. After a careful evaluation of the MHP program, the City of Big Bear Lake decided not to file an application and is pursuing other options for improving the Leisure Bear MHP.

Attached hereto is BVES' fourth annual report showing no reporting as a result of the City of Big Bear Lake not being interested in the MHP program.

Sincerely,

/s/ Jeff Linam
Jeff Linam
Regulatory Affairs
Manager Enclosure

cc: Leslie Palmer, Safety and Enforcement Division
R.18-04-018 Service List



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BEAR VALLEY ELECTRIC SERVICE (U913 E)

FOURTH ANNUAL REPORT

MOBILE HOME PARK UTILITY CONVERSION PROGRAM

February 1, 2024

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BEAR VALLEY ELECTRIC SERVICE (U913 E) FOURTH ANNUAL REPORT MOBILE HOME PARK UTILITY CONVERSION PROGRAM

I. Introduction

In D.20-04-004, the Commission established a ten-year Mobilehome Park Utility Conversion Program (MHP Program) beginning in 2021 that primarily relies on existing pilot program requirement and features. For this MHP Program the Commission makes adjustments to expand eligibility and establishes annual target conversion rates and cost targets.

D.20-04-004, Ordering Paragraph (“OP”) #10, requires that Bear Valley Electric Service (BVES) file an annual report on the MHP Program by February 1 of each year beginning in 2021 utilizing the Revised Annual Report attached to the Decision. In the following sections, BVES provides short descriptions of the timeline and steps that have been taken as well as those that BVES plans to take. Pursuant to D.20-04-004, OP #10, BVES provides the Annual Report template in the Appendix to this report.

II. MHP Program Timeline

BVES has identified six different phases in the MHP Program timeline:

- Open Enrollment Phase;
- Application Phase;
- Engineering Design and Planning Phase;
- MHP Agreement Phase;
- Construction Period; and
- MHP Program Completion and Closure.

Open Enrollment Phase – Completed

There are seven MHPs located in BVES’ service territory. Of these seven MHPs the Commission Safety Enforcement Division (SED) prioritized four MHPs for conversion due to safety reasons in the previous MHP Pilot Program. At the end of the MHP Pilot Program in 2017, BVES had converted its largest master metered MHP to 250 single metered units. One of the MHPs on the SED priority list pulled out of the Pilot Program due to lack of permits.

For the MHP Program, BVES selected the Lakeview Pines MHP as the second MHP to be converted from a master-metered structure to individual meters. Southwest Gas (SWG) did not select the same MHP to upgrade as BVES.

Lakeview Pines MHP Selected for Conversion

| MHP | Location | # of Spaces | Utility Services to be Converted | Overlapping Electric Utility | Projected Construction Start Date |
|------------|--|--------------------|---|-------------------------------------|--|
| 1 | 39609 Big Bear Blvd, Big Bear Lake, CA 92315, San Bernardino County | 50 | Electric | BVES | Cancelled |

Application Phase – Cancelled in May 2022

On January 19, 2021, BVES contacted the Manager of Lakeview Pines MHP. The Manager provided BVES the following information:

1. There is a total of 70 lots of which there are 50 Mobile Home lots and 20 Recreational Vehicle (RV) lots.
2. There are 3 common areas.
3. All of the lots and common areas have individual electric meters maintained and owned by the property manager.
4. All the 50 mobile home lots have direct service individual gas meters owned by Southwest Gas.
5. The 20 RV lots will remain for RV use only and there are no plans to upgrade them to Mobile Home lots.

In early January 2021, BVES Engineering staff visited the Lakeview Pines MHP to evaluate the condition of the meter pedestals. BVES’ initial assessment is as follows:

1. Meter pedestals do not meet the Electric Utility Service Equipment Requirements Committee (EUSERC) standards.
2. Meter pedestal locations are not in accordance with code.
3. Most meter pedestals are broken and missing panel covers.
4. None of the meter pedestals had been inspected by BVES.

BVES's initial recommendation was to replace all of the meter pedestals and relocate them in front of each mobile home lot. This would allow easy access, minimize outages during conversion, and bring them up to code in accordance with EUSERC rating.

However, in early May 2022, after several discussion meetings with the Manager of Lakeview Pines MHP, BVES was informed that, "ownership decided to decline...the conversion program."

Following the Owner of Lakeview Pines' decision not to convert the MHP from master-meter to individual sub-meters, BVES cancelled all required conversion stages in May 2022. These stages are:

- Engineering Design and Planning Phase
- MHP Agreement
- Construction Phase
- MHP Program Completion and Closure

Leisure Bear MHP

Following the cancellation of Lakeview Pines MHP, BVES staff contacted the City of Big Bear Lake in July 2022 to request the conversion of the Leisure Bear MHP. In early 2022, the City of Big Bear Lake took over the operations of the Leisure Bear MHP and the City was also interested in being part of the MHP Program.

BVES had several discussions with the City of Big Bear Lake including a meeting with the City of Big Bear Lake and SWG in April 2023. In June 2023, BVES Engineering Staff and SWG conducted a site visit to evaluate the condition of the meter pedestals. BVES's initial recommendation was to replace all of the meter pedestals and relocate them in front of each mobile home lot. This would allow easy access, minimize outages during conversion, and bring them up to code in accordance with EUSERC rating.

After a careful evaluation of the MHP Program, in October 2023, the City of Big Bear Lake decided not to file an application and is pursuing other options for improving the Leisure Bear MHP.



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III. Challenges and Obstacles

BVES is experiencing challenges and obstacles in that Lakeview Pines MHP management does not want to conduct the conversions. The main reason is that many MHPs have a mix of mobile homes and RV spaces, including Lakeview Pines. The MHP program does not cover RV spaces and the MHPs do not want a partial conversion program. That is the main reason why Lakeview Pines MMP dropped out of the conversion program.

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.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 1, 2024, at Big Bear Lake, California.

Bear Valley Electric Service, Inc.

Paul Marconi, Digitally signed by Paul
Marconi, President

President Date: 2024.02.01

Paul Marconi

President

Bear Valley Electric Service, Inc.

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APPENDIX

**BEAR VALLEY ELECTRIC SERVICE
ANNUAL REPORT TEMPLATE**

| Annual Report Template* | | Per-year costs; not cumulative | | | |
|------------------------------|-------------|--------------------------------|------|------|------|
| Bear Valley Electric Service | Description | 2021 | 2022 | 2023 | 2024 |

| Program Participation | | | | | |
|-------------------------|---|----|----|----|--|
| CARE/FERA enrollment | Number of individuals enrolled in CARE/FERA after the conversion | 0 | 0 | 0 | |
| Medical Baseline | Number of individuals enrolled in Medical Baseline after the conversion | 0 | 0 | 0 | |
| Disadvantaged Community | Number of converted spaces within geographic zones defined by SB 535 map. | NA | NA | NA | |
| Rural Community** | Number of converted spaces within rural community | 0 | 0 | 0 | |
| Urban Community** | Number of converted spaces within urban community | NA | NA | NA | |
| Leak Survey (Optional) | Number of Leaks identified during preconstruction activity (if known) | NA | NA | NA | |

| | | | | | |
|---|--|----|----|----|--|
| Completed Spaces | Spaces converted that correspond to the project costs reported below. If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project closes. | | | | |
| Number of TTM MH and Covered Common Area Locations Converted (Gas) | | NA | NA | NA | |
| Number of TTM MH and Covered Common Area Locations Converted (Electric) | | 0 | 0 | 0 | |
| Number of BTM MH Converted Register Spaces (Gas) | | NA | NA | NA | |
| Number of BTM MH Converted Register Spaces (Electric) | | 0 | 0 | 0 | |
| Cost Information | | | | | |
| To The Meter - Capital Costs | | | | | |
| Construction Direct Costs | | | | | |
| Civil/Trenching | To the Meter Construction costs for civil related activities | 0 | 0 | 0 | |
| Electric | | 0 | 0 | 0 | |
| Gas | | 0 | 0 | 0 | |
| Gas System | | 0 | 0 | 0 | |

| | | | | | |
|--------------------------------|---|---|---|---|--|
| Labor | Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here) | 0 | 0 | 0 | |
| Material / Structures | Pipes, fittings and other necessary materials required for gas construction | 0 | 0 | 0 | |
| Electric System | | 0 | 0 | 0 | |
| Labor | Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here) | 0 | 0 | 0 | |
| Material / Structures | Cables, conduits, poles, transformers and other necessary materials for electrical construction | 0 | 0 | 0 | |
| Design/Construction Management | Cost for engineering, design and construction inspection cost | 0 | 0 | 0 | |

| | | | | | |
|---------------------------------|---|---|---|---|--|
| Other | | | | | |
| Labor (Internal) | Meter installation, gas relights, easements, environmental desktop reviews and other support organizations | 0 | 0 | 0 | |
| Other Labor (Internal)*** | | 0 | 0 | 0 | |
| Non-Labor | Permits | 0 | 0 | 0 | |
| Materials | meters, modules and regulators | 0 | 0 | 0 | |
| Program - Capital Costs | Costs that are inconsistent among the other IOUs, driven by utility specific business models or cost accounting practices. These costs should be separated out so that others do not compare costs that are not comparable with others. | 0 | 0 | 0 | |
| Project Management Costs | | 0 | 0 | 0 | |



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| | | | | | |
|---------------------------------|---|---|---|---|--|
| Project Management Office (PMO) | Program management office costs (Project Management, Program Management, schedulers, cost | 0 | 0 | 0 | |
|---------------------------------|---|---|---|---|--|

| | | | | | |
|---------------------|---|---|---|---|--|
| | analysts and field engineers) | | | | |
| Outreach | | 0 | 0 | 0 | |
| Property Tax | Property tax on capital spending not yet put into service | 0 | 0 | 0 | |
| AFUDC | AFUDC is a mechanism in which the utility is allowed to recover the financing cost of it's construction activities. AFUDC starts when the first dollar is recorded on the project and ends when HCD complete the first inspection so that the new assets are in use by the residents. | 0 | 0 | 0 | |
| Other | | | | | |
| Labor (Internal)*** | | 0 | 0 | 0 | |
| Non-Labor | Utility specific overhead driven by corporate cost model | 0 | 0 | 0 | |

| | | | | | |
|-------------------------------------|--|---|---|---|--|
| Sub-Total Capital Cost | | | | | |
| To The Meter - Expense Costs | | | | | |
| Project Management Costs | | | | | |
| Project Management Office (PMO) | Program startup cost | 0 | 0 | 0 | |
| Outreach | Outreach efforts to educate MHP Owners, residents, government and local agencies about the program | 0 | 0 | 0 | |
| Other | | | | | |
| Labor (Internal) | Program startup cost for supporting organizations | 0 | 0 | 0 | |
| Other Labor (Internal)*** | | 0 | 0 | 0 | |
| Non-Labor | Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project | 0 | 0 | 0 | |
| Sub-Total To The Meter | | | | | |
| Beyond The Meter - Capital | | | | | |
| | Pass through cost where the MHP Owner is responsible for overseeing the vendor's work and | 0 | 0 | 0 | |

| | IOU to reimburse per D.14-02-021 | | | | |
|-----------------------------------|--|----|----|----|--|
| Civil/Trenching NA | | NA | NA | NA | |
| Electric System | | 0 | 0 | 0 | |
| Labor | Labor and material for installing BTM | 0 | 0 | 0 | |
| Material / Structures | Electric infrastructure (e.g. Pedestal, foundation, meter protection, grounding rods, conduit) | 0 | 0 | 0 | |
| Gas System | | | | | |
| Labor | Labor and material for installing BTM | | | | |
| | Gas infrastructure | | | | |
| Material / Structures | (e.g. houselines, meter protection, foundation) | | | | |
| Other | BTM Permits, including HCD fees | | | | |
| Other Labor (Internal)*** | | | | | |
| Sub-Total Beyond The Meter | | | | | |
| Total TTM & BTM | | | | | |

| Rate Impact and Revenue Requirement | | | | | | | |
|---|------|------|------|------|----------------------|------|--|
| Rate Impact | 2021 | 2022 | 2023 | 2024 | Each Year Continued. | 2025 | |
| Gas | | | | | | | |
| Average Rate w/o MMBA recovery - Core | | | | | | | |
| Average Rate w/ MMBA recovery - Core | | | | | | | |
| Rate Change - Core | | | | | | | |
| % Rate Change - Core | | | | | | | |
| Average Rate w/o MMBA recovery - Non-Core | | | | | | | |
| Average Rate w/ MMBA recovery - Non-Core | | | | | | | |
| Rate Change - Non-Core | | | | | | | |
| % Rate Change - Non-Core | | | | | | | |
| Electric | | | | | | | |
| Average Rate w/o MMBA recovery - Total System | | | | | | | |
| Average Rate w/ MMBA recovery - Total System | | | | | | | |
| Rate Change - Total System | | | | | | | |
| % Rate Change - Total System | | | | | | | |

| Revenue Requirement | 2021 | 2022 | 2023 | 2024 | Each Year Continued. | 2025 | Present Value Revenue Requirement |
|----------------------------------|------|------|------|------|----------------------|------|-----------------------------------|
| Gas Revenue Requirement-TTM | | | | | | | |
| Electric Revenue Requirement-TTM | | | | | | | |
| Gas Revenue Requirement-BTM | | | | | | | |
| Electric Revenue Requirement-BTM | | | | | | | |

*An appendix can be provided to define each category if needed.

**The Census Bureau identifies two types of urban areas:

- Urbanized Areas (UAs) of 50,000 or more people;
- Urban Clusters (UCs) of at least 2,500 and less than 50,000 people.

“Rural” encompasses all population, housing, and territory not included within an urban area. The Census Bureau website is: <https://www.census.gov/geo/reference/urban-rural.html>.

***Provide as many labor cost lines with descriptions as needed to clarify types of labor included in project.