



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

February 1, 2022

Mr. Simon Baker
Interim Deputy Executive Director for Energy and Climate Policy
Executive 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) 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 second annual report on the program to convert master-metered mobile home parks (MHP) to direct utility service.

In January 2021, BVES visited the Lakeview Pines (LVP) MHP to assess the number of mobile home and recreational vehicles lots, and to evaluate the meter pedestals. Starting in March 2021, BVES and LVP had numerous email correspondence and phone calls regarding the full completion of Commission required forms. As of December 2021, BVES has not received the fully and correctly completed forms.

Attached hereto is BVES' second annual report showing the planned 2022 timetable for the conversion of LVP MHP in 2022.

Sincerely,

 /s/
Nguyen Quan
Manager Regulatory Affairs

Enclosure

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

BEAR VALLEY ELECTRIC SERVICE (U913 E)

SECOND ANNUAL REPORT

MOBILE HOME PARK UTILITY CONVERSION PROGRAM

February 1, 2022

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

I. Introduction

In D.20-04-004, the Commission establishes 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 annual report on the MHP Program by February 1 of each year beginning in 2021 and 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 due to safety reason for conversion in the previous MHP Pilot Program. At the end of the MHP Pilot Program in 2017, BVES has 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.

In the instant MHP Program, BVES has selected the Lakeview Pines (LVP) MHP as the second MHP to be converted from a master-metered structure to individual meters. Currently Southwest Gas (SWG) does not select the same MHP to upgrade as BVES

Mobile Home Park 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	8/16/2022

Application Phase – In Progress

On January 19, 2021, BVES contacted the Lakeview Pines MHP manager. 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 RV lots.
2. There are 3 common areas.
3. All of the lots and common areas have individual electric meter maintain and owned by the property manager.
4. All the 50 mobile home lots have direct service individual gas meters owned by SWG.
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 has been inspected by BVES.

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

Engineering Design and Planning Phase – In Progress

Tasks included in this phase are:

1. Contractor selected by MHP owner.
2. Preliminary design work to be completed by contractor.
3. Preliminary beyond-the-meter design work completed by contractor.
4. Meetings with MHP owner or MHP contact representative.
5. Preliminary contact with MHP residents.
6. Creation of the MHP Agreement.

Once BVES has selected a contractor for design work to the meter (TTM) work, BVES will schedule an on-site meeting with the contractor to assess the electrical system of the MHP. The assessment will focus on the access path to the lots, the location of the meters and other technical requirements necessary for upgrades. In addition, BVES will provide to the MHP manager or owner the list of contractors from which he/she can select to perform beyond-the-meter (BTM) work while the TTM work is in progress. Once the scope of work has been confirmed, estimated costs can be determined and the Mobilehome Park Utility Program Agreement (MHP Agreement) can be signed.

MHP Agreement – Not Started

The Agreement has not been signed due to delays in the signing of Commission required Form 60 and Form 61. BVES expects the Agreement to be signed this February 2022

Construction Phase – Not Started

MHP Program Completion and Closure – Not Started

BVES anticipates being able to complete the conversion for Lakeview Pines MHP by the end of 2022.

Table 1 below provides the estimated time line of the seven phases described above.

Table 1 – Estimated Time Line

LAKEVIEW PINES MOBILE HOME PARK	
PHASE	TIME LINE
Open Enrollment	February 1, 2022- April 1, 2022
MHP Application	February 15, 2022 - March 31, 2022
Engineering Design & Planning	April 1, 2022 - June 30, 2022
MHP Agreement	July 1, 2022 - August 15, 2022
Construction	August 16, 2022 - December 2022
MHP Program Completion	December 2022

Table 2 below provides the yet to be determined dates for specific activities to be performed in the implementation of the MHP Program.

Table 2 – Future Activities

Date	Audience	Events	Method
TBD	MHP Owner/Operator	General Outreach Packet	Informational Letter/Brochure
TBD	MHP Owner/Operator	Prioritization Selection Status	Informational Letter
TBD	MHP Owner/Operator	Application sent to selected MHP	Informational Letter
TBD	MHP Owner/Operator	Planning and Coordination with MHP	In-Person Meeting
TBD	MHP Owner/Operator	Site Walk-Through/Meter Spot	In-Person Meeting
TBD	MHP Owner/Operator	Agreement sent to selected MHP	Agreement Packet

III. Challenges and Obstacles

To date, except for the signature delay BVES has not experience any significant issues with implementing the MHP 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, 2022 at Big Bear Lake, California.

Bear Valley Electric Service, Inc.

Paul Marconi
President, Treasurer & Secretary
Paul.Marconi@bvesinc.com

APPENDIX

**BEAR VALLEY ELECTRIC SERVICE
ANNUAL REPORT TEMPLATE**

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

Program Participation					
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the conversion	TBD			
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion	TBD			
Disadvantaged Community	Number of converted spaces within geographic zones defined by SB 535 map.	NA			
Rural Community**(Whispering Pines) TBD	Number of converted spaces within rural community	250			
Urban Community**	Number of converted spaces within urban community	NA			
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)	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				
Number of TTM MH and Covered Common Area Locations Converted (Electric)	TBD				
Number of BTM MH Converted Register Spaces (Gas)	NA				
Number of BTM MH Converted Register Spaces (Electric)	TBD				
Cost Information					
To The Meter - Capital Costs					
Construction Direct Costs					
Civil/Trenching	To the Meter Construction costs for civil related activities	TBD			
Electric		TBD			
Gas		TBD			
Gas System		TBD			

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

Other					
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations	TBD			
Other Labor (Internal)***		TBD			
Non-Labor	Permits	TBD			
Materials	meters, modules and regulators	TBD			
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.	TBD			
Project Management Costs		TBD			
Project Management Office (PMO)	Program management office costs (Project Management, Program Management, schedulers, cost	TBD			

	analysts and field engineers)				
Outreach		TBD			
Property Tax	Property tax on capital spending not yet put into service	TBD			
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.	TBD			
Other					
Labor (Internal)***		TBD			
Non-Labor	Utility specific overhead driven by corporate cost model	TBD			
Sub-Total Capital Cost					

To The Meter - Expense Costs					
Project Management Costs					
Project Management Office (PMO)	Program startup cost	TBD			
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	TBD			
Other					
Labor (Internal)	Program startup cost for supporting organizations	TBD			
Other Labor (Internal)***		TBD			
Non-Labor	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project	TBD			
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 IOU to reimburse per D.14-02-021	TBD		

Civil/Trenching	NA				
Electric System					
Labor	Labor and material for installing BTM	TBD			
Material / Structures	Electric infrastructure (e.g. Pedestal, foundation, meter protection, grounding rods, conduit)	TBD			
Gas System					
Labor	Labor and material for installing BTM				
	Gas infrastructure (e.g. houselines, meter protection, foundation)				
Material / Structures					
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.