

Docket: A.17-06-031 et al.
Exhibit Number : _____
Commissioner : Peterman
Admin. Law Judge : Cooke, Goldberg
ORA Coordinator : Matthew Yunge
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ORA
OFFICE OF RATEPAYER ADVOCATES



**OFFICE OF RATEPAYER ADVOCATES
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**PREPARED TESTIMONY
ON
BEAR VALLEY ELECTRIC SERVICE DIVISION'S 2017
TRANSPORTATION ELECTRIFICATION PROPOSAL**

San Francisco, California
December 11, 2017

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MEMORANDUM

This direct testimony was prepared by the Office of Ratepayer Advocates (“ORA”) in the consolidated proceeding of Application (“A.”) 17-06-031 (PacifiCorp), A.17-06-033 (Liberty Utilities), and A.17-06-034 (Bear Valley Electric Service Division). As part of this docket, Bear Valley Electric Service Division (“BVES”) requests Commission approval to implement its proposed Destination Make-Ready Pilot and an experimental Electric Vehicle (“EV”) Time of Use (“TOU”) Rate Pilot pursuant to Senate Bill (“SB”) 350.¹ In this testimony, ORA presents its analysis and recommendations associated with the BVES’s requests.

Liam Weaver served as ORA’s witness and is sponsoring all sections of this testimony other than Section II(D). Nathan Chau and Benjamin Gutierrez serve as ORA’s witnesses and are responsible for Section II(D) of this testimony and the associated stipulation (Attachment 1). Their prepared qualifications and testimony are contained in this report.

ORA’s legal counsel for this proceeding is Tovah Trimming.

¹ Senate Bill SB 350 (de León, 2015), Chapter 547, Statutes of 2015.

1 **BACKGROUND**

2 In accordance with Rule 13.8 of the California Public Utilities Commission (“CPUC” or
3 “Commission”), Rules of Practice and Procedure, and the October 25, 2017 Scoping Memo and
4 Ruling of Assigned Commissioner and Administrative Law Judges (“Scoping Memo”), ORA
5 submits this intervenor testimony on the priority review project (“PRP”) and standard review
6 project (“SRP”) proposals relating to transportation electrification (“TE”) Destination
7 Make-Ready and TOU pilot projects filed by BVES in A.17-06-034.

8 BVES proposes one PRP, the Destination Make-Ready Pilot, and one SRP, an
9 experimental EV-TOU Rate Pilot. The Destination Make-Ready Pilot has a proposed budget of
10 \$607,500 and would allow BVES to administer make-ready charging infrastructure installation
11 rebates for up to 50 Level 2 (“L2”) chargers.² BVES would not own the charging stations, also
12 referred to as Electric Vehicle Supply Equipment (“EVSE”), and instead would provide rebates
13 to participating customers for costs associated with the installation of the make-ready
14 infrastructure. The make-ready infrastructure either would be installed by BVES and/or be
15 performed by third-party licensed contractors.³ The experimental EV-TOU Rate Pilot has a
16 proposed budget of \$139,000 and would allow BVES to install submeters, including additional
17 breaker panels and wiring, for existing EVSE (and those under the Destination Make-Ready
18 Pilot). In addition, this pilot applies separate TOU rates for EV charging.

19 **I. SUMMARY OF RECOMMENDATIONS**

20 ORA conducted an in-depth review and analysis of BVES’s application relating to
21 Destination Make-Ready and EV-TOU Pilot projects and provides the following
22 recommendations, summarized below:

- 23 1) The Commission should adopt ORA’s proposal to restructure BVES’s
24 Destination Make Ready Pilot as a make-ready program in line with
25 previous EV pilots approved by the Commission, eliminating the need
26 to issue rebates and treat them as regulatory assets.
27
28 2) The Commission should require BVES to establish a one-way
29 balancing account, instead of the requested two-way balancing
30 account, for its Destination Make-Ready Pilot at the authorized

² A.17-07-034, p. 3.

³ A.17-07-034, p. 15.

1 funding level. BVES should also be authorized a 10% cost
2 contingency to allow for cost uncertainties.

- 3
- 4 3) To minimize the risk of stranded assets, participants in BVES’s
5 Destination Make-Ready Pilot should be required to maintain the
6 EVSE for 10 years, a similar time period as the estimated life of the
7 EVSE.
- 8
- 9 4) The Commission should adopt the rate design recommendations made
10 in the stipulation between BVES, ORA, and Small Business Utility
11 Advocates.

12 II. DISCUSSION

13 A. The Commission should modify BVES’s Destination 14 Make-Ready Pilot from a rebate program to a make- 15 ready program.

16 For the Destination Make-Ready Rebate Pilot, BVES intends to provide rebates to cover
17 all make-ready installation costs up to \$9,250 per site to support up to 50 L2 chargers, with a
18 maximum of 5 L2 chargers at each approved location (rebates will cover up to: \$7,300 for
19 service panels, conductors, conduits and trenching; \$750 for permits; \$800 for site assessment;
20 and \$400 for compliance verification).⁴ In addition, BVES asserts that the rebates would also
21 cover part of the cost of the charging stations if this “significantly improves customer uptake and
22 is cost-effective.”⁵ BVES requests to treat the rebates as “capital additions to further incent
23 utility programs that will increase EV adoption.”⁶ BVES asserts that these incentives are
24 justified because without BVES’s involvement, the make-ready infrastructure would not be
25 installed.⁷

26 BVES’s proposed program should be modified to be a make-ready program instead of a
27 rebate program. The make-ready infrastructure, in this context, refers to the electric
28 infrastructure (including wiring, conduit, and other necessary electrical equipment) from the
29 distribution line up to but not including the charging station. Since BVES would own the
30 make-ready infrastructure and the installation work would be performed or contracted out by

⁴ A.17-06-034, pp. 3, 12. Other costs of the program include items such as evaluation, monitoring, marketing, outreach, data collection, and rebate processing. *Id.*

⁵ A.17-06-034, p. 12.

⁶ A.17-06-034, p. 36.

⁷ A.17-06-034, p. 36.

1 BVES, a rebate program in this particular scenario adds administrative burden. Specifically, in
2 BVES’s proposed rebate model, it appears that a customer would pay for the infrastructure and
3 installation costs, receive a rebate from BVES, and then reimburse BVES or its contractor. The
4 issuance of rebates to customers is unnecessary because BVES can simply include the make-
5 ready infrastructure costs in a balancing account for reimbursement at a later date.

6 In addition, rebates should not be included in ratebase but should be treated as an expense
7 for ratemaking purposes. A utility rebate is not a capital investment; therefore, rebates should
8 not receive ratebase treatment. Under a make-ready model, the make-ready infrastructure
9 constructed, owned, and operated by BVES would be classified as capital additions in ratebase,
10 thereby incentivizing the utility to invest in TE projects. The make-ready model is also
11 consistent with previous Commission decisions and Generally Accepted Accounting Principles
12 (“GAAP”).⁸ In Decision (“D.”) 16-12-065 and D.16-01-023, regarding Pacific Gas and Electric
13 Company’s (“PG&E”) and Southern California Edison Company’s (“SCE”) light-duty EV pilot
14 programs, respectively, the Commission authorized a make-ready model and determined that
15 rebates should be treated in accordance with GAAP for which costs are recovered from
16 customers in the year the expense is incurred and should not be treated as a regulatory asset in
17 ratebase.² Consistent with previous Commission decisions, ORA recommends that BVES
18 implement a make-ready model similar to those approved in D.16-12-065 and D.16-01-023, for
19 PG&E’s EV Charge Network and SCE’s Charge Ready (respectively). In keeping with these
20 decisions, BVES would install or contract out work to install the make-ready infrastructure and
21 then include the costs of these assets in ratebase as capital additions.

22 In sum, ORA’s proposed program would be carried out similarly to the program proposed
23 by BVES but would eliminate the need for BVES to reimburse itself through its own rebates and
24 then treat that rebate as an asset. Non-capital costs, such as marketing, outreach, and education
25 would still be expensed under ORA’s proposal, consistent with previous Commission decisions
26 highlighted above. BVES would still have adequate incentive to capitalize make-ready
27 infrastructure costs while minimizing impact to ratepayers and supporting transportation
28 electrification.

⁸ D.16-12-065, p. 55.

² See generally D.16-12-065; D.16-01-023.

1 **B. The Commission should require BVES to establish a one-**
2 **way balancing account.**

3 BVES proposes a two-way Transportation Electrification Pilot Program Balancing
4 Account for non-capital costs and another two-way balancing account for capital costs with an
5 allowance for funds used during construction.¹⁰ A two-way balancing account, as defined by
6 BVES in this context, would allow BVES to record actual incremental costs that may exceed the
7 approved funding amount and seek recovery through a Tier 1 advice letter.¹¹ BVES claims that
8 this is reasonable because of the uncertainty associated with the costs of its TE pilot program.¹²
9 ORA acknowledges the uncertainty in TE pilot implementation costs in BVES’s service territory
10 and that BVES is undertaking some risk that actual program costs may vary from estimated
11 costs. However, ORA opposes the use of a two-way balancing account for similar reasons that
12 BVSE cited in its Application: BVES cites the uncertainty of TE adoption in its territory, as well
13 as uncertainty about program costs.¹³

14 A one-way balancing account is more appropriate than a two-way balancing account.
15 A one-way capped balancing account, defined in this context, would prohibit BVES from
16 collecting costs from ratepayers that exceed the allotted program cost and any remaining budget
17 unused in the program would be returned to ratepayers. This would ensure prudent investment
18 of ratepayer funds on the proposed TE projects. Furthermore, one-way balancing account
19 treatment for TE projects is also consistent with the accounting treatment the Commission
20 adopted for the large IOUs in their light-duty EV charging programs¹⁴ and is the same proposed
21 cost recovery mechanism their most recent SB 350 TE applications.¹⁵ If a one-way balancing
22 account is approved, ORA supports BVES’s use of a Tier 1 advice letter filing to recover costs
23 associated with its TE proposals.

24 If the Commission grants BVES the authority to establish a one-way balancing account,
25 and BVES has not already included a cost contingency in its cost estimates, then BVES should

¹⁰ A.17-06-034. pp. 42-43; BVES Response to ORA Data Request 1, Question 2.

¹¹ A.17-06-034 pp. 43-44.

¹² BVES Response to ORA Data Request 1, Question 2.

¹³ BVES Response to ORA Data Request 1, Question 2.

¹⁴ D.16-12-065, p. 64; D.16-01-023, pp. 26-27.

¹⁵ A.17-01-021, pp. 8-9, A.17-01-022, pp. 4-5; A.17-01-020, p. 9.

1 be authorized a 10% cost contingency to account for uncertainties in specific project costs. The
2 cost contingency will provide enough flexibility so that, if installation costs exceed the estimated
3 amounts, BVES will still be able to administer the pilot program and collect enough data for a
4 potential full-scale application. A 10% contingency is reasonable and is the same contingency
5 approved by the Commission for PG&E’s light-duty EV Pilot program.¹⁶

6 **C. Participants in BVES’s Destination Make-Ready Pilot**
7 **should be required to maintain EVSE for 10 years.**

8 As a criterion for participation in the Destination Make-Ready Pilot, BVES requires site
9 hosts to maintain the EVSE for 24 months.¹⁷ To ensure long-term commitment and to align with
10 a more realistic lifetime of this equipment, ORA recommends that site hosts are required to
11 maintain the EVSE for 10 years. The useful life for EVSE is typically cited to be at least
12 10 years, according the United States Department of Energy, with the potential for systems to
13 last much longer with consistent maintenance.¹⁸ Moreover, this recommendation is consistent
14 with other EV program eligibility criteria. For example, Pacific Gas and Electric Company
15 proposed a requirement for customers to maintain the EVSE for the expected useful life of the
16 EVSE and/or EV in its Transportation Electrification application.¹⁹ BVES’s 2-year requirement
17 creates a risk of stranded assets where infrastructure is constructed for site hosts who are not
18 committed to keeping the EVSE operating for its useful life. For these reasons, a 10-year
19 commitment to maintain the EVSE is a more appropriate criterion.

20 **D. The Commission should adopt the rate design**
21 **recommendations made in the stipulation between BVES,**
22 **ORA, and Small Business Utility Advocates.**

23 Bear Valley, ORA, and Small Business Utility Advocates (“SBUA”), entered into a
24 stipulation on December 8, 2017 regarding BVES’s proposed electric vehicle time-of-use
25 (“EV TOU”) pilot program (Attachment 1). The stipulated terms reflect reasonable
26 modifications to BVES’ EV TOU pilot program. Therefore, the Commission should use the
27 stipulation as the basis for determining BVES’s EV TOU rate.

¹⁶ D.16-12-065, pp. 61, 82.

¹⁷ A.17-06-034, p. 15.

¹⁸ U.S. Dept. of Energy, COSTS ASSOCIATED WITH ELECTRIC VEHICLE SUPPLY EQUIPMENT, (Nov. 2015),
available at https://www.afdc.energy.gov/uploads/publication/evse_cost_report_2015.pdf.

¹⁹ A.17-01-022, pp. 3-10.

1 **III. CONCLUSION**

2 The foregoing reasons, the Commission should approve BVES’s Application with ORA’s
3 proposed modifications to adopt a make-ready model without a rebate structure, allow a capped
4 one-way balancing account with a 10% cost contingency (assuming no contingency has already
5 been factored into cost estimates), and require that participants commit to maintaining the EVSE
6 for 10 years. In addition, the Commission should adopt the rate design recommendations
7 included in the attached stipulation.

APPENDIX A

QUALIFICATIONS OF WITNESSES

QUALIFICATIONS AND PREPARED TESTIMONY
OF
LIAM M. WEAVER

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Q1. Please state your name, business address, and position with the California Public Utilities Commission.

A1. My name is Liam Weaver and my business address is 505 Van Ness Avenue, San Francisco, CA 94102. I am a Utilities Engineer in the Energy Safety and Infrastructure Branch of the Office of Ratepayer Advocates.

Q2. Please summarize your educational background.

A2. I graduated with a Master of Science in Engineering from the University of California, Berkeley with a concentration in Energy, Civil Infrastructure, and Climate. I received a Certificate in Engineering and Business for Sustainability and focused primarily on optimization and integration of distributed energy resources, electric vehicles and renewable resources. I also have an Honors Bachelor of Science degree in Civil & Environmental Engineering from the University of Tennessee, Knoxville, with a minor in Business Administration.

Q3. Briefly describe your professional experience.

A3. I joined ORA as a Utilities Engineer in 2017 and manage technical projects for Electric Rule 21 Interconnection and Transportation Electrification. Before joining the ORA, I spent 2 years working on climate change infrastructure resiliency research in conjunction with the Knoxville Utilities Board, Oak Ridge National Laboratory, and the US Department of Homeland Security, worked for 7 months as an energy optimization data scientist for Greensparc, Inc., and completed an internship advising the technical team for sustainable development at the New Zealand Green Building Council. My project work at UC Berkeley also collaborated with industry partners and focused on: optimization, aggregation, and integration of electric vehicle fleets to inform sustainable transportation electrification policy; optimal management and dispatch of distributed energy resource systems including Solar photovoltaic and energy storage; electric vehicle and residential demand response automation through cyber-physical systems; and machine learning applications for Smart Grid Smart City program analysis.

Q4. What is your responsibility in this proceeding?

A4. I am sponsoring this testimony on Bear Valley Electric Service's TE pilot programs.

Q5. Does this conclude your prepared testimony?

A5. Yes, it does.

1 **QUALIFICATIONS AND PREPARED TESTIMONY**
2 **OF**
3 **BENJAMIN GUTIERREZ**

4 Q1: Please state your name, business address, and position with the California Public Utilities
5 Commission.

6 A1: My name is Benjamin Gutierrez and my business address is 505 Van Ness Avenue,
7 San Francisco, CA 94102. I am a Public Utilities Regulatory Analyst in the Electricity Pricing
8 and Customer Programs Branch of the Office of Ratepayer Advocates.

9 Q2: Please summarize your educational background.

10 A2: I have a Bachelor of Arts in Environmental Science and Public Policy from Harvard
11 University, Cambridge, MA.

12 Q3: Briefly describe you professional experience.

13 A3: I have been employed by the Office of Ratepayer Advocates (“ORA”) for twenty-two
14 months. During this time, I have submitted testimony on various marginal costs issues in various
15 proceedings, such as the San Diego Gas & Electric Company’s General Rate Case (“GRC”)
16 Phase 2, Pacific Gas and Electric Company’s GRC Phase 2, participated in the design of the
17 investor-owned utilities’ Opt-In and Default Time-Of-Use (“TOU”) pilots through the TOU
18 Working Group and participated in the TOU OIR proceeding. Prior to working for ORA,
19 I worked as a Clean Energy Coordinator and Philanthropy Coordinator for nearly two years for
20 the Malaysian nonprofit organization Land Empowerment Animals People (“LEAP”). During
21 this time, I contributed research and writing on the costs and resource availabilities of renewable
22 energy and fossil fuel technologies in the Malaysian state of Sabah, among other duties.

23
24 Q4: What is your responsibility in this proceeding?

25 A4: I am sponsoring Section II(D) of this testimony regarding the modifications and stipulation
26 to Bear Valley’s rate design proposal.

27 Q5: Does this conclude your prepared testimony?

28 A5: Yes, it does.
29

1 **QUALIFICATIONS AND PREPARED TESTIMONY**
2 **OF**
3 **NATHAN CHAU**

4 Q1: Please state your name, business address, and position with the California Public Utilities
5 Commission.

6 A1: My name is Nathan Chau and my business address is 505 Van Ness Avenue, San Francisco,
7 CA 94102. I am a Public Utilities Regulatory Analyst in the Electric Pricing and Customer
8 Programs Branch of the Office of Ratepayer Advocates.

9 Q2: Please summarize your educational background.

10 A2: I attended the University of the Pacific. I graduated in 2014 with a Bachelor of Science
11 degree in applied economics. My coursework included microeconomics, finance, statistics,
12 calculus, econometrics and industrial economics which I find relevant to this proceeding.

13 Q3: Briefly describe you professional experience.

14 A3: I started working at the Commission in 2015. Since then, I have written testimony for
15 San Diego Gas & Electric Company's and Pacific Gas and Electric Company's General Rate
16 Case Phase 2 proceedings, Application ("A.") 15-04-012 and A.16-06-013, respectively on
17 marginal cost, and rate design matters. I also have written comments and testimony pertaining to
18 the Time-of-Use Order Instituting Rulemaking (R.15-12-012) and Residential Rate Reform
19 Order Instituting Rulemaking (R.12-06-013). Additionally, I have provided analytical support
20 for Southern California Edison Company's Rate Design Window Proceedings A.16-09-003 and
21 A.17-04-015.

22 Q4: What is your responsibility in this proceeding?

23 A4: I am sponsoring Section II(D) of this testimony regarding the modifications and stipulation
24 to Bear Valley's rate design proposal.

25 Q5: Does this conclude your prepared testimony?

26 A5: Yes, it does.

ATTACHMENT 1

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of PacifiCorp (U 901 E) for Approval of its 2017 Transportation Electrification Programs.

Application No. 17-06-031

Application of Liberty Utilities (CalPeco Electric) LLC (U 933 E) for Approval of its 2017 Transportation Electrification Proposals

Application No. 17-06-033

Application of Golden State Water Company on behalf of its Bear Valley Electric Service Division (U 913 E) for Approval of its 2017 Transportation Electrification Proposals.

Application No. 17-06-034

**JOINT MOTION OF BEAR VALLEY ELECTRIC SERVICE (U 913-E), A DIVISION
OF GOLDEN STATE WATER COMPANY, THE OFFICE OF RATEPAYER
ADVOCATES, AND SMALL BUSINESS UTILITY ADVOCATES TO ENTER A JOINT
STIPULATION INTO THE RECORD AND FOR AN EXPEDITED RULING**

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Attorneys for Bear Valley Electric Service

December 8, 2017

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of PacifiCorp (U 901 E) for Approval of its 2017 Transportation Electrification Programs.	Application No. 17-06-031
Application of Liberty Utilities (CalPeco Electric) LLC (U 933 E) for Approval of its 2017 Transportation Electrification Proposals	Application No. 17-06-033
Application of Golden State Water Company on behalf of its Bear Valley Electric Service Division (U 913 E) for Approval of its 2017 Transportation Electrification Proposals.	Application No. 17-06-034

JOINT MOTION OF BEAR VALLEY ELECTRIC SERVICE (U 913-E), A DIVISION OF GOLDEN STATE WATER COMPANY, THE OFFICE OF RATEPAYER ADVOCATES, AND SMALL BUSINESS UTILITY ADVOCATES TO ENTER A JOINT STIPULATION INTO THE RECORD AND FOR AN EXPEDITED RULING

In accordance with Article 11 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Bear Valley Electric Service (“BVES”), a division of Golden State Water Company, the Office of Ratepayer Advocates (“ORA”), and Small Business Utility Advocates (“SBUA”) (collectively the “Moving Parties”), hereby move to enter the December 8, 2017 Stipulation between Bear Valley Electric Service (U 913-E), a division of Golden State Water Company, Office of Ratepayer Advocates, and Small Business Utility Advocates Regarding Electric Vehicle Time-of-Use Rates and Time-of-Use Periods for the Proposed Electric Vehicle Time-of-Use Pilot Program (“Stipulation”) into the record in the instant consolidated proceedings, A.17-06-031 et al.¹ The Stipulation is attached to this motion

¹ In accordance with Rule 1.8(d), BVES has been authorized to submit this joint motion on behalf of ORA, and SBUA, and others.

as Appendix A. BVES reached out to all other parties in the proceeding and received no objections or concerns regarding this motion or the Stipulation.² Accordingly, the Moving Parties also request that the response deadline to this motion be shortened so an expedited ruling on this motion can be issued. This will help parties narrow and tailor discussions in written testimony and will help to streamline and advance the proceeding expeditiously.

BVES hereby requests the Commission to take the following actions:

- to enter the December 8, 2017 Stipulation between Bear Valley Electric Service (U 913-E), a division of Golden State Water Company, Office of Ratepayer Advocates, and Small Business Utility Advocates Regarding Electric Vehicle Time-of-Use Rates and Time-of-Use Periods for the Proposed Electric Vehicle Time-of-Use Pilot Program into the record in this proceeding; and
- to shorten the time for responses to this motion to 3 days from the date of this motion.

Dated: December 8, 2017

Respectfully submitted,

/s/

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Attorney for Bear Valley Electric Service

² On December 6, 2017, BVES sent an email to GreenLots, Southern California Edison Company (“SCE”), and San Diego Gas & Electric Company (“SDG&E”) (the other active parties to A.17-06-031 and related, consolidated proceedings) notifying them of the intention to submit the Stipulation. GreenLots and SCE notified BVES that they do not oppose the Stipulation. SDG&E had not responded to BVES’ email at the time of this filing. (It should also be noted that ChargePoint, Inc., the other party in this proceeding, informed BVES that it will no longer be actively participating in the proceeding.)

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of PacifiCorp (U 901 E) for Approval of its 2017 Transportation Electrification Programs.	Application No. 17-06-031
Application of Liberty Utilities (CalPeco Electric) LLC (U 933 E) for Approval of its 2017 Transportation Electrification Proposals	Application No. 17-06-033
Application of Golden State Water Company on behalf of its Bear Valley Electric Service Division (U 913 E) for Approval of its 2017 Transportation Electrification Proposals.	Application No. 17-06-034

[PROPOSED] RULING

On December 8, 2017, Bear Valley Electric Service (“BVES”), a division of Golden State Water Company, the Office of Ratepayer Advocates (“ORA”), and Small Business Utility Advocates (“SBUA”) (collectively the “Moving Parties”), filed a motion (“Joint Motion”) to enter the December 8, 2017 Stipulation between Bear Valley Electric Service (U 913-E), a division of Golden State Water Company, Office of Ratepayer Advocates, and Small Business Utility Advocates Regarding Electric Vehicle Time-of-Use Rates and Time-of-Use Periods for the Proposed Electric Vehicle Time-of-Use Pilot Program (“Stipulation”) into the record in the instant consolidated proceedings.

As described by the Moving Parties in their Joint Motion, the Stipulation, if accepted into the record, will help parties narrow and tailor discussions in written testimony and will help to streamline and advance the proceeding expeditiously.

The Moving Parties also request an expedited response time to their Joint Motion. The Moving Parties state that no other parties to this proceeding object to the Joint Motion or take issue with the Stipulation.

IT IS RULED that:

1. The Joint Motion Of Bear Valley Electric Service (U 913-E), A Division Of Golden State Water Company, The Office Of Ratepayer Advocates, Small Business Utility Advocates To Enter A Joint Stipulation Into The Record And For An Expedited Ruling is granted.
 - a. The Stipulation is entered into the record of this proceeding.
 - b. Responses to the Joint Motion shall be filed within 3 days of the date of the Joint Motion.

Dated _____, 2017 at San Francisco, California

Administrative Law Judge

APPENDIX A

**STIPULATION BETWEEN BEAR VALLEY ELECTRIC SERVICE (U 913-E), A
DIVISION OF GOLDEN STATE WATER COMPANY, OFFICE OF RATEPAYER
ADVOCATES, AND SMALL BUSINESS UTILITY ADVOCATES REGARDING
ELECTRIC VEHICLE TIME-OF-USE RATES AND TIME-OF-USE PERIODS FOR
THE PROPOSED ELECTRIC VEHICLE TIME-OF-USE PILOT PROGRAM**

STIPULATION BETWEEN BEAR VALLEY ELECTRIC SERVICE (U 913-E), A DIVISION OF GOLDEN STATE WATER COMPANY, OFFICE OF RATEPAYER ADVOCATES, AND SMALL BUSINESS UTILITY ADVOCATES REGARDING ELECTRIC VEHICLE TIME-OF-USE RATES AND TIME-OF-USE PERIODS FOR THE PROPOSED ELECTRIC VEHICLE TIME-OF-USE PILOT PROGRAM

Bear Valley Electric Service (“BVES”), a division of Golden State Water Company, the Office of Ratepayer Advocates, and Small Business Utility Advocates (collectively the “Parties”) stipulate that BVES’ proposed electric vehicle time-of-use (“EV TOU”) pilot program should utilize the EV TOU rates and EV TOU periods specified below. The stipulated terms reflect reasonable modifications to BVES’ EV TOU pilot program proposed in the June 30, 2017 Application of Golden State Water Company on Behalf of its Bear Valley Electric Service Division (U 913-E) for Approval of its 2017 Transportation Electrification Proposals (“Application”).

I. EV TOU Rates

A. Non-Coincident Demand Charges

Parties agree that non-coincident demand charges should only apply to commercial electric vehicle (“EV”) accounts that exceed 50 kilowatts (“kW”) in demand.

B. New EV TOU Rates

Parties agree that the following rates should be used for the EV TOU program:

Proposed TOU Period	Proposed TOU Rate		
	TOU-EV-1	TOU-EV-2	TOU-EV-3
Summer			
On-peak	\$0.18149	\$0.18149	\$0.18149
Off-peak	\$0.13612	\$0.13612	\$0.13612
Super Off-peak	\$0.09074	\$0.09074	\$0.09074

Proposed TOU Period	Proposed TOU Rate		
Winter			
On-peak	\$0.31446	\$0.31446	\$0.31446
Off-peak	\$0.12704	\$0.12704	\$0.12704
Super Off-peak	\$0.09074	\$0.09074	\$0.09074

II. EV TOU Periods

Parties agree that the following EV TOU periods should be utilized:

Proposed TOU Period	Start	End
Summer	1-May	31-Oct
On-peak	4:00 PM	10:00 PM
Off-peak	10:00 PM	9:00 AM
Super Off-peak	9:00 AM	4:00 PM
Winter	1-Nov	30-Apr
On-peak	5:00 PM	11:00 PM
Off-peak	11:00 PM	9:00 AM
Super Off-peak	9:00 AM	5:00 PM

III. Limitations

The Parties agree that this stipulation applies only to the Commission's consideration of BVES' proposed EV TOU pilot proposal in its Application. This stipulation does not bind or limit any of the Parties from presenting different proposals or taking different positions on issues related to the EV TOU pilot proposal that may be considered elsewhere.

Dated: December 8, 2017

/s/ Jedediah J. Gibson

Jedediah J. Gibson
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