

DATA REQUEST RESPONSE
Bear Valley Electric Service, Inc.

Response provided by:	Paul Marconi
Title:	President, Treasurer & Secretary
Data Request Number:	No. CalAdvocates-BVES-2022 WMP-12
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DATA REQUESTS

The following questions relate to BVES’s Revised 2022 WMP, dated August 29, 2022.

Question 1

On July 15, 2022, Energy Safety served the Independent Evaluator Annual Report on Compliance, prepared by Sargent & Lundy. Page 14 of this report states, “The grid hardening initiative for the covered conductor installation for the Radford 34.5-kV line was not completed in 2020 or 2021 due to delays from the U.S. Forest Service (USFS) in receiving the appropriate permitting.”

- a) Please state the current status of the “appropriate permitting” discussed above.**

- b) When does BVES expect to receive the appropriate permitting from the U.S. Forest Service referenced above?**

- c) When does BVES currently expect to begin construction on the Radford line covered conductor project?**

BVES Response

Construction work on the Radford Line Replacement Project, which replaces bare wire with covered conductor and wood poles with fire resistant poles in the High Fire Threat District Tier 3, will be delayed until April/May 2023 (previously BVES had hoped to start construction in June 2022 at the latest). The delay is due to BVES not receiving approval on the permit to construct by the United States Forest Service (“USFS”) in time to start and complete construction before the winter weather season in 2022. BVES has been working closely with the USFS and has made significant progress in satisfying the USFS permitting requirements. BVES believes it is on track to obtain the permit according to the following timeline of major permitting milestones:

- BVES’s environmental contractor responds to USFS additional questions (6 total) regarding the BVES permit request. *Step completed.*
- Receive approval from USFS to conduct cultural survey. *Step completed.*

- BVES’s environmental contractor conducts cultural survey and submits report for NEPA-CE and CEQA categorical exemption to USFS. The cultural survey was started on September 2, 2022 and was scheduled to be completed on September 6, 2022. However, the Radford Line is in close proximity to the Radford Fire, an active wildfire and the area is no longer accessible. BVES will complete the survey as soon as there is safe access to the area.
- Once the USFS reviews the cultural survey, NEPA-CE and CEQA documents, and submits permit package to State Historic Preservation Officer (SHPO). BVES anticipates the SHPO process will take one month.
- Following the SHPO review, the USFS will issue a public notice. BVES anticipates the public notice will take one month.
- Following the public notice, the USFS will issue an approved permit. BVES anticipates the approved permit will take one month.
- If there are not significant access delays from the Radford Fire, BVES anticipates the approved permit will be issued in late December 2022 or January 2023.

Based on this timeline, BVES anticipates commencing the project in April/May 2023 depending on snow pack and complete the project by October 2023.

Question 2

Page 126 of BVES’s Revised 2022 WMP states, “In sequencing projects, the focus is risk reduction. BVES prioritizes and plans work based upon the highest relative risk areas as determined in the Fire Safety Matrix model described in Section 4.2 of this WMP and the Risk Maps developed by Reax Engineering describe in Section 4.2 of this WMP.”

However, the Fire Safety Matrix and the risk maps developed by Reax Engineering appear to report different levels of risk for a number of locations.² (footnote :² See *Comments of the Public Advocate’s Office on the 2022 Wildfire Mitigation Plan Updates of the Small Investor-Owned Utilities*, pp. 11-16, June 20, 2022.

a) Please describe the steps BVES plans to take prior to filing its 2023 WMP to align the two risk estimates discussed above.

b) In locations where the Fire Safety Matrix and the risk maps developed by Reax Engineering disagree, how does BVES determine the “highest relative risk areas” as discussed in its Revised 2022 WMP?

BVES Response

BVES is in the process of developing risk scoring based on the heat map values for each circuit and applying the score to each circuit. Additionally, BVES is using both the fire safety matrix and the Reax heat maps to determine relative risk level.

It should be noted that Bear Valley’s entire 32 square mile service area is “high risk”. The service area is considered “Very Dry” or “Dry” per the National Fire Danger Rating System

(NFDRS) over 75 percent of the time. The service area terrain is characterized with a high density of vegetation – trees and shrubs. The CPUC Fire-Threat Map Adopted January 19, 2018, designated Bear Valley’s service area as being in the High Fire-Threat District (HFTD) with approximately 90% in Tier 2 (elevated risk) and the remaining 10% in Tier 3 (extreme risk) areas. The Cal Fire California Fire Hazard Severity Zone Map Update Project rates Bear Valley’s service area as “Very High Fire Hazard Severity Zone”. While one can rank the relative risk of BVES’s facilities within the service area, it should be understood that all of BVES’s service area is high risk. In such a small service area, an ignition anywhere can produce embers that the wind can carry and cause a wildfire.

Question 3

Page 196 of BVES’s Revised 2022 WMP states, with regard to initiative 7.3.4.1 *Detailed inspections of distribution electric lines and equipment*, “Finally, the results of Detailed Inspections are cross checked against other asset inspections to evaluate the quality and effectiveness of each inspection type.”

a) How does BVES document the cross-checks described above?

b) Please provide all records of the cross-checks for detailed inspections described above performed between January 1, 2022 and September 1, 2022.

BVES Response

The Wildfire Mitigation and Reliability Engineer manages inspection programs and performs the cross checks as part of his reviews of the inspections. The actual cross checks are not formally documented (nor are they required to be documented). The results of cross checks are discussed at internal Field Operations and Engineering & Planning weekly production meetings. There are no cross check records to be provided (nor is there a requirement for BVES to collect and maintain such documentation).

Question 4

Page 212 of BVES’s Revised 2022 WMP states, with regard to initiative 7.3.4.14 *Quality assurance / quality control of inspections*, “This initiative includes the identification and actionable outcomes of deficiencies and inspection protocols executed in the field. This will support improvement of training and applying lessons learned from third party evaluations and inspections.”

a) Please describe how BVES documents lessons learned from its asset inspection quality assurance/quality control activities.

b) Please provide a list of all lessons learned from asset inspection quality assurance/quality control activities performed from January 1, 2021 to September 1, 2022.

c) Please describe any improvements BVES has made to training as a result of asset inspection quality assurance/quality control activities performed from January 1, 2021 to September 1, 2022.

d) Please describe any improvements BVES plans to make to training as a result of asset inspection quality assurance/quality control activities performed from January 1, 2021 to September 1, 2022.

BVES Response

BVES inspector conducts asset inspections on third party construction work. The only item of concern identified from January 1, 2021 to September 1, 2022 was regarding correct installation of raptor protection. BVES inspector worked closely with third party foreman and has resolve this concern. This item did not rise to the level of “lessons learned.”

BVES has improved the record tracking process for asset inspection quality assurance/quality control activities. These records are now more readily available to BVES personnel. BVES is currently updating the BVES Asset & Inspection Quality Management Plan and additional training will take place when the plan is finalized.

Question 5

Please answer the following regarding BVES’s detailed asset inspection quality assurance/quality control activities. For the purpose of this question, “inspector” refers to any individual who performs detailed asset inspection work for BVES, including BVES employees and contractors.

a) How does BVES determine that its inspectors completed detailed asset inspections per BVES’s current processes and procedures?

b) How does BVES determine that its inspectors appropriately marked the priority of issues found during detailed asset inspections in accordance with GO 95 Rule 18?

c) How does BVES determine if an inspector is underperforming with respect to the quality or accuracy of detailed asset inspections?

d) If an inspector is found to be underperforming, what actions does BVES take to improve the quality of detailed asset inspections performed by that inspector?

e) Please provide records of any quality control activities performed to validate the quality of detailed asset inspections performed between January 1, 2021 to September 1, 2022.

f) Please provide records of any quality control activities performed to validate the performance of inspectors who performed detailed asset inspections between January 1, 2021 to September 1, 2022.

BVES Response

BVES only has one Field Inspector who performs the Detailed Inspections. The Field Inspector reviews his work with the Field Operations Supervisor and documents the results of his inspections, which are reviewed by the Wildfire Mitigation and Reliability Engineer. The results of inspection findings, including priority marking, are reviewed by Engineering & Planning. The Field Operations Supervisor and the Wildfire Mitigation and Reliability Engineer review the Field Inspector's work. Additionally, cross checks between the various inspections are used to determine potential quality issues. If an inspector underperforms, the inspector would be trained on the specific issues and would be monitored to ensure the training was effective. The actual quality control activities are not formally documented (nor is there a requirement to do so). The results of quality control are discussed at weekly Field Operations and Engineering & Planning production meetings.

Question 6

Please answer the following regarding BVES's patrol asset inspection quality assurance/quality control activities. For the purpose of this question, "inspector" refers to any individual who performs patrol asset inspection work for BVES, including BVES employees and contractors.

- a) How does BVES determine that its inspectors completed patrol asset inspections per BVES's current processes and procedures?**

- b) How does BVES determine that its inspectors appropriately marked the priority of issues found during patrol asset inspections in accordance with GO 95 Rule 18?**
- c) How does BVES determine if an inspector is underperforming with respect to the quality or accuracy of patrol asset inspections?**

- d) If an inspector is found to be underperforming, what actions does BVES take to improve the quality of patrol asset inspections performed by that inspector?**

- e) Please provide records of any quality control activities performed to validate the quality of patrol asset inspections performed between January 1, 2021 to September 1, 2022.**

- f) Please provide records of any quality control activities performed to validate the performance of inspectors who performed patrol asset inspections between January 1, 2021 to September 1, 2022.**

BVES Response

BVES only has one Field Inspector who performs the Patrol Inspections. The Field Inspector reviews his work with the Field Operations Supervisor and documents the results of his inspections, which are reviewed by the Wildfire Mitigation and Reliability Engineer. The results of inspection findings, including priority marking, are reviewed by Engineering & Planning. The Field Operations Supervisor and the Wildfire Mitigation and Reliability Engineer review the Field Inspector's work. Additionally, cross checks between the various inspections are used to determine potential quality issues. If an inspector underperforms, the inspector would be trained

on the specific issues and would be monitored to ensure the training was effective. The actual quality control activities are not formally documented (nor is there a requirement to do so). The results of quality control are discussed at internal Field Operations and Engineering & Planning weekly production meetings.

Question 7

Please answer the following regarding BVES’s vegetation inspection quality assurance/quality control activities. For the purpose of this question, “inspector” refers to any individual who performs vegetation inspection work for BVES, including BVES employees and contractors.

- a) How does BVES determine that its inspectors completed vegetation inspections per BVES’s current processes and procedures?**

- b) How does BVES determine that its inspectors appropriately marked the priority of issues found during vegetation inspections in accordance with GO 95 Rule 18?**

- c) How does BVES determine if an inspector is underperforming with respect to the quality or accuracy of vegetation inspections?**

- d) If an inspector is found to be underperforming, what actions does BVES take to improve the quality of vegetation inspections performed by that inspector?**

- e) Please provide records of any quality control activities performed to validate the quality of vegetation inspections performed between January 1, 2021 to September 1, 2022.**

- f) Please provide records of any quality control activities performed to validate the performance of inspectors who performed vegetation inspections between January 1, 2021 to September 1, 2022.**

BVES Response

The Wildfire Mitigation and Reliability Engineer reviews all vegetation QA/QC reports. Once all the reports are reviewed, any possible issues found will then be marked with a priority. The Wildfire Mitigation and Reliability Engineer reviews the inspectors work to ensure it is up to BVES standards. If an inspector underperforms, the inspector would be trained on the specific issues and would be monitored to ensure the training was effective.

Question 8

Table 7.3-4 on pages 214-215 of BVES’s Revised 2022 WMP (“this table”) lists quality control checks performed in 2021.

- a) Please list all wildfire mitigation activities covered by the quality checks in this table.**

b) Please provide a list of all quality control issues identified as a result of the quality control checks in this table.

c) For each issue listed in part (b), please explain the actions BVES has taken to resolve these issues.

BVES Response

Table 7.3-4 on pages 214-215 is for the BVES Covered Conductor program. Throughout the QA/QC of this program the only item identified of concern from January 1, 2021 to September 1, 2022 was regarding raptor protection installation. BVES inspector worked closely with third party foreman and has resolved this concern. This item did not rise to the level of “lessons learned.”

Question 9

Page 224 of BVES’s Revised 2022 WMP states, with regard to initiative 7.3.5.5 *Fuel management (including all wood management) and reduction of “slash” from vegetation management activities*, “BVES collaborates with the US Forest Service to remove trees near lines and removes the slash as agreed upon by the local US Forest Ranger.”

a) Please describe the nature of the collaboration described above.

b) Please describe how BVES removes slash as a result of its collaboration with the US Forest Service, as described above.

BVES Response

When BVES finds a tree that needs to be trimmed or removed the Wildfire Mitigation and Reliability Engineer contacts the local Forestry Technician. The Forestry Technician is provided with the location and the reason for removal. Depending on the type of work that will be conducted, the Forestry Technician will provide instructions on what is to be done with the slash. Typically, the local USFS requires all slash from trimmings be chipped and hauled off site, but the truck of the trees be left on USFS land.

Question 10

Page 225 of BVES’s Revised 2022 WMP states, with regard to initiative 7.3.5.5 *Fuel management (including all wood management) and reduction of “slash” from vegetation management activities*, “BVES established conditions with its vegetation contractor requiring the contractor to remove all slash as it progresses along the vegetation clearance cycle schedule and as it clears areas in response to inspection findings.”

a) How does BVES verify that the vegetation contractor has appropriately removed all slash?

b) If BVES determines that the vegetation contractor has not appropriately removed all slash, what actions does BVES take to remediate the issue?

c) Please provide documentation of any quality checks BVES has performed with respect to fuel management and slash reduction activities performed by the vegetation contractor between January 1, 2022 and September 1, 2022.

BVES Response

BVES verifies the vegetation contractor's performance, which includes slash removal, by performing routine Quality Checks of the vegetation contractor's work. Furthermore, BVES staff responsible for managing vegetation clearance activities routinely go out in the field to observe vegetation work being performed. BVES's service area is very small (32 square miles) and the community is very small (permanent resident population is approximately 22,000). BVES has not received any complaints regarding failure to remove slash from the Fire Department, City and County Code Enforcement, Sheriffs, and other community organizations.

If vegetation contractor were to fail to remove slash, BVES would bring it up immediately with the contractor and continue to discuss it at the weekly meeting with the vegetation contractor. If the vegetation contractor continued to fail to remove slash, BVES would provide written notice to the vegetation contractor that they are in violation of the terms of the contract and would likely suspend paying invoices until the situation was appropriately resolved.

BVES has performed 75 vegetation QCs during the period of January 1, 2022 to September 1, 2022. Attached file "2022 Vegetation QA.QC" provides a list of VM QCs performed.

Question 11

Table 7.3-9 on pages 262-263 of BVES's Revised 2022 WMP lists the data BVES collects, how it is currently stored, and the next steps BVES plans to take to improve its data management. The "Planned Next Steps" column is blank for several data types. For each line item in Table 7.3-9 that has a blank cell in the "Planned Next Steps" column, please do one of the following:

a) Describe BVES's planned improvements to data management with regard to this line item, OR

b) Explain why BVES does not currently plan improvements to data management with regard to this line item.

BVES Response

BVES has not determined its intended "Planned Next Steps" yet for some data sets; therefore, these entries in the table are blank. As BVES develops its intended next steps, the table will be updated. Implementing data management processes and databases can be very costly and consume many labor hours; therefore, it is imperative that the data management plans be well thought out before committing resources to improving the data sets

Question 12

Page 289 of BVES's Revised 2022 WMP states, with regard to initiative 7.3.10.4 *Forest service and fuel reduction cooperation and joint roadmap*, that BVES is considering a future initiative in which it will “[Work] with a local charity organization that collects and distributes firewood to low-income members of the community. BVES will work with its vegetation contractor to partner with the charity organization and supply wood (for firewood) to the charity.”

Please provide the name of the local charity organization described above.

BVES Response

The charity organization are volunteers from the Big Bear Sheriff's Department.

Question 13

Page 272 of BVES's Revised 2022 WMP states, with regard to initiative 7.3.9.1 *Adequate and trained workforce for service restoration* (“this initiative”), “BVES conducts training and at least once per year conducts an exercise to practice service restoration command and control and field activities.”

- a) **Please provide records from 2021 and 2022 of the training BVES conducted for this initiative.**

- b) **Please provide documentation of the exercises BVES performed in 2021 and 2022 associated with this initiative.**

- c) **Please provide sample training materials from the trainings BVES conducts for this initiative.**

- d) **Please provide sample exercise material related to the exercises BVES performs for this initiative.**

BVES Response

BVES conducted its annual table-top exercise on June 26, 2021. In addition, BVES held a table-top exercise on April 14, 2022 and a functional exercise on June 21, 2022, respectively. Corresponding records of the training are attached as Q13 2021 BVES PSPS drill 062121Minutes.docx, Q14 2022 BVES Script-GO-166-PSPS.docx and Q14 2022 BVES Functional Exercise 2022 Scenario 062122.docx. In addition, sample training materials is attached as Q13 2021 BVES Inc PSPS Procedures Rev 1.pdf.

Question 14

Page 313 of BVES’s Revised 2022 WMP states, “BVES also held a tabletop exercise of PSPS activation ahead of June 1st. Lessons learned following that exercise include the need to continue improvement of coordinated communication with external parties, increase exercise complexity, provide additional background training for certain roles, and prepare for more in-person and remote work emergencies.”

a) Please provide documentation of the tabletop exercise of PSPS activation held in 2022, described above.

b) Did Southern California Edison Company (SCE) participate in the tabletop exercise of PSPS activation held in 2022, described above?

c) Please list each organization or agency that participated in the aforementioned tabletop exercise.

d) For each of the lessons learned mentioned in the quote above, please state the actions BVES has taken to incorporate these lessons into its PSPS protocols. Include the dates these actions were taken.

e) For each of the lessons learned mentioned in the quote above, please state the actions BVES plans to take to incorporate these lessons into its PSPS protocols. Include the estimated date by which these actions will be taken.

BVES Response

The corresponding documentation of the 2022 table-top exercise is attached. (Q14 2022 BVES Script-GO-166-PSPS.docx) Although SCE is not directly affected by a BVES PSPS, SCE did participate in the 2022 exercises. Due to certain limitations inherent in Zoom, BVES estimates approximately 50 people attended the table-top exercise and approximately 40 people attended the functional exercise in 2022. Attached is the PSPS participants list for each exercise (Q14 2022 BVES 2022 Annual PSPS Exercise 4-14-2022 1PM participants.docx and Q14 2022 BVES Functional PSPS Exercise June 21 2022 (attendees list).docx.

In 2022, BVES hosted two quarterly PSPS meetings with external stakeholders to assure PSPS readiness, tested its PSPS contact lists before each exercise and once again in August of 2022, and continues to train its employees as part of the annual PSPS exercises. BVES updates its PSPS procedures annually and incorporates new protocols and lessons-learned from the previous PSPS cycle (Q13 2021 BVES PSPS Exercise June 21 Lessons Learned.docx). Although BVES has never had a PSPS event in its service territory, it continues to prepare for power interruptions and emergencies in general.

END OF REQUEST