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Via Electronic Mail

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Subject: Response by Bear Valley Electric Service, Inc. to the Public Advocates office at the California Public Utilities Commission and the Green Power Institute comments on Bear Valley's Revised 2022 Wildfire Mitigation Plan

Docket: 2022-WMPs

Dear Ms. Thomas Jacobs:

Pursuant to the Office of Energy Infrastructure Safety ("Energy Safety") 2022 Wildfire Mitigation Plan Guidelines of December 15, 2021, Bear Valley Electric Service, Inc. ("BVES" or "Bear Valley") submits its responses to the comments made by the Public Advocates Office ("Cal Advocates") and Green Power Institute ("GPI") regarding Bear Valley's 2022 Wildfire Mitigation Plan Update Revision ("WMP" or "Plan").

The Comments alleged significant deficiencies and claimed BVES failed to reasonably address the issues presented in Energy Safety's July 22, 2022 Revision Notice ("Revision Notice") for BVES's 2022 Wildfire Mitigation Plan Update. The enclosed reply refutes these claims while offering additional clarification on some topics. In sum, BVES believes it has reasonably addressed all issues in the Revision Notice.

In order for the commenters to better understand the nature and condition of the BVES service territory and the inherent risks presented, BVES extends an open invitation to Cal Advocates and other commenters to visit Big Bear Lake to better understand the BVES service area, our wildfire mitigation efforts, and the constraints BVES faces.

I. Comments and Responses Should Be Viewed in Proper Context

Before specifically addressing the most recent Comments regarding Bear Valley's Revised 2022 Wildfire Mitigation Plan, BVES believes some context is warranted to properly and fairly assess the concerns expressed in the Comments, as well as Bear Valley's responses.

Bear Valley is the smallest electric investor-owned utility ("IOU") in California, with the smallest customer base and system revenues. It has the smallest executive staff of any California electric IOU, with a total employee count of only 48 employees. Virtually all of Bear Valley's staff live with their families in the BVES service territory. The threat and impact of a BVES-caused wildfire threatens the very lives and families of virtually every executive and employee of BVES. To suggest or imply that BVES management and employees are intentionally refusing to comply with their wildfire risk responsibilities or do not take very seriously their responsibility to mitigate wildfire risks defies logic. More importantly, it is simply not true.

BVES continually strives to maximize its limited staff and resources to implement, as quickly as practical, the most cost-effective wildfire risk mitigation measures available. That is not to say that BVES has been perfect, or it could not do better in these endeavors, but it is undeniable that BVES has measurably reduced the risks of igniting wildfires in its service territory.

Some of the more significant risk mitigation and safety measures, include the replacement of all expulsion (conventional) fuses in its system; the installation of 20 weather stations; hardening of all primary evacuation routes out of the BVES service territory; the enhancement of equipment inspections (LiDAR, UAV); and the addition of a contract forester. In addition, BVES is continuing to implement other risk mitigation measures, including the installation of covered conductor (30.2 circuit miles of covered wire installed to date); the implementation of pole loading assessments (3,439 pole assessments leading to 1,238 pole placements or remediations); and the removal of tree attachments (597 out of 1,207 tree attachments removed). These are real-world, concrete measures which BVES has achieved, or continues to implement, to improve safety and demonstrably reduce the risks that BVES equipment will ignite a wildfire that would devastate its small community.

BVES firmly believes that the measures it has taken, and continues to take, along with its dedicated staff who live in the BVES service territory, substantially contribute to the fact that BVES equipment has not caused a wildfire. And BVES intends to continue its efforts to reduce the risks of wildfire in the most cost-effective and practical manner possible, given its limited customer-base, staff, and financial resources.

BVES does not mean to suggest that simply because it is small, with limited resources, that it should be allowed to intentionally ignore its statutory and regulatory requirements to mitigate wildfire risks. If BVES did act in that manner, it should be held accountable. But it did not. And it should not be penalized, as some would suggest, simply because it was unable to develop and provide detailed written plans and procedures similar to those provided by the large IOUs. What

makes practical sense and is cost-effective for large IOUs does not always make practical sense and is cost-effective for the smallest electric IOU in California.¹

BVES believes that the commenters are geared to developing criteria that applies to the WMPs of the large IOUs. That makes logical sense in that the large IOUs, due to their vast and diverse service territories and enormous amounts of facilities, pose the greatest threats to cause wildfires. However, applying those same criteria in reviewing the WMP of the smallest IOU ignores the stark differences in size of service territory, amounts of facilities, resources, environment, and customer base when compared to the large IOUs. It is simply a case of apples-to-oranges comparison. BVES does not challenge the commenters' motivation in seeking to have BVES mitigate the risks of causing a wildfire. BVES shares that objective. However, with its limited resources, BVES believes that its highest priority is to continue to implement cost-effective programs that actually mitigate wildfire risks.

With this context, BVES provides responses below to a number of concerns raised by commenters.

II. Introduction – BVES Addressed All Issues in the Revision Notice

BVES believes it reasonably responded to all Revision Notice issues in its *Wildfire Mitigation Plan – 2022 Revision 1* (“Revised WMP”). BVES views Cal Advocates' concerns as misguided and without substantial support and context to claim that BVES has failed to “reasonably address all critical issues”² and that such failures “raise serious concerns about the utility’s ability to develop and implement an effective wildfire mitigation plan.”³ BVES believes such statements are belied by BVES’s WMP performance, which includes a demonstrated decrease in wildfire risks, significant progress in grid hardening efforts (e.g., the complete replacement of all expulsion fuses, all primary evacuation routes hardened, covered wire program on track, etc.), and safer, more targeted and restrictive operating protocols during periods of increased fire threat.

Cal Advocates recommends that Energy Safety host a conference prior to BVES’s 2023 filing to ensure BVES has addressed all critical issues identified in its 2022 WMP Update.⁴ BVES fails to see the practical benefits of such a conference, and believes it would be a questionable use of scarce public and ratepayer resources. For example, stakeholders would not have had an opportunity to review BVES’s 2023-2025 WMP and therefore would have no specific topics to provide feedback to BVES. The current process provides ample opportunity for stakeholders to provide comments and utilities to respond and adjust, where appropriate, to developing Bear Valley’s 2023-2025 WMP.

¹ In response to April 18, 2022, draft recommendations by OEIS, the Wildfire Safety Advisory Board recommended modified WMP guidelines for small utilities that would help them to best allocate limited resources and potentially relieve them from more detailed reporting requirements that are more applicable for the large IOUs.

² Cal Advocates in its reply comments takes issue with 12 of the 23 issues, which while too many, does clearly not support its alarming statement. Further, as discussed throughout this response, BVES believes it reasonably addressed all 23 issues.

³ Cal Advocates reply comments at p. 2.

⁴ Cal Advocates reply comments at pp. 2-3.

Further, BVES does not agree with Cal Advocates’ recommendation that “Energy Safety should ... require BVES to file its 2023 WMP earlier than the other small IOUs in 2023” with the intent that BVES could “potentially receive and address a Revision Notice earlier in the year.”⁵ BVES does not see how such a proposal will lead to a better BVES WMP. It appears to needlessly initiate the entire process earlier for BVES than any other utility. And it could potentially conflict with the WMP pre-submittal process contemplated in the draft 2023-2025 WMP Guidelines issued on September 19, 2022. This pre-submittal process will provide Energy Safety with ample opportunity to identify WMP issues prior to the final submittal. Cal Advocates offers no evidence that accelerating an already tight workload schedule on BVES’s small staff will add value to the BVES WMP process, improve the quality of BVES’s WMP, or increase public safety. Without more clear justification and evidence that its proposal will likely yield a materially better BVES WMP, this recommendation should be rejected.

III. Discussion of Specific Issues

Cal Advocates notes in its comments that “RN-BVES-22-01, RN-BVES-22-03, RN-BVES-22-04, and RN-BVES-22-07 are of particular concern to Cal Advocates.”

In BVES’s Revised WMP, BVES provided a table “Summary of Actions in Response to Energy Safety’s Revision Notice”⁶ in which BVES cited exactly where each issue raised in the revision notice was addressed.⁷ Additionally, BVES issued a letter response to Energy Safety on August 29, 2022, *BVES Response to the Office of Energy Infrastructure Safety Revision Notice*, in which BVES also cited where each issue raised in the revision notice was addressed. As such, Cal Advocates’ claim that certain action items were not addressed is misguided as further discussed in detail below.

1. Issue RN-BVES-22-01 Additional Issues

4.1.A – Metrics

Section 8386(c)(4) of the Public Utilities Code requires “A description of the metrics the electrical corporation plans to use to evaluate the plan’s performance and the assumptions that underlie the use of those metrics.” BVES minimally meets this requirement by providing performance metrics and underlying data within WMP Tables 1-10.

BVES provided the information required by each specific section in Section 6 in Attachment A to the 2022 WMP Update and in Appendix D QDR Tables. Each specific QDR table is referenced in Section 6. The references to this information were bolded in the response to the revision notice to provide more clarity. Additionally, with the exception of QDR Table 3 metrics, the metrics used are those set forth by Energy Safety.

⁵ Cal Advocates reply comments at pp. 3.

⁶ BVES Revised WMP at pp. ii-v.

⁷ BVES notes that it inadvertently left issue 4.1A off the table in the *Wildfire Mitigation Plan – 2022 Revision 1* submitted in response to the *Revision Notice*. However, did however address the issue in Section 6 of the revised WMP.

5.2.A – Situational Awareness - Wire Down Detection

BVES continues to discuss the installation of fiber optic communications in its service territory as a foundational investment to enable advanced technologies such as, wire down detection, rapid earth fault current limiter, and diagnostic technologies. However, BVES does not adequately address the conditions outlined by BVES-R5 (Class C). It remains unclear whether BVES is implementing a Down Wire Detection program or is still monitoring commercial development of Down Wire Detection technology.

Regarding issue 5.2.A,⁸ Cal Advocates claims “there is no indication ... as to whether BVES intends to develop such a program.”⁹ Cal Advocates even states that “The phrase ‘down wire detection’ does not appear in the Revised 2022 WMP. There is no indication in the pertinent section as to whether BVES intends to develop such a program.”¹⁰ Contrary to Cal Advocates’ claim, BVES updated Section 7.3.3 of the revised WMP, as indicated in the summary table “Summary of Actions in Response to Energy Safety’s Revision Notice,” to address this issue. Specifically, BVES states:

“BVES continues to monitor industry practices as it relates to wire down detection programs. BVES currently does not have a wire down detection program, nor does it have a timeline to procure one. As solutions are developed in this space and BVES is able to collaborate with other utilities on the effectiveness (target of greater than 85%) of their programs BVES will invest in such technology.”¹¹

Cal Advocates may have performed a cursory word search to reach its conclusions. Had it reviewed the content which was highlighted by BVES in its submission, it may have reached a different conclusion.

5.3.A.2 – Grid Design and System Hardening - Pole Replacement

BVES states that it “has an ongoing program to assess and remediate noncompliant distribution poles” but does not provide any actual details on what that program consists of, if it differs outside of routine GO 95 and 165 efforts, or how BVES actually plans on targeting “priority pole replacements and remediations.” [Citations Omitted]

In the reply comments, Cal Advocates accurately notes that “the term ‘priority pole’ does not appear to be defined in the Revised 2022 WMP.”¹² BVES notes, however, Energy Safety never requested BVES to define “priority pole” but, rather, asked for additional details about the program and how BVES targets pole replacements and remediations. In its Revised WMP, BVES added language to sections 7.3.3.3 “Covered Conductor Installation” and 7.3.3.6

⁸ *Revision Notice*, July 07, 2022, Section 5.2, at p. ii. “BVES continues to discuss the installation of fiber optic communications in its service territory as a foundational investment to enable advanced technologies such as, wire down detection, rapid earth fault current limiter, and diagnostic technologies. However, BVES does not adequately address the conditions outlined by BVES-R5 (Class C). It remains unclear whether BVES is implementing a Down Wire Detection program or is still monitoring commercial development of Down Wire Detection technology.”

⁹ Cal Advocates reply comments at p. 4.

¹⁰ Cal Advocates reply comments at p. 4.

¹¹ Revised WMP at p. 160, Section 7.3.3.

¹² Cal Advocates reply comments at p. 5.

“Distribution Pole Replacement and Reinforcement, including with Composite Poles” that provided additional details that demonstrate how BVES goes beyond GO 95 and 165 and the regional prioritization considerations.¹³ GO 95 requires “Any entity planning the addition of facilities shall ensure the addition of the facilities will not reduce the safety factors below the values specified by Rule 44.3.”¹⁴ BVES goes beyond this requirement by not only evaluating facilities that are being upgraded but also evaluating facilities that are not being upgraded. Such action, although not required, allows BVES to be pro-active in ensuring facilities are meeting proper safety factors for strength. In many instances, BVES conducts the GO 165 intrusive pole inspections more frequently than the minimum timeframes required by GO 165.

Additionally, GPI commented that BVES uses “vague implementation methods” and that the Revised WMP “does not include core elements of a project proposal, namely ‘how’ the work will be done (Methods section), scope of the project (Scope of work), or when the project is scheduled (Complete project timeline, Gantt Chart).”¹⁵ BVES believes such elements are excessively prescriptive for BVES’s WMP and would make an already overburdened “plan” document even more cumbersome for a small utility and its staff. Additionally, much of the data GPI seeks is included in the Quarterly Initiative Updates and the Quarterly Data Reports.

5.5.C – Vegetation Management – Slash Removal and Handling

Condition BVES-R2 requires BVES to “provide detailed information on its fuels management and slash reduction practices.”⁷⁵ Instead of describing its own fuels management practices, BVES instead discusses fuels management activities performed by other entities including Big Bear Fire Department and Bear Valley Community Service District.⁷⁶ While it is laudable that the Big Bear Valley Community as a whole is addressing fuels management issue, Energy Safety expects BVES to detail its own fuels management activities and how it has contributed to the community fuels management activities it describes. BVES states that fuels management activities are required “by GOs and applicable standards.”⁷⁷ General Orders (GOs) do not mention fuels and “slash” management; instead, these standards are outlined by the Board of Forestry’s Forest Practice Rules and Public Resources Code 4293; as such, Energy Safety is concerned that BVES is not implementing “applicable standards.” [Citations Omitted]

As described in Section 7.3.5.5 of the Revised WMP, BVES uses contractors to perform its fuels management and slash removal work.¹⁶ The vegetation management contractor is required to remove and properly dispose all vegetation waste and slash from the area on a daily basis. Additionally, nearly all of BVES’s overhead facilities run parallel to community/residential streets and the debris is chipped and hauled at the time of the vegetation trimming. Accordingly, BVES disagrees with GPI’s recommendation to “specifically requir[e] this information in the 2023 [WMP] guidelines/template in the form of narration, with a future deadline for when utilities will be expected to complete a table on the destination of woody debris.” BVES does not agree that such a recommendation is necessary to improve public safety.

¹³ Revised WMP at pp. 171-172. BVES notes that there is an incorrect reference in the “region prioritization” description to section 7.3.2.2 that should be to 7.3.3.3.

¹⁴ General Order 95 (<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M338/K730/338730245.pdf>)

¹⁵ GPI reply comments at p. 2.

¹⁶ Revised WMP at p. 224.

BVES further emphasizes the importance of fuels management performed by Big Bear Fire Department and the Bear Valley Community Service District. Unlike most of the other investor-owned utilities in California, BVES's service territory coincides with the municipal boundaries of Big Bear, and fuels/hazard reductions are coordinated among the community and with the US Forest Service. Lastly, in Big Bear's harsh winter climate, BVES does not believe its low-income firewood program is trivial.

5.6.A – Grid Operations and Protocols – Ignition Prevention and Suppression Crew

BVES does not have specific crew designated for ignition prevention and suppression, instead relying on de-energizing work, and maintaining the ability to contract work out if deemed necessary. BVES did not provide details on the thresholds used to determine when ignition prevention and suppression work would be contracted.

BVES does not believe an additional threshold is necessary or appropriate at this time. Bear Valley responded to this issue raised by Energy Safety by adding additional language to Section 7.3.6.3 clarifying that BVES only conducts low-risk work or training on high fire threat days. BVES explained in detail why such an approach works for a utility as small as BVES. Additionally, BVES's service area is very compact, and the Big Bear Fire Department can respond to anywhere in the service area in 10-15 minutes. Additionally, BVES line crews always carry fire extinguishers and would immediately radio for additional help if an ignition were to occur.

5.8.B – Resource Allocation Methodology – RSE Estimates

For Capability 41c of the 2021 Maturity Survey, BVES selected "RSE estimates are verified by historical or experimental pilot data" for 2021 and "RSE estimates are verified by historical or experimental pilot data and confirmed by independent experts or other utilities in CA" for 2023. However, BVES does not provide details in its 2021 WMP Update regarding the verification of RSE estimates. [Citations Omitted]

BVES submitted additional information in the revised WMP including new weighting granularity that enables the use of the HFTD zone to be part of the evaluation as described in Section 4.5.1.¹⁷ These values and calculations continue to be updated over time. BVES's risk assessment tools (see Issue RN-BVES-22-03 below for additional discussion) will continue to be updated over time as BVES obtains more granularity about system, circuit, and span risk as it overlays that topography and climate of BVES. BVES has historical data, but it is not extensive as would be expected for a small utility; therefore Subject Matter Experts (SMEs) verify their assessments utilizing the limited past data as well as their experience and knowledge to verify RSEs. What is known, is that BVES has never experienced an ignition or caused a wildfire. Therefore, BVES looks at potential ignition events, such as vegetation contact with bare wire, live wire down, blown conventional fuses, etc. Note that in verifying RSEs, SMEs are actually verifying the components that make up RSEs – cost, magnitude of risk, and magnitude of risk reduction.

¹⁷ BVES Revised WMP at p. 61.

6.B – Public Safety Power Shutoff – Coordination with SCE

BVES says it “will endeavor to follow lessons learned across California regarding the use of PSPS and will update its PSPS Plan and Emergency Response Plan accordingly.”⁸³ This statement does not articulate an adequately proactive approach toward testing and articulating effectiveness of its PSPS and Emergency Response plans in upcoming fire seasons. [Citations Omitted]

BVES has taken several steps to coordinate its PSPS plan and planning with Southern California Edison and to participate in joint testing with SCE, especially as it pertains to the potential loss of SCE lines that deliver power to BVES. While Cal Advocates is correct that Table 8.1-1 has not changed in the revised WMP,¹⁸ that does not necessarily indicate that BVES did not respond to Energy Safety’s concern. BVES revised sections 7.3.9 “Emergency Planning and Preparedness” and Section 8.2 “Protocols on Public Safety Power Shut-off.” Additionally, BVES has participated in SCE’s PSPS exercises and SCE participated in BVES’s PSPS exercise.

2. Issue RN-BVES-22-03 – Grid Hardening and System Design – Risk Assessments and Project Prioritization

BVES has not sufficiently connected its risk assessment with its mitigation initiative prioritization.

In the Final Action Statement on BVES’s 2021 WMP Update, Energy Safety identified a key area of improvement (BVES-21-07) that requires BVES to provide more detail on how it uses risk assessment(s) to inform prioritization of initiatives, particularly for grid hardening efforts. BVES completes risk assessments to determine the highest risk circuits along its system, including its Fire Safety Circuit Matrix and Reax wildfire risk maps, yet its discussion of how it uses the risk assessment outcomes to prioritize and determine locations for initiatives is inadequate. This risk informed discussion for each initiative should be under subsection “Region Prioritization;” however, BVES’s discussions in “Region Prioritization” either lacks details or defaults prioritization to HTFD Tier 2 and Tier 3 designations (in which BVES’s entire service territory resides, see Figure 1), instead of being directly informed by BVES’s completed risk assessments.

In the Revised WMP, BVES included a substantial description of how its risk assessments drive project selection and prioritization in Section 7.1¹⁹ and throughout the initiative descriptions in Section 7.3. Contrary to the assertion by GPI, BVES does not “prioritize projects with the least ‘resistance’ versus projects located in the highest risk locations.”²⁰ This “approach” is not reflected in either the BVES WMP, or the actions on the ground.

BVES’s risk assessment continues to evolve. As described in RN-BVES-22-01 Issue 5.8B above, BVES continues to improve and refine its Risk Spend Efficiency calculation weighting and methodology to adapt to changing risk factors (through risk reduction projects and climate drivers) as well as the improved understanding of risk factors present in the BVES service territory including ignition probability and ignition consequence mapping. As discussed in the WMP, and dismissed by the reply comments, BVES is wholly located within Tier 2 and Tier 3

¹⁸ Cal Advocates comments at p. 5.

¹⁹ BVES included a flowchart on p. 124 of the revised WMP and is described on pp 124-127 of the Revised WMP.

²⁰ GPI comments at p. 5.

HFTDs in a dry forested mountain region. The service territory is also very compact, with a substantial portion of the area composed of wildland urban interface (WUI). As we saw, in the recent Radford Fire, the entire area will potentially be put in jeopardy by any wildland fire in the service territory. Accordingly, nearly all the overhead facilities within BVES carry substantial risk of igniting a consequential wildfire. This does not mean that BVES does not consider relative risk or dismisses higher risk efforts if barriers are presented but rather that real risk reduction is achieved by projects on most circuits in its territory. The relative risk differential between BVES's highest and lowest risk circuits or spans is significantly smaller than most, if not all California IOUs. Therefore, while risk reduction of the highest risk circuits is the priority, other factors (such as permitting) that help identify projects that can be implemented more quickly than other projects are important considerations in Bear Valley's decision-making process.

In 2021, BVES contracted with REAX to develop risk maps that identified ignition risk and wildfire consequences. This effort was completed in the fourth quarter of the year and BVES did not have the opportunity to incorporate the findings into its Fire Safety Circuit Matrix before the drafting of the 2022 WMP Update. In 2022, BVES hired Technosylva to take an additional look at the risk data for the territory. Technosylva's work is almost complete, and once done, BVES looks to incorporate the findings into its risk assessment tools for the 2023 WMP update. BVES believes these tools will help further quantify BVES's inherent wildfire risk and help it prioritize its work in the future.

Project risk reduction is the most important of several factors considered when BVES looks to conduct wildfire mitigation risk reduction projects in its territory. That other considerations are contemplated in this process should be reassuring to both BVES's customers, its community, and its regulators. BVES wants to ensure that projects will effectively, efficiently, and timely reduce risk. BVES utilizes its professional staff, expertise, and deep knowledge of its territory to evaluate each project and its cumulative effect on BVES's reliability, safety, resiliency, and rates. To apply arbitrary weighting to each factor is certainly possible, but not desirable as it could lead to outcomes that do not align with these core objectives.

3. Issue RN-BVES-22-04 Asset Management and Inspections - Quality Assurance & Quality Control

BVES has not provided sufficient information on quality assurance & quality control (QA/QC)

In its Final Action Statement on BVES's 2021 WMP Update, Energy Safety identified a key area of improvement (BVES-21-09) that required BVES to develop and provide updates on its adoption of a formal QA/QC process for asset inspections. However, in its 2022 Update, BVES provides little detail on the progress it has made in developing its formal QA/QC program and little to no details on any pre-existing or interim QA/QC processes. Instead, BVES only states that it will adopt a formal asset inspection program in late 2022. Notably, BVES did not complete any QA/QC checks or audits of asset inspections in 2021.¹⁸ Under Public Utilities Code section 8386(c)(19)(C), BVES must do the following:

Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, carried out under the plan and other applicable statutes and commission rules.

BVES has not demonstrated that it is auditing and checking its existing asset management inspection practices.

In its Revised WMP, BVES added additional information to its description of its QA/QC program for asset inspections. BVES partially agrees with commenters that this program needs additional refinement, statistical analysis, and clarity.²¹ This program, along with its vegetation management counterpart, is still a work in progress. The initial asset inspection QA/QC program was developed in the fourth quarter of 2021 and has been refined since its initial implementation. This is a process BVES continues to work on and is confident it will undergo additional maturity in the 2023 WMP Update and beyond.

BVES's Field Inspector, who performs the QA/QC asset inspections (patrols and detailed inspections) is an IBEW lineman with 15 years of experience as a journeyman lineman and over thirty years of utility equipment and safety experience. This individual is supervised by the BVES Field Operations Supervisor who has over forty years of utility safety and inspection experience. Both of these individuals, and the other linemen employed by or contracted to BVES are IBEW members with substantial amounts of seminar/classroom and on the job training. The qualifications for BVES linemen and inspectors are described in detail in section 5.4 of the Revised WMP. Additionally, BVES has recently dedicated a member of the engineering staff to be the QA/QC Coordinator. This individual has experience with aerospace industry QA/QC and will assist in improving QA/QC documentation practices.

Additionally, BVES included an example of the quality control information collected in its asset inspection quality control program in Section 7.3.4.14²² of the Revised WMP. In the future, BVES will also be including the applicable information in Tables 3 and 12 of the quarterly data report (QDR) for asset inspection quality control statistics and the quarterly initiative update (QIU), and assuming the new metrics are fully approved by Energy Safety, the resolution time between the discovery of Level 1, 2, and 3 issues and their time to resolution.

4. Issue RN-BVES-22-05 Vegetation Management and Inspections – Enhanced Vegetation Measures

BVES describes many mitigation initiatives in its vegetation management program as “enhanced;” however, some of these “enhanced” initiatives only meet minimum regulatory requirements, as identified in Table 1. While these initiatives may have “enhanced” aspects, BVES does not explain what aspects of these initiatives exceed GOs and other regulatory minimums.

In its Final Action Statement on BVES's 2021 WMP Update, Energy Safety identified an additional issue related to BVES's use of the term “Enhanced Vegetation Management” (EVM)

²¹ Cal Advocates comments at pp. 8-9, GPI comments pp. 6-8.

²² Revised WMP at pp. 214-215.

to describe numerous aspects of its vegetation management (VM) program. In 2021, BVES used “EVM” to describe fuel reduction, “collaborative measures with the USFS,” “off-schedule” risk-based inspections and VM activities, the contracting of a full-time utility forester, at-risk species remediation, strike potential tree removal, its vegetation inventory system, and equipment clearances. Energy Safety directed BVES to use the term “EVM” more deliberately and align its definition of EVM with its peer utilities in its 2022 WMP Update.

In its 2022 Update, BVES continues to use “EVM” to describe most of its VM program: detailed inspections,² fuels reduction, LiDAR inspections,³⁰ patrol inspections,³¹ identification and mitigation of “at-risk” species,³² hazardous tree removal,³³ its vegetation inventory system,³⁴ and clearances.

However, when describing “enhanced inspections” and mitigation practices, BVES repeatedly refers to meeting minimum regulatory requirements. In some of these instances, BVES references “exceeding” requirements, yet does not describe how it is exceeding requirements; see Table 1 below. Energy Safety defines “enhanced” as an inspection or activity whose frequency, thoroughness, and/or process exceeds regulatory and/or statutory requirements. [Citations Omitted]

BVES does not agree with Cal Advocates’ statement that its vegetation management program only meets minimum regulatory requirements.²³ First, it is wrong to imply meeting minimum regulatory standards is deficient as Cal Advocates seems to imply. Second, as described in Section 7.3.5 and clearly laid out in Table 7.3-5 BVES certainly performs vegetation management beyond the minimum regulatory requirements including, but not limited to, enhanced clearances and increased and improved inspections. BVES also added additional clarification in Sections 7.3.5.2, 7.3.5.5, 7.3.5.11, 7.3.5.15, 7.3.5.16, 7.3.5.19, and 7.3.5.20.

BVES also notes that “enhanced vegetation management” is not defined by Energy Safety or the CPUC. BVES uses the terminology “enhanced vegetation management” to mean actions in vegetation management that go beyond the minimum requirements. If Energy Safety disagrees with BVES’s understanding of this terminology, it may be helpful for Energy Safety to define what activities are sought and required to establish an enhanced vegetation management program.

Lastly, in responses to GPI’s statement regarding community outreach support²⁴ raised in Section 7.3.5.1 of the Revised WMP. This is in reference to the outreach in collaboration with USFS and other stakeholders. These efforts have associated costs (community briefs, mailers, newsletter, website maintenance, etc.) that accounts for the total of \$35,822.²⁵ BVES also outlines that it supports already established programs such as Fuels Management and Defensible Space Community Program, Big Bear Fire Department Hazardous Tree Removal Program, Curbside Chipping Program, and The Bear Valley Community Service District CAL FIRE grant to address wildfire hazard in Bear Valley Springs. BVES notes that it will continue its outreach

²³ Cal Advocates comments at p. 10.

²⁴ Revised WMP at p. 220.

²⁵ GPI comments at p. 8.

with USFS and other agencies in an effort to develop collaborative measures in the area of fuels management.

5. Issue RN-BVES-22-07 – Resource Allocation Methodology – Risk Reduction and RSE
BVES does not describe how quantifiable risk reductions and RSE estimates inform initiative selection.

BVES lacks transparency regarding its decision-making process and does not provide an explanation of where quantifiable factors such as costs, risk reduction values and RSE estimates are considered in each initiative selection. This is not in accordance with the 2022 WMP Guidelines, which direct the following:

Discuss how risk modeling outcomes are used to inform decision-making processes and used to prioritize mitigation activities. Provide detailed descriptions including clear evaluation criteria and visual aids (such as flow charts or decision trees). Provide an appendix (including use of relevant visual aids) with specific examples demonstrating how risk modeling outcomes are used in prioritizing circuit segments and selecting mitigation measures. [Citations Omitted]

This issue is addressed as part of the discussions in response to sections RN-BVES-22-01 Issue 5.8B and RN-BVES-22-03 above.

6. Issue RN-BVES-22-08 - Emergency Planning and Preparedness - Service Restoration Workforce

BVES does not provide details or information on what hiring, retaining, and training practices it engages in or has implemented as it relates to BVES's service restoration workforce. Instead, in Section 7.3.9.1 "Adequate and trained workforce for service restoration" of its 2022 Update, BVES vaguely states that it has "taken actions to identify, hire, retain, and train qualified workforce to conduct service restoration in response to emergencies, including short-term contracting strategy and implementation."

The 2022 WMP Guidelines require that BVES "report detailed information for each initiative." Additionally, Deficiency Guidance-8, Class C, "Prevalence of equivocating language – failure of commitment," requires BVES (and all electrical corporations) to "[d]ispense with empty rhetoric and not use terms that are ambiguous, misleading, or otherwise have the result of diluting commitments."

The vague language BVES's uses in this section prevents Energy Safety from understanding the specific details on BVES's hiring and training practices (as well as its contracting strategy) that ensure BVES has a workforce trained to respond to emergencies. [Citations Omitted]

BVES addressed this issue in its Revised WMP Sections 5.4 and 7.3.9. Service restoration is not a new or unusual operational imperative for BVES. BVES is in a heavy loading region under GO 95 as it is above 3000 feet elevation and receives heavy snowstorms in the winter. These winter storms often bring storm-related outages which require restoration efforts by BVES crews. Additionally, as with other utilities, especially those that experience winter driving conditions,

drivers sometimes crash into utility poles. As such, BVES’s line crews are experienced in patrolling circuits for faults and performing restoration action from the outages. As mentioned above, BVES uses IBEW member linemen with substantial safety and training prerequisites that include both classroom and on-the-job training requirements. While BVES does not agree that “the inclusion of focus and learning goals”²⁶ and additional training details are necessary, BVES will include additional details about its crews in Section 5.4 (or its equivalent) in its 2023 WMP Update. BVES will primarily use its own staff to restore power, but in an emergency BVES may also utilize contractors or the California Utilities Emergency Association (CUEA) mutual aid to augment its workforce to restore power. The contractors are also IBEW linemen and the CUEA line crews are as well. If there is equipment damage, BVES can access its own spare equipment and material stocked in its yard and spare equipment and material at its primary contractor’s stock yard in Big Bear Lake. Also, BVES’s primary material supplier stocks substantially more equipment and material nearby (an approximately 2-hour drive).

If BVES needs to restore service from a PSPS or other wildfire related outage, the crews will patrol each circuit to look for vegetation or equipment issues prior to service restoration. Any Level 1 issues will be mitigated prior to restoration of power.

7. Issue RN-BVES-22-09 – Stakeholder Cooperation and Community Engagement – Cooperation with the US Forest Service

BVES uses vague language to describe United States Forest Service and fuel reduction cooperation activities.

Similar to issue RN-BVES-22-08, BVES does not provide details or information in regard to what specific strategies it is implementing or what actions it is taking to improve its engagement with the United State Forest Service and fuel reduction stakeholders. Instead, BVES uses vague language in Section 7.3.10.4 of its 2022 Update “Forest service and fuel reduction cooperation and joint roadmap,” stating that it is “implementing strategies and taking actions to continue to improve engagement with local, state, and federal entities responsible for or participating in forest management and fuel reduction activities; and design utility cooperation strategy and joint stakeholder roadmap (plan for coordinating stakeholder efforts for forest management and fuel reduction activities).”

The 2022 WMP Guidelines require that BVES “report detailed information for each initiative.” Additionally, Deficiency Guidance-8, Class C, “Prevalence of equivocating language – failure of commitment,” requires BVES (and all electrical corporations) to “[d]ispense with empty rhetoric and not use terms that are ambiguous, misleading, or otherwise have the result of diluting commitments.” [Citations Omitted]

Both Cal Advocates²⁷ and GPI²⁸ request more concrete evidence of BVES’s cooperation with the USFS. BVES holds regular, but informal, meetings with the USFS, and intends to make these meeting more formal and keep meeting documentation moving forward. BVES does not have a formal MOU with the USFS. BVES has an effective, functioning working relationship with the

²⁶ Cal Advocates comments at p. 11.

²⁷ Cal Advocates comments at pp. 11-12.

²⁸ GPI comments

USFS with regard to vegetation management. BVES is not able to compel the USFS to meet more often nor does BVES have a need to meet more often. The USFS works with many organizations, public and private, and has established processes for conducting business and; therefore, generally does not engage in individual MOUs; especially when there are processes in place to handle coordination issues. While the relationship between the USFS is long-running, strong, and cooperative, BVES does not have the ability to set the agenda for the USFS, despite the wishes of the commenters.

IV. Conclusion

BVES recognizes and has responded to the comments provided by Cal Advocates and GPI, and provided additional clarity. As demonstrated above, BVES has, in fact, reasonably responded to all Revision Notice issues in its Revised WMP. More importantly, its WMP and its associated documentation is an area of continuous improvement and adaptation with the changing wildfire mitigation landscape from improved understanding of mitigation efforts and regulatory demands. BVES will continue to fortify its WMP programs especially in the areas of concern identified by public comment, and endeavor to address the issues noted in the next WMP cycle. In furtherance of these goals, BVES remains open to constructive discussions regarding WMP issues with interested parties and stakeholders.

Sincerely,

/s/ Paul Marconi

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