



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2544
Fax: (415) 703-2057

<http://publicadvocates.cpuc.ca.gov>

PUBLIC ADVOCATES OFFICE DATA REQUEST

No. CalAdvocates-BVES-2022WMP-12
Proceeding: 2022 Wildfire Mitigation Plans

Date of issuance: Friday, September 2, 2022
Due date: Thursday, September 8, 2022

To: **Paul Marconi**
Bear Valley Electric Services Email: Paul.Marconi@bvesinc.com

Nguyen Quan
Bear Valley Electric Services Email: Nguyen.Quan@gswater.com

From: **Holly Wehrman**
Senior Utilities Engineer Phone: (415) 696-7319
Public Advocates Office Email: Holly.Wehrman@cpuc.ca.gov

Carolyn Chen
Attorney Phone: (415) 703-1980
Public Advocates Office Email: Carolyn.Chen@cpuc.ca.gov

Layla Labagh
Attorney Phone: (415) 696-7372
Public Advocates Office Email: Layla.Labagh@cpuc.ca.gov

Cal Advocates Wildfire Discovery Email: CalAdvocates.WildfireDiscovery@cpuc.ca.gov

INSTRUCTIONS

You are instructed to answer the following Data Request in the above-captioned proceeding, with written, accurate responses per Public Utilities Code §§ 309.5(e) and 314, and Rule 1.1 of the California Public Utilities Commission's (CPUC's) Rules of Practice and Procedure, and the Office of Energy Infrastructure Safety's guidelines for WMP discovery.¹

Restate the text of each data request question prior to providing the response. Provide the name and title of the responding individual (i.e., the person responsible for the content of your answer) for each data request question. If the responding individual is not your employee, please provide their name, title, and employer, as well as the name and title of your employee who is directly responsible for the work of the responding individual.

Please send your responses and inquiries to the originators of this data request (that is, the Public Advocates Office employees and attorneys listed on the cover page), with copies to the following representatives of the Public Advocates Office:

1. CalAdvocates.WildfireDiscovery@cpuc.ca.gov
2. Henry.Burton@cpuc.ca.gov
3. Natalie.Shamp@cpuc.ca.gov

Requests for Clarification: If a request, definition, or instruction, is unclear, please notify the originators in writing as soon as feasible, including a specific description of what you find unclear and why. If possible, please provide a proposal for resolving the issue. In any event, unless directed otherwise by the originators, answer the request to the fullest extent possible, explain why you are unable to answer in full, and describe the limitations of your response.

Incomplete responses: If you are unable to answer a question completely, accurately, and with the specificity requested, notify the originators as soon as possible. If possible, please provide a proposal for resolving the issue. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

Timing of responses: Please respond to each question as soon as your complete response to that specific question is available, and no later than the due date listed on the cover sheet.

Deadline extension requests: If you are unable to provide a complete response to each question by the due date noted on the cover page, contact the originators in writing to request a deadline extension. Please submit your deadline extension request as soon as feasible. In your deadline extension request, please (1) specify the questions affected by the delay, (2) propose an alternative response date and (3) provide a written explanation as to why the deadline cannot be met.

¹ Office of Energy Infrastructure Safety, *Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines*, December 15, 2021. See Attachment 5: Guidelines for Submission and Review of 2022 Wildfire Mitigation Plan Updates, pp. 10-11.

Objections: If you object to any portion of this data request, please submit your objections, including the specific legal basis for each objection, to the originators as soon as possible. *At the latest*, submit your objections and legal bases by the objection deadline on the cover sheet.

Response format: Responses should be provided in the original electronic format if available, and otherwise, in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.)

- All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.
- Each page should be numbered.
- If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning.
- Documents produced in response to the data request should be Bates-numbered and, if voluminous, indexed.
- Responses to the data request that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

Other questions: For any questions, email the originators (the Public Advocates Office employees listed on the cover page), including the Public Advocates Office’s attorney.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” “Bear Valley,” and “BVES” mean Bear Valley Electric Service and any and all of its respective present and former employees, agents, consultants, attorneys, and officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of this Data Request any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1 through January 31” should be understood to include both the 1st of January and the 31st of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.
- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of

this Data Request any information or documents which might otherwise be considered to be beyond their scope.

- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The terms “document,” “documents,” or “documentary material” include, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, and discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of this data request.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean to consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of this data request.
- H. “Identify”:
 - i. When used in reference to a Company employee, “identify” includes stating their full name and title.
 - ii. When used in reference to a consultant or contractor for the Company, “identify” includes stating the person’s name, title, and employer, and the name and title of the Company employee who is directly responsible for the work of the consultant.
 - iii. When used in reference to a person who is not a current Company employee, consultant, or contractor, “identify” includes stating the person’s name; most recent

title and supervisor at the Company; and most recent known employer, title/position, and business address;

- iv. When used in reference to documents, “identify” includes stating the nature of the document (e.g., letter, memorandum, study), the date (if any), the title of the document, the identity of the author, and the general subject matter of the document. For documents not publicly available, please also provide the location of the document, and identify the person having possession, control or custody of the document.
- I. When requested to “state the basis” for any statement (i.e., any analysis, workpaper, study, proposal, assertion, assumption, description, quantification, or conclusion), please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, report, and analysis available to you which you believe to support the statement, or which you contend to be evidence of the truth or accuracy thereof.
- J. “CPUC” and “Commission” mean the California Public Utilities Commission.
- K. “Cal Advocates” means the Public Advocates Office.
- L. “Energy Safety” and “OEIS” mean the California Office of Energy Infrastructure Safety.
- M. “WMP” means wildfire mitigation plan.

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?

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

- 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?

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.

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.

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.

- 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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

END OF REQUEST