

This submission serves as a response to the data request (DR) issued by the Wildfire Safety Division (WSD) on February 26, 2020 pursuant to Resolution WSD-001. On March 2, 2020, Bear Valley Electric Service (BVES) requested an extension, with supporting justification. The WSD granted an extension for all electrical corporations through close of business day on March 6, 2020. BVES has compiled a summary of responses or direction to the updated material packaged for this DR, located in this workbook, to address the "Item Index" listing. Supporting materials are also identified below.

In response to this data request, BVES submits the following materials:

1. Revised 2020 Wildfire Mitigation Plan (WMP) with redlines;
2. Revised 2020 WMP Clean version;
3. Direct Responses to the DR Item Index questions, mapping to corresponding materials as well as the

WMP restructure change history (located in this workbook);

4. Redlined Attachment 1 workbook;
5. Clean Attachment 1 workbook; and
6. GIS package with revised shapefiles.



BVES GIS Shapefile layer data

- BVES_Data.gdb
 - BVES_CriticalFacilities
 - BVES_Customers_Commercial
 - BVES_Customers_Residential
 - BVES_HFTD_Tier2
 - BVES_HFTD_Tier3
 - BVES_OverheadTransmissionDistribution
 - BVES_RuralAreas
 - BVES_ServiceTerritoryBoundary
 - BVES_Substations
 - BVES_UrbanAreas
 - BVES_WeatherStations
 - BVES_WUI

Data request for Bear Valley Electric Service
Date sent 2/26/2020
Response requested by 3/2/2020 (extension granted through COB 3/6/2020)
 Should you need clarification on this data request, please contact Ryan Arba (ryan.arba@cpuc.ca.gov)

This data request shall be completed according to the process outlined in Resolution WSD 001. In particular:

- Any discovery or data requests and responses shall be posted on the responding electrical corporation's website in an easy to follow format that identifies what the discovery was about, what the responses were about, and links to any documents produced. The electrical corporations shall update the website weekly, with an e-mail to the service list of R.18-10-007 with the relevant link and discussion of what is new on the website. The website (or portion of webpage) shall be labeled "2020 Wildfire Mitigation Plan Discovery/Data requests" for each electrical corporation.
- Electrical corporations must copy any data requests received from or responses to Commission staff to the e-mail address wildfresafetydivision@cpuc.ca.gov. Requests from staff to the electrical corporations may also come from this address or from individual e-mail addresses.
- Each electrical corporation shall send to wildfresafetydivision@cpuc.ca.gov the name of their single point of contact for all data requests and response matters for Commission staff use.
- Electrical corporations must respond to all data and discovery requests within 3 business days of the request. Both requests and responses shall be sent by e-mail. Exceptions to the 3-business-day requirement will require a letter to the Division Director and a strong showing of the specific reason for the delay. In your response to each data request please specify the relevant item index being responded to, found here in column B.
- Parties conducting discovery must first analyze the significant data that will be submitted with 2020 WMPs along with the Supplemental Data

No.	A. Item Index [For CPUC tracking purposes. Please reference this item index with the response provided.]	B. Request Type	C. Relevant section of WMP (if applicable)	F. Specific Data request	G. Format in which the data is to be provided	BVES Data Request Response	DR Supporting Material and Section Reference
1	BVES-43879-F-134	Request to submit missing information in WMP	mitigation strategy and programs for 2019 and for 2020	Utility needs to refile plan in proper format	Table, Narrative	BVES has refiled a restructured WMP that aligns with Attachment 1 headings and framework. Please see supporting material.	Revised WMP Narrative
2	BVES-43879-B-135	Request to submit missing information in WMP	4.3 Detailed information supporting outcome metrics	Provide more information and calculation used by SME for frequency of potential ignition impacts.	Table, Narrative	BVES has updated Table 7 to include information from the SME information related to frequency of potential ignitions. Please see supporting material.	Revised WMP Narrative, Attachment 1 Table 7
3	BVES-43879-C-136	Request to submit missing information in WMP	4.2.1 Service territory fire threat evaluation and ignition risk	It is not clear how BVES WMP matches the guidelines. Provide a resubmission that aligns with the structure in the WMP Guidelines or at least a mapping document that highlights all sections in the WMP Guidelines that are not provided in its WMP but included in the MS Excel file.	Table, Narrative	BVES has refiled a restructured WMP that aligns with Attachment 1 headings and framework. Please see supporting material.	Section 4.2.1 of the Revised WMP Narrative
4	BVES-43879-C-137	Request to submit missing information in WMP	5.3.1 Risk assessment and mapping	It is not clear how BVES WMP matches the guidelines. Provide a resubmission that aligns with the structure in the WMP Guidelines or at least a mapping document that highlights all sections in the WMP Guidelines that are not provided in its WMP but included in the MS Excel file.	Table, Narrative	BVES has refiled a restructured WMP that aligns with Attachment 1 headings and framework. Please see supporting material.	Section 5.3.1
5	BVES-43879-D-138	Request to submit missing information in WMP	5.3.2 Situational awareness and forecasting	1) For any cell in Table 22 of Attachment 1 that has "N/A," explain why it is not applicable. 2) For any cell in Table 22 of Attachment 1 that is blank, provide the value or explain why the cell is blank.	Table, Narrative	BVES has updated Table 22 with explanations supporting the "N/A" responses within the cells. Please see supporting material.	Section 5.3.2, Table 22
6	BVES-43879-E-139	Request to submit missing information in WMP	5.3.9 Emergency planning and preparedness	1) For any cell in Table 29 of Attachment 1 that has "N/A," explain why it is not applicable. 2) For any cell in Table 29 of Attachment 1 that is blank, provide the value or explain why the cell is blank. 3) For the initiatives outlined in Table 29, please provide a narrative describing how Bear Valley is planning to execute the initiative.	Table, Narrative	BVES has updated Table 29 with justification for the "N/A" responses as well as an explanation for blank cells and execution timeline expectation (within the Plan narrative). Please see supporting material.	Section 5.3.9, Table 29
7	BVES-43879-E-140	Request to submit missing information in WMP	Stakeholder cooperation and community engagement	1) Please explain why Table 30 of Attachment 1 is blank, and provide an updated version with any values available, or explain why a certain cell would be not applicable. 2) For the initiatives outlined in Table 29, please provide a narrative describing how Bear Valley is planning to execute the initiative.	Table, Narrative	BVES updated Table 30 with supporting justification for blank values. A description of timeline execution has also been included in the Plan narrative. Please see supporting material.	Section 5.3.10, Table 30
8	BVES-43879-E-141	Request to submit missing information in WMP		Within Section 5.10, describe how the plan complies with all of the mandates listed.	Table, Narrative	BVES has refiled a restructured WMP that aligns with Attachment 1 headings and framework. Please see supporting material.	Revised WMP Narrative
9	BVES-43879-H-142	Request to submit missing information in WMP	5.3.4 Asset management and inspections	Provide section 5.3.4 explanation of rationale for ignition probability-based inspections which should accompany Table 24	Table, Narrative	BVES provided supporting information within Table 24 to support ignition probability-based inspections. Please see supporting material.	Section 5.3.4, Table 24
10	BVES-43879-I-143	Request to submit missing information in WMP	2.5 Description of program targets	For any cell in Table 10 of Attachment 1 that has "N/A," explain why it is not applicable.	Table, Narrative	BVES has updated Table 10 to describe the underlying reason for the "N/A" response. These tables have also been included in the Plan narrative through the restructuring process. Please see supporting material.	Section 2.5, Table 10
11	BVES-43879-I-144	Request to submit missing information in WMP	5.3.5 Vegetation management and inspections	1) For any cell in Table 25 of Attachment 1 that has "N/A," explain why it is not applicable. 2) For any cell in Table 25 of Attachment 1 that is blank, provide the value or explain why the cell is blank.	Table, Narrative	BVES updated Table 25 to address the "N/A" responses with additional detail and provided insight on blank cells. Please see supporting material.	Section 5.3.5, Table 25
12	BVES-43879-J-145	Request to submit missing information in WMP	5.5 Planning for workforce and other limited resources	BV needs to provide a description of their plans for workforce and other limited resources	Table, Narrative	BVES has updated Section 5.5 with additional details for workforce and limited resource needs. Please see supporting material.	Section 5.5
13	BVES-43879-J-146	Request to submit missing information in WMP		Resubmit report in proper format.	Table, Narrative	BVES has refiled a restructured WMP that aligns with Attachment 1 headings and framework. Please see supporting material.	Revised WMP Narrative
14	BVES-43879-K-147	Request to submit missing information in WMP	5.3.7 Data governance	Bear Valley's whole WMP does not follow the guideline structure; if information required by 5.3.7 is available it should be provided in one place instead of directing the reader to different sections of the plan. Bear Valley should also provide an explanation for why the missing data in Table 27 is either unavailable or deemed inapplicable.	Table, Narrative	BVES has restructured the Plan to align with Attachment 1 headings and provided additional information related to Table 27 to justify missing or unavailable data.	Section 5.3.7, Table 27
15	BVES-43879-G-149	Request to submit missing information in WMP	5.3.4.2 Planned additions, removal, and upgrade of utility equipment by end of 3-year plan term	Bear Valley should provide completed Tables 16 and 17 or explain why it could not do so.	Table, Narrative	BVES has updated Tables 16 and 17 to describe the underlying reason for the "N/A" response. These tables have also been included in the Plan narrative through the restructuring process.	Tables 16 and 17
16	BVES-43879-G-150	Request to submit missing information in WMP	5.6.1 Planned utility infrastructure construction and upgrades	Bear Valley needs to follow the guideline and provide the information pertaining to section 5.6.1 as a narrative in its plan.	Table, Narrative	BVES has refiled a restructured WMP that aligns with Attachment 1 headings and framework. Please see supporting material.	Section 5.6.1
17	BVES-43879-G-151	Request to submit missing information in WMP	5.6.1 Planned utility infrastructure construction and upgrades	Bear Valley should just confirm that it has not had any ignitions, reportable or not, to alleviate reservations on this requirement.	Table, Narrative	BVES has not had any ignitions identified, reportable or not, to provide in this filing. This is also included in the refiled WMP. Please see supporting material.	Section 5.6.1
18	BVES-43879-G-152	Request to submit missing information in WMP	5.3.3 Grid design and system hardening	Bear Valley should file an amended Table 23 that includes risk reduction and risk spend efficiencies for all of its grid design and system hardening initiatives.	Table, Narrative	BVES has updated Table 23 to include available information supporting the risk reduction and risk spend efficiencies for grid design and system hardening activities. Please see the supporting material.	Section 5.3.3, Table 23
19	BVES-43879-Z -153	Request to submit missing information in WMP	6.6: Planned 2020 WMP initiative activity per year	Submit data for the locations of activities covered in the WMP. Data could include points, lines, or polygons depending on the type of activity being planned (e.g., covering conductor lines, clearing vegetation from an area, or installing equipment at specific pole locations).	GIS file	BVES does not have this information in GIS as points, lines, or polygons at this time.	N/A - BVES does not have this map data.

20	BVES-43879-Z -154	Request to submit missing information in WMP	6.5: Location of Planned utility equipment additions or removal	If additions/removals will happen for the following items, submit the data for them: - Circuit miles of overhead transmission lines - Circuit miles of overhead distribution lines - Substation locations - Determine why empty layers are empty, and, if applicable, submit replacement layers that are not empty. In the resubmission of data, give files more descriptive names that don't rely heavily on abbreviations. Also clearly label which equipment are overhead transmission lines, overhead distribution lines, and substations because these are particularly important required pieces of data.	GIS file	BVES does not have this information in GIS at this time.	N/A - BVES does not have this map data.
21	BVES-43879-Z -155	Request to submit missing information in WMP	6.4: Current baseline state of service territory and utility equipment	Resubmit all utility infrastructure data (transmission lines, distribution lines, substations, and the various pieces of equipment) with age information (e.g., a field for year of installation would suffice). Installation years could be found in other databases and linked to the GIS data via unique ID values.	GIS file	BVES has re-named its files to clearly label the overhead transmission and distribution lines and substations. BVES has also deleted any empty layers, as they are not applicable.	BVES data map package
22	BVES-43879-Z -156	Request to submit missing information in WMP	6.4: Current baseline state of service territory and utility equipment	Submit location points for weather stations if Bear Valley maintains weather stations in its service territory.	GIS file	BVES does not currently have infrastructure age in GIS at this time.	N/A - BVES does not have this map data.
23	BVES-43879-Z -157	Request to submit missing information in WMP	6.4: Current baseline state of service territory and utility equipment	Submit location points or polygons to clarify where/how many overall customer are in the service territory and how many of those customers belong to access and functional needs populations. For polygons, some form of Census divisions within the service territory could work. Despite the submission requirements mentioning "square mile resolution," you do not need to force all data into a grid with square-mile pieces.	GIS file	BVES has submitted GIS data and coordinates for its weather stations.	BVES data map package
24	BVES-43879-Z -158	Request to submit missing information in WMP	6.4: Current baseline state of service territory and utility equipment	Submit points representing critical facility locations.	GIS file	BVES has submitted the number of residential and commercial customers in a point file in GIS. BVES does not currently have functional needs populations in GIS at this time.	BVES data map package
25	BVES-43879-Z -159	Request to submit missing information in WMP	6.4: Current baseline state of service territory and utility equipment	Submit polygon data clipped to the service territory boundaries to represent the areas listed below: - Highly rural, rural, or urban areas - Wildland urban interface areas (WUI) - Tier 3, Tier 2, or Zone 1 high-fire threat districts (HFTDs) or non-HFTD	GIS file	BVES has submitted critical facility locations and coordinates in GIS.	BVES data map package
26	BVES-43879-Z -160	Request to submit missing information in WMP	6.3: Recent use of PSPS	If PSPS events occurred, submit 2015-2019 PSPS polygons with duration information and impacted customer hours.	GIS file	BVES has submitted clipped files of rural and urban areas, wildland urban interface areas (WUI), and Tier 3 and Tier 2 HFTDs. Zone 1 HFTDs are not applicable to the BVES service territory geography.	BVES data map package
27	BVES-43879-Z -161	Request to submit missing information in WMP	6.2: Recent drivers of ignition probability	Submit point data representing Liberty utility-caused ignitions that occurred from 2015-2019. Include the attributes listed in the data dictionary found here: https://kwlfp.cpsc.ca.gov/#/file/279210 This data dictionary was taken from an appendix of the "R.18-10-007 SDGE Data Collection for WMP Report 7 30 19" document. An example of an ignitions report can be found here: https://www.cpsc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Safety/PGE%20-%20Fire%20Incident%20Data%20Collection%20Plan%20-%20Report%20from%202014-2016.pdf	GIS file	No PSPS events have been initiated by BVES.	Not applicable
28	BVES-43879-Z -162	Request to submit missing information in WMP	6.1: Recent weather patterns	Submit polygon data that show the average annual red flag days in the service territory from 2015-2019. This could be in points or polygon subsections that provide wind information, and the data should be submitted in a vector format. Despite the submission requirements mentioning "square mile resolution," do not force all data into a grid with square-mile pieces.	GIS file	BVES confirmed that this question was directed to Bear Valley and not Liberty Utilities. However, BVES has included the data products and dictionary tables presented in the Data Collection for WMP's report submitted to the Commission in July 2019. Also, the utility has not experienced any historically recent ignitions involving utility equipment.	Section 5.3.7
29	BVES-43879-Z -163	Request to submit missing information in WMP	6.1: Recent weather patterns	Resubmit an data with an appropriate coordinate system. Data were submitted without a coordinate system. When first opened, the data appeared off the coast of Mexico in the ocean near Acapulco. The Define Projection tool in ArcGIS Pro was used to batch assign the data the following projected coordinate system: NAD 1983 (2011) StatePlane California V FIPS 0405 (US Feet). Only after assigning this projection did the data appear in an appropriate location.	GIS file	BVES does not currently have this data in GIS at this time.	N/A - BVES does not have this map data.
30	BVES-43879-Z -164	Request to submit missing information in WMP	6.1: Recent weather patterns	Resubmit all GIS data with metadata that follows the Federal Geographic Data Committee (FGDC) standards. Use the U.S. Geological Survey (USGS) Metadata Wizard to comply with FGDC standards. According to the USGS: "The Metadata Wizard is a user-friendly desktop application for creating, editing, and validating metadata that conforms to the Content Standard for Digital Geospatial Metadata (CSDGM) version 2.0. The Federal Geographic Data Committee (FGDC) has authored and endorsed this metadata standard as well as other standards. Metadata provides information about a data set, allowing data users to understand and appropriately use the data in different contexts. Metadata is crucial to support searchable information about data that otherwise is not directly incorporated within data and therefore undiscoverable. Metadata in its most basic form includes information about the data's origin, creators, accuracy, availability, and distribution. Metadata is necessary for the appropriate interpretation and reuse of the data, and importantly provides the necessary definitions of data content." The USGS also notes that: "The MetadataWizard is a useful tool designed to facilitate FGDC metadata creation for spatial and non-spatial data sets. It is a cross-platform desktop application built using an open-source Python architecture." Visit the links below to interpret and install the USGS Metadata Wizard: - USGS summary of Wizard: https://www.usgs.gov/software/metadata-wizard-20 - Installation of Wizard: https://github.com/usgs/fort-pymdwizard/releases/download/v2.0.6/metadatawizard_win64x_2.0.6.exe - User guide for Wizard: https://usgs.github.io/fort-pymdwizard/	GIS file	BVES has not previously tracked average annual red flag days.	N/A - BVES does not have this map data.
31	BVES-43879-Z -165	Request to submit missing information in WMP	NA	Resubmit all data with an appropriate coordinate system. Data were submitted without a coordinate system. When first opened, the data appeared off the coast of Mexico in the ocean near Acapulco. The Define Projection tool in ArcGIS Pro was used to batch assign the data the following projected coordinate system: NAD 1983 (2011) StatePlane California V FIPS 0405 (US Feet). Only after assigning this projection did the data appear in an appropriate location.	GIS file	BVES has resubmitted all the data using NAD 1983 (2011) State Plan california V FIPS 0405 (US Feet)	BVES data map package
32	BVES-43879-Z -166	Request to submit missing information in WMP	NA	Resubmit all GIS data with metadata that follows the Federal Geographic Data Committee (FGDC) standards. Use the U.S. Geological Survey (USGS) Metadata Wizard to comply with FGDC standards. According to the USGS: "The Metadata Wizard is a user-friendly desktop application for creating, editing, and validating metadata that conforms to the Content Standard for Digital Geospatial Metadata (CSDGM) version 2.0. The Federal Geographic Data Committee (FGDC) has authored and endorsed this metadata standard as well as other standards. Metadata provides information about a data set, allowing data users to understand and appropriately use the data in different contexts. Metadata is crucial to support searchable information about data that otherwise is not directly incorporated within data and therefore undiscoverable. Metadata in its most basic form includes information about the data's origin, creators, accuracy, availability, and distribution. Metadata is necessary for the appropriate interpretation and reuse of the data, and importantly provides the necessary definitions of data content." The USGS also notes that: "The MetadataWizard is a useful tool designed to facilitate FGDC metadata creation for spatial and non-spatial data sets. It is a cross-platform desktop application built using an open-source Python architecture." Visit the links below to interpret and install the USGS Metadata Wizard: - USGS summary of Wizard: https://www.usgs.gov/software/metadata-wizard-20 - Installation of Wizard: https://github.com/usgs/fort-pymdwizard/releases/download/v2.0.6/metadatawizard_win64x_2.0.6.exe - User guide for Wizard: https://usgs.github.io/fort-pymdwizard/	GIS file	BVES uses third-parties to collect its data and therefore, it may not all be in the designated format.	N/A - BVES does not have this map data.
33	BVES-43879-Z -167	Request to submit missing information in WMP	NA	FGDC-compliant metadata will include but not be limited to the following location points with at least two photos for each point (one showing damage and one showing environment around base of pole or tower with damage). Submit shapefiles or feature classes pre-linked or capable of being linked to photos. At a minimum, include the following damage-related attributes (or similar equivalents): - Was the damage likely to have caused arcing? This shall be collected in one field with potential values of "Yes," "No," or "Unknown." - Description of the damage (e.g. broken tie wire, tree branch on line, broken conductor, etc.). This shall include a dropdown menu of common damage description categories but could also include a customizable comments field that enables the documentation of uncommon damage types. - Description of the type of terrain likely to be impacted by the damage with a corresponding photo. This could also be accomplished with dropdown menus and a customizable field. This terrain may be the most likely location of an on-the-ground ignition and could be the destination/landing area for burning debris or sparks. - Best estimate of damage timeframe. Include a field for the date and a field for the approximate time of day. This will help link the most accurate weather data to the damage point.	GIS file	BVES has not initiated any PSPS events and therefore has not experienced related damage.	

34	BVES-43879-Z -168	Request to submit missing information in WMP	NA	Submit 2015-2019 point layers for other utility infrastructure damage locations with photos. Use guidance described above.	GIS file	BVES has not initiated any PSPS events and therefore has not experienced related damage.	
35	BVES-43879-Z -169	Request to submit missing information in WMP	NA	Submit applicable equipment data that includes an "Exemption_Status" field in the data's attribute tables with exemption status per PRC 4292. The values for the "Exemption_Status" field shall be: "Non-Exempt," "Temporarily Exempt," or "Permanently Exempt." While PRC 4292 is only applicable in the CAL FIRE State Responsibility Area (SRA), provide exemption status information for all applicable equipment in all locations in BVES's service territory.	GIS file	BVES does not have this information.	N/A - BVES does not have this map data.
36	BVES-43879-Z -170	Request to submit missing information in WMP	NA	attributes. Include a field to record pole or tower exempt equipment information. In the field, include the exemption status of the equipment on the pole or tower. Age information can be recorded by installation year. Also include a field to record the type of material that makes up a pole or tower (e.g., metal, wood, fiberglass, wood wrapped with fire-resistant material, etc.). You may be able to connect age, material, and exemption information to pole or tower GIS data by using ID values to join the GIS data to other databases.	GIS file	BVES has included a file with the pole and tower data in its GIS files. It does not currently have information about age or type of material at this time.	BVES data map package
37	BVES-43879-Z -171	Request to submit missing information in WMP	NA	Submit applicable equipment data with condition information (e.g., good, poor, needs repair, etc.). If some sort of equipment condition/health/status or similar index is used, include it in GIS data, and explain it in metadata. Provide condition information for all applicable equipment, including transmission lines, distribution lines, substations, and various items mounted on poles or towers.	GIS file	BVES does not have this information in GIS at this time.	N/A - BVES does not have this map data.
38	BVES-43879-Z -172	Request to submit missing information in WMP	NA	Submit GIS data for Level 1-3 findings. Data should include key information like date, level of finding, equipment affected, custom comments, etc. Below are definitions of the finding levels as taken from a 2020 WMP: Level 1 finding: In accordance with GO 95, an immediate safety and/or reliability risk with high probability for significant impact. Level 2 finding: In accordance with GO 95, a variable (non-immediate high to low) safety and/or reliability risk. Level 3 finding: In accordance with GO 95, an acceptable safety and/or reliability risk.	GIS file	BVES does not have this information in GIS at this time.	N/A - BVES does not have this map data.
39	BVES-43879-Z -173	Request to submit missing information in WMP	NA	Submit point data showing the locations of private power line/IOU power line connection points.	GIS file	BVES does not have this information in GIS at this time.	N/A - BVES does not have this map data.
40	BVES-43879-Z -174	Request to submit missing information in WMP	NA	Submit data for the latest, most precise Bear Valley service territory boundaries. Also include any divisions or subdivisions within the service territory if applicable.	GIS file	BVES has submitted GIS data with its service territory boundary. It does not have any divisions or subdivisions within the territory.	BVES data map package
41	BVES-43879-Z -175	Request to submit missing information in WMP	NA	If PSPS events occurred, submit GIS line data for circuits turned off during 2015-2019 PSPS events. In the data's attributes, at a minimum, identify the event with which the data are associated and the voltage of the lines.	GIS file	No PSPS events have been initiated by BVES.	Not applicable
42	BVES-43879-L -176	Request to submit missing information in WMP	1	Guideline 1 requests an accounting of responsibilities of the responsible person(s) executing the WMP including 2) Program owners specific to each component of the plan. Your WMP includes a table of division/departments/offices overseeing each component of the plan, not the persons or primary contacts leading those divisions/departments/offices. Please resubmit the Table 1.1 (pages 6-9) to include the names of individuals for each component listed.	Table, Narrative	BVES has refiled a restructured WMP that aligns with Attachment 1 headings and framework. Please see supporting material.	Section 1
43	BVES-43879-L -177	Request to submit missing information in WMP	2	Section 2.4 of the Guidelines requests a detail of "additional metrics" to be used in WMP 2020. Bear Valley's discussion of metrics in 2.3 (pages 14-24) does not include any proposed additional metrics or the Associated Table 3 from the templates. Please provide a more complete explanation of what additional metrics may have been considered and why none have been identified.	Narrative	BVES has refiled a restructured WMP that aligns with Attachment 1 headings and framework. Please see supporting material.	Section 2.4

BVES WMP Narrative Change Detail

Plan Narrative Heading Restructure	Section and/or Table Reference	Specific Change / Addition	A. Index Item Reference	F. Specific Data Request
1.2.2 Program Owners	Section 1.2	Included Table 1-2 Program Owners Specific to Each Component of the Plan	BVES-43879-L -176	Guideline 1 requests an accounting of responsibilities of the responsible person(s) executing the WMP including 2) Program owners specific to each component of the plan. Your WMP includes a table of division/departments/offices overseeing each component of the plan, not the persons or primary contacts leading those divisions/departments/offices. Please resubmit the Table 1.1 (pages 6-9) to include the names of individuals for each component listed.
1.2 Roles and Responsibilities for Plan Execution	Section 1.2	Included instruction box related to Attachment 1	BVES-43879-J-146	Resubmit report in proper format.
1.2.1 Executive Level Responsibilities	Section 1.2.1	Included executive level responsible parties (Name / Title)	BVES-43879-L -176	Guideline 1 requests an accounting of responsibilities of the responsible person(s) executing the WMP including 2) Program owners specific to each component of the plan. Your WMP includes a table of division/departments/offices overseeing each component of the plan, not the persons or primary contacts leading those divisions/departments/offices. Please resubmit the Table 1.1 (pages 6-9) to include the names of individuals for each component listed.
1.2.1 Executive Level Responsibilities	Section 1.2.1	Included executive level responsible parties (Name / Title) in Table 1-1	BVES-43879-L -176	Guideline 1 requests an accounting of responsibilities of the responsible person(s) executing the WMP including 2) Program owners specific to each component of the plan. Your WMP includes a table of division/departments/offices overseeing each component of the plan, not the persons or primary contacts leading those divisions/departments/offices. Please resubmit the Table 1.1 (pages 6-9) to include the names of individuals for each component listed.
2.1 Lessons Learned: How 2019 Progress Influenced the 2020 WMP	Section 2.1	Included instruction box related to Attachment 1	BVES-43879-J-146	Resubmit report in proper format.
2.2 Recent Performance on Progress Metrics	Section 2.2; Table 1	Included Attachment 1 Table 1: Recent Performance on Progress Metrics: 2015 - 2019 from Attachment 1 workbook. (Labeled Table 2-3 in the WMP)	BVES-43879-J-146	Resubmit report in proper format.
2.3 Recent Performance on Outcome Metrics, Annual & Normalized for Weather, Last Five Years	Section 2.3; Table 2	Included Attachment 1 Table 2: Recent Performance on Outcome Metrics: 2015 - 2019 from Attachment 1 workbook (Labeled 2-4 in the WMP)	BVES-43879-J-146	Resubmit report in proper format.
2.4 Description of Additional Metrics	Section 2.4; Table 3	Included Attachment 1 Table 3: List and Description of Additional Metrics: 2015 - 2019 from Attachment 1 workbook (Labeled 2-7 in the WMP)	BVES-43879-L -177	Section 2.4 of the Guidelines requests a detail of "additional metrics" to be used in WMP 2020. Bear Valley's discussion of metrics in 2.3 (pages 14-24) does not include any proposed additional metrics or the Associated Table 3 from the templates. Please provide a more complete explanation of what additional metrics may have been considered and why none have been identified.
2.5 Description of Program Targets	Section 2.5; Table 4	Included Attachment 1 Table 4: List and Description of Program Targets: 2015 - 2019 from Attachment 1 workbook (Labeled 2-8 in the WMP)	BVES-43879-J-146	Resubmit report in proper format.
2.6 Detailed Information Supporting Outcome Metrics	Section 2.6; Table 5; Table 6; Table 7	Included Attachment 1 Tables 5 - 7 into the WMP (Labeled Table 2-9, 2-10, and 2-11, respectively).	BVES-43879-J-146	Resubmit report in proper format.
2.7 Mapping Recent, Modeled, and Baseline Conditions	Section 2.7; Table 8; Table 9	Included Attachment 1 Table 8: Map File Requirements for Recent and Modeled Conditions of Utility Service Territory: 2015 - 2019 from Attachment 1 workbook (Labeled 2-12 in WMP). Also included the associated tables under Table 9: Map file requirements for baseline condition of utility service territory projected for 2020 (Listed as Tables 2-13 through Table 2-20 in the WMP).	BVES-43879-J-146	Resubmit report in proper format.
3.1 Recent Weather Patterns over the Last Five Years	Section 3.1; Table 10	Included Attachment 1 Table 10: Weather Patterns: 2015 - 2019 in the WMP (Labeled as Table 3-1)	BVES-43879-I-143	For any cell in Table 10 of Attachment 1 that has "N/A," explain why it is not applicable.
3.2 Recent Drivers of Ignition Probability over the Last Five Years	Section 3.2; Table 11	Included Attachment 1 Table 11: Key Recent Drivers of Ignitions Probability: 2015 - 2019 (Labeled as Table 3-2)	BVES-43879-J-146	Resubmit report in proper format.
3.3 Recent Use of PSPS over the Last Five Years	Section 3.3; Table 12	Included Attachment 1 Table 12: Recent Use of PSPS: 2015 - 2019 (Labeled as Table 3-3)	BVES-43879-J-146	Resubmit report in proper format.
3.4 Baseline State of Equipment and Wildfire and PSPS Event Risk Reduction Plans	Section 3.4; Table 14	Included Attachment 1 Table 13: Current baseline state of service territory and utility equipment (Labeled as Table 3-4)	BVES-43879-J-146	Resubmit report in proper format.
3.4.1 Current Baseline State of Service Territory and Utility Equipment	Section 3.4.1; Table 14	Included Attachment 1 Table 14: Summary Data on Weather Station Count (Labeled as Table 3-5)	BVES-43879-J-146	Resubmit report in proper format.
3.4.1 Current Baseline State of Service Territory and Utility Equipment	Section 3.4.1; Table 15	Included Attachment 1 Table 15: Summary Data on Fault Indicator Count (Labeled as Table 3-6)	BVES-43879-J-146	Resubmit report in proper format.

3.4.2 Planned Additions, Removal, and Upgrade of Utility Equipment by 3-Year Plan Term	Section 3.4.2; Table 16	Updated and included Attachment 1 Table 16: Location of planned utility equipment additions or removal by end of 3-year plan term (Labeled as Table 3-7)	BVES-43879-G-149	Bear Valley should provide completed Tables 16 and 17 or explain why it could not do so.
3.4.2 Planned Additions, Removal, and Upgrade of Utility Equipment by 3-Year Plan Term	Section 3.4.2; Table 17	Updated and included Attachment 1 Table 17: Location of Planned Utility Infrastructure Upgrades (Labeled as Table 3-8)	BVES-43879-G-149	Bear Valley should provide completed Tables 16 and 17 or explain why it could not do so.
3.4.3 Status Quo Ignition Probability Drivers by Service Territory	Section 3.4.3; Table 18	Included Attachment 1 Table 18: Key Drivers of Ignition Probability (Labeled as Table 3-9)	BVES-43879-J-146	Resubmit report in proper format.
4.1 Objectives of the Plan by Timeline	Section 4.1	Included Attachment 1 instruction box for section 4.1; clarification in supporting narrative text	BVES-43879-J-146	Resubmit report in proper format.
4.2 Understanding Major Trends Impacting Ignition Probability and Wildfire Consequence	Section 4.2	Included Attachment 1 instruction box for section 4.2; restructured plan from Section 3 in the prior version to align with the proper heading.	BVES-43879-J-146	Resubmit report in proper format.
4.2.1 Service Territory Fire-Threat Evaluation and Ignition Risk Trends	Section 4.2.1	Included Attachment 1 instruction box for section 4.2.1; incorporated response from the 2-7-2020 version of Attachment 1 (Tab: Section 4.2.1) embedded within the Plan narrative. Restructured Plan to incorporate service territory description under the appropriate heading.	BVES-43879-J-146	Resubmit report in proper format.
4.2.1 Service Territory Fire-Threat Evaluation and Ignition Risk Trends	Section 4.2.1; Table 19	Included Attachment 1 Table 19: Macro trends impacting ignition probability and/or wildfire consequence Labeled as Table 4-2)	BVES-43879-J-146	Resubmit report in proper format.
4.2.1 Service Territory Fire-Threat Evaluation and Ignition Risk Trends	Section 4.2.1; Table 19	Included Attachment 1 instruction box for the items beneath Table 19; restructured Plan to incorporate ignition probability and risk driver assessment information under the appropriate heading.	BVES-43879-C-136	It is not clear how BVES WMP matches the guidelines. Provide a resubmission that aligns with the structure in the WMP Guidelines or at least a mapping document that highlights all sections in the WMP Guidelines that are not provided in its WMP but included in the MS Excel file.
4.3 Change in Ignition Probability Drivers	Section 4.3	Included Attachment 1 instruction box for Section 4.3; restructured Plan for appropriate headings and added supporting narrative for how the utility sees ignition probability drivers evolving over the next three years.	BVES-43879-J-146	Resubmit report in proper format.
4.4 Directional Vision for Necessity of PSPS	Section 4.4	Included Attachment 1 instruction box for Section 4.4 and incorporated supporting narrative from the prior Attachment 1 workbook. Restructured Plan to include supporting narrative under the appropriate section.	BVES-43879-J-146	Resubmit report in proper format.
4.4 Directional Vision for Necessity of PSPS	Section 4.4; Table 20	Included Attachment 1 Table 20: Anticipated characteristics of PSPS use over next 10 years (Labeled as Table 4-10)	BVES-43879-J-146	Resubmit report in proper format.
5. Wildfire Mitigation Strategy and Programs for 2019 and each year of the 3-year term	Section 5	Restructured narrative segment to preface the mitigation initiatives section of the Plan	BVES-43879-F-134	Utility needs to refile plan in proper format
5.1 Wildfire Mitigation Strategy	Section 5.1	Included Attachment 1 instruction box for Section 5.1; restructured Plan sections to align with mitigation strategy timelines and overview.	BVES-43879-J-146	Resubmit report in proper format.
5.2 Wildfire Mitigation Plan Implementation	Section 5.2	Included Attachment 1 instruction box for Section 5.2; restructured Plan to align information related to 5.2.1, 5.2.2, 5.2.3, and 5.2.3 with the appropriate headings.	BVES-43879-J-146	Resubmit report in proper format.
5.2.4 Utility Data Architecture and Flow	Section 5.2.4	Included supporting data product catalogue/dictionary and historically recorded items the utility uses for WMP initiative and metric tracking.	BVES-43879-J-146	Resubmit report in proper format.
Section 5.3 Detailed Wildfire Mitigation Programs	Section 5.3.1; Table 21	Included Attachment 1 Table 21: Risk Assessment & Mapping with updates for clarity. (labeled as Table 5-5 in the Plan)	BVES-43879-C-137	It is not clear how BVES WMP matches the guidelines. Provide a resubmission that aligns with the structure in the WMP Guidelines or at least a mapping document that highlights all sections in the WMP Guidelines that are not provided in its WMP but included in the MS Excel file.
Section 5.3.2 Situational Awareness and Forecasting	Section 5.3.2; Table 22	Restructured Plan to include supporting situational awareness narrative under the appropriate heading. Included the updated Table 22 (Situational Awareness and Forecasting) into the Plan narrative, labeled as Table 5-6.	BVES-43879-D-138	1) For any cell in Table 22 of Attachment 1 that has "N/A," explain why it is not applicable. 2) For any cell in Table 22 of Attachment 1 that is blank, provide the value or explain why the cell is blank.
Section 5.3.3 Grid Design and System Hardening	Section 5.3.3; Table 23	Restructured narrative segment for all system hardening initiatives under the appropriate heading. Updated and included Table 23: Grid Design and System Hardening in the Plan (labeled Table 5-8).	BVES-43879-G-152	Bear Valley should file an amended Table 23 that includes risk reduction and risk spend efficiencies for all of its grid design and system hardening initiatives.
Section 5.3.4	Section 5.3.4; Table 24	Restructured narrative segment for all related inspection and maintenance information to be under the appropriate heading. Updated and included Table 24: Asset Management and Inspections (labeled Table 5-9).	BVES-43879-H-142	Provide section 5.3.4 explanation of rationale for ignition probability-based inspections which should accompany Table 24
Section 5.3.5	Section 5.3.5; Table 25	Restructured Plan narrative to align vegetation management and inspection activities under the appropriate heading. Updated and included Table 25: Vegetation Management & Inspections (labeled 5-10).	BVES-43879-I-144	1) For any cell in Table 25 of Attachment 1 that has "N/A," explain why it is not applicable. 2) For any cell in Table 25 of Attachment 1 that is blank, provide the value or explain why the cell is blank.
Section 5.3.6	Section 5.3.6; Table 26	Restructured Plan narrative to include appropriate text under the Grid Operations and Protocols section. (included the associated Table 26, labeled as Table 5-14 in the Plan).	BVES-43879-J-146	Resubmit report in proper format.
Section 5.3.7	Section 5.3.7; Table 27	Restructured Plan narrative for appropriate headings. Updated Table 27 for additional detail on availability of information and included in the section.	BVES-43879-K-147	Bear Valley's whole WMP does not follow the guideline structure; if information required by 5.3.7 is available it should be provided in one place instead of directing the reader to different sections of the plan. Bear Valley should also provide an explanation for why the missing data in Table 27 is either unavailable or deemed inapplicable.

Section 5.3.8	Section 5.3.8; Table 28	Included Table 28: Resource Allocation Methodology (labeled as Table 5-16 in the Plan).	BVES-43879-J-146	Resubmit report in proper format.
Section 5.3.9	Section 5.3.9; Table 29	Included instruction box related to Attachment 1 Section 5.3.9; restructured Plan segments to align with headings; updated Table 29 with additional clarification and provided narrative update within the Plan. (Table 29 is labeled as Table 5-18 within the Plan.)	BVES-43879-E-139	1) For any cell in Table 29 of Attachment 1 that has "N/A," explain why it is not applicable. 2) For any cell in Table 29 of Attachment 1 that is blank, provide the value or explain why the cell is blank. 3) For the initiatives outlined in Table 29, please provide a narrative describing how Bear Valley is planning to execute the initiative.
Section 5.3.10	Section 5.3.10; Table 30	Updated and incorporated Table 30: Stakeholder Cooperation and Community Engagement (labeled as Table 5-19) along with timeline implementation detail within the narrative.	BVES-43879-E-140	1) Please explain why Table 30 of Attachment 1 is blank, and provide an updated version with any values available, or explain why a certain cell would be not applicable. 2) For the initiatives outlined in Table 29, please provide a narrative describing how Bear Valley is planning to execute the initiative.
Section 5.4	Section 5.4	Incorporated instruction box related to Attachment 1 Section 5.4 and provided appropriate response	BVES-43879-J-146	Resubmit report in proper format.
Section 5.5	Section 5.5	Incorporated instruction box related to Attachment 1 Section 5.5; restructured Plan narrative, and provided appropriate response for workforce and limited resource concerns.	BVES-43879-J-145	BV needs to provide a description of their plans for workforce and other limited resources
Section 5.6	Section 5.6	Restructured Plan narrative to align with appropriate headings.	BVES-43879-J-146	Resubmit report in proper format.
Section 5.6.1	Section 5.6.1	Restructured Plan narrative to align with appropriate headings. Included instruction box for Attachment 1 Subsection 5.6.1 and bolstered response from the original Attachment 1 workbook. Included Table 31: Change in drivers of ignition probability taking into account planned initiatives, for each year of plan (labeled as Table 5-20).	BVES-43879-G-150	Bear Valley needs to follow the guideline and provide the information pertaining to section 5.6.1 as a narrative in its plan.
Section 5.6.1	Section 5.6.1	BVES has had no reportable ignitions or utility-involved fires and has included this reference text within the Plan narrative.	BVES-43879-G-151	Bear Valley should just confirm that it has not had any ignitions, reportable or not, to alleviate reservations on this requirement.
Section 5.6.2	Section 5.6.2	Included supporting text related to PSPS protocols within the narrative	BVES-43879-J-146	Resubmit report in proper format.
Section 6	Section 6	GIS Availability is addressed in Tab: WSD DR_20200226 and only referenced in the Plan's Section 6 and associated subheadings		