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*California Public Utilities Commission*

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**PUBLIC ADVOCATES OFFICE DATA REQUEST**

**Proceeding: 2021 Wildfire Mitigation Plans**

**No. CalAdvocates-BVES-2021WMP-02**

Date: March 26, 2021

Response requested: March 31, 2021

To: **Paul Marconi**

Bear Valley Electric Service

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Bear Valley Electric Service

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## INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5(e) and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each Data Request prior to providing the response. Identify the person providing the answer to each Data Request and their contact information.

Please send your response to the Originator and e-copies to the following Public Advocates Office representatives:

Henry.Burton@cpuc.ca.gov

Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, **at least** 2 days before the response to the Data Requests is due and provide your best estimate of when the information can be provided. Please identify the person who will be providing the response and their phone number and email address.

Responses should be provided in the original electronic format, if available, and if not available, 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 these Data Requests 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 Requests should be Bates-numbered and, if voluminous, indexed. Responses to Data Requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

For any questions, email the Public Advocates Office contact(s) above with a copy to the Public Advocates Office attorney. If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office **at least** 2 days before the response to the Data Requests is due. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

## DEFINITIONS

- A. As used herein, the terms "you," "your(s)," "Company," 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 these Data Requests 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 these Data Requests 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 these Data Requests.
- 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 these Data Requests.
- H. “Identify”:
  - i. When used in reference to a person, includes stating their full name, most recent known business address and telephone number, and present title or position;
  - ii. When used in reference to documents, includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the person having possession, control or custody of the document, and the general subject matter 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, and analysis known to you which you believe to support the statement, or which you contend to be evidence of the truth or accuracy thereof.
- J. “WMP” means Wildfire Mitigation Plan.
- K. “HFTD” means High Fire-Threat District.
- L. “PSPS” means Public Safety Power Shutoff, or an intentional de-energization event in weather conditions that create high risk of wildfires.
- M. “VM” means vegetation management.
- N. “RFP” means Request for Proposal.

### **DATA REQUESTS**

The following questions relate to BVES’s 2021 Wildfire Mitigation Plan (WMP) Update (hereinafter 2021 WMP or 2021 WMP update).

#### **Question 1**

On page (p.) 16 of BVES’s 2021 WMP, in Table 3.1.1-1, there are several significant differences between planned and actual 2020 expenditures.

- a) Situational Awareness: Planned 2020 expenditures were \$337,000; actual 2020 expenditures were \$66,218. Please explain this difference.
- b) Grid Operations: Planned 2020 expenditures were \$42,000; actual 2020 expenditures were \$0. Please explain this difference.
- c) Emergency Planning: Planned 2020 expenditures were \$200,000; actual 2020 expenditures were \$50,676. Please explain this difference.

#### **Question 2**

On p.22, Supporting Table 4.2-1 includes columns for “Vegetation Density” and “Wind Intensity.”

- a) What are BVES’s criteria for high, medium, and low Vegetation Density?
- b) What are BVES’s criteria for high, medium, and low Wind Intensity?
- c) How were the criteria described in parts (a) and (b) developed?

#### **Question 3**

On p. 34, Supporting Table 4.3-2 shows the 10 year fire risk reduction outlook for each of BVES’s circuits. Many cells have negative numbers for “Wildfire Risk Group” and “Overall Risk Weighting.”

- a) Please explain in detail how “Wildfire Risk Group” is calculated or determined.

- b) Please explain in detail how “Overall Risk Weighting” is calculated or determined.
- c) What does a negative number represent in “Wildfire Risk Group”?
- d) What does a negative number represent in “Overall Risk Weighting”?

#### **Question 4**

On p. 96, under section 7.2 B “Identifying and Correcting Deficiencies in the Plan,” BVES mentions internal audits.

- a) Please describe BVES’s process for performing an internal audit. If this varies by topic or program area, please describe each audit process that BVES currently employs.
- b) How often are internal audits performed? If this varies by topic or program area, please describe the frequency for each type of audit.
- c) Please provide a list of all audits of WMP processes that BVES conducted in 2019 and 2020. For each audit, summarize any findings and any corrective actions BVES took to remediate those findings.

#### **Question 5**

P. 100 states, “During 2021, BVES will engage a consulting firm to begin the development of a series of risk maps that will show the overall ignition probability and estimated wildfire consequence along electric lines and equipment.”

- a) Has BVES identified a consultant (or consultants) to develop these models?
- b) If the answer to part (a) is yes, please list the consultants.
- c) Please provide a copy, if existing, of an RFP or other set of requirements BVES produced in regards to these risk maps.

#### **Question 6**

P. 105 states, “BVES plans to continue to implement grid automation into its system which includes the installation of a fiber optic network throughout the service area . . .”

- a) Why did BVES select fiber optic cable over other methods such as wireless communications?
- b) How will the fiber optic network be installed? For example, will the fiber optic be buried, or run from pole to pole in conjunction with conductor, or some other method?
- c) What are BVES’s projected expenditures related to installing this fiber optic network across its service area?
- d) What is BVES’s projected timeline for installing this fiber optic network across its service area?

### **Question 7**

On p. 115, BVES states that it plans to install approximately 4.3 miles per year of covered conductor on 34.5 kV sub-transmission.

- a) Please clarify whether these 4.3 miles refer to line miles or circuit miles (as defined in the glossary on pages 1 and 4 of BVES's 2021 WMP update).
- b) In 2020, what were BVES's total expenditures related to covered conductor installation on 34.5 kV sub-transmission?
- c) In 2020, how many circuit miles of covered conductor did BVES install on 34.5 kV sub-transmission?
- d) For 2021, what are BVES's total projected expenditures related to covered conductor installation on 34.5 kV sub-transmission?
- e) For 2021, how many circuit miles of covered conductor does BVES project installing on 34.5 kV sub-transmission?

### **Question 8**

On p. 115, BVES states that it plans to install approximately 8.6 miles per year of covered conductor on 4 kV distribution.

- a) Please clarify whether these 8.6 miles refer to line miles or circuit miles (as defined in the glossary on pages 1 and 4 of BVES's 2021 WMP update).
- b) In 2020, what were BVES's total expenditures related to covered conductor installation on 4 kV distribution?
- c) In 2020, how many circuit miles of covered conductor did BVES install on 4 kV distribution?
- d) For 2021, what are BVES's total projected expenditures related to covered conductor installation on 4 kV distribution?
- e) For 2021, how many circuit miles of covered conductor does BVES project installing on 4 kV distribution?

### **Question 9**

For the following programs, please provide a workplan that shows which circuits BVES plans to treat with that program in 2021, and the amount of work to be conducted on each circuit.

- a) Covered conductor installation.
- b) Tree attachment removal.
- c) Pole loading assessment and remediation.

### **Question 10**

On p. 125, in regard to its vegetation management contractor, BVES states, “The contractor’s work is subject to BVES Quality Control checks.”

- a) Please describe BVES’s process for Quality Control checks as it applies to its vegetation management contractor(s), including whether it includes inspecting the contractor’s tree trimming work after completion.
- b) List the three most common findings BVES’s Quality Control checks found with its VM contractor in 2019.
- c) List the three most common findings BVES’s Quality Control checks found with its VM contractor in 2020.
- d) Who performs these Quality Control checks?
- e) How often are these Quality Control checks implemented?
- f) Does BVES have a regular schedule for Quality Control checks or are they conducted on an as-needed basis?

### **Question 11**

On p. 63, in Table 5.3-1, in regards to quality assurance / quality control (QA/QC) of inspections, BVES lists a projected target of 100% by the end of 2022, and states, “BVES is able to implement Inspection QC program in 2022.”

- a) Does BVES currently have any QA/QC processes in place for asset inspections?
- b) If the answer to part (a) is yes, please describe these processes, including who performs them and how frequently.
- c) Does BVES currently plan to implement any QA/QC processes for asset inspections in 2021 (aside from those described in your responses to parts (a) and (b) of this question)?
- d) If the answer to part (c) is yes, please describe these processes, including who will perform them and how frequently.
- e) Please describe the processes that BVES plans to have in place by the end of 2022 to perform QA/QC per Table 5.3-1, quoted above.

### **Question 12**

In its *Reply Comments to Cal Advocates Comments on Bear Valley Electric Service, Inc. 2020 Wildfire Mitigation Plan*, submitted on October 26, 2020, BVES stated, “BVES agrees to include its Radford Line re-energization inspection plan in its 2021 WMP update.”

Cal Advocates was not able to locate this plan in the 2021 WMP update. Please provide the appropriate page numbers in the 2021 WMP update, or a copy of the Radford Line re-energization inspection plan.

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**END OF REQUEST**