



Public Advocates Office
California Public Utilities Commission

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PUBLIC ADVOCATES OFFICE DATA REQUEST

Proceeding: 2021 Wildfire Mitigation Plans

No. CalAdvocates-BVES-2021WMP-04

Date: March 31, 2021

Response requested: April 6, 2021

To: **Paul Marconi**

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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

Page (p.) 113 of BVES’s 2021 WMP states, “BVES has evaluated 2,703 poles since 2018 (191 in 2020); 1,155 failed the inspection criteria; 751 poles were replaced and 113 remediated. Corrective action for the remaining poles that failed inspection is being undertaken.”

This statement indicates that 291 poles have not been remediated yet as a result of assessments performed from 2018 through 2020.

- a) How many of the 291 poles awaiting remediation failed the inspection criteria in 2018?
- b) How many of the 291 poles awaiting remediation failed the inspection criteria in 2019?
- c) How many of the 291 poles awaiting remediation failed the inspection criteria in 2020?
- d) Please provide an estimated date for when the 291 poles will be fully replaced or remediated.
- e) Does BVES have an estimate of the ignition risk due to a pole that has failed inspection criteria? Please describe if so.

Question 2

Per Table 3, line 12, BVES assessed 924 poles in 2018, 1,588 poles in 2019, and 191 poles in 2020.

- a) Please explain why BVES performed far fewer pole assessments in 2020 compared to either 2018 or 2019.
- b) Please describe the difference between pole assessments and intrusive pole inspections (line 32 of Table 3).

Question 3

Per Table 3, row 32, BVES performed nearly 1,000 intrusive pole inspections per year in 2015 through 2017, 155 intrusive pole inspections in 2018, 48 in 2019, and 0 in 2020.

- a) Please explain why BVES performed considerably fewer intrusive pole inspections each year in the 2018-2020 period compared to 2015-2017.
- b) Please explain the reason for the decreasing trend in the number of intrusive pole inspections performed from 2018 through 2020.
- c) Why did BVES perform no intrusive pole inspections in 2020?
- d) How many intrusive pole inspections does BVES plan to perform in 2021? Please include inspections already performed in 2021.
- e) Can BVES confirm that, as of January 1, 2021, all poles in BVES's territory are compliant with intrusive pole inspection schedules required by General Order 165?

Question 4

Per Table 7.1, row 54, BVES had 9 outages in 2020 due to "Lightning arrestor damage or failure-Distribution." Prior to 2020, BVES reports 0 outages due to this cause for all reporting years.

- a) What factors contributed to an increase in outages due to lightning arrestor damage or failure in 2020?
- b) What actions has BVES taken to mitigate further outages due to this cause?

Question 5

Per Table 4-4 on pp. A-187 and A-188 of BVES's Public Safety Power Shutoff Plan, BVES will initiate a PSPS event if actual sustained wind or 3-second wind gusts exceed 55 mph, and the NFDRS rating is brown, orange, or red.

- a) Please state the basis for choosing the threshold of 55 mph.
- b) In 2020, how many days did wind speeds along one or more of BVES's circuits exceed 55 mph?
- c) On the days in part (b), did BVES observe any damage to its assets following the high wind conditions?
- d) In 2020, how many days did wind speeds along one or more of BVES's circuits equal or exceed 45 mph?
- e) Please disaggregate the days in part (c) by the NFDRS rating on the days when the wind speeds equaled or exceeded 45 mph.
- f) Were there any days in 2020 when BVES considered itself on "PSPS Watch" where a PSPS event would be necessary if conditions worsened?

- g) If the answer to part (f) is yes, please list for each day: the date, the maximum wind speed, the NFDRS rating, and whether any damage to BVES assets was found following the high wind conditions.

Question 6

p. 120 states, with regard to BVES’s infrared inspections, “BVES completed a full survey of its overhead facilities using these methods in 2019.”

Table 24 of BVES’s 2020 WMP refile states, on p. 151, that BVES performed infrared inspections on 70.27 line miles in 2019.

- a) Please explain the apparent discrepancy between the two statements listed above.
- b) In 2019, on how many overhead circuit miles (as defined in the glossary on page 1 of BVES’s 2021 WMP update) did BVES perform infrared inspections?

Question 7

p. 120 states, with regard to BVES’s infrared inspections, “BVES completed a full survey of its overhead facilities using these methods in 2019. The number of problem areas identified were few and minor. As a result, BVES determined to pause this program and conduct it every 5 years.”

- a) Did BVES perform the 2019 infrared survey under peak summer/fall loading conditions?
- b) Please provide the specific date(s) the 2019 infrared survey was performed.
- c) How many level 1 findings resulted from the 2019 infrared survey?
- d) How many level 2 findings resulted from the 2019 infrared survey?
- e) How many level 3 findings resulted from the 2019 infrared survey?
- f) Was the Radford Line energized and included in the 2019 infrared survey?
- g) Did BVES perform an infrared survey in 2020? If so, please answer parts (a) through (f) for the 2020 survey.

END OF REQUEST