



August 5, 2026

Dear Stakeholders,

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Annual Performance Report regarding Bear Valley Electric Service, Inc.'s execution of its 2024 Wildfire Mitigation Plan.

This Annual Performance Report is published as of the date of this letter. Bear Valley Electric Service, Inc. may, if it wishes to do so, file a public response to this Annual Performance Report within 14 calendar days of the date of publication. Comments must be submitted to Energy Safety's E-Filing system in the 2024 Annual Performance Report docket.¹

Sincerely,

/s/ Patrick Doherty

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¹ Submit responses to the [2024-APR](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR) docket via the Office of Energy Infrastructure Safety's E-Filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR>



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
2024 ANNUAL PERFORMANCE
REPORT
BEAR VALLEY ELECTRIC SERVICE, INC.

August 2026

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Executive Summary

Energy Safety's primary objective is to ensure that electrical corporations reduce wildfire risk and adhere to their approved Wildfire Mitigation Plans (WMPs), which are annually filed pursuant to Public Utilities Code (PUC) section 8385 *et seq.* Energy Safety's annual performance report of Bear Valley Electric Service, Inc. (BVES) is a comprehensive assessment of the implementation of its 2024 WMP and its catastrophic wildfire risk reduction initiatives.

BVES completed 64 of 68 of its WMP initiatives in 2024 (94%), a 9% improvement over its 2023 performance, and had no wildfire ignitions in 2024 for the eighth consecutive year. Energy Safety did not find any systemic issues that hindered BVES's ability to implement its WMP adequately in 2024.

Energy Safety did identify several areas for improvement:

- BVES failed to fund five of the 10 initiatives with the largest proposed expenditures, and spent below the total proposed amount on its 2024 WMP initiatives by \$13.3 million, or 31% of the overall budget. In the absence of identifying and implementing much more cost-efficient ways to reduce risk, this magnitude of underspending is a major concern.
- Of the four initiatives BVES failed to complete in 2024, two were also not completed in 2023 (upgrades to the Maltby and Lake substations). The continuing failure to meet targets for these initiatives suggests that they are not being prioritized appropriately.
- BVES has not demonstrated a meaningful reduction in wire down events, a significant wildfire-related risk event.
- BVES could improve data reporting performance on proposed spending, Quality Assurance and Quality Control program maturity, and initiative attainment. Accurate and timely data is essential for monitoring and improving performance.
- Energy Safety's assessment of BVES's performance revealed instances where BVES failed to foresee and disclose planning constraints that resulted in missed initiative targets. Energy Safety expects more transparency from BVES regarding its work loading and planning constraints to execute on its WMP commitments.

1. Introduction

Energy Safety's primary objective is to ensure that electrical corporations reduce wildfire risk and adhere to their approved Wildfire Mitigation Plans (WMPs).¹ This Annual Performance Report (APR) presents the Office of Energy Infrastructure Safety's (Energy Safety's) statutorily mandated assessment of Bear Valley Electric Service, Inc.'s (BVES's) performance with its 2024 targets for initiatives and objectives in its 2023-2025 Base Wildfire Mitigation Plan (2023-2025 Base WMP). While the 2023-2025 Base WMP considers activities over a three- and 10-year horizon, this report only addresses targets established for initiatives and objectives to be executed in 2024. Therefore, this report uses the term "2024 WMP" to refer to portions of the 2023-2025 Base WMP addressed by this report.

In the sections that follow, Energy Safety describes the statutory and regulatory basis for its reporting, the 2024 WMP, the information supplied by BVES, the independent evaluation conducted by a third-party independent evaluator that examined BVES's implementation of its 2024 WMP. Finally, Energy Safety provides its conclusions and recommendations for further actions by BVES.

2. Performance Assessment Process

The statutory objective of electrical corporation wildfire mitigation planning efforts is to ensure that electrical corporations are constructing, maintaining, and operating their infrastructure in a manner that will minimize the risk of catastrophic wildfire.²

Government Code section 15475(b)(2) directs Energy Safety to develop performance metrics to achieve maximum feasible risk reduction to be used to develop the wildfire mitigation plan and evaluate an electrical corporation's performance relative to the implementation of that plan.

In this report, Energy Safety considers the totality of all performance assessments completed with respect to BVES's 2024 WMP. This includes all inspection, audit, investigation, and data assessment work performed by Energy Safety, as applicable, as well as separate electrical corporation and independent third-party evaluations of implementation.

The following is an overview of the five dimensions of performance assessed by Energy Safety:

¹ Government Code Section 15475.1(a).

² Pub. Util. Code section 8386(a).

1. Energy Safety assessed *2024 WMP attainment performance* by determining whether the electrical corporation met the 2024 WMP targets for initiatives and objectives, looking specifically at whether the electrical corporation funded and performed the work stated for each initiative, and by performing field inspections of WMP work claimed to be completed by BVES,
2. Energy Safety assessed *ignition risk performance* by tracking ignition rates, wire down rates, and unplanned outage rates – all indicators of ignition risk,
3. Energy Safety assessed *public safety power shut-off (PSPS) performance* by tracking the frequency, scope, duration and impact of PSPS events,
4. Energy Safety assessed *outcome metric performance* by tracking the number of acres burned, number of buildings damaged or destroyed, number of fatalities or injuries, and total value of assets lost due to wildfires ignited by BVES's equipment, and
5. Energy Safety assessed *data accuracy and completeness performance* by crosschecking data from various utility reporting mechanisms, assessing the accuracy of data submitted by BVES of its WMP work, reviewing multiple reports, reviewing a formal quality assurance and quality control evaluation, and identifying issues encountered during the performance assessment process.

3. BVES 2024 Wildfire Mitigation Plan

BVES submitted a comprehensive WMP in 2023 covering a three-year term from 2023 through the end of 2025.³ Energy Safety approved BVES's 2023-2025 Base WMP on November 6, 2023.⁴ For the purpose of this report, Energy Safety refers to the 2023-2025 Base WMP, any approved Change Order Requests, as well as the 2024 targets and initiatives, collectively as the 2024 WMP.

BVES's 2024 WMP highlighted past and ongoing efforts to address wildfire risk and reduce the impacts of PSPS events.⁵ The 2024 WMP described 68 initiatives, which are divided up into six categories and summarized here:

1. Grid Design, Operations and Maintenance: BVES committed to replace 12.9 circuit miles of bare conductors with covered conductors in the highest risk areas and harden 500 poles located in main evacuation routes. BVES also prioritized the automation of substations, switches, and field devices, and the development of the Bear Valley Solar

³ 2023-2025 Base WMP.

⁴ 2023-2025 Base WMP Approval.

⁵ 2023-2025 Base WMP, p. 20-22.

& Energy Storage Project. Finally, BVES stated its intention to continue its asset inspection routine of annual detailed inspections, patrol inspections, LiDAR surveys, unmanned aerial vehicle high-definition photography and thermography, third party ground patrols, intrusive pole testing, and substation inspections.

2. Vegetation Management and Inspections: BVES committed in its WMP to clear vegetation from 72 circuit miles and 13 substations, and to remediate or remove 88 trees to prevent fall-in. BVES also prioritized resolving all open work orders within the timeframe established by General Order 95, as well as inspecting 51 miles through detailed inspections and 205 miles through patrol inspections.
3. Situational Awareness and Forecasting: BVES's goals included continued improvement of near-real-time fire risk assessment applications and weather stations, improving coordination and communication with stakeholders, and employing forecasting capabilities through fire predictive live models.
4. Emergency Preparedness: BVES committed in its 2024 WMP to improve staff training on emergency and disaster response plans, as well as to increase coordination with community stakeholders in emergency response.
5. Community Outreach and Engagement: BVES included in its 2024 WMP the improvement of public outreach and education awareness programs for wildfires, as well as the improvement of BVES engagement with Access and Functional Need (AFN) customers, through the evaluation of the effectiveness of outreach efforts.
6. Overview of the Service Territory: BVES committed in its 2024 WMP to procedural transparency and readiness in managing environmental and safety compliance and to allow for the tracking of permitting costs through initiative ST-1, Environmental Compliance and Permitting.

The 2024 WMP also contained three- and ten-year objectives.

Selected three-year objectives include:⁶

- Replace all sub-transmission (34.5 kV) overhead bare conductors with covered conductors.
- Harden secondary evacuation routes in the highest risk areas.
- Upgrade highest risk substations.

Selected ten-year objectives include:⁷

- Replace all high and medium risk distribution (4 kV) overhead bare wires.
- Automate remaining substations, switches, field devices, and fuse TripSavers to connect to Supervisory Control and Data Acquisition (SCADA) equipment.

⁶ 2023-2025 Base WMP, p. 8.

⁷ 2023-2025 Base WMP, p. 9.

- Assess emerging technologies aimed at early detection of asset degradation, wire down detection, and other ignition prevention and mitigation technologies.

Of particular importance are the following objectives which have targets or goals for 2024:

- The completion of 2.7 circuit miles of covered conductor and replacement of 70 poles as part of the Radford Line Replacement Project.
- The inspection of 205 circuit miles, 850 poles, and 144 substations.⁸
- The automation of three substations, 10 switches and field devices, six capacitor banks, and 50 TripSavers.

Descriptions of the activities and objectives of the programs and initiatives contained in BVES's 2024 WMP are listed in the table in Appendix A.

4. BVES Annual Report on Compliance

Public Utilities Code section 8386.3(b)(1) directs electrical corporations to file a self-evaluation report addressing the electrical corporation's implementation of its approved plan during the prior calendar year. This document is known as the Electrical Corporation Annual Report on Compliance (EC ARC).

Energy Safety's Compliance Guidelines outlined the requirements for an EC ARC prepared to address the 2024 calendar year and filed by the electrical corporation in early 2025. The EC ARC was required to detail the electrical corporation's self-assessment of its performance with the 2024 WMP during 2024.⁹

BVES submitted its EC ARC to Energy Safety on April 1, 2025.¹⁰ The EC ARC is considered by Energy Safety as well as by the independent evaluator in its assessment of BVES's WMP performance or evaluation of WMP implementation, respectively. For a summary of the EC ARC information on initiative completion and actual spending, see the table in Appendix A.

⁸ 2023-2025 Base WMP, p. 121-122.

⁹ 2024 Compliance Guidelines.

¹⁰ EC ARC.

5. Independent Evaluator ARC for BVES

Energy Safety, in consultation with the Office of the State Fire Marshal, annually publishes a list of entities qualified to serve as independent evaluators of WMP compliance.¹¹ Each electrical corporation is then required to hire an independent evaluator (IE) from the list of approved evaluators to perform an annual independent WMP compliance evaluation.¹²

The IE reviews and evaluates the electrical corporation's compliance with its approved WMP. As part of its evaluation, the IE must investigate instances of large deviation in actual expenditure greater than 10% as compared to the proposed expenditure amount in the associated WMP.

The 2024 Independent Evaluator Annual Report on Compliance (IE ARC) for BVES was prepared by Bureau Veritas North America, Inc. The IE ARC included a review of the wildfire mitigation initiatives and activities implemented in 2024, and an accounting of whether BVES met its performance targets, deviated from its budget, and followed its quality assurance and quality control (QA/QC) processes.

The IE utilized a variety of techniques to evaluate BVES's progress toward meeting its 2024 WMP commitments, such as inspecting a sample of BVES's field-verifiable 2024 WMP initiatives, performing desk reviews of non-field verifiable initiatives, interviewing selected utility staff, and reviewing the 2024 WMP and 2024 EC ARC.¹³ The IE evaluated a total of 69 initiatives with targets.¹⁴ The IE ARC includes sample verification statistics, an opinion on initiative completions, and actual expenditure estimates for each initiative.¹⁵

The IE ARC identified three of those 69 initiatives (4%) as incomplete.¹⁶ The IE ARC findings are summarized by initiative in Appendix A. The IE concluded that BVES demonstrated a strong commitment to the WMP and has made meaningful progress in achieving the objectives and goals outlined for 2024.¹⁷

The IE ARC identified the same initiatives with missed targets as the EC ARC, except for the following initiative:

¹¹ Pub. Util. Code Section 8386.3(b)(2)(A).

¹² Pub. Util. Code Section 8386.3(b)(2)(B)(i).

¹³ IE ARC, page 7.

¹⁴ The discrepancy between the 68 initiatives evaluated by Energy Safety and the 69 initiatives evaluated by the IE comes from the IE's exclusion of G_22, and the inclusion of RMA_1, and SAF_4.; BVES IE ARC Appendix 7.1.

¹⁵ BVES IE ARC Appendix 7.1.

¹⁶ IE ARC, pages 11, 45-49, and 55-56.

¹⁷ IE ARC, page 151.

Safety and Technical Upgrades to Lake Substation – GD_23: According to the IE ARC, no progress has been made on the project, and BVES did not meet the 64% project completion threshold. BVES failed to include this initiative in its 2024 Assessment Report of WMP Initiative Targets.¹⁸ Further review by the IE reveals that BVES faced planning constraints and supply chain-related delays, leading it to request an amendment to the completion year for this initiative.

As a result of the evaluation conducted, the IE provided observations on BVES in certain areas:

1. Data collection: BVES should look to include more comprehensive information on the detailed inspections report such as geolocation, specific findings, pictures, risk rankings, target completion date, and scope of work needed. For future WMP cycles, it is essential that BVES submit any existing reports with this level of detail.
2. Evaluation of community outreach programs: BVES should enhance its methods for assessing the impact of communication on community awareness and behavior change, by implementing a research and analytics report.

Finally, the IE reviewed BVES's QA/QC processes, assigning scores from 0 to 4 for five QA/QC Maturity Model metrics (Figure 1). For a full description of the QA/QC Maturity Model, see the IE ARC Outline and the IE ARC.^{19, 20}

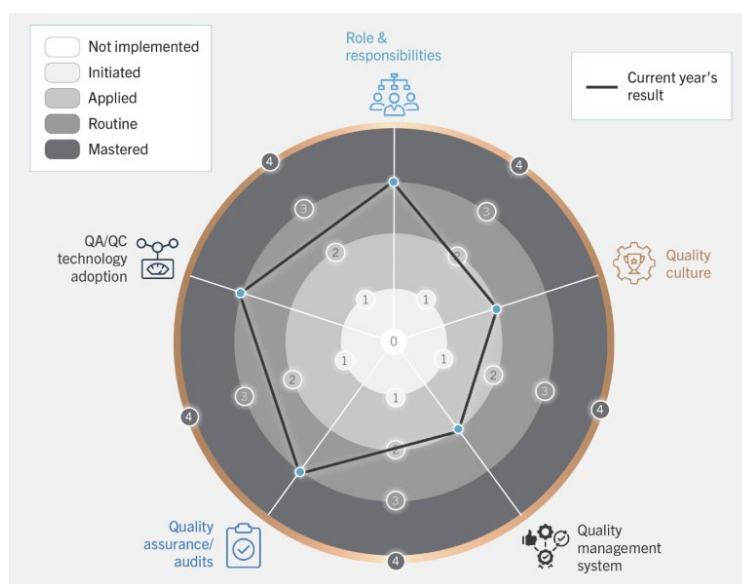
In the IE ARC, the IE concluded that BVES had a well-developed and documented QA/QC process for WMP initiative completion. The IE also included one recommendation for BVES to improve its existing QA/QC procedures. Under the Roles and Responsibilities section, the IE recommended developing a standardized, documented escalation protocol to avoid relying on verbal communication for QA/QC matters and to enable formal accountability tracking.

¹⁸ EC ARC, page 11.

¹⁹ IE ARC Outline, p, 24.

²⁰ IE ARC, pages 146-150.

Figure 1. Radar Plot of QA/QC Maturity Model for BVES Reproduced from IE ARC²¹



6. WMP Initiative Attainment Performance

Energy Safety's assessment of BVES's performance in 2024 indicates that BVES attained 64 (94%) of its 68 targets for its 2024 WMP initiative activities. This is 9% higher than its completion percentage in 2023.²² The subsections below describe Energy Safety's assessment of BVES's 2024 WMP implementation.

Section 6.1 provides an overview of the 2024 WMP initiatives assessed for attainment by Energy Safety. Section 6.2 describes the vegetation management assessments performed by Energy Safety. Section 6.3 provides an overview of Energy Safety's field inspection activities related to BVES's 2024 WMP work, including inaccuracies in BVES's data regarding completed WMP work. Section 6.4 summarizes the initiatives with missed targets, if any, and provides three perspectives on the impact of BVES's failure to meet some of its 2024 WMP targets: percentage of completion, budget impacts, and risk reduction impacts. Finally, Section 6.5 provides an overview of the 2024 WMP proposed expenditures and compares them to the actual expenditures. Altogether, Section 6 characterizes BVES's performance with respect to its 2024 WMP initiative attainment. Additional performance assessments appear in Sections 7 through 10.

²¹ IE ARC, page 150.

²² 2023 ARC, page 1.

6.1 BVES 2024 WMP Initiative Activities Assessed by Energy Safety

Energy Safety assessed WMP attainment performance on 68 wildfire mitigation initiatives from the 2024 WMP.²³ The initiatives are grouped into six main categories:

1. Grid Design, Operation, and Maintenance with 35 initiatives assessed and an associated proposed expenditure of approximately \$39.0 million.
2. Vegetation Management and Inspections with 18 initiatives assessed both in the Vegetation Management Audit (VMA) Report and in this APR, and a proposed expenditure of approximately \$3.1 million.²⁴
3. Situational Awareness and Forecasting with five initiatives assessed and a proposed expenditure of \$170,262.
4. Emergency Preparedness with five initiatives assessed and a proposed expenditure of \$40,582.
5. Community Outreach and Engagement with four initiatives assessed and a proposed expenditure of \$162,150.
6. Overview of the Service Territory with one initiative assessed and a proposed expenditure of \$25,400.

A complete list of initiatives along with expenditure information appears in the table in Appendix A.

The initiative performance assessment process included comparing the actual initiative completion as reported to Energy Safety by BVES in its quarterly data report (QDR) and in its EC ARC, and as reported by the IE in the IE ARC.²⁵ The information from each of these sources is summarized along with the final assessment of performance for each initiative in the table in Appendix A. In some cases, Energy Safety issued data requests to answer specific questions. If data request information is used in the assessment, a citation for the particular instance is provided. Statistics and findings from Energy Safety field audits for 2024 WMP work are also considered. Finally, the Energy Safety VMA Report also contributed to Energy Safety's APR assessment.²⁶

²³ 2023-2025 Base WMP, pages 115, 121, 190, 192, 230, 259, and 347-348.

²⁴ For more information on the VMA Report, see Section 6.5 and Appendix B.

²⁵ 2024 Q4 QDR, Table 11; EC ARC, pages 11-13; and IE ARC, pages 20, 91, 118, 130, 138.

²⁶ VMA Report, page 5.

6.2 Energy Safety Vegetation Management Audit Report

Each performance year, Energy Safety completes an audit of the vegetation management work performed by, or on behalf of, an electrical corporation as described in its approved WMP (the Vegetation Management Audit (VMA)).²⁷ In the VMA, Energy Safety assesses completeness of each qualitative commitment and quantitative target associated with each initiative from the electrical corporation's approved WMP. The VMA issues findings on the initiative level, as defined in Appendix A of the 2023-2025 Wildfire Mitigation Plan Technical Guidelines.²⁸

The VMA is sent to the electrical corporation, which then has the opportunity to provide Energy Safety with a corrective action plan (CAP) to address any deficiency identified in the VMA. Energy Safety assesses the CAP and issues a VMA Report that documents any outstanding deficiencies and describes the electrical corporation's overall program performance for that year.

For performance year 2024, Energy Safety issued its VMA to BVES on October 24, 2025,²⁹ received a CAP on December 5, 2025,³⁰ and issued the 2024 VMA Report on February 13, 2026.³¹

This APR reproduces the VMA Report conclusions. Rather than referencing each vegetation management initiative number it references WMP initiatives to allow for consistency throughout the APR. The Table 10 of Appendix B provides a crosswalk between the 13 vegetation management initiative numbers included in the VMA Report to the 18 WMP vegetation management initiatives referenced in this report.

Energy Safety's VMA Report concluded that BVES successfully achieved the objectives of its vegetation management program by either completing all work associated with its WMP commitments or by providing a CAP that addressed any deficiencies identified in the VMA.

Overall, BVES has demonstrated continued improvement in its vegetation management programs through corrective actions to address deficiencies identified in Energy Safety's 2023 and 2024 Vegetation Management Audit. Specifically, BVES has committed to actions that will mature its pole clearing program. BVES will clear vegetation from the base of all poles located in the State Responsibility Area that have not been replaced since 2016 and will treat these poles as having Public Resource Code section 4292 non-exempt equipment unless and until field verification confirms otherwise. BVES has also updated its internal procedures

²⁷ Pub. Util. Code section 8386.3(b)(5)(A).

²⁸ WMP Technical Guidelines, pages. A-24-A-26.

²⁹ VMA Report.

³⁰ BVES 2024 VMA CAP Response.

³¹ VMA Report.

with defined timeframes that enable BVES to prioritize and complete vegetation management work orders in a manner that emphasizes the timely mitigation of ignition risks, consistent with available resources.

The specific findings from Energy Safety's VMA Report are summarized in Appendix B.

6.3 Energy Safety Field Inspection Assessment

Energy Safety regularly performs field audits of the WMP work reported as complete by the electrical corporations.

When performing a field audit, Energy Safety conducts two types of inspections: 1) inspections of grid hardening, vegetation management, and other work related to WMP initiatives, and 2) inspections of general wildfire safety (GWS) conditions at an inspection site. The second category of general wildfire safety conditions is not strictly related to WMP initiatives, and these inspections are additional to Energy Safety's WMP initiative-related inspection work.³²

6.3.1 Inspection and Notice Counts

For field audits of 2024 WMP work, inspections that found instances of non-performance on WMP initiative work resulted in a notice of violation, a notice of non-performance, or a notice of data inaccuracy.³³ Inspections of infrastructure or vegetation management that resulted in identification of GWS conditions resulted in the issuance of a wildfire safety concern (WSC).³⁴ An overview of the counts of inspections and notices by initiative appears in Table 1.

³² If Energy Safety observes a general wildfire safety concern during an inspection activity, that is recorded as a "Wildfire Safety Concern." Or as it was known prior to 2024, a "defect."

³³ If Energy Safety observes non-performance of a WMP initiative during an inspection activity that an electrical corporation claimed to have occurred at a site, then that is recorded as a "deficiency" and may be the subject of a "Notice of Non-Performance" or a "Notice of Data Inaccuracy" sent to the electrical corporation. Prior to SB 254, Energy Safety issued Notices of Violation, which could be issued due to completeness or data accuracy issues.

³⁴ As they are not related a WMP performance issue, statistics on wildfire safety concerns are not provided in this report.

Table 1. Energy Safety Inspection Counts and Notices by Initiative

2024 WMP Initiative	Number of Inspections	Notices of Violation	Notices of Non-Performance	Total
Evacuation Route Hardening 8.1.2.3 GD_6	23 inspection points	0	1 (Completeness)	1
Enhanced Vegetation Management Program - Clearance 8.2.3.3 VM_9	263 inspection points	1 (Protocol Adherence)	0	1

6.3.2 Data Accuracy and Completeness Issues Observed by Field Audits

As described above, Energy Safety issued two notices to BVES upon inspection of its 2024 WMP work, one of them related to completeness issues, and the other related to an adherence to protocol violation.^{35,36} Energy Safety did not observe data accuracy issues in BVES's territory in the course of field audits.

Completeness issues are instances where the WMP work claimed to have been completed at a location was done in an incomplete manner, while adherence to protocol violations are instances where the WMP work failed to comply with the protocols established in the EC's WMP. Under any of these two circumstances, the work claimed should not have been counted by the electrical corporation as "complete" WMP work.

The existence of these issues in the spatial QDR submissions of an electrical corporation calls into question the reliability of the electrical corporation's claimed completion of WMP work. For example, if an electrical corporation claims to have completed 100 units of a type of WMP work, but Energy Safety inspectors discover issues with specific instances of the work reported, then the claim that 100 units were completed is unreliable.

³⁵ Notice of Non-Performance.

³⁶ Notice of Violation.

In the case of BVES’s 2024 WMP work, Energy Safety’s field audits observed completeness and adherence to protocol issues with the work claimed as completed under the following two WMP initiatives: Evacuation Route Hardening (GD_6) and Clearance (VM_9).

The Table 2 below describes the numbers of points or miles inspected by Energy Safety for the 2024 WMP work reported by BVES as completed for each of the relevant WMP initiatives, and the number of points or miles with data accuracy or completeness or adherence to protocol issues. A percentage of the 2024 WMP work reported by BVES as complete with those issues is also described.

Table 2. Energy Safety Inspection Counts and Data Accuracy and Completeness Issues, with Percentage of Inspections Where Issues were Observed

Initiatives with Data Accuracy and Completeness Issues	Number of Points or Miles Inspected	Total Points or Miles With Issues	Percentage of Points or Miles with Issues
Evacuation Route Hardening 8.1.2.3 GD_6	23 inspection points	1	4.3%
Clearance 8.2.3.3 VM_9	263 inspection points	1	0.4%

The electrical corporation must demonstrate that it met its WMP targets. Because Energy Safety’s field audit of BVES’s 2024 WMP work observed issues with the data reported by BVES on its 2024 WMP initiative work, there remains uncertainty about the amount of work that BVES actually completed. Energy Safety’s estimates of the actual work BVES completed, accounting for this uncertainty, may be found in Table 3.

Table 3. Energy Safety Estimates of Data Accuracy and Completeness Issues

Initiatives with Data Accuracy and Completeness Issues	2024 WMP Target	Actual Points or Miles Completed as Reported by BVES ³⁷	Percentage of Points or Miles with Issues	Reliable Actual Points or Miles
Evacuation Route Hardening 8.1.2.3 GD_6	500 poles	1,095 poles	4.3%	1,048 poles
Clearance 8.2.3.3 VM_9	72 circuit miles	99.5 circuit miles	0.4%	99.1 circuit miles

Despite receiving two notices from Energy Safety regarding incomplete or nonconforming work, BVES’s overall target attainment remained unaffected. According to BVES’s fourth quarter (Q4) 2024 QDR, the electrical corporation exceeded its 2024 WMP targets for both initiatives.

For Evacuation Route Hardening (GD_6), BVES’s 2024 target was 500 poles, and its 2024 attainment was 1,095 poles.³⁸ Even after discounting 4.3% of the points, Energy Safety finds that BVES met its target for this initiative.

For Clearance (VM_9), BVES’s 2024 target was 72 circuit miles, and its 2024 attainment was 99.5 circuit miles.³⁹ Even after discounting 0.4% of the points, Energy Safety finds that BVES met its target for this initiative.

³⁷ Q4 2024 QDR.

³⁸ Appendix A. Notably, the IE ARC found that BVES only reported 929 pole locations to it for this initiative, and consequently the IE could only verify that number through field sampling of the 929 locations. In light of this inconsistent reporting, the IE recommended that BVES include an additional verification step in its pole replacement workflow to improve record accuracy. (IE ARC, page 37.)

³⁹ Appendix A.

6.4 BVES WMP Objective and Initiative Activity Attainment in 2024

Energy Safety assessed 68 wildfire mitigation initiatives for 2024 WMP attainment performance and found that four initiative activity targets (6%) were missed. The four initiative activities with missed targets from BVES’s 2024 WMP are the following:

- Capacitor Bank Upgrade Project (GD_14)
- Fuse TripSaver Automation (GD_15)
- Partial Safety and Technical Upgrades to Maltby Substation (GD_22)
- Safety and Technical Upgrades to Lake Substation (GD_23)

The complete list of the initiative activities with missed targets is shown in Table 4. To measure the gap between BVES’s WMP and its implementation, Section 6.4.1 elaborates on the financial impact of initiatives with missed targets on proposed expenditures, and Section 6.4.2 on the impacts of initiatives with missed targets planned risk reduction.

Table 4. BVES WMP Initiatives with Missed Targets⁴⁰

Not Attained BVES 2024 WMP Initiative	2024 WMP Initiative Activity Target	Actual Performance
Capacitor Bank Upgrade Project 8.1.2.8 GD_14	Target: Replacement of six capacitor banks	BVES had an annual target of replacing and connecting to SCADA six capacitor banks per year during the period of this WMP to consider this objective achieved. BVES replaced six capacitor banks but only connected four capacitor banks to SCADA.⁴¹ BVES missed its annual target because two capacitor banks were not connected to SCADA due to software communications and connectivity issues.

⁴⁰ Targets are sourced from the 2023-2025 Base WMP, pages 115-120.

⁴¹ See Appendix A.

Not Attained BVES 2024 WMP Initiative	2024 WMP Initiative Activity Target	Actual Performance
Fuse TripSaver Automation 8.1.2.8 GD_15	Target: Automation of 50 Fuse TripSavers.	BVES had an annual target of automating 50 Fuse TripSavers, while only 27 were automated in 2024. ⁴²
Partial Safety and Technical Upgrades to Maltby Substation 8.1.2.12 GD_22	Target: Completion of 64% of project milestones.	BVES had a 2024 target of completing 64% of the project milestones for this initiative. BVES's Q4 2024 QDR submission notes no progress on this initiative in 2024, and therefore Energy Safety concludes that 64% of the project milestones were not met in 2024. ⁴³
Safety and Technical Upgrades to Lake Substation 8.1.2.12 GD_23	Target: Completion of 64% of project milestones.	BVES had a 2024 target of completing 64% of the project milestones for this initiative. The IE ARC determined that BVES did not make progress towards achieving the target. ⁴⁴ BVES's Q4 2024 QDR submission notes no progress on this initiative in 2024, and therefore Energy Safety concludes that 64% of the project milestones were not met in 2024.

6.4.1 Impact of Initiatives with Missed Targets on Proposed Expenditures

Energy Safety quantifies, on an annual basis, the budgetary impact of BVES 2024 WMP initiatives with missed targets. For this assessment, Energy Safety creates three different perspectives of the financial impacts:

1. Relative magnitude of proposed expenditures for initiatives with missed targets to the overall 2024 WMP,

⁴² See Appendix A.

⁴³ IE ARC, page 55.

⁴⁴ IE ARC, pages 55-56.

2. Percentage of the proposed expenditures for the initiatives with missed targets that was spent, and
3. Of the 10 largest initiatives by proposed expenditures, the number of initiatives that had missed targets.

The total amount budgeted for the four initiative activities with missed targets was \$2.2 million, or 5% of the approximate \$42.6 million allocated in the 2024 WMP budget.

Of the \$2.2 million budgeted for the initiatives with missed targets, \$1.7 million was spent (80%).

Energy Safety found that of the 10 largest initiatives by proposed expenditure, one missed its target (Partial Safety and Technical Upgrades to Maltby Substation - GD_22) and represented a budgeted amount of \$0.7 million, or 4%, of the \$18.3 million allocated for these 10 initiatives in 2024.⁴⁵ For an overview of the entire 2024 WMP proposed expenditures as compared to the actual expenditures, see Section 6.5.

6.4.2 Impact of Initiatives with Missed Targets on Risk Reduction

Energy Safety's WMP Technical Guidelines require an electrical corporation to estimate the relative risk impact of its WMP mitigation activities by subtracting the remaining risk after the mitigation activity is completed from the risk that existed before the mitigation activity occurred.⁴⁶ The electrical corporation is then to divide the risk difference by the risk before the mitigation activity, and finally, multiply the divided number by 100.⁴⁷

When accounting for the amount of risk targeted for removal by an initiative, BVES's four missed initiatives impacted the planned risk to be removed. The 2024 WMP does not define the total risk that applies to the stated percentage risk reduction. For example, the 2024 WMP does not state if the planned risk reduction of 29% due to the capacitor bank update project would lead to a 29% reduction of total system-wide risk, a 29% reduction of total risk at a given circuit or region, or a 29% reduction of some other form of spatial or temporal risk.

Given this, Energy Safety observes that the initiatives with missed targets did not achieve their intended risk reduction and estimates the actual reduction in risk using the percentage of completed work as a proxy for actual reduced risk (Table 5).

⁴⁵ IE ARC, pages 13, 20, and 22.

⁴⁶ WMP Technical Guidelines, page 73.

⁴⁷ WMP Technical Guidelines, page 73.

Table 5. 2024 WMP Initiatives with Missed Targets – Impact on Risk Removed

Not Attained BVES 2024 WMP Initiative	% Risk Impact 2024 WMP ⁴⁸	% of WMP Initiative Complete	% Planned Risk Removed
Capacitor Bank Upgrade Project 8.1.2.8 GD_14	29%	67%	19%
Fuse TripSaver Automation 8.1.2.8 GD_15	29%	54%	16%
Partial Safety and Technical Upgrades to Maltby Substation 8.1.2.12 GD_22	87%	0%	0%
Safety and Technical Upgrades to Lake Substation 8.1.2.12 GD_23	87%	0%	0%

6.5 BVES 2024 WMP Expenditure Assessment

Energy Safety conducted an expenditure assessment to estimate BVES's spending alignment with its 2024 WMP. Unlike the assessment of the impact of initiatives with missed targets on proposed expenditures, this assessment considers all 2024 WMP initiatives and focuses on the gap between WMP proposed and actual spending, as stated in the WMP. In addition, Energy Safety's assessment identifies material deviations exceeding 10%, assessing how they impact BVES's planned spending accuracy.

⁴⁸ 2024 WMP, p. 115-120.

According to BVES's Q1 2024 QDR, the electrical corporation budgeted \$42.6 million for 68 2024 WMP initiatives.⁴⁹ Proposed and actual expenditures may differ across the EC ARC, IE ARC, and Energy Safety's assessment as the EC ARC and the IE ARC may include financial amounts for initiatives that have no activity targets. The EC ARC reported \$29.0 million (120%) spent of \$24.2 million proposed.^{50, 51} The IE ARC reported \$29.0 million (120%) spent of \$24.2 million proposed.^{52, 53} Energy Safety's assessment concluded that \$28.9 million (68%) was spent of \$42.6 million proposed.⁵⁴

The discrepancy between the proposed figures reported in the EC ARC and IE ARC (\$24.2 million), and those used by Energy Safety (\$42.6 million) stems from BVES's decision to reduce its proposed budget in its EC ARC as compared to previous reporting. Specifically, BVES reported a budget of \$43.6 million in its 2023-2025 Base WMP and \$42.6 million in its QDR, but only \$24.2 million in its EC ARC.⁵⁵ Energy Safety's assessment made use of BVES's QDR figure of \$42.6 million, which is \$18.4 million higher than the budget reported in its EC ARC or the IE ARC.

Energy Safety assessed BVES's expenditures on individual 2024 WMP wildfire mitigation initiatives and found that 72% (49 out of 68 initiatives) of the initiatives had actual expenditures that deviated more than 10% from those proposed. See the table in Appendix A for a complete list of initiatives and their proposed and actual expenditures.

7. Ignition Risk Performance

Energy Safety has developed a set of quantitative ignition risk performance metrics, categorizing them as direct and proxy metrics:⁵⁶

- **Direct Metric - Ignition Rates:** This report defines ignitions as incidents in which electrical corporation infrastructure was involved in an ignition. According to the Q4 2024 QDR, BVES did not report any ignitions for the 2017-2024 period.

⁴⁹ Q1 2024 QDR, Table 11

⁵⁰ EC ARC, Attachment D.

⁵¹ These values are as reported in the EC ARC and do not necessarily align with Energy Safety findings listed in Appendix A.

⁵² IE ARC, Table 7.

⁵³ These values are as reported in the IE ARC and do not necessarily align with Energy Safety findings listed in Appendix A.

⁵⁴ Budget comes from Q1 QDR 2024, spend comes from Q4 2024 QDR.

⁵⁵ 2023-2025 Base WMP, page 23; Q1 2024 QDR, Table 11; EC ARC, Attachment D.

⁵⁶ Data for all figures in this section utilize a combination of BVES's response to DR-285 and BVES data from the QDRs. Priority is given to the data request if both are available. Otherwise, 2015-2021 data are sourced from Q3 2022 QDR, 2022-2023 data are sourced from Q4 2023 QDR, and 2024 data are sourced from the relevant quarter's QDR (e.g., Q1 2024 data sourced from the Q1 2024 submission, Q2 2024 data sourced from the Q2 2024 submission, etc.)

- Proxy Metric - Wire Down Event Rate: This report defines wire down events as incidents in which overhead electrical lines fall to the ground, land on objects, or become disconnected from their moors. BVES reports its total number of wire down events to Energy Safety on a quarterly basis.⁵⁷
- Proxy Metric – Outage Event Rate: This report defines outages as all unplanned outages experienced in BVES’s territory, without accounting for PSPS. BVES reports its total amount of outages to Energy Safety on a quarterly basis.⁵⁸

For this report, Energy Safety estimated BVES’s ignition risk performance metrics for the calendar years 2017 through 2024, with particular attention to the 2024 outcomes.

For direct and proxy performance metrics, Energy Safety converted the metric counts into rates by dividing them by BVES’s Overhead Circuit Miles (OCM). These rates for ignition risk events add nuance to the assessment and allow for comparisons across the regulated industry.

To see the raw counts of all ignition risk events and OCM values for each year used, see Appendix C.

7.1 Ignition Rates

Energy Safety requires electrical corporations to report data, such as ignitions, that help Energy Safety assess whether an electrical corporation reduced its wildfire risk while also reducing its reliance on PSPS events.

BVES did not report ignitions from 2017 to 2024, and so ignition rates were not calculated for BVES.⁵⁹

7.2 Wire Down Event Rates

Wire down events are wildfire risks where a wire is touching the ground, touching an object, or has become disconnected from its mooring. This type of event poses a risk of ignition or a danger to people if that wire is also energized with electricity.

Wire Down Events per Overhead Circuit Mile

To account for concurrent overhead grid expansion within BVES’s territory and allow for comparisons with other utilities, wire down events normalized by overhead circuit miles (OCM) are provided as a rate of wire down events per 1,000 miles and delineated by HFTD Tier 3, and HFTD Tier 2 areas. Additionally, a dotted linear fit is estimated for each HFTD tier to

⁵⁷ 2024 Q4 QDR.

⁵⁸ 2024 Q4 QDR.

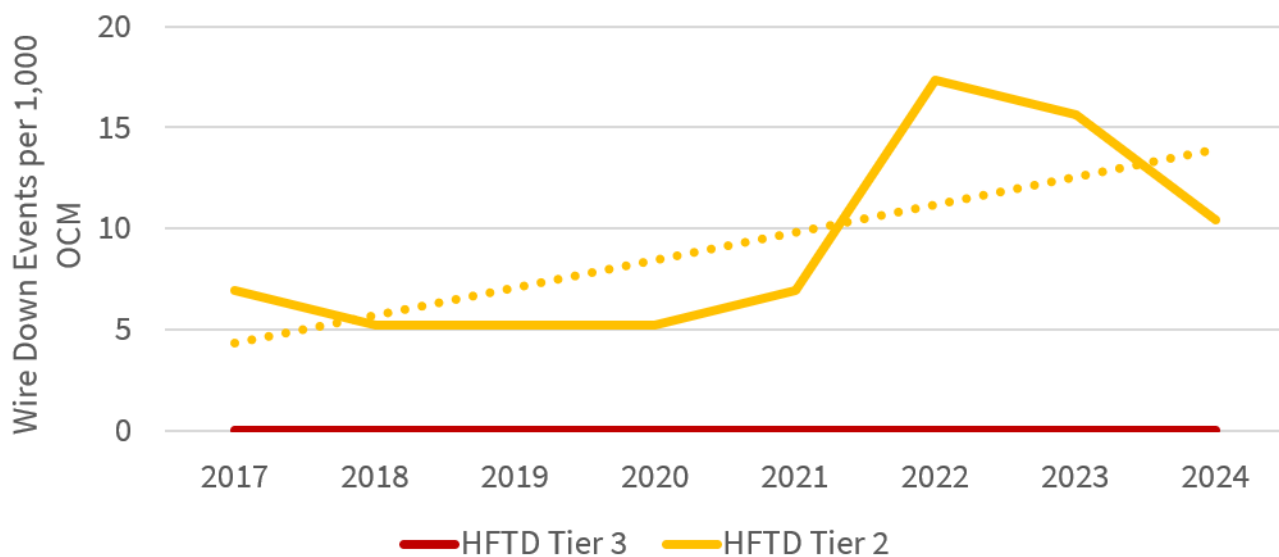
⁵⁹ 2024 Q4 QDR.

account for year-to-year variations in the data. As the linear fit is based on only eight data points, any appearance of a slope is only suggestive and not conclusive.

BVES's wire down events occurred only in HFTD Tier 2 areas (Figure 2). Based on information provided by BVES, wire down events per OCM in HFTD Tier 2 areas remained mostly flat from 2017 to 2021. In 2022, there was a noticeable increase, followed by a slow decrease to 2024. Although the linear fit of BVES's wire down events per mile shows an upward slope for the 2017-2024 period, what appears to be an overall increase is not conclusive as is based on a low number of occurrences, a fair amount of variance, and only eight data points.

For wire down event counts, see Appendix C, Figure 36.

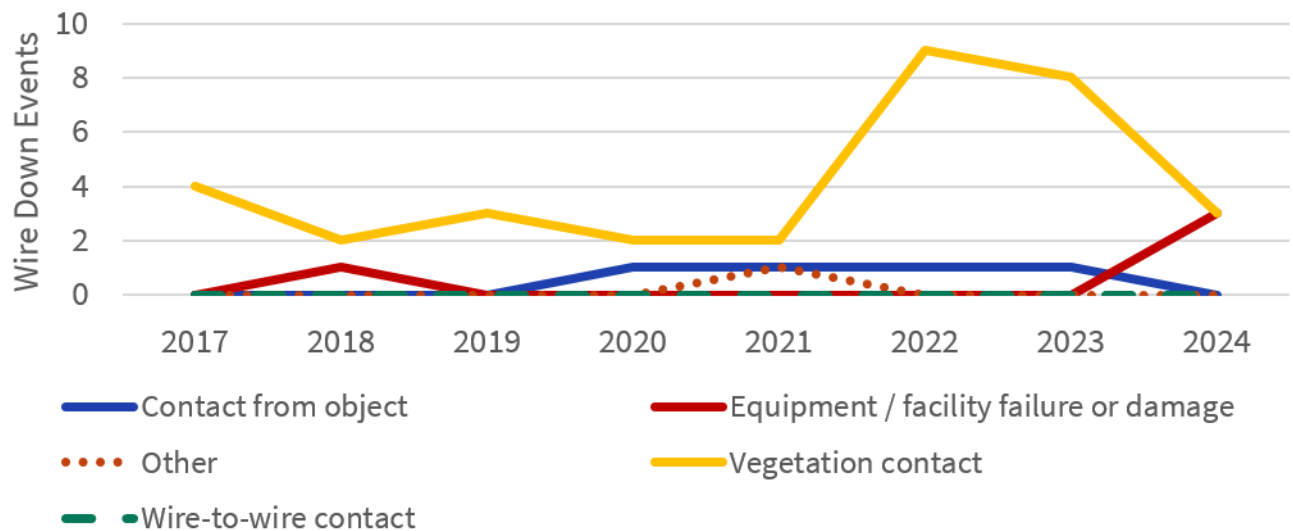
Figure 2. BVES Wire Down Events per OCM (2017-2024) by HFTD Tier with Linearization



Wire Down Events by Risk Driver

To show the most common causes of BVES wire down events, counts are delineated by risk drivers (Figure 3). In BVES's service territory, vegetation contact has and continues to be the leading cause of wire down events. Vegetation contact is generally at least twice any other cause, such as contact with non-vegetation objects or wire-to-wire contact, except in 2024. Based on data provided by BVES, wire down events attributable to vegetation contact increased in 2022 and 2023 compared to 2020 and 2021 levels. However, in 2024, the event counts returned to levels approximating those found before 2022.

Figure 3. BVES Wire Down Events Delineated by Risk Driver (2017-2024)

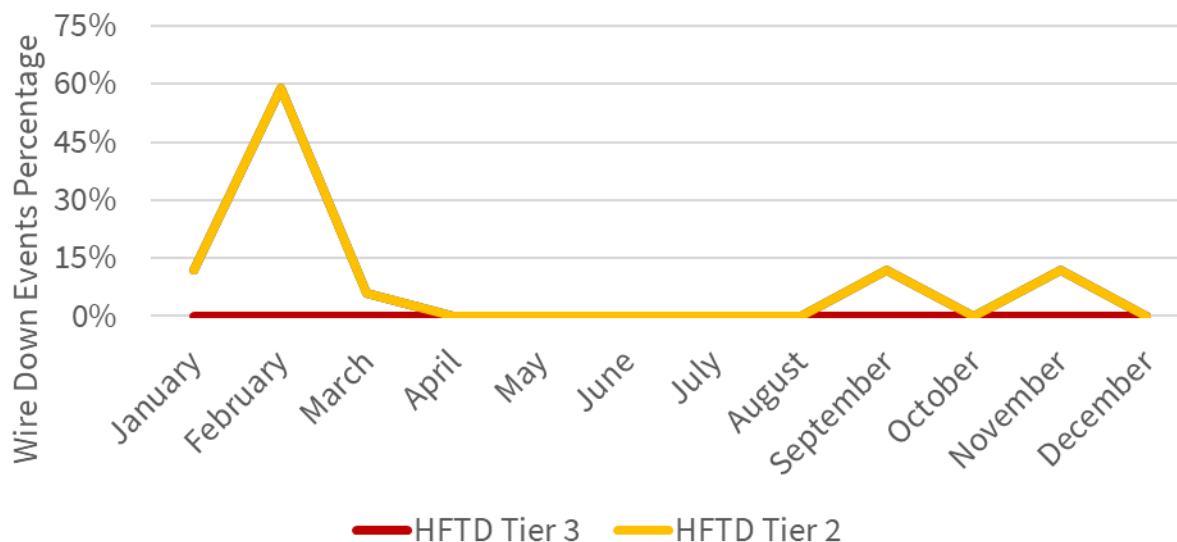


Wire Down Events Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, wire down events recently occur. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month and each HFTD tier by the 3-year average number of all wire down events for the year.

According to the assessment conducted, approximately 75% of BVES's wire-down events over the past three years occurred in BVES's HFTD Tier 2 during the months of January through March, with 60% of wire down events happening in February (Figure 4).

Figure 4. BVES 3-Year Average (2022-2024) of Monthly Wire Down Events by HFTD Tier



7.3 Outage Event Rates

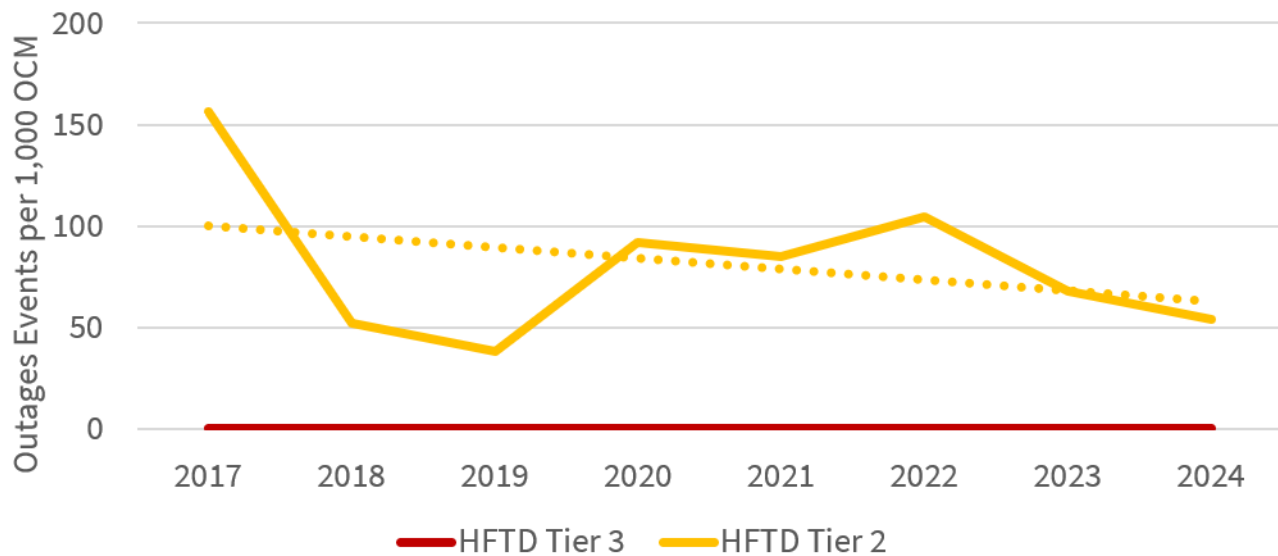
Power outages (outages) are unplanned power outage events (i.e., do not include PSPS events) tabulated by circuits and not by number of customers impacted. Outage events are tracked as outcomes that may both cause ignitions and impact a customer's quality of life.

Outage Events per Overhead Circuit Mile

To account for concurrent overhead grid expansion within BVES's territory and allow for comparisons with other utilities, outages normalized by OCM are provided as a rate of outages per 1,000 miles and delineated by HFTD Tier 3, and HFTD Tier 2 areas. Additionally, a dotted linear fit is estimated for each HFTD tier to account for year-to-year variations in the data. As the linear fit is based on only eight data points, any appearance of a slope is only suggestive and not conclusive.

Similar to wire down events, BVES's outage events were entirely in HFTD Tier 2 areas (Figure 5). Based on information provided to Energy Safety, outage events per OCM in HFTD Tier 2 areas decreased from 2017 to 2019, and fluctuated from 2019 to 2024. When taking out year-to-year variance, BVES's HFTD Tier 2 linear fit supports a gradual decrease in outage events for the 2017-2024 period. However, this apparent decrease over the period is not meaningfully different from a constant line as the line is based on only eight points of data that have a fair amount of variance.

For raw outage event counts, see Appendix C, Figure 10.

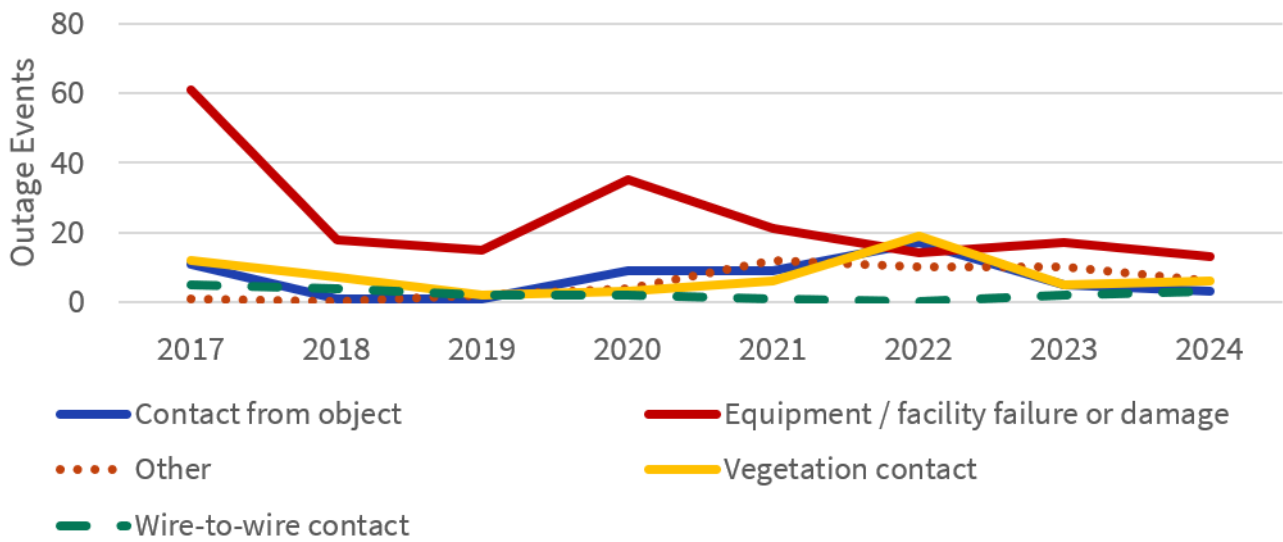
Figure 5. BVES Outage Events per OCM (2017-2024) by HFTD Tier with Linearization⁶⁰

Outage Events by Risk Driver

To indicate which causes of BVES's unplanned outages are the most common, events are shown delineated by risk drivers (Figure 6). Unlike wire-down events, outage events in BVES's service territory have historically been driven primarily by equipment or facility failures, except in 2022, when vegetation contact and contact from object were the leading causes. Based on the data received, equipment failure as a cause of outage events generally decreased from 2017 to 2024.

⁶⁰ In 2022, BVES expanded its reporting to Energy Safety to include both primary and secondary circuits; prior years included only primary circuits. To ensure year-over-year comparability, Energy Safety calculated BVES's wire down events per overhead circuit mile (OCM) using both primary and secondary circuits consistently across all years.

Figure 6. BVES Outage Events Delineated by Risk Driver



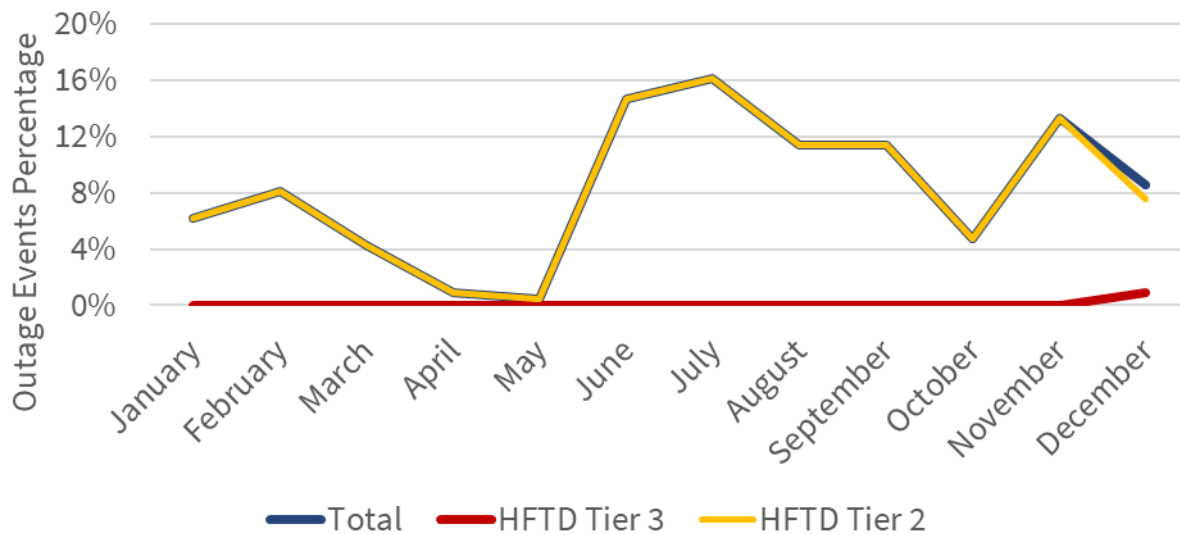
Outage Events Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, outage events recently occur. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month within each HFTD tier by the 3-year average number of all events for the year.

According to the assessment conducted,⁶¹ most outages in BVES’s territory occur in HFTD Tier 2 during the summer months (Figure 7). In HFTD Tier 3, there is a small increase in outages in December, but it is not large enough to draw conclusions.

⁶¹ 2024 Q4 QDR.

Figure 7. BVES 3-Year Average (2022-2024) of Monthly Outage Events by HFTD Tier



8. Public Safety Power Shutoff Event Performance

PSPS events are planned outages that may be used as a wildfire mitigation tool during extreme fire conditions such as hot, dry, and windy days. While useful as a wildfire mitigation measure, PSPS events carry their own risks and adverse impacts on customers – particularly vulnerable customers who rely on electricity. As such, electrical corporations take mitigating actions to reduce the frequency, scope, duration, and impacts of PSPS events.

The following four PSPS event parameters are assessed by year and comprise the main components of the PSPS event performance assessment:

- *Scope* is measured as the total number of utility circuits impacted because of PSPS events,
- *Duration - Customer* is measured by the total number of customer-hours because of PSPS events,
- *Duration - Critical Infrastructure* is measured as the total number of critical infrastructure-hours affected by PSPS events, and
- *Impact* is measured as the total number of customers affected by PSPS events.

BVES has not recorded any PSPS events from 2017 through 2024.⁶² Therefore, no assessment of BVES's PSPS event performance is provided.

9. Outcome Metrics Performance

This section presents outcome performance metrics on electrical corporation-related wildfires including:

1. *Acres burned* – The total number of acres burned due to electrical corporation caused fires,
2. *Structures damaged/destroyed* - The total number of structures damaged or destroyed due to electrical corporation caused fires,
3. *Injuries/fatalities* - The total number of injuries and fatalities due to electrical corporation caused fires, and
4. *Value of assets destroyed* - The total value of assets destroyed due to electrical corporation caused fires.

From 2017 to 2024, BVES reported no wildfire-related outcome events. Therefore, no assessment of BVES's wildfire related outcome metrics performance is provided.⁶³

10. Reporting Accuracy and Completeness Performance

This section considers whether BVES exhibited any documentation issues in its reporting on 2024 WMP implementation. To accomplish this, Energy Safety holistically assessed all relevant information sources, including inspection field verifications, for any systemic failings or inconsistencies that may have hindered BVES's ability to accurately record and report on its 2024 WMP implementation.

Reporting accuracy and completeness is relevant to an electrical corporation's overall performance. For if an electrical corporation cannot accurately track WMP work and report on progress toward its WMP targets, this calls into question 1) the validity of reporting WMP progress, and 2) the situational awareness of the electrical corporation and therefore its ability to achieve its WMP risk reduction goals through planned wildfire safety mitigation activities. In this section of the report, five dimensions of reporting accuracy and completeness are combined to provide an overall performance assessment. The five dimensions of performance for reporting and completeness are:

⁶² 2025 Q1 QDR, Table 11; 2024 Q4 QDR, Table 10.

⁶³ 2023 Q3 QDR, Table 2; 2024 Q4 QDR, Table 2.

1. The consistency of data reporting between the QDR and the EC ARC is assessed for issues beyond routine data value updates,
2. VMA Reports are reviewed for accuracy and completeness issues identified,
3. Findings from the IE ARC QA/QC program maturity model evaluations are summarized along with any other IE ARC data issues observed,
4. Consistency between QDR tabular and QDR spatial reporting is reviewed, and
5. Data accuracy issues identified by the inspections team are reviewed.

10.1 QDR as compared to EC ARC

Energy Safety's data assessment identified that most of BVES's EC ARC targets align with the electrical corporation's quarterly reporting.⁶⁴ The most notable exceptions are initiatives GD_2, Radford Line-related Covered Conductor Installation, and GD_5, Radford Line-related Distribution Pole Replacements and Reinforcements, with BVES reporting in its 2024 EC ARC targets not previously approved by Energy Safety.⁶⁵ Similarly, for GD_23, Safety and Technical Upgrades to Lake Substation, BVES reported in its QDR an initiative target not previously approved by Energy Safety and skipped reporting on the initiative altogether in its EC ARC.⁶⁶

Furthermore, for the Covered Conductor Replacement Project initiative (GD_1), BVES reported an actual total in its EC ARC that contradicted the amount reported in its spatial QDR submissions. While the EC ARC claimed that the 12.9-mile target for this initiative was met,⁶⁷ BVES only reported a total of 9.9 miles as complete in its 2024 spatial QDR data (see Section 10.4). Similarly, for the Evacuation Route Hardening Project initiative (GD_6), BVES reported an actual total in its EC ARC that contradicted what it later reported to the IE, as well as contradicting the amount reported in its spatial QDR submissions to Energy Safety. This deviation led the IE to recommend that BVES adopt "an additional verification step in BVES's pole-replacement workflow to improve asset-record accuracy."⁶⁸ The inconsistent data reported by BVES regarding these two initiatives hindered Energy Safety's ability to assess BVES's performance in 2024.

While BVES's approved 2023-2025 Base WMP states a total budget of \$43.6 million across all initiatives (regardless of whether they are quantitative or qualitative), BVES's EC ARC reports a total budget of \$24.3 million.⁶⁹ This is a 44% decrease for the 2024 calendar year, which is a major discrepancy when compared to the amount previously submitted and approved by Energy Safety.⁷⁰

⁶⁴ Q4 2024 QDR, Table 1

⁶⁵ 2025 WMP Update - Rejection and Order to Resubmit, page 2

⁶⁶ 2024 EC ARC, Attachment C

⁶⁷ EC ARC, Attachment C.

⁶⁸ IE ARC, page 37.

⁶⁹ 2024 EC ARC, Attachment D.

⁷⁰ Q1 2024 QDR, Table 11.

Overall, Energy Safety observes that there are ongoing shortcomings with BVES's WMP attainment reporting and expects better alignment between BVES's QDR reporting and its EC ARC in the future.

For an initiative-by-initiative comparison of QDR reporting as compared to EC ARC reporting, see Appendix A.

10.2 Vegetation Management Audit Report

Identified Issues

According to Energy Safety's VMA Report, BVES committed to vegetation management inspections of its entire overhead system (205 circuit miles) using unmanned aerial vehicle high-definition photography and videography as indicated in its 2023-2025 Base WMP.⁷¹ BVES provided documentation showing that unmanned aerial vehicle inspections were conducted at each primary pole location in its service territory. However, the documentation did not indicate that the conductors spanning between these primary pole locations were also inspected.⁷² This finding by Energy Safety made clear that BVES's data collection practices supported inspections only around primary pole locations, rather than along the full length of conductors, casting doubt on BVES's target attainment.⁷³

BVES faced a similar challenge with supporting documentation for its vegetation management third party ground patrol inspection program. BVES provided documentation showing that vegetation management third party ground patrols inspected 6,615 primary pole locations and the conductors spanning between pole locations in 2024. However, BVES's WMP target used a reporting metric based on circuit miles rather than the number of poles inspected. This mismatch between the target unit (circuit miles) and the attainment unit (poles inspected) required additional inquiry from Energy Safety to assess the initiative's attainment.⁷⁴

Finally, BVES could not provide documentation to indicate that pole clearing work was completed in 2024. Energy Safety asked for the date each pole was inspected, cleared of vegetation, and whether each activity was conducted in accordance with Public Resources Code (PRC) section 4292 requirements. In its response to Energy Safety, BVES stated that it did not know the locations of all poles within its service territory that had non-exempt equipment under PRC section 4292, and due to this data gap, Energy Safety could not determine if BVES met the objective of this initiative.⁷⁵

⁷¹ VMA Report, page 6.

⁷² VMA Report, Appendix 1, page A-14.

⁷³ VMA Report, page 6.

⁷⁴ VMA Report, Appendix 1, page A-16.

⁷⁵ VMA Report, Appendix 1, pages A-19 – A-20.

10.3 IE ARC Evaluation

According to the IE's QA/QC maturity model evaluation, the two areas where BVES demonstrated the greatest opportunity for advancement were Quality Culture and Quality Management System maturity dimensions, both of which received a score of "Applied."⁷⁶ Regarding Quality Culture, the IE identified limited cross-departmental QA/QC integration beyond operational areas and the absence of formal accountability tracking mechanisms.⁷⁷ Regarding BVES's Quality Management System, the IE noted that BVES had not yet implemented its new vegetation management database, which was scheduled for 2025 deployment.⁷⁸

BVES's highest-ranked dimensions in the IE's QA/QC maturity model were Quality Assurance/Audits and QA/QC Technology Adoption, both of which received a score of "Routine."⁷⁹ According to the IE's evaluation, quality control had become integral to BVES operations, with virtually all work undergoing systematic QC review.⁸⁰ Regarding QA/QC Technology Adoption, the IE determined that BVES successfully demonstrated the implementation of automation devices.⁸¹ According to the IE, qualified BVES personnel reviewed all findings generated by automation devices and, when necessary, conducted a reassessment of asset condition priorities.⁸²

Despite the positive evaluation of BVES's QA/QC practices in the IE ARC, the IE mentioned that BVES's documentation regarding patrol inspections lacked detail on findings or explicit HFTD tier identification.⁸³ However, the IE acknowledged that BVES's entire territory is located within HFTD Tiers 2 and 3 areas, and therefore, this data issue did not particularly undermine BVES's patrol inspections program.⁸⁴

10.4 Comparison of Spatial and Tabular QDR Data

Pursuant to Energy Safety's Data Guidelines, electrical corporations must submit quarterly data reports in both spatial and non-spatial (i.e., tabular) formats. Each of these quarterly reports must contain accurate information about the progress in meeting WMP targets throughout a performance period.⁸⁵

⁷⁶ IE ARC, page 150

⁷⁷ IE ARC, page 147

⁷⁸ IE ARC, page 148

⁷⁹ IE ARC, page 150.

⁸⁰ IE ARC, page 148.

⁸¹ IE ARC, page 149.

⁸² IE ARC, page 149.

⁸³ IE ARC, page 57.

⁸⁴ IE ARC, page 57.

⁸⁵ Data Guidelines v3.2, p. 59-65.

Energy Safety assessed the data submitted by BVES regarding the WMP work it completed in 2024, in both the spatial and tabular QDR submissions. Energy Safety found the following inconsistencies between spatial and tabular QDR submissions for three initiatives (Table 6).⁸⁶

Table 6. Energy Safety Summary of BVES Initiatives with Inconsistent QDR Reporting

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ⁸⁷	Actual Recorded in Tabular QDR ⁸⁸	Actual Recorded in Spatial QDR	Deviation (%) ⁸⁹
Covered Conductor Replacement Project 8.1.2.1 GD_1	12.9 circuit miles of line replacement	13.3 circuit miles replaced	111 points or 8.2 circuit miles replaced ⁹⁰	26% According to the spatial data submitted by BVES, BVES did not meet its target for covered conductor installation under GD_1 in 2024. While Energy Safety considers this initiative activity met given the field verification of the activity by the IE, BVES should improve its spatial reporting to match its tabular data submissions.

⁸⁶ For more information regarding the unmet initiatives, see Appendix A.

⁸⁷ 2023-2025 Base WMP, p. 123

⁸⁸ Q4 2024 QDR, Table 1.

⁸⁹ When units of measure were comparable, such as with points and poles, Energy Safety proceeded to note the percent deviation between tabular and spatial data. When units of measure were not comparable such as with miles and points, Energy Safety did not attempt to present a percent deviation.

⁹⁰ BVES submitted its attainment for GD_1 in both points and meters. Energy Safety was able to convert BVES's 15,922 meters to miles, obtaining the 9.9 miles included in Table 6.

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ⁸⁷	Actual Recorded in Tabular QDR ⁸⁸	Actual Recorded in Spatial QDR	Deviation (%) ⁸⁹
Evacuation Route Hardening Project 8.1.2.3 GD_6	500 poles hardened	1,095 poles hardened	96 points hardened	N/A Units of measure differ between the Spatial QDR and the Tabular QDR. ⁹¹
Clearance 8.2.3.3 VM_9	72 circuit miles cleared	99.5 circuit miles cleared	42,309,314 square meters cleared or 1,778 points	N/A Units of measure differ between the Spatial QDR and the Tabular QDR.

Energy Safety conducted a similar assessment of BVES's reporting of ignition risk metrics. Energy Safety did not identify deviations in the tabular and spatial reporting of ignition risk events (Table 7).

Table 7. Energy Safety Summary of Ignition Risk Metrics with Inconsistent QDR Reporting

Risk Metrics with Inconsistent QDR Reporting	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%)
2024 Total Ignitions ⁹²	N/A	N/A	N/A
2024 Total Wire Down Events	6	6	0%
2024 Total Unplanned Outage Events	31	31	0%

⁹¹ Due to differences in units reported by the two different formats, a determination on initiative completion could not be applied.

⁹² BVES did not report any ignitions for the year 2024.

10.5 Field Inspection Issues Identified

Energy Safety's field inspections identified two cases where work reported as completed toward WMP goals was not actually implemented (see Section 6.3.2). This represents two cases where project tracking was not accurate or consistent.

10.6 Data Accuracy and Completeness Conclusions

Energy Safety found that BVES's documentation and reporting in 2024 on targets and actual attainment improved when compared to the 2023 WMP cycle. However, given the issues identified in the prior five sub-sections, Energy Safety identified that BVES's data accuracy and completeness performance still requires improvement and is "developing."

The QDR comparison to the EC ARC identified data issues, the VMA Report identified several specific data issues, the IE ARC identified a much-improved QA/QC level of maturity with room for further development, and the field inspectors identified two cases of inaccurate project tracking.

Energy Safety will monitor BVES's reporting and expect improvements regarding the accuracy of BVES's documentation and tracking processes going forward.

11. Conclusion

Energy Safety makes the following observations and recommendations regarding performance of BVES's 2024 WMP implementation.

To get a full representation of BVES's performance, the electrical corporation is assessed using a five-dimensional metric. The five performance dimensions are: WMP attainment performance, ignition risk performance, public safety power shutoff performance, outcome metrics performance, and data reporting accuracy and completeness performance. When viewed together, these separate assessments provide a comprehensive assessment of BVES's execution of its 2024 WMP initiatives.

WMP Initiative Attainment Performance

BVES completed 64 of its 68 2024 WMP initiatives (94%; 9% higher than in the previous performance year).⁹³ However, two of the four missed initiatives were also not met in 2023

⁹³ 2023 ARC, page 1.

(upgrades to the Maltby and Lake substations). Continuing failure to meet targets for these initiatives suggest a lack of urgency.

Furthermore, BVES failed to meet its commitments for four of its WMP initiatives and failed to fund five of the 10 initiatives with the largest proposed expenditure. One of the missed initiatives of note, BVES's Capacitor Bank Upgrade Project, met only 67% of the risk reduction target, and actual expenditures were 17% greater than projected expenditure.

As a gauge for the magnitude of the missed initiatives, BVES spent below the proposed amounts on its 2024 WMP initiatives by \$13.3 million, or 31% of the overall budget.

Ignition Risk Performance

BVES had no ignitions in its territory from 2017 to 2024. However, Energy Safety has not identified a meaningful reduction in wire-down or outage events during the period assessed.

Public Safety Power Shutoff Performance

BVES recorded no PSPS events or wildfire-related outcome events from 2017 to 2024. As a result, PSPS performance could not be assessed.

Data Reporting Accuracy and Completeness Performance

BVES is progressing toward more robust reporting, but opportunities remain to improve its proposed spending reporting, its QA/QC programs' maturity, and the consistency of its initiative reporting data. Previous Energy Safety reports on BVES's WMP implementation have identified the need for BVES to address these kinds of data quality issues. For example, the 2023 annual report found that BVES did not report on 47 of the 65 initiative activities in its EC ARC and that the 2023 QDR reported inconsistent targets for nine of the 65 2023 WMP initiatives. The 2020 and 2021 annual reports for BVES found data governance and overall reporting issues that indicated systemic issues, including targets that were inconsistently reported across a variety of data submissions.

BVES's continuing inability to sufficiently address its data reporting issues identified over multiple years raises questions about BVES's data governance and its ability to maintain effective situational awareness of its system. BVES must continue to improve its performance in this area.

In Conclusion

Despite the data reporting issues, Energy Safety did not find any systemic issues that hindered BVES's ability to adequately meet its 2024 WMP commitments. However, Energy Safety's assessment of BVES's performance revealed instances where BVES failed to foresee and disclose planning constraints that resulted in missed initiatives.

Energy Safety acknowledges that in 2024, BVES undertook efforts to reduce its wildfire risk. However, there are still areas to improve upon and opportunities to continue learning, especially considering the missed initiative targets and data consistency issues. Energy Safety

will continue to monitor BVES's implementation of its ongoing wildfire mitigation activities, its planning activities, and its ability to forecast implementation constraints so that BVES improves its ability to eliminate utility-caused catastrophic wildfires in California.

12. References

The full references for each footnote citation appear in Table 8.

Table 8. References for Citations

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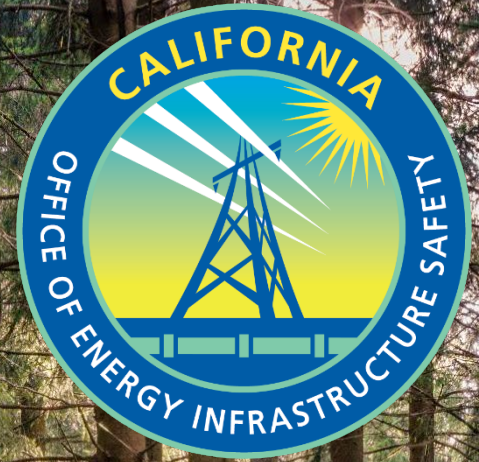
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DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED

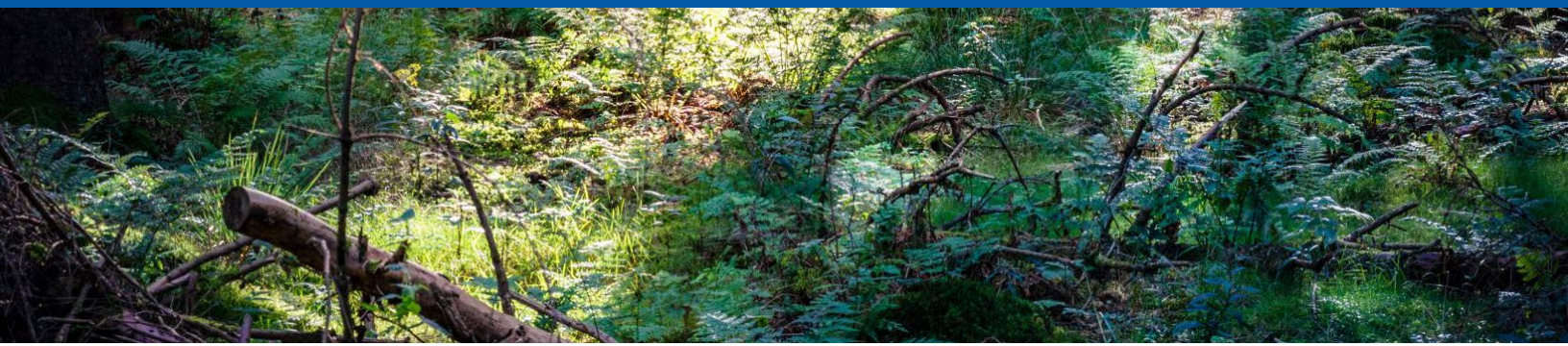


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APPENDICES



13. Appendices

Appendix A: BVES Information on WMP Initiative Activity Attainment

Summarized in Table 9 are each of BVES's 68 initiative activity targets from its 2024 WMP, BVES's self-reporting on performance contained in its QDR and EC ARC, the IE ARC, and the VMA Report.⁹⁴

Table 9. WMP Initiative Activity Attainment Information⁹⁵

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) ⁹⁶	Actual Expenditure (\$ thousand)
Covered Conductor Replacement Project 8.1.2.1 GD_1	12.9 circuit miles.	Met Target: 12.9 miles Actual: 13.3 miles	Met Target: 12.9 miles Actual: 13.3 miles	Met Target: 12.9 miles Actual: 13.3 miles	Met	\$4,737	\$4,595

⁹⁴ Q4 2024 QDR, EC ARC, IE ARC, and VMA Report.

⁹⁵ This table includes all initiative activities that had targets for the 2024 calendar year but does not include initiative activities for which BVES had proposed or actual expenditures and no targets for the 2024 calendar year.

⁹⁶ If BVES did not report a proposed spending amount for a particular initiative in its QDR, the corresponding cell in this column is shown as zero. Where BVES provided additional context to Energy Safety or the IE, that information is noted in a footnote.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) ⁹⁶	Actual Expenditure (\$ thousand)
Radford Line-related Covered Conductor Installation 8.1.2.1 GD_2	0 circuit miles.	Met Target: 2.7 miles Actual: 3.1 miles	Met Target: 2.7 miles Actual: 2.8 miles	Met Target: 2.7 miles Actual: 2.8 miles	Met ⁹⁷	\$ -	\$5,865

⁹⁷ BVES requested Energy Safety on April 2, 2024, to amend its 2023 and 2024 targets for this initiative (2.7 circuit miles and 0 circuit miles, respectively). BVES requested that its 2023 target be modified to zero circuit miles and its 2024 target to 2.7 circuit miles. Energy Safety refused to do so, under the grounds that BVES's 2024 target modifications were not reportable updates for the 2025 WMP Update. However, BVES still reported its 2024 progress using the 2.7 circuit miles target, and the IE relied on the 2.7 circuit miles target for its assessment.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Minor Undergrounding Upgrades Projects 8.1.2.2 GD_3	Initiate underground projects as needed.	Missing Target: Initiate underground projects as needed Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Initiate underground projects as needed Actual: Activity validated	Met ⁹⁸	\$304	\$95
Distribution Pole Replacements and Reinforcements 8.1.2.3 GD_4	200 poles replaced.	Met Target: 200 poles Actual: 262 poles	Met Target: 200 poles Actual: 262 poles	Met Target: 200 poles Actual: 262 poles	Met	\$2,030	\$1,970

⁹⁸ BVES does not have any large-scale undergrounding projects planned within its 2023 – 2025 WMP cycle. Instead, the EC carries out small undergrounding upgrades for new developments and minor improvements to existing underground facilities. In 2024, BVES executed one minor underground project in a manner consistent with the initiative description.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Radford Line-related Distribution Pole Replacements and Reinforcements 8.1.2.3 GD_5	70 poles replaced.	Met Target: 70 poles Actual: 83 poles	Met Target: 70 poles Actual: 83 poles	Met Target: 70 poles Actual: 88 poles	Met ⁹⁹	\$ -	\$2,514
Distribution Pole Replacements and Reinforcements 8.1.2.3 GD_6	500 poles installed with wire mesh.	Met Target: 500 poles Actual: 1,095 poles	Met Target: 500 poles Actual: 1,095 poles	Met Target: 500 poles Actual: 929 poles	Met	\$808	\$541

⁹⁹ BVES requested Energy Safety on April 2, 2024, to amend its 2023 and 2024 targets for GD_5 (70 poles replaced and zero poles replaced, respectively). BVES requested that its 2023 target be modified to zero poles replaced and its 2024 target to 70 poles replaced. Energy Safety refused to do so, under the grounds that BVES's 2024 target modifications were not reportable updates for the 2025 WMP Update. However, BVES still reported its 2024 progress using the 70 poles replaced target, and the IE relied on the 70 poles replaced target for its assessment.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Traditional Overhead Hardening 8.1.2.5 GD_8	As needed maintenance	Missing Target: As needed maintenance Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: As needed maintenance Actual: Activity validated	Met	\$810	\$1,670
Bear Valley Solar Energy Project, Microgrids 8.1.2.7 GD_10	File permitting applications.	Missing Target: File permitting applications Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: File permitting applications Actual: Activity validated	Met	\$13,578	\$ -
Bear Valley Storage Project, Microgrids 8.1.2.7 GD_11	File permitting applications.	Missing Target: File permitting applications Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: File permitting applications Actual: Activity validated	Met	\$10,342	\$ -

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Substation Automation 8.1.2.8 GD_12	Three substations automated and connected to SCADA.	Met Target: Three substations automated and connected to SCADA Actual: Three substations automated and connected to SCADA	Met Target: Three substations automated and connected to SCADA Actual: Three substations automated and connected to SCADA	Met Target: Three substations automated and connected to SCADA Actual: Three substations automated and connected to SCADA	Met	\$656	\$1,114
Installation of System Automation Equipment 8.1.4.8 GD_13	10 Field switches automated and connected to SCADA.	Met Target: Ten field switches automated Actual: Ten field switches automated	Met Target: Ten field switches automated Actual: Ten field switches automated	Met Target: Ten field switches automated Actual: Ten field switches automated	Met	\$674	\$1,200

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Installation of System Automation Equipment 8.1.2.8 GD_14	Six capacitor banks replaced and connected to SCADA.	Not met Target: Six capacitor banks Actual: Four capacitor banks	Not met Target: Six capacitor banks Actual: Four capacitor banks	Not met Target: Six capacitor banks Actual: Four capacitor banks	Not met	\$319	\$692
Installation of System Automation Equipment 8.1.2.8 GD_15	50 fuse TripSavers automated and connected to SCADA.	Not met Target: 50 fuse TripSavers automated Actual: 27 fuse TripSavers automated	Not met Target: 50 fuse TripSavers automated Actual: 27 fuse TripSavers automated	Not met Target: 50 fuse TripSavers automated Actual: 27 fuse TripSavers automated	Not met	\$137	\$298

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Installation of System Automation Equipment 8.1.4.8 GD_16	64% of project milestones met for server installation.	Missing Target: 64% of project milestones met Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: 64% of project milestones met Actual: Activity validated	Met ¹⁰⁰	\$	\$61

¹⁰⁰ As described within the 2023-2025 WMP, the 2024 objective for this initiative was to complete the server-installation project milestone. To verify the reported progress, the IE issued Data Request DR020 requesting records of completion, and visited BVES's main facility, capturing photographs of the renovated server room and the installed equipment. Based on the field evidence reviewed, the IE validated this initiative.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Installation of System Automation Equipment 8.1.2.8 GD_17	50% of project milestones met for Distribution Management Center (DMC).	Missing Target: 50% of project milestones met Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: 50% of project milestones met Actual: Activity validated	Met ¹⁰¹	\$37	\$65
Other Grid Topology Improvements to Minimize Ignitions 8.1.2.10 GD_19	100 tree attachments removed.	Met Target: 100 tree attachments Actual: 104 tree attachments	Met Target: 100 tree attachments Actual: 104 tree attachments	Met Target: 100 tree attachments Actual: 104 tree attachments	Met	\$607	\$699

¹⁰¹ As described within the 2023-2025 WMP, the 2024 objective for this initiative was to complete the Distribution Management Center project milestone. To verify the reported progress, the IE issued Data Request DR047 requesting the current status and layout of the DMC, and performed a site visit at BVES's main facility, confirming that the room configuration and equipment matched the drawing. Based on the field evidence reviewed, the IE validated this initiative.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Bear Valley Power Plant (BVPP) Phase 4 Upgrade Project 8.1.2.12 GD_21	64% of project milestones for natural engine upgrades.	Missing Target: 64% of project milestones met Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: 64% of project milestones met Actual: Activity validated	Met ¹⁰²	\$562	\$594
Other Technologies and Systems Not Listed Above 8.1.2.12 GD_22	64% of project milestones for Maltby Substation.	Missing Target: 64% of project milestones Actual: Missing	Missing Target: Missing Actual: Missing	Missing Target: Missing Actual: Missing	Not met ¹⁰³	\$1,777	\$795

¹⁰² The WMP outlines that Phase 4 activities include engine control upgrades, detonation sensing system improvements, and installation of new speed and generator controls, all aimed at improving plant performance, reducing vibration, and ensuring operational readiness. BVES provided information that reasonably supports progress toward the WMP goals. The submission included a list of seven engines with corresponding Phase 4 work items and a completion date, a narrative on how the upgrades reduce PSPS risk, an invoice confirming Phase 3 work at one unit, and an executed contract with San Diego Power LLC outlining four project phases and seven change orders. Based on the evidence reviewed, the IE validated this initiative.

¹⁰³ As described in Section 6, BVES's Q4 2024 QDR submission reported that no progress was made on this initiative in 2024.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Other Technologies and Systems Not Listed Above 8.1.2.12 GD_23	64% of project milestones for Lake Substation.	Missing Target: 64% of project milestones Actual: Missing	Missing Target: Missing Actual: Missing	Not met Target: 64% of project milestones Actual: Project has not started	Not met	\$ -	\$ -
Detailed Inspection Program 8.1.3.1 GD_25	51 circuit miles inspected.	Met Target: 51 circuit miles inspected Actual: 51 circuit miles inspected	Met Target: 51 circuit miles inspected Actual: 51 circuit miles inspected	Met Target: 51 circuit miles inspected Actual: 51 circuit miles inspected	Met	\$14	\$25

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Patrol Inspection Program 8.1.3.2 GD_26	205 circuit miles inspected.	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met	\$32	\$59
Unmanned Aerial Vehicle Thermography 8.1.3.3 GD_27	205 circuit miles inspected.	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met	\$54	\$65

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Unmanned Aerial Vehicle Photography and Videography 8.1.3.4 GD_28	205 circuit miles inspected.	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met	\$54	\$65
LiDAR Inspections 8.1.3.5 GD_29	205 circuit miles inspected.	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met	\$55	\$72

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Third Party Ground Patrol 8.1.3.5 GD_30	205 circuit miles inspected.	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met	\$44	\$21
Intrusive Pole Inspections 8.1.3.7 GD_31	850 poles intrusively inspected.	Met Target: 850 poles Actual: 850 poles	Met Target: 850 poles Actual: 850 poles	Met Target: 850 poles Actual: 850 entries	Met	\$19	\$19
Substation Inspection 8.1.3.8 GD_32	144 substations inspected.	Met Target: 144 substation inspections Actual: 156 substation inspections	Met Target: 144 substation inspections Actual: 156 substation inspections	Met Target: 144 substation inspections Actual: 156 substation inspections	Met	\$283	\$111

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Equipment Maintenance and Repair (Connectors, Including Hotline Clamps) 8.1.4.3 GD_33	As needed maintenance (% of budget), pending results of inspections programs.	Missing Target: 100% of proposed spending Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: 100% of proposed spending Actual: Activity validated	Met	\$1,073	\$1,441
Asset Management and Inspection Enterprise System(s) 8.1.5 GD_34	100% of maintenance of all asset management systems.	Missing Target: 100% of maintenance activities Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: 100% of maintenance activities Actual: Activity validated	Met	\$	\$43

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Quality Assurance and Quality Control 8.1.6 GD_35	20 asset QCs on WMP work.	Met Target: 20 asset QCs on WMP work Actual: 20 asset QCs on WMP work	Met Target: 20 asset QCs on WMP work Actual: 20 asset QCs on WMP work	Met Target: 20 asset QCs on WMP work Actual: 20 asset QCs on WMP work	Met	\$20	\$22
Open Work Orders 8.1.7 GD_36	All work orders resolved within GO 95 Timeframe.	Missing Target: All work resolved within time frame Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: All work resolved within time frame Actual: Activity validated	Met	\$18	\$19

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Equipment Settings to Reduce Wildfire Risk 8.1.8.1 GD_37	Review and evaluation of system settings.	Missing Target: Review and evaluation of system settings Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Review and evaluation of system settings Actual: Activity validated	Met	\$5	\$7
Grid Response Procedures and Notifications 8.1.8.2 GD_38	Review and update procedure annually.	Missing Target: Annual review and update Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Annual review and update Actual: Activity validated	Met	\$9	\$10

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Personnel Work Procedures and Training in Conditions of Elevated Fire Risk 8.1.8.3 GD_39	Review and update procedures annually. Verifications of training annually.	Missing Target: Annual review and update Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Annual review and update Actual: Activity validated	Met	\$4	\$4
Workforce Planning 8.1.9 GD_40	Verify appropriate staffing levels for wildfire related activities.	Missing Target: Verification of appropriate staffing levels Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Verification of appropriate staffing levels Actual: Activity verified	Met	\$6	\$7

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Detailed Inspections 8.2.2.1 VM_1	51 circuit miles inspected.	Met Target: 51 circuit miles inspected Actual: 51 circuit miles inspected	Met Target: 51 circuit miles inspected Actual: 51 circuit miles inspected	Met Target: 51 circuit miles inspected Actual: 51 circuit miles inspected	Met	\$14	\$25
Patrol Inspections 8.2.2.2 VM_2	205 circuit miles inspected.	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met	\$32	\$59

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Unmanned Aerial Vehicle High-definition Photography and Videography 8.1.2.3 VM_3	205 circuit miles inspected.	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met	\$55	\$67
LiDAR Inspections 8.2.2.4 VM_4	205 circuit miles inspected.	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met	\$55	\$72

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Third Party Ground Patrol 8.2.2.5 VM_5	205 circuit miles inspected.	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met Target: 205 circuit miles inspected Actual: 205 circuit miles inspected	Met	\$44	\$21
Substation Inspection 8.2.2.6 VM_6	144 circuit miles inspected.	Met Target: 144 circuit miles inspected Actual: 156 circuit miles inspected	Met Target: 144 circuit miles inspected Actual: 156 circuit miles inspected	Met Target: 144 circuit miles inspected Actual: 156 circuit miles inspected	Met	\$4	\$15

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Pole Clearing 8.2.3.1 VM_7	Plan and execution of vegetation removal around poles per Public Resources Code section 4292.	Missing Target: Missing Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$ -	\$ -
Wood and Slash Management 8.2.3.2 VM_8	Waste Removal requirements met.	Missing Target: Waste Removal requirements met Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Waste Removal requirements met Actual: Activity validated	Met	\$419	\$454

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Clearance 8.2.3.3 VM_9	72 circuit miles cleared.	Met Target: 72 circuit miles cleared Actual: 99.5 circuit miles cleared	Met Target: 72 circuit miles cleared Actual: 100 circuit miles cleared	Met Target: 72 circuit miles cleared Actual: 100 circuit miles cleared	Met	\$1,767	\$1,935
Fall-in Mitigation 8.2.3.4 VM_10	88 trees remediated or removed to prevent fall-in.	Met Target: 88 trees Actual: 182 trees	Met Target: 88 trees Actual: 182 trees	Met Target: 88 trees Actual: 182 trees	Met	\$284	\$329
Substation Defensible Space 8.2.3.5 VM_11	13 substations inspected and cleared.	Met Target: 13 substations Actual: 13 substations	Met Target: 13 substations Actual: 13 substations	Met Target: 13 substations Actual: 13 substations	Met	\$15	\$14

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
High-risk Species 8.2.3.6 VM_12	WMP plan review and vegetation discussion with experts.	Missing Target: Plan reviewed and discussed Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Plan reviewed and discussed Actual: Activity validated	Met	\$284	\$329
Fire-resilient Right-of-Way 8.2.3.7 VM_13	WMP plan review and vegetation discussion with experts.	Missing Target: Plan reviewed and discussed Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Plan reviewed and discussed Actual: Activity validated	Met	\$14	\$16

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Emergency Response Vegetation Management 8.2.3.8 VM_14	Readiness verification and plan review.	Missing Target: Readiness verification and plan review Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Readiness verification and plan review Actual: Activity validated	Met	\$25	\$38
Vegetation Enterprise System 8.2.4 VM_15	100% monitoring and maintenance.	Missing Target: Ongoing monitoring and maintenance Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Ongoing monitoring and maintenance Actual: Activity validated	Met	\$22	\$18

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Quality Assurance and Quality Control 8.2.5 VM_16	72 vegetation QCs and 5 program audits.	Met Target: 72 vegetation QCs and 5 program audits Actual: 5 program audits	Met Target: 72 vegetation QCs and 5 program audits Actual: 5 program audits	Met Target: 72 vegetation QCs and 5 program audits Actual: 161 vegetation QCs and 5 program audits	Met	\$47	\$66
Open Work Orders 8.2.6 VM_17	All work orders resolved within GO 95 timeframe.	Missing Target: All work orders resolved within timeframe Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: All work orders resolved within timeframe Actual: Activity validated	Met	\$32	\$42

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Workforce Planning 8.2.7 VM_18	Staffing level Verified.	Met Target: Staffing Level Verified Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Staffing Level Verified Actual: Activity validated	Met	\$6	\$8
Environmental Monitoring System and Advanced Weather Monitoring and Weather Stations 8.3.2.1 SAF_1	100% monitoring and maintenance of weather stations.	Missing Target: 100% monitoring and maintenance Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: 100% monitoring and maintenance Actual: 20 weather stations maintained	Met	\$7	\$9

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Install Fault Indicators (FIs) 8.3.3.3 SAF_2	0 FIs installed. ¹⁰⁴	Met Target: 0 FIs Actual: 30 FIs	Met Target: FIs Actual: 30 FIs	Met Target: FIs Actual: 35 FIs	Met	\$77	\$271
Online Diagnostic System 8.1.2.8 SAF_3	One circuit installed per year.	Met Target: One circuit Actual: One circuit	Met Target: One circuit Actual: One circuit	Met Target: One circuit Actual: One circuit	Met	\$	\$ 17

¹⁰⁴ This initiative did not have targets for 2024. The 30 fault indicators installed correspond to BVES's 2023 WMP target, but will be accounted for in the 2024 WMP regardless.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Weather Forecasting 7.2.1 SAF_5	100% monitoring and maintenance (to keep proper functionality year-round).	Missing Target: Ongoing monitoring and maintenance Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Ongoing monitoring and maintenance Actual: Activity validated	Met	\$49	\$82
Fire Potential Index 8.3.6 SAF_6	100% monitoring and maintenance (to keep proper functionality year-round).	Missing Target: Ongoing monitoring and maintenance Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Ongoing monitoring and maintenance Actual: Activity validated	Met	\$37	\$58

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Environmental Compliance and Permitting 5.4.5 ST_1	Annual review and update of surveys and procedures.	Missing Target: Annual review and update Actual: Missing	Missing Target: Missing Actual: Activity in progress	Met Target: Annual review and update Actual: Activity validated	Met	\$25	\$31
Emergency Preparedness Plan 8.4.2.1 EP_1	Yearly review and evaluation of emergency plan.	Missing Target: Review and evaluate emergency plan Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Review and evaluate emergency plan Actual: Activity validated	Met	\$5	\$5

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
External Collaboration and Coordination 8.4.3.1 EP_2	Hold meetings with community partners and mutual aid groups.	Missing Target: Hold meetings with community partners and mutual aid groups Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Hold meetings with community partners and mutual aid groups Actual: Activity validated	Met	\$22	\$32
Public Emergency Communication Strategy 8.4.4 EP_3	Review and evaluation of communication strategy.	Missing Target: Review and evaluation of emergency program and communication strategy Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Review and evaluation of emergency program and communication strategy Actual: Activity validated	Met	\$4	\$5

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Preparedness and Planning for Service Restoration 8.4.5.1 EP_4	Update service restoration plan with operations group.	Missing Target: Review and evaluate PSPS program Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Review and evaluate PSPS program Actual: Activity validated	Met	\$6	\$6
Customer Support in Wildfire PSPS Emergencies 8.4.6 EP_5	Review and evaluate PSPS program.	Missing Target: Review and evaluate PSPS program Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Review and evaluate PSPS program Actual: Activity validated	Met	\$4	\$4

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 96	Actual Expenditure (\$ thousand)
Public Outreach and Education on Awareness Program 8.4.3.2 COE_1	360 public outreach and education events.	Met Target: 360 public outreach and education events Actual: 1,013 public outreach and education events	Met Target: 360 public outreach and education events Actual: 1,013 public outreach and education events	Met Target: 360 public outreach and education events Actual: 1,013 public outreach and education events	Met	\$93	\$148
Engagement With Access and Functional Needs Populations 8.4.4.1 COE_2	12 engagement events with Access and Functional Needs customers.	Met Target: 12 customers' needs verification Actual: 26 customers' needs verification	Met Target: 12 customers' needs verification Actual: 26 customers' needs verification	Met Target: 12 customers' needs verification Actual: 26 customers' needs verification	Met	\$31	\$60

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Collaboration on Local Wildfire Mitigation Planning 8.4.6 and 8.5.2 COE_3	Review and maintain plans, programs, and policies for collaborating with communities on local wildfire mitigation planning.	Missing Target: Continue engagement with local support (Fire Department and Forestry) on project status and other items Actual: Missing	Missing Target: Missing Actual: Missing	Met Target: Continue engagement with local support (Fire Department and Forestry) on project status and other items Actual: Activity validated	Met	\$23	\$31

96

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Best Practice Sharing with Other Utilities 8.4.6 and 8.5.2 COE_4	Attend work groups, conferences that share best practices of WMP programs.	Met Target: 15 working group and conferences Actual: 135 working group and conferences	Met Target: 15 working group and conferences Actual: 135 working group and conferences	Met Target: 15 working group and conferences Actual: 135 working group and conferences	Met	\$15	\$17

Appendix B: BVES Vegetation Management Audit Report

On February 13, 2026, Energy Safety issued its Vegetation Management Audit (VMA) Report for BVES. The VMA Report concluded that BVES achieved the objective of all 13 vegetation management initiatives described in its 2024 WMP by either completing all work associated with its WMP commitments or by providing a CAP that addressed any deficiencies identified in the VMA. The findings from Energy Safety’s VMA Report are detailed in Table 10.

A finding of “Completed” indicates that BVES provided documentation to support that all work was completed. A finding of “Achieved objective” indicates that, while Energy Safety identified some deficiencies, the majority of the work was completed and the CAP provided corrective actions that will address any remaining deficiencies.

Table 10. Energy Safety Findings from BVES 2024 VMA Report of WMP Vegetation Management Initiatives

Vegetation Management Initiative	WMP Initiative Tracking ID	VMA Report Finding
8.2.2.1 Vegetation Management Inspections	Detailed Inspection (VM_1)	Completed
8.2.2.2 Vegetation Management Inspections	Patrol Inspection (VM_2)	Completed
8.2.2.3 Vegetation Management Inspections	Unmanned Aerial Vehicle High-definition Photography/Videography Inspection (VM_3)	Completed
8.2.2.4 Vegetation Management Inspections	LiDAR Inspection (VM_4)	Completed
8.2.2.5 Vegetation Management Inspections	3rd Party Ground Patrol Inspection (VM_5)	Completed
8.2.2.6 Vegetation Management Inspections	Substation Inspection (VM_6)	Completed
8.2.3.1 Pole Clearing	Pole Clearing (VM_7) ¹⁰⁵	Achieved Objective
8.2.3.2 Wood and Slash Management	Wood Slash Management (VM_8)	Completed

¹⁰⁵ BVES references “VM_7” in the narrative of section 8.2.3.1 Pole Clearing but did not include an actual quantitative or qualitative target for 2024. The VMA Report assessed narrative commitments that were included in this section of the WMP.

Vegetation Management Initiative	WMP Initiative Tracking ID	VMA Report Finding
8.2.3.3 Clearance	Clearance (VM_9)	Completed
8.2.3.4 Fall-in Mitigation	Fall-in Mitigation (VM_10)	Completed
8.2.3.5 Substation Defensible Space	Substation Defensible Space (VM_11)	Completed
8.2.3.6 High-Risk Species	High-Risk Species (VM_12)	Completed
8.2.3.7 Fire Resilient Right-of-Ways	Fire-Resilient Right-of-Ways (VM_13)	Completed
8.2.3.8 Emergency Response Vegetation Management	Emergency Response Vegetation Management (VM_14)	Completed
8.2.4 Vegetation Management Enterprise System	Vegetation Management Enterprise System (VM_15)	Completed
8.2.5 Quality Assurance and Quality Control	Quality Assurance / Quality Control (QA/QC) (VM_16)	Completed
8.2.6 Open Work Orders	Open Work Orders (VM_17)	Achieved Objective
8.2.7 Workforce Planning	Workforce Planning (VM_18)	Achieved Objective

Appendix C: Normalizing Metrics and Raw Count Data

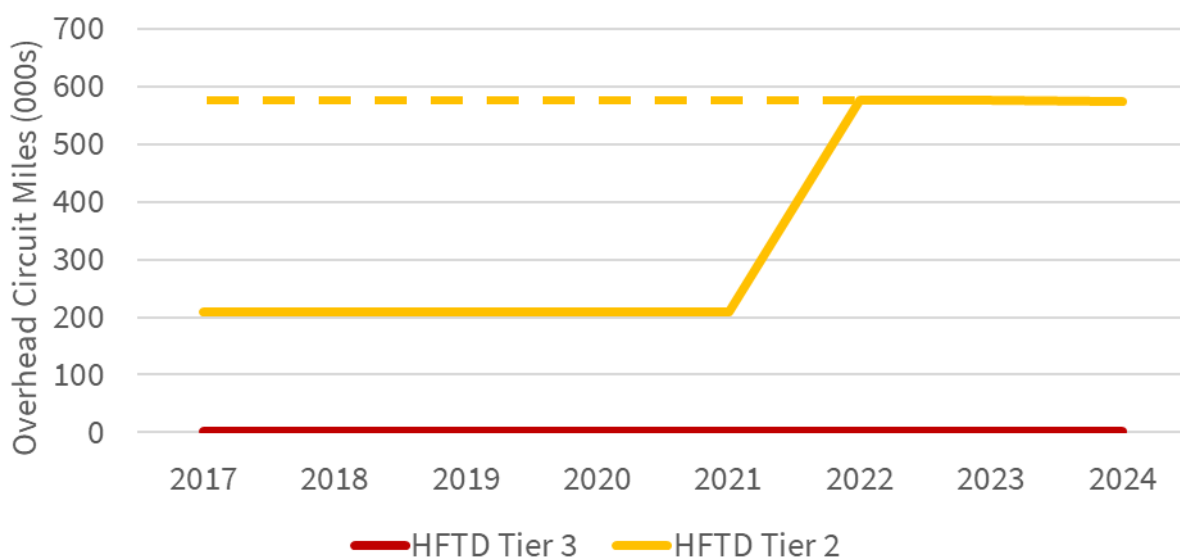
Data for this appendix comes from the 2017-2024 QDRs and the DR-285 Response, as reported by BVES.^{106, 107} Overhead circuit miles (OCM) are used to estimate rates for ignition risk metrics. Raw counts of ignition risk metrics are also presented in this appendix.

Overhead Circuit Miles

The number of overhead circuit miles (OCM) increased between 2021 and 2022 and has since remained constant. (Figure 8). However, the increase in OCM does not reflect a change in the actual OCM on BVES's system but instead is a result of the change in the reporting by BVES to include secondary line miles, as prior years only reported on primary line miles. Because of this inconsistency starting in 2022, Energy Safety has back imputed values reflecting inclusion of secondary lines miles for 2017 to 2021.

The percentage of BVES's 2024 territory in HFTD Tier 3 areas is 0.3% and HFTD Tier 2 areas is 99.7%.

Figure 8. BVES Overhead Circuit Miles (2017-2024) by HFTD Tier



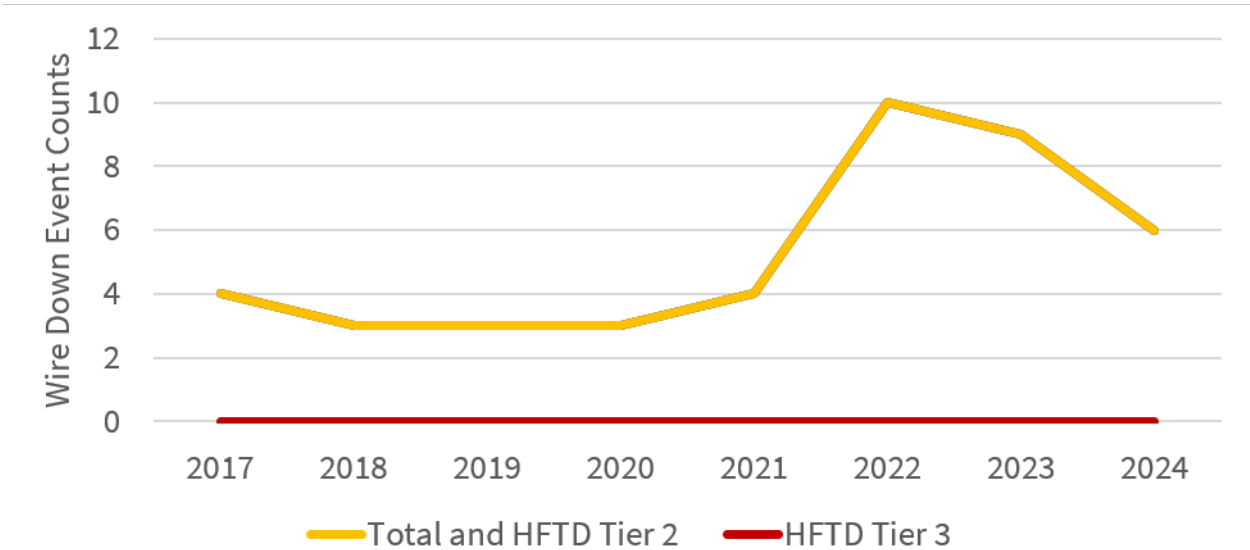
¹⁰⁶ 2017-2024 QDRs, Table 7.

¹⁰⁷ DR-285 Response, Table 4.

Raw Wire Down Event Counts

Wire down event counts remained mostly flat from 2017 to 2021 but have increased since, peaking in 2022. Wire down events in HFTD Tier 2 areas accounted for the entire total (Figure 9).

Figure 9. BVES Wire Down Event Counts (2017-2024) by HFTD Tier



Raw Outage Event Counts

BVES outage event counts declined from 2017 to 2019 before increasing moderately in subsequent years. Outage events in HFTD Tier 2 areas accounted for the entire total (Figure 10).

Figure 10. BVES Outage Event Counts (2017-2024) by HFTD Tier

