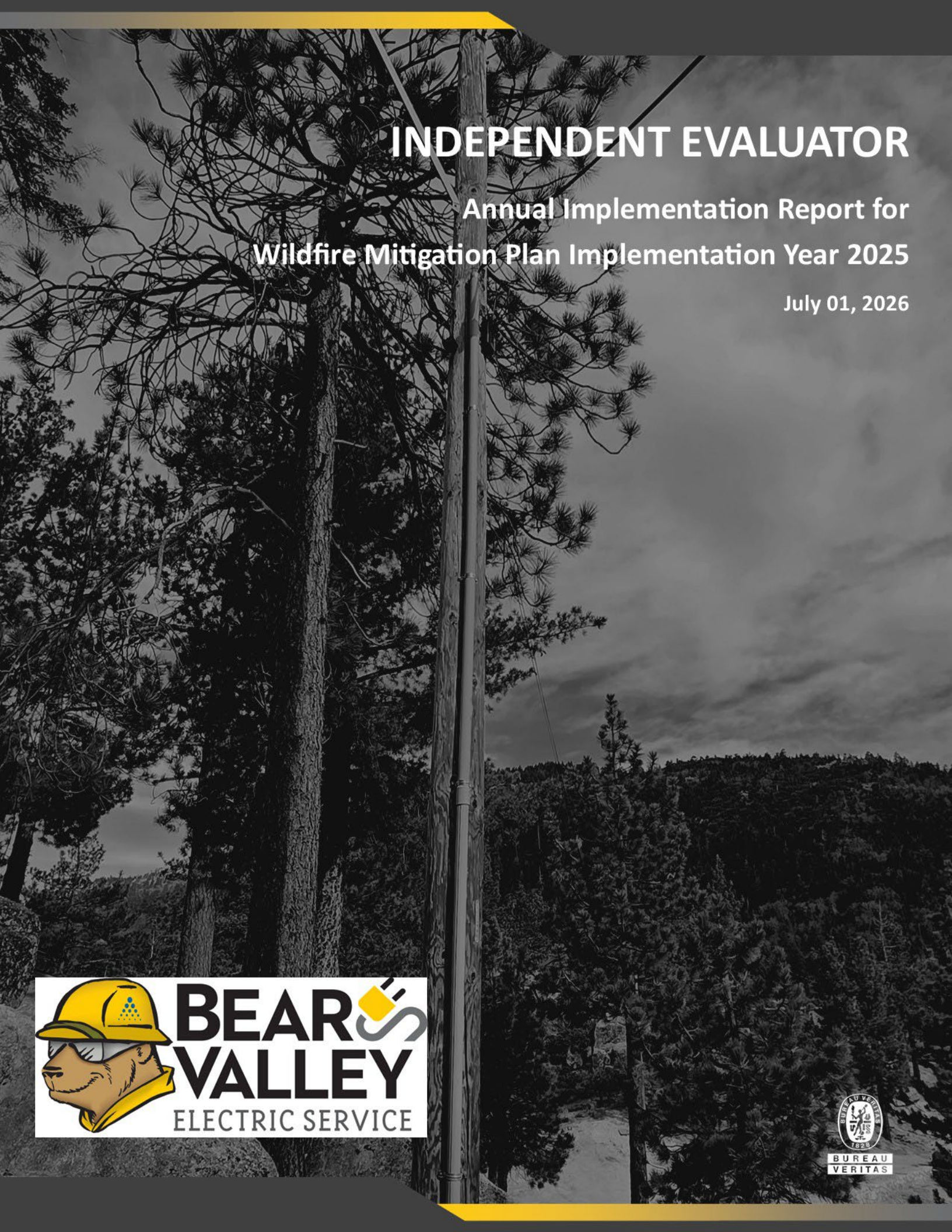

INDEPENDENT EVALUATOR

Annual Implementation Report for Wildfire Mitigation Plan Implementation Year 2025

July 01, 2026

BEAR VALLEY ELECTRIC SERVICE

BUREAU VERITAS

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DISCLAIMER

This report has been compiled through the process of observation and review of documents provided by the Electrical Corporation named herein. The Office of Energy Infrastructure Safety ("Energy Safety") instituted the requirement for an independent evaluation of Electric Corporation's Wildfire Mitigation Plans ("WMP"). Bureau Veritas is not the designer, implementer, or owner of the WMP and is not responsible for its content, implementation and/or any liabilities, obligations or responsibilities arising therefrom.

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1. EXECUTIVE SUMMARY

Background

The devastating wildfires of the past and present have taught us valuable lessons about safeguarding California's lands, particularly in areas where electrical infrastructure coexists with wildland environments. In response to these challenges, the California Public Utilities Commission (CPUC) initiated Rulemaking 18-10-007 to provide guidance on Wildfire Mitigation Plans (WMPs) for Investor-Owned Utilities (IOUs), now referred to as Electrical Corporations (ECs). These WMPs are designed to cover a three-year period, with the first cycle of independent evaluations beginning in 2020.

The 2025 WMP is part of the second three-year planning cycle. Bear Valley Electric Service's (BVES) 2023-2025 WMP builds on the previous cycle by enhancing grid hardening, improving risk assessment and prioritization, and advancing situational awareness and weather monitoring capabilities. These improvements, along with existing mitigation measures, are founded on the understanding that effective natural resource management is crucial for maintaining facilities. During the first evaluation of this cycle, which ended in 2023, BVES experienced no ignition events or conditions that would trigger a Public Safety Power Shutoff (PSPS) event. In 2024, BVES exceeded most of the WMP objectives, particularly in grid hardening, vegetation management, and community engagement. For implementation year 2025, BVES did not issue any of its own PSPS events and continued implementation of initiatives across all five WMP categories.

This Independent Evaluator (IE) Annual Implementation Report (AIR) assesses BVES's WMP commitments for implementation year 2025. The IE AIR reviews the WMP initiatives as outlined for 2025 and evaluates BVES's performance in meeting committed objective targets, implementing QA/QC programs, and distributing funding to mitigation efforts described within the WMP.

Pursuant to Public Utilities Code Section 8386.3(c)(2)(B)(i), (ii), (iii), and (iv), Bureau Veritas North America, Inc. (BVNA), in partnership C2 Group, has been selected as the IE to review and assess BVES's 2025 WMP in its entirety. This IE AIR will present BVNA's findings and results for review. BVNA was included in the Office of Energy Infrastructure and Safety (Energy Safety) Independent Evaluator List for 2025 WMPs, dated December 18, 2025, in accordance with Public Utilities Code section 8386.3(c)(2)(A).

In compliance with Energy Safety's requirements, BVES has contracted BVNA to provide the IE assessment. This assessment includes the IE responsibilities outlined in Public Utilities Code section 8386.3(c)(5)(C), which involve performing the following tasks:

- Task 1: Consult with Energy Safety on implementation assurance auditing that will be performed
- Task 2: Perform implementation assurance auditing, including field inspections
- Task 3: Draft and provide Energy Safety a report on audit findings, including deficiencies of underfunded WMP activities
- Task 4: Draft and provide Energy Safety a report on deficiencies of electrical corporations
- Task 5: Track and report deficiencies of audit findings

The evaluation process began with an Energy Safety kick-off meeting, which served as an introduction between BVES representatives, BVNA staff, and assigned Energy Safety personnel. This introductory meeting established key elements, including communication and documentation protocols, as well as the identification of individuals responsible for receiving requests from the IE. Following this meeting, the IE initiated a review of BVES's 2025 WMP and related publicly available documents, as listed in Section 7. This review aimed to identify BVES's stated goals within the 2025 WMP.

To evaluate activities described in the WMP that were not available in public records, BVNA's team of evaluators submitted data requests and conducted interviews with Subject Matter Experts (SMEs). These steps helped verify activities stated within the 2023-2025 WMP (see Section 7 for a list of Data Requests/SME Interviews). Detailed analysis and key findings for each respective category are presented in the following sections of this report.

The IE has classified each activity as "Validated," "Not Validated", or "Not Applicable." "Validated" indicates that the EC has clearly demonstrated meeting the stated WMP target for the review year or continues to implement the activity as outlined. "Not Validated" means the EC either failed to provide sufficient documentation to support their claim of implementation or did not meet the WMP target; the individual reviews will elaborate and make the distinction. "Not Applicable" signifies that the EC has determined the activity is not relevant to the current review period.

BVNA's understanding of collected utility strategies demonstrated throughout the state is summarized below:

1. **Inspection and maintenance of distribution, transmission, and substation** includes a comprehensive approach conducting system patrols and ground inspections using advanced technological tools, managing predictive and electrical preventative maintenance, performing vegetation inspections and management, implementing vulnerability detection methods such as Light Detection and Ranging (LiDAR) inspection, and utilizing geospatial and topography identification along with geographic information system (GIS) mapping data. A key aspect of these programs is the identification and collection of data elements through each initiative. Understanding how this data is used and shared is essential for improving utility practices and enhancing overall wildfire mitigation efforts.
2. **System hardening** includes pole replacement, non-expulsion equipment, advanced fuses, tree attachment removal, less flammable transformer oil, covered wire, and undergrounding where it is supported by a cost benefit analysis.
3. **De-energization** actions are triggered and prioritized based on various fire weather conditions such as forecasted, imminent, and validated extreme fire weather conditions. Plans for re-energization when weather conditions subside to safe levels are implemented. Both manual and automatic capabilities to implement the de-energization and re-energization process exist.

4. **Advanced Technologies** include Distribution Fault Anticipation (DFA) technology, tree growth regulators, pulse control fault interrupters, oblique and hyperspectral imagery, advanced transformer fluids, advanced LiDAR systems, and advanced Supervisory Control and Data Acquisition (SCADA) systems. These technologies help reduce risk of electrical ignition, mitigate power outages, and prevent equipment damage.
5. **Vegetation management**, including routine preventative vegetation maintenance; corrective vegetative management and off-cycle tree work; emergency vegetation clearance, prioritized for portions of the service territory in Tier 2 and 3 HFTD; quality control processes; and resource protection plan, including animal and avian mitigation programs. Enhanced Vegetation Management (EVM) with enhanced inspections, aims to keep all aspects of trees away from power lines and to prescribe minimum clearances that exceed state standards. EVM conducts supplementary inspections in addition to standard patrol routines to identify and address dead, diseased, or declining trees near power lines, ensuring they are removed or managed before they pose a risk to electrical infrastructure.
6. **Situational Awareness** involves gathering real-time information from various sources to create a comprehensive understanding of current conditions. This includes data from devices and sensors on electrical systems, weather monitoring equipment, and other tools that assess wildfire conductivity conditions. Utilization of programs such as online feeds and websites like the National Fire Danger Rating System (NFDRS) help the EC employ risk-informed, data-supported decision-making processes. The goal of these situational awareness efforts is to achieve a shared understanding of actual conditions amongst all stakeholders, thereby improving collaborative planning and decision-making.
7. **Emergency Preparedness, Outreach, and Response** efforts engage a wide range of key stakeholders, including critical facilities, customers, local government, and essential agencies such as CAL FIRE. Strong communication channels are employed with local law enforcement agencies, first responders, hospitals, local emergency planning committees, other utility providers, and the California Independent System Operator. Coordination agreements such as mutual Aid or Assistance, as well as a community outreach plan is in place to inform and engage the various stakeholders.
8. **Operational practices** include communication protocols, and the execution of specific plans designed to minimize fire danger. A key element of this approach is the strategic deactivation of automatic reclosers during high-risk periods. De-energization decisions are based on a multifaceted risk assessment that consider various factors, including the type of facility, tree and vegetation density, the presence of available dry fuel, and other location specific vulnerabilities to wildfire risk.

Introduction to Bear Valley Electric Service

Bear Valley Electric Service, Inc., often referred to as BVES or Bear Valley, is a subsidiary of American States Water Company. Bear Valley serves a 32-square-mile territory in Southern California, located in the San Bernardino Mountains, 80 miles east of Los Angeles. The service area encompasses the mountain communities surrounding Big Bear City and Big Bear Lake. The entire service territory is situated above 3,000 feet in elevation, with approximately 90% classified

as High-Fire Threat District (HFTD) Tier 2 and 10% as HFTD Tier 3. According to the National Fire Danger Rating System (NFDRS), the service area is considered "Very Dry" or "Dry" over 75% of the time. This persistent dry condition, combined with heavy vegetation, results in a high level of available fuel, significantly increasing the potential severity of wildfires in the region. Bear Valley has 50 employees, and 24,691 customers. There are 13 substations and a total of 9,156 poles, along with 267.1 total circuit miles with 206.7 being overhead and 60.4 being underground.

Throughout the 2023-2025 three-year cycle of the WMP, Bear Valley's primary objective is to construct, maintain, and operate its electric line and equipment in a way that minimizes the risk of catastrophic wildfire. This goal is pursued through ongoing initiatives that aim to reduce threats of utility-caused wildfires by eliminating sources of ignition, and to increase resilience of their assets and provide emergency and restoration response in the event of a wildfire affecting the service area.

Key Findings

Non-Field Verified Key Findings:

Invalidated Initiatives. Ten initiatives (14%) were not validated, primarily due to data quality issues, major project deferrals, and documentation gaps. Inspection program shortfalls were identified across multiple initiatives. The GD_25 Detailed Inspection Program achieved only 49 of 53 circuit miles verified (92%, below the 95% threshold), GD_29 LiDAR Inspections reached 187 of 205 circuit miles verified (91%, below threshold), VM_1 Detailed Inspections completed 49 of 53 circuit miles verified (92%, below threshold), VM_4 LiDAR Inspections achieved 187 of 205 circuit miles verified (91%, below threshold), and VM_11 Substation Defensible Space verified only 11 of 13 substations (85%, below threshold). Major project deferrals significantly impacted the Grid Design category. The GD_10 Bear Valley Solar Energy Project obtained CPUC approval on December 18, 2025, but completion was deferred to 2027, resulting in a 94.8% budget underspend. Similarly, the GD_11 Energy Storage Project obtained CPUC approval on December 18, 2025, but completion was deferred to 2027, resulting in a 99.7% budget underspend. Both projects represent regulatory-timing deferrals outside BVES control. Documentation and timeline issues affected several initiatives. GD_36 Open Work Orders lacked sufficient documentation of GO 95 Rule 18 compliance. EP_4 Service Restoration Planning contained a logical inconsistency, claiming a March 2025 update incorporated lessons from June 2025 exercises. EP_5 Customer Support completed its annual review in July 2025, missing the April 2025 WMP deadline.

Field Verified Key Findings:

Field Finding 1 - Principal physical mitigation work was validated across the field-sampled population. The IE validated every field-verifiable initiative within scope that had reported 2025 implementation work. Reported completion met or exceeded the WMP targets for covered conductor installation (7.73 of 5.10 circuit miles under GD_1), distribution pole replacement (123 of 100 poles under GD_4), evacuation-route wood-pole wire-wrap mesh hardening (851 of 500 poles under GD_6), fuse TripSaver automation under GD_15 (73 units reported in the 2025 EC

AIR against the 50 unit 2025 target under GD_15),[1] tree attachment removal (110 of 100 attachments under GD_19), fall-in mitigation (164 of 88 trees under VM_10), and met the unit-count or single-facility targets for substation automation (3 of 3 under GD_12), switch and field-device automation (11 of 11 under GD_13), capacitor bank replacement (6 of 6 within the 2025 scope under GD_14), the Server Room Build-Out under GD_16, and the eight customer- and local-government-driven minor undergrounding locations under GD_3. Three additional field-verifiable initiatives (GD_2 Radford conductor, GD_5 Radford poles, and GD_17 Distribution Management Center) had no 2025 implementation population and are recorded as Not Applicable for the year, with their underlying work completed in 2024.

Field Finding 2 - Workmanship and implementation observations were isolated and did not move any initiative determination. The IE recorded a small number of sample-level exceptions across the field-verified population; none brought an Initiative Validation Rate below the 95 percent threshold. The exceptions include one pole at the reported GPS coordinates under GD_4 that had not been replaced as part of the 2025 program (1 of 81 sampled, yielding a 98.8 percent Sample Validation Rate); two GD_6 locations without wire-wrap mesh installation and one location with observable mesh damage (yielding 98.7 percent across the 149 sampled location, with the damaged-mesh location treated as a workmanship observation rather than a validation failure); and one GD_19 location where the field asset was a tree rather than a distribution pole with no attachment-removal work observed (yielding 98.6 percent across the 74 verifiable locations among the 78 sampled). Each affected initiative remained Validated. The IE records these as sample-level items for BVES to review against its work-completion records.

Field Finding 3 - The principal recurring field-level theme is asset-data consistency between BVES's GIS records and the in-field assets. Pole-tag, Structure-ID, and GPS-coordinate discrepancies between BVES's frontloaded GIS data and field-observed equipment appeared across multiple sampled initiatives, including GD_4, GD_13, GD_15, and GD_19. The observed patterns include in-field pole tags that did not match the reported Structure IDs at three GD_15 TripSaver locations, three GD_19 attachment locations, one GD_4 pole location, and one GD_13 switch location; one GD_13 location where the pole could not be identified at the reported GPS coordinates after checking surrounding poles; and two GD_19 duplicate Structure IDs with differing GPS coordinates. Separately, two GD_19 locations could not be directly verified because the in-field assets sit within customer-controlled backyards. The IE records the recurring asset-tag, Structure-ID, and GPS-coordinate items as a source-control consistency observation for BVES's GIS records rather than a workmanship finding.

[1] The 2025 EC AIR figure of 73 includes 23 units installed under the 2024 program and finalized in early 2025. One unit at pole 14000BV was removed after installation due to amperage issues, yielding 49 units installed in the 2025 program year. This is described in more detail in Section 4.1.2.1, Initiative Review for GD_15.

Funding Verification Key Findings:

Funding Finding 1 – Material variances are common in 2025 but do not, in the aggregate, indicate reduced implementation. Of the 63 initiatives subject to funding-variance review across the five WMP categories, 56 (88.9 percent) carried an absolute percent difference greater than 10 percent against the 2025 planned spend filed in the 2023-2025 WMP. Reconciled to the 2025 EC AIR, the Quarterly Data Reports, and BVES's responses to BVES_DR004 and BVES_DR004.b, the majority of these variances are explained by regulatory-timing deferral, board-authorized scope acceleration, cost-allocation conventions across paired initiatives, contractor-procurement effects, small-base labor forecasting, and prior-year accruals invoiced in 2025, rather than by program underperformance.

Funding Finding 2 - Two regulatory-timing deferrals account for the largest single source of category variance and are schedule effects outside BVES's control. The Bear Valley Solar Energy Project (GD_10) and the Energy Storage Project (GD_11) were deferred pending CPUC approval that issued on December 18, 2025, producing 2025 variances of -$12,876.2K (-94.8 percent) and -$10,309.5K (-99.7 percent) respectively; both projects are carried into the 2026-2028 WMP. Excluding these two deferrals, the Grid Design category's remaining initiatives spent $17,648.9K against $10,506.7K planned, reflecting board-authorized scope acceleration on the covered-conductor program (GD_1 at +$3,732.1K, +202.8 percent; GD_4 at +$1,599.5K, +202.8 percent) under the April 2025 unanimous written consent (UWC) capital authorization, rather than runaway cost on the underlying scope.

Funding Finding 3 – Field and funding evidence largely corroborate, with VM_11 the principal adverse correlation. Field-validated initiatives that exceeded their WMP targets predominantly show overspends explained by accelerated or expanded in-scope work (GD_1, GD_4, GD_13, GD_14, GD_15, GD_19), and validated initiatives at or near target with favorable contracted-services procurement show modest underspends (GD_27, GD_28 and VM_3, GD_30 and VM_5). The one adverse correlation the IE identifies is VM_11 Substation Defensible Space, where the underspend of 39 percent paired with the Not Validated implementation finding (eleven of thirteen substations supported in records); the IE reports the pairing directly rather than treating the underspend as a routine procurement effect.

Funding Finding 4 - Two 2025 EC AIR Attachment D reporting items require errata. GD_23 Safety and Technical Upgrades to Lake Substation is omitted from the 2025 EC AIR Attachment D despite $1,374,524 of 2025 spend confirmed in BVES_DR001 and acknowledged in BVES_DR004 Item 10 and BVES_DR004.b as a clerical reporting error. GD_29 LiDAR Inspection reports a 2025 actual of $76,200 in 2025 EC AIR Attachment D, which the IE corrects to $85,366 against the validated Davey LiDAR invoices (totaling $170.7K, split 50/50 with VM_4), and the corrected variance is approximately 0.0 percent against the $85.4K planned amount. The IE carries both items to the Executive Summary as filed-AIR errata and recommends BVES file a corrected Attachment D adding GD_23 with its planned amount, 2025 actual, and variance driver, and restating the GD_29 actual to $85.4K.

Initiatives Completed Within 5% of the WMP Targets: 57 Total Number of Initiatives (77% of all BVES Initiatives)

Table 1: List of Initiatives that Missed Target or Could Not Be Validated

Initiative Number, WMP Section Number, and Name	Missed Target or Could Not Be Validated
GD_10, 8.1.2.7, Bear Valley Solar Energy Project, Microgrids	Missed Target
GD_11, 8.1.2.7, Energy Storage Project, Microgrids	Missed Target
GD_25, 8.1.3.1, Detailed Inspection Program	Could Not Be Validated
GD_29, 8.1.3.1, LiDAR Inspection	Could Not Be Validated
GD_36, 8.1.7, Open Work Orders	Could Not Be Validated
VM_1, 8.2.2.1, Detailed Inspections	Could Not Be Validated
VM_4, 8.2.2.1, LiDAR Inspection	Could Not Be Validated
VM_11, 8.2.3.5, Substation Defensible Space	Could Not Be Validated
EP_4, 8.4.5.1, Preparedness & Planning for Service Restoration	Could Not Be Validated
EP_5, 8.4.6, Customer Support in Wildfire & PSPS Emergencies	Could Not Be Validated

Table 2: Initiatives with Absolute % Budget Differences > 10%: 62 Total Number of Initiatives (84% of all BVES Initiatives)

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
GD_1, 8.1.2.1, Covered Conductor Replacement Project	$1,840.60	$5,572.70	202.8%
GD_2, 8.1.2.1, Radford Line Replacement Project	$0.00	$117.10	100.0%
GD_3, 8.1.2.2, Minor Undergrounding Upgrades Projects	$301.20	$172.60	-42.7%
GD_4, 8.1.2.3, Distribution Pole Replacements & Reinforcements	$788.80	$2,388.30	202.8%
GD_5, 8.1.2.3, Radford Line Replacement Project	$0.00	$50.20	100.0%
GD_6, 8.1.2.3, Evacuation Route Hardening Project	$794.10	$540.40	-31.9%
GD_8, 8.1.2.5, Traditional overhead hardening	$803.30	$1,011.50	25.9%
GD_10, 8.1.2.7, Bear Valley Solar Energy Project, Microgrids	$13,578.40	$702.20	-94.8%
GD_11, 8.1.2.7, Energy Storage Project, Microgrids	$10,342	$32.50	-99.7%
GD_12, 8.1.2.8, Substation Automation	$640.20	$364.40	-43.1%

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
GD_13, 8.1.2.8, Switch and Field Device Automation	$640.20	$1,370.60	114.1%
GD_14, 8.1.2.8, Capacitor Bank Upgrade Project	$311.50	$594.10	90.7%
GD_15, 8.1.2.8, Fuse TripSaver Automation	$133.60	$400.40	200%
GD_16, 8.1.2.8, Server Room	$0.00	$42.60	100.0%
GD_17, 8.1.2.8, Distribution Management Center	$0.00	$11.90	100.0%
GD_19, 8.1.2.10, Tree Attachment Removal Project	$592.70	$861.90	45.4%
GD_21, 8.1.2.12, BVPP Phase 4 Upgrade Project	$0.00	$79.50	100.0%
GD_23, 8.1.2.12, Safety and Technical Upgrades to Lake Substation	$0.00	$1,374.52	100.0%
GD_25, 8.1.3.1, Detailed Inspection Program	$14.30	$31.30	118.9%
GD_26, 8.1.3.2, Patrol Inspection Program	$33.40	$73	118.6%
GD_27, 8.1.3.3, UAV Thermography	$74.10	$61.30	-17.3%
GD_28, 8.1.3.4, UAV/HD Photography/ Videography	$74.10	$59.50	-19.7%
GD_29, 8.1.3.1, LiDAR Inspection	$85.40	$76.20	-10.8%
GD_30, 8.1.3.6, 3rd Party Ground Patrol	$61.50	$16.40	-73.3%
GD_31, 8.1.3.7, Intrusive Pole Inspections	$19.70	$38.40	94.9%
GD_32, 8.1.3.8, Substation Inspections	$291.70	$335.20	14.9%
GD_33, 8.1.4.3, Equipment Maintenance & Repair	$1,105.40	$1,352.20	22.3%
GD_34, 8.1.5, Asset Management & Inspection Enterprise System(s)	$59.40	$46	-22.6%
GD_35, 8.1.6, Asset Quality Assurance/Quality Control	$20.90	$27.60	32.1%
GD_36, 8.1.7, Open Work Orders	$18.30	$24.20	32.2%

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
GD_37, 8.1.8.1, Equipment Settings to Reduce Wildfire Risk	$5.20	$6.90	32.7%
GD_38, 8.1.8.2, Grid Response Procedures & Notifications	$9.20	$12.10	31.5%
GD_39, 8.1.8.3, Personnel Work Procedures & Training in Conditions of Elevated Fire Risk	$3.90	$5.20	33.3%
GD_40, 8.1.9, Workforce Planning	$6.50	$8.60	32.3%
ST_1, 5.4.5, Environmental Compliance & Permitting	$26.20	$34.50	31.7%
VM_1, 8.2.2.1, Detailed Inspections	$14.30	$31.30	118.9%
VM_2, 8.2.2.1, Patrol Inspections	$33.40	$73	118.6%
VM_3, 8.2.2.1, UAV HD Photography/Videography	$74.10	$59.50	-19.7%
VM_4, 8.2.2.1, LiDAR Inspection	$76.20	$85.40	12.1%
VM_5, 8.2.2.1, 3rd Party Ground Patrol	$61.50	$16.40	-73.3%
VM_6, 8.2.2.1, Substation inspections	$4.50	$5.10	13.3%
VM_11, 8.2.3.5, Substation Defensible Space	$15.90	$9.70	-39.0%
VM_13, 8.2.3.7, Fire-Resilient Rights-of-way	$14.90	$17.90	20.1%
VM_14, 8.2.3.8, Emergency Response Vegetation Management	$29.70	$37.70	26.9%
VM_15, 8.2.4, Vegetation Management Enterprise System	$22.30	$19.70	-11.7%
VM_16, 8.2.5, Vegetation Management Quality assurance/Quality Control	$52.50	$68.80	31.0%
VM_17, 8.2.6, Vegetation Management Open Work Orders	$36.80	$46	25.0%
VM_18, 8.2.7, Vegetation Management Workforce planning	$6.50	$8.60	32.3%
SAF_1, 8.3.2, Advanced Weather Monitoring and Weather Stations	$7.50	$57.40	665.3%
SAF_2, 8.3.3, Install Fault Indicators	$0.00	$279.00	100.0%

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
SAF_5, N/A, Technosylva Contractor Program	$67.50	$79.40	17.6%
SAF_6, N/A, Fire Potential Index	$50.90	$64.80	27.3%
RMA_1, 8.3.5.1, Technosylva Contractor Program	$84.80	$378.40	346.2%
WMSD_1, 8.3.3.4, Evaluating Mitigation Initiatives	$31.40	$41.40	31.8%
EP_1, 8.4.2.1, Emergency Preparedness Plan	$5	$6.60	32.0%
EP_2, 8.4.3.1, External Collaboration & Coordination	$22.70	$30.80	35.7%
EP_3, 8.4.4, Public Emergency Comms. Strategy	$4.40	$5.90	34.1%
EP_4, 8.4.5.1, Preparedness & Planning for Service Restoration	$6	$7.90	31.7%
EP_5, 8.4.6, Customer Support in Wildfire & PSPS Emergencies	$3.70	$4.80	29.7%
COE_1 ,8.5.2, Public Outreach & Education Awareness Program	$95.50	$131.10	37.3%
COE_2 ,8.5.3, Engagement with Access and Functional Needs Populations	$31.80	$41.60	30.8%
COE_3 ,8.5.4, Collaboration on Local Wildfire Mitigation Planning	$24	$30.50	27.1%
COE_4 ,8.5.5, Best Practice Sharing with Other Utilities	$15.70	$20.70	31.8%

Recommendations

Strengthen the documentation that substantiates reported scope. Four initiatives did not reach the validation threshold, in each case because the documentation available for review did not fully substantiate the reported quantity rather than because of any issue identified in the field sample. The sampled records validated at 100 percent, while the circuit list available accounted for 49 of the 53 reported circuit miles for GD_25 and VM_1 and 187 of the 205 reported for GD_29 and VM_4. VM_11 could not be validated because a record for the Village Substation was not available for review. The IE recommends that BVES consider adding a circuit-mile field to its inspection exports so the circuits represented reconcile to the mileage reported in the AIR and QDR, providing the Village Substation defensible-space record, and developing an approach for evidencing work on assets where direct field access is not available.

BVES should provide documented verification that all open work orders were resolved within GO 95 Rule 18 timeframes (GD_36), provide a copy of the updated Service Restoration Plan with revision date explicitly linking to training exercises (EP_4), and document completion status for Village Substation defensible space work (VM_11). This addresses the Not Validated initiatives

where documentation gaps prevented full verification of claimed work. BVES should require contractor attestation that waste is properly handled per contract requirements (VM_8), align WMP targets with actual program implementation or update Section 8.2.3.6 objectives (VM_12), and explicitly detail events where communication strategy is reviewed for accountability (EP_3). This addresses minor documentation gaps in validated initiatives to strengthen future audits and enhance transparency in program execution.

Strengthen consistency of asset identification across systems and the field. A recurring theme across the verification work is some inconsistency in how the same asset is identified across BVES's records and against field equipment, including pole-tag and Structure-ID differences at GD_15, GD_19, GD_4, and GD_13 locations, two GD_19 duplicate Structure IDs with differing coordinates, one GD_13 pole that could not be located at its reported coordinates, pole numbers on the database export that did not match the ResourceKeeper records (GD_27, GD_28, VM_3), pole-tag photos marked present in the export but not found in ResourceKeeper, and inspection and maintenance records issued without completion dates (GD_32, SAF_1). The IE recorded these as source-control and recordkeeping observations that did not change any initiative determination, and recommends that BVES consider reconciling asset identifiers across GIS, ResourceKeeper, and the field to a single authoritative value, and capturing completion dates and supporting photographs on its records, ideally before frontload data is issued in future cycles.

Provide updated AIR Attachment D and Table 6 entries. AIR Attachment D does not currently include GD_23 (Lake Substation), which BVES_DR001 reports at $1,374,524 of 2025 spend, and it reports the GD_29 LiDAR actual as $76,200, which the validated invoices place at $85,366. The IE recommends that BVES provide an updated Attachment D that includes GD_23 with its planned amount, 2025 actual, and variance driver, restates the GD_29 actual to $85.4 thousand, and updates the Table 6 VM_19 (AiDash) actual to $8.6 thousand.

Strengthen forecasting and initiative-level variance tracking for the 2026 through 2028 cycle. BVES noted in BVES_DR004 Item 4 that variance is tracked at the category rather than the initiative level, so several reported cost compositions are presented as directional estimates, and a recurring small-base OPEX pattern was observed across the inspection, maintenance, and procedural line items in every category (GD_25 through GD_40, the comparable VM lines, SAF_1, and the full Emergency Preparedness and Community Outreach categories), where targets were met or exceeded but modest dollar increases on small budgets produced large percentage variances. Building on BVES's commitment in BVES_DR004 Item 11, the IE recommends that BVES consider tracking variance at the initiative level and refining its forecasting approach for these small-base items in the 2026 through 2028 cycle, which would help planned-to-actual differences be more readily substantiated.

Clarify cost-allocation conventions and the treatment of shared costs. Several variances reflect allocation conventions rather than performance, including evacuation-route fire-wrap booked to GD_4 and GD_19 rather than GD_6, substation automation booked to rebuild budgets rather than GD_12, and enterprise-software and SaaS costs allocated to the WMP where the allocation basis was not documented (GD_34, VM_15, VM_19). The IE recommends that BVES consider describing these allocation conventions in the 2026 AIR and confirming that the shared inspection

engagements (VM_1 through VM_5, which mirror GD_25, GD_26, GD_28, GD_29, and GD_30) are reflected once in the category roll-ups.

Present an accrual view and a lifecycle view for multi-year carryovers. Several $0-budget initiatives reflect prior-year work invoiced in 2025 (GD_2, GD_5, GD_16, GD_17, GD_21, and SAF_2), and the SAF_2 fault-indicator program shows an approximate $569,777 lifecycle actual against a $282,080 WMP forecast. The IE recommends that BVES consider presenting an accrual view that maps these prior-year services to the year the work was performed and a lifecycle view for the multi-year carryover initiatives, together with a reconciliation of the prior-year ground-patrol invoice paid in 2025 (GD_30 and VM_5).

2. FOCUS INITIATIVES AND DISCUSSION

For WMP Implementation Year 2025, Energy Safety instructed the IE to select up to fifteen initiatives for a "focused" more thorough analysis. These "Focus Initiative" were chosen by BVNA based on several key factors.

First, the IE considered the number and nature of "Notice of Violations" (NOVs) and "Notice of Nonperformance" (NONs) received by the EC in 2025, prioritizing initiatives related to these violations to verify implementation efforts. Funding allocation was another crucial consideration, with initiatives receiving the highest planned or actual expenditure being selected. Additionally, initiatives showing significant variance (~20%) between planned and actual spending were generally chosen, especially if target goals were not met. The WMP Risk Impact Percentage was also evaluated to assess each initiative's potential for fire risk reduction. Historically, grid hardening and vegetation management initiatives have proven most effective in mitigating fire risks and typically comprise the majority of Focus Initiatives. The specific fifteen initiative selected by BVNA for focused analysis are listed in Table 3 below. This approach to initiative selection ensures a thorough evaluation of the EC's most critical and impactful wildfire mitigation efforts.

Table 3: List of Focus Initiatives

No.	Initiative Number, WMP Section Number, and Name
1	GD_1, 8.1.2.1, Covered Conductor Replacement Project
2	GD_2, 8.1.2.1, Covered Conductor - Radford Line Replacement Project
3	GD_4, 8.1.2.3, Distribution Pole Replacements & Reinforcements
4	GD_6, 8.1.2.3, Evacuation Route Hardening Project
5	GD_10, 8.1.2.7, Bear Valley Solar Energy Project, Microgrids
6	GD_11, 8.1.2.7, Energy Storage Project, Microgrids
7	GD_13, 8.1.2.8, Switch and Field Device Automation
8	GD_15, 8.1.2.8, Fuse TripSaver Automation
9	GD_19, 8.1.2.10, Tree Attachment Removal Project
10	GD_23, 8.1.2.12, Safety and Technical Upgrades to Lake Substation
11	VM_1, 8.2.2.1, Detailed Inspections
12	VM_2, 8.2.2.1, Patrol Inspections
13	SAF_1, 8.3.2, Advanced Weather Monitoring and Weather Stations
14	SAF_2, 8.3.3, Install Fault Indicators
15	RMA_1, 8.3.5.1, Technosylva Contractor Program

3. SITE AND SAMPLE SELECTION AND DISCUSSION

Table 4: List of Field Verified Initiatives

No.	Initiative Number, WMP Section Number, and Name
1	GD_1, 8.1.2.1, Covered Conductor Replacement Project
2	GD_2, 8.1.2.1, Radford Line Replacement Project
3	GD_3, 8.1.2.2, Minor Undergrounding Upgrades Projects
4	GD_4, 8.1.2.3, Distribution Pole Replacements & Reinforcements
5	GD_5, 8.1.2.3, Radford Line Replacement Project
6	GD_6, 8.1.2.3, Evacuation Route Hardening Project
7	GD_12, 8.1.2.8, Substation Automation
8	GD_13, 8.1.2.8, Switch and Field Device Automation
9	GD_14, 8.1.2.8, Capacitor Bank Upgrade Project
10	GD_15, 8.1.2.8, Fuse TripSaver Automation
11	GD_16, 8.1.2.8, Server Room
12	GD_17, 8.1.2.8, Distribution Management Center
13	GD_19, 8.1.2.10, Tree Attachment Removal Project
14	VM_10, 8.2.3.4, Fall-in Mitigation

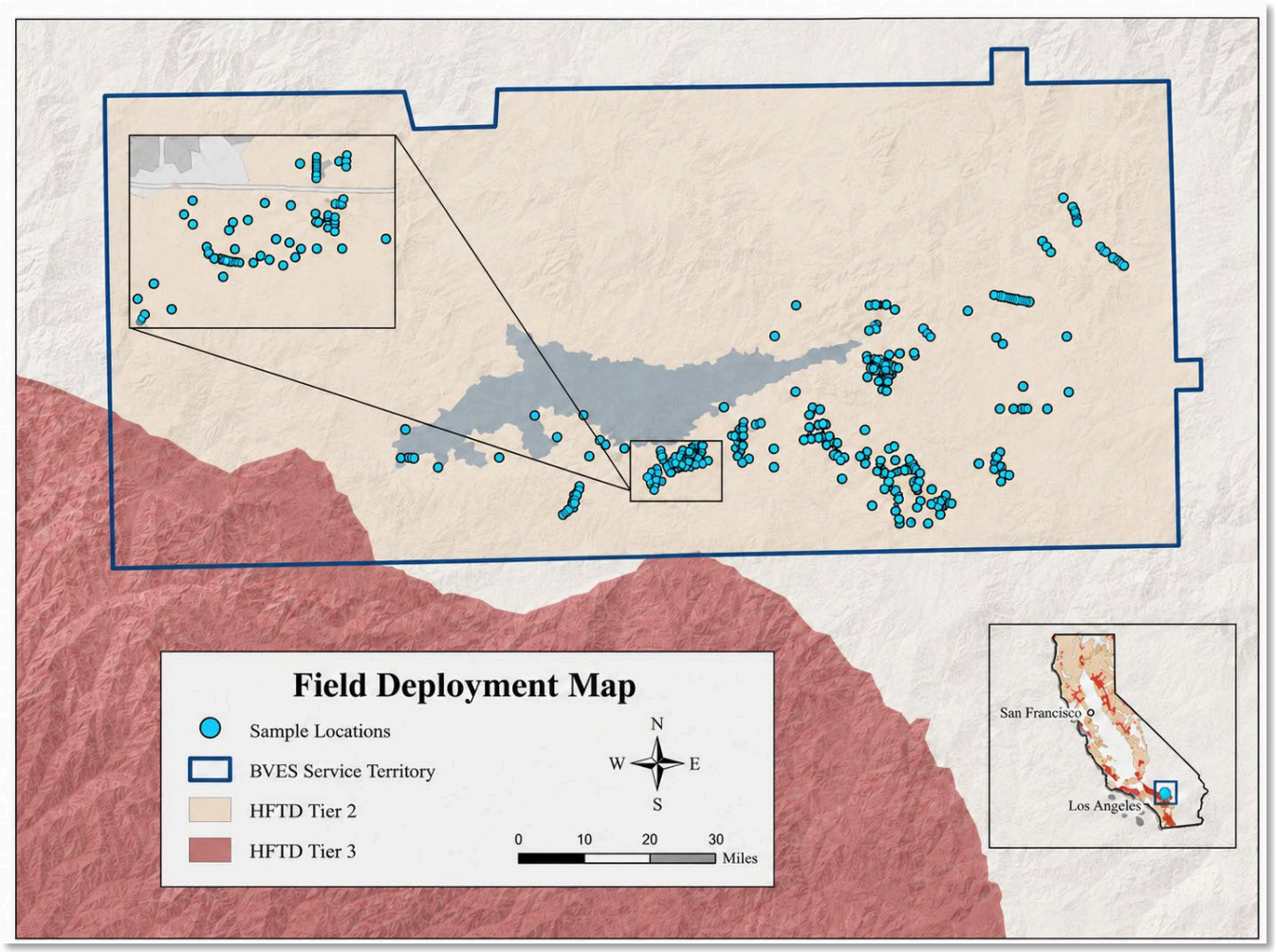
Sample Location Methodology

BVNA utilized random sampling for Bear Valley Electric Service based upon a simplified version of Cochran's Sample Size Formula. Utilization of this formula helps determine the appropriate sample size required to achieve a desired level of precision and confidence in the results – this ensures that the sample is representative of the larger population. By specifying a confidence level for the EC's individual initiatives based upon historical trends and data, mainly previous year's validation rates, the conclusions drawn from the sample data have a higher degree of statistical confidence. This confidence rate ranged from 85% and 95%, and if the previous year's validation rate fell outside of this range, the low or high end was utilized. For example, if the prior year sample validation rate was 96%, then 95% was used, if the previous year sample validation rate was 84%, then 85% was used. If no information on the prior year's sample validation rate exists, then 90% was used, unless other factors influenced that determination.

Whether or not an initiative was classified as Focus or non-Focus also affected the number of samples required for a given initiative. For Focus Initiatives, the margin of error (MOE) was set at 5% and for non-Focus Initiatives, the MOE was set at 10%. Although there is only a 5% difference between these two MOEs, the difference in sample size produced when utilizing these two MOE values is quite significant. As the margin of error *increases*, the required sample size decreases because a larger margin of error allows for *more* variability in the sample, requiring fewer samples to achieve the desired level of precision. As the margin of error *decreases*, the opposite happens because a smaller margin of error allows for *less* variability in the sample, requiring more samples to achieve the desired level of precision. Therefore, Focus Initiatives require more sampling than non-Focus Initiatives.

Once the total number of samples was calculated for each initiative, the IE determined how many samples should come from non-HFTD, HFTD Tier 2, and HFTD Tier 3 areas. Due to HFTD-Tier 3 areas posing the most significant threat to wildfire ignition risk, it was determined that 70% of the sampling would occur in these areas, while 20% of sampling would occur in HFTD Tier 2 areas, and the remaining 10% would occur in non-HFTD areas. If a certain initiative did not reside within an HFTD Tier 3 area, then the sampling number would be drawn from a HFTD Tier 2 area; if an initiative did not reside within either a HFTD Tier 3 or 2 area, then all samples were drawn from the non-HFTD area. An additional 25% of samples were identified to be used in the case that any of the primary samples were unusable or inaccessible.

Figure 1: Overview of Field Areas Sampled



4. REVIEW OF INITIATIVES ACROSS WMP CATEGORIES: IMPLEMENTATION AND FUNDING

Table 5: WMP Initiative Category Initiative Summary

WMP Initiative Category	No. of Focus and Field Verifiable Initiatives	No. of Focus and Non-Field Verifiable Initiatives	No. of Non-Focus and Field Verifiable Initiatives	No. of Non-Focus and Non-Field Verifiable Initiatives
Grid Design, Operations, and Maintenance	7	3	6	21
Vegetation Management and Inspections	0	2	1	16
Situation Awareness and Forecasting	0	3	0	6
Emergency Preparedness	0	0	0	5
Community Outreach and Engagement	0	0	0	4

Funding Evaluation Methodology

The IE employed a comprehensive approach to evaluate funding compliance for each initiative in the WMP. The funding methodology approach included the following:

Budget Baseline Establishment: The IE established a baseline for planned expenditures by thoroughly reviewing budget information documented in BVES's approved 2025 WMP filing. These planned budget figures were cross verified against BVES's officially reported data, specifically examining the EOY Report 2025 Table 11 which took precedence if any discrepancies were noted.

Actual Expenditure Verification: Actual financial expenditures reported by BVES in their April 2026 AIR Attachment D for Expense and Capital were compared against established WMP budget baselines.

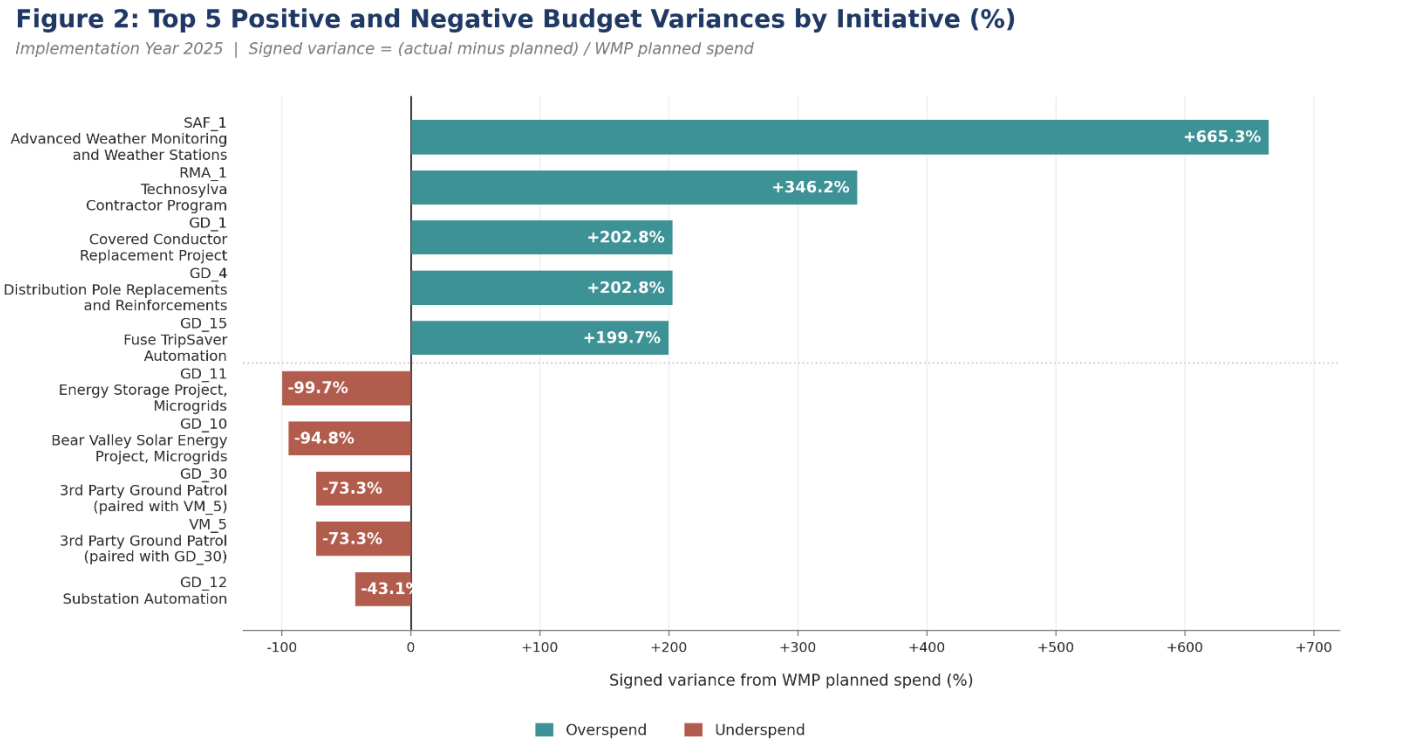
Variance Analysis: The IE calculated the absolute percent differences for each initiative by applying the formula as required by Energy Safety guidelines. These calculations were conducted for every initiative, generating detailed variance data for further review and analysis.

Threshold Application: A predefined threshold of 10% absolute percent difference was applied to systematically identify initiatives that required deeper review.

Supporting Documentation Review: For initiatives exceeding the established 10% variance threshold, the IE requested additional supporting documentation and detailed explanations from BVES. If BVES's rationale provided in the AIR was insufficient or incomplete, the IE explicitly asked for further documentation as necessary to achieve clarity and validate the reasoning behind the variances.

Detailed Analysis and Reporting: The IE documented any funding discrepancies identified during the evaluation, provided accurate corrected values, and analyzed the underlying causes for each variance, as detailed in Section 4 of this report and the top five (5) positive and negative variances as summarized in Figure 2.

Figure 2: Top 5 Positive & Negative Variance by Initiative (%)



Note: Positive values indicate actual spend above WMP planned spend; negative values indicate actual spend below WMP planned spend. Ranking excludes zero-plan prior-year carryover items where 2025 costs were invoiced against a $0 2025 budget (GD_2, GD_5, GD_16, GD_17, GD_21, GD_23, SAF_2). GD_30 and VM_5 are paired 50/50 to a single 3rd Party Ground Patrol engagement and both appear at -73.3%.

4.1 GRID DESIGN, OPERATIONS, AND MAINTENANCE

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.1.1 Initiative Summary Table

Table 6: Initiative Summary Table (Spend in Thousand $)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[2]	Sample Validation Rate (%)[3],[4]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[5],[6],[7]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
GD_1, 8.1.2.1, Covered Conductor Replacement Project	5.10 Circuit Miles	7.73 Circuit Miles (246 Segments per DR015)	Completed	3.1 Circuit Miles (89 Segments)	100%	Field Inspections Pole Locations (Frontload Data, DR015) Sample As-builts (DR015.b, DR015.c)	152%	$1,840.60	$5,572.70 (202.8%)	Yes (3.62%)
GD_2, 8.1.2.1, Radford Line Replacement Project	0 Circuit Miles	Project Completed in 2024	N/A	N/A	N/A	N/A	Not Applicable	$0	$117.10	N/A
GD_3, 8.1.2.2, Minor Undergrounding Upgrades Projects	Initiate Underground Projects as Needed (% of Budget)	BVES is on track to complete this objective as planned.	In Progress	8 Project Locations	100%	Field Inspections Service Locations (Frontload Data)	100%	$301.20	$172.60 (-42.7%)	Yes (4.98%)
GD_4, 8.1.2.3, Distribution Pole Replacements & Reinforcements	100 Poles	123 Poles	Completed	62 Poles	98.8%	Field Inspections Pole Locations (Frontload Data)	122%	$788.8	$2,388.30 (202.8%)	Yes (60%)
GD_5, 8.1.2.3, Radford Line Replacement Project	0 Poles	Project Completed in 2024	N/A	N/A	N/A	N/A	Not Applicable	$0	$50.2	N/A
GD_6, 8.1.2.3, Evacuation Route Hardening Project	500 Poles	851 Poles	Completed	119 Poles	98.7%	Field Inspections Pole Locations (Frontload Data, DR020, DR049.b)	168%	$794.10	$540.40 (-31.9%)	Yes (12%)
GD_8, 8.1.2.5, Traditional Overhead Hardening	As Needed Maintenance Budget (% of Budget)	In Progress	In Progress	11 Maintenance Items	100%	Maintenance Repair Log (Frontload Data) 16 Maintenance Records (DR050)	100%	$803.30	$1,011.50 (25.9%)	Yes (4.36%)

[2] N/A in the "Sample Size" column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
[3] The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
[4] N/A in the "Sample Validation Rate" column indicates that no sampling was reviewed; therefore, no validation rate was applied.
[5] The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.
[6] Energy Safety's Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.
[7] Not Applicable in the "IE Findings on Initiative" column indicates that the IE determined the initiative to not be relevant for review for implementation year 2025. Refer to the initiative review under section 4.1.2.1 for more detail.

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[2]	Sample Validation Rate (%)[3, 4]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[5, 6, 7]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
GD_10, 8.1.2.7, Bear Valley Solar Energy Project, Microgrids	100% Project Completion	Pursuing Conditional Use Permit	Delayed	N/A	N/A	CPUC Approval Decision (Frontload Data)	0%	$13,578.40	$702.20 (-94.8%)	N/A
GD_11, 8.1.2.7, Energy Storage Project, Microgrids	100% Project Completion	This project is being carried over to the 2026-2028 Base WMP.	Delayed	N/A	N/A	CPUC Approval Decision (Frontload Data)	0%	$10,342	$32.5 (-99.7%)	N/A
GD_12, 8.1.2.8, Substation Automation	3 Substations	3 Substations	Completed	3 Substations	100%	Field Inspections Substation Locations (Frontload Data)	100%	$640.20	$364.40 (-43.1%)	Yes (29%)
GD_13, 8.1.2.8, Switch and Field Device Automation	11 Switches	11 Switches	Completed	11 Switches	100%	Field Inspections Switch Locations (Frontload Data)	100%	$640.20	$1,370.60 (114.1%)	Yes (22%)
GD_14, 8.1.2.8, Capacitor Bank Upgrade Project	6 Capacitor Banks	6 Capacitor Banks	Completed	6 Capacitor Banks	100%	Field Inspections Capacitor Bank Locations (Frontload Data) Installation Location Clarification (DR021)	100%	$311.50	$594.10 (90.7%)	Yes (29%)
GD_15, 8.1.2.8, Fuse TripSaver Automation	50 Fuse TripSavers	73 Fuse TripSavers[8]	Completed	46 Fuse TripSavers	100%	Field Inspections Fuse Tripsaver Locations (Frontload Data) Installation Location Clarification (DR049)	98%	$133.60	$400.40 (199.7%)	Yes (29%)
GD_16, 8.1.2.8, Server Room	100% Project Completion	Completed	Completed	N/A	100%	Field Inspections Server Room Location (Frontload Data)	100%	$0	$42.60	N/A
GD_17, 8.1.2.8, Distribution Management Center	100% Project Completion	Completed	Completed	N/A	N/A	N/A	Not Applicable	$0	$11.90	N/A
GD_19, 8.1.2.10, Tree Attachment Removal Project	100 Tree Attachments	110 Tree Attachments	Completed	62 Tree Attachments	98.6%	Field Inspections Project Completion Documentation (Frontload Data)	108%	$592.70	$861.90 (45.4%)	Yes (10%)
GD_21, 8.1.2.12, BVPP Phase 4 Upgrade Project	100% Project Completion	Completed	Completed	N/A	N/A	BVES Written Response (Frontload Data)	100%	$0	$79.50	N/A

[8] The 2025 EC AIR reported 73 TripSavers, which includes 23 units installed under the 2024 program and finalized in early 2025. In response to DR049, BVES confirmed 49 units installed in 2025. The table retains 73 as the claimed progress reported in the 2025 EC AIR, with the Initiative Validation Rate calculated on the 49 units attributable to 2025, yielding 98 percent (49 * 1 / 50). See Section 4.1.2.1, Initiative Review for GD_15.

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[2]	Sample Validation Rate (%)[3, 4]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[5, 6, 7]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
GD_22, 8.1.2.12, Partial Safety and Technical Upgrades to Maltby Substation	100% Project Completion	The electrical equipment was installed October 31, 2025, and the substation was reenergized November 14, 2025.	Completed	N/A	N/A	Maltby Substation Timeline BVES Written Response Substation Photos (Frontload Data)	100%	$1,777.50	$1,896.60 (6.7%)	N/A
GD_23, 8.1.2.12, Safety and Technical Upgrades to Lake Substation	No Action	In Progress	In Progress	N/A	N/A	Lake Substation Timeline (Frontload Data)	Not Applicable	$0	$1,374.52 (100%)	N/A
GD_24, 8.1.2.12, Partial Safety and Technical Upgrades to Village Substation	No Action	In Progress	Delayed	N/A	N/A	BVES Written Response (Frontload Data)	Not Applicable	$0	$0	N/A
GD_25, 8.1.3.1, Detailed Inspection Program	53 Circuit Miles	53 Circuit Miles	Completed	34 Asset Points[9]	100%	Inspection Log 34 Inspection Records (Frontload Data) Circuit Mileage by Circuit (DR002)	92%[10]	$14.30	$31.30 (118.9%)	No (4.36%)
GD_26, 8.1.3.2, Patrol Inspection Program	205 Circuit Miles	205 Circuit Miles	Completed	14 Asset Points[9]	100%	Patrol Inspection List (Frontload Data) 14 Inspection Records (DR031) Circuit Mileage by Circuit (DR002)	96%[11]	$33.40	$73 (118.6%)	Yes (4.36%)
GD_27, 8.1.3.3, UAV Thermography	205 Circuit Miles	205 Circuit Miles	Completed	34 Asset Points[9]	100%	UAV and Thermal Inspection List 34 Inspection Records (Frontload Data) Circuit Mileage by Circuit (DR002)	100%	$74.10	$61.30 (-17.3%)	Yes (4.36%)
GD_28, 8.1.3.4, UAV/HD Photography/ Videography	205 Circuit Miles	205 Circuit Miles	Completed	34 Asset Points[9]	100%	UAV and Thermal Inspection List 34 Inspection Records (Frontload Data) Circuit Mileage by Circuit (DR002)	100%	$74.10	$59.50 (-19.7%)	Yes (4.36%)

[9] The sampling Population is based on the total number of asset points provided by BVES rather than the target unit circuit mileage.
[10] Although all sampling data was validated, the data provided by BVES indicates a shortfall of four circuit miles resulting in a 92% initiative validation rate. (49 * 1 / 53 = .9245 * 100 = 92.45%) See Section 4.1.2.1, Initiative Review for GD_25.
[11] Although all sampling data was validated, the IE was only able to validate circuit miles for circuits included in the BVES provided data and, as the Baldwin circuit was not included, the IE could not verify inspections of this circuit. Therefore, only 197 circuit miles were validated, resulting in a 96% initiative validation rate. (197 * 1 / 205 = .9609 * 100 = 96.09%) See Section 4.1.2.1, Initiative Review for GD_26.

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[2]	Sample Validation Rate (%)[3, 4]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[5, 6, 7]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
GD_29, 8.1.3.1, LiDAR Inspection	205 Circuit Miles	205 Circuit Miles	Completed	30 Asset Points[9]	100%	LiDAR Inspection List 30 Inspection Records (Frontload Data) Circuit Mileage by Circuit (DR002)	91%[12]	$85.40	$76.20 (-10.8%)	No (4.36%)
GD_30, 8.1.3.6, 3rd Party Ground Patrol	205 Circuit Miles	205 Circuit Miles	Completed	34 Asset Points[9]	100%	3rrd Party Inspection List 34 Inspection Records (Frontload Data) Circuit Mileage by Circuit (DR002)	100%	$61.50	$16.40 (-73.3%)	Yes (4.36%)
GD_31, 8.1.3.7, Intrusive Pole Inspections	850 Poles	850 Poles	Completed	33 Poles	100%	Intrusive Inspection List 33 Inspection Records (Frontload Data)	108%[13]	$19.70	$38.40 (94.9%)	Yes (4.36%)
GD_32, 8.1.3.8, Substation Inspections	144 Substations	156 Substations	Completed	28 Substations	96%	Substation Inspection List (Frontload Data) 27 Inspection Records (DR037)	95%[14]	$291.70	$335.20 (14.9%)	Yes (4.36%)
GD_33, 8.1.4.3, Equipment Maintenance & Repair	As Needed Maintenance (% of Budget)	In Progress	In Progress	N/A	N/A	Maintenance Repair Log (Frontload Data) 11 Maintenance Items	100%	$1,105.40	$1,352.20 (22.3%)	Yes (4.36%)
GD_34, 8.1.5, Asset Management & Inspection Enterprise System(s)	100% Maintenance of Asset Management System	This objective was completed in 2023. In 2023, BVES implemented the iRestore system of asset management.	In Progress	N/A	N/A	3 Fully Executed iRestore Contracts (Frontload Data)	100%	$59.40	$46 (-22.6%)	Yes (4.36%)
GD_35, 8.1.6, Asset Quality Assurance/Quality Control	20 Asset QCs on WMP Work	20 Asset QCs	Completed	13 Asset QCs	100%	QC Assessment Log (Frontload Data) 13 Asset QC Records (DR041)	100%	$20.90	$27.60 (32.1%)	Yes (4.36%)
GD_36, 8.1.7, Open Work Orders	All WO resolved within GO95 Timeframe	In Progress	In Progress	N/A	N/A	GO165 Procedure (Frontload Data)	0%	$18.30	$24.20 (32.2%)	N/A

[12] Although all sampling data was validated, the data provided by BVES indicates a shortfall of 18 circuit miles resulting in a 91% initiative validation rate. (187 * 1 / 205 = .9121 * 100 = 91.21%) See Section 4.1.2.1, Initiative Review for GD_29.
[13] BVES claimed 850 pole inspections in the 2025 EC AIR, however, the data provided indicates that 915 unique pole inspections occurred in 2025, resulting in an 108% initiative validation rate. (915 * 1 / 850 = 1.076 * 100 = 107.6%) See Section 4.1.2.1, Initiative Review for GD_31.
[14] Data provided by BVES indicates that monthly inspections occurred at 12 substations, with only the February inspection at the Village substation not being performed, resulting in a total of 143 substation inspections for 2025. The IE was also unable to validate all the sampling data provided resulting in a 96% sample validation rate. Therefore, the initiative validation rate is 95%. (143 * .96 / 144 = .9533 * 100 = 95.33%) See Section 4.1.2.1, Initiative Review for GD_32.

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[2]	Sample Validation Rate (%)[3, 4]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[5, 6, 7]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
GD_37, 8.1.8.1, Equipment Settings to Reduce Wildfire Risk	Review & Evaluate System Settings	In Progress	In Progress	N/A	N/A	BVES ERDP Rev. 2 BVES PSPS Procedures Rev. 3 EPSS Implementation List (Frontload Data)	100%	$5.20	$6.90 (32.7%)	Yes (4.36%)
GD_38, 8.1.8.2, Grid Response Procedures & Notifications	Finalize Review	In Progress	In Progress	N/A	N/A	BVES ERDP Rev. 2 Firefighting Coordination Protocols (Frontload Data)	100%	$9.20	$12.10 (31.5%)	No (84%)
GD_39, 8.1.8.3, Personnel Work Procedures & Training in Conditions of Elevated Fire Risk	Finalize Review	In Progress	In Progress	N/A	N/A	BVES PSPS Procedures Rev. 3 PSPS Exercise Spreadsheet BVES PSPS Post-Season Report (Frontload Data)	100%	$3.90	$5.20 (33.3%)	Yes (3.62%)
GD_40, 8.1.9, Workforce Planning	Staffing Level Verified	In Progress	In Progress	N/A	N/A	Fully Executed & Amended Contracts (Frontload Data)	100%	$6.50	$8.60 (32.3%)	Yes (3.62%)
ST_1, 5.4.5, Environmental Compliance & Permitting	Annual Review and Update	In Progress	In Progress	N/A	N/A	Snow Summit Permit (Frontload Data)	100%	$26.20	$34.50 (31.7%)	No Goal Provided

4.1.2 Written Detail for Initiatives

4.1.2.1 Initiative Review – Findings & Method

GD_1 – 8.1.2.1 – Covered Conductor Replacement Project – Focus & Field Verifiable

Covered conductor replacement is intended to reduce wildfire ignition risk by replacing bare overhead conductors with insulated covered conductors, reducing the likelihood that contact from vegetation or other foreign objects on BVES's overhead distribution system results in faults and ignitions in high fire-risk areas. As described in BVES's 2023-2025 WMP, Section 8.1.2.1, BVES uses covered conductor replacement as a grid hardening activity supporting wildfire mitigation. BVES's 2025 target for this initiative was 5.10 circuit miles of covered conductor installation, with a 3.62 percent risk-reduction goal identified in the 2025 WMP.

BVES reported completion of 7.73 circuit miles of covered conductor in 2025, exceeding the 5.10-circuit-mile target. BVES's 2025 AIR, dated April 1, 2026, and 2025 Q4 QDR, dated February 1, 2026, both reported this result as 7.73 circuit miles. In response to Data Request DR015, BVES indicated that as-built drawings exist only in paper form and that scanning the full set associated with 7.73 circuit miles would require substantial effort; BVES proposed providing as-builts for a sample of the work and identified that the 7.73 circuit miles were comprised of 246 individual segments. Per discussions between Energy Safety and the IE on April 21, 2026, Energy Safety approved a sampling approach to the 246-segment population. In its frontloaded data response and DR015.b, BVES provided consolidated GIS data, segment-level project records, and spatial coordinates for field navigation.

Because the reported population exceeded fifteen units, the IE determined the sample size using the Energy Safety sampling calculator applied to the 246-segment population, randomly selecting 111 segments for field verification.

The IE conducted field observations across the 111 sampled segments using ground patrols, capturing geo-referenced photographs and 360-degree video coverage where roadway access permitted. For each sample location, the IE confirmed that covered conductor was installed on the documented portions of the circuits, that conductor length and location matched the records provided in DR015.b, and that hardware (including dead-ends, suspension clamps, and splices) was appropriate for covered conductor.

The sampled segments met the initiative criteria, yielding a Sample Validation Rate of 100 percent. Applying the Initiative Validation Rate formula, the Sample Validation Rate multiplied by BVES-reported completion divided by the WMP target, the Initiative Validation Rate is 152 percent, calculated as 100 percent × 7.73 / 5.10. The result exceeds the 95 percent validation threshold. The initiative is Validated.

In its review of DR015.b and DR015.c, the IE observed that the as-built drawings provided for the Baldwin 34kV circuit carried a title block date of 08/14/2024 and the Boulder 4kV circuit carried a title block date of 10/12/2018, and neither set reflected redlined markups dated within calendar year 2025. Per BVES's DR015.c response, BVES noted the following:

- The Baldwin 34kV pole replacements require permits that BVES is awaiting, and to meet WMP targets and harden the entire 34kV system BVES replaced conductor in 2025 without replacing the poles, with updated as-builts pending pole replacement.
- For the Boulder 4kV circuit (Mill Creek Road area), poles were replaced in 2018 and, because the road is in a high-risk remote forested area, BVES added covered conductor in 2025 to reduce ignition risk, with no additional as-builts generated for the conductor-only work.

The IE treats the as-built dating as a documentation timing matter that does not affect the field-verified completion of the installed work. The IE also reviewed the sampled segments for workmanship, location accuracy, and correspondence between completed work and BVES's reported 2025 scope. The field review identified no workmanship exceptions for the sampled segments.

For illustrative examples, see Figure 3: Example Covered Conductor Replacement Project Field Images.

Figure 3:
Example Covered Conductor Replacement Project Field Images

Structure #	Circuit Number
1026BV	Baldwin 34kV

Structure #	Circuit Number
15542BV	Baldwin 34kV

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative

Table 7: Covered Conductor Replacement Project

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR015 Response	Initiative Validation Rate
5.10 Circuit Miles	7.73 Circuit Miles	7.73 Circuit Miles	7.72 Circuit Miles (246 Segments)	152%

GD_2 – 8.1.2.1 – Radford Line Replacement Project – Focus & Field Verifiable

The Radford Line Replacement Project addresses wildfire ignition risk along the 34.5 kV Radford sub-transmission line by replacing bare wire with high-performance covered conductor through a section of HFTD Tier 3 under U.S. Forest Service jurisdiction. As described in BVES's 2023-2025 WMP, Section 8.1.2.1, BVES's 2025 target for this initiative was 0 circuit miles, reflecting that the project was scheduled for completion prior to the 2025 reporting period. The WMP did not include an active 2025 risk-reduction target for this initiative.

Per BVES's 2025 AIR, dated April 1, 2026, the Radford Line Replacement Project was completed in November 2024, and no covered conductor installation work was performed on the Radford Line during 2025. The 2025 AIR reports 0 circuit miles for 2025 and classifies the initiative as not applicable for the 2025 reporting period. In response to the frontloaded data request, BVES confirmed that no covered conductor installation work was performed on the Radford Line during 2025.

Because no 2025 target activity or completed 2025 work was identified, no field-verification population existed for Implementation Year 2025, and the IE did not perform field sampling for GD_2. Based on the documentation reviewed, the IE determined this initiative Not Applicable for the 2025 review period. BVES met its 2025 WMP target of 0 circuit miles.

Table 8: Radford Line Replacement Project

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
N/A	N/A	N/A	N/A	N/A

GD_3 – 8.1.2.2 – Minor Undergrounding Upgrades Projects – Non-Focus & Field Verifiable

Minor undergrounding upgrades are intended to reduce wildfire ignition risk by relocating selected overhead facilities to underground configurations in response to customer requests, local

government coordination, and facility-driven needs. As described in BVES's 2023-2025 WMP, Section 8.1.2.2, BVES does not have any large-scale undergrounding projects planned within the 2023-2025 WMP cycle and instead carries out minor undergrounding upgrades on an as-needed basis. BVES's 2025 target for this initiative was to initiate underground projects as needed, measured as 100 percent of allocated budget, with a 4.98 percent risk-reduction goal identified in the 2025 WMP.

Per BVES's 2025 Q4 QDR, provided in response to the frontloaded data request, BVES reported the initiative status as In Progress, with year-to-year variations typical given the customer-driven and local-government-driven nature of minor undergrounding work. In response to the frontloaded data request, BVES provided GIS data for eight (8) minor undergrounding project locations initiated during 2025, including project location and address, work order number, circuit identifier, GPS coordinates, and completion date.

Because the reported field population consisted of eight (8) project locations, the IE reviewed the full population rather than applying Cochran-based statistical sampling, consistent with the engagement sampling methodology for populations of fifteen or fewer units. No calibration or alternate sample allotment was required.

The IE conducted field observations at all eight (8) reported minor undergrounding project locations, navigating to each site using the GPS coordinates provided in the BVES GIS data and capturing geo-referenced photographs at each location. For each project location, the IE confirmed that overhead-to-underground conversion work was completed, that the reported circuit and address corresponded to the field-observed location, and that the in-field configuration was consistent with the GIS data provided.

The reviewed locations met the initiative criteria, yielding a Sample Validation Rate of 100 percent. Because the WMP target for this initiative is an as-needed, budget-based commitment rather than a unit-count target, the Initiative Validation Rate is reported as 100 percent based on verification of the eight (8) reported project locations against the budget-based verification method.

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 9: Minor Undergrounding Upgrades Projects

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Initiate UG Projects as Needed (100% of Budget)	In Progress	In Progress	8 Project Locations	100%

GD_4 – 8.1.2.3 – Distribution Pole Replacements & Reinforcements – Focus & Field Verifiable

Distribution pole replacements and reinforcements supporting the covered conductor program are intended to reduce wildfire ignition risk by replacing or reinforcing distribution poles that support overhead lines in the HFTD, addressing the failure modes of pole degradation, structural loading from covered conductor installation, and contact-driven ignitions caused by pole failure. As described in BVES's 2023-2025 WMP, Section 8.1.2.3, this initiative operates in coordination with the broader Covered Conductor Replacement Project (GD_1), as pole assessments and remediations are a prerequisite for safely supporting covered conductor on the distribution system. BVES's 2025 target for this initiative was 100 distribution pole replacements in the HFTD, with a 60 percent risk-reduction goal identified in the 2025 WMP.

BVES reported completion of 123 pole replacements in 2025, exceeding the 100-pole target. BVES's 2025 AIR, dated April 1, 2026, and 2025 Q4 QDR both reported 123 poles replaced and classified the initiative as Achieved. In its frontloaded data response, BVES provided consolidated GIS data and completion records covering all reported pole replacements (125 in the frontload records, 123 in the AIR and Q4 QDR), including original and new structure identifiers, circuit identifier, GPS coordinates, address, installation date, and work type.

Because the reported population exceeded fifteen units, the IE determined the sample size using Cochran's formula with finite population correction. The IE conducted field observations at 81 of the 123 reported pole replacement locations, capturing geo-referenced photographs at each site and confirming structure identification, pole replacement consistent with design, and workmanship consistent with industry standards.

Eighty (80) of the eighty-one (81) sampled locations met the initiative criteria, yielding a Sample Validation Rate of 98.8 percent. At the remaining sampled location, the GPS coordinates matched the GIS record but the pole at the site had not been replaced; the in-field structure carried a different pole tag than the Structure ID reported by BVES and showed no indication of having been replaced as part of the 2025 program. The IE treats this finding as a workmanship and data-accuracy item against the sample. Applying the Initiative Validation Rate formula, the Sample Validation Rate multiplied by BVES-reported completion divided by the WMP target, the Initiative Validation Rate is 122 percent, calculated as 98.8 percent × 123 / 100. The result exceeds the 95 percent validation threshold. The initiative is Validated.

For illustrative examples, please refer to Figure 4: Example Covered Conductor Distribution Pole Replacements & Reinforcements Field Images.

Figure 4:
Example Distribution Pole Replacements & Reinforcements Field Images

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 10: Distribution Pole Replacements & Reinforcements

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
100 Poles	123 Poles	123 Poles	125 Poles	122%

GD_5 – 8.1.2.3 – Radford Line Replacement Project (Poles) – Non-Focus & Field Verifiable

The pole-replacement scope of the Radford Line Replacement Project addresses wildfire ignition risk associated with sub-transmission structures along the 34.5 kV Radford line, in coordination with the conductor scope tracked under GD_2. As described in BVES's 2023-2025 WMP, Section 8.1.2.3, BVES's 2025 target for this initiative was 0 pole replacements, reflecting that the project was scheduled for completion prior to the 2025 reporting period. The WMP did not include an active 2025 risk-reduction target for this initiative.

Per BVES's 2025 AIR, dated April 1, 2026, the Radford Line Replacement Project was completed in November 2024, and no pole replacement work was performed on the Radford Line during 2025. In response to the frontloaded data request, BVES confirmed that no pole replacement work was performed on the Radford Line during 2025.

Because no 2025 target activity or completed 2025 work was identified, no field-verification population existed for Implementation Year 2025, and the IE did not perform field sampling for GD_5. Based on the documentation reviewed, the IE determined this initiative Not Applicable for the 2025 review period. BVES met its 2025 WMP target of 0 pole replacements.

Table 11: Radford Line Replacement Project (Poles)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
NA	NA	NA	NA	NA

GD_6 – 8.1.2.3 – Evacuation Route Hardening Project – Focus & Field Verifiable

The Evacuation Route Hardening Project is intended to reduce wildfire ignition risk and protect critical evacuation corridors by installing wire wrap mesh on wood distribution poles located along secondary roads that lead to primary evacuation routes within the HFTD. The wire wrap mesh hardens existing poles against burn-through and structural failure during wildfire events, addressing the failure mode of pole loss along evacuation corridors that would impede public evacuation and first responder access. As described in BVES's 2023-2025 WMP, Section 8.1.2.3, BVES's 2025 target for this initiative was to install wire wrap mesh on 500 wood poles in the HFTD, with a 12 percent risk-reduction goal identified in the 2025 WMP.

BVES reported completion of 851 wood-pole wire-wrap-mesh installations in 2025, exceeding the 500-pole target. BVES's 2025 AIR, dated April 1, 2026, and 2025 Q4 QDR both reported 851 poles hardened and classified the initiative as Achieved. In its frontloaded data response and in response to Data Requests DR020 and DR049.b, BVES provided consolidated GIS data, project as-builts, and completion records identifying the reported installations, including structure identifier, circuit identifier, GPS coordinates, address, and installation date.

Because the reported population exceeded fifteen units, the IE determined the sample size using Cochran's formula with finite population correction. The IE conducted field observations at 149 of the 851 reported pole locations, capturing geo-referenced photographs at each site and confirming structure identification, wire wrap mesh installation consistent with design, and workmanship consistent with industry standards.

Of the 149 sampled locations, the IE identified three (3) field findings. At one (1) location, wire wrap mesh was installed but showed observable damage to the mesh material, indicating either installation damage or post-installation deterioration. At one (1) location, the pole had been replaced with a new wood pole but did not have wire wrap mesh installed at the time of field verification. At one (1) location identified in the GIS data, the field asset was a tree rather than a

wood distribution pole, with no wire wrap mesh and no pole replacement observed. Treating the two locations without mesh installation as validation failures and the damaged-mesh location as a workmanship observation, the Sample Validation Rate is 98.7 percent. Applying the Initiative Validation Rate formula, the Sample Validation Rate multiplied by BVES-reported completion divided by the WMP target, the Initiative Validation Rate is 168 percent, calculated as 98.7 percent × 851 / 500. The result exceeds the 95 percent validation threshold. The initiative is Validated.

The IE also reviewed the sampled locations for workmanship, location accuracy, and correspondence between completed work and BVES's reported 2025 scope. The three findings above are noted as workmanship and data-accuracy items; the field review identified no additional exceptions across the remaining sampled locations.

For illustrative examples, please refer to Figure 5: Example Evacuation Route Hardening Project Field Images.

Figure 5:
Example Evacuation Route Hardening Project Field Images

14374BV Goldmine

14571BV Boulder

15708BV Holcomb

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative

Table 12: Evacuation Route Hardening Project (Pole Replacements)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR020 / DR049.b Response	Initiative Validation Rate
500 Poles	851 Poles	851 Poles	851 Poles	168%

GD_8 – 8.1.2.5 Traditional Overhead Hardening – Non-Focus and Non-Field Verifiable

BVES performs "as-needed" maintenance on overhead distribution assets, replacing or repairing poles that are leaning, structurally deficient, or damaged, to keep the system in safe, operating condition and reduce wildfire-ignition risk. Depending on the nature and extent of the noncompliance with GO 95 safety factors, the remediation will require repair or complete replacement of the pole, including removal and reinstallation of all attachments.

As described within the 2023-2025 WMP, BVES identified a 4.36% risk reduction goal, but no 2025 completion target was set beyond the commitment to address maintenance issues as they are identified. Data provided as part of the frontload request consisted of a spreadsheet with 16 records regarding maintenance repair. Information including, but not limited to, pole number, address, circuit, pole type, material, and priority was part of each record.

The IE requested documentation for all repairs listed in the frontload data. BVES responded by providing 16 work orders as PDF files. Work orders included information such as address, date, and circuit, and were signed and stamped by field inspectors. Of the repairs, six (6) were intrusive pole changes, eight (8) were intrusive inspections, and the remaining two (2) were intrusive pole replacements. One of the intrusive pole replacements had mismatched information between the frontload spreadsheet and the work order, namely the Pole Number and Address. All other work orders aligned with frontload data.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 13: Traditional Overhead Hardening

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data and DR050 Response	Initiative Validation Rate
As Needed Maintenance (100% of Budget)	N/A	In Progress	16 Maintenance Items	100%

GD_10 – 8.1.2.7 Bear Valley Solar Energy Project, Microgrids – Focus and Non-Field Verifiable

In support of Initiative GD_10, BVES was asked to provide documentation showing progress toward the stated 2025 goal of 100% project completion for this initiative. The utility responded by submitting a 50-page document entitled "*Decision Approving Settlement Agreement for Bear Valley Electrical Service's Application to Develop a Solar Facility and Battery Energy Storage System*" with an issuance date from CPUC of December 22, 2025 (approval date of December 18, 2025). This document outlines approval for BVES to own and operate a 5 megawatt (MW) alternating current/6.1 MW direct current photovoltaic solar generation facility and a 5 MW/20 MW-hour battery storage system. The solar generation facility will be constructed on approximately 21 acres located at 2151 Erwin Ranch Rd, Big Bear, CA. The solar project will be interconnected to BVES's existing system with construction of 1.8 miles of new 34.5 kilovolt electrical lines. The battery storage system will be located within the boundaries of BVES's existing Meadow Substation at 42020 Garstin Dr, Big Bear Lake, CA.

Although formal approval for this project application was obtained from the California Public Utilities Commission (CPUC), a review of the QDR4 submitted by BVES indicates that the project is currently in a delayed status, with completion now projected for 2027. This revised timeline has been formally incorporated into BVES's 2026–2028 Wildfire Mitigation Plan (WMP), reflecting a significant shift from the originally planned schedule. While the submitted documentation sufficiently demonstrates that CPUC approval was granted, the audit identified a discrepancy between the approved project and its actual implementation progress. Specifically, the original 2025 objective of achieving 100% project completion has not been met. As a result, despite regulatory approval being in place, the initiative has not fulfilled its intended performance targets within the required timeframe.

Based on this analysis and the documentation provided, the IE has not validated this initiative.

Table 14: Bear Valley Solar Energy Project, Microgrids

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
100% Project Completion	Delayed	Pursuing Conditional Use Permit	Decision Approving Settlement Agreement	0%

GD_11 – 8.1.2.7 Energy Storage Project, Microgrids – Focus and Non-Field Verifiable

In support of Initiative GD_11, BVES was asked to provide documentation showing progress toward the stated 2025 goal of 100% project completion for this initiative. The utility responded by submitting a 50-page document entitled "*Decision Approving Settlement Agreement for Bear Valley Electrical Service's Application to Develop a Solar Facility and Battery Energy Storage System*" with an issuance date from CPUC of December 22, 2025 (approval date of December 18,

2025). This document outlines approval for BVES to own and operate a 5 megawatt (MW) alternating current/6.1 MW direct current photovoltaic solar generation facility and a 5 MW/20 MW-hour battery storage system. The solar generation facility will be constructed on approximately 21 acres located at 2151 Erwin Ranch Rd, Big Bear, CA. The solar project will be interconnected to BVES's existing system with construction of 1.8 miles of new 34.5 kilovolt electrical lines. The battery storage system will be located within the boundaries of BVES's existing Meadow Substation at 42020 Garstin Dr, Big Bear Lake, CA.

Although formal approval for this project application was obtained from the California Public Utilities Commission (CPUC), a review of the QDR4 submitted by BVES indicates that the project is currently in a delayed status, with completion now projected for 2027. This revised timeline has been formally incorporated into BVES's 2026–2028 Wildfire Mitigation Plan (WMP), reflecting a significant shift from the originally planned schedule. While the submitted documentation sufficiently demonstrates that CPUC approval was granted, the audit identified a discrepancy between the approved project and its actual implementation progress. Specifically, the original 2025 objective of achieving 100% project completion has not been met. As a result, despite regulatory approval being in place, the initiative has not fulfilled its intended performance targets within the required timeframe.

Based on this analysis and the documentation provided, the IE has not validated this initiative.

Table 15: Energy Storage Project, Microgrids

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
100% Project Completion	Delayed	This project is being carried over to the 2026-2028 Base WMP	Decision Approving Settlement Agreement	0%

GD_12 – 8.1.2.8 – Substation Automation (SCADA Integration) – Non-Focus & Field Verifiable

Substation automation is intended to reduce wildfire and PSPS-related risk by connecting BVES substations to the SCADA network, enabling remote real-time monitoring, control, and parameter adjustment of substation equipment. Automation supports faster fault detection and isolation, narrows the duration and geographic scope of PSPS events through more granular control, and allows operations to modify equipment settings remotely without dispatching field crews into elevated fire-risk conditions. As described in BVES's 2023-2025 WMP, Section 8.1.2.8, BVES uses substation automation as a grid hardening activity supporting wildfire mitigation. BVES's 2025 target for this initiative was to automate and connect three (3) substations to SCADA, with a 29 percent risk-reduction goal identified in the 2025 WMP.

BVES reported automation of three (3) substations in 2025, meeting the three-substation target. BVES's 2025 AIR, dated April 1, 2026, and 2025 Q4 QDR both reported three (3) substations

automated and classified the initiative as Achieved. In its frontloaded data response, BVES identified the three substations as Fawnskin, Summit, and Maltby and provided substation name, GPS coordinates, and commissioning status for each. BVES also explained that, given the utility's size, individual substations are verified during commissioning through coordination between field personnel and the Distribution Management Center (DMC), confirming that the DMC receives field data from the automated substation and can command devices remotely.

Because the reported field population consisted of three (3) substations, the IE reviewed the full population rather than applying Cochran-based statistical sampling, consistent with the engagement sampling methodology for populations of fifteen or fewer units. No calibration or alternate sample allotment was required.

The IE conducted field observations at all three (3) reported substation automation locations on May 7, 2026, escorted by a BVES substation technician, capturing photographs of the installed automation equipment and confirming that automation equipment installations were completed at Fawnskin, Summit, and Maltby substations and that each substation was connected to BVES's SCADA network consistent with BVES's described DMC commissioning verification process.

All three (3) substations met the initiative criteria, yielding a Sample Validation Rate of 100 percent. Applying the Initiative Validation Rate formula, the Sample Validation Rate multiplied by BVES-reported completion divided by the WMP target, the Initiative Validation Rate is 100 percent, calculated as 100 percent × 3 / 3. The result exceeds the 95 percent validation threshold. The initiative is Validated.

The IE also reviewed the sampled substations for workmanship, equipment installation, and SCADA connectivity. Based on the field observations and the BVES DMC verification process described, the IE did not identify visible workmanship or commissioning exceptions.

For illustrative examples, see Figure 6: Example Substation Automation Field Images.

Figure 6:
Example Substation Automation (SCADA Integration) Field Images

Maltby Substation

Snowsummit Substation

Fawnskin Substation

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative

Table 16: Substation Automation (SCADA Integration)

2025 Target	2025 AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
3 Substations	3 Substations	3 Substations	3 Substations	100%

GD_13 – 8.1.2.8 – Switch & Field Device Automation – Focus & Field Verifiable

Switch and field device automation is intended to reduce wildfire and PSPS-related risk by automating sub-transmission and distribution switches and connecting them to BVES's SCADA network, enabling remote real-time monitoring, reporting, and operation of field switches. Automation supports faster fault detection, isolation, and service restoration, narrows the geographic scope and customer impact of PSPS events, and allows operations to modify switch settings remotely without dispatching field crews into elevated fire-risk areas. As described in BVES's 2023-2025 WMP, Section 8.1.2.8, BVES uses switch automation as a grid hardening activity supporting wildfire mitigation. BVES's 2025 target for this initiative was to automate and connect eleven (11) field switches to SCADA, with a 22 percent risk-reduction goal identified in the 2025 WMP.

BVES reported automation of eleven (11) field switches in 2025, meeting the eleven-switch target. BVES's 2025 AIR, dated April 1, 2026, and 2025 Q4 QDR both reported eleven (11) switches

automated and classified the initiative as Achieved. In its frontloaded data response, BVES provided location data and commissioning status for twelve (12) switches, including switch identifier, structure identifier, circuit identifier, GPS coordinates, voltage, and commissioning status.

Because the reported field population consisted of eleven (11) reported devices, the IE reviewed the full population rather than applying Cochran-based statistical sampling, consistent with the engagement sampling methodology for populations of fifteen or fewer units. No calibration or alternate sample allotment was required.

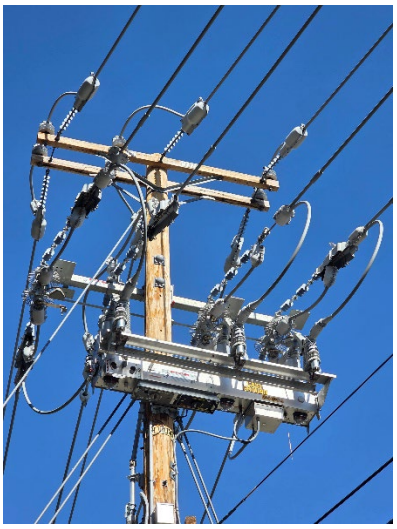
The IE conducted field observations at all eleven (11) reported switch automation locations, capturing geo-referenced photographs and verifying installation workmanship against industry standards. Nine (9) of the eleven (11) reported locations were directly field-verified as complying with the initiative. At one (1) location, the IE found a pole at the reported GPS coordinates but the in-field pole tag did not match the Structure ID reported by BVES, and no switch was installed on the pole. At one (1) additional location, the pole could not be identified at the reported GPS coordinates after checking surrounding poles. The IE notes these two items as data-location and data-accuracy discrepancies rather than workmanship findings.

Treating the nine (9) directly field-verified devices and the two (2) devices verified through SCADA-connection records as meeting the initiative criteria, the Sample Validation Rate is 100 percent across the eleven-device population. Applying the Initiative Validation Rate formula, the Sample Validation Rate multiplied by BVES-reported completion divided by the WMP target, the Initiative Validation Rate is 100 percent, calculated as 100 percent × 11 / 11. The result exceeds the 95 percent validation threshold. The initiative is Validated.

The IE also reviewed the field-verified devices for workmanship and installation accuracy. The IE identified no workmanship exceptions across the sampled locations; the two data-location discrepancies are carried as asset-tag and coordinate reconciliation items for BVES.

For illustrative examples, see Figure 7: Example Switch and Field Device Automation Field Images.

Figure 7:
Example Switch & Field Device Automation Field Images



12629BV Pioneer - ARI302

15095BV Erwin - RCS1127

11079BV Sunset - RCS1222

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative

Table 17: Switch & Field Device Automation

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
11 Devices	11 Devices	11 Devices	12 Devices	100%

GD_14 – 8.1.2.8 – Capacitor Bank Upgrade Project – Non-Focus & Field Verifiable

The Capacitor Bank Upgrade Project is intended to reduce wildfire and PSPS-related risk by replacing aging capacitor banks and connecting them to BVES's SCADA network, enabling remote monitoring and control of power quality and volt-ampere reactive (VAR) performance across the distribution system. SCADA-connected capacitor banks support faster fault response, improve grid stability during PSPS de-energization and restoration, and allow operations to adjust settings remotely without dispatching field crews into elevated fire-risk areas. As described in BVES's 2023-2025 WMP, Section 8.1.2.8, BVES uses capacitor bank replacement and SCADA integration as a grid hardening activity supporting wildfire mitigation. BVES's 2025 target for this initiative was to replace and connect six (6) capacitor banks to SCADA, with a 29 percent risk-reduction goal identified in the 2025 WMP.

BVES reported replacement and SCADA connection of six (6) capacitor banks in 2025, meeting the six-capacitor-bank target. BVES's 2025 Q4 QDR reported six (6) capacitor banks completed

for 2025. BVES's 2025 AIR, dated April 1, 2026, reported eight (8) capacitor banks and classified the initiative as Achieved. In response to Data Request DR021, BVES clarified that the discrepancy between the QDR and AIR reflects two (2) capacitor banks scheduled for installation in 2024 that were subject to a connection issue resolved in early 2025, at which point those two banks were finalized to complete the 2024 target; the remaining six (6) banks represent the 2025 target completions. In its frontloaded data response, BVES provided capacitor identifier, structure identifier, circuit identifier, voltage, GPS coordinates, and commissioning status for each of the six (6) 2025 capacitor banks.

Because the reported field population consisted of six (6) capacitor banks, the IE reviewed the full population rather than applying Cochran-based statistical sampling, consistent with the engagement sampling methodology for populations of fifteen or fewer units. No calibration or alternate sample allotment was required.

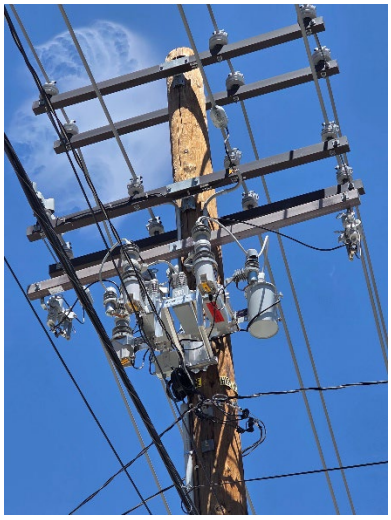
The IE conducted field observations at all six (6) of the 2025 capacitor bank locations, capturing geo-referenced photographs and confirming that capacitor bank replacements were completed and that bank locations aligned with the reported GPS coordinates.

All six (6) capacitor banks met the initiative criteria, yielding a Sample Validation Rate of 100 percent. Applying the Initiative Validation Rate formula, the Sample Validation Rate multiplied by BVES-reported completion divided by the WMP target, the Initiative Validation Rate is 100 percent, calculated as 100 percent × 6 / 6. The result exceeds the 95 percent validation threshold. The initiative is Validated.

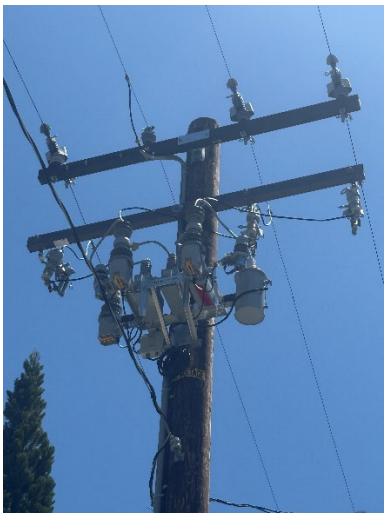
The IE also reviewed the sampled capacitor banks for workmanship, installation accuracy, and SCADA connectivity. Based on the field observations and supporting documentation, the IE did not identify visible workmanship or commissioning exceptions.

For illustrative examples, see Figure 8: Example Capacitor Bank Upgrade Project Field Images.

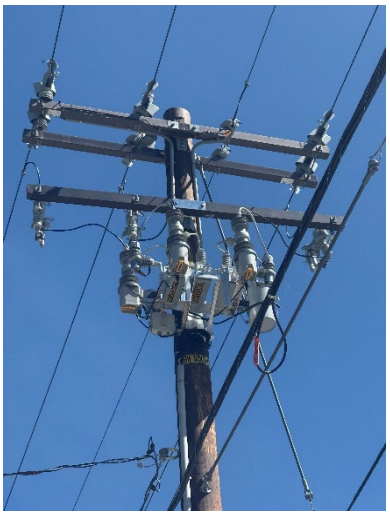
Figure 8:
Example Capacitor Bank Upgrade Project Field Images



15076BV Clubview - C10230BV



10552BV Pineknot - C10552BV



5691BV Lagonita - C5691BV

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative

Table 18: Capacitor Bank Upgrade Project

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR021 Response	Initiative Validation Rate
6 Capacitor Banks	8 Capacitor Banks	6 Capacitor Banks	6 Capacitor Banks	100%

GD_15 – 8.1.2.8 – Fuse TripSaver Automation – Focus & Field Verifiable

Fuse TripSaver automation is intended to reduce wildfire and PSPS-related risk by replacing standard fuses with automated TripSaver devices that detect and clear momentary faults without sustained outages, then connecting those devices to BVES's SCADA network for remote monitoring and operation. Automated TripSavers reduce the frequency and duration of customer outages, limit the scope of PSPS de-energization events, and allow operations to monitor and adjust device settings remotely without dispatching field crews into elevated fire-risk areas. As described in BVES's 2023-2025 WMP, Section 8.1.2.8, BVES uses TripSaver automation as a grid hardening activity supporting wildfire mitigation. BVES's 2025 target for this initiative was 50 TripSaver installations, with a 29 percent risk-reduction goal identified in the 2025 WMP.

BVES reported 49 TripSaver installations against the 50-unit 2025 target. BVES's 2025 Q4 QDR reported 50 TripSavers for 2025. BVES's 2025 AIR, dated April 1, 2026, reported 73 TripSavers and classified the initiative as Achieved, noting that the cumulative three-year target of 110 TripSavers was met exactly. In response to Data Request DR049, BVES clarified that the difference between the QDR and AIR figures reflects 23 TripSavers scheduled for installation in 2024 that were subject to a connection issue resolved in early 2025, at which point those 23 units were finalized to complete the 2024 target; of the 50 TripSavers scheduled for 2025, all were initially installed, but at pole 14000BV amperage issues required removal of TripSavers following installation, bringing the final count at that pole to one (1) and the 2025 total to 49. BVES also identified a clerical correction in the data, with four (4) TripSavers reported at pole 4409BV rather than the five (5) originally listed. In its frontloaded data response and DR049, BVES provided consolidated GIS data covering the 2025 installations across 28 pole locations.

Because the reported population exceeded fifteen units, the IE determined the sample size using Cochran's formula with finite population correction. The IE conducted field observations at 46 TripSaver units across 28 pole locations, capturing geo-referenced photographs at each site and confirming device identification and TripSaver installation consistent with design.

Across the 28 sampled pole locations, the IE confirmed TripSaver installations at all 28 locations. The IE identified data-accuracy items at four (4) of the sampled locations: at one (1) pole, the IE was unable to capture detailed field photographs of the four (4) TripSaver units due to site access conditions, with the pole and installations otherwise appearing in place based on observation; at three (3) additional poles, the GPS coordinates aligned with TripSaver installations but the in-field pole tags differed from the Structure IDs reported by BVES. The IE treats these four (4) items as data-accuracy and access matters rather than workmanship findings; TripSaver installations were observed at each location. The IE field verified 46 TripSaver units across 28 pole locations. All 46 sampled units were observed or otherwise confirmed at the sampled locations, yielding a Sample Validation Rate of 100 percent. Applying the Initiative Validation Rate formula, the Sample Validation Rate multiplied by BVES-reported completion divided by the WMP target, the Initiative Validation Rate is 98 percent, calculated as 100 percent × 49 / 50. The result exceeds the 95 percent validation threshold. The initiative is Validated.

The IE also reviewed the sampled locations for workmanship and installation accuracy. The four (4) items above are carried as asset-tag and access reconciliation matters for BVES; the field review identified no additional workmanship exceptions across the remaining sampled locations. The pole-14000BV amperage-driven removal is documented in the DR049 response and reflected in the 49-unit 2025 total.

For illustrative examples, please refer to Figure 9: Example Fuse TripSaver Automation Field Images.

Figure 9:
Example Fuse TripSaver Automation Field Images

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative

Table 19: Fuse TripSaver Automation

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR049 Response	Initiative Validation Rate
50 TripSavers	73 TripSavers	50 TripSavers	49 TripSavers	98%

GD_16 – 8.1.2.8 – Server Room Build-Out – Non-Focus & Field Verifiable

The Server Room Build-Out is intended to reduce wildfire and PSPS-related risk by expanding and upgrading BVES's IT server room to support continued growth of grid automation systems, including SCADA, substation and field device automation, the IP communications network, and the GIS asset database. As described in BVES's 2023-2025 WMP, Section 8.1.2.8, BVES uses the server room upgrade as a supporting infrastructure activity for the broader grid hardening and automation program. BVES's 2025 target for this initiative was 100 percent project completion of

the Server Room upgrade. The WMP did not include a quantified initiative-specific risk-reduction target for this initiative.

BVES reported the Server Room Build-Out as Completed in 2025. BVES's 2025 AIR, dated April 1, 2026, and 2025 Q4 QDR both reflected completion of the project. In its frontloaded data response, BVES provided documentation of the server room upgrades completed during 2025, including installation of new server hardware, supporting equipment, server configuration work, and associated software licenses.

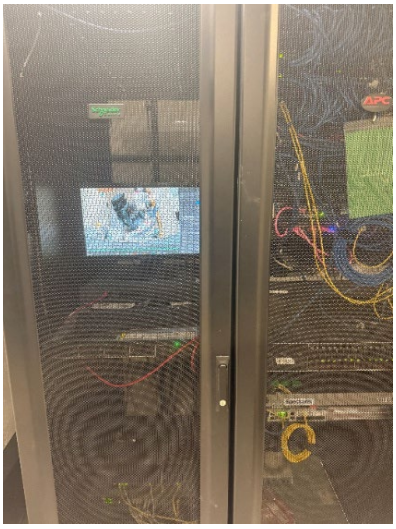
Because the reported field population consisted of one (1) facility, the IE reviewed the full population rather than applying Cochran-based statistical sampling, consistent with the engagement sampling methodology for populations of fifteen or fewer units. No calibration or alternate sample allotment was required.

The IE conducted a site visit to the BVES Server Room on May 4, 2026, escorted by BVES IT personnel, capturing photographs of the upgraded server room environment and verifying that the upgrades described in BVES's documentation had been physically installed. The IE confirmed that server hardware and supporting equipment installations were completed, that the server room environment and configuration were consistent with the upgrades documented by BVES, and that the completed work supported BVES's stated objective of expanding server room capacity to accommodate continued grid automation expansion.

The completed work met the initiative criteria, yielding a Sample Validation Rate of 100 percent. Applying the Initiative Validation Rate formula on a project-completion basis, the Initiative Validation Rate is 100 percent against the 100 percent project completion target. The result exceeds the 95 percent validation threshold. The initiative is Validated.

For illustrative examples, see Figure 10: Example Server Room Field Images.

Figure 10: Example Server Room Build-Out Field Images



Server Room Equipment

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative

Table 20: Server Room Build-Out

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
100% Project Completion	Completed	Completed	Project Completion Documentation	100%

GD_17 – 8.1.2.8 – Distribution Management Center – Non-Focus & Field Verifiable

The Distribution Management Center is intended to reduce wildfire and PSPS-related risk by establishing a centralized control room adjacent to BVES's Emergency Operations Center, providing operators with consolidated situational awareness across SCADA, the Outage Management System, BVES's weather station network, GIS applications, customer notification platforms, and field crew communications. As described in BVES's 2023-2025 WMP, Section 8.1.2.8, BVES's 2025 target for this initiative was 100 percent project completion of the Distribution Management Center, with the method of verification identified as Project Timeline and Budget. The Distribution Management Center was completed in 2024 and reported as completed at that time.

Per BVES's 2025 AIR, dated April 1, 2026, and 2025 Q4 QDR, the Distribution Management Center initiative was reflected as Completed. In response to the frontloaded data request, BVES confirmed that the Distribution Management Center was completed in 2024 and that no DMC build-out work was performed in 2025.

Because no 2025 target activity or completed 2025 work was identified for this initiative, no field-verification population existed for Implementation Year 2025, and the IE did not perform field sampling for GD_17. Based on the documentation reviewed, the IE determined this initiative Not Applicable for the 2025 review period. BVES met its WMP target of 100 percent project completion through its 2024 work.

Table 21: Distribution Management Center

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
100% Project Completion	Completed	Completed	Completed in 2024	N/A

GD_19 – 8.1.2.10 – Tree Attachment Removal Project – Focus & Field Verifiable

Tree attachment removal is intended to reduce wildfire ignition risk by removing distribution-line attachments that are physically affixed to living trees, replacing them with poles as necessary to safely reroute distribution and service lines, and eliminating ignition exposure from vegetation contact, branch sway, and conductor-insulation damage caused by tree growth and movement. As described in BVES's 2023-2025 WMP, Section 8.1.2.10, BVES uses tree attachment removal as a grid hardening activity supporting wildfire mitigation. BVES's 2025 target for this initiative was 100 tree attachment removals in the HFTD, with a 10 percent risk-reduction goal identified in the 2025 WMP.

BVES reported completion of 110 tree attachment removals in 2025, exceeding the 100-attachment target. BVES's 2025 AIR, dated April 1, 2026, and 2025 Q4 QDR both reported 110 attachments removed and classified the initiative as Achieved. In its frontloaded data response and in response to Data Request DR061, BVES provided consolidated GIS data, project records, and address information covering all 110 tree attachment removals, including structure identifier, circuit identifier, GPS coordinates, address, and completion date.

Because the reported population exceeded fifteen units, the IE determined the sample size using Cochran's formula with finite population correction. The IE conducted field observations at 78 of the 110 reported tree attachment removal locations, capturing geo-referenced photographs at each site and confirming structure identification, removal of the tree attachment, and replacement workmanship consistent with industry standards.

Of the 78 sampled locations, the IE identified the following findings:

- One (1) location identified in the GIS data, the field asset was a tree rather than a pole, with no tree attachment removal observed.
- Three (3) poles located at the provided GPS coordinates had tree attachment removal work completed; however, the in-field pole tags differed from the Structure IDs reported by BVES.
- Two (2) pole locations were unable to be captured due to site access conditions, as both poles are located within customer-controlled backyards where field access could not be obtained at the time of verification.
- Two (2) pole locations identified in the GIS data appeared as duplicate Structure IDs with differing GPS coordinates in the records provided, and IE was unable to field verify the work at these two pole locations.

Treating the four (4) verification-constrained locations as not contributing to either the validated or failed counts and the one (1) tree-rather-than-pole location identified, the Sample Validation Rate is 73 of 74 verifiable locations, or 98.6 percent. Applying the Initiative Validation Rate formula, the Sample Validation Rate multiplied by BVES-reported completion divided by the WMP target, the Initiative Validation Rate is 108 percent, calculated as 98.6 percent × 110 / 100. The result exceeds the 95 percent validation threshold. The initiative is Validated.

For illustrative examples, please refer to Figure 11: Example Tree Attachment Removal Project Field Images.

Figure 11:
Example Tree Attachment Removal Project Field Images

1210098CTC Castle Glen

15841 Castle Glen

13239BV Boulder

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative

Table 22: Tree Attachment Removal Project

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & Response	Initiative Validation Rate
100 Removals	110 Removals	110 Removals	110 Removals	108%

GD_21 – 8.1.2.12 BVPP Phase 4 Upgrade Project – Focus and Non-Field Verifiable

This program is aimed at reducing the impacts of power outages from proactive de-energization and preserving essential services by improving the reliability of the Bear Balley Power Plant (BVPP). 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. These upgrades are intended to significantly lower the risk of extended outages during de-energization events, especially during cold weather, which poses a heightened risk to vulnerable populations.

In support of Initiative GD_21, BVES was asked to provide documentation demonstrating progress toward the stated 2025 goal of 100% project completion for this initiative. Phase 4 upgrades included installing updated engine controls on all engines to a current controls system that will allow efficient start/stop functions, consolidated controls, and synchronization monitoring. There was also a plan to replace the Detonation Sensing Module (DSM) Controls on all engines with a detcon system that will allow for visual DSM monitoring and repair any faulty wiring. Lastly, the project was scheduled to replace the governor speed control systems on all engines with a ProAct system and EX Gen control. The utility responded by submitting a statement as follows: "*BVPP Phase 4 upgrades were completed in 2024*."

As noted in the BVES 2025 IE ARC final report dated June 30, 2025 (for the 2024 WMP cycle), this initiative was complete and was verified through an executed budget, Phase 4 PSPS risk, power plan 2024 timeline, and an SDP invoice for Phase 3 (DR023). Therefore, based on this analysis and the verification methods provided for 2024, IE has validated this initiative.

Table 23: BVPP Phase 4 Upgrade Project

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
100% Project Completion	N/A	Completed	BVPP Phase 4 upgrades were completed in 2024.	100%

GD_22 – 8.1.2.12 Partial Safety and Technical Upgrades to Maltby Substation – Non-Focus and Non-Field Verifiable

In support of Initiative GD_22, BVES was asked to provide documentation demonstrating progress toward the stated 2025 goal of 100% project completion for this initiative. This project focused on replacing overhead regulators with pad mounted regulators, installing pad mounted IntelliRupter switches, converting the substation to be fully underground and updating substation controls. The Maltby substation is located in one of the more densely populated residential areas of Big Bear City on the East end of the BVES service area. This two 3.75 MVA transformer substation converts 34.5 kV sub-transmission to two 4.160 kV distribution circuits (Paradise and Erwin Lake circuits), and these circuits also provide power to small businesses in the area. It is noted that the IntelliRupter switches will significantly (1) Improve the ability of the circuits to be rapidly de-energized when fault conditions are detected, and (2) The IntelliRupter when in automatic mode will test at approximately 10% power when a fault is detected, thereby significantly reducing the possibility of causing an ignition.

The utility responded by submitting a timeline for the Maltby Substation indicating the date that each project milestone was completed. 10 out of the 11 milestones were completed from August to November of 2025. The one outstanding milestone was the Switchgear Enclosure, and BVES indicated they ordered this on November 18, 2025.

In a subsequent data request (DR027), the IE asked BVES to provide documentation that the switch gear enclosure had been ordered and installed. BVES responded with the following statement: *"The Maltby switchgear enclosure is currently being constructed as of 4/17/2025 per the attached photographs and design. Please be aware that this enclosure was not part of the WMP and is an additional enhancement to the substation that Bear Valley chose to undertake. It was billed as part of the Maltby work order (WO60400231) but is not part of the WMP-required process to finish upgrading Maltby substation to all padmounted structures, which was completed per the timeline shared in the frontload data request."*

Based upon this analysis and the documentation reviewed, the IE has validated this initiative.

Table 24: Partial Safety and Technical Upgrades to Maltby Substation

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR027 Response	Initiative Validation Rate
100% Project Completion	Project 100% Completed	Completed	Maltby Substation Timeline	100%

GD_23 – 8.1.2.12 Safety and Technical Upgrades to the Lake Substation – Focus and Non-Field Verifiable

This initiative relates to upgrades/projects for the Lake Substation. This initiative had a "No Action" target for 2025 and BVES did not provide a risk reduction goal. In support of Initiative

GD_23, BVES was asked to provide documentation demonstrating progress of any projects for the Lake Substation.

The utility responded with a timeline for the Lake Substation detailing two items: contractors started paving roadway on October 20, 2025, and the roadway was paved on October 31, 2025.

Although BVES provided documentation indicating progress on the Lake Substation, the WMP outlined a target of "No Action" and therefore this initiative was determined to be not applicable.

Table 25: Safety and Technical Upgrades to the Lake Substation

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
No Action	N/A	In Progress	Lake Substation Timeline	Not Applicable

GD_24 – 8.1.2.12 Partial Safety and Technical Upgrades to Village Substation – Non-Focus and Non-Field Verifiable

This initiative focused on hardening project activities for the Village Substation.

In support of Initiative GD_24, BVES was asked to provide documentation demonstrating project activities in 2025. The utility responded with the following statement: "BVES did not start the Village substation hardening project in 2025." BVES stated in their 2025 QDR Q4 that they have moved this target to 2028 and that this has been updated in their 2026-2028 WMP.

Based on this analysis, the documentation reviewed, and ultimately having a "No Action" target for 2025, the IE has determined this initiative to be not applicable.

Table 26: Partial Safety and Technical Upgrades to Village Substation

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
No Action	N/A	Delayed	Village Substation Statement	Not Applicable

GD_25 – 8.1.3.1 Detailed Inspection Program – Non-Focus and Non-Field Verifiable

The GD_25 objective is to perform a detailed inspection, which is considered a more careful visual and diagnostic exam of individual pieces of equipment. BVES's Field Inspector performs the Detailed Inspections and is required to be a Journeyman Lineman experienced in inspection of electric transmission and distribution facilities and power lines. The inspector records the results of the diagnostic and visual examinations and rates the condition of the equipment. These inspections are designed to identify any existing, including minor, defects. These may include, but are not limited to, open wire secondary clearance, corona effect on cross-arms, warning signage

issues, visibility strips and pole-tag issues, and rotten poles. If any defects are identified, BVES prioritizes the defect resolution based on risk and resolves the issues in compliance with GO 95 Rule 18 timeframes. The WMP has a risk reduction goal of 4.36% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved.

The initiative target for 2025 was 53 circuit miles of detailed inspections. According to BVES's 2025 annual EC AIR, the utility inspected 53 circuit miles. BVES provided a list of all inspections completed under this initiative for 2025, which included 1,636 inspection points across five circuits: Garstin, North Shore, Clubview, Sunrise, and Sunset. Cross referencing with the Circuit Mileage by Circuit documentation provided by BVES, these five circuits encompass a combined total of 49 circuit miles. Further analysis was conducted; the IE cross referenced the total number of points in the frontload data with the total number of points in the ResourceKeeper database to ensure continuity of data. Based on this analysis, it can be determined that BVES did inspect these five circuits in their entirety, however, based on the documentation provided, the IE can only verify 49 circuit miles, leading to a 4 circuit miles shortfall from the target.

The IE requested 34 inspection reports, all of which were from HFTD 2 as that was the only HFTD represented in the frontload data. BVES responded that inspection findings are populated in Excel format and that no additional PDF reports exist. The IE reviewed the sampling data provided and found no discrepancies or issues. Although all the sampling data was validated, due to the four circuit mileage shortfall, the initiative validation rate is 92% which is outside of the 95% Energy Safety Threshold.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative.

Table 27: Detailed Inspection Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR030 Response	Initiative Validation Rate
53 Circuit Miles	53 Circuit Miles	53 Circuit Miles	49 Circuit Miles	92%

GD_26 – 8.1.3.2 Patrol Inspection Program – Non-Focus and Non-Field Verifiable

BVES's Inspection Program requires a patrol inspection of all overhead facilities each year. A "patrol inspection" is a visual inspection designed to identify obvious problems, gross defects, and hazards. Patrol inspections are performed by BVES's Field Inspector who is required to be a Journeyman Lineman experienced in inspection of electric transmission and distribution facilities and power lines. Patrol inspections are conducted annually and cover the entirety of BVES's overhead facilities.

The 2023-2025 WMP set a target of 205 circuit miles inspected. BVES provided a risk reduction goal of 4.36% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was

achieved. BVES claimed 205 circuit miles of inspections in the 2025 AIR. Data provided in the frontload request identified the circuits inspected and mileage per circuit as well as inspection forms and completion dates. When circuit miles were correlated with the circuits claimed in the Patroled Inspections spreadsheet, the total was 197 circuit miles. This discrepancy is because the Baldwin circuit (8.3 circuit miles) was not included in the Patroled [sic] Inspection frontload data.

The IE requested 14 inspection reports coinciding with the records provided in the frontload data. BVES responded by providing inspection reports that contained information including, but not limited to, Circuit Name, Inspection Type, Inspector, and Date. Dates on the inspection reports aligned with the dates provided in the frontload Patroled [sic] Inspections spreadsheet except for Pioneer circuit, where the inspection report was dated August 5, 2025, and the spreadsheet inspection was dated September 12, 2025. Fields for Voltage and Offcycle were not completed on two (2) inspection reports (Boulder and Clubview).

The IE was only able to validate circuit miles for those circuits which were included in the Patroled [sic] Inspections spreadsheet and, as Baldwin circuit was not included, the IE could not verify or validate inspections of this circuit. Therefore, the IE validates 197 circuit miles for GD_26 resulting in a 96% initiative validation rate, within the Energy Safety threshold.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative

Table 28: Patrol Inspection Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data and DR031 Response	Initiative Validation Rate
205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	197 Circuit Miles	96%

GD_27 – 8.1.3.3 UAV Thermography – Non-Focus and Non-Field Verifiable

The UAV Thermography survey provides quick and meaningful inspections results other inspections methods are not able to provide. Generally, thermographic hot spots are indicative of potential equipment degradation or failure. Each finding is investigated by personnel qualified in evaluating asset conditions to validate the identified conditions and reassign the priority per GO 95, if deemed appropriate. UAV thermography inspections are conducted annually and cover the entirety of BVES's overhead facilities. BVES's entire service territory is in HFTD Tier 2 or Tier 3, therefore risk prioritization scheduling is not used in assigning these inspections.

The 2023-2025 WMP set a target of 205 circuit miles inspected. BVES provided a risk reduction goal of 4.36% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. BVES was asked to provide a list of all completed UAV HD Photography/Videography inspections which occurred during 2025 with information on dates of completion, geographical area, issues identified, HFTD Tier Classification, and if an open work order was generated. The utility responded by submitting a list of 6,613 completed inspections with fields which included,

but were not limited to, Site ID, Actual Pole Number, various component identifiers/issues, Ground Visit Date, Photo Review, etc. The IE requested a breakdown of circuit mileage by circuit in DR002 and BVES provided this information in an Excel spreadsheet which was able to confirm that BVES inspected all circuits comprising the 205 circuit miles. Further, the IE cross-referenced the total number of points in the frontload data with the total number of poles in the ResourceKeeper database to ensure continuity of data.

The IE requested 34 total inspection reports coinciding with records in the Sampling Attachment spreadsheet. Any associated photos or work/repair orders were also requested. In response, the IE was given access to the ResourceKeeper records management system in order to validate each of the 34 inspection reports. The reports in the ResourceKeeper system directly aligned with the frontload data provided with the exception of the actual pole numbers (different in ResourceKeeper vs. frontload data) and pole tag photos (frontload data states "Pole Tag Photo" as "Yes" for all items but no tag photos were found in ResourceKeeper). BVES should ensure that pole numbers on the database export match the pole number listed on the ResourceKeeper database for accountability and auditing purposes.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 29: UAV Thermography

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data and DR032 Response	Initiative Validation Rate
205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	100%

GD_28 – 8.1.3.4 UAV HD Photography/Videography – Non-Focus and Non-Field Verifiable

Many electric utilities have found inspections utilizing UAVs are highly effective at identifying facilities degradations and issues that Ground Patrols and detailed inspections would not necessarily reveal. The UAVs film the facilities using high-definitions video photography while maintaining and accurate date/time and geolocation stamp on the recorded video stream. The video recordings are then reviewed by qualified analysts who can slow down the recording so as to note any issues. Discrepancies are then identified, evaluated, recorded, and remediation or further investigation is assigned. UAV HD Photography/videography inspections are conducted annually and cover the entirety of BVES's overhead facilities. All of BVES's service territory is in HFTD Tier 2 or Tier 3, therefore risk prioritization scheduling is not used in assigning these inspections.

The 2023-2025 WMP set a target of 205 circuit miles inspected. BVES provided a risk reduction goal of 4.36% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. BVES was asked to provide a list of all completed UAV HD Photography/Videography inspections which occurred during 2025 with information on dates of completion, geographical area, issues identified, HFTD Tier Classification, and if an open work order was generated. The utility responded by submitting a list of 6,613 completed inspections with fields which included,

but were not limited to, Site ID, Actual Pole Number, various component identifiers/issues, Ground Visit Date, Photo Review, etc. The IE requested a breakdown of circuit mileage by circuit in DR002 and BVES provided this information in an Excel spreadsheet which was able to confirm that BVES inspected all circuits comprising the 205 circuit miles. Further, the IE cross-referenced the total number of points in the frontload data with the total number of poles in the ResourceKeeper database to ensure continuity of data.

The IE requested 34 total inspection reports coinciding with records in the Sampling Attachment spreadsheet. Any associated photos or work/repair orders were also requested. In response, the IE was given access to the ResourceKeeper records management system in order to validate each of the 34 inspection reports. The reports in the ResourceKeeper system directly aligned with the frontload data provided with the exception of the actual pole numbers (different in ResourceKeeper vs. frontload data) and pole tag photos (frontload data states "Pole Tag Photo" as "Yes" for all items but no tag photos were found in ResourceKeeper). BVES should ensure that pole numbers on the database export match the pole number listed on the ResourceKeeper database for accountability and auditing purposes.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 30: UAV HD Photography/Videography

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data and DR033 Response	Initiative Validation Rate
205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	100%

GD_29 – 8.1.3.1 LiDAR Inspections – Non-Focus and Non-Field Verifiable

BVES conducts one LiDAR sweep of its entire service area per year to evaluate the effectiveness of clearance efforts and identify potential wildfire hazards. This is an enhanced inspection using Light Detection and Ranging (LiDAR) inspections and analysis, which uses a system of lasers and software to develop surveys of the overhead sub-transmission and distribution systems, to accurately determine vegetation clearances to conductors. LiDAR inspections are conducted annually and cover the entirety of BVES's overhead facilities. All of BVES's service territory is in HFTD Tier 2 or Tier 3, therefore risk prioritization scheduling is not used in assigning these inspections.

The 2023-2025 WMP set a target of 205 circuit miles inspected. BVES provided a risk reduction goal of 4.36% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. Data provided in spreadsheet format as part of the frontload request included 197 records with information regarding Date, Level, Clearance, Species, Location, Notes, Circuit, Completed, and HFTD; the IE could not identify a circuit mile field. The IE requested a breakdown of circuit mileage by circuit in DR002 and BVES provided this information in an Excel spreadsheet. A total of 18 circuits were listed in the frontload data spreadsheet, cross referencing with the Circuit

Mileage by Circuit document, totaling 187 circuit miles. Further, the IE cross referenced the total number of points in the frontload data with the total number of poles in the ResourceKeeper database to ensure continuity of data. Based on this analysis and the documentation provided, BVES has a shortfall of 18 circuit miles for GD_29.

The IE requested 30 total inspection reports coinciding with records in the Sampling Attachment spreadsheet in DR034. Any associated photos or work/repair orders were also requested. BVES provided a written response indicating that inspection reports generate in Excel format and no additional PDF reports exist. The IE reviewed the requested sampling data in the frontload spreadsheet and identified no discrepancies.

Although all sampling data was validated, the total number of circuit miles based on the circuits listed in the frontload data spreadsheet led to a shortfall of 18 circuit miles from the target, resulting in an initiative validation rate of 91%, outside the threshold set forth by Energy Safety.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative.

Table 31: LiDAR Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data and DR034 Response	Initiative Validation Rate
205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	187 Circuit Miles	91%

GD_30 – 8.1.3.6 3rd Party Ground Patrol – Non-Focus and Non-Field Verifiable

BVES contracts experienced and qualified electrical distribution asset inspection contractors to perform this ground patrol inspection. This inspection satisfies GO 165 patrol inspection requirements and is in effect an additional annual GO 165 patrol inspection to the one that the BVES Field Inspector performs. BVES believes this additional patrol is warranted due to the local climate; likelihood of icing conditions; tree limbs and branches subject to weakening due to repeated high winds, snow, and ice weight; high elevation; other local conditions; difficulty accessing vegetation for trimming near bare conductors, species growth rates and characteristics; and the fact that the service area is designated “very dry” or “dry” approximately 80% of the time in the NFDRS. This environment, coupled with the fact that the fire season is now year-round, creates a high-risk condition that can be mitigated by increasing patrols.

The 2023-2025 WMP set a target of 205 circuit miles inspected. BVES provided a risk reduction goal of 4.36% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. Data provided in spreadsheet format as part of the frontload request itemizes inspections by pole; the IE could not identify a circuit mile field. The IE cross referenced the total number of points in the frontload data with the total number of poles in the ResourceKeeper database to ensure continuity of data. Fields present included, but were not limited to, ID, Lat/Lon, Inspector, various types of deficiencies, Circuit ID, Pole Number, and HFTD class. There were 6,692 records in the

spreadsheet. A second tab labelled "Pole Violations", contained 19 records of findings such as excessive pole lean, split or decayed tops, and loose down guys. Cross referencing the circuits listed in the frontload data with the Circuit Mileage by Circuit documentation provided by BVES, the IE verified that the listed circuits encompass all 205 circuit miles.

The IE requested 34 total inspection reports coinciding with records in the Sampling Attachment spreadsheet. Any associated photos or work/repair orders were also requested. BVES provided a written response indicating that inspection reports are generated in Excel format and no additional PDF reports exist. The IE reviewed the requested sampling data in the frontload spreadsheet and identified no discrepancies.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 32: 3rd Party Ground Patrol

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data and DR035 Response	Initiative Validation Rate
205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	100%

GD_31 – 8.1.3.7 Intrusive Pole Inspections – Non-Focus and Non-Field Verifiable

This initiative monitors the age and structural integrity of existing wood poles through means of a more detailed assessment of the pole's condition such as coring areas of identified damage and visual inspection of the poles apart from pole loading assessments results. Intrusive inspections involve movement of soil, taking samples for analysis, and using more sophisticated diagnostic tools beyond visual inspections of instrument reading. BVES schedules these inspections based upon the age of the poles and the order of the review cycles, in addition to other efforts such as pole loading assessments or pole replacement projects which are prioritized by risk.

The WMP set a target of 850 poles inspected. BVES provided a risk reduction goal of 4.36% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. Data provided in spreadsheet format as part of the frontload request itemizes inspections by pole. Fields include ID, Lat/Lon, Inspector, various types of deficiencies, and Pole Number. There were 920 inspection records in the spreadsheet. Four of these records did not have a pole number. When pole number was filtered for uniqueness, 915 records were retained.

The IE requested 33 total inspection reports coinciding with records in the Sampling Attachment spreadsheet. Any associated photos or work/repair orders were also requested. BVES provided a written response indicating that inspection reports are generated in Excel format and no additional PDF reports exist. The IE reviewed the requested sampling data in the frontload spreadsheet and identified no discrepancies.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 33: Intrusive Pole Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data and DR036 Response	Initiative Validation Rate
850 Poles	850 Poles	850 Poles	915 Poles	108%

GD_32 – 8.1.3.8 Substation Inspections – Non-Focus and Non-Field Verifiable

Substation inspections provide both reliability and incidental wildfire mitigation benefits. Substation inspections mitigate the risk of equipment failures which have the potential to cause wildfire ignitions. Gas in oil analysis is performed every year. Other inspections, such as oil levels, temperature, and contamination, are also performed. These inspections will determine when a transformer is nearing end of life so it can be scheduled for replacement. BVES conducts monthly inspections for all 13 substations in compliance with GO 174.

The WMP set a target of 144 substation inspections. BVES provided a risk reduction goal of 4.36% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. The frontload data included a spreadsheet listing 12 substations with their monthly inspection dates. No 13th substation was identified in the data. Notably, the February inspection at Village substation was not performed, according to the spreadsheet. The data confirms that regular monthly inspections occur across the 12 listed substations, totaling 143 inspections for 2025.

The IE requested 28 total inspection reports coinciding with records in the Sampling Attachment spreadsheet. Any associated photos or work/repair orders were also requested. In response, BVES provided 27 proprietary substation inspection sheets as the base sample with date, inspector, station, time of reading, ambient temperature, and various other metrics. One alternate substation inspection report, Meadow substation, June inspection, was used to reach the full 28 inspection reports requested. Of these 28 inspection reports, 12 were completed on the date claimed in the frontload spreadsheet. The remaining 16 occurred within the month but not on the date claimed in the spreadsheet. Additionally, the substation inspection report for March at Fawnskin did not have a year and could not be confirmed to have occurred in 2025. Notes of any deficiencies found during substation inspections were detailed on the forms. BVES should ensure that inspection dates on the export data matches the inspection date listed on the inspection form for accountability and auditing purposes.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 34: Substation Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data and DR037 Response	Initiative Validation Rate
144 Substation Inspections	156 Substation Inspections	156 Substation Inspections	143 Substation Inspections	95%

GD_33 – 8.1.4.3 Equipment Maintenance & Repair – Non-Focus and Non-Field Verifiable

BVES routinely maintains these electrical assets to prevent ignition risk through operations and maintenance practices. This activity addresses the remediation, adjustments, or installation of new equipment to improve or replace existing connectors, including hotline clamps. BVES does not have any hotline clamps on its sub-transmission system and does not have an hotline clamps in HFTD Tier 3. Currently, it is BVES's policy that when a hotline clamp is found, to note and report any hotline clamp locations to the Field Operations Supervisor and Engineering staff for tracking in GIS. Upon identification, the hotline clamp is identified for removal as soon as feasible.

The WMP set a target of replacing 100% of connectors as needed. BVES provided a risk reduction goal of 4.36% for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met. Data in the frontload request was provided as a spreadsheet with 16 records. These records include, but are not limited to, information such as pole number, address, lat/lon, circuit, pole type, height, and priority. All 16 records were assigned priority Level 1 and were identified across five (5) of BVES' 22 circuits.

The IE requested documentation for all repairs listed in the frontload data. BVES responded by providing 16 work orders as PDF files. Work orders included information such as address, date, and circuit, and were signed and stamped by field inspectors. Of the repairs, six (6) were intrusive pole changes, eight (8) were intrusive inspections, and the remaining two (2) were intrusive pole replacements. One of the intrusive pole replacements had mismatched information between the frontload spreadsheet and the work order, namely the Pole Number, 16684BV (WO) & 6684BV (Frontload) and Address, 40247 Lakeview (WO) & 40249 Lakeview (Frontload). Due to this mismatch, the IE invalidated the sampling data for this pole number, however this did not affect the sampling validation rate due to review of more than the required samples. All other work orders aligned with frontload data.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 35: Equipment Maintenance & Repair

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data and DR050 Response	Initiative Validation Rate
As Need Maintenance (100% of Budget)	N/A	In Progress	Maintenance Repair Log 15 Work Orders	100%

GD_34 – 8.1.5 Asset Management and Inspection Enterprise System(s) – Non-Focus and Non-Field Verifiable

BVES has made key updates to the main internal inspection enterprise system by integrating all internal inspections into one central database via an application known as "iRestore". Further,

BVES has added a Detailed Inspections Portal, a Substation Inspection Portal, and a Vegetation Management Inventory database. All of these together create a reliable, searchable, and comprehensive database for BVES to access. BVES planned on adding a meter inspection portal to iRestore and anticipated completion in 2024.

The WMP set a target of 100% maintenance of the asset management and inspection enterprise system(s). BVES identified a 4.36% risk reduction goal for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met. Documentation provided as part of the frontload data consists of three (3) PDF files. These files are fully executed contracts with iRestore. One is for Inspection app dated February 3, 2021, and continuing for six years. One is for Vegetation Inventory manager App and automatic dashboard, dated December 29, 2021, and continuing for six years. And the third is for First Responder app module license renewal, dated October 18, 2022, continuing for six years. All iRestore contract agreements and products were in effect during 2025.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 36: Asset Management and Inspection Enterprise System(s)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
100% Maintenance of Asset Management System	In Progress	In Progress	Three iRestore Fully Executed Contracts	100%

GD_35 – 8.1.6 Asset Quality Assurance/Quality Control – Non-Focus and Non-Field Verifiable

The Asset Quality Control (QC) initiative ensures that WMP work meets established quality standards through a formal QC process. Per the 2023–2025 WMP, the 2025 target was to complete 20 asset QCs on WMP work, which was associated with a 4.36% risk-reduction goal. In the 2025 EC AIR, BVES stated that risk reduction percentage was "N/A."

In support of Initiative GD_35, BVES was asked to provide documentation that the stated 2025 goal of 20 asset QA/QCs on WMP work was completed. In its 2025 Q4 QDR, BVES reported the completion of 20 asset QCs, meeting its annual target. The utility responded by submitting an excel spreadsheet with addresses and dates of completion for the 20 QCs performed, including the date, pole numbers, circuit, and type of work reviewed. The work reviewed under this initiative occurred between February and October of 2025.

The IE performed a documentation review of a sample of these records. The IE reviewed records for 13 of the 20 completed QCs to verify the reported work. No issues were identified during the IE's review of the sample QC data.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 37: Asset Quality Assurance/Quality Control

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR041 Response	Initiative Validation Rate
20 Asset QCs on WMP Work	20 Asset QCs	20 Asset QCs	20 Asset QCs	100%

GD_36 – 8.1.7 Open Work Orders – Non-Focus and Non-Field Verifiable

The 2023-2025 WMP initiative for open work orders (WO) management set a target of resolving all discrepancies within the timeframes established under General Order 95 (GO 95), Rule 18, with verification through a maintained order log. BVES did not set a risk reduction goal for this initiative.

BVES provided a 17-page GO 165 procedure document which outlines the required inspection cycles and facility types covered, demonstrating a formal process for identifying and managing deficiencies. Once an issue is discovered under GO 165 inspection protocols, it is then classified and managed under the timeframes and severity levels dictated by GO 95. The material(s) provided algin with the WMP initiative summary which describes the use of the iRestore system for tracking work orders, applying GO 95 timelines automatically, and ensuring prioritization based on severity, fire threat tier, and circuit risk. The documentation supports the stated intent of the WMP that all open work order remain in compliance.

Although BVES provided ample documentation that outlines the open work order procedure in alignment with GO165, BVES did not provide adequate documentation that demonstrates all open work orders were resolved within the GO95 timeframe. In the frontload data request, the IE asked for "…documentation proving that all open WO have been resolved." BVES should provide a work order log, refer to documentation provided for another initiative, or provide written narrative describing implementation of GD_36.

Based on this analysis and the documentation provided, the IE has not validated this initiative.

Table 38: Open Work Orders

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
All WO Resolved Within GO95 Timeframe	N/A	In Progress	GO165 Procedure Document	0%

GD_37 – 8.1.8.1 Equipment Settings to Reduce Wildfire Risk – Non-Focus and Non-Field Verifiable

BVES has addressed the requirements of the 2023-2025 WMP by outlining its operational protocols and equipment setting designed to reduce wildfire risk. The utility continues to rely on fast trip protective settings year-round across all high-voltage overhead circuits, a long-standing policy intended to minimize ignition potential in its high fire threat territory. From April through October, BVES implements 1-shot non-reclosing settings on reclosers and de-energizes select lines, while from November to March, devices revert to a three-shot to lockout configuration to optimize for system reliability. BVES has not reported any significant reliability tradeoffs and has not recorded any reportable ignitions in over 20 years.

The 2025 WMP outlined a target to review and evaluate the system settings to reduce wildfire risk and provided a 4.36% risk reduction goal. In the 2025 EC AIR, BVES did not state if the risk reduction target was met. As part of the frontload data BVES provided a 40-page Public Safety Power Shutoff (PSPS) procedures report updated March 5, 2025, and a 65-page Emergency and Disaster Response Plan updated March 31, 2022. While BVES did not elaborate extensively on the criteria or effectiveness estimates for each setting, it did provide sufficient evidence of existing protocols and risk-informed operations, which algin with its historical wildfire mitigation approach. Additional documentation consisted of a spreadsheet of Enhanced Powerline Safety Settings implemented in 2025. There were four (4) records, all dated September 29, 2025.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 39: Equipment Settings to Reduce Wildfire Risk

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Review and Evaluate System Settings	N/A	In Progress	System Settings Have Been Reviewed & Evaluated	100%

GD_38 – 8.1.8.2 Grid Response Procedures & Notifications – Non-Focus and Non-Field Verifiable

The GD_38 objective is to capture BVES's operational procedures it uses to respond to fault, ignitions, or other issues detected on its grid that may result in a wildfire incident, including locating the issue, prioritizing the issue, notifying relevant personnel and suppression resources, and minimizing and optimizing response times. This is achieved through their internal detection and response systems, including the use of SCADA, FLISR, trip savers, and customer call center input. The WMP has a risk reduction goal of 84.00% for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

The initiative target for 2025 is to continually evaluate its policies and procedures and review annually. BVES submitted a copy of the Emergency & Disaster Response Plan (EDRP) which details the formalized coordination structure and aligns with WMP expectations. A written response outlining the confidentiality agreement that BVES has in place with the local fire authority to share relevant stakeholder information to assist with emergencies, disasters, PSPS planning, preparedness, and response was provided. BVES verifies the three fire authority points of contact on file annually and hosts virtual meetings and other events with the fire authority and other critical facilities to educate on various emergency events. The documentation provided is sufficient to demonstrate that BVES has both the operational readiness and communication pathways necessary to respond effectively to wildfire risks from grid events, supporting the high-risk reduction impact assigned to this initiative.

The IE identified no issues or discrepancies during this review. Based on this analysis and the documentation provided, IE has validated this initiative.

Table 40: Grid Response Procedures & Notifications

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Review & Update Procedure Annually	N/A	In Progress	Procedures Have Been Reviewed and Updated	100%

GD_39 – 8.1.8.3 Personnel Work Procedures & Training in Conditions of Elevated Fire Risk – Non-Focus and Non-Field Verifiable

The GD_39 objective is to meet internally at least twice per year to train and review the EDRP and PSPS Plans and procedures. In addition, BVES conducts a monthly Safety Committee Meeting which includes management as well as key office and field personnel. BVES also conducts a monthly training class for emergency situations and for general safety for working in the office and in the field. These training classes provide the background for all BVES employees to understand how to address an emergency situation, if encountered. Sign-in sheets are utilized to track employee participation for all training classes. The WMP has a risk reduction goal of 3.62% for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

The initiative target for 2025 is finalize review on its policies and procedures. According to BVES's 2025 annual EC AIR, the utility completed this initiative. BVES submitted a set of documents that align with the Workforce Training and Coordination objectives of the 2025 Wildfire Mitigation Plan. The utility's submission includes a 40-page PSPS Procedures document, which addresses critical elements outlined in the WMP, including chain of responsibility, plan activation considerations, PSPS procedures, and public outreach communication. This document is dated March 5, 2025, indicating that the annual review has been finalized. BVES's also provided

a PSPS exercise spreadsheet which recorded 13 various activities with stakeholders. In addition, the utility provided their 2025 Public Safety Power Shutoff Post-Season Report.

The IE identified no issues or discrepancies during this review. Based on this analysis and the documentation provided, IE has validated this initiative.

Table 41: Personnel Work Procedures & Training in Conditions of Elevated Fire Risk

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Finalize Review	N/A	In Progress	Procedures Have Been Reviewed & Updated	100%

GD_40– 8.1.9 Workforce Planning – Non- Focus and Non- Field Verifiable

The GD_40 objective is to address, implement, and report on qualification and training practices regarding wildfire and PSPS mitigation for workers in target roles such as asset inspections, grid hardening, and risk event inspection. The WMP has a risk reduction goal of 3.62% for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

The initiative target for 2025 is to verify appropriate staffing levels for wildfire mitigation related activities. According to BVES's 2025 annual EC AIR, the utility completed this initiative. The documents provided by BVES align well with the WMP initiative's goal of ensuring proper workforce qualifications for wildfire and PSPS mitigation activities. The executed contracts demonstrate BVES' commitment to grid hardening and wildfire mitigation, which is a key element of the WMP. These contracts show that BVES is actively engaging contractors and establishing frameworks for the necessary tasks, reflecting their workforce planning efforts.

The QAQC asset workforce planning document offers insight into BVES' procedures for ensuring qualified workforce planning. The six-step process outlined in the QAQC document includes roles, procedures, and record-keeping, directly supporting the WMP's objective to ensure workforce qualifications and compliance. The inclusion of amendments and updates further demonstrates BVES' commitment to refining their workforce management practices and aligning them with the targets set in the WMP initiative.

The IE identified no issues or discrepancies during this review. Based on this analysis and the documentation provided, IE has validated this initiative.

Table 42: Workforce Planning Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Staffing Levels Verified	N/A	In Progress	2025 Staffing Levels Verified	100%

ST_1 – 5.4.5 Environmental Compliance and Permitting – Non-Focus and Non-Field Verifiable

The objective for this initiative, as provided in the 2023-2025 WMP and the 2025 Q4 QDR, is the development and implementation of process and procedures to ensure compliance with applicable environmental laws, regulations, and permitting related to the implementation of the WMP.

In support of Initiative ST_1, BVES was asked to provide at least one PDF document showing BVES environmental compliance and permitting procedures in the form of internal memo, utility bulletin, email, published operating procedure, etc. The utility responded by submitting a 42-page document entitled "*U.S. DEPARTMENT OF AGRICULTURE FOREST SERVICE SKI AREA TERM SPECIAL USE PERMIT AUTHORITY: National Forest Ski Area Permit Act of 1986 (16 U.S.C. 497B)".* This permit covers 651 acres of Snow Summit and 825 acres of Bear Mountain in San Bernardino Merdian Township (area maps shown in permit document). This permit is valid for 30 years.

Based upon this analysis and the documentation reviewed, the IE has validated this initiative.

Table 43: Environmental Compliance and Permitting

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Annual Review and Update	N/A	In Progress	Snow Summit Permit	100%

4.1.2.2 Funding Verification – Findings

The IE reviewed BVES's 2025 funding implementation for the Grid Design, Operations, and Maintenance category against the 2025 planned spend filed in the 2023–2025 WMP, using AIR Attachment D as the primary evidence base, supplemented by BVES's responses to BVES_DR004 and BVES_DR004.b and, where provided, the underlying vendor records.

The IE cross-checked BVES's standalone 2025 cost reporting (BVES_DR001) against AIR Attachment D and found agreement for the GD-category initiatives within rounding, except GD_23 (reported in BVES_DR001 at $1,374,524 but omitted from AIR Attachment D) and GD_29 (reported in BVES_DR001 at $85,366 against $76,200 in AIR Attachment D, a $9,166 difference); both are addressed below.

For initiatives with an absolute percent difference greater than 10%, the IE elaborates findings below; for all others, the IE refers the reader to Table 6. Per-initiative risk-reduction outcomes are recorded in the "Satisfied Risk Reduction Goal?" column of Table 6; the findings below comment qualitatively and refer the reader to that column rather than restating its values.

GD_1 – 8.1.2.1 Covered Conductor Replacement Project

Strategic Overview and Risk Mitigation – Replacement of bare distribution conductor with covered conductor on the highest-risk circuits to reduce ignition potential; BVES purposely accelerated 2025 scope beyond the annual target under board authorization.

Financial Performance Analysis

- **Planned Spend:** $1,840.6K
- **Actual Expenditure:** $5,572.7K
- **Variance:** +$3,732.1K (+202.8% overspend)
- **Driver:** deliberate scope acceleration (board/UWC-authorized, April 2025).
- **BVES Justification:** System conditions permitted additional covered-conductor work, performed with capital-governance approval.

Operational Impact and Risk Reduction – The acceleration advanced risk reduction ahead of plan, against a 3.62% risk-reduction goal; funding enabled, not constrained, progression, with the outcome reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Board-authorized scope acceleration, not uncontrolled cost growth. Reconciliation item: reconcile the residual actual-spend and mileage difference between the AIR figure and the DR004 unit-cost basis.

Additional comments: AIR Attachment D reports the filed actual at $5,572.7K against 7.73 circuit miles. BVES_DR004 Item 1 provides a different basis of $5,525.7K against 7.79 circuit miles, a residual difference of approximately $47.0K and 0.06 circuit miles. The IE uses the AIR Attachment D figure as the filed value; the controlling actual-spend and mileage basis is held pending backup validation. The board/UWC capital authorization is confirmed; the actual-and-mileage reconciliation remains open and is carried as a reportable item to the Executive Summary

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GD_2 – 8.1.2.1 Radford Line Replacement Project

This $0-budget initiative reflects $117.1K of prior-year (November 2024) work invoiced in 2025 (reported +100%). As a prior-year carryover against a $0 budget, it is excluded from the >10% count; please refer to Table 6.

GD_3 – 8.1.2.2 Minor Undergrounding Upgrades Projects

Strategic Overview and Risk Mitigation – Minor undergrounding relocates select overhead facilities underground; volume is driven by customer and local-government requests rather than a fixed BVES target.

Financial Performance Analysis

- **Planned Spend:** $301.2K
- **Actual Expenditure:** $172.6K
- **Variance:** −$128.6K (−42.7% underspend)
- **Driver:** demand-driven volume – customer- and local-government-driven undergrounding below forecast.
- **BVES Justification:** BVES states 2025 undergrounding demand was lower than budgeted and that these projects vary widely year to year.

Operational Impact and Risk Reduction – The underspend reflects demand volume rather than deferred risk work, with BVES reporting the initiative on track and the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The underspend is consistent with the demand-driven nature of the initiative and does not indicate a funding-adequacy or implementation concern.

GD_4 – 8.1.2.3 Covered Conductor Distribution Pole Replacements and Reinforcements

Strategic Overview and Risk Mitigation – Replacement and reinforcement of distribution poles supporting the covered-conductor program; the 2025 target was 100 poles.

Financial Performance Analysis

- **Planned Spend:** $788.8K
- **Actual Expenditure:** $2,388.3K
- **Variance:** +$1,599.5K (+202.8% overspend)
- **Driver:** deliberate scope acceleration under the board authorization shared with GD_1.
- **BVES Justification:** BVES completed 123 poles against the 100-pole target under the April 2025 UWC authorization.

Operational Impact and Risk Reduction – The target was exceeded (123 of 100 poles); funding enabled rather than constrained progression, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Board-authorized scope acceleration, not uncontrolled cost growth; the GD_1/GD_4 shared authorization and the fire-wrap cost allocation across GD_6/GD_4/GD_19.

GD_5 – 8.1.2.3 Radford Line Replacement (Pole Component)

This $0-budget initiative reflects $50.2K of prior-year (2024) work invoiced in 2025 (reported +100%). As a prior-year carryover against a $0 budget, it is excluded from the >10% count; please refer to Table 6.

GD_6 – 8.1.2.3 Evacuation Route Hardening Project

Strategic Overview and Risk Mitigation – Hardening of designated evacuation-route circuits, including fire-wrap protection, to maintain egress reliability during wildfire conditions.

Financial Performance Analysis

- **Planned Spend:** $794.1K
- **Actual Expenditure:** $540.4K
- **Variance:** −$253.7K (−31.9% underspend)
- **Driver:** cost-allocation convention – new-install fire-wrap cost is captured under GD_4/GD_19 rather than here.
- **BVES Justification:** BVES states the 2025 scope target was exceeded (851 poles against 500), with new-install wrap cost booked to the related hardening initiatives.

Operational Impact and Risk Reduction – The 2025 target was exceeded and the underspend reflects where fire-wrap cost was booked rather than under-execution, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The underspend reflects a cost-allocation convention across GD_6/GD_4/GD_19, not under-execution.

GD_7 – 8.1.2.4 Transmission Pole/Tower Replacements and Reinforcements

Not applicable – BVES does not own or operate transmission assets; no 2025 activity. Please refer to Table 6.

GD_8 – 8.1.2.5 Traditional Overhead Hardening

Strategic Overview and Risk Mitigation – Conventional overhead hardening (pole and equipment replacement) on distribution circuits to reduce equipment-related ignition risk.

Financial Performance Analysis

- **Planned Spend:** $803.3K
- **Actual Expenditure:** $1,011.5K
- **Variance:** +$208.2K (+25.9% overspend)
- **Driver:** expanded scope – additional proactive non-exempt arrester and splice replacement.
- **BVES Justification:** BVES states additional in-scope hardening work was performed within the program, which BVES_DR004 Item 6 attributes to planned replacement of non-exempt surge arresters under ACI Issue BVES-23-14, with associated splice replacement on the same pole.

Operational Impact and Risk Reduction – The target was met and the additional work advanced risk reduction; funding did not constrain implementation, with the outcome reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The overspend reflects expanded in-scope work and does not indicate a funding-adequacy concern.

GD_9 – 8.1.2.6 Emerging Grid Hardening Technology Installations and Pilots

Not applicable – BVES reports no pilot projects or programs for 2025; no activity. Please refer to Table 6.

GD_10 – 8.1.2.7 Bear Valley Solar Energy Project

Strategic Overview and Risk Mitigation – Utility-scale solar generation supporting microgrid resilience; execution depended on CPUC approval.

Financial Performance Analysis

- **Planned Spend:** $13,578.4K
- **Actual Expenditure:** $702.2K
- **Variance:** −$12,876.2K (−94.8% underspend)
- **Driver:** regulatory-timing deferral – CPUC approval did not occur until December 18, 2025.
- **BVES Justification:** BVES states the project was deferred pending CPUC approval and is carried into the 2026–2028 WMP.

Operational Impact and Risk Reduction – The deferral is a schedule effect outside BVES's control rather than reduced 2025 mitigation; the project carries forward, with risk-reduction status reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The underspend is a regulatory-timing deferral, not a funding-adequacy or implementation shortfall; the category-level effect is addressed in the synthesis.

GD_11 – 8.1.2.7 Energy Storage Project

Strategic Overview and Risk Mitigation – Battery energy storage paired with the microgrid program; execution depended on the same CPUC approval as GD_10.

Financial Performance Analysis

- **Planned Spend:** $10,342.0K
- **Actual Expenditure:** $32.5K
- **Variance:** −$10,309.5K (−99.7% underspend)
- **Driver:** regulatory-timing deferral identical to GD_10.
- **BVES Justification:** BVES states the project was deferred pending the December 18, 2025 CPUC approval and is carried into the 2026–2028 WMP.

Operational Impact and Risk Reduction – As with GD_10, the deferral is a schedule effect rather than reduced 2025 mitigation; the project carries forward, with risk-reduction status reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The underspend is a regulatory-timing deferral, not a funding-adequacy or implementation shortfall.

GD_12 – 8.1.2.8 Substation Automation

Strategic Overview and Risk Mitigation – Automation of substation devices to enable remote operation and faster fault isolation; the 2025 target was three substations automated and connected to SCADA. Two of those substations (Summit and Maltby) had their automation cost booked to substation-rebuild budgets rather than to GD_12, which is the basis of the underspend.

Financial Performance Analysis

- **Planned Spend:** $640.2K
- **Actual Expenditure:** $364.4K
- **Variance:** −$275.8K (−43.1% underspend)
- **Driver:** cost-allocation outcome – automation cost for two substations was booked to substation-rebuild budgets (Summit, no WMP ID, and Maltby under GD_22) rather than to GD_12.
- **BVES Justification:** BVES states the automation target was met with cost recorded under the related rebuild budgets.

Operational Impact and Risk Reduction – The automation target was met; the underspend reflects where cost was booked rather than unperformed scope, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The underspend reflects a cost-allocation convention rather than reduced scope. Reconciliation item: the IE recommends BVES confirm the rebuild work orders so the automation cost is counted once.

GD_13 – 8.1.2.8 Switch and Field Device Automation

Strategic Overview and Risk Mitigation – Installation of automated switches and field devices (including SCADA connectivity) to improve sectionalizing and reduce outage and ignition exposure.

Financial Performance Analysis

- **Planned Spend:** $640.2K
- **Actual Expenditure:** $1,370.6K
- **Variance:** +$730.4K (+114.1% overspend)
- **Driver:** CAPEX cost growth – higher equipment cost, additional SCADA-connectivity labor, and an unbudgeted third-party quality-control step.
- **BVES Justification:** BVES states the automation target was met at a higher equipment-and-labor cost than estimated.

Operational Impact and Risk Reduction – The target was met; the overspend reflects equipment, labor, and QC cost on completed scope, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The overspend reflects cost on completed automation scope and does not indicate a funding-adequacy concern. The IE examined Invoice 37107 ($49.6K) and confirms the third-party quality-control line at approximately 3.6% of actual, consistent with BVES_DR004 Item 4. The equipment and labor composition (approximately 53.5% equipment, 21.9% labor) remains a BVES-provided estimate, as BVES_DR004 Item 4 states BVES does not track variance at the initiative level.

GD_14 – 8.1.2.8 Capacitor Bank Upgrade Project

Strategic Overview and Risk Mitigation – Upgrade of distribution capacitor banks, with related automation, to support voltage stability and grid performance.

Financial Performance Analysis

- **Planned Spend:** $311.5K
- **Actual Expenditure:** $594.1K
- **Variance:** +$282.6K (+90.7% overspend)
- **Driver:** CAPEX cost growth – the same drivers as GD_13 (equipment, SCADA-connectivity labor, third-party QC).
- **BVES Justification:** BVES states the target was met at a higher equipment-and-labor cost than estimated.

Operational Impact and Risk Reduction – The target was met and the overspend reflects equipment and labor cost on completed scope, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The overspend reflects cost on completed scope and does not indicate a funding-adequacy concern. Reconciliation item: the IE recommends BVES confirm the GD_13/GD_14 split of the shared invoice and its 2024-versus-2025 booking year.

GD_15 – 8.1.2.8 Fuse TripSaver Automation

Strategic Overview and Risk Mitigation – Installation of TripSaver fuse-automation devices to reduce sustained outages and fault exposure; the 2025 target was 50 units.

Financial Performance Analysis

- **Planned Spend:** $133.6K
- **Actual Expenditure:** $400.4K

- **Variance:** +$266.8K (+199.7% overspend)
- **Driver:** CAPEX cost growth – communications equipment and SCADA-connectivity labor (labor-led).
- **BVES Justification:** BVES installed 73 units against the 50-unit target at a labor-weighted cost above estimate.

Operational Impact and Risk Reduction – The unit target was exceeded (73 of 50); funding enabled rather than constrained progression, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The overspend reflects a labor-led automation cost profile on an exceeded unit scope. BVES_DR004 Item 4 reports no third-party quality-control allocation for GD_15 (approximately 4.5% equipment, 82.3% labor, 0% QC); the third-party QC invoice previously associated with this initiative was confirmed to belong to GD_13.

GD_16 – 8.1.2.8 Server Room

This $0-budget initiative reflects $42.6K of prior-year (2023–2024) work invoiced in 2025 (reported +100%); the 2023–2025 lifecycle total is within approximately 1% of the WMP forecast. As a prior-year carryover against a $0 budget, it is excluded from the >10% count; please refer to Table 6.

GD_17 – 8.1.2.8 Distribution Management Center

This $0-budget initiative reflects $11.9K of prior-year (2024) work invoiced in 2025 (reported +100%); the IE carries a lifecycle-cost observation to the synthesis. As a prior-year carryover against a $0 budget, it is excluded from the >10% count; please refer to Table 6.

GD_18 – 8.1.2.9 Line Removals (in HFTD)

Not applicable – BVES reports no line-removal scope; no 2025 activity. Please refer to Table 6.

GD_19 – 8.1.2.10 Tree Attachment Removal Project

Strategic Overview and Risk Mitigation – Removal of tree attachments from distribution facilities to reduce vegetation-contact ignition risk. The 2025 target was 100 tree attachments; BVES reported removing 110 attachments.

Financial Performance Analysis

- **Planned Spend:** $592.7K
- **Actual Expenditure:** $861.9K
- **Variance:** +$269.2K (+45.4% overspend)
- **Driver:** cost escalation and cross-allocation – material/labor escalation plus new-install fire-wrap cost captured here rather than under GD_6.
- **BVES Justification:** BVES cites material and labor escalation and 6–9 month ordering lead times, with new-install fire wrap booked to this initiative.

Operational Impact and Risk Reduction – The target was met and the spend supported completed scope plus cross-allocated fire-wrap cost, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The overspend reflects cost escalation and cross-allocation rather than scope shortfall; the fire-wrap allocation across GD_6/GD_4/GD_19 is a transparency item carried to the Executive Summary.

GD_20 – 8.1.2.11 Other Grid Topology Improvements

Serves as a header for GD_14/GD_21; no standalone 2025 activity. Please refer to Table 6.

GD_21 – 8.1.2.12 BVPP Phase 4 Upgrade Project

This $0-budget initiative reflects $79.5K of prior-year (2024) work invoiced in 2025 (reported +100%); the IE carries a lifecycle-cost observation to the synthesis. As a prior-year carryover against a $0 budget, it is excluded from the >10% count; please refer to Table 6.

GD_22 – 8.1.2.12 Partial Safety and Technical Upgrades to Maltby Substation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 6.

GD_23 – 8.1.2.12 Safety and Technical Upgrades to Lake Substation

Reporting Completeness – AIR Attachment D omits this Focus initiative despite $1,374.5k of 2025 spend reported in BVES_DR001 and confirmed in BVES_DR004 Item 10 and BVES_DR004.b as a clerical reporting error. The IE carries the 2025 EC AIR errata adding GD_23 with its planned amount, 2025 actual, and variance driver as a reportable item to the Executive Summary.

GD_24 – 8.1.2.12 Safety and Technical Upgrades to Village Substation

BVES_DR004 Item 10 confirms no 2025 spend; no funding finding required. Please refer to Table 6.

GD_25 – 8.1.3.1 Detailed Inspection Program

Strategic Overview and Risk Mitigation – Detailed asset inspections across the territory to identify wildfire-risk conditions; the 2025 target was 53 circuit miles.

Financial Performance Analysis

- **Planned Spend:** $14.3K
- **Actual Expenditure:** $31.3K
- **Variance:** +$17.0K (+118.9% overspend)
- **Driver:** small-base OPEX overspend – additional internal inspection labor at an increased BVES rate.
- **BVES Justification:** BVES states inspection labor hours exceeded the small forecast while the 53-circuit-mile target was achieved.

Operational Impact and Risk Reduction – BVES reported completion of the 53-circuit-mile target. The implementation review did not validate this initiative; the validation status is reflected in the Initiative Summary Table, against a 4.36% risk-reduction goal. The funding variance reflects small-base labor forecasting rather than an identified funding shortfall and does not itself indicate a funding-adequacy concern.

Assessment and Conclusion – Small-base OPEX overspend with the target achieved; no funding-adequacy or implementation concern.

GD_26 – 8.1.3.2 Patrol Inspection Program

Strategic Overview and Risk Mitigation – Routine patrol inspections across the territory; the 2025 target was 205 circuit miles.

Financial Performance Analysis

- **Planned Spend:** $33.4K
- **Actual Expenditure:** $73.0K
- **Variance:** +$39.6K (+118.6% overspend)
- **Driver:** small-base OPEX overspend – additional internal patrol labor at an increased BVES rate.
- **BVES Justification:** BVES states patrol labor hours exceeded the small forecast while the target was achieved.

Operational Impact and Risk Reduction – The target was met; the variance reflects labor-hour forecasting on a small base, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Small-base OPEX overspend with the target achieved; no funding-adequacy or implementation concern.

GD_27 – 8.1.3.3 UAV Thermography

Strategic Overview and Risk Mitigation – Unmanned-aerial thermographic inspection of assets to detect thermal anomalies, performed under a contracted inspection engagement.

Financial Performance Analysis

- **Planned Spend:** $74.1K
- **Actual Expenditure:** $61.3K
- **Variance:** −$12.8K (−17.3% underspend)
- **Driver:** contractor-procurement underspend on a paired UAV inspection scope.
- **BVES Justification:** BVES states the work was contracted below forecast with the inspection target achieved.

Operational Impact and Risk Reduction – The target was met at a lower contracted cost; funding did not constrain implementation, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Favorable contractor procurement on completed scope; no funding-adequacy or implementation concern.

GD_28 – 8.1.3.4 UAV HD Photography/Videography

Strategic Overview and Risk Mitigation – Unmanned-aerial high-definition photography and videography of assets for inspection; the engagement is shared with VM_3.

Financial Performance Analysis

- **Planned Spend:** $74.1K
- **Actual Expenditure:** $59.5K
- **Variance:** −$14.6K (−19.7% underspend)
- **Driver:** contractor-procurement underspend on a paired UAV scope.
- **BVES Justification:** BVES states the work was contracted below forecast with the target achieved under the engagement shared with VM_3.

Operational Impact and Risk Reduction – The target was met at a lower contracted cost; funding did not constrain implementation, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Favorable contractor procurement on a shared scope; no funding-adequacy concern. The shared GD_28/VM_3 engagement is addressed in the synthesis.

GD_29 – 8.1.3.5 LiDAR Inspection

Strategic Overview and Risk Mitigation – LiDAR-based inspection of distribution facilities, performed under a contracted engagement paired 50/50 with VM_4.

Financial Performance Analysis

- **Planned Spend:** $85.4K
- **Actual Expenditure:** $76.2K (as filed)
- **Variance:** −$9.2K (−10.8% as filed)
- **Driver:** AIR reporting/reconciliation – AIR Attachment D labels the variance "less than 10%" and reports the actual at $76,200, while BVES_DR001 reports $85,366 (a $9,166 difference).
- **BVES Justification:** BVES's standalone cost report supports a corrected actual of $85,366, which brings the variance to under 1%.

Operational Impact and Risk Reduction – The inspection target was met; the variance is a reporting artifact rather than reduced scope, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The IE examined the Davey LiDAR invoices (total $170.7K, split 50/50 at $85.4K per side) and confirms the corrected 2025 actual of $85.4K; the AIR figure of $76.2K is understated by $9.2K. The IE carries the AIR errata (correct $76.2K to $85.4K) as a reportable item to the Executive Summary.

GD_30 – 8.1.3.6 3rd Party Ground Patrol

Strategic Overview and Risk Mitigation – Contracted third-party ground patrol of distribution facilities, paired 50/50 with VM_5.

Financial Performance Analysis

- **Planned Spend:** $61.5K
- **Actual Expenditure:** $16.4K
- **Variance:** −$45.1K (−73.3% underspend)

- **Driver:** favorable contractor procurement – lower contracted cost on completed scope.
- **BVES Justification:** BVES states the patrol scope was completed at a lower contracted cost under the shared VM_5 engagement.

Operational Impact and Risk Reduction – The target was met at a lower contracted cost; funding did not constrain implementation, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Favorable procurement on a shared scope; no funding-adequacy concern. Reconciliation item: the IE recommends BVES reconcile the 50/50 split to the AIR actual and confirm a 2024 ground-patrol invoice paid in 2025.

GD_31 – 8.1.3.7 Intrusive Pole Inspections

Strategic Overview and Risk Mitigation – Intrusive (below-grade) pole inspections to assess pole integrity, performed under a contracted inspection budget.

Financial Performance Analysis

- **Planned Spend:** $19.7K
- **Actual Expenditure:** $38.4K
- **Variance:** +$18.7K (+94.9% overspend)
- **Driver:** contractor rate increase on a small-base inspection budget.
- **BVES Justification:** BVES states a higher contracted rate on completed scope with the target achieved.

Operational Impact and Risk Reduction – The target was met; the overspend reflects a contractor rate increase on a small base, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Contractor-rate overspend on completed scope; no funding-adequacy or implementation concern.

GD_32 – 8.1.3.8 Substation Inspections

Strategic Overview and Risk Mitigation – Substation inspections including contracted equipment testing; the 2025 target was 144 substations on a monthly cadence.

Financial Performance Analysis

- **Planned Spend:** $291.7K
- **Actual Expenditure:** $335.2K
- **Variance:** +$43.5K (+14.9% overspend)
- **Driver:** cost growth – additional inspection labor and a higher contracted equipment-testing cost.
- **BVES Justification:** BVES states more labor hours and a higher contracted testing cost while the annual target was exceeded (156 of 144).

Operational Impact and Risk Reduction – The target was exceeded (156 of 144); the overspend reflects labor and contracted-testing cost, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Overspend on completed scope; no funding-adequacy concern. The IE notes one February substation-inspection record not reflected in the documentation provided is an operational-completeness item outside funding scope.

GD_33 – 8.1.4 Equipment Maintenance and Repair

Strategic Overview and Risk Mitigation – As-needed equipment maintenance and repair responding to inspection findings and storm damage.

Financial Performance Analysis

- **Planned Spend:** $1,105.4K
- **Actual Expenditure:** $1,352.2K
- **Variance:** +$246.8K (+22.3% overspend)
- **Driver:** demand-driven volume – storm- and inspection-driven maintenance above forecast.
- **BVES Justification:** BVES states higher labor hours from inspection-finding resolution and storm response (an approximate 61% routine / 39% storm-related split).

Operational Impact and Risk Reduction – The work was reported in progress and the overspend reflects responsive maintenance volume, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Demand-driven overspend; no funding-adequacy concern. The approximately 61% routine / 39% storm split is reported per BVES_DR004 Item 8; the underlying maintenance records were not in the validated set, so this figure rests on the BVES response pending backup validation.

GD_34 – 8.1.5 Asset Management and Inspection Enterprise System

Strategic Overview and Risk Mitigation – Maintenance and update of the enterprise asset-management and inspection system supporting the WMP.

Financial Performance Analysis

- **Planned Spend:** $59.4K
- **Actual Expenditure:** $46.0K
- **Variance:** −$13.4K (−22.6% underspend)
- **Driver:** enterprise-system maintenance labor cost below forecast.
- **BVES Justification:** BVES states lower-than-estimated labor cost to update and maintain the system.

Operational Impact and Risk Reduction – The system was maintained with no scope shortfall, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The underspend does not indicate a funding-adequacy concern. Recommendation: the IE recommends BVES document the WMP-versus-base allocation basis for enterprise software (a recurring item with VM_15 and VM_19; carried to the Executive Summary).

GD_35 – 8.1.6 Asset Quality Assurance / Quality Control

Strategic Overview and Risk Mitigation – Quality assurance and quality control over asset inspection and maintenance records; the 2025 target was 20 asset QCs.

Financial Performance Analysis

- **Planned Spend:** $20.9K
- **Actual Expenditure:** $27.6K
- **Variance:** +$6.7K (+32.1% overspend)
- **Driver:** small-base OPEX overspend – additional internal QA/QC labor.
- **BVES Justification:** BVES states more QA/QC labor than estimated with the 20-QC target achieved.

Operational Impact and Risk Reduction – The 20-QC target was met; the variance is a small-base labor effect, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Small-base OPEX overspend with the target achieved; no funding-adequacy or implementation concern.

GD_36 – 8.1.7 Open Work Orders

Strategic Overview and Risk Mitigation – Resolution of open asset work orders within GO 95 timeframes.

Financial Performance Analysis

- **Planned Spend:** $18.3K
- **Actual Expenditure:** $24.2K
- **Variance:** +$5.9K (+32.2% overspend)
- **Driver:** small-base OPEX overspend – additional internal labor.
- **BVES Justification:** BVES states additional hours to resolve open work orders.

Operational Impact and Risk Reduction – BVES reported additional labor associated with open-work-order management. The implementation review did not validate this initiative; the validation status is reflected in the Initiative Summary Table. BVES did not provide a risk-reduction goal for this initiative. The funding variance reflects a small-base labor effect and does not itself indicate a funding-adequacy concern.

Assessment and Conclusion – Small-base OPEX overspend with the planned activities achieved; no funding-adequacy or implementation concern.

GD_37 – 8.1.8.1 Equipment Settings to Reduce Wildfire Risk

Strategic Overview and Risk Mitigation – Annual review and update of protective equipment settings to reduce wildfire risk.

Financial Performance Analysis

- **Planned Spend:** $5.2K
- **Actual Expenditure:** $6.9K
- **Variance:** +$1.7K (+32.7% overspend)
- **Driver:** small-base OPEX overspend – additional internal labor.

- **BVES Justification:** BVES states additional annual review-and-update hours.

Operational Impact and Risk Reduction – The planned activities were completed; the variance is a small-base labor effect, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Small-base OPEX overspend with the planned activities achieved; no funding-adequacy or implementation concern.

GD_38 – 8.1.8.2 Grid Response Procedures and Notifications

Strategic Overview and Risk Mitigation – Annual review and maintenance of grid-response procedures and notification protocols.

Financial Performance Analysis

- **Planned Spend:** $9.2K
- **Actual Expenditure:** $12.1K
- **Variance:** +$2.9K (+31.5% overspend)
- **Driver:** small-base OPEX overspend – additional internal labor.
- **BVES Justification:** BVES states additional annual review-and-update hours.

Operational Impact and Risk Reduction – The planned activities were completed; the variance is a small-base labor effect, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Small-base OPEX overspend with the planned activities achieved; no funding-adequacy or implementation concern.

GD_39 – 8.1.8.3 Personnel Work Procedures and Training in Conditions of Elevated Fire Risk

Strategic Overview and Risk Mitigation – Annual update of personnel work procedures and training for conditions of elevated fire risk.

Financial Performance Analysis

- **Planned Spend:** $3.9K
- **Actual Expenditure:** $5.2K
- **Variance:** +$1.3K (+33.3% overspend)
- **Driver:** small-base OPEX overspend – additional internal labor.
- **BVES Justification:** BVES states additional annual procedure-and-training update hours.

Operational Impact and Risk Reduction – The planned activities were completed; the variance is a small-base labor effect, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Small-base OPEX overspend with the planned activities achieved; no funding-adequacy or implementation concern.

GD_40 – 8.1.9 Asset Workforce Planning

Strategic Overview and Risk Mitigation – Workforce-planning review supporting the asset-management and inspection programs.

Financial Performance Analysis

- **Planned Spend:** $6.5K
- **Actual Expenditure:** $8.6K
- **Variance:** +$2.1K (+32.3% overspend)
- **Driver:** small-base OPEX overspend – additional internal labor.
- **BVES Justification:** BVES states additional workforce-planning review hours.

Operational Impact and Risk Reduction – The planned activities were completed; the variance is a small-base labor effect, with the targeted risk reduction reflected in Table 6's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Small-base OPEX overspend with the planned activities achieved; no funding-adequacy or implementation concern.

4.1.3 Synthesis of Findings

4.1.3.1 Initiative Review

Across the Grid Design, Operations, and Maintenance category, BVES demonstrated strong overall performance in 2025, meeting or exceeding targets in 29 of 37 initiatives reviewed. The utility achieved notable successes in grid hardening activities, with covered conductor installation reaching 152% of target (7.73 circuit miles against a 5.10-mile goal), distribution pole replacements at 122% (123 poles against a 100-pole target), and evacuation route hardening at 168% (851 poles against a 500-pole target). Automation and SCADA integration initiatives met their targets, with substation automation (3 of 3 substations), switch automation (11 of 11 devices), capacitor bank upgrades (6 of 6 banks), and TripSaver installations (49 of 50 units, 98% achievement) all validated. However, the category experienced significant shortfalls in two areas. The Bear Valley Solar Energy Project and Energy Storage Project both failed to achieve their 100% project completion targets, with completion now deferred to 2027 despite obtaining CPUC approval in December 2025. Additionally, inspection programs revealed data management challenges, with the Detailed Inspection Program falling 4 circuit miles short of its 53-mile target (92% achievement) and LiDAR Inspections missing 18 circuit miles of its 205-mile target (91% achievement), both falling below the 95% validation threshold. The most common reasons for missing targets were project permitting delays and regulatory approval timelines (affecting the solar and energy storage initiatives), data reconciliation issues between field records and GIS databases (affecting multiple inspection and hardening initiatives), and site access constraints that prevented complete field verification in several programs.

The IE's field verification process identified a pattern of minor but persistent data accuracy issues across multiple initiatives, including mismatched pole identification numbers between GIS exports and field assets, GPS coordinate discrepancies that complicated field location efforts, and inconsistencies between as-built drawing dates and reported completion timelines. While these data management issues did not prevent validation of most initiatives, as field observations consistently confirmed that physical work had been completed as claimed, they represent a recordkeeping challenge that undermines audit efficiency and operational reliability. For example, in the Distribution Pole Replacement initiative (GD_4), one sampled location showed a pole that

had not been replaced despite appearing in completion records, and in the Switch Automation initiative (GD_13), two devices could not be located at reported GPS coordinates. The Tree Attachment Removal initiative (GD_19) exemplified these challenges, with three poles showing correct work but incorrect structure IDs, two locations inaccessible due to private property constraints, and two locations appearing as duplicate entries with conflicting coordinates. BVES should implement standardized data validation protocols at the point of work completion, including mandatory field verification of pole tag numbers and GPS coordinates before records are submitted to the GIS database, and establish a formal reconciliation process between ResourceKeeper, GIS exports, and as-built documentation to ensure consistency across all data systems.

4.1.3.2 Funding Verification

Budget and Expenditure Summary

The Grid Design, Operations, and Maintenance category had a total 2025 planned budget of $34,427.1 thousand against actual expenditures of $18,383.6 thousand, a 46.6% variance below budget.

This category-level figure is distorted by two regulatory-timing deferrals: excluding GD_10 Bear Valley Solar (−$12,876.2 thousand) and GD_11 Energy Storage (−$10,309.5 thousand), both deferred pending the December 18, 2025 CPUC approval and carried into the 2026–2028 WMP, the remaining initiatives spent $17,648.9 thousand against $10,506.7 thousand planned – a 68.0% variance above budget.

GD_23 Lake Substation adds a further $1,374,524 of 2025 spend not reflected in 2025 EC AIR Attachment D. The category figures are the arithmetic sum of the initiative-level amounts filed in 2025 EC AIR Attachment D; GD_23 is per BVES_DR001 and BVES_DR004.b.

Initiatives with Significant Variances

Of the 38 GD-category initiatives reported in 2025 EC AIR Attachment D, 28 exceeded ±10% as filed. Applying the count method in the standard – which excludes the five $0-budget prior-year carryover items (GD_2, GD_5, GD_16, GD_17, GD_21) and the four not-applicable items (GD_7, GD_9, GD_18, GD_20) – Of the 29 in-scope GD initiatives, 27 (93.1%) had absolute percent differences exceeding 10% after the GD_29 correction (28, or 96.6%, as filed); GD_22 (+6.7%) is the sole in-scope exception.

The most common reasons for variances included:

- Regulatory-timing deferral of the GD_10 and GD_11 generation projects pending CPUC approval – the largest single source of category variance.
- Board-approved scope acceleration on the covered-conductor program (GD_1 at +202.8% and GD_4 at +202.8%), funded through the cited April 2025 UWC authorization.
- Cost-allocation between paired initiatives – evacuation-route fire wrap charged to GD_4/GD_19 rather than GD_6 (−31.9%), and substation automation charged to rebuild budgets rather than GD_12 (−43.1%).
- Higher equipment cost, SCADA-connectivity labor, and third-party QC on the automation initiatives (GD_13 at +114.1%, GD_14 at +90.7%, GD_15 at +199.7%).

- Prior-year carryover accrual on $0-budget initiatives (GD_2, GD_5, GD_16, GD_17, GD_21), and a cluster of small-base OPEX overspends across the inspection, maintenance, and procedural line items (GD_25 through GD_40) where targets were met or exceeded but actuals exceeded small forecasts on additional internal labor.

Key Trends and Funding Compliance

- The category is concentrated in a small number of large CAPEX projects; two were deliberately accelerated above plan (GD_1, GD_4) and two large microgrid projects were deferred pending CPUC approval (GD_10, GD_11), so the headline category variance reflects timing and governance decisions rather than execution gaps.
- A recurring small-base OPEX overspend pattern runs through the inspection, maintenance, and procedural initiatives (GD_25, GD_26, GD_31–GD_40): targets were met or exceeded, but actuals exceeded small forecasts on additional internal labor at an increased BVES rate. BVES committed in BVES_DR004 Item 11 to evaluate its 2026–2028 forecasting methodology.
- Several variances are cost-allocation conventions rather than performance effects – fire wrap across GD_6/GD_4/GD_19 and substation automation across GD_12/GD_22 – which the IE recommends BVES describe transparently in the 2026 AIR.
- Two reporting items require AIR errata: GD_23 (Lake Substation, $1,374,524 omitted from Attachment D) and GD_29 (LiDAR actual understated $9,166; correct $76,200 to $85,366).
- BVES does not track variance at the initiative level (BVES_DR004 Item 4); reported cost compositions are directional estimates. The IE accepts this as a 2025 limitation and recommends initiative-level variance tracking for 2026–2028.

Funding Verification – IE Assessment.

The IE finds Grid Design funding broadly adequate to delivered scope. The variances are explained predominantly by regulatory-timing deferral, board-authorized scope acceleration, cost-allocation conventions, CAPEX cost growth on completed automation work, and small-base labor effects; not by funding shortfalls, and the targeted risk reduction is reflected in Table 6's "Satisfied Risk Reduction Goal?" column. Implementation-validation conflicts are addressed in the Initiative Summary Table and should not be inferred from funding adequacy.

The reportable items the IE carries to the Executive Summary are the two 2025 EC AIR errata (GD_23, GD_29), the enterprise-software/SaaS WMP-versus-base allocation methodology (GD_34), the fire-wrap cost-allocation transparency item (GD_6/GD_4/GD_19), the accrual-cut for prior-year services paid in 2025 (Radford GD_2/GD_5; the misfiled 2024 ground-patrol invoice under GD_30), and the recommendation for initiative-level variance tracking for 2026–2028.

4.2 VEGETATION MANAGEMENT AND INSPECTIONS

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.2.1 Initiative Summary Table

Table 44: Initiative Summary Table (Spend in Thousand $)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[15]	Sample Validation Rate (%)[16, 17]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[18, 19, 20]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
VM_1, 8.2.2.1, Detailed Inspections	53 Circuit Miles	53 Circuit Miles	Completed	128 Asset Points[21]	100%	Detailed Inspections List 128 Inspection Records (Frontload Data) Circuit Mileage by Circuit (DR002)	92%[22]	$14.30	$31.30 (118.9%)	No (4.36%)
VM_2, 8.2.2.1, Patrol Inspections	205 Circuit Miles	205 Circuit Miles	Completed	19 Asset Points[21]	100%	Patrol Inspections List (Frontload Data) 22 Circuit Inspection Records (DR071) Circuit Mileage by Circuit (DR002)	100%	$33.40	$73 (118.6%)	Yes (4.36%)
VM_3, 8.2.2.1, UAV HD Photography/Videography	205 Circuit Miles	205 Circuit Miles	Completed	34 Asset Points[21]	100%	UAV and Thermal Inspection List 34 Inspection Records (Frontload Data) Circuit Mileage by Circuit (DR002)	100%	$74.10	$59.50 (-19.7%)	Yes (4.36%)
VM_4, 8.2.2.1, LiDAR Inspection	205 Circuit Miles	205 Circuit Miles	Completed	30 Asset Points[21]	100%	LiDAR Inspection List 30 Inspection Records (Frontload Data) Circuit Mileage by Circuit (DR002)	91%[23]	$76.20	$85.40 (12.1%)	No (4.36%)

[15] N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
[16] The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
[17] N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.
[18] The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.
[19] Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.
[20] Not Applicable in the “IE Findings on Initiative” column indicates that the IE determined the initiative to not be relevant for review for implementation year 2025. Refer to the initiative review under section 4.2.2.1 for more detail.
[21] The sampling Population is based on the total number of asset points provided by BVES rather than the target unit circuit mileage.
[22] Although all sampling data was validated, the data provided by BVES indicates a shortfall of four circuit miles resulting in a 92% initiative validation rate. (49 * 1 / 53 = .9245 * 100 = 92.45%) See Section 4.2.2.1, Initiative Review for VM_1.
[23] Although all sampling data was validated, the data provided by BVES indicates a shortfall of 18 circuit miles resulting in a 91% initiative validation rate. (187 * 1 / 205 = .9121 * 100 = 91.21%) See Section 4.2.2.1, Initiative Review for VM_4.

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[15]	Sample Validation Rate (%)[16, 17]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[18, 19, 20]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
VM_5, 8.2.2.1, 3rd Party Ground Patrol	205 Circuit Miles	205 Circuit Miles	Completed	34 Asset Points[2121]	100%	3rd Party Ground Patrol List 34 Inspection Records (Frontload Data) Circuit Mileage by Circuit (DR002)	100%	$61.50	$16.40 (-73.3%)	Yes (4.36%)
VM_6, 8.2.2.1, Substation inspections	144 Substations	156 Substations	Completed	28 Substations	100%	Substation Inspection List (Frontload Data) 30 Substation Inspection Records (DR075)	99%[24]	$4.50	$5.10 (13.3%)	Yes (4.35%)
VM_7, 8.2.3.1, Pole clearing	Review & Update	In Progress	Completed	N/A	N/A	BVES Vegetation Management Programs (DR076)	100%	$0	$0	No Goal Provided
VM_8, 8.2.3.2, Wood and slash management	Waste Removal Requirements Met	In Progress	In Progress	N/A	N/A	Vegetation Management Contract (Frontload Data)	100%	$507.20	$519.40 (2.4%)	Yes (3.62%)
VM_9, 8.2.3.3, Clearance	72 Circuit Miles	91 Circuit Miles	Completed	25 Circuit Miles	100%	Clearance Completed Inventory Completed Clearance Log VegClear .gdb (Frontload Data)	126%	$2,157.60	$2,205.30 (2.2%)	Yes (3.02%)
VM_10, 8.2.3.4, Fall-in Mitigation	88 Trees	164 Trees	Completed	29 Trees	100%	Field Inspections Tree Removal Locations (Frontload Data, DR061)	186%	$342.20	$350.80 (2.5%)	Yes (3.02%)
VM_11, 8.2.3.5, Substation Defensible Space	13 Substations	13 Substations	Completed	13 Substations	92%	Defensible Space Inspection List (Frontload Data) 11 Substation Inspection Records (DR062)	92%	$15.90	$9.70 (-39.0%)	No (3.02%)
VM_12, 8.2.3.6, High-risk Species	WMP Plan Review and Vegetation Discussion w/ Experts	BVES Exceeded its Annual Tree Removal/Remediation Target	In Progress	N/A	N/A	High-Risk Species Mitigation Inventory (Frontload Data)	100%	$342.20	$350.80 (2.5%)	Yes (3.02%)
VM_13, 8.2.3.7, Fire-Resilient Rights-of-way	WMP Plan Review and Vegetation Discussion w/ Experts	Objective considered accomplished. In 2025, BVES completed work on a high risk right-of-way that is located in the only HFTD tier 3 location in the territory.	In Progress	N/A	N/A	Rights-of-Way Inspection Record (Frontload Data)	Not Applicable	$14.90	$17.90 (20.1%)	N/A (4.51%)

[24] Data provided by BVES indicates that monthly inspections occurred at 12 substations, with only the February inspection at the Village substation not being performed, resulting in a total of 143 substation inspections for 2025, resulting in a 99% initiative validation rate. (143 * 1 / 144 = .9533 * 100 = 99.30%) See Section 4.2.2.1, Initiative Review for VM_6.

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[15]	Sample Validation Rate (%)[16, 17]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[18, 19, 20]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
VM_14, 8.2.3.8, Emergency Response Vegetation Management	Verification of Readiness and Review of Plan	In Progress	In Progress	N/A	N/A	BVES PSPS Procedures Rev. 3 PSPS Exercise Spreadsheet PSPS Post-Season Report 2025 (Frontload Data)	100%	$29.70	$37.70 (26.9%)	Yes (3.02%)
VM_15, 8.2.4, Vegetation Management Enterprise System	100% Ongoing Monitoring and Maintenance	This objective was completed in 2025.	In Progress	N/A	N/A	VM Contract VM Enterprise System ScrnSht (Frontload Data) Three VM Contract Extensions (DR066)	100%	$22.30	$19.70 (-11.7%)	Yes (3.02%)
VM_16, 8.2.5, Vegetation Management Quality assurance/Quality Control	72 Vegetation QCs	187 Vegetation QCs	Completed	29 Vegetation QCs	100%	Vegetation Management QC Log (Frontload Data) 29 Vegetation QC Records (DR067)	260%	$52.50	$68.80 (31.0%)	Yes (4.36%)
VM_17, 8.2.6, Vegetation Management Open Work Orders	All Work Orders Resolved Within GO95 Timeframe	In Progress	In Progress	N/A	N/A	2025 Vegetation Management Work Log (Frontload Data)	100%	$36.80	$46 (25.0%)	Yes (3.02%)
VM_18, 8.2.7, Vegetation Management Workforce planning	Staffing Levels Verified	In Progress	In Progress	N/A	N/A	Staffing Example (Week) Vegetation Management Contract Contractor Fully Executed Contract (Frontload Data)	100%	$6.50	$8.60 (32.3%)	Yes (3.62%)
VM_19 ,8.2.2.7, AiDash	Annual Review	In Progress	In Progress	N/A	N/A	N/A	Not Applicable	$40	$8.60 (-78.5%)	No Goal Provided

4.2.2 Written Detail for Initiatives

4.2.2.1 Initiative Review – Findings & Method

VM_1 – 8.2.2.1 Detailed Inspections – Focus and Non-Field Verifiable

The detailed inspection initiative involves completing careful visual and diagnostic exams of individual pieces of BVES equipment. These inspections are designed to identify any existing, including minor, defects and may include open wire secondary clearance, corona effect on cross-arms, warning signage issues, visibility strips and pole-tag issues, and rotten poles. The 2023-2025 WMP set a target to complete detailed inspections for 53 circuit miles in 2025, with an associated risk-reduction goal of 4.36%. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. According to its 2025 Q4 QDR, BVES completed detailed inspections for 53 circuit miles, meeting the target.

In support of Initiative VM_1, BVES was asked to provide a list of all completed vegetation inspections/detailed inspections which occurred during 2025 to include dates of completion, geographical area, issues identified, HFTD Tier Classification, and if an open work order was generated. The utility responded by submitting a list of 1,636 completed inspections which included Pole Details Circuit, Scope, Inspected Date, Pole ID, Substation, Feeder ID, Mapped City, name of inspector, and priority.

The IE reviewed a sample of 128 points of detailed inspections from Tier 2 – HFTD. The utility responded with a written response indicating that inspection reports generate in Excel format and no additional PDF reports exist. The IE reviewed the requested sampling data in the frontload spreadsheet and identified no discrepancies. The IE was able to cross-reference the point data to the "Circuit Mileage by Circuit" spreadsheet for the circuits shown; however, the circuit mileage totaled 49 circuit miles, not the 53 circuit miles claimed. Although all sampling data was validated, the total number of circuit miles based on the circuits listed in the frontload data spreadsheet led to a shortfall of 4 circuit miles from the target, resulting in an initiative validation rate of 92%, outside the threshold set forth by Energy Safety.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative.

Table 45: Detailed Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR061 Response	Initiative Validation Rate
53 Circuit Miles	53 Circuit Miles	53 Circuit Miles	1636 Points/ 128 Detailed Point Inspections = 49 Circuit Miles	92%

VM_2 – 8.2.2.1 Patrol Inspections – Focus and Non-Field Verifiable

The patrol inspections initiative requires an annual visual inspection of all overhead facilities designed to identify obvious problems, gross defects, and hazards. Gross defects may include cracked cross-arms, poles leaning beyond specification, guy wires missing or damaged, vegetation encroachment inside of minimum clearance standards, etc. The 2023-2025 WMP set a target to complete patrol inspections for 205 circuit miles in 2025, with an associated risk-reduction goal of 4.36%. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. According to its 2025 Q4 QDR, BVES completed patrol inspections for 205 circuit miles, meeting the target.

In support of Initiative VM_2, BVES was asked to provide a list of all completed vegetation inspections/patrol inspections which occurred during 2025 to include dates of completion, geographical area, issues identified, HFTD Tier Classification, and if an open work order was generated. The utility responded by submitting an Excel spreadsheet with a list of 22 circuits (Boulder, Castle Glen, Clubview, Country Club, Eagle, Erwin, Fox Farm, Garstin, Georgia, Goldmine, Harnish, Holcomb, Interlaken, Lagonita, Paradise, Pioneer, Pump House, North Shore, Radford, Shay, Sun Rise, and Sunset) showing completion dates between February and October 2025. Cross referencing the circuits listed in the frontload data with the Circuit Mileage by Circuit documentation provided by BVES, the IE verified that these circuits encompass all 205 circuit miles.

The IE reviewed sample patrol inspection reports for all 22 circuits which consisted of a one-page document showing the Circuit Name, Voltage, Inspection Type, Offcycle, Inspector, and inspection date. The IE did not find any discrepancies in any of the sampling data provided.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 46: Patrol Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR071 Response	Initiative Validation Rate
205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	100%

VM_3 – 8.2.2.1 UAV HD Photography/Videography – Non-Focus and Non-Field Verifiable

The UAV HD Photography/Videography inspections initiative is a high-definition (HD) imagery aerial survey of BVES's sub-transmission and distribution facilities and power lines designed to identify obvious programs, gross defects, and hazards. The 2023-2025 WMP set a target to complete patrol inspections for 205 circuit miles in 2025, with an associated risk-reduction goal of 4.36%. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. According to its 2025 Q4 QDR and 2025 AIR, BVES completed UAV HD photography/videography inspections for 205 circuit miles, meeting the target.

In support of Initiative VM_3, BVES was asked to provide a list of all completed UAV HD Photography/Videography inspections which occurred during 2025 to include dates of completion, geographical area, issues identified, HFTD Tier Classification, and if an open work order was generated. The utility responded by submitting a list of 6,613 completed inspections which included, but not limited to, Site ID, Actual Pole Number, various component identifiers/issues, Ground Visit Date, Photo Review, etc. Cross referencing the circuits listed in the frontload data with the Circuit Mileage by Circuit documentation provided by BVES, the IE verified that the listed circuits encompass all 205 circuit miles.

The IE reviewed a sample of 34 inspection reports of detailed inspections which consisted of 6 from Tier 2-HFTD and 28 from Tier 3-HFTD. The IE was given access to the ResourceKeeper records management system in order to validate each of the 34 inspection reports. The reports in the ResourceKeeper system directly aligned with the frontload data provided with the exception of the actual pole numbers (different in ResourceKeeper vs. frontload data) and pole tag photos (frontload data states "Pole Tag Photo" as "Yes" for all items but no tag photos were found in ResourceKeeper). BVES should ensure that pole numbers on the database export match the pole number listed on the ResourceKeeper database for accountability and auditing purposes.

Although there were two discrepancies between the frontload data and the data in ResourceKeeper, based on this analysis and the documentation provided, IE has validated this initiative.

Table 47: UAV HD Photography/Videography

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR072 Response	Initiative Validation Rate
205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	6,613 Points = 205 Circuit Miles/ ResourceKeeper	100%

VM_4 – 8.2.2.1 LiDAR Inspections – Non-Focus and Non-Field Verifiable

The LiDAR inspections initiative uses a system of lasers and software to develop surveys of the overhead systems to accurately determine vegetation clearances to conductors. The 2023-2025 WMP set a target to complete patrol inspections for 205 circuit miles in 2025, with an associated risk-reduction goal of 4.36%. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. According to its 2025 Q4 QDR, BVES completed UAV HD photography/videography inspections for 205 circuit miles, meeting the target.

In support of Initiative VM_4, BVES was asked to provide a list of all completed UAV HD Photography/Videography inspections which occurred during 2025 to include dates of completion, geographical area, issues identified, HFTD Tier Classification, and if an open work order was generated. The utility responded by submitting a list of 197 completed LiDAR inspections which included Date, Level, Clearance, Species, Location, Notes, Circuit, and Completed date from 18 circuits. The IE was able to cross-reference the point data to the "Circuit Mileage by Circuit"

spreadsheet for the circuits shown; however, the circuit mileage totaled 186.86 circuit miles, not the 205 circuit miles claimed with the Radford, Georgia, Pump House, and Sunset circuits not represented.

The IE reviewed a sample of 30 points of detailed inspections provided from 10 circuits in Tier 2-HFTD which consisted of a one-page document showing the Date, Level, Clearance, Species, Location, Notes, Circuit, Completion Date and High Fire Threat District. The IE did not find any discrepancies in any of the sampling data provided. Although all sampling data was validated, the total number of circuit miles based on the circuits listed in the frontload data spreadsheet led to a shortfall of ~18 circuit miles from the target, resulting in an initiative validation rate of 91%, outside the threshold set forth by Energy Safety.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative.

Table 48: LiDAR Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR073 Response	Initiative Validation Rate
205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	197 Points = 186.86 Circuit Miles 30 Points	91%

VM_5 – 8.2.2.1 – 3rd Party Ground Patrol – Non-Focus and Non-Field Verifiable

The 3rd Party Ground Patrol Inspections initiative is an enhanced inspection that serves as an additional annual GO 165 patrol inspection to the one performed by BVES's internal staff. BVES believes this additional patrol is warranted due to the local climate; likelihood of icing conditions; tree limbs and branches subject to weakening due to repeated high winds, snow, and ice weight; high elevation; other local conditions; difficulty accessing vegetation for trimming near bare conductors, species growth rates and characteristics; and the fact that the service area is designated "very dry" or "dry" approximately 80% of the time in the NFDRS. This environment, coupled with the fact that the fire season is now year-round, creates a high-risk condition that can be mitigated by increasing patrols. The WMP has a risk reduction goal of 4.36% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved.

The initiative target for 2025 was 205 circuit miles of ground patrol inspections. According to BVES's 2025 EC AIR, the utility completed 205 circuit miles of inspections, meeting the initiative target. BVES provided a 2025 3rd party data spreadsheet recording 6,692 overall vegetation inspections. The spreadsheet included inspection details such as pole numbers, circuit names, locations, and associated findings. A second tab labelled "Pole Violations", contained 19 records of findings such as excessive pole lean, split or decayed tops, and loose down guys. Cross referencing the circuits listed in the frontload data with the Circuit Mileage by Circuit

documentation provided by BVES, the IE verified that the listed circuits encompass all 205 circuit miles.

The IE requested 34 items of data to review and verify completeness for VM_5. BVES provided a written response stating that reports are generated directly into Excel format and no additional PDF reports are available. The IE reviewed the identified sampling items in the frontload data provided and identified no issues or discrepancies.

The IE identified no issues or discrepancies during this review. Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 49: 3rd Party Ground Patrol

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR074 Response	Initiative Validation Rate
205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	205 Circuit Miles	100%

VM_6 – 8.2.2.1 Substation Inspections – Non-Focus and Non-Field Verifiable

The Substation Inspections initiative involves monthly inspections of BVES's substations to mitigate the risk of equipment failures that could cause ignitions. The 2023-2025 WMP set a target to complete substation inspections for 144 substations in 2025, with an associated risk-reduction goal of 4.35%. In the 2025 EC AIR, BVES stated that the risk reduction was achieved. According to its 2025 Q4 QDR and 2025 AIR, BVES completed 156 substation inspections, exceeding the target.

In support of Initiative VM_6, BVES was asked to provide a list of all completed vegetation inspections/substation inspections which occurred during 2025 to include dates of completion, geographical area, issues identified, HFTD Tier Classification, and if an open work order was generated. The utility responded by submitting a list of 12 substations and provided dates for inspections completed each month (with the exception of the February inspection for Village Substation) totaling 143 inspections. The number of inspections provided does not match the number of inspections claimed by the utility in its 2025 Q4 QDR and 2025 AIR.

The IE reviewed a sample of 30 substation inspection reports from substations in Tier 2-HFTD. All inspection reports were noted to be thoroughly completed and noted any issues found, maintenance/abatement procedures completed, and if a station was inaccessible due to snow, mud, or other conditions. The IE did not find any discrepancies in any of the sample reports provided. The IE was unable to validate the 156 inspections claimed by BVES in the 2025 EC AIR. The frontload documentation detailed BVES completed 143 inspections, leading to a shortfall of 1 inspection from the target, resulting in a 99% initiative validation rate.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 50: Substation Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload & DR075 Response	Initiative Validation Rate
144	156	156	12 Substations – Monthly Completion Dates (143 Total)/30 PDF Inspection Reports	99%

VM_7 – 8.2.3.1 Pole Clearing – Non-Focus and Non-Field Verifiable

Table 8-12 of the WMP states that a three year objective for VM_7 is to maintain enhanced clearance specifications and evaluate effectiveness with a completion date of December 2025. In the 2024 IE ARC, BVES informed the IE that the VM-07 would receive a policy update in 2025. The IE requested documentation verifying that the procedures related to pole clearing were reviewed and update for 2025 and to provide the VM-07 policy update referred to in the 2024 IE process.

In response to DR076, BVES provided a copy of the "BVES Vegetation Management and QA/QC Programs" document dated January 5, 2026. The purpose of the document is to provide requirements for the vegetation management program and associated QA/QC programs. No version or revision history is provided in the document; however, the publication date of January 5, 2026, indicates that the document received a review and update in 2025. BVES should include revision history and notes in their standardized documentation to enhance transparency and recordkeeping.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 51: Pole Clearing

2025 Target	2025 EC AIR	2025 Q4 QDR	DR076 Response	Initiative Validation Rate
Review & Update Procedure	N/A	N/A	Procedure Reviewed & Updated	100%

WM_8 – 8.2.3.2 & Wood & Slash Management – Non-Focus and Non-Field Verifiable

The VM_8 objective is to ensure contractors adhere to the established procedure for removing and disposing of all wood, slash, and other waste generated during vegetation management work. BVES routinely engages in fuels removal activities within the right-of-way to maintain forest health and target overgrown and scattered vegetation that potentially threaten to encroach within vegetation clearance specifications during vegetation management inspections. The WMP has a

risk reduction goal of 3.62% for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

The initiative target for 2025 was to ensure contractor adherence to waste removal procedures. BVES provided a copy of the Vegetation Management Contract, which details specific protocols for contractors under section 4.5.1.9, such as removing waste daily and keeping temporary brush piles to a maximum of 24 inches in depth. As the waste removal requirements are detailed in the contract, it can be reasonably assumed that the contractor is implementing the requirements as not doing so would result in a breach of contract. However, to strengthen their commitment to VM_8, BVES should require an attestation from the contractor that waste is being properly handled as outlined in the contract.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 52: Wood & Slash Management

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Waste Removal Requirements Met	Completed	Achieved	Waste Removal Protocols for Contractors	100%

VM_9 – 8.2.3.3 Clearance – Non-Focus and Non-Field Verifiable

This initiative involves completing vegetation clearance on BVES's system, adhering to clearance specifications that meet or exceed GO 95 requirements. The 2023-2025 WMP set a target of 72 circuit miles cleared and identified a 3.02% risk reduction goal. In the 2025 EC AIR, BVES stated that the risk reduction was achieved.

BVES was asked to provide a list of all completed vegetation management clearance activities which occurred during 2025 with information on Grid ID, Clearing work completion date, circuit miles, total trims, and total removal. The VM_9 Completed Clearance spreadsheet provided in response contains 26 records with a total sum of 91.4 circuit miles. Additional documentation of completed inventory, also in spreadsheet format, indicates there were 2,459 clearance items identified in 2025 with details on Location, Grid ID, Species, Quantity, Trim Style, Foreman, Start Date, Complete Date, and Comments. The IE then cross-referenced Total Trims from the Completed Clearance spreadsheet with Quantity from the 2025 VM_9 Work spreadsheet, to ensure continuity of data.

Based on the documentation provided and the analysis herein, this initiative has been validated by the IE.

Table 53: Clearance

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR078/.b Response	Initiative Validation Rate
72 Circuit Miles	91 Circuit Miles	91 Circuit Miles	91 Circuit Miles	126%

VM_10 – 8.2.3.4 – Fall-In Mitigation (Hazard Tree Removal) – Non-Focus & Field Verifiable

Fall-in mitigation is intended to reduce wildfire ignition risk by identifying and remediating or removing trees that pose a high risk of failure or fracture and could strike BVES electrical equipment if they fall, with priority given to high-risk species and locations in the HFTD. Fall-in events from dead, diseased, structurally compromised, or otherwise hazardous trees represent a significant ignition source in heavily forested service territory, as falling trees and limbs can damage conductors, break poles, and create faults that ignite nearby vegetation. As described in BVES's 2023-2025 WMP, Section 8.2.3.4, BVES uses fall-in mitigation as a vegetation management activity supporting wildfire mitigation. BVES's 2025 target for this initiative was 88 tree remediations or removals within the HFTD, with a 3.02 percent risk-reduction goal identified in the 2025 WMP.

BVES reported remediation or removal of 164 trees in 2025, exceeding the 88-tree target. BVES's 2025 AIR, dated April 1, 2026, and 2025 Q4 QDR both reported 164 trees and classified the initiative as Achieved. In its frontloaded data response and in response to Data Request DR061, BVES provided consolidated documentation for all 164 tree remediations and removals, including address, GPS coordinates, species, number of trees treated per location, and work completion date.

Because the reported population exceeded fifteen units, the IE determined the sample size using Cochran's formula with finite population correction, yielding a field sample of 35 tree locations against the 29-location minimum required under the engagement sampling methodology for the 164-tree population. The IE conducted field observations across the 35 sampled locations, capturing geo-referenced photographs at each site and confirming location identification and completion of the tree remediation or removal.

The sampled locations met the initiative criteria, yielding a Sample Validation Rate of 100 percent. Applying the Initiative Validation Rate formula, the Sample Validation Rate multiplied by BVES-reported completion divided by the WMP target, the Initiative Validation Rate is 186 percent, calculated as 100 percent × 164 / 88. The result exceeds the 95 percent validation threshold. The initiative is Validated.

For illustrative examples, please refer to Figure 12: Example Fall-In Mitigation Field Images.

Figure 12:
Example Distribution Pole Replacements & Reinforcements Field Images

Woodland Rd.
34°15'55.3"N 116°53'25.9"W

813 W. Aeroplane Blvd.
34°15'40.8"N 116°51'36.0"W

Based on this analysis, the documentation provided, and the field sample inspections, the IE has validated this initiative.

Table 54: Fall-In Mitigation (Hazard Tree Removal)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR061 Response	Initiative Validation Rate
88 Removals	164 Removals	164 Removals	164 Removals	186%

VM_11 – 8.2.3.5 Substation Defensible Space – Non- Focus and Non-Field Verifiable

The VM_11 objective is to inspect and clear vegetation in and around BVES's substations to reduce the likelihood of vegetation contacting bare conductor; thereby, reducing the probability of ignition. Substation vegetation clearance work is conducted in response to periodic (monthly)

visual site inspection of each substation. The WMP has a risk reduction goal of 3.02% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved.

The initiative target for 2025 was to complete 13 substations inspections and associated clearing. According to BVES's 2025 annual EC AIR, the utility completed all 13. BVES provided a spreadsheet recording the substations inspected and cleared for 2025; This document included substation name and weed abatement date for 11 or the 13 listed substations. The Village Substation did not have an associated weed abatement date and it was noted that the Maltby substation was deenergized and under construction.

The IE requested 13 items of sampling data to review and verify completeness. BVES provided 11 inspection records, one inspection sheet record for all substations other than Maltby (out of service) and Village. No details or records were provided outlining further conformance or exception to the Village Substation.

Although BVES claimed all 13 Substations were inspected and cleared, the provided documentation demonstrates that only 11 met this target. The reasoning provided for the Maltby Substation is adequate and provides detail and context as to why no inspection or abatement was performed on this substation during 2025. However, no further information was provided for the Village Substation leading to invalidation.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative.

Table 55: Substation Defensible Space

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR062Response	Initiative Validation Rate
13 Substations Inspected & Cleared	13 Substations Inspected & Cleared	13 Substations Inspected & Cleared	11 Substations Inspected & Cleared	85%

VM_12 – 8.2.3.6 High-Risk Species – Non-Focus and Non-Field Verifiable

Per Section 8.2.3.6 of the 2025 WMP, the VM_12 objective is the removal of any fast-growing trees, such as Locusts and Poplars, that are hanging over or leaning towards bare lines. However, per table 8-14, the target is WMP plan review and vegetation discussion with experts. The WMP has a risk reduction goal of 3.02% for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

In the frontload data request, the IE asked for documentation demonstrating ongoing efforts to remediate high-risk species *and* meeting dates, agendas, and minutes with vegetation experts. BVES provided the 2025 High-Risk Species Mitigation Inventory which included tree location, species, trim style, and completion date of work. A total of 338 locations and associated completion dates were listed with 778 trees worked on. However, BVES did not provide documentation verifying WMP plan review and discussion with experts.

BVES has demonstrated that they are actively tracking and remediating high-risk species trees; however, the utility should provide documentation that aligns directly with the target outlined in the WMP or update the target to align with the objective detailed in Section 8.2.3.6.

Although BVES did not provide documentation verifying discussion with experts occurred, the utility did provide adequate documentation to demonstrate implementation of the initiative as detailed in Section 8.2.3.6 of the 2025 WMP.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 56: High-Risk Species

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
WMP Plan Review & Vegetation Discussion with Experts	N/A	N/A	338 High-Risk Locations 778 Trees Remediated	100%

VM_13 – 8.2.3.7 Fire-Resilient Rights-of-Way – Non-Focus and Non-Field Verifiable

The Fire-Resilient Right-of-Way (ROW) clearance initiative applies to all ROWs in HFTD Tier 3 and to all ROWs in HFTD Tier 2 designated as having high strike potential. The 2023-2025 WMP did not set a quantitative target for this initiative but identified a 4.51% risk-reduction goal. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

Although the 2025 Q4 QDR reported no completions, the 2025 AIR states that BVES completed work on a high-risk right-of-way that is in the only HFTD Tier 3 location in BVES's territory. BVES crews worked alongside the U.S. Forest Service to complete this fire-resilient right-of-way and is shown to be completed on September 9, 2024.

Based upon this analysis and the documentation reviewed, the IE determined that VM_13 is not applicable to implementation year 2025.

Table 57: Fire-Resilient Rights-of-Way

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
N/A	Completed and Ongoing for 2026-2028 WMP cycle	In Progress	Inspection Report	Not Applicable

VM_14 – 8.2.3.8 Emergency Response Vegetation Management – Non-Focus and Non-Field Verifiable

The Emergency Response Vegetation Management procedure initiative's purpose is to review and update BVES's procedures for vegetation management during and after major events, such as a major storm or other disaster. The 2023-2025 WMP did not set a quantitative target for this initiative but identified a 3.02% risk-reduction goal. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

BVES provided records in response to the IE's data request showing that a review and procedural update was completed. BVES provided the following information:

1. Bear Valley Electric Service, Inc., Public Safety Power Shutoff Plan dated March 5, 2025.
2. PSPS exercise spreadsheet with Engagement Type, Activity, Attendees – Internal, Attendees – External, Quarter and Date.
3. Bear Valley Electric Service, Inc., Public Safety Power Shutoff Post-Season Report dated March 1, 2026.

The BVES PSPS Post-Season Report stated that BVES experienced no PSPS events for 2025. The PSPS Plan was dated March 5, 2025, indicating annual review for 2025. The PSPS Exercise Spreadsheet demonstrated 13 instances of PSPS related exercises or correspondence for 2025 occurring in July through December.

Based upon this analysis and the documentation reviewed, the IE has validated this initiative.

Table 58: Emergency Response Vegetation Management

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Verification of Readiness & Review of Plan	N/A	In Progress	Reviewed and Updated Procedure	100%

VM_15 – 8.2.4 Vegetation Management Enterprise System – Non-Focus and Non-Field Verifiable

The VM Enterprise System initiative's purpose is to review and update procedures related to BVES' Vegetation Management enterprise systems. The 2023-2025 WMP set a 2025 target to complete this review and identified a 3.02% risk reduction goal. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

In 2025, BVES implemented AiDASH Integrated Vegetation Management System for collecting vegetation inventory data. Documentation provided as part of the frontload request includes a contract for vegetation management service beginning November 15, 2020, and ending November 14, 2023, with an option to renew for two (2) years. BVES also provided a screenshot of the Vegetation Management Enterprise System.

In DR066, the IE requested documentation demonstrating that the contract with AiDASH had been extended. BVES supplied three contracts pertaining to the vegetation management enterprise system with AiDASH. The first one terminated on June 1, 2026, the second one extended until June 2, 2026, and the third one extended the contract until May 31, 2029.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 59: Vegetation Management Enterprise System

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR066 Response	Initiative Validation Rate
Ongoing Monitoring and Maintenance	N/A	In Progress	Ongoing Monitoring and Maintenance	100%

VM_16 – 8.2.5 Vegetation Management Quality Assurance/Quality Control – Non-Focus and Non-Field Verifiable

The Vegetation Management Quality Assurance/Quality Control (QA/QC) reviews and audits initiative involves completing QA/QC reviews of vegetation work and program audits to promote consistent and effective vegetation management. The 2023-2025 WMP set a target to complete 72 vegetation management QA/QC reviews, with an associated risk-reduction goal of 4.36%. In the 2025 EC AIR, BVES stated that the risk reduction was achieved.

In support of Initiative VM_16, BVES was asked to provide documentation of all vegetation QA/QCs completed in 2025. In its 2025 Q4 QDR and 2025 EC AIR, BVES reported the completion of 187 vegetation management audits and in its 2025 EC AIR, BVES states the AiDASH Integrated Vegetation Management System was implemented in January of 2025 for collecting vegetation inventory data. The utility responded by submitting an excel spreadsheet with 187 vegetation management records which included Date, Inspector, and Location.

The IE requested 29 QAQC reviews for sampling purposes with 21 from HFTD 3, 5 from HFTD 2, and 3 from non-HFTD. The reports provided included a % pass rate for the inspection audited. No issues or discrepancies were identified during review.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 60: Vegetation Management Quality Assurance/Quality Control

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR067 Response	Initiative Validation Rate
72 Vegetation QCs	187 Vegetation QCs	187 Vegetation QCs	187 QA/QC Records	260%

VM_17 – 8.2.6 Vegetation Management Open Work Orders – Non-Focus and Non-Field Verifiable

The Corrective Action Timeframe Compliance initiative's purpose is to maintain compliance with corrective action timeframes for vegetation management work orders, following GO 95 Rule 18 requirements. The 2023-2025 WMP set a target to maintain compliance and identified a 3.02% risk-reduction goal. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

In support of VM_17, BVES was asked to provide documentation demonstrating the open work order management process with details, including but not limited to, procedures, prioritization criteria based on risk, action plan for addressing any backlog of work orders, and documentation proving that all open work orders have been resolved. The utility responded with a list of all 3,280 work orders in 2025, all of which showed final completion which confirms that no vegetation management work orders were open past their due date in 2025.

Based upon this analysis and the documentation reviewed, the IE has validated this initiative.

Table 61: Vegetation Management Open Work Orders

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
All Work Orders Resolved Within GO95 Timeframe	N/A	In Progress	3,280 Completed Work Orders	100%

VM_18 – 8.2.7 Vegetation Management Workforce Planning – Non-Focus and Non-Field Verifiable

The Staffing Level Verification initiative's purpose is to verify that the current vegetation management staffing level meets business needs. The 2023-2025 WMP set a target to complete this verification and identified a 3.62% risk-reduction goal. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

In support of VM_18, BVES was asked to provide documented verification of the appropriate staffing levels for vegetation-related activities for 2025. Although the 2025 Q4 QDR and the 2025 AIR does not show completion information for 2025, the utility responded with a sample daily log showing the scheduled crew for Mowbray's Tree Service dated August 4, 2025. In addition, a copy of an executed contract with The Original Mowbray's Tree Service, Inc., was provided; however, the original contract expired on November 14, 2023. In a subsequent data request (DR069), BVES was asked to provide documentation demonstrating that the option to extend the original contract was completed/executed. The utility responded with an updated contract which expires on November 16, 2028, with an option to renew for two additional years.

Based upon this analysis and the documentation reviewed, the IE has validated this initiative.

Table 62: Vegetation Management Workforce Planning

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload & DR069 Response	Initiative Validation Rate
Staffing Level Verified	N/A	In Progress	Daily Staffing Sample, Executed Contract	100%

VM_19 – 8.2.2.7 AiDash – Non-Focus and Non-Field Verifiable

BVES is using AiDash software to provide a complementary review of its vegetation management around electrical lines and equipment. AiDash uses satellite imaging to provide a rapid assessment of BVES's service territory and insight into vegetation that should be assessed or moved up in priority for upcoming patrol, detailed, or third-party ground inspections. AiDash will not be used as a standalone program but to validate and escalate the inspection schedules of the existing programs. The satellite inspection will be conducted once per year. BVES did not set a risk reduction goal for this initiative.

The WMP did not set a target for this initiative nor did BVES provide a risk reduction goal. As part of the frontload request, BVES provided a screenshot of the vegetation management platform, indicating ongoing monitoring and maintenance of the system.

Based on the documentation provided, this initiative is not applicable for 2025. Refer to VM_15 for details on the vegetation management enterprise system and AiDash.

Table 63: AiDash

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
N/A	N/A	In Progress	N/A	Not Applicable

4.2.2.2 Funding Verification – Findings

The IE reviewed BVES's 2025 funding implementation for the Vegetation Management and Inspections category against the 2025 planned spend filed in the 2023–2025 WMP, using 2025 EC AIR Attachment D as the primary evidence base, supplemented by BVES's responses to BVES_DR004 and BVES_DR004.b and, where provided, the underlying vendor records.

The IE cross-checked BVES's standalone 2025 cost reporting (BVES_DR001) against 2025 EC AIR Attachment D and found agreement for the Vegetation Management initiatives within rounding, except that Table 6 lists the VM_19 (AiDash) 2025 actual as $6.8 thousand while 2025 EC AIR Attachment D and the percent variance in the same row both indicate $8.6 thousand; the IE recommends BVES correct the Table 6 entry. For initiatives with an absolute percent difference

greater than 10%, the IE elaborates findings below; for all others, the IE refers the reader to Table 44.

VM_1 – 8.2.2.1 Detailed Inspections

Strategic Overview and Risk Mitigation – Detailed vegetation inspections across the territory to identify wildfire-risk conditions; the 2025 target was 53 circuit miles.

Financial Performance Analysis

- **Planned Spend:** $14.3K
- **Actual Expenditure:** $31.3K
- **Variance:** +$17.0K (+118.9% overspend)
- **Driver:** small-base OPEX overspend – additional internal inspection labor at an increased BVES rate.
- **BVES Justification:** BVES states inspection labor hours exceeded the small forecast while the 53-circuit-mile target was achieved.

Operational Impact and Risk Reduction – BVES reported completion of the 53-circuit-mile target. The implementation review did not validate this initiative; the validation status is reflected in Table 43, against a 4.36% risk-reduction goal. The funding variance reflects small-base labor forecasting rather than an identified funding shortfall.

Assessment and Conclusion – Small-base OPEX overspend with the target achieved; no funding-adequacy or implementation concern.

VM_2 – 8.2.2.1 Patrol Inspections

Strategic Overview and Risk Mitigation – Routine vegetation patrol inspections across the territory; the 2025 target was 205 circuit miles.

Financial Performance Analysis

- **Planned Spend:** $33.4K
- **Actual Expenditure:** $73.0K
- **Variance:** +$39.6K (+118.6% overspend)
- **Driver:** small-base OPEX overspend – additional internal patrol labor at an increased BVES rate.
- **BVES Justification:** BVES states patrol labor hours exceeded the small forecast while the 205-circuit-mile target was achieved.

Operational Impact and Risk Reduction – The 205-circuit-mile target was met; the variance reflects labor-hour forecasting on a small base, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Small-base OPEX overspend with the target achieved; no funding-adequacy or implementation concern.

VM_3 – 8.2.2.1 UAV HD Photography/Videography

Strategic Overview and Risk Mitigation – Unmanned-aerial high-definition photography and videography for vegetation inspection; the engagement is shared with GD_28.

Financial Performance Analysis

- **Planned Spend:** $74.1K
- **Actual Expenditure:** $59.5K
- **Variance:** −$14.6K (−19.7% underspend)
- **Driver:** contractor-procurement underspend on a paired UAV inspection scope.
- **BVES Justification:** BVES states the work was contracted below forecast with the 205-circuit-mile target achieved under the engagement shared with GD_28.

Operational Impact and Risk Reduction – The target was met at a lower contracted cost; funding did not constrain implementation, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Favorable contractor procurement on a shared scope; no funding-adequacy concern. The shared VM_3/GD_28 engagement is addressed in the synthesis.

VM_4 – 8.2.2.1 LiDAR Inspection

Strategic Overview and Risk Mitigation – LiDAR-based vegetation inspection; the engagement is paired 50/50 with GD_29.

- **Financial Performance Analysis**
- **Planned Spend:** $76.2K
- **Actual Expenditure:** $85.4K
- **Variance:** +$9.2K (+12.1% overspend)
- **Driver:** contractor rate and labor on a paired LiDAR engagement.
- **BVES Justification:** BVES states a higher contracted rate/labor on the shared LiDAR engagement with the target achieved; the amount is supported by vendor backup.

Additional comments: VM_4 and GD_29 are the two halves of one 50/50 LiDAR engagement. The figures $76.2K and $85.4K appear on both initiatives in opposite roles; the validated Davey invoices confirm an actual of $85.4K per side. The VM_4 planned value of $76.2K must be reconciled against AIR Attachment D before the +12.1% variance is treated as final: if the planned value is also the 50/50 figure ($85.4K), VM_4's variance is approximately 0% and the initiative moves to a refer-to-table item. The backup confirms the actual LiDAR allocation, not the planned-versus-actual variance.

Operational Impact and Risk Reduction – The target was met; the overspend reflects contracted rate and labor on a backup-confirmed engagement, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Backup-confirmed actual on a shared engagement; the variance basis is pending reconciliation. BVES reported completion; the implementation review did not validate this initiative; the validation status is reflected in Table 44. The shared VM_4/GD_29 engagement and the planned-spend basis are carried as a reconciliation item to the Executive Summary.

VM_5 – 8.2.2.1 3rd Party Ground Patrol

Strategic Overview and Risk Mitigation – Contracted third-party ground patrol for vegetation conditions; the engagement is paired 50/50 with GD_30.

Financial Performance Analysis

- **Planned Spend:** $61.5K
- **Actual Expenditure:** $16.4K
- **Variance:** −$45.1K (−73.3% underspend)
- **Driver:** favorable contractor procurement on a paired ground-patrol scope.
- **BVES Justification:** BVES states the patrol scope was completed at a lower contracted cost under the shared GD_30 engagement.

Operational Impact and Risk Reduction – The target was met at a lower contracted cost; funding did not constrain implementation, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Favorable procurement on a shared scope; no funding-adequacy concern. Reconciliation item: the booked amount is approximately $1,250 above the invoiced 50/50 split and a misfiled 2024 invoice was paid in 2025; accrual-cut carried to the Executive Summary).

VM_6 – 8.2.2.1 Substation Inspections

Strategic Overview and Risk Mitigation – Vegetation inspections at substation sites; the 2025 target was 144 substations.

Financial Performance Analysis

- **Planned Spend:** $4.5K
- **Actual Expenditure:** $5.1K
- **Variance:** +$0.6K (+13.3% overspend)
- **Driver:** small-base OPEX overspend – additional internal inspection labor.
- **BVES Justification:** BVES states additional inspection labor on a small base with the target exceeded (156 of 144).

Operational Impact and Risk Reduction – BVES reported 156 inspections against the 144-substation target; the implementation review validated this initiative. The variance is a small-base labor effect, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Small-base OPEX overspend with the target exceeded; no funding-adequacy or implementation concern.

VM_7 – 8.2.3.1 Pole Clearing

This $0-budget initiative is not greater than 10%; please refer to Table 44.

VM_8 – 8.2.3.2 Wood and Slash Management

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 44.

VM_9 – 8.2.3.3 Clearance

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 44.

VM_10 – 8.2.3.4 Fall-in Mitigation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 44.

VM_11 – 8.2.3.5 Substation Defensible Space

Strategic Overview and Risk Mitigation – Creation and maintenance of defensible space around substations; the 2025 target was 13 substations.

Financial Performance Analysis

- **Planned Spend:** $15.9K
- **Actual Expenditure:** $9.7K
- **Variance:** −$6.2K (−39.0% underspend)
- **Driver:** contractor-procurement underspend on completed defensible-space scope.
- **BVES Justification:** BVES states the 13-substation scope was completed at a lower contracted cost.

Operational Impact and Risk Reduction – BVES attributed the underspend to favorable contractor pricing on the 13-substation defensible-space scope. The implementation review did not validate this initiative; the validation status is reflected in Table 44, against a 3.02% risk-reduction goal. Funding did not constrain implementation.

Assessment and Conclusion – Favorable contractor procurement on completed scope; no funding-adequacy or implementation concern.

VM_12 – 8.2.3.6 High-risk Species

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 44.

VM_13 – 8.2.3.7 Fire-Resilient Rights-of-Way

Strategic Overview and Risk Mitigation – Development of fire-resilient rights-of-way practices to reduce vegetation ignition risk along corridors.

Financial Performance Analysis

- **Planned Spend:** $14.9K
- **Actual Expenditure:** $17.9K
- **Variance:** +$3.0K (+20.1% overspend)
- **Driver:** small-base OPEX overspend – additional program-development labor.
- **BVES Justification:** BVES states additional program-development labor on a small base with the objective accomplished.

Operational Impact and Risk Reduction – BVES reported the program-development objective. The implementation review marks this initiative Not Applicable for 2025; the status is reflected in Table 43, against a 4.51% risk-reduction goal. The variance is a small-base labor effect and does not indicate a funding-adequacy concern.

Assessment and Conclusion – Small-base OPEX overspend with the objective accomplished; no funding-adequacy or implementation concern.

VM_14 – 8.2.3.8 Emergency Response Vegetation Management

Strategic Overview and Risk Mitigation – Emergency vegetation response to storm and hazard-tree conditions across the territory.

Financial Performance Analysis

- **Planned Spend:** $29.7K
- **Actual Expenditure:** $37.7K
- **Variance:** +$8.0K (+26.9% overspend)
- **Driver:** demand-driven OPEX overspend – higher-than-normal emergency response activity.
- **BVES Justification:** BVES states higher-than-normal emergency response volume rather than scope expansion.

Operational Impact and Risk Reduction – The overspend reflects emergency response volume rather than scope expansion, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Demand-driven overspend; no funding-adequacy or implementation concern.

VM_15 – 8.2.4 Vegetation Management Enterprise System

Strategic Overview and Risk Mitigation – Maintenance and update of the vegetation-management enterprise system supporting the WMP.

Financial Performance Analysis

- **Planned Spend:** $22.3K
- **Actual Expenditure:** $19.7K
- **Variance:** −$2.6K (−11.7% underspend)
- **Driver:** enterprise-system maintenance cost below forecast; objective completed.
- **BVES Justification:** BVES states the system objective was completed below the small forecast.

Operational Impact and Risk Reduction – The system objective was completed with no scope shortfall, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The underspend does not indicate a funding-adequacy concern. Reconciliation item: BVES's AIR and BVES_DR004 explanations are inconsistent (lower cost versus higher labor held under budget); the IE recommends BVES reconcile and document the WMP-versus-base allocation basis (a recurring item with GD_34 and VM_19; carried to the Executive Summary).

VM_16 – 8.2.5 Vegetation Management Quality Assurance / Quality Control

Strategic Overview and Risk Mitigation – Quality assurance and quality control over vegetation-management records; the 2025 target was 72 QCs.

Financial Performance Analysis

- **Planned Spend:** $52.5K

- **Actual Expenditure:** $68.8K
- **Variance:** +$16.3K (+31.0% overspend)
- **Driver:** OPEX overspend – QA/QC volume well above target (187 of 72 QCs).
- **BVES Justification:** BVES states QA/QC volume substantially exceeded the target.

Operational Impact and Risk Reduction – The target was substantially exceeded (187 of 72); the overspend reflects QA/QC volume, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Overspend on substantially exceeded scope; no funding-adequacy or implementation concern.

VM_17 – 8.2.6 Vegetation Management Open Work Orders

Strategic Overview and Risk Mitigation – Resolution of open vegetation-management work orders.

Financial Performance Analysis

- **Planned Spend:** $36.8K
- **Actual Expenditure:** $46.0K
- **Variance:** +$9.2K (+25.0% overspend)
- **Driver:** OPEX overspend – additional open-work-order resolution labor.
- **BVES Justification:** BVES states additional resolution labor with the work reported in progress.

Operational Impact and Risk Reduction – The work was reported in progress; the overspend reflects resolution volume, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – OPEX overspend reflecting resolution volume; no funding-adequacy or implementation concern.

VM_18 – 8.2.7 Vegetation Management Workforce Planning

Strategic Overview and Risk Mitigation – Workforce-planning review supporting the vegetation-management program.

Financial Performance Analysis

- **Planned Spend:** $6.5K
- **Actual Expenditure:** $8.6K
- **Variance:** +$2.1K (+32.3% overspend)
- **Driver:** small-base OPEX overspend – additional workforce-planning review labor.
- **BVES Justification:** BVES states additional workforce-planning review labor on a small base with the objective met.

Operational Impact and Risk Reduction – The objective was met; the variance is a small-base labor effect, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – Small-base OPEX overspend with the objective met; no funding-adequacy or implementation concern.

VM_19 – 8.2.2.7 AiDash

Strategic Overview and Risk Mitigation – AiDash satellite/AI vegetation-analytics subscription supporting the vegetation program; provided as a fixed annual SaaS engagement.

Financial Performance Analysis

- **Planned Spend:** $40.0K
- **Actual Expenditure:** $8.6K
- **Variance:** −$31.4K (−78.4% underspend)
- **Driver:** allocation of a fixed annual SaaS subscription to the WMP (not a procurement saving); annual survey in progress.
- **BVES Justification:** BVES states the variance reflects how the fixed annual cost was allocated to the WMP rather than reduced scope.

Additional comments: BVES_DR004 Item 7 reports the AiDash engagement as a $40.0K fixed annual SaaS fee, of which $8.6K was booked to the 2025 WMP. Confirm against AIR Attachment D whether the planned line is the full $40.0K or a different WMP-allocated figure; the −78.4% reflects allocation of a fixed cost rather than a procurement underspend. The vendor fee ($40.0K) is confirmed; the WMP-versus-base allocation basis is pending. BVES did not provide a risk-reduction goal for this initiative. The IE carries the Table correction ($6.8K to $8.6K) and the allocation-basis documentation as reportable items to the Executive Summary.

Operational Impact and Risk Reduction – The variance reflects allocation of a fixed cost rather than reduced scope; funding did not constrain implementation, with the targeted risk reduction reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

Assessment and Conclusion – The variance does not indicate a funding-adequacy concern. Recommendation: the IE recommends BVES document the WMP-versus-base allocation basis for enterprise software and SaaS (a recurring item with GD_34 and VM_15) and reconcile the booked amount to the subscription invoice; the Table 6 actual should read $8.6K, not $6.8K (carried to the Executive Summary).

4.2.3 Synthesis of Findings

4.2.3.1 Initiative Review

Across the Vegetation Management & Inspections category, BVES demonstrated mixed performance in 2025, meeting or exceeding targets in 14 of 19 initiatives reviewed, while falling short in three inspection-related programs and one substation clearing initiative. The utility achieved notable successes in vegetation clearance activities, with the core clearance program reaching 127% of target (91.4 circuit miles against a 72-mile goal), fall-in mitigation at 186% (164 tree removals against an 88-tree target), and quality assurance reviews at 260% (187 QA/QC audits against a 72-audit target). However, the category experienced significant shortfalls in inspection programs that mirror data management challenges identified in the Grid Design category. The Detailed Inspection Program fell 4 circuit miles short of its 53-mile target (92% achievement), and LiDAR Inspections missed approximately 18 circuit miles of its 205-mile target (91% achievement), both falling below the 95% validation threshold. Additionally, the Substation Defensible Space initiative failed validation when BVES could not document vegetation clearing

at 2 of 13 substations. The Maltby substation was adequately explained as deenergized and under construction, but the Village substation lacked any supporting documentation or explanation for the missing inspection and clearing record. The most common reasons for missing targets were data reconciliation issues between field completion records and circuit mileage calculations (affecting both detailed and LiDAR inspection programs), incomplete documentation of work performed (affecting the substation defensible space initiative), and discrepancies between database exports and source systems that complicated verification efforts across multiple inspection programs.

The IE's documentation review identified a pattern of data management weaknesses that undermined the auditability of otherwise well-executed vegetation management work, including mismatches between pole numbers in frontload data exports and the ResourceKeeper database and missing pole tag photographs despite records indicating they were captured. For the Detailed Inspection Program (VM_1), BVES reported 1,636 inspection points across five circuits, but the IE could only verify 49 circuit miles when cross-referencing against the Circuit Mileage by Circuit documentation, leaving a 4-mile gap that could not be reconciled through the available records. Similarly, the LiDAR Inspection Program (VM_4) reported 197 inspection points across 18 circuits, but circuit mileage totaled only 186.86 miles with four circuits (Radford, Georgia, Pump House, and Sunset) entirely absent from the frontload data, creating an 18-mile shortfall. The IE notes that in both cases, sampled inspection records showed no quality issues, but the data management failures prevent full validation of the reported scope. BVES should implement a standardized circuit mileage verification process that reconciles inspection point counts against circuit length records before submitting completion claims, establish a pre-submission data validation checklist that verifies pole numbers, GPS coordinates, and circuit identifiers match between field records and GIS databases, and require database exports to undergo quality control review before being submitted for regulatory reporting.

BVES demonstrated strong contractor management practices, with executed contracts in place for all third-party vegetation work, daily staffing logs documenting crew deployment, and comprehensive waste removal protocols embedded in contractor agreements. The IE observed during field verification of the fall-in mitigation program that tree removal work was completed thoroughly and that GPS coordinates provided accurate site locations, indicating that field crews are executing work reliably even when administrative data systems introduce verification challenges.

4.2.3.2 Funding Verification

Budget and Expenditure Summary

The Vegetation Management and Inspections category had a total 2025 planned budget of approximately $3,831.8 thousand against actual expenditures of approximately $3,914.0 thousand, a variance of about 2.1% above budget, of the 18 funded VM initiatives, 14 (77.8%) had absolute percent differences exceeding 10%.

Unlike the Grid Design category, VM is close to budget at the category level: the large recurring programs – Clearance, Wood and Slash Management, Fall-in Mitigation, and High-risk Species – together account for the great majority of category spend and each landed within roughly 3% of

plan. The category figures are the arithmetic sum of the initiative-level amounts filed in AIR Attachment D.

Initiatives with Significant Variances

Fourteen of the eighteen funded VM initiatives carried an absolute variance greater than 10%, concentrated in small-base inspection and OPEX line items rather than the large recurring programs. They fall into four driver groups: small-base OPEX overspends with target achieved (VM_1, VM_2, VM_6, VM_13, VM_14, VM_16, VM_17, VM_18); contractor-procurement underspends with target achieved (VM_3, VM_5, VM_11, VM_19); a backup-confirmed LiDAR overspend (VM_4); and an enterprise-system underspend with an inconsistent explanation (VM_15).

Key Trends and Funding Compliance

- The systemic small-base OPEX overspend pattern observed in Grid Design recurs here (VM_1, VM_2, VM_6, VM_13, VM_14, VM_16, VM_17, VM_18): targets were met or exceeded, but actuals materially exceeded small forecasts because of additional internal labor at an increased BVES rate. BVES committed in BVES_DR004 Item 11 to evaluate its 2026–2028 forecasting methodology for these initiatives.
- Five VM inspection initiatives report 2025 figures that match or mirror their Grid Design counterparts – VM_1/GD_25, VM_2/GD_26, VM_3/GD_28, VM_4/GD_29, and VM_5/GD_30 – reflecting shared inspection engagements booked under both categories. The IE recommends BVES confirm these shared costs are counted once and not double-counted in the category roll-ups.
- Enterprise-software and SaaS allocation: VM_19 (AiDash) books a portion of a fixed annual subscription to the 2025 WMP and the allocation basis was not documented; the same pattern appears at GD_34 and VM_15. The IE recommends BVES document its allocation methodology for enterprise software and SaaS.
- One Table 6 presentation correction: the VM_19 (AiDash) 2025 actual is listed as $6.8 thousand, whereas AIR Attachment D and the row's own percent variance both indicate $8.6 thousand; the IE recommends the correction.

Funding Verification – IE Assessment

The IE finds Vegetation Management funding adequate to delivered scope. The category is close to budget overall; the breaching items are concentrated in small-base inspection and OPEX lines where targets were met or exceeded, with the variances explained by small-base labor effects, favorable contractor procurement, and a fixed-cost SaaS allocation rather than funding shortfalls, and the targeted risk reduction is reflected in Table 44's "Satisfied Risk Reduction Goal?" column.

The reportable items the IE carries to the Executive Summary are the enterprise-software/SaaS WMP-versus-base allocation methodology (VM_15, VM_19, with GD_34), the shared-inspection double-counting confirmation (VM_1–VM_5 mirroring GD_25, GD_26, GD_28, GD_29, GD_30), the accrual-cut for the misfiled 2024 ground-patrol invoice paid in 2025 (VM_5/GD_30), and the Table 6 correction of the VM_19 actual to $8.6 thousand.

4.3 SITUATIONAL AWARENESS AND FORECASTING

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.3.1 Initiative Summary Table

Table 64: Initiative Summary Table (Spend in Thousand $)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[25]	Sample Validation Rate (%)[26, 27]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[28, 29, 30]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
SAF_1, 8.3.2, Advanced Weather Monitoring and Weather Stations	100% Ongoing Monitoring and Maintenance	In 2025, BVES evaluated that the current 20 weather stations provide satisfactory coverage (with overlap) of the BVES service area.	In Progress	N/A	N/A	Weather Station List (Frontload Data)	100%	$7.50	$57.40 (665.3%)	Yes (38%)
SAF_2, 8.3.3, Install Fault Indicators	0 Fault Indicators	Completed in 2023	Completed	15 Fault Indicators	100%	Fault Indicator Installation Log (Frontload Data) 15 Activation Records (DR053)	100%	$0	$279	N/A
SAF_3, 8.3.3, Online Diagnostic System	1 Circuit	1 Circuit	Completed	1 Circuit	100%	EGM Sensor Locations Erwin (Frontload Data)	100%	$75.90	$72.70 (-4.2%)	Yes (3.62%)
SAF_4, 8.3.4, HD ALERTWildfire Cameras	N/A	BVES evaluated the HD ALERTCalifornia Cameras as providing satisfactory coverage of the BVES service area.	Completed	N/A	N/A	BVES Written Response (Frontload Data)	Not Applicable	$0	$0	N/A
SAF_5, N/A, Weather Forecasting	100% Ongoing Monitoring and Maintenance	Completed in 2023	In Progress	N/A	N/A	BVES Written Response (Frontload Data)	100%	$67.50	$79.40 (17.6%)	Yes (3.76%)
SAF_6, N/A, Fire Potential Index	100% Ongoing Monitoring and Maintenance	Completed in 2023 & Implementation in 2024.	In Progress	N/A	N/A	BVES Written Response (Frontload Data)	100%	$50.90	$64.80 (27.3%)	Yes (3.46%)
SAF_7, 8.3.3.1, GreenGrid iSIU	No Target Provided	In Progress	In Progress	N/A	N/A	CPUCGG GreenGrid iSIU List (Frontload Data)	100%[31]	$0	$0	No Goal Provided

[25] N/A in the "Sample Size" column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
[26] The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
[27] N/A in the "Sample Validation Rate" column indicates that no sampling was reviewed; therefore, no validation rate was applied.
[28] The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.
[29] Energy Safety's Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.
[30] Not Applicable in the "IE Findings on Initiative" column indicates that the IE determined the initiative to not be relevant for review for implementation year 2025. Refer to the initiative review under section 4.3.2.1 for more detail.
[31] Although the 2025 WMP did not identify a target for this initiative, the documentation provided by BVES demonstrates its implementation in accordance with Section 8.3.3.1 of the WMP. Accordingly, the IE has validated the initiative's implementation against the parameters outlined in that section. See Section 4.3.2.1, Initiative Review for SAF_7.

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[25]	Sample Validation Rate (%)[26, 27]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[28, 29, 30]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
RMA_1, 8.3.5.1, Technosylva Contractor Program	No Target Provided	In Progress	In Progress	N/A	N/A	Technosylva Fully Executed Contract & Amendment (Frontload Data)	100%[32]	$84.80	$378.40 (346.2%)	No Goal Provided
WMSD_1, 8.3.3.4, Evaluating Mitigation Initiatives	No Target Provided	No Progress Claimed	No Status Provided	N/A	N/A	2025 Outage Log BVES Written Response (Frontload Data)	Not Applicable	$31.40	$41.40 (31.8%)	No Goal Provided

[32] Although the 2025 WMP did not identify a target for this initiative, the documentation provided by BVES demonstrates its implementation in accordance with Section 8.3.5.1 of the WMP. Accordingly, the IE has validated the initiative's implementation against the parameters outlined in that section. See Section 4.3.2.1, Initiative Review for RMA_1.

4.3.2 Written Detail for Initiatives

4.3.2.1 Initiative Review – Findings & Method

SAF_1 – 8.3.2 Advanced Weather Monitoring and Weather Stations – Focus and Non-Field Verifiable

In support of Initiative SAF_1, BVES was asked to provide documentation detailing maintenance records for BVES's 20 weather monitoring stations. This weather station maintenance initiative involves the maintenance and calibration of all weather stations based on manufacturers' recommendations to ensure accurate environmental monitoring. A completion target of 100% is identified in the 2023-2025 WMP with a 38% risk reduction goal. In the 2025 EC AIR, BVES did not state if the risk reduction target was met. The utility responded by submitting an Excel list of all 20 weather stations which included the station name, station ID, and status (all showing "active").

Although information was provided documenting the weather station names, station IDs, and statuses (all showing "active"), no further information was initially provided such as station location, work performed, and maintenance work completion date. A subsequent data request was sent (DR052) requesting completion dates of station maintenance activities for the 20 weather stations as well as a sample maintenance record/report for the work completed. The utility responded with spreadsheet titled "Bear Valley Electric Service/Weather Station Maintenance Log 2024" which included sheet "Maintenance Log 2025" detailing what type of maintenance was performed and how frequently. The station location and work performed are shown in this subsequent log, however, there are no completion dates for the work performed. Although the work is only performed annually, BVES should document the maintenance date for accountability and auditing purposes.

Based upon this analysis and the documentation reviewed, the IE has validated this initiative.

Table 65: Advanced Weather Monitoring and Weather Stations

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR052 Response	Initiative Validation Rate
100% Ongoing Monitoring & Maintenance	BVES evaluated that the current 20 Weather Stations provide adequate coverage	In Progress	20 Weather Stations/ Maintenance Log	100%

SAF_2 – 8.3.1 Install Fault Indicators – Focus and Non-Field Verifiable

The SAF_2 objective focuses on evaluating the need and the installation of additional fault indicators (FIs). The goal is to improve system monitoring and reduce the time needed to locate and identify faults.

The 2025 WMP set a target of zero FIs installed for 2025. According to BVES' 2025 Q4 QDR and EC AIR, the utility did not claim to install any FIs and indicated that the project was completed in 2023. In response to the frontload data, BVES provided documentation of FIs installed throughout 2025, totaling 15 installs. Six FIs were installed at the North Shore/Stanfield Cutoff (12024BV), three FIs were installed at the 34Kv Down feed to Fawnskin substation (15137BV), three were installed at the Baldwin North Shore & Paradise (16074BV), and three were installed at the 4Kv Castle Glen across from 1132 Sherwood (12367BV).

The IE requested documentation of completion for all 15 installations performed in 2025 for sampling purposes. BVES provided screenshots of the FI dashboard indicating all 15 were online with all poles represented and associated fault location and information present.

The IE reviewed common data provided, confirming alignment and consistency. The IE identified no issues or discrepancies during this review.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 66: Install Fault Indicators Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR053 Response	Initiative Validation Rate
0	Project Completed in 2023	N/A	15 Fault Indicators Installed 2025	100%

SAF_3 – 8.3.3 Online Diagnostic System – Non-Focus and Non-Field Verifiable

The Grid Monitoring System installation initiative involves the installation of a grid monitoring system on a BVES circuit to pinpoint irregularities that may lead to hardware failures or ignitions sources. The 2023-2025 WMP set a target to complete the installation on one circuit in 2025 and identified a 3.62% risk reduction goal. In the 2025 EC AIR, BVES stated that the risk reduction was achieved.

The 2025 Q4 QDR reported that the installation was complete, meeting the annual target. Documentation provided in the frontload requests consisted of an email detailing EGM sensor location on the Erwin 4 kV circuit. EGM Meta-Alert is a grid operation monitoring system that measures/observes faults due to fire, grounding, or third-party impact in real-time. Based on this email, three (3) EGM sensors were deployed.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 67: Online Diagnostic System

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR053 Response	Initiative Validation Rate
1 circuit	1 circuit	1 circuit	1 circuit	100%

SAF_4 – 8.3.4.1 HD ALERTWildfire Cameras – Non-Focus and Non-Field Verifiable

The SAF_4 objective is to evaluate the need for additional HD ALERT Cameras for satisfactory coverage of the BVES service area. The HD Cameras provide visual awareness into the territories adjacent to electrical assets and maintain live accounts of risk drivers during hazardous weather conditions. The cameras owned by BVES will also contribute to the Southern California system, which comprises a shared network of utility, academic, and fire response cameras to provide coverage of live feeds to monitor conditions and assist emergency event awareness.

No target nor risk reduction goal were outlined for this initiative in the 2025 WMP. BVES's partners (UCSD, Big Bear Fire Department, San Bernadino Fire Department, San Bernadino Office of Emergency Services, and Cal Fire) did not indicate a need for future cameras. In addition, this is a data-gathering and monitoring initiative with no specific annual completion target. BVES confirmed it does not install or perform maintenance on the HD cameras.

The IE identified no issues or discrepancies during this review. Based on the review of documentation and sample verification, the IE determines this initiative to be not applicable to implementation year 2025.

Table 68: HD ALERT Wildfire Cameras

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
N/A	BVES evaluated the HD Alert Cameras provide satisfactory coverage	N/A	BVES Does Not Install or Perform Maintenance on HD Cameras	Not Applicable

SAF_5 – N/A Weather Forecasting – Non-Focus and Non-Field Verifiable

Data was gathered to assess this initiative, specifically BVES's staff efficiency in utilizing their advanced fire threat weather forecasting tools. Per frontload request submission, BVES does not perform maintenance for the Technosylva platform, and instead utilizes Technosylva's maintenance and updates. Wildfire risk is monitored daily and reports summarizing wildfire risk are sent to key personnel. Review of RMA_1 provides more detail on the Technosylva Contractor initiative.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 69: Weather Forecasting

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
100% Ongoing Monitoring and Maintenance	N/A	In Progress	Ongoing Monitoring and Maintenance	100%

SAF_6 – N/A Fire Potential Index – Non-Focus and Non-Field Verifiable

Data associated with the ongoing monitoring and maintenance of BVES's fire potential index was assessed. In the Frontload data, BVES clarified that they do not perform maintenance for the Technosylva FPI on its platform and instead utilize Technosylva's maintenance and updates. Review of RMA_1 provides more detail on the Technosylva Contractor initiative.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 70: Fire Potential Index

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
100% Ongoing Monitoring and Maintenance	N/A	In Progress	Ongoing Monitoring and Maintenance	100%

SAF_7 – 8.3.3 GreenGrid iSIU– Non- Focus and Non- Field Verifiable

In review of initiative SAF_7, no mention of an initiative by this initiative tracking ID is found in the 2023-2025 WMP. SAF_7 is mentioned on Table 1 of QDR4 but it is not mentioned in the 2025 EC AIR.

Section 8.3.3.1 of the WMP provides detail that SAF_7 is the implementation of a pilot program to install cameras on poles that continuously monitor the pole and associated line in partnership with Green Grid Inc. The iSIU system provides automated monitoring of asset physical condition as well as ignition monitoring. The system consists of camera units (nodes) that contain optical sensors, communication modules, processors, and power supply. These nodes allow for autonomous monitoring of the power line infrastructure and can advise the remote maintenance, inspections, or operator crews on equipment status and potential hazardous events.

No target or risk reduction goal was provided in the 2025 WMP. In response to the frontload data, BVES provided a spreadsheet that demonstrated installation of 15 new Green Grid camera trackers, with all installations taking place in June of 2025. At the time of this review, two cameras are actively streaming and in service, 13 of the 15 cameras installed are in troubleshooting status.

The IE identified no issues or discrepancies during this review. Although the 2025 WMP did not identify a target for this initiative, the documentation provided by BVES demonstrates its implementation in accordance with Section 8.3.3.1 of the WMP. Accordingly, the IE has validated the initiative's implementation against the parameters outlined in that section and confirms that BVES has installed Green Grid iSIU cameras as detailed in section 8.3.3.1.

Table 71: GreenGrid iSIU

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
No Target Provided	N/A	Qualitative	15 Cameras Installed CPUCGG Spreadsheet	100%

RMA_1 – 8.3.5.1 Technosylva Contractor Program – Focus and Non-Field Verifiable

In support of Initiative RMA_1, BVES was asked to provide documentation demonstrating that a fully executed contract with Technosylva was in place with ongoing utilization of fire spread modeling and risk reduction opportunities. The utility responded by submitting a 40-page document entitled "*Bear Balley Electric Service, Inc., Individual Contract*" with an origination date of April 27, 2022, and an execution/signed date of May 9, 2022, stating Technoslyva Inc. as the Contractor. This contract states the description of work as "*Technosylva to provide advanced weather & wildfire modeling & forecasting per Technosylva 'Bear Valley Electrical Service 2022 State of Work & Cost Proposal' dated March 15, 2022, to include Phase 1 and Phase 2 of proposal, term for 3 years with option to extend for 2 additional years.*" In addition, the utility company provided a 3-page amendment document which states the following: "*The Amendment No. 1 is issued to only add Technosylva Fire Potential Index (FPI) Subscription annually for two years to run in conjunction with year 2 and year 3 of the existing WFA-E/WRRM contract (C#3234) with option to extend for 2 additional years.*" This amendment was effective on September 22, 2023, and executed/signed on September 26, 2023.

This executed contract and amendment are in place for the purpose of weather, wildfire modeling, forecasting and Fire Potential Index (FPI) assistance, it appears that the individual contract with Technosylva Inc. expired on April 26, 2025. In a subsequent data request (DR051), the IE requested documentation that the option to extend the original contract was completed/executed. The utility responded with an executed extension which expires on April 26, 2027.

Although the 2025 WMP did not identify a target for this initiative, the documentation provided by BVES demonstrates its implementation in accordance with Section 8.3.5.1 of the WMP. Accordingly, the IE has validated the initiative's implementation against the parameters outlined in that section. Based on this analysis and the documentation provided, IE has validated this initiative.

Table 72: Technosylva Contractor Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR051 Response	Initiative Validation Rate
No Target Provided	N/A	In Progress	Contract Executed May 9, 2022/ Option to Extend to 4/26/27	100%

WMSD_1 – 8.3.3.4 Evaluating Mitigation Initiatives – Non-Focus and Non-Field Verifiable

The Evaluating Mitigation Initiatives encompasses 8.3.3.4 (Evaluating Mitigation Initiatives), 8.3.4.2 (Evaluation and Selection of New Detection Systems), 8.3.4.3 (Planned Integration of New Detection Technologies), and 8.3.4.4 (Evaluating Mitigation Initiatives). There is no stated goal within the 2023-2025 WMP nor was there a stated risk-reduction goal.

In support of WMSD_1, BVES was asked to provide documentation demonstrating that review and evaluation of the Wildfire Mitigation Strategy occurred twice in 2025. The utility responded with a spreadsheet containing a 2025 Outage Log tab which included the log (57 entries), 2025 System Indices tab, 2025 Circuit Indices tab, Instructions tab, and Lists tab. In addition, the following statement was provided regarding the Wildfire Mitigation Strategy review process: "*BVES updates the outage log monthly and has seen improvements in CAIDI compared to previous years as our Wildfire Mitigation Strategy has continued to be implemented.*"

Although an outage log was provided for review and BVES provided a statement on improvements for 2025, no explicit target was outlined for WMSD_1 in the 2025 WMP. Therefore, the IE determined this initiative to be not applicable for implementation year 2025.

Table 73: Evaluating Mitigation Initiatives

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
N/A	N/A	N/A	2025 Outage Log/Statement	Not Applicable

4.3.2.2 Funding Verification – Findings

The IE reviewed BVES's 2025 funding implementation for the Situational Awareness and Forecasting category against the 2025 planned spend filed in the 2023–2025 WMP, using AIR Attachment D as the primary evidence base, supplemented by BVES's responses to BVES_DR004 and BVES_DR004.b and, where provided, the underlying vendor records (statements of work, contracts, and invoices).

Several Situational Awareness initiatives are contracted services whose final support depends on the referenced statements of work, contracts, and invoices. The Risk Methodology and Assessment

engagement (RMA_1) is filed within this chapter at 8.3.5.1 and is reported here. For initiatives with an absolute percent difference greater than 10%, the IE elaborates findings below; for all others, the IE refers the reader to Table 64.

ST_1, WMSD_1, and RMA_1 are reported in the Situational Awareness and Forecasting funding section for funding-verification reporting because they do not have a native WMP category.

SAF_1 – 8.3.2 Advanced Weather Monitoring and Weather Stations

Strategic Overview and Risk Mitigation – Operation and maintenance of the distribution weather-station network supporting situational awareness; the 2025 scope covered annual maintenance of 20 stations.

Financial Performance Analysis

- **Planned Spend:** $7.5K
- **Actual Expenditure:** $57.4K
- **Variance:** +$49.9K (+665.3% overspend)
- **Driver:** small-base OPEX overspend – station-maintenance labor and replacement parts above the small forecast.
- **BVES Justification:** BVES states annual maintenance was performed on 20 weather stations with two replacements in 2025, at a labor-and-parts cost well above the small budget.

Operational Impact and Risk Reduction – All weather stations were properly serviced; the variance reflects maintenance cost on a small base rather than scope shortfall, with the targeted risk reduction of 38 percent.

Assessment and Conclusion – Small-base OPEX overspend with the maintenance scope completed; no funding-adequacy concern. As a contracted-services line, the IE examined the two weather-station replacement records (BVES_DR004 Item 8) and confirms the 2025 replacements; the maintenance labor on the 20-station network is reported by BVES.

SAF_2 – 8.3.3 Install Fault Indicators

This $0-budget initiative reflects $279.0K of prior-year (2023–2024) project work invoiced in 2025 (reported +100%); BVES_DR004 Item 3 confirms the cost was not accrued in 2023 or 2024. As a prior-year carryover against a $0 budget, it is excluded from the >10% count, and the IE carries a lifecycle-cost observation to the synthesis; please refer to Table 64.

SAF_3 – 8.3.3 Online Diagnostic System

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 63.

SAF_4 – 8.3.4 HD ALERTWildfire Cameras

BVES reports this initiative complete with no 2025 expenditure; no funding finding required. Please refer to Table 64.

SAF_5 – 8.3.5 Weather Forecasting

Strategic Overview and Risk Mitigation – Contracted weather-forecasting services supporting daily operational and PSPS decision-making.

Financial Performance Analysis

- **Planned Spend:** $67.5K
- **Actual Expenditure:** $79.4K
- **Variance:** +$11.9K (+17.6% overspend)
- **Driver:** OPEX overspend – contracted forecasting expenses above the planned amount.
- **BVES Justification:** BVES states contracted forecasting costs were higher than initially planned.

Operational Impact and Risk Reduction – The forecasting service was maintained; the overspend reflects contracted cost rather than scope shortfall, with the targeted risk reduction of 3.76 percent.

Assessment and Conclusion – Contracted-cost overspend with the service delivered; no funding-adequacy concern. As the 2025 EC AIR cites only a contracted-cost driver with no DR004 elaboration, final support depends on the forecasting contract and invoices.

RMA_1 – 8.3.5.1 Risk Methodology and Assessment – Utility Risk Model (Technosylva Contractor)

Strategic Overview and Risk Mitigation – Contracted development of the BVES Utility Risk Model with the risk-quantification contractor; the engagement was implemented and ongoing in 2025.

Financial Performance Analysis

- **Planned Spend:** $84.8K
- **Actual Expenditure:** $378.4K
- **Variance:** +$293.6K (+346.2% overspend)
- **Driver:** OPEX overspend – expanded contracted scope to further develop the Utility Risk Model.
- **BVES Justification:** BVES states the additional contracted expense reflects work with the contractor to further develop the Utility Risk Model under the referenced statement of work.

Operational Impact and Risk Reduction – The risk-model development advanced in 2025; the overspend reflects expanded contracted scope rather than a funding shortfall. BVES did not provide a risk-reduction goal for this initiative.

Assessment and Conclusion – Expanded-scope contracted overspend on an ongoing engagement; no funding-adequacy concern. The contractor's statement of work uses its own internal initiative identifiers, which the IE does not cross-map to BVES WMP initiative IDs; final support depends on the SOW and invoices (BVES_DR004 Item 8).

SAF_6 – 8.3.6 Fire Potential Index

Strategic Overview and Risk Mitigation – Contracted fire-potential-index service supporting situational awareness and PSPS decision-making.

Financial Performance Analysis

- **Planned Spend:** $50.9K
- **Actual Expenditure:** $64.8K
- **Variance:** +$13.9K (+27.3% overspend)
- **Driver:** OPEX overspend – contracted expenses above the planned amount.
- **BVES Justification:** BVES states contracted costs were higher than initially planned.

Operational Impact and Risk Reduction – The index service was maintained; the overspend reflects contracted cost rather than scope shortfall, with the targeted risk reduction of 3.46 percent.

Assessment and Conclusion – Contracted-cost overspend with the service delivered; no funding-adequacy concern. As with SAF_5, final support depends on the service contract and invoices.

SAF_7 - 8.3.3 GreenGrid iSIU

BVES did not report 2025 planned or actual spend for this initiative in AIR Attachment D; no funding variance applies. Please refer to Table 64.

ST_1 – 5.4.5 Environmental Compliance and Permitting

Strategic Overview and Risk Mitigation – Environmental compliance and permitting activities supporting WMP execution. BVES did not provide a risk-reduction goal for this initiative.

Financial Performance Analysis:

- **Planned Spend:** $26.2K
- **Actual Expenditure:** $34.5K
- **Variance:** +$8.3K (+31.7% overspend)
- **BVES Justification**: BVES states that permitting costs were higher than anticipated, which was related to the overall increase project work conducted in 2025.

Operational Impact and Risk Reduction – The variance is a small-base effect; funding did not appear to constrain progression. The implementation and validation status is reflected in Table 64.

Assessment and Conclusion – Small-base overspend on a compliance line; no funding-adequacy concern indicated, pending confirmation of the BVES driver.

WMSD_1 – 8.3.3.4 Wildfire Mitigation Strategy Development

Strategic Overview and Risk Mitigation – Development and annual evaluation of the wildfire mitigation strategy. BVES did not provide a risk-reduction goal for this initiative.

Financial Performance Analysis:

- **Planned Spend**: $31.4K (AIR Attachment D, WMSD_1);
- **Actual Expenditure:** $41.4K (AIR Attachment D, WMSD_1);
- **Variance:** +$10.0K (+31.8% overspend) (AIR Attachment D, variance column);
- **BVES Justification:** BVES states the costs were higher than estimated due to more labor hours dedicated to this effort.

Operational Impact and Risk Reduction – The variance is a small-base effect; funding did not appear to constrain progression. The implementation review marks this initiative Not Applicable for 2025 (no stated WMP target); the status is reflected in Table 64.

Assessment and Conclusion – Small-base overspend; no funding-adequacy concern indicated, pending the BVES driver. The funding finding is required because the absolute percent difference exceeds 10%, even though the initiative is Not Applicable for implementation in 2025.

4.3.3 Synthesis of Findings

4.3.3.1 Initiative Review

Across the Situational Awareness and Forecasting category, BVES demonstrated strong performance in 2025, with all initiatives reviewed either validated or determined not applicable due to lack of defined targets in the 2023-2025 WMP. The utility maintained operational readiness across its core monitoring infrastructure, including 20 active weather stations providing environmental data coverage, a fully executed contract with Technosylva for advanced weather and wildfire modeling through April 2027, and continued utilization of the Fire Potential Index subscription for daily wildfire risk assessment. BVES exceeded expectations in several areas where no formal targets were established, installing 15 fault indicators across four circuit locations despite a stated 2025 target of zero installations (the utility had reported project completion in 2023), deploying three EGM Meta-Alert sensors on the Erwin 4 kV circuit to enable real-time fault detection, and installing 15 Green Grid iSIU camera nodes in June 2025 to provide autonomous monitoring of power line infrastructure and ignition detection capabilities. However, the category revealed challenges in target-setting clarity and documentation completeness, with multiple initiatives lacking quantitative targets or risk reduction goals in the WMP (HD ALERT Wildfire Cameras, Weather Forecasting, Fire Potential Index, GreenGrid iSIU, and Evaluating Mitigation Initiatives), and several programs showing incomplete maintenance documentation that complicated verification efforts. The most common issues affecting this category were ambiguous or missing WMP targets that made performance assessment difficult, incomplete maintenance records lacking completion dates or detailed work descriptions, and technology deployment challenges, particularly with the Green Grid camera system where 13 of 15 installed units remained in troubleshooting status at the time of review rather than actively streaming.

For the Advanced Weather Monitoring initiative (SAF_1), BVES provided a list of 20 active weather stations and a maintenance log detailing the types of maintenance performed and frequency, but the log lacked completion dates for the work, making it impossible to verify that maintenance occurred within 2025 or to assess compliance with manufacturer-recommended maintenance intervals. Similarly, the Weather Forecasting and Fire Potential Index initiatives (SAF_5 and SAF_6) were validated based on BVES's confirmation that Technosylva performs ongoing platform maintenance and that wildfire risk reports are distributed daily to key personnel, but no sample risk reports, platform usage logs, or decision-making documentation were provided to demonstrate how forecasting tools are actively integrated into operational protocols. The GreenGrid iSIU initiative (SAF_7) exemplified technology deployment, with 15 camera nodes installed in June 2025 but only 2 actively streaming and 13 remaining in troubleshooting status five months later, while installation occurred, the system has not yet achieved operational readiness. BVES should implement standardized maintenance logging protocols that require completion dates, technician signatures, and work descriptions for all weather station and monitoring equipment maintenance activities, establish a formal technology deployment

verification process that includes acceptance testing and operational readiness criteria before installations are reported as complete, and develop quarterly technology performance reports that document system uptime, fault detection accuracy, and integration with operational decision-making.

4.3.3.2 Funding Verification

Budget and Expenditure Summary

The Situational Awareness and Forecasting category (SAF_1 through SAF_6) had a total 2025 planned budget of $201.8 thousand against actual expenditures of $553.3 thousand, a 174.2% variance above budget.

This category-level figure is distorted by the SAF_2 (Install Fault Indicators) prior-year carryover, which booked $279.0 thousand in 2025 against a $0 2025 budget. Excluding SAF_2, the funded SAF initiatives spent $274.3 thousand against $201.8 thousand planned, a 35.9% variance above budget.

The Risk Methodology and Assessment engagement RMA_1, filed within this chapter at 8.3.5.1, adds $378.4 thousand of actual spend against $84.8 thousand planned and is the single largest variance reported in the chapter. The category figures are the arithmetic sum of the initiative-level amounts filed in AIR Attachment D.

Initiatives with Significant Variances

Excluding SAF_2 (a $0-budget prior-year carryover) and SAF_4 (no 2025 activity), three of the four in-scope SAF initiatives exceed ±10% – SAF_1 (+665.3%), SAF_5 (+17.6%), and SAF_6 (+27.3%) – with SAF_3 (−4.2%) the sole exception; the RMA_1 risk-model engagement also exceeds ±10% (+346.2%). The breaches concentrate in small-base station maintenance (SAF_1) and contracted services (SAF_5, SAF_6, RMA_1).

Key Trends and Funding Compliance

- The category is contracted-services-heavy: the SAF_5, SAF_6, and RMA_1 overspends depend on the referenced statements of work, contracts, and invoices for final support.
- SAF_2 (Install Fault Indicators) is a prior-year carryover – $279.0 thousand invoiced in 2025 against a $0 2025 budget and confirmed not accrued in 2023 or 2024 (BVES_DR004 Item 3). The 2023–2025 lifecycle is approximately $569,777 against a $282,080 WMP forecast (about +102%); the IE carries this lifecycle observation forward and recommends BVES present a lifecycle reconciliation.
- The small-base OPEX overspend pattern seen in Grid Design and Vegetation Management recurs on SAF_1 station maintenance; BVES committed in BVES_DR004 Item 11 to evaluate its 2026–2028 forecasting methodology.
- RMA_1's contractor statement of work uses its own internal initiative identifiers; the IE does not cross-map these to BVES WMP initiative IDs and recommends BVES keep the SOW-to-WMP mapping documented.
- The native-SAF category total ($201.8K planned / $553.3K actual) excludes the orphan initiatives RMA_1, ST_1, and WMSD_1, which are reported and totaled separately.

Funding Verification – IE Assessment

The IE finds Situational Awareness and Forecasting funding adequate to delivered scope. Apart from the SAF_2 carryover, the variances are explained by small-base maintenance cost and higher contracted-service costs on completed or ongoing engagements rather than funding shortfalls, and the targeted risk reduction is reflected in Table 64's "Satisfied Risk Reduction Goal?" column.

The reportable items the IE carries to the Executive Summary are the SAF_2 lifecycle reconciliation (2023–2025 fault-indicator spend versus WMP forecast), the backup-validation dependency for the contracted-service overspends (SAF_5, SAF_6, RMA_1), and the recommendation that BVES keep the RMA_1 contractor SOW-to-WMP initiative mapping documented. The IE also notes BVES does not track variance at the initiative level (BVES_DR004 Item 4) and recommends initiative-level variance tracking for 2026–2028.

4.4 EMERGENCY PREPAREDNESS

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.4.1 Initiative Summary Table

Table 74: Initiative Summary Table (Spend in Thousand $)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[33]	Sample Validation Rate (%)[34, 35]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[36, 37]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
EP_1, 8.4.2.1, Emergency Preparedness Plan	Yearly Review by FEMA Six-Step Process Completed by Apr. 2025	Objective Completed	In Progress	N/A	N/A	BVES ERDP Rev. 2 BVES ERDP Review Written Response PSPS Exercise Spreadsheet (Frontload Data)	100%	$5	$6.60 (32.0%)	Yes (3.62%)
EP_2, 8.4.3.1, External Collaboration & Coordination	Meetings completed throughout the year	Objective Completed	In Progress	N/A	N/A	Community Partner Mutual Aid Log (Frontload Data)	100%	$22.70	$30.80 (35.7%)	Yes (3.62%)
EP_3, 8.4.4, Public Emergency Comms. Strategy	Review and Evaluate Communication Strategy Two Times Per Year	Quarterly Revisions	In Progress	N/A	N/A	PSPS Exercise Spreadsheet (Frontload Data)	100%	$4.40	$5.90 (34.1%)	Yes (3.62%)
EP_4, 8.4.5.1, Preparedness & Planning for Service Restoration	Update Service Restoration Plan with Operations Group by June 2025	Update on March 5, 2025	In Progress	N/A	N/A	PSPS Exercise Spreadsheet (Frontload Data)	0%	$6	$7.90 (31.7%)	No (3.62%)
EP_5, 8.4.6, Customer Support in Wildfire & PSPS Emergencies	Yearly Review and Evaluate PSPS Program completed by April 2025	Objective Completed	In Progress	N/A	N/A	Pre-Season Report Correspondence Pre-Season Tables Pre-Season Report (Frontload Data)	0%	$3.70	$4.80 (29.7%)	No (3.62%)

[33] N/A in the "Sample Size" column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
[34] The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
[35] N/A in the "Sample Validation Rate" column indicates that no sampling was reviewed; therefore, no validation rate was applied.
[36] The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.
[37] Energy Safety's Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.

4.4.2 Written Detail for Initiatives

4.4.2.1 Initiative Review – Findings & Method

EP_1 – 8.4.2.1 Emergency Preparedness Plan – Non-Focus and Non-Field Verifiable

The EP_1 objective is to improve staff training on emergency and disaster response plans through a combination of classroom instruction, table-top exercises, and functional drills. BVES's approach to wildfire and PSPS emergency preparedness is to utilize the BVES Emergency Disaster Response Plan (EDRP) and the BVES PSPS Policy and Procedures plan to effectively and efficiently respond to a loss of power including a proactive de-energization (PSPS event) or wildfire event impacting the BVES service area. BVES will utilize a PSPS to promote public safety as a measure of last resort by decreasing the risk of utility infrastructure as a source of wildfire ignitions. The method of achieving this objective is to Evaluate EDRP through FEMA Six Step review process and conduct training, exercises and drills. The WMP has a risk reduction goal of 3.62% for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

The initiative target for 2025 was to perform an annual review by FEMA six-step process completed by April 2025. According to BVES's 2025 annual EC AIR, the utility reviewed the plan via the simulated emergency exercises documented in the PSPS Exercise Spreadsheet.xlsx file. During this review, no changes were determined to be necessary, and the existing plan was maintained. BVES provided a narrative description of their review, a copy of the Emergency & Disaster Response Plan, and a PSPS Exercise Spreadsheet. The spreadsheet indicated 13 engagements of various types such as collaboration with other utilities and local organizations.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 75: Emergency Preparedness Plan

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Yearly Review by FEMA Six-Step Process Completed by April 2025	Objective Completed	In Progress	2025 PSPS Training Exercises and 13 Stakeholder Engagements	100%

EP_2 – 8.4.3.1 External Collaboration and Coordination – Non-Focus and Non-Field Verifiable

The EP_2 objective is to increase coordination with community stakeholders in emergency response. BVES outlined a goal of continued engagement with local stakeholders to prepare for and respond to fire-related events per table 8-33 of the WMP. The WMP listed a risk impact percentage of 3.62%. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

The initiative target for 2025 was to conduct meetings with stakeholders throughout the year. According to BVES's 2025 annual EC AIR, the utility completed 4 engagements. The utility provided a spreadsheet listing the 4 engagements such as meetings or tours with various stakeholders such as Big Bear Fire Department, City of Big Bear Lake, and Bear Valley Community Healthcare District. All four meetings took place in August through October of 2025 and included discussion on topics such as:

- Local Emergency Response to Wildfires
- PSPS Events and Response
- Mutual Mountain Aid Association

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 76: External Collaboration and Coordination

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Meetings with Community Partners and Mutual Aid Groups	Objective Completed	In Progress	4 Engagement Meetings Completed	100%

EP_3 – 8.4.4 Public Emergency Communication Strategy – Non-Focus and Non-Field Verifiable

The EP_3 objective is to develop lines and layers of communications with stakeholders and customers. This includes evaluating increased use of social media and technology to improve and streamline communications with stakeholders and customers. The method of achieving this objective is by coordination meetings, exercises, and functional drills with community stakeholders. The WMP has a risk reduction goal of 3.62% for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

The initiative target for 2025 was to review and evaluate communication strategy two times per year. BVES's 2025 annual EC AIR claimed that the initiative had been completed. The utility provided a PSPS Exercise Spreadsheet. The spreadsheet indicated the utility completed 13 engagement activities, specifically the BVES 2025 Annual PSPS Tabletop Exercise and BVES 2025 Annual PSPS Functional Exercise where the Emergency Disaster Response Plan was reviewed. BVES provided a response that the EDRP had undergone its annual maintenance process, and no changes were determined to be necessary. Section 5 of the Emergency Disaster Response Plan outlines the "Emergency & Disaster Response Communication Plan" and Section 6 outlines "Customer Support in Emergencies."

Based on this analysis and the documentation provided, IE has validated this initiative. BVES should explicitly detail the events where the communication strategy is reviewed for increased recordkeeping and accountability purposes.

Table 77: Public Emergency Communication Strategy

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Review and Evaluate Communication Strategy Two Times per Year	Quarterly Revisions	In Progress	Review and Evaluate Communication Strategy	100%

EP_4 – 8.4.5.1 Preparedness and planning for service restoration – Non- Focus and Non-Field Verifiable

This initiative pertains to BVES's customer support during wildfire and PSPS emergencies and sets forth a target to update the service restoration plan by June 2025. The WMP has a risk reduction goal of 3.62% for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

According to BVES's 2025 EC AIR, the utility completed this update on March 5, 2025, incorporating lessons learned from the Full-Scale and Tabletop Training exercises conducted. The utility provided the PSPS Exercise spreadsheet as frontload data response to this initiative. This spreadsheet included two exercises related to PSPS: BVES 2025 Annual PSPS Tabletop Exercise and BVES 2025 Full-Scale Exercise (FSX) Annual PSPS Functional Exercise, completed June 18 and 24, respectively.

In the 2025 EC AIR, BVES states that lessons learned from these two training exercises were incorporated into the March 5, 2025, update of the Service Restoration Plan; however, these events did not take place until June 2025, thus presenting a discrepancy. No other event or exercise listed in the frontload data provided was conducted prior to June 2025. BVES did not provide a copy of the updated Service Restoration Plan.

Based on this analysis and the review of documentation, the IE does not validate this initiative, and the risk reduction goal has not been met. BVES should provide a copy of the service restoration plan with revision date and explicitly detail the events where the plan was updated with the operations group for accountability and auditing purposes.

Table 78: Service Restoration Planning

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Update Service Restoration Plan with Operations Group by June 2025	Update on March 5, 2025	In Progress	2025 PSPS Stakeholder Engagements	0%

EP_5 – 8.4.6 Customer Support in Wildfire & PSPS Emergencies – Non-Focus and Non-Field Verifiable

The EP_5 objective is to establish programs, systems, and protocols to support residential and non-residential customers in wildfire and PSPS emergencies. The method of achieving this objective is through coordination meetings, exercises, and functional drills with residential and non-residential customers. The WMP has a risk reduction goal of 3.62% for this initiative. In the 2025 EC AIR, BVES did not state if the risk reduction target was met.

The initiative target is to conduct an annual review and to evaluate the PSPS program by April 2025. BVES's 2025 annual EC AIR, the utility claimed to have completed this initiative. In response to the frontload data, BVES provided a spreadsheet, R1812005_BVESU913E_2025 pre-season tables, and July 1, 2025, PSPS Pre-Season Report. The IE identified that BVES did not experience a PSPS event last year. However, BVES did implement one Community Resource Center (CRC) in January 2025 in response to a Southern California Edison utility PSPS event and voluntarily established a CRC to support the community. This demonstrates support for their service territory during a PSPS event.

Despite these efforts, the initiative target required completion of the annual PSPS program review by April 2025. The documentation provided by BVES indicates that the PSPS Pre-Season Report was submitted to the CPUC on July 1, 2025, approximately three months after the required completion date. As a result, BVES did not meet the timeline established in its WMP commitment. Based on this analysis and documentation provided, the IE has not validated this initiative, and therefore concludes that the associated risk reduction objective was not achieved

Table 79: Customer Support in Wildfire & PSPS Emergencies

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Yearly Review and Evaluate PSPS Program Completed by April 2025	Objective Completed	In Progress	2025 PSPS Pre-Season Report	0%

4.4.2.2 Funding Verification – Findings

The IE reviewed BVES's 2025 funding implementation for the Emergency Preparedness category against the 2025 planned spend filed in the 2023–2025 WMP, using AIR Attachment D as the primary evidence base, supplemented by BVES's responses to BVES_DR004 and BVES_DR004.b.

The Emergency Preparedness initiatives are small-base OPEX line items that BVES groups under a single variance driver in BVES_DR004 Item 11 (additional labor hours, including hours arising from the unplanned SCE PSPS event); the IE attributes the grouped driver accordingly.

For initiatives with an absolute percent difference greater than 10%, the IE elaborates findings below; for all others, the IE refers the reader to Table 74.

EP_1 – 8.4.2 Emergency Preparedness Plan

Strategic Overview and Risk Mitigation – Annual review and update of the emergency and PSPS response plans.

Financial Performance Analysis

- **Planned Spend:** $5.0K
- **Actual Expenditure:** $6.6K
- **Variance:** +$1.6K (+32.0% overspend)
- **Driver:** Small-base OPEX overspend – additional labor hours to update existing emergency and PSPS plans.
- **BVES Justification:** BVES states the plan updates required more hours than estimated on a small ($5K) budget, with all 2025 activities achieved.

Operational Impact and Risk Reduction – The planned activities were achieved; on a small base a modest dollar increase produces a large percentage, with the targeted risk reduction of 3.62 percent.

Assessment and Conclusion – Small-base OPEX overspend with activities completed; no funding-adequacy or implementation concern.

EP_2 – 8.4.3 External Collaboration and Coordination

Strategic Overview and Risk Mitigation – Participation in Joint IOU workshops and wildfire-mitigation coordination forums.

Financial Performance Analysis

- **Planned Spend:** $22.7K
- **Actual Expenditure:** $30.8K
- **Variance:** +$8.1K (+35.7% overspend)
- **Driver:** OPEX overspend – additional Joint IOU workshops and wildfire-mitigation conferences attended.
- **BVES Justification:** BVES states higher-than-estimated costs to attend additional Joint IOU workshops and wildfire-mitigation conferences.

Operational Impact and Risk Reduction – The planned coordination activities were achieved; the overspend reflects additional events attended, with the targeted risk reduction of 3.62 percent.

Assessment and Conclusion – OPEX overspend reflecting additional coordination activity; no funding-adequacy or implementation concern.

EP_3 – 8.4.4 Public Emergency Communication Strategy

Strategic Overview and Risk Mitigation – Maintenance of the public emergency-communication strategy for wildfire and PSPS events.

Financial Performance Analysis

- **Planned Spend:** $4.4K
- **Actual Expenditure:** $5.9K
- **Variance:** +$1.5K (+34.1% overspend)
- **Driver:** Small-base OPEX overspend – additional labor hours, including scope expansion from the unplanned SCE PSPS event.
- **BVES Justification:** BVES states more labor hours than estimated on a small ($4.4K) budget, with additional hours arising from the unplanned SCE PSPS event (BVES_DR004 Item 11) and all 2025 activities achieved.

Operational Impact and Risk Reduction – The planned activities were achieved; the small base amplifies the percentage, with the targeted risk reduction of 3.62 percent.

Assessment and Conclusion – Small-base OPEX overspend with activities completed; no funding-adequacy or implementation concern.

EP_4 – 8.4.5 Preparedness and Planning for Service Restoration

Strategic Overview and Risk Mitigation – Annual review and lessons-learned update of service-restoration procedures.

Financial Performance Analysis

- **Planned Spend:** $6.0K
- **Actual Expenditure:** $7.9K
- **Variance:** +$1.9K (+31.7% overspend)
- **Driver:** Small-base OPEX overspend – additional annual review and lessons-learned update hours.
- **BVES Justification:** BVES states more annual review and lessons-learned update hours than estimated, with increased BVES labor cost, on a small ($6K) budget.

Operational Impact and Risk Reduction – BVES reported updating the service-restoration procedures. The implementation review did not validate this initiative; the validation status and the unmet risk-reduction goal of 3.62 percent are reflected in Table 74. The funding variance reflects a small-base labor effect and does not itself indicate a funding-adequacy concern.

Assessment and Conclusion – Small-base OPEX overspend with activities completed; no funding-adequacy or implementation concern.

EP_5 – 8.4.6 Customer Support in Wildfire and PSPS Emergencies

Strategic Overview and Risk Mitigation – Maintenance of customer-support procedures for wildfire and PSPS emergencies.

Financial Performance Analysis

- **Planned Spend:** $3.7K
- **Actual Expenditure:** $4.8K
- **Variance:** +$1.1K (+29.7% overspend)
- **Driver:** Small-base OPEX overspend – additional annual procedure review and update hours.
- **BVES Justification:** BVES states more procedure review and update hours than estimated, with increased BVES labor cost, on a small ($3.7K) budget.

Operational Impact and Risk Reduction – BVES reported completion of the customer-support review activity. The implementation review did not validate this initiative; the validation status and the unmet risk-reduction goal of 3.62 percent are reflected in Table 74. The funding variance reflects a small-base labor effect and does not itself indicate a funding-adequacy concern.

Assessment and Conclusion – Small-base OPEX overspend with activities completed; no funding-adequacy or implementation concern.

4.4.3 Synthesis of Findings

4.4.3.1 Initiative Review

Across the Emergency Planning and Preparedness category, BVES demonstrated mixed performance in 2025, meeting operational objectives in three of five initiatives while failing to meet documentation and timeline requirements in two programs. The utility maintained active engagement with emergency preparedness activities, conducting 13 PSPS-related exercises and stakeholder engagements throughout 2025, completing four community coordination meetings with fire departments and healthcare partners, and maintaining updated Emergency Disaster Response Plan (EDRP) and PSPS Policy and Procedures documents. BVES demonstrated operational readiness by voluntarily establishing a Customer Resource Center in January 2025 to support the community during a Southern California Edison PSPS event affecting the region, even though BVES itself did not experience a PSPS event in 2025. However, the category revealed significant challenges in meeting WMP-specified timelines and providing complete documentation to verify claimed completions, with the Service Restoration Planning initiative (EP_4) showing a logical impossibility, BVES claimed to incorporate lessons learned from training exercises into a March 5, 2025 plan update, but the exercises did not occur until June 2025, and the Customer Support initiative (EP_5) missing its April 2025 review deadline by submitting the required PSPS Pre-Season Report to CPUC on July 1, 2025. The most common reasons for initiative failures were timeline non-compliance where deliverables were completed after WMP-specified deadlines, documentation gaps where claimed work could not be verified through the records provided, and logical inconsistencies between reported completion dates and supporting evidence that undermined the credibility of completion claims.

For the Emergency Preparedness Plan initiative (EP_1), BVES provided a comprehensive PSPS Exercise Spreadsheet documenting 13 engagements including tabletop exercises, functional drills, and stakeholder collaborations, along with a narrative description confirming that the EDRP underwent FEMA six-step review with no changes deemed necessary, this initiative was validated

because the documentation clearly demonstrated the required annual review occurred. Similarly, the External Collaboration initiative (EP_2) was validated based on clear documentation of four stakeholder meetings with fire departments, municipal government, and healthcare partners, with meeting dates, attendees, and discussion topics all recorded. However, the Service Restoration Planning initiative (EP_4) failed validation due to a fundamental documentation inconsistency. BVES claimed in its 2025 AIR that lessons learned from Full-Scale and Tabletop Training exercises were incorporated into a March 5, 2025, Service Restoration Plan update, but the PSPS Exercise Spreadsheet shows these exercises occurred on June 18 and June 24, 2025, three months after the claimed plan update date, making the stated sequence of events impossible. Additionally, BVES did not provide a copy of the updated Service Restoration Plan with revision history to verify that any update occurred or to assess what changes were made. The Customer Support initiative (EP_5) failed validation due to timeline. The WMP specified completion of the annual PSPS program review by April 2025, but BVES submitted its PSPS Pre-Season Report to CPUC on July 1, 2025, representing a three-month delay beyond the committed deadline.

BVES demonstrated genuine community partnership through its voluntary CRC activation during the SCE PSPS event, indicating that emergency preparedness is not merely a compliance exercise but reflects operational values and community commitment. The Public Emergency Communication Strategy initiative (EP_3) was validated based on the 13 documented engagement activities, though the IE noted that BVES should more explicitly identify which specific events constitute the required twice-annual communication strategy reviews to strengthen accountability and enable clearer year-over-year tracking.

4.4.3.2 Funding Verification

Budget and Expenditure Summary

The Emergency Preparedness category had a total 2025 planned budget of $41.8 thousand against actual expenditures of $56.0 thousand, a 34.0% variance above budget. The category is composed entirely of small-base OPEX line items, the largest of which is approximately $23 thousand. The category figures are the arithmetic sum of the initiative-level amounts filed in AIR Attachment D.

Initiatives with Significant Variances

All five Emergency Preparedness initiatives exceed ±10% (ranging from +29.7% to +35.7%), each a small-base OPEX overspend with the planned 2025 activities achieved. BVES groups the driver under BVES_DR004 Item 11 – additional labor hours, including hours arising from the unplanned SCE PSPS event.

Key Trends and Funding Compliance

- Every Emergency Preparedness line item is small (approximately $3.7 thousand to $23 thousand); on these bases a modest absolute-dollar increase produces a large percentage, so the percentages overstate the funding significance.
- The grouped driver is additional labor hours, with EP_3 specifically citing scope expansion from the unplanned SCE PSPS event (BVES_DR004 Item 11).

- The small-base OPEX overspend pattern is consistent across Grid Design, Vegetation Management, Situational Awareness, and Emergency Preparedness; BVES committed in BVES_DR004 Item 11 to evaluate its 2026–2028 forecasting methodology.

Funding Verification – IE Assessment

The IE finds Emergency Preparedness funding adequate to delivered scope. BVES reported completion of the Emergency Preparedness activities; final implementation validation is reflected in Table 74 (EP_4 and EP_5 were not validated). The funding variances are small-base labor effects and do not indicate that funding constrained progression.

The IE carries no category-specific erratum to the Executive Summary. It notes that BVES does not track variance at the initiative level (BVES_DR004 Item 4) and recommends initiative-level variance tracking and improved small-base forecasting for 2026–20

4.5 COMMUNITY OUTREACH AND ENGAGEMENT

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.5.1 Initiative Summary Table

Table 80: Initiative Summary Table (Spend in Thousand $)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[38]	Sample Validation Rate (%)[39, 40]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[41, 42]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
COE_1 ,8.5.2, Public Outreach & Education Awareness Program	360 Public Outreach & Education Events	1,184 Public Outreach & Education Events	Completed	34 Public Outreach & Education Events	100%	WMP PSPS Outreach Tracking Log (Frontload Data) 34 Outreach Records (DR006)	329%	$95.50	$131.10 (37.3%)	Yes (3.62%)
COE_2 ,8.5.3, Engagement with Access and Functional Needs Populations	12 AFN Customer Needs Verified	26 AFN Customer Needs Verified	Completed	15 AFN Customer Needs Verified	100%	AFN Email Correspondence WMP PSPS Outreach Tracking Log (Frontload Data)	200%[43]	$31.80	$41.60 (30.8%)	Yes (3.62%)
COE_3 ,8.5.4, Collaboration on Local Wildfire Mitigation Planning	Review and Maintain Program	Objective Completed	Completed	N/A	N/A	Local Fire Mitigation Collaboration Log (Frontload Data)	100%	$24	$30.50 (27.1%)	Yes (3.62%)
COE_4 ,8.5.5, Best Practice Sharing with Other Utilities	15 Work Groups & Conferences	125 Work Groups & Conferences	Completed	27 Work Groups & Conferences	93%	Nonlocal Fire Mitigation Collaboration Log (Frontload Data) 25 Event Records (DR009)	750%[44]	$15.70	$20.70 (31.8%)	Yes (3.62%)

[38] N/A in the "Sample Size" column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
[39] The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
[40] N/A in the "Sample Validation Rate" column indicates that no sampling was reviewed; therefore, no validation rate was applied.
[41] The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.
[42] Energy Safety's Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.
[43] Although all sampling data was validated, based on the documentation provided, the IE found that BVES demonstrated 24 instances of AFN customer needs verified rather than the 26 claimed, resulting in a 200% initiative validation rate. (24 * 1 / 12 = 2 * 100 = 200%) See Section 4.5.2.1, Initiative Review for COE_1.
[44] Data provided by BVES indicates that participation in 121 groups and/or conferences occurred in 2025, not the claimed 125. The IE was only able to validate 25 pieces of sampling data resulting in a 93% sample validation rate. Therefore, the initiative validation rate is 750%. (121 * .93 / 15 = 7.502 * 100 = 750.2%)

4.5.2 Written Detail for Initiatives

4.5.2.1 Initiative Review – Findings & Method

COE_1– 8.5.1.2– Public Outreach and Education Awareness Program – Non-Focus and Non-Field Verifiable

The COE_1 objective is to continue to deploy and improve public outreach and education awareness program(s) for wildfires; outages due to wildfires, PSPS events, protective equipment and device settings; service restoration before, during, and after the incidents and vegetation management, in addition evaluate effectiveness of outreach efforts. The method of achieving these objectives is through various communication platforms such as Facebook and Grizzly. The WMP has a risk reduction goal of 3.62% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved.

The initiative target for 2025 was 360 total events. According to BVES's 2025 annual EC Air claimed, the utility completed 1,184 public outreach and education events, significantly above the 360 annual target. BVES provided a spreadsheet with the total number of community outreach events for 2025. The method of communication is through Grizzly, KBHR, or Facebook and the data reflects a total of 1,184 public outreach events conducted across all four quarters of 2025.

The IE requested 34 items of sampling data to review and verify completeness for COE_1. BVES provided 41 Facebook posts spanning all four quarters that included details and links to various wildfire and PSPS resources. BVES also provided 5 Grizzly ads that directed customers to various resources pertaining to Wildfire and PSPS events.

The IE identified no issues or discrepancies during this review. Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 81: Public Outreach and Education Awareness Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR006 Response	Initiative Validation Rate
360 Outreach and Educational Events	1,184 Outreach and Educational Events	1,184 Outreach and Educational Events	1,184 Outreach and Educational Events	329%

COE_2 – 8.5.1.2 Engagement with Access and Functional Needs Populations – Non-Focus and Non-Field Verifiable

The COE_2 objective is to continue improving the program to understand, evaluate, design, and implement wildfire and PSPS risk mitigation strategies, policies, and procedures specific to AFN customers, in addition to evaluating the effectiveness of these efforts. The utility also identifies relevant community stakeholder groups in its service territory and describes the protocols, practices, and procedures used to provide notification of wildfires, outages due to wildfires and PSPS, and service restoration before, during, and after each incident type. BVES uses multiple

engagement strategies to connect with AFN populations. This WMP states a risk reduction goal of 3.62% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved.

The initiative target for 2025 was 12 AFN customer verifications. According to BVES's 2025 EC AIR, the utility completed 26 AFN verifications associated with public outreach and education events, exceeding the 12 verifications annually targeted. BVES provided a spreadsheet demonstrating a total of 24 instances of email correspondence that demonstrated that an AFN list was being updated and entered in the PSPS portal. The IE found that throughout the year, BVES continually evaluated and updated their AFN list and made effort to reach these populations through email, phone, and alternative contacts. The IE requested 15 items of sampling data to review and verify completeness for COE_2. BVES provided the same 24 instances of email correspondence with the BVES Customer Program Specialist, stating that the AFN list had been updated on the PSPS Portal.

The IE reviewed common data provided, confirming alignment and consistency. The IE identified that support documentation on demonstrated 24 instances of AFN customer needs being verified, not the 26 claimed in the EC AIR.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 82: Engagement with Access and Functional Needs Populations

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR007 Response	Initiative Validation Rate
12 AFN Customer Needs Verified	26 AFN Customer Needs Verified	26 AFN Customer Needs Verified	24 AFN Customer Needs Verified	200%

COE_3 – 8.5.4 Collaboration on Local Wildfire Mitigation Planning – Non-Focus and Non-Field Verifiable

The COE_3 objective is to work with stakeholders to develop and integrate plans, programs, and/or policies for collaborating with communities on local wildfire mitigation planning, such as wildfire safety elements in general plans, community wildfire protection plans, and local multi-hazard mitigation plans. The initiative focuses on engagement with local government and agencies, including county and city, on wildfire mitigation. The method of achieving this objective is through meetings, stakeholder tours, system briefings, and annual tabletop and functional exercises. The WMP has a risk reduction goal of 3.62% for this initiative. BVES did not state whether the risk reduction goal was achieved in the 2025 EC AIR.

The 2025 initiative target is to review and maintain the program. According to BVES's 2025 EC AIR, the utility completed 6 local engagements of various types. In response to the frontload data, BVES provided a spreadsheet documenting a total of 6 activities such as meetings or tours with

various stakeholders. Stakeholders included, but were not limited to, Cal Fire, Big Bear Fire Department, City of Big Bear Lake, and Bear Valley Community Healthcare District.

The IE reviewed the documentation provided and confirmed collaboration effort throughout the year to engage with local agencies. The IE identified no issues or discrepancies during this review.

Based on this analysis and the documentation provided, IE has validated this initiative.

Table 83: Collaboration on Local Wildfire Mitigation Planning

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & Response	Initiative Validation Rate
Review and Maintain Program	Objective Completed	Objective Completed	6 Engagements Throughout 2025 with Local Stakeholders	100%

COE_4 – 8.5.5 Best Practice Sharing with Other Utilities – Non-Focus and Non-Field Verifiable

The COE_4 objective is to establish a routine for sharing lessons learned and best practices among other California IOUs in working group meetings and public communications. Additionally, BVES collaborates with out-of-state electric utilities. The California IOUs share feedback provided by customers and the public regarding recommendations and concerns. BVES engages with utilities outside of California to exchange best practices both for utility wildfire mitigation and stakeholder cooperation when responding to wildfires. The WMP has a risk reduction goal of 3.62% for this initiative. In the 2025 EC AIR, BVES stated that the risk reduction was achieved.

The initiative target for 2025 was participation in 15 work groups and/or conferences. According to BVES's 2025 annual EC AIR, the utility completed 125 engagements with other utilities, above target. In response to the frontload data, BVES provided a spreadsheet detailing participation in various working groups and conferences across all four quarters of 2025. This spreadsheet included the type of activity, BVES internal attendees, external attendees, quarter and date held, and topics discussed. After reviewing the documentation, the IE was only able to verify BVES's participation in 121 groups and/or conferences.

The IE requested 27 items of sampling data to review and verify completeness for COE_4. BVES provided 25 pieces of data that included event documentation such as agendas and email correspondence, confirming attendance.

The IE reviewed common data provided, confirming alignment and consistency. The IE identified no issues or discrepancies during this review.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 84: Best Practice Sharing with Other Utilities

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR009 Response	Initiative Validation Rate
15 Work Groups & Conferences	125 Work Groups & Conferences	125 Work Groups & Conferences	121 Work Groups & Conferences	750%

4.5.2.2 Funding Verification – Findings

The IE reviewed BVES's 2025 funding implementation for the Community Outreach and Engagement category against the 2025 planned spend filed in the 2023–2025 WMP, using AIR Attachment D as the primary evidence base, supplemented by BVES's responses to BVES_DR004 and BVES_DR004.b.

Two of the Community Outreach initiatives (COE_1 and COE_2) carry a dual variance driver: the EC AIR cites higher advertising and contracted public-relations costs, while BVES_DR004 Item 11 cites additional hours arising from the unplanned SCE PSPS event. The IE presents both the AIR driver and the DR004 supplemental driver and does not assert any unsupported rate movement pending backup. For initiatives with an absolute percent difference greater than 10%, the IE elaborates findings below; for all others, the IE refers the reader to Table 80.

COE_1 – 8.5.2 Public Outreach and Education Awareness Program

Strategic Overview and Risk Mitigation – Public wildfire-safety outreach and education across the territory; 2025 activity included 1,184 reported engagements.

Financial Performance Analysis

- **Planned Spend:** $95.5K
- **Actual Expenditure:** $131.1K
- **Variance:** +$35.6K (+37.3% overspend)
- **Driver:** OPEX overspend – higher advertising and contracted public-relations costs (AIR), with additional hours arising from the unplanned SCE PSPS event (BVES_DR004 Item 11).
- **BVES Justification:** BVES attributes the overspend to higher advertising and contracted public-relations costs and to additional outreach hours during the unplanned SCE PSPS event, with the program completed.

Operational Impact and Risk Reduction – The outreach program was completed; the overspend reflects advertising and public-relations cost and added PSPS-driven activity rather than scope shortfall, with the targeted risk reduction of 3.62 percent.

Assessment and Conclusion – OPEX overspend on a completed program; no funding-adequacy concern. The IE presents the AIR advertising/public-relations driver alongside the BVES_DR004 Item 11 PSPS-hours driver and does not assert a rate movement pending the advertising and contractor invoices.

COE_2 – 8.5.3 Engagement with Access and Functional Needs Populations

Strategic Overview and Risk Mitigation – Targeted engagement with access and functional needs (AFN) populations; 2025 activity included 26 reported engagements.

Financial Performance Analysis

- **Planned Spend:** $31.8K
- **Actual Expenditure:** $41.6K
- **Variance:** +$9.8K (+30.8% overspend)
- **Driver:** OPEX overspend – higher advertising and contracted public-relations costs (AIR), with additional hours arising from the unplanned SCE PSPS event (BVES_DR004 Item 11).
- **BVES Justification:** BVES attributes the overspend to higher advertising and contracted public-relations costs and to additional AFN engagement hours during the unplanned SCE PSPS event, with the activities completed.

Operational Impact and Risk Reduction – The AFN engagement activities were completed; the overspend reflects advertising and public-relations cost and added PSPS-driven activity rather than scope shortfall, with the targeted risk reduction of 3.62 percent.

Assessment and Conclusion – OPEX overspend on completed activities; no funding-adequacy concern. As with COE_1, the IE presents the AIR advertising/public-relations driver alongside the BVES_DR004 Item 11 PSPS-hours driver and does not assert a rate movement pending the advertising and contractor invoices.

COE_3 – 8.5.4 Collaboration on Local Wildfire Mitigation Planning

Strategic Overview and Risk Mitigation – Collaboration with local agencies and utilities on wildfire-mitigation planning.

Financial Performance Analysis

- **Planned Spend:** $24.0K
- **Actual Expenditure:** $30.5K
- **Variance:** +$6.5K (+27.1% overspend)
- **Driver:** Small-base OPEX overspend – additional conferences and meetings for collaboration with other utilities.
- **BVES Justification:** BVES states additional collaboration conferences and meetings on a small ($24K) budget, with the 2025 activities achieved.

Operational Impact and Risk Reduction – The planned collaboration activities were achieved; the small base amplifies the percentage, with the targeted risk reduction of 3.62 percent.

Assessment and Conclusion – Small-base OPEX overspend with activities completed; no funding-adequacy or implementation concern.

COE_4 – 8.5.5 Best Practice Sharing with Other Utilities

Strategic Overview and Risk Mitigation – Sharing of wildfire-mitigation best practices with other utilities; 2025 activity included 125 reported engagements.

Financial Performance Analysis

- **Planned Spend:** $15.7K
- **Actual Expenditure:** $20.7K
- **Variance:** +$5.0K (+31.8% overspend)
- **Driver:** Small-base OPEX overspend – additional conferences and meetings for best-practice sharing.
- **BVES Justification:** BVES states additional best-practice conferences and meetings on a small ($15.7K) budget, with the 2025 activities achieved.

Operational Impact and Risk Reduction – The planned best-practice-sharing activities were achieved; the small base amplifies the percentage, with the targeted risk reduction of 3.62 percent.

Assessment and Conclusion – Small-base OPEX overspend with activities completed; no funding-adequacy or implementation concern.

4.5.3 Synthesis of Findings

4.5.3.1 Initiative Review

Across the Community Outreach and Engagement category, BVES demonstrated exceptional performance in 2025, meeting or substantially exceeding targets in all four initiatives reviewed and achieving validation for the entire category. The utility surpassed its outreach commitments, completing 1,184 public education events against a 360-event target (329% achievement), verifying 24-26 Access and Functional Needs (AFN) customer records against a 12-verification target (200-217% achievement), and participating in 121-125 utility working groups and conferences against a 15-event target (807-833% achievement). BVES maintained active collaboration with local wildfire mitigation stakeholders through six documented engagements with fire departments, municipal governments, and healthcare partners throughout 2025. The utility demonstrated multi-channel communication capabilities, leveraging Facebook, local newspaper (Grizzly), and radio (KBHR) platforms to reach diverse community segments, and showed sustained commitment to AFN population support through continuous year-round list updates and multi-contact-method verification efforts. The primary observation across all initiatives was minor discrepancies between claimed completion numbers in the EC AIR and verifiable documentation, BVES claimed 1,184 outreach events but this matched documentation, claimed 26 AFN verifications but documentation showed 24, and claimed 125 working group participations but documentation verified 121, though in all cases the verified counts substantially exceeded WMP targets and did not affect validation outcomes.

4.5.3.2 Funding Verification

Budget and Expenditure Summary

The Community Outreach and Engagement category had a total 2025 planned budget of $167.0 thousand against actual expenditures of $223.9 thousand, a 34.1% variance above budget. All four initiatives are OPEX line items; COE_1 and COE_2 together account for the majority of category spend. The category figures are the arithmetic sum of the initiative-level amounts filed in AIR Attachment D.

Initiatives with Significant Variances

All four Community Outreach initiatives exceed ±10% (ranging from +27.1% to +37.3%), each an OPEX overspend with the planned 2025 activities completed. COE_1 and COE_2 carry a dual AIR/DR004 driver (advertising and contracted public-relations costs, plus additional hours from the unplanned SCE PSPS event); COE_3 and COE_4 are small-base collaboration overspends.

Key Trends and Funding Compliance

- COE_1 and COE_2 – together the majority of category spend – carry a dual driver: the AIR advertising and contracted public-relations cost and the BVES_DR004 Item 11 PSPS-driven additional hours. The IE presents both and does not assert a rate movement pending the advertising and contractor invoices.
- COE_3 and COE_4 are small-base collaboration line items where a modest absolute-dollar increase produces a large percentage.
- The unplanned SCE PSPS event is a recurring supplemental driver across COE_1, COE_2, and the Emergency Preparedness category (BVES_DR004 Item 11).

Funding Verification – IE Assessment

The IE finds Community Outreach and Engagement funding adequate to delivered scope. All four initiatives completed their planned 2025 activities; the variances are explained by advertising and public-relations cost, PSPS-driven outreach hours, and small-base collaboration cost rather than funding shortfalls, and the targeted risk reduction is reflected in Table 80's "Satisfied Risk Reduction Goal?" column.

The reportable item the IE carries to the Executive Summary is the COE_1/COE_2 dual-driver substantiation – confirm the advertising and contracted-public-relations cost component and the PSPS-attributable hours against invoices before asserting any rate movement. The IE also notes BVES does not track variance at the initiative level (BVES_DR004 Item 4) and recommends initiative-level variance tracking for 2026–2028.

5. EVALUATION OF QA/QC PROGRAMS

Quality Assurance and Quality Control (QA/QC) are essential in ensuring the thoroughness and reliability of an EC's operations. This section presents a comprehensive assessment of Bear Valley's QA/QC program, utilizing a structured approach based on five key dimensions:

- Roles and Responsibilities
- Quality Culture
- Quality Management System (QMS)
- Quality Inspections and Audits
- QA/QC Technology Adoption

By examining these critical areas, the IE aims to provide a holistic view of the EC's quality practices, highlighting areas of strength, identifying industry-leading best practices, and pinpointing opportunities for enhancement. Each category was scored on a scale ranging from 0-4 and the score demonstrated the EC's maturity in QA/QC implementation: 0 – Not Implemented; 1 – Initiated; 2 – Applied; 3 – Routine; 4 – Mastered. The evaluation framework allows a thorough analysis of how quality is integrated into the EC's structure, culture, systems, and processes.

Roles and Responsibilities – 2 Applied

BVES's Roles & Responsibilities dimension operates at the Applied (Level 2) maturity level. The organization has established defined and documented QA/QC roles with clear accountability mechanisms and formal communication channels, meeting the core requirements of Level 2. However, gaps in organizational integration, leadership engagement depth, and systematic accountability prevent advancement to Level 3 (Routine).

BVES has successfully established defined and documented QA/QC roles that meet Level 2 requirements. Roles and responsibilities are formally identified in the relevant QA/QC procedures, with each procedure document specifying which utility personnel has oversight responsibility for that specific program. This procedural documentation ensures that individuals understand their specific QA/QC responsibilities across the organization's WMP activities. The thoroughness of role definition across multiple QA/QC procedure documents demonstrates that BVES has moved beyond the basic, non-standardized role definitions characteristic of Level 1 and has created a systematic framework where accountability is clearly assigned at the procedural level. Roles were reviewed and updated in 2024, demonstrating that BVES maintains current documentation and periodically reassesses role definitions. The organization has implemented formal accountability mechanisms that ensure individuals are held responsible for their QA/QC duties. Performance metrics and performance reviews are tied directly to WMP metrics, creating measurable accountability for QA/QC outcomes and establishing a direct link between individual performance evaluation and QA/QC responsibilities. This integration of QA/QC accountability into the performance management system ensures that employees recognize their QA/QC duties as core job responsibilities rather than ancillary tasks. BVES has established formal communication channels that promote the flow of QA/QC information throughout the organization.

Communications flow "up and down the traditional reporting chain, or else cross-functionally as needed," creating structured pathways for QA/QC information exchange. Monthly QA/QC reporting to senior leadership at safety and other briefings establishes a regular cadence for executive visibility into quality activities, ensuring that QA/QC information reaches decision-makers with predictable frequency. The small team structure enables direct communication pathways that, while informal in tone, function as formal channels due to their consistent use and organizational expectation. Leadership demonstrates active involvement in defining and supporting QA/QC roles, meeting the Level 2 requirement for leadership engagement. Resources are allocated to QA/QC programs as specified by the WMP, showing that leadership translates regulatory commitments into budgetary support. Organizational leadership participates in QA/QC processes as documented in the procedures, and QA/QC priorities are specified by the WMP and communicated through the organization. This combination of resource allocation, direct participation, and priority communication shows that leadership actively defines and supports QA/QC roles rather than simply acknowledging their importance.

Quality Culture – 1 Initiated

BVES's Quality Culture dimension operates at the Initiated (Level 1) maturity level. The organization demonstrates basic awareness of quality culture elements and has established some foundational practices, but lacks the formalized training programs, systematic feedback mechanisms, and organizational integration of quality values required for Level 2 (Applied) maturity.

BVES has established a foundational quality awareness among its workforce that aligns with Level 1 characteristics. Some employees can explain how their work impacts WMP QA/QC, the consequences of quality failures, and the organization's main quality issues, demonstrating that basic quality awareness exists within the organization. This represents an important baseline understanding that distinguishes BVES from Level 0 where employees cannot explain quality impacts at all. The fact that quality knowledge exists among portions of the workforce indicates that informal knowledge transfer and on-the-job learning have created pockets of quality understanding, even without formal training structures. The organization has created an environment where employees feel comfortable reporting quality failures without fear of retaliation. Employees typically feel comfortable reporting failures to supervisors and managers, and protections against retaliation exist as outlined in state and federal law. This absence of a fear-based reporting culture is critical for quality improvement, as it enables the identification and correction of quality issues before they escalate. The willingness of employees to surface problems demonstrates a level of safety that supports quality culture development. BVES has established basic communication channels for quality-related issues that enable employee participation in quality discussions. Employees can report quality failures or problems and suggest quality improvements directly to supervisors, or alternatively to the company president during semiannual one-on-one meetings. This dual-channel approach provides employees with options for raising quality concerns and ensures that quality information can reach executive leadership directly when necessary. Employees can receive feedback on quality-related submissions from supervisors, creating a basic feedback loop that acknowledges employee contributions to quality improvement.

The semiannual access to executive leadership demonstrates that quality concerns have pathways to the highest organizational levels, even if these pathways are not formalized or frequent.

Quality Management Systems (QMS) – 1 Initiated

BVES's Quality Management System dimension operates at the Initiated (Level 1) maturity level. The organization has made significant progress toward digitization through implementation of iRestore and Kintone platforms for specific WMP activities, and has established standardized processes through documented QA/QC procedures. However, the continued reliance on spreadsheets and paperwork orders for primary QMS operations, lack of full system integration, and absence of advanced analytical capabilities prevent achievement of Level 2 (Applied) maturity. BVES represents an advanced Level 1 organization in transition toward Level 2, having moved well beyond basic paper-based systems but not yet achieving the full digitization and centralization that defines Level 2.

BVES has made substantial progress in digitizing its QMS beyond the basic spreadsheets and standalone databases that characterize early Level 1 maturity. The organization utilizes the iRestore pole app as a QMS platform for pole-related QA/QC since 2023 with approximately 10 users and employs the Kintone app for vegetation management QA/QC. These platform implementations represent investments into dedicated QMS technology designed specifically for quality management purposes, moving beyond general-purpose tools like spreadsheets. The deployment of these systems for the organization's two primary WMP activity categories, grid assets and vegetation management, demonstrates strategic focus on digitizing the highest-volume quality activities and shows commitment to technology quality management. The organization has established standardized QA/QC processes through documentation that provides consistency across initiatives. BVES maintains documented QA/QC procedures covering work order templates, inspection checklists, audit protocols, and corrective action procedures. These documented procedures ensure that QA/QC activities are conducted according to defined protocols rather than ad hoc approaches, providing standardized quality management. Process compliance is ensured through manual review by subject matter experts monthly, creating a regular enforcement cycle that verifies processes are being followed consistently. This combination of documented procedures and monthly SME review establishes systematic process that supports quality outcomes. BVES's implemented QMS platforms provide analytical capabilities that enable performance monitoring and quality insights beyond simple data storage. The systems offer data logging capabilities, standard reporting and queries, dashboards, and alerts. The tree trimming QMS can utilize dashboards to generate quality performance metrics, non-conformance trends, and inspection completion rates, demonstrating that the platforms enable quality analysis and visualization. These dashboard capabilities provide supervisors and managers with visibility into quality activities and performance trends, supporting data-informed decision-making.

Quality Inspections and Audits – 2 Applied

BVES's Quality Inspections/Audits dimension operates at the Applied (Level 2) maturity level. As the utility is located entirely in the HFTD, there is no distinction between routine and high-risk area inspections; due to this the utility conducts many inspections yearly with 100% coverage of

equipment. BVES performs 100% QC of vegetation and asset work orders, utilizes inspection and audit results to make ad hoc corrections, and performs annual SME reviews on inspection quality. However, gaps in systematic use of findings for process improvement and formalized corrective action management prevent advancement to Level 3 (Routine).

BVES has established inspection frequencies that exceed minimum requirements and provide coverage across all WMP activities. QA/QC activities are performed at rates according to WMP and QA/QC policy specifications, with many inspections performed yearly covering 100% of BVES equipment. The organization achieves universal coverage in critical areas, 100% of vegetation management work orders have quality control performed after completion, and quality control by the engineering team is integrated into 100% of work order closing processes. This coverage ensures that all completed work receives quality verification, establishing systematic quality assurance across operations. Since BVES is located entirely in the HFTD, the entire service territory is considered high-risk, and the organization's uniform inspection approach effectively provides frequent inspection of high-risk areas as required by Level 2. The organization utilizes inspection and audit results to make ad hoc corrections, meeting the Level 2 requirement for results-based quality improvement. BVES reviews inspection and audit findings and implements corrections as needed to address identified quality issues. This results-driven approach ensures that quality verification activities translate into tangible quality improvements. The organization's willingness to act on inspection findings demonstrates that the inspection program functions as an active quality management tool rather than a passive compliance activity. BVES has implemented regular SME review processes that assess inspection quality on an annual basis, meeting the Level 2 requirement for at least annual quality assessment. This annual review cadence ensures that the quality of inspection activities themselves receives periodic evaluation, providing a mechanism to identify and address inspection process deficiencies. BVES inspections are performed by company SMEs. The use of company SMEs for inspection activities leverages internal technical knowledge and ensures that inspections are conducted by personnel with deep understanding of BVES systems and operations.

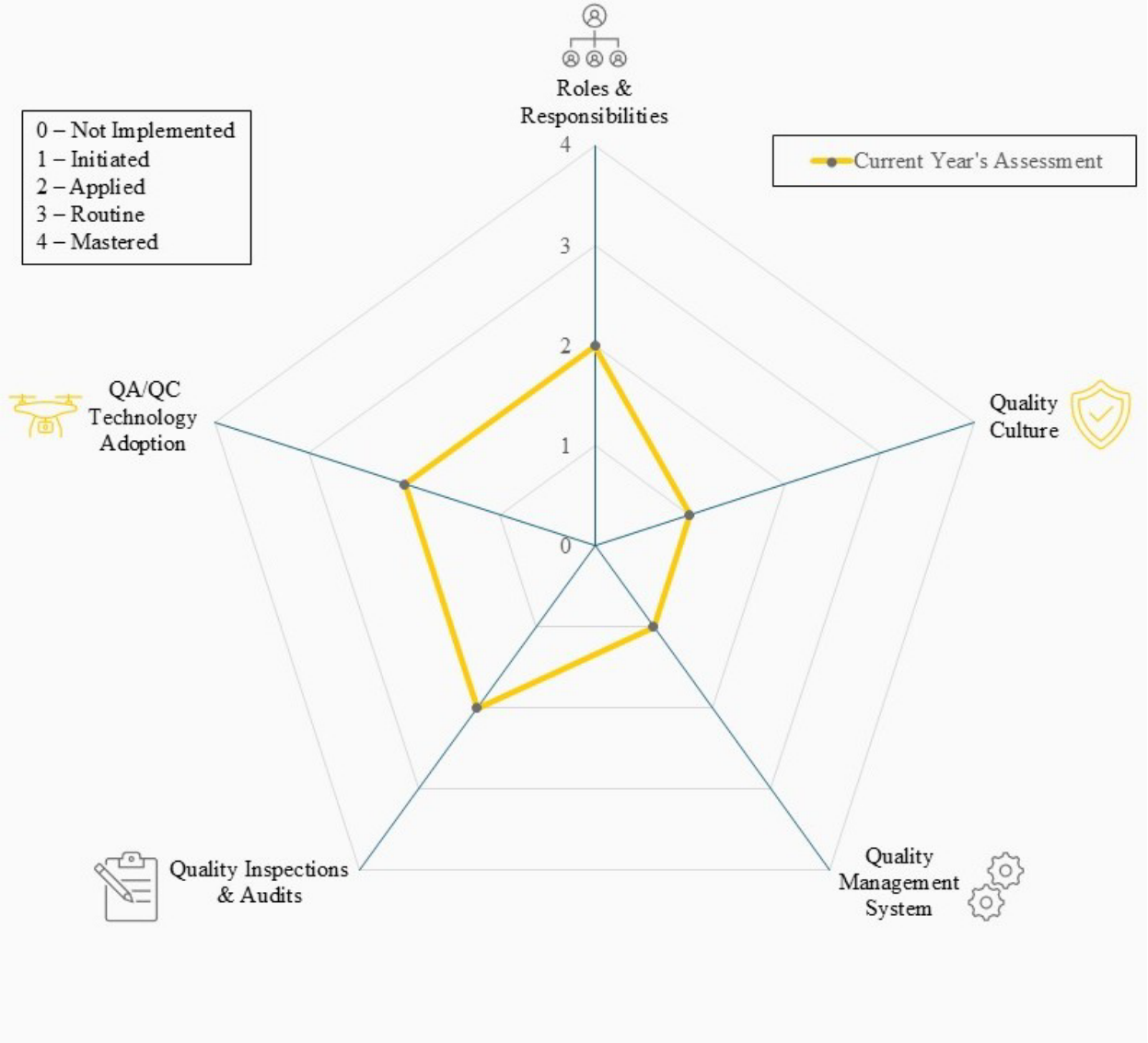
QA/QC Technology Adoption – 2 Applied

BVES's QA/QC Technology Adoption dimension operates at the Applied (Level 2) maturity level. The organization still utilizes manual/paper-based processes and handheld devices but has also implemented drones and LiDAR technology for inspections, partnered with AI/ML-powered inspection tools through AIDash for satellite-based monitoring, and achieved efficiency gains through automated data collection and improved accuracy with high-resolution imagery. However, gaps in systematic measurement of technology benefits, formal technology adoption planning, and continuous improvement culture prevent advancement to Level 3 (Routine).

BVES has successfully implemented drones and basic LiDAR technology for inspections, meeting the core Level 2 requirement for advanced field inspection technology. The organization utilizes drones for WMP QA/QC activities, reducing the need to travel to remote field locations and enabling enhanced efficiency through automated data collection. The deployment of LiDAR technology provides improved accuracy through high-resolution imagery and precise measurements, allowing BVES to conduct inspections that would be difficult or time-consuming

using traditional ground-based methods. The organization has established a partnership with AIDash to leverage satellite-based sensors and AI/ML-powered inspection tools, as specified in the WMP. The integration of AI/ML-powered inspection tools demonstrates that BVES is utilizing advanced analytics to process inspection data and identify quality issues, moving beyond purely manual data review. The combination of satellite sensors and AI/ML analysis provides BVES with inspection capabilities that enhance both the efficiency and accuracy of quality assessments, particularly for vegetation management activities across the entire service territory. BVES has achieved efficiency gains through technology adoption that reduce inspection time and travel requirements. The use of drones eliminates or reduces the need to travel to remote field locations, saving time and resources while enabling more frequent inspections of difficult-to-access areas. Automated data collection through drones, LiDAR, and satellite sensors reduces the manual effort required for inspections and minimizes the potential for human error in data recording. High-resolution imagery and precise measurements from these technologies improve inspection accuracy compared to visual inspections alone, enabling inspectors to identify defects or conditions that might be missed through traditional methods. The organization maintains awareness of emerging QA/QC technologies through participation in industry events and collaboration with technology vendors and other utilities. BVES employees attend industry conferences such as CEATI, Distributech, and IEEE, providing exposure to emerging technologies and best practices. Collaboration with other California utilities through Joint IOU meetings enables knowledge sharing about technology adoption experiences and lessons learned. Partnerships with technology vendors and universities provide access to emerging solutions and research developments.

Figure 13: QA/QC Maturity Sunburst Chart



6. CONCLUSION

BVES has completed implementation of its 2025 Wildfire Mitigation Plan across 74 distinct initiatives spanning five program categories: Grid Design, Operations, and Maintenance; Vegetation Management and Inspections; Situational Awareness and Forecasting; Emergency Preparedness; and Community Outreach and Engagement. The Independent Evaluator's comprehensive review, utilizing field verification, statistical sampling, documentation review, and data validation methodologies consistent with Energy Safety requirements, determined that 57 initiatives (77%) were validated, 10 initiatives (14%) were not validated, and 7 initiatives (9%) were not applicable for the 2025 reporting period. Overall, BVES demonstrated strong performance in 2025 WMP implementation, with substantial investment and achievement across grid hardening, vegetation management, situational awareness, emergency preparedness, and community engagement activities.

Grid hardening activities substantially exceeded targets, with the Covered Conductor Replacement Project achieving 152 percent of its 5.10 circuit-mile target through installation of 7.73 circuit miles, the Distribution Pole Replacements and Reinforcements initiative completing 123 poles against a 100-pole target for a 122 percent validation rate, and the Evacuation Route Hardening Project installing wire wrap mesh on 851 wood poles against a 500-pole target for a 168 percent validation rate. Grid automation initiatives achieved 100 percent validation across substation automation, switch and field device automation, and capacitor bank upgrades, demonstrating successful technology integration and SCADA connectivity. Vegetation management activities, including fall-in mitigation achieving 186 percent of target through 164 tree remediations and clearance work exceeding 72 circuit miles with 91.4 circuit miles completed, reflected effective hazard identification and remediation. Community outreach and engagement initiatives substantially exceeded all targets, with 1,184 public outreach events conducted against a 360-event target and 121 work group and conference participations against a 15-participation target, demonstrating strong public communication and stakeholder coordination. Situational awareness technologies, including 15 fault indicator installations, online diagnostic system deployment on the Erwin 4kV circuit, and GreenGrid iSIU camera installations, were successfully deployed and integrated into BVES's monitoring infrastructure.

However, 10 initiatives did not achieve validation thresholds and require corrective action. Five Grid Design initiatives were not validated, including the Bear Valley Solar Energy Project and Energy Storage Project, both delayed to 2027 despite CPUC approval; the Detailed Inspection Program, which reported 53 circuit miles but documentation supported only 49 circuit miles; LiDAR Inspections, which reported 205 circuit miles but documentation supported only 187 circuit miles; and the Open Work Orders initiative, which lacked sufficient documentation of GO 95 Rule 18 compliance. Three vegetation management initiatives, Detailed Inspections, LiDAR Inspections, and Substation Defensible Space, fell short of targets due to circuit mileage shortfalls or incomplete substation coverage. Two Emergency Preparedness initiatives were not validated, Preparedness and Planning for Service Restoration, due to a discrepancy in plan update documentation and missing service restoration plan copies, and Customer Support in Wildfire & PSPS Emergencies, due to failure to complete the required annual review by the April 2025

deadline. Additionally, data quality issues were identified across multiple initiatives, including discrepancies between reported and documented circuit miles, GPS coordinate mismatches, and pole tag inconsistencies between field assets and database records.

To strengthen future WMP implementation, BVES should: prioritize implementation of data reconciliation processes to ensure consistency between GIS records, ResourceKeeper database entries, and field asset identifications; enhance documentation practices to include revision histories and explicit linkages between training exercises and plan updates; verify that reported circuit miles and inspection locations align with actual work performed prior to submission of annual reports; and provide explicit documentation explaining the status of all substations subject to vegetation management initiatives. The Independent Evaluator concludes that BVES has made meaningful progress in implementing its 2025 Wildfire Mitigation Plan and has demonstrated the operational and technical capacity to execute complex grid hardening, vegetation management, and emergency preparedness initiatives. Continued focus on data accuracy, timeline management, and documentation practices will support sustained performance and achievement of Energy Safety validation thresholds in future WMP implementation cycles.

7. ATTACHMENTS

7.1 CATALOG OF INITIATIVES

7.2 DATA REQUESTS

7.3 SME INTERVIEWS

7.4 PICTURES OF NON-CONFORMANCE