

Via Electronic Mail

August 10, 2026

Forest Kaser, Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814
Forest.Kaser@energysafety.ca.gov
Docket #2026-IE

RE: BVES Comments on BVES 2025 Wildfire Mitigation Plan Independent Evaluator Annual Report on Compliance

Dear Director Forest Kaser:

In accordance with the Office of Energy Infrastructure Safety's ("Energy Safety") Opportunity for Public Comment on 2025 Wildfire Mitigation Plan Independent Evaluator Annual Report on Compliance of July 1, 2026, the letter is submitted commenting on the draft Bear Valley Electric Service, Inc. ("BVES") 2025 Wildfire Mitigation Plan Independent Evaluator Annual Report on Compliance prepared by Bureau Veritas North America, Inc. ("BVNA").

Pages 14-16 of the documentation by BVNA states the following recommendations with BVES responses:

- 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.

Response:

In regards to GD_25 and VM_1, BVES is aware that the previous tracking system findings identified certain technical issues, and that BVES has been actively working to resolve those issues. BVES is in the process of implementing system updates that are expected to address the IE's concerns regarding the lack of available data needed to validate these initiatives.



In regards to GD_29 and VM_4, the LiDAR contractor performs inspection of all 205 overhead circuit miles per BVES contract with contractor. Due to the large size of the raw dataset, BVES provided a database containing all identified findings. If a circuit does not appear in the database, it does not mean it was not inspected or overlooked, but rather that no findings were identified during the inspection. If IE had any concerns, BVES was available for further discussion throughout the review process, including the SME interview regarding these initiatives. BVES also offered to provide additional documentation to support these initiatives. BVES continues to work with its contractor to identify improved solutions and support the successful completion of these initiatives.

In regards to VM_11, please see the attached Village Substation inspection record for September ‘Village_09.pdf’, including the call for weed abatement.

- 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.

Response:

In regards to GD_36, BVES is aware that the previous tracking system had technical issues, and that BVES has been actively working on a resolution. System updates are expected to address the concerns identified by the IE regarding “lack of available data to validate these initiatives” and improve data availability moving forward.

- 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.

Response: As part of tracking system updates, BVES is working to improve asset identification across BVES GIS systems and in the field, including via digitization of new work orders, to reduce errors from data entry going forward. However, although BVES has implemented improvements that reduce the error rate, BVES does not consider it feasible at this time to fully verify every historic field asset prior to the next IE cycle. Lastly, please note that ResourceKeeper is a contractor-managed system with its own asset identification system and historical data records. As a result, the data maintained within ResourceKeeper may not always align with current field updates due to differences in system configurations.

- 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.

Response: BVES will be resubmitting an update to OEIS on 2025 EC AIR attachment. Please see attached documentation “2025 EC AIR Attachment D” for updates per your request. Per attachment, IE will verify records in Table 6 is the Initiative Summary Table for Grid Design, Operations, and Maintenance in the IE AIR (TN18315) and issue an errata to 2026 IE report.

- 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.

Response: BVES will consider IE recommendations.



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- 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).

Response: BVES will consider IE recommendations.

CONCLUSION

BVES appreciates the opportunity to submit this response to the IE Report prepared by Bureau Veritas North America, Inc. (BVNA) and respectfully requests that Office of Energy Infrastructure Safety and the IE take these comments into account when reviewing and finalizing the report.

Sincerely,

/s/ Paul Marconi

Paul Marconi

President, Treasurer, & Secretary

Paul.Marconi@bvesinc.com

Attachment:

2025 EC AIR ATTACHMENT D

Utility Initiative Tracking ID	Utility Initiative Name	2025 Forecast CAPEX (\$000)	2025 Forecast OPEX (\$000)	2025 Actuals CAPEX (\$000)	2025 Actuals OPEX (\$000)	CAPEX (\$000) Variance Overrun / (Underrun)	CAPEX (%) Variance Overrun / (Underrun)	OPEX (\$000) Variance Overrun / (Underrun)	OPEX (%) Variance Overrun / (Underrun)	Variance Drivers (Results +/- 10%)
COE_1	Public outreach and education awareness program	\$0.0	\$95.5	\$0.0	\$131.1	\$0.0	NA	\$35.6	37.3%	OPEX overrun. Higher than estimated costs of advertising and contracted public relations services drove this cost higher than forecasted.
COE_2	Engagement with access and functional needs populations	\$0.0	\$31.8	\$0.0	\$41.6	\$0.0	NA	\$9.8	30.8%	OPEX overrun. Higher than estimated costs of advertising and contracted public relations services drove this cost higher than forecasted.
COE_3	Collaboration on local wildfire mitigation planning	\$0.0	\$24.0	\$0.0	\$30.5	\$0.0	NA	\$6.5	27.1%	OPEX overrun. Costs were higher than estimated to due more labor hours dedicated to this effort. All necessary activities planned for 2025 were achieved. This budget item is small (\$24 thousand); therefore, it does not take much expense to significantly cause a cost variance.
COE_4	Best practice sharing with other utilities	\$0.0	\$15.7	\$0.0	\$20.7	\$0.0	NA	\$5.0	31.8%	OPEX overrun. Costs were higher than estimated to due more labor hours dedicated to this effort. All necessary activities planned for 2025 were achieved. This budget item is small (\$15.7 thousand); therefore, it does not take much expense to significantly cause a cost variance.
EP_1	Emergency preparedness plan	\$0.0	\$5.0	\$0.0	\$6.6	\$0.0	NA	\$1.6	32.0%	OPEX overrun. Costs were higher than estimated to due more labor hours dedicated to this effort. All necessary activities planned for 2025 were achieved. This budget item is small (\$5 thousand); therefore, it does not take much expense to significantly cause a cost variance.
EP_2	External collaboration and coordination	\$0.0	\$22.7	\$0.0	\$30.8	\$0.0	NA	\$8.1	35.7%	OPEX overrun. Costs for attending Joint IOU workshops and wildfire mitigation related conferences were higher than estimated. This budget item is small (\$22 thousand); therefore, it does not take much expense to significantly cause a cost variance.
EP_3	Public emergency communication strategy	\$0.0	\$4.4	\$0.0	\$5.9	\$0.0	NA	\$1.5	34.1%	OPEX overrun. Costs were higher than estimated to due more labor hours dedicated to this effort. All necessary activities planned for 2025 were achieved. This budget item is small (\$4.4 thousand); therefore, it does not take much expense to significantly cause a cost variance.
EP_4	Preparedness and planning for service restoration	\$0.0	\$6.0	\$0.0	\$7.9	\$0.0	NA	\$1.9	31.7%	OPEX overrun. Costs were higher than estimated to due more labor hours dedicated to this effort. All necessary activities planned for 2025 were achieved. This budget item is small (\$6 thousand); therefore, it does not take much expense to significantly cause a cost variance.
EP_5	Customer support in wildfire and PSPS emergencies	\$0.0	\$3.7	\$0.0	\$4.8	\$0.0	NA	\$1.1	29.7%	OPEX overrun. Costs were higher than estimated to due more labor hours dedicated to this effort. All necessary activities planned for 2025 were achieved. This budget item is small (\$3.7 thousand); therefore, it does not take much expense to significantly cause a cost variance.
GD_1	Covered Conductor Replacement Project	\$1,840.6	\$0.0	\$5,572.7	\$0.0	\$3,732.1	202.8%	\$0.0	NA	CAPEX overrun. BVES exceeded annual target. The annual target was purposely exceeded due to system conditions permitting additional project work.
GD_2	Radford Line Replacement Project	\$0.0	\$0.0	\$117.1	\$0.0	\$117.1	100.0%	\$0.0	NA	CAPEX overrun. This project was completed in November 2024 and the budget for 2025 was \$0.0. The CAPEX expenses incurred in 2025 were due to invoices received in January 2025.
GD_3	Minor Undergrounding Upgrades Projects	\$301.2	\$0.0	\$172.6	\$0.0	-\$128.6	-42.7%	\$0.0	NA	CAPEX underrun. UG projects that BVES engages in are generally driven by the customer or local government and are generally new facilities. In 2025 and 2024, they were less than budget. In 2023, minor UG projects was overrun by \$524.9 thousand. Year-to-year variations are high due to the projects being customer and local government driven.
GD_4	Covered Conductor Replacement Project	\$788.8	\$0.0	\$2,388.3	\$0.0	\$1,599.5	202.8%	\$0.0	NA	CAPEX overrun BVES exceeding annual target. The annual target was purposely exceeded due to system conditions permitting additional project work.
GD_5	Radford Line Replacement Project	\$0.0	\$0.0	\$50.2	\$0.0	\$50.2	100.0%	\$0.0	NA	CAPEX overrun. This project was completed in November 2024 and the budget for 2025 was \$0.0. The CAPEX expenses incurred in 2025 were due to invoices received in January 2025.
GD_6	Evacuation Route Hardening Project	\$794.1	\$0.0	\$540.4	\$0.0	-\$253.7	-31.9%	\$0.0	NA	CAPEX underrun. Annual target for 2025 was achieved (actually exceeded) at lower than budgeted. Labor was less than originally estimated.
GD_7	Transmission pole/tower replacements and reinforcements	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	NA	\$0.0	NA	NA - BVES does not own or operate transmission assets.
GD_8	Traditional overhead hardening	\$803.3	\$0.0	\$1,011.5	\$0.0	\$208.2	25.9%	\$0.0	NA	CAPEX overrun. CPAEX Overrun was due to additional overhead hardening work being conducted than estimated. In addition to resolving asset inspection findings, BVES has been proactively replacing non-exempt equipment (e.g. arresters) and splices.
GD_9	Emerging grid hardening technology installations and pilots	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	NA	\$0.0	NA	NA - BVES does not have any pilot projects or programs for novel grid hardening technology.
GD_10	Bear Valley Solar Energy Project	\$13,578.4	\$0.0	\$702.2	\$0.0	-\$12,876.2	-94.8%	\$0.0	NA	CAPEX underrun. In 2025, BVES was waiting for CPUC approval which was not approved until December 18, 2025. BVES was unable to continue next step of of Bear Valley Solar Energy Project process.
GD_11	Energy Storage Project	\$10,342.0	\$0.0	\$32.5	\$0.0	-\$10,309.5	-99.7%	\$0.0	NA	CAPEX underrun. In 2025, BVES was waiting for CPUC approval which was not approved until December 18, 2025. Afterwards, BVES issued a notice to proceed to its developer for the project.
GD_12	Substation Automation	\$640.2	\$0.0	\$364.4	\$0.0	-\$275.8	-43.1%	\$0.0	NA	CAPEX underrun. Annual target was achieved. Two substations automation projects were accomplished as part of rebuilding those substations. The cost of automating those substations was included in the rebuild project budget.
GD_13	Switch and Field Device Automation	\$640.2	\$0.0	\$1,370.6	\$0.0	\$730.4	114.1%	\$0.0	NA	CAPEX overrun. Overrun was due to higher costs than estimated for the switches and communications equipment and higher labor costs (more labor hours) than estimated to achieve proper connectivity with the switches to the SCADA system. Additionally, BVES hired a 3rd party to test the switches once received from the vendor prior to installing the switches as necessary quality control step; this had not been planned in the original budget.
GD_14	Capacitor Bank Upgrade Project	\$311.5	\$0.0	\$594.1	\$0.0	\$282.6	90.7%	\$0.0	NA	CAPEX overrun. Overrun was due to higher costs than estimated for the capacitor banks and communications equipment and higher labor costs (more labor hours) than estimated to achieve proper connectivity with the capacitor banks to the SCADA system. Additionally, BVES hired a 3rd party to test the capacitor banks once received from the vendor prior to installing the capacitor banks as necessary quality control step; this had not been planned in the original budget.

Utility Initiative Tracking ID	Utility Initiative Name	2025 Forecast CAPEX (\$000)	2025 Forecast OPEX (\$000)	2025 Actuals CAPEX (\$000)	2025 Actuals OPEX (\$000)	CAPEX (\$000) Variance Overrun / (Underrun)	CAPEX (%) Variance Overrun / (Underrun)	OPEX (\$000) Variance Overrun / (Underrun)	OPEX (%) Variance Overrun / (Underrun)	Variance Drivers (Results +/- 10%)
GD_15	Fuse TripSaver Automation	\$133.6	\$0.0	\$400.4	\$0.0	\$266.8	199.7%	\$0.0	NA	CAPEX overrun. Overrun was due to higher costs than estimated for the communications equipment and higher labor costs (more BVES and contracted labor hours) than estimated to achieve proper connectivity with the Fuse TripSavers to the SCADA system.
GD_16	Server Room	\$0.0	\$0.0	\$42.6	\$0.0	\$42.6	100.0%	\$0.0	NA	CAPEX overrun. This project, which was planned for 2023 and 2024, had additional equipment and labor costs that were carried over into 2025. The CAPEX budget for 2025 was \$0.0.
GD_17	Distribution Management Center	\$0.0	\$0.0	\$11.9	\$0.0	\$11.9	100.0%	\$0.0	NA	CAPEX overrun. This project, which was planned for 2024, had additional equipment and labor costs that were carried over into 2025. The CAPEX budget for 2025 was \$0.0.
GD_18	Line removals (in HFTD)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	NA	\$0.0	NA	NA
GD_19	Tree Attachment Removal Project	\$592.7	\$0.0	\$861.9	\$0.0	\$269.2	45.4%	\$0.0	NA	CAPEX overrun. Higher material and labor costs resulted in the CAPEX spend being higher than projected.
GD_20	Other grid topology improvements to mitigate or reduce PSPS events	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	NA	\$0.0	NA	Less than 10% variance.
GD_21	BVPP Phase 4 Upgrade Project	\$0.0	\$0.0	\$79.5	\$0.0	\$79.5	100.0%	\$0.0	NA	CAPEX overrun. This project, which was planned for 2024, had additional equipment and labor costs that were carried over into 2025. The CAPEX budget for 2025 was \$0.0.
GD_22	Partial Safety and Technical Upgrades to Maltby Substation	\$1,777.5	\$0.0	\$1,896.6	\$0.0	\$119.1	6.7%	\$0.0	NA	Less than 10% variance.
GD_23	Safety and Technical Upgrades to Lake Substation	\$0.0	\$0.0	\$1,374.5	\$0.0	\$1,374.5	100.0%	\$0.0	NA	CAPEX Overrun. Due to longer substation equipment leadtime, BVES ordered substation equipment in 2025 to accommodate the construction schedule in 2026.
GD_25	Detailed Inspections	\$0.0	\$14.3	\$0.0	\$31.3	\$0.0	NA	\$17.0	118.9%	OPEX overrun. Labor hours dedicated to this initiative were higher than forecasted. Annual was target achieved.
GD_26	Patrol Inspections	\$0.0	\$33.4	\$0.0	\$73.0	\$0.0	NA	\$39.6	118.6%	OPEX overrun. Labor hours dedicated to this initiative were higher than forecasted. Annual was target achieved.
GD_27	UAV Thermography	\$0.0	\$74.1	\$0.0	\$61.3	\$0.0	NA	(\$12.8)	-17.3%	OPEX underrun. BVES was able to contract the work for lower cost than projected. Intended scope of work and annual target was achieved.
GD_28	UAV HD Photography/Videography	\$0.0	\$74.1	\$0.0	\$59.5	\$0.0	NA	(\$14.6)	-19.7%	OPEX underrun. BVES was able to contract the work for lower cost than projected. Intended scope of work and annual target was achieved.
GD_29	LIDAR Inspection	\$0.0	\$76.2	\$0.0	\$85.4	\$0.0	NA	\$9.2	12.0%	OPEX overrun. Labor hours dedicated to this initiative were higher than forecasted. Annual was target achieved.
GD_30	3rd Party Ground Patrol	\$0.0	\$61.5	\$0.0	\$16.4	\$0.0	NA	(\$45.1)	-73.3%	OPEX underrun. BVES was able to contract the work for lower cost than projected. Intended scope of work and annual target was achieved.
GD_31	Intrusive Pole Inspections	\$0.0	\$19.7	\$0.0	\$38.4	\$0.0	NA	\$18.7	94.9%	OPEX overrun. Labor hours dedicated to this initiative were higher than forecasted. Annual was target achieved.
GD_32	Substation Inspections	\$0.0	\$291.7	\$0.0	\$335.2	\$0.0	NA	\$43.5	14.9%	OPEX overrun. Costs were higher than estimated due to more labor hours dedicated and contracted portion of substation inspections (equipment testing) was achieved at a higher cost than estimated. Annual target was achieved.
GD_33	Equipment maintenance and repair	\$0.0	\$1,105.4	\$0.0	\$1,352.2	\$0.0	NA	\$246.8	22.3%	OPEX overrun. Costs were higher than estimated due to more labor hours dedicated to conducting equipment maintenance and repair in response to inspection findings and storm damage.
GD_34	Asset management and inspection enterprise system(s)	\$0.0	\$59.4	\$0.0	\$46.0	\$0.0	NA	(\$13.4)	-22.6%	OPEX underrun. Costs associated with updating and maintaining the asset management and inspection enterprise systems(s) were lower than forecasted due to lower than estimated labor costs.
GD_35	Asset Quality assurance / quality control	\$0.0	\$20.9	\$0.0	\$27.6	\$0.0	NA	\$6.7	32.1%	OPEX overrun. Labor was more than estimated. All necessary activities planned for 2025 were achieved.
GD_36	Asset Open work orders	\$0.0	\$18.3	\$0.0	\$24.2	\$0.0	NA	\$5.9	32.2%	OPEX overrun. Labor was more than estimated. All necessary activities planned for 2025 were achieved.
GD_37	Equipment Settings to Reduce Wildfire Risk	\$0.0	\$5.2	\$0.0	\$6.9	\$0.0	NA	\$1.7	32.7%	OPEX overrun. Labor was more than estimated. All necessary activities planned for 2025 were achieved. This budget item is small (\$5.2 thousand); therefore, it does not take much expense to significantly cause a cost variance.
GD_38	Grid Response Procedures and Notifications	\$0.0	\$9.2	\$0.0	\$12.1	\$0.0	NA	\$2.9	31.5%	OPEX overrun. Labor was more than estimated. All necessary activities planned for 2025 were achieved. his budget item is small (\$9.2 thousand); therefore, it does not take much expense to significantly cause a cost variance.
GD_39	Personnel Work Procedures and Training in Conditions of Elevated Fire Risk	\$0.0	\$3.9	\$0.0	\$5.2	\$0.0	NA	\$1.3	33.3%	OPEX overrun. Labor was more than estimated. All necessary activities planned for 2025 were achieved. This budget item is small (\$3.9 thousand); therefore, it does not take much expense to significantly cause a cost variance.
GD_40	Asset Workforce Planning	\$0.0	\$6.5	\$0.0	\$8.6	\$0.0	NA	\$2.1	32.3%	OPEX overrun. Labor was more than estimated. All necessary activities planned for 2025 were achieved.
RMA_1	Technosylva Contractor. Program implemented and ongoing.	\$0.0	\$84.8	\$0.0	\$378.4	\$0.0	NA	\$293.6	346.2%	OPEX overrun. Additional contracted expenses were higher than initially planned due to BVES working with contractor (Direxyn) to further develop Utility Risk Model.
SAF_1	Advanced weather monitoring and weather stations	\$0.0	\$7.5	\$0.0	\$57.4	\$0.0	NA	\$49.9	665.3%	OPEX overrun. Labor and replacement parts to maintain the weather stations was higher than estimated. All weather stations were properly serviced.
SAF_2	Install Fault Indicators	\$0.0	\$0.0	\$279.0	\$0.0	\$279.0	100.0%	\$0.0	NA	CAPEX overrun. This project, which was planned for 2023 and 2024, had additional equipment and labor costs that were carried over into 2025. The CAPEX budget for 2025 was \$0.0.
SAF_3	Online Diagnostic System	\$75.9	\$0.0	\$72.7	\$0.0	-\$3.2	-4.2%	\$0.0	NA	Less than 10% variance.
SAF_4	HD ALERTWildfire Cameras	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	NA	\$0.0	NA	Less than 10% variance.

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SAF_5	Weather forecasting	\$0.0	\$67.5	\$0.0	\$79.4	\$0.0	NA	\$11.9	17.6%	OPEX overrun. Contracted expenses were higher than initially planned.
SAF_6	Fire potential index	\$0.0	\$50.9	\$0.0	\$64.8	\$0.0	NA	\$13.9	27.3%	OPEX overrun. Contracted expenses were higher than initially planned.
ST_1	Environmental compliance and permitting	\$0.0	\$26.2	\$0.0	\$34.5	\$0.0	NA	\$8.3	31.7%	OPEX overrun. Permitting costs were higher than anticipated, which was related to the overall increase project work conducted in 2025.
VM_1	Detailed Inspections	\$0.0	\$14.3	\$0.0	\$31.3	\$0.0	NA	\$17.0	118.9%	OPEX overrun. Labor hours dedicated to this initiative were higher than forecasted. Annual was target achieved.
VM_2	Patrol Inspections	\$0.0	\$33.4	\$0.0	\$73.0	\$0.0	NA	\$39.6	118.6%	OPEX overrun. Labor hours dedicated to this initiative were higher than forecasted. Annual was target achieved.
VM_3	UAV HD Photography/Videography	\$0.0	\$74.1	\$0.0	\$59.5	\$0.0	NA	(\$14.6)	-19.7%	OPEX underrun. BVES was able to contract the work for lower cost than projected. Intended scope of work and annual target was achieved.
VM_4	LIDAR Inspection	\$0.0	\$76.2	\$0.0	\$85.4	\$0.0	NA	\$9.2	12.1%	OPEX overrun. Labor hours dedicated to this initiative were higher than forecasted. Annual was target achieved.
VM_5	3rd Party Ground Patrol	\$0.0	\$61.5	\$0.0	\$16.4	\$0.0	NA	(\$45.1)	-73.3%	OPEX underrun. BVES was able to contract the work for lower cost than projected. Intended scope of work and annual target was achieved.
VM_6	Substation Inspections	\$0.0	\$4.5	\$0.0	\$5.1	\$0.0	NA	\$0.6	13.3%	OPEX overrun. Labor was more than estimated. All necessary activities planned for 2025 were achieved. This budget item is small (\$4.5 thousand); therefore, it does not take much expense to significantly cause a cost variance.
VM_7	Pole clearing	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	NA	\$0.0	NA	Less than 10% variance.
VM_8	Wood and slash management	\$0.0	\$507.2	\$0.0	\$519.4	\$0.0	NA	\$12.2	2.4%	Less than 10% variance.
VM_9	Clearance	\$0.0	\$2,157.6	\$0.0	\$2,205.3	\$0.0	NA	\$47.7	2.2%	Less than 10% variance.
VM_10	Fall-in mitigation	\$0.0	\$342.2	\$0.0	\$350.8	\$0.0	NA	\$8.6	2.5%	Less than 10% variance.
VM_11	Substation defensible space	\$0.0	\$15.9	\$0.0	\$9.7	\$0.0	NA	(\$6.2)	-39.0%	OPEX underrun. BVES was able to contract the work for lower cost than projected. Intended scope of work and annual target was achieved.
VM_12	High-risk species	\$0.0	\$342.2	\$0.0	\$350.8	\$0.0	NA	\$8.6	2.5%	Less than 10% variance.
VM_13	Fire-resilient rights-of-way	\$0.0	\$14.9	\$0.0	\$17.9	\$0.0	NA	\$3.0	20.1%	OPEX overrun. Costs were higher than estimated. All necessary activities planned for 2025 were achieved. This budget item is small (\$14.9 thousand); therefore, it does not take much expense to significantly cause a cost variance.
VM_14	Emergency response vegetation management	\$0.0	\$29.7	\$0.0	\$37.7	\$0.0	NA	\$8.0	26.9%	OPEX overrun. Costs were higher than estimated due to more than normal emergency response activities.
VM_15	Vegetation management enterprise system	\$0.0	\$22.3	\$0.0	\$19.7	\$0.0	NA	(\$2.6)	-11.7%	OPEX underrun. Costs associated with updating and maintaining the vegetation management enterprise systems(s) were lower than forecasted due to lower than estimated labor costs.
VM_16	Vegetation Management Quality assurance / quality control	\$0.0	\$52.5	\$0.0	\$68.8	\$0.0	NA	\$16.3	31.0%	OPEX overrun. Costs were higher than estimated due to more labor hours dedicated to this effort.
VM_17	Vegetation Management Open work orders	\$0.0	\$36.8	\$0.0	\$46.0	\$0.0	NA	\$9.2	25.0%	OPEX overrun. Costs were higher than estimated due to more labor hours dedicated to this effort.
VM_18	Vegetation Management Workforce planning	\$0.0	\$6.5	\$0.0	\$8.6	\$0.0	NA	\$2.1	32.3%	OPEX overrun. Costs were higher than estimated due to more labor hours dedicated to this effort. This budget item is small (\$6.5 thousand); therefore, it does not take much expense to significantly cause a cost variance.
VM_19	AI/Dash	\$0.0	\$40.0	\$0.0	\$40.0	\$0.0	NA	\$0.0	0.0%	Less than 10% variance.
WMSD_1	Wildfire Mitigation Strategy Development	\$0.0	\$31.4	\$0.0	\$41.4	\$0.0	NA	\$10.0	31.8%	OPEX overrun. Costs were higher than estimated due to more labor hours dedicated to this effort.

Attachment:
Village_09

Attachment A: BVES Substation Inspection Sheet

BVES

Electric Operations

Date Sept 3, 2025 STATION: Village
 Inspector Name RAY HAZELTON Time of Reading: 945
 Ambient Temp: 70°

SUBSTATION REPORT AND INSPECTION SHEET

TRANSFORMER	TEMPERATURE		OIL LEVEL	GAS PRESSURE
	PRESENT	MAXIMUM		
E			<u>OK</u>	<u>-1.75</u>
W 946002285	<u>38</u>	<u>38</u>	<u>OK</u>	<u>+0</u>

VOLTAGE REGULATORS	POSITION INDICATOR	INDICATOR RANGE		PRESENT COUNTER	PREVIOUS COUNTER	OIL
		LOW	HIGH			
S-W 949103838	<u>N</u>	<u>L4</u>	<u>R12</u>	<u>228920</u>	<u>227649</u>	<u>OK</u>
M-W 959100053	<u>R2</u>	<u>L4</u>	<u>R12</u>	<u>195207</u>	<u>193509</u>	<u>OK</u>
N-W 949103827	<u>L2</u>	<u>L4</u>	<u>R12</u>	<u>262633</u>	<u>261247</u>	<u>OK</u>
S-E 959100052	<u>L4</u>	<u>L6</u>	<u>R11</u>	<u>219584</u>	<u>218221</u>	<u>OK</u>
M-E 959100054	<u>L2</u>	<u>L4</u>	<u>R12</u>	<u>249587</u>	<u>247953</u>	<u>OK</u>
N-E 959100051	<u>L4</u>	<u>L8</u>	<u>R12</u>	<u>239253</u>	<u>236332</u>	<u>OK</u>

PREVIOUS COUNTER IS MONTHLY CYCLE NUMBER

CIRCUIT BREAKERS	Present Counter	Previous Counter	PEAK / CURRENT AMPS				BATTERY	
			GND	1-2	3-4	5-6	NO LOAD	LOAD
Boulder CB100	<u>25</u>	<u>23</u>	<u>86 41</u>	<u>331 135</u>	<u>346 104</u>	<u>302 126</u>	<u>26.8</u>	<u>26.1</u>
Harnish CB120	<u>25</u>	<u>23</u>	<u>94 24</u>	<u>57 36</u>	<u>50 18</u>	<u>77 18</u>	<u>26.8</u>	<u>26.1</u>
Lagunita CB140	<u>20</u>	<u>18</u>	<u>71 21</u>	<u>306 193</u>	<u>342 181</u>	<u>331 176</u>	<u>26.7</u>	<u>26.0</u>

PREVIOUS COUNTER IS MONTHLY CYCLE NUMBER

METERING	KW	KWHR
Boulder	<u>.96</u>	<u>336.89</u>
Harnish	<u>.198</u>	<u>634.71</u>
Lagunita	<u>1.19</u>	<u>400.48</u>

NOTES:

Weeds
abatement
9-9-2025

Attachment A: BVES Substation Inspection Sheet

AREA APPEARANCE:

☒	Area Fence
☒	Warning Signs
☒	Weeds & Trash <i>weeds</i>
☒	Neat and clean

METERING:

☒	Cabinets condensation, insects, etc.
☒	Foundation condition
☒	Instrument Transformers
☒	Paint conditions or rust

TRANSFORMERS:

☒	Damaged bushings
☒	Oil leaks / Oil level
☒	Continuity of ground connections
☒	Foundation condition
☒	Paint conditions or rust
☒	Spare fuses on hand

OTHER:

☒	Fire Extinguisher
☒	Bus - connectors, conductors, etc.
☒	Paint conditions or rust
☒	Ground grid, or grounding
☐	Other:
☐	

VOLTAGE REGULATORS

☒	Damaged Bushings
☒	Oil leaks / oil level
☒	Continuity of ground connections
☒	Paint conditions or rust
☒	Operations check
☒	Foundation condition
☒	Arrester
☒	Control cabinets condition
☒	Spare panel fuses
☐	Other:
☐	

NOTES FOR ITEMS NEEDING ATTENTION:

Transformers:
Voltage Regulators:
Reclosure & auto switches
Metering:
Other:

RECLOSURER & AUTO SWITCHES:

☒	Damaged Bushings
☒	Oil Leaks
☒	Foundaton condition
☒	Paint conditions or rust
☒	Control cabinets condition
☒	Spare panel fuses
☐	Other:
☐	

Inspector Signature

Date

9-3-2025