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A Subsidiary of American States Water Company

Via Electronic Mail

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Caroline Thomas Jacobs, Director
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Subject: Response to Comments of the Public Advocates Office, Green Power Institute, and the California Department of Fish and Wildlife on Bear Valley Electric Service, Inc. 2022 Wildfire Mitigation Plan Update
Docket: 2022-WMPs

Dear Ms. Jacobs:

Pursuant to the Office of Energy Infrastructure Safety (“Energy Safety”) 2022 Wildfire Mitigation Plan Guidelines of December 15, 2021, Bear Valley Electric Service, Inc. (“BVES” or “Bear Valley”) submits its responses to the Public Advocates Office (“Cal Advocates”), Green Power Institute (“GPI”), and the California Department of Fish and Wildlife (CDFW) regarding Bear Valley’s 2022 Wildfire Mitigation Plan Update (“WMP” or “Plan”). Bear Valley appreciates the time and effort these organizations dedicated to reviewing and commenting on Bear Valley’s WMP and appreciates the opportunity to respond to the comments.

I. Bear Valley Response to Cal Advocates Comments

- 1. Energy Safety should require BVES to improve the quality and fidelity of its risk assessment methods. BVES should report on its progress in its 2023 WMP.***

Bear Valley agrees with Cal Advocates that it should continue to seek to improve the quality and fidelity of its risk assessment methods. BVES will report its progress in this area in its 2023 WMP in accordance with the 2023 WMP Guidelines.

- 2. BVES should work to reconcile the differences between its Fire Safety Circuit Matrix and newer risk assessment methods such as the maps developed with Reax.***

Bear Valley agrees with Cal Advocates’ comment in this area and appreciates the detailed analysis it provided in its comments. Bear Valley is exploring methods to merge the results of the REAX Engineering risk map into the Fire Safety Circuit



Matrix. This effort includes potentially overlaying the REAX Engineering risk heat maps on each circuit to allow for improved risk evaluation.

3. *Energy Safety should require BVES to explain how it uses risk assessments to prioritize its wildfire mitigation work, especially system hardening.*

Bear Valley agrees with Cal Advocates that in its 2023 WMP, it should provide explanations regarding its prioritization of work in the manner that is required by the 2023 WMP Guidelines.

BVES prioritizes and plans work based upon the highest relative risk areas. It should be noted that Bear Valley’s entire 32 square mile service area is “high risk”. The service area is considered “Very Dry” or “Dry” per the National Fire Danger Rating System (NFDRS) over 75 percent of the time. The service area terrain is characterized with a high density of vegetation – trees and shrubs. The CPUC Fire-Threat Map adopted January 19, 2018, designated Bear Valley’s service area as being in the High Fire-Threat District (HFTD) with approximately 90% in Tier 2 (elevated risk) and the remaining 10% in Tier 3 (extreme risk) areas. The Cal Fire California Fire Hazard Severity Zone Map Update Project rates Bear Valley’s service area as “Very High Fire Hazard Severity Zone”. While one can rank the relative risk of BVES’s facilities within the service area, it should be understood that all of BVES’s service area is high risk. In such a small service area, an ignition anywhere can produce embers that the wind can carry and cause a wildfire.

To prioritize work within this small but high-risk area, BVES utilizes its Fire Safety Matrix as a planning tool to prioritize work. Additionally, BVES utilizes the recently produced risk maps that were generated by REAX Engineering. These maps were used to inform BVES’s 2022 WMP.

4. *Energy Safety should require BVES to provide an update that explains in detail how BVES chose where to perform specific projects (including covered conductor installation, detailed asset inspections, and pole loading assessments).*

Bear Valley does not agree with Cal Advocates that additional reporting on how BVES chose to perform specific projects is necessary. Bear Valley provided the



process it uses for selecting project location/type in its WMP. Additionally, BVES scheduled monthly work status meetings with Energy Safety Compliance Division where specific projects and work locations are discussed. BVES periodically provides Energy Safety Compliance Division detailed updates on completed work. Therefore, additional quarterly reporting is unnecessary, duplicative, and increases costs for little or no additional value.

5. *Energy Safety should require BVES to more fully explain its use of a 48-hour fire spread simulation.*

Bear Valley does not agree with Cal Advocates' recommendation. As noted in BVES's WMP, BVES contracted REAX Engineering, an expert consultant in the area of wildfire risk mapping, to develop risk maps for its electrical sub-transmission and distribution system appropriate to the BVES service area. According to REAX Engineering, "Fires are modelled as unsuppressed for a duration of 48-hours because all operational fire models, including ELMFIRE, cannot reliably model fire suppression." This was a limitation of the model utilized at the time of the project. This information is provided in Section 4.5.1 on page 69 of its 2022 WMP. Wildfire risk models based on electric utility assets is a rapidly developing field and BVES agrees improvements are being made and, accordingly, BVES will continue to improve its risk mapping capability. BVES has since engaged another qualified expert contractor, Technosylva, to provide risk maps of its sub-transmission and distribution system.

6. *BVES should provide an analysis of the accuracy of fire simulations at various durations. Based on this analysis, BVES should modify its fire spread duration.*

BVES agrees with Cal Advocates that BVES should continue to improve its wildfire risk mapping. The initial risk mapping provided by REAX Engineering did not include confidence information as noted on page 69 (Section 4.5.1) of BVES's 2022 WMP. Additionally, in BVES's discussion on the application of the results on page 70 of its 2022 WMP, it notes, "In consequence modelling, uncertainty is addressed using large-scale Monte Carlo fire spread modelling to model hundreds of thousands of fires under past and future weather/climate scenarios. Risk is the product of



probability and consequence. Ignition modelling directly quantifies probability. Fire spread modelling quantifies consequence as impacts to structures and acres burned. These are multiplied together to quantify risk. All modelling of this type is inherently uncertain. BVES understands this, but can still determine relative risks from the models, prioritize those risks more likely to occur or cause catastrophic outcomes, and work to reduce and mitigate those risks.”

BVES will continue to improve its risk mapping capability including developing an understanding of accuracies. BVES has since engaged another qualified expert contractor, Technosylva, to provide risk maps of its sub-transmission and distribution system. BVES will provide updates regarding the accuracies of the risk mapping in future WMPs, as required by the applicable WMP Guidelines.

7. *Energy Safety should require BVES to prioritize covered conductor installation in high-risk areas.*

Bear Valley agrees with Cal Advocates in prioritizing covered conductor in high-risk areas. It should be noted that Bear Valley’s entire 32 square mile service area is “high risk”. The service area is considered “Very Dry” or “Dry” per the National Fire Danger Rating System (NFDRS) over 75 percent of the time. The service area terrain is characterized with a high density of vegetation – trees and shrubs. The CPUC Fire-Threat Map, adopted January 19, 2018, designated Bear Valley’s service area as being completely in High Fire-Threat District (HFTD) designated areas with approximately 90% in Tier 2 (elevated risk) and the remaining 10% in Tier 3 (extreme risk) areas. The Cal Fire California Fire Hazard Severity Zone Map Update Project rates Bear Valley’s service area as “Very High Fire Hazard Severity Zone”. While one can rank the relative risk of BVES’s facilities within the service area, it should be understood that all of BVES’s service area is high risk. In such a small service area, an ignition anywhere can produce embers that the wind can carry and cause a wildfire.

8. *Energy Safety should require BVES to explain how it chose the specific locations where it plans to install covered conductor.*



Bear Valley does not oppose Cal Advocates' recommendation.

9. Energy Safety should require BVES to update its covered conductor installation plans for 2023 to target the highest-risk sections of its system.

Bear Valley does not oppose Cal Advocates' recommendation to prioritize covered conductor in high-risk areas and will reassess its covered conductor work plan for its 2023 WMP as it does each year.

10. Energy Safety should require BVES to perform a study on the necessity of installing covered conductor across its entire system.

Bear Valley does not agree with Cal Advocates' recommendation. Such a study would be unnecessary and wasteful use of precious resources.

It should be noted that Bear Valley's entire 32 square mile service area is "high risk". The service area is considered "Very Dry" or "Dry" per the NFDSS over 75 percent of the time. The service area terrain is characterized with a high density of vegetation – trees and brush. The CPUC Fire-Threat Map adopted January 19, 2018, designated Bear Valley's service area as being in the HFTD with approximately 90% in Tier 2 (elevated risk) and the remaining 10% in Tier 3 (extreme risk) areas. The Cal Fire California Fire Hazard Severity Zone Map Update Project rates Bear Valley's service area as "Very High Fire Hazard Severity Zone". While one can rank the relative risk of BVES's facilities within the service area, it should be understood that all of BVES's service area is high risk. In such a small service area, an ignition anywhere can produce embers that the wind can carry and cause a wildfire.

BVES staff is capable of reviewing the risk assessments that are continually improving and prioritizing the higher risk circuits.

11. BVES should divide its system into risk tranches. For each tranche, BVES should evaluate the benefits and costs of covered conductor, as well as the benefits and costs of alternative mitigations.



Bear Valley does not agree with Cal Advocates' recommendation. Such an effort would be duplicative, unnecessary, wasteful, and would divert staff's finite labor hours from supporting the execution of projects in the field that are making an actual difference in mitigating risk to perform an academic exercise with little value added. BVES's system and service area is small and already being managed at the circuit level. Work is prioritized in the high-risk areas. Dividing such a small service area into "tranches" would just add confusion to work plans, would provide little added value, and be duplicative to the current process. Additionally, Cal Advocates states that BVES should consider less expensive alternatives but fails to describe these alternatives, how effective they are, and how they would be ultimately acceptable in the HFTD Tiers 2 and 3. BVES is unsure what these less expensive alternatives are that Cal Advocates seems to support.

12. In relatively low-risk areas, BVES should consider upgrading circuits as existing conductors reach the end of their useful life.

BVES does not agree with Cal Advocates' recommendation. Conductors have a long lifespan, while nominal life is approximately 40-50 years, conductors have been known to last up to 100 years. Due to this, wider variety of lifespan, BVES employs a condition-based replacement strategy that identifies wear or degradation without regard to the age of the equipment, in alignment with industry-best practice. To employ a time-based upgrading and replacement cycle that Cal Advocates suggests would subject Bear Valley's customers, stakeholders, and community to extended risk to public safety for many years while in the same period climate changes continues to increase the risk of wildfire. Such a strategy would be reckless.

It should be noted that Bear Valley's entire 32 square mile service area is "high risk". The service area is considered "Very Dry" or "Dry" per the NFDRS) over 75 percent of the time. The service area terrain is characterized with a high density of vegetation – trees and shrubs. The CPUC Fire-Threat Map, adopted on January 19, 2018, designated Bear Valley's service area as being in the High Fire-Threat District (HFTD) with approximately 90% in Tier 2 (elevated risk) and the remaining 10% in Tier 3 (extreme risk) areas. The Cal Fire California Fire Hazard Severity Zone Map



Update Project rates Bear Valley's service area as "Very High Fire Hazard Severity Zone". While one can rank the relative risk of BVES's facilities within the service area, it should be understood that all of BVES's service area is high risk. In such a small service area, an ignition anywhere can produce embers that the wind can carry and cause a wildfire.

While BVES agrees with Cal Advocates that within the BVES service area some areas are a lower relative risk, the entire area is elevated or extreme risk and BVES's facilities must be hardened to mitigate the risk of wildfire.

13. Energy Safety should require BVES to submit a risk-to-benefit analysis of its proposed solar plus storage project. BVES should submit a full analysis in its WMP prior to filing an application for approval at the CPUC.

BVES does not agree with Cal Advocates in setting up a process where generation projects are tied to WMPs. The Public Utilities Code provides the process for the Commission to review and approve generation projects. This process should not be circumvented by adding a requirement not legislatively supported. Generation projects have many benefit streams that go well beyond wildfire and public safety power shut-off (PSPS) mitigation. BVES will commit to discussing such projects in future WMPs when they are mature enough in the project development process and provide benefit to wildfire and PSPS mitigation.

14. Energy Safety should require BVES to work with the US Forest Service to ensure the Radford Covered Conductor Project is completed by 2023.

Bear Valley agrees with the intent of Cal Advocates' recommendation. BVES is engaging with the U.S. Forest Service (USFS) and has been doing so since 2020 to perform this project. Moreover, BVES is committed to developing the Radford Covered Conductor Project but must adhere to the USFS permitting process and ensure that the environmental impact concerns of the USFS are properly satisfied. That said, BVES does not control the USFS's permitting timelines and workload. BVES, in accordance with USFS requirements, is following the USFS's permitting



process, but delays have persisted. BVES is but one of many entities that the USFS must dedicate its limited resources to permitting activities and BVES is rightly not able to set the priorities within the USFS. BVES currently holds weekly calls with the USFS and is making its best effort to advance the permit.

15. Energy Safety should require BVES to report on the status of the Radford line project in its WMP quarterly data reports, beginning with the third quarter in 2022.

Bear Valley does not oppose Cal Advocates' recommendation. However, BVES notes that these updates will have no bearing on how quickly the USFS will approve BVES's permit request.

16. BVES should describe how it is exercising oversight of its contractors for the Radford line project.

Bear Valley does not agree with Cal Advocates' recommendation. BVES performs regular oversight of contractor work products and provisions a schedule of work to be performed on all of its contracted projects including the Radford Line Project. Cal Advocates has provided no evidence that BVES is not exercising proper oversight of its contractors or that there is something to be gained by this extra reporting.

17. Energy Safety should not approve BVES's 2023 WMP unless BVES has completed all permitting steps for the Radford line project.

BVES does not agree with Cal Advocates' recommendation. While the Radford Covered Conductor Project is a very high priority project and Bear Valley is fully committed to accomplishing it as soon as feasible, Bear Valley has put in place mitigations to limit risk stemming from Radford Line operations, including de-energizing the line during fire season without impact to customers, while the delays encountered in the permitting process persist. Unfortunately, the permitting process is out of BVES's control. It would not be beneficial to Bear Valley's customers, stakeholders, and the community to hold up BVES's entire WMP with over eighty-six



WMP initiatives for the sake of one project's permit for which BVES does not control the timeline in its permitting process.

18. Energy Safety should require BVES to begin performing field QC inspections in 2022.

Bear Valley agrees with Cal Advocates' recommendation.

19. Energy Safety should require BVES to provide quarterly reporting on the implementation of its asset inspection QA/QC program.

Bear Valley agrees with Cal Advocates' recommendation.

20. BVES should report on asset inspection field QC in its 2023 WMP.

Bear Valley agrees with Cal Advocates' recommendation.

21. Energy Safety should require BVES to justify the decelerated pace of its pole loading assessment program.

Bear Valley does not agree with Cal Advocates' recommendation. The new pace is due to merging of the covered conductor project with pole loading and replacement projects. There are limitations on available contractors to conduct the pole loading and replacement project and covered conductor project. In performing the covered conductor work, each pole must be assessed for loading strength and any pole that fails an assessment is remediated or replaced. The Radford line traverses steep forested mountain slopes, and the replacement of poles also requires the contracted services of specialized helicopter pilots. As a result, replacing bare conductors with covered conductors involves significantly more work than simply replacing poles. Given the risk benefit gained by installing covered wire versus the risk benefit of simply replacing weakened poles, BVES believes it is more effective to prioritize its



limited contracted resources to the covered conductor project, which also addresses the goals of the pole loading and assessment program.

22. In its 2023 WMP, BVES should detail the number and types of failures found in its recent pole loading assessments, and the number of poles in high-risk locations that have not recently been subjected to a pole loading assessment.

Bear Valley does not agree with Cal Advocates' recommendation. WMPs are forward looking plans. Retrospective reporting is not appropriate and would simply increase the size of the WMP, potentially obscuring essential WMP information, and provide no value added. BVES does track this data and uses it to inform its project priority and scheduling.

23. Energy Safety should direct BVES to file a revised PSPS plan that includes the Commission's Phase 3 PSPS Guidelines.

Bear Valley does not agree with Cal Advocates' recommendation. BVES has implemented Phase 3 guidelines and is in the process of updating the language in its internal PSPS Plan document. BVES staff are familiar with phase 3 guidelines and have demonstrated their knowledge and ability to execute a PSPS in accordance with phase 3 guidelines during a tabletop drill and a functional tabletop drill this year, which were monitored by many outside entities including the Commission's Wildfire Safety and Enforcement Branch (WSEB) in the Safety and Enforcement Division (SED).

24. Energy Safety should require BVES to identify persons reliant on electricity to maintain necessary life functions.

Bear Valley is unclear on the specificity that Cal Advocates recommend in identifying persons reliant on electricity to maintain necessary life functions. In the past 12 months, BVES has doubled the number of persons identified as reliant on electricity to maintain necessary life functions. Recently, BVES issued another letter to its



customers using the best practices of the other utilities to further enhance this effort. BVES is unable to post the specific customer data in public documents such as WMPs. BVES does not oppose including number of customers who are listed as AFN but will not include lists of customer names due to privacy concerns.

II. **Bear Valley Response to GPI Comments**

1. *Equivocating language is a persistent issue in the SMJU WMPs.*

GPI makes this generalized comment for the SMJUs without providing specifics in BVES's WMP. BVES agrees that equivocating language which indicate future possibilities but lack certainty is not optimal, but it should be noted that the wildfire risk assessment process as well as experience in wildfire mitigation measures are rapidly evolving. Therefore, in some instances it is not appropriate for SMJUs, which have small customer bases, to commit to new but yet unproven technologies in their wildfire mitigation efforts. It is however appropriate to note that the utility is considering certain new technologies and will take action when and if appropriate.

2. *Liberty and BVES spending stabilized along with program targets.*

Bear Valley notes GPI's comment.

3. *SMJU's WMP-associated electric bill increases are much higher than IOU WMP customer increases.*

Bear Valley notes GPI's comment. The entire 32 square mile (approximately 26 square miles if one subtracts out the lakes) of BVES's service area is within the HFTD and approximately 90 percent of which is Tier 2 (elevated risk) and approximately 10 percent is Tier 3 (extreme risk). Therefore, BVES must address wildfire mitigation measures across its entire service area with a small customer base (24,600 customers) to spread the costs across. The larger IOUs also perform wildfire



mitigation in their HFTD areas, which are nowhere near 100% of their service areas, but they are able to spread the cost across their entire customer base, which naturally include those customers not in the HFTDs. Therefore, it is understandable that the difference in impact on a per customer basis that GPI points out exists.

4. *BVES does not distinguish between top-risk circuits and percent of work completed therein in their Program Targets tables.*

BVES does not agree with GPI's comment.

It should be noted that Bear Valley's entire 32 square mile service area is "high risk". The service area is considered "Very Dry" or "Dry" per NFDRS over 75 percent of the time. The service area terrain is characterized with a high density of vegetation – trees and shrubs. The CPUC Fire-Threat Map, adopted on January 19, 2018, designated Bear Valley's service area as being in the High Fire-Threat District (HFTD) with approximately 90% in Tier 2 (elevated risk) and the remaining 10% in Tier 3 (extreme risk) areas. The Cal Fire California Fire Hazard Severity Zone Map Update Project rates Bear Valley's service area as "Very High Fire Hazard Severity Zone". While one can rank the relative risk of BVES's facilities within the service area, it should be understood that all of BVES's service area is high risk. In such a small service area, an ignition anywhere can produce embers that the wind can carry and cause a wildfire.

GPI suggests that adjustments to the HFTD may be warranted but offers no evidence that this is the case in BVES's service area. While BVES agrees that relative risk within the service area can be established (and it has been), it should not lead one to believe that any part of the BVES service area is "low risk."

5. *SMJU lessons learned assessments are a plan weakness that suggests high-level directional planning for the WMP is somewhat uncertain.*

GPI makes this generalized comment for the SMJUs without providing specifics in BVES's WMP. BVES agrees that lessons learned are a key component in plan development.



6. *SMJUs should clearly describe how they are working with other utilities to leverage existing data and ongoing studies relevant to their WMP research efforts.*

BVES notes GPI's comment. BVES participates in all of the joint IOU workshops and has developed working relationships with its counterparts in other utilities. These interactions are an invaluable source of information in developing BVES's wildfire mitigation initiatives. Additionally, BVES reviews other IOU WMPs as well as public utility WMPs to gain a better understanding of programs that are effective in wildfire mitigation. Also, Bear Valley periodically sends staff to conferences that include electric utility wildfire mitigation topics.

7. *The SMJUs are relying heavily on the HFTD maps to guide risk mitigation planning efforts. They are also failing to analyse more granular risk and/or to use more granular risk findings to inform updates to the HFTD.*

Bear Valley does not agree with GPI's comment.

It should be noted that Bear Valley's entire 32 square mile service area is "high risk". The service area is considered "Very Dry" or "Dry" per the NFDRS over 75 percent of the time. The service area terrain is characterized with a high density of vegetation – trees and shrubs. The CPUC Fire-Threat Map, adopted on January 19, 2018 designated Bear Valley's service area as being in the High Fire-Threat District (HFTD) with approximately 90% in Tier 2 (elevated risk) and the remaining 10% in Tier 3 (extreme risk) areas. The Cal Fire California Fire Hazard Severity Zone Map Update Project rates Bear Valley's service area as "Very High Fire Hazard Severity Zone". While one can rank the relative risk of BVES's facilities within the service area, it should be understood that all of BVES's service area is high risk. In such a small service area, an ignition anywhere can produce embers that the wind can carry and cause a wildfire.

GPI provides no evidence that there are areas in BVES's service area that should be excluded from the HFTD. BVES has developed risk maps along its circuits, and it is prioritizing the relatively higher risk portions of its circuit.



8. *SMJUs may be oversimplifying their assessment of climate change effects on granular wildfire risk.*

GPI makes this generalized comment for the SMJUs without providing specifics in BVES's WMP. BVES agrees the effects of climate change are an integral part of WMPs. In 2022, BVES developed risk maps along its circuits looking at 2050 projected climate conditions.

9. *SMJUs fail to include tree species data in their risk modelling or vegetation management considerations.*

GPI makes this generalized comment for the SMJUs without providing specifics in BVES's WMP. BVES already collects tree species data in its vegetation management program and considers species in developing revisit periods. Additionally, BVES has engaged Technosylva to provide risk maps of its sub-transmission and distribution system and will work with them to account for vegetation species.

10. *SMJUs have not yet developed comprehensive or transparent quantification methods for wildfire consequence and should be required to do so in the next 3-year WMP cycle.*

BVES agrees with GPI in its assessment of what the Commission has required the SMJUs to implement in the area of risk modelling. BVES notes that it, like other utilities, has made substantial improvements in this area and is committed to continuing to do so. BVES has engaged Technosylva to provide risk maps of its sub-transmission and distribution system and help quantify consequence.

11. *Comments on BVES's wildfire risk modelling.*

BVES notes and appreciates GPI's detailed commentary on its wildfire risk modelling as described in its WMP. BVES agrees with incorporating the REAX Engineering modelling into its risk modelling and risk ranking.



12. Risk modelling and assessments do not include tree species.

BVES notes GPI's comment. BVES has engaged Technosylva to provide risk maps of its sub-transmission and distribution system and will work with them to account for vegetation species.

13. A standard fire spread model duration should be set for wildfire consequence modelling and quantification. GPI supports a 24 h duration to encompass a full diurnal cycle.

BVES notes GPI's comment on establishing a standard fire spread model duration but does not agree with mandating a standard fire spread model. BVES cautions that service areas have different characteristics (topography, vegetation, weather, etc.) and ultimately it is the utility that is responsible for public safety and the safe operation of its equipment. Therefore, the utility must select the risk modelling that it deems appropriate for understanding the risk.

BVES suggests that the focus should be on the sharing of best practices in risk modelling such that the SMJUs are able to make better informed decisions in their risk modelling choices. If a standardized model were to be implemented across utilities, BVES acknowledges that it would be useful in comparison of risk across utilities, but it should be the utility's decision upon which risk model(s) to base its safety related decisions.

14. BVES should explore opportunities to contract with SCE for wildfire planning and/or mitigation services.

BVES notes GPI's comment and will see where that may be feasible.

15. All SMJUs should have a specific CC maintenance program that takes into consideration CC specific failure modes.



BVES does not agree with GPI's recommendation. BVES follows, at a minimum, the manufacturers installation, maintenance, and inspection instructions as well as any applicable requirements in GO-95 and GO-165. BVES does this for all equipment it installs and operates in its system. GPI has offered no evidence that the SMJUs are not meeting standards in this area with respect to covered conductors. While this information is available, including it in WMPs unnecessary and would make the document cumbersome.

16. SMJUs should explain how they schedule and perform additional inspections and vegetation management in wildfire impacted areas.

BVES notes GPI's comment. BVES does not have any burn areas in its service area; therefore, it has, fortunately, not had to inspect areas around its facilities that were wildfire impacted. Bear Valley will reach out to other utilities with experience in this area.

III. Bear Valley Response to CDFW Comments

- 1. CDFW makes the following recommendation: "Early consultation with CDFW by BVES's environmental staff and early completion of all documentation necessary for CDFW's discretionary review of activities covered under the Plan."***

Bear Valley agrees with CDFW's recommendation.

Sincerely,

/s/ Paul Marconi

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Cc: Carolyn Chen, Public Advocates Office.



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