



July 22, 2022

Paul Marconi  
President, Treasurer & Secretary  
Bear Valley Electric Service Inc.  
42020 Garstin Dr., Big Bear Lake, CA 92315

**Subject: Office of Energy Infrastructure Safety Issuance of Revision Notice for Bear Valley Electric Service, Inc.’s 2022 Wildfire Mitigation Plan Update and Notice of Extension of Office of Energy Infrastructure Safety’s Determination Per Public Utilities Code 8389.3(a)**

Mr. Marconi:

Pursuant to Public Utilities Code section 8386.3(a), before approval of an electrical corporation’s (hereafter “utility”) Wildfire Mitigation Plan (WMP), the Office of Energy Infrastructure Safety (Energy Safety) may require modification of the WMP. Energy Safety effectuates this by issuing a Revision Notice.

Enclosed is a Revision Notice Energy Safety is issuing in conjunction with its review of Bear Valley Electric Company, Inc.’s (BVES) 2022 WMP Update (2022 Update). This Revision Notice confirms that Energy Safety has identified critical issues within BVES’s 2022 Update. Critical issues are defined as areas of significant concern that may lead to denial of a WMP if associated remedies are not satisfactorily addressed by the utility. For each identified critical issue, Energy Safety sets forth remedies that BVES must address.

Within 30 days after issuance of this Revision Notice, on or before August 22, 2022, BVES must provide:

- A response to all critical issues using naming convention “YYYY-MM-DD\_BVES\_22\_RNR\_R0”<sup>1</sup>; and
- A revised version of its 2022 Update that includes any changes to the 2022 Update resulting from responding to the Revision Notice, in both a clean and redlined version

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<sup>1</sup> 2022 WMP Guidelines, Attachment 2, p. 7.

of the document. Use the naming convention “YYYY-MM-DD\_BVES\_22\_WMP-Update\_R1”<sup>2</sup> and “YYYY-MM-DD\_BVES\_22\_WMP-Update\_R1-redline” respectively.

BVES should not be duplicative in its Revision Notice Response and revised 2022 Update. As appropriate, BVES should use the Revision Notice Response to cross-reference the exact section(s) where it has remedied critical issues in its revised 2022 Update.

BVES must submit its Revision Notice Response and revised 2022 Update via email to the Energy Safety Deputy Director. In addition, BVES’s Revision Notice Response and revised 2022 Update must be submitted to the 2022 Wildfire Mitigation Plan Updates docket (#2022-WMPs).<sup>3</sup> BVES must concurrently serve its Revision Notice Response on the California Department of Forestry and Fire Protection (CAL FIRE) at [CALFIREUtilityFireMitigationUnit@fire.ca.gov](mailto:CALFIREUtilityFireMitigationUnit@fire.ca.gov).

### **Public comments**

Stakeholders may submit one set of comments on BVES’s Revision Notice Responses within 20 calendar days after BVES’s Revision Notice Response submittal. Reply comments are due 10 calendar days thereafter and shall be limited to issues raised and representations made in opening comments of other stakeholders. As such, opening comments must be submitted no later than September 12, 2022. Reply comments must be submitted no later than September 22, 2022.<sup>4</sup>

Public comments must be submitted to Energy Safety’s e-filing system in the 2022 Wildfire Mitigation Plans docket (#2022-WMPs).<sup>5</sup> Submission files must use the naming conventions “YYYY-MM-DD\_Stakeholder Name\_Comments\_BVES\_2022\_RNR.”

### **Extension of statutory deadline**

Pursuant to Public Utilities Code section 8386.3(a), Energy Safety must issue a written determination on a utility’s WMP or WMP Update within three months of submission, unless Energy Safety makes a written determination, including reasons supporting the determination, that the three-month deadline cannot be met. This Revision Notice serves as

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<sup>2</sup> 2022 WMP Guidelines, Attachment 2, p. 7.

<sup>3</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs>

<sup>4</sup> Dates falling on a Saturday or holiday as defined in Government Code Section 6700 have been adjusted to the next business day in accordance with Government Code Section 6707.

<sup>5</sup> Submit comments to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs>

Energy Safety's notice of an extension of the three-month deadline to issue its determination on BVES's 2022 Update.

Energy Safety finds the critical issues to be of enough importance that an extension of the three-month statutory deadline is necessary for Energy Safety to adequately determine that BVES's 2022 Update satisfies the information requirements as set out in Energy Safety's Final 2022 WMP Update Guidelines<sup>6</sup> and, when implemented, will sufficiently reduce wildfire risk and impacts to public safety.

Energy Safety will issue its Draft Decision on BVES's 2022 Update by October 17, 2022.

Sincerely,

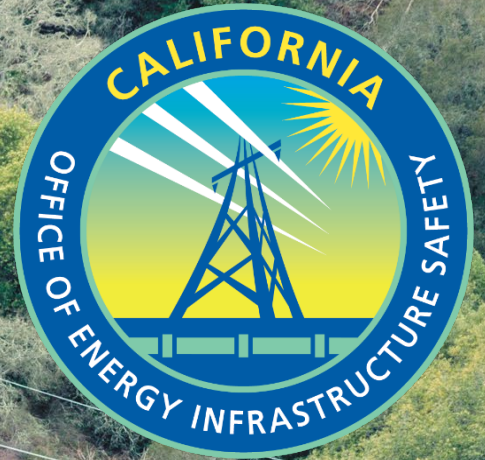
A handwritten signature in black ink, appearing to read "Melissa Semcer". The signature is fluid and cursive, with the first name "Melissa" and last name "Semcer" clearly distinguishable.

Melissa Semcer  
Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

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<sup>6</sup>Final 2022 Wildfire Mitigation Plan Update Guidelines (accessed January 26, 2022):  
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>





**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**  
**REVISION NOTICE FOR**  
**BEAR VALLEY ELECTRIC SERVICE, INC.'S**  
**2022 WILDFIRE MITIGATION PLAN UPDATE**

July 22, 2022



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# 1. Introduction

Pursuant to Public Utilities Code section 8386.3(a), before approval of an electrical corporation's (hereafter "utility") Wildfire Mitigation Plan (WMP), the Office of Energy Infrastructure Safety (Energy Safety) may require modification of the WMP. Energy Safety effectuates this by issuing a Revision Notice.

This Revision Notice confirms that Energy Safety has identified critical issues within Bear Valley Electric Service, Inc.'s (BVES's) 2022 Update to its WMP (2022 Update). Critical issues are defined as areas of significant concern that may lead to denial of a WMP if associated remedies are not satisfactorily addressed by the utility. BVES must address the critical issues set forth in this Revision Notice according to the parameters set forth herein. Section 5 provides submission instructions and deadlines.

# 2. Extension of Statutory Deadline

Pursuant to Public Utilities Code section 8386.3(a), Energy Safety must issue a written determination on a utility's WMP or WMP Update within three months of submission, unless Energy Safety makes a written determination, including reasons supporting the determination, that the three-month deadline cannot be met. This Revision Notice serves as Energy Safety's notice of an extension of the three-month deadline to issue its determination on BVES's 2022 Update.

Energy Safety finds the critical issues to be of enough importance that an extension of the three-month statutory deadline is necessary for Energy Safety to adequately determine that BVES's 2022 Update satisfies the information requirements as set out in Energy Safety's Final 2022 WMP Update Guidelines<sup>7</sup> and, when implemented, will sufficiently reduce wildfire risk and impacts to public safety. Energy Safety will issue its Draft Decision on BVES's 2022 Update by October 17, 2022.

# 3. Summary of Critical Issues

Where a utility fails to sufficiently address a required element of the WMP as prescribed by Public Utilities Code section 8386, a requirement detailed in the 2022 Wildfire Mitigation Plan Update Guidelines, or a specific area for continued improvement outlined in a previous plan approval, it can constitute a critical issue. This section outlines the ten critical issues

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<sup>7</sup> Final 2022 Wildfire Mitigation Plan Update Guidelines (accessed January 26, 2022): <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>.

associated with BVES's 2022 Update. The issues are categorized below by the relevant 2022 WMP Guideline mitigation initiative section.

Section 4 provides a more detailed explanation of each critical issue and sets out specific remedies. BVES must demonstrate in its Revision Notice Response that it has fully addressed and responded to each remedy. Failure to respond and fully address Revision Notice remedies may result in denial of BVES's 2022 Update.

For purposes of BVES's responses and Energy Safety's continued evaluation, the issues are assigned tracking codes.

### **General Critical Issues**

- **RN-BVES-22-01: BVES has not responded to "Additional Issues"**
- **RN-BVES-22-02: BVES has not provided adequate detail on mitigation initiative progress**

### **Grid Design and System Hardening**

- **RN-BVES-22-03: BVES has not sufficiently connected its risk assessment with its mitigation initiative prioritization**

### **Asset Management and Inspections**

- **RN-BVES-22-04: BVES has not provided sufficient information on quality assurance & quality control (QA/QC)**

### **Vegetation Management and Inspections**

- **RN-BVES-22-05: BVES claims aspects of its vegetation management program are "enhanced" despite meeting only minimum regulatory requirements**

### **Data Governance**

- **RN-BVES-22-06: BVES has misinterpreted data management initiatives**

### **Resource Allocation Methodology**

- **RN-BVES-22-07: BVES does not describe how quantifiable risk reductions and RSE estimates inform initiative selection**

### **Emergency Planning and Preparedness**

- **RN-BVES-22-08: BVES uses vague language to describe its service restoration workforce**

### **Stakeholder Cooperation and Community Engagement**

- **RN-BVES-22-09: BVES uses vague language to describe United States Forest Service and fuel reduction cooperation activities**

#### **Public Safety Power Shutoff (PSPS)**

- **RN-BVES-22-10: BVES does not describe how its PSPS planning has evolved**

## **4. Critical Issues and Required Remedies**

### **4.1 General Critical Issues**

#### **4.1.1 RN-BVES-22-01: BVES has not responded to “Additional Issues”**

As stated in the Final Action Statement on BVES's 2021 WMP Update, “Energy Safety lists additional issues for continued improvement to increase the maturity of BVES's wildfire mitigation capabilities in the evaluation sections below. These additional issues are denoted by bullet points. Energy Safety expects BVES to take action to address these issues and report on progress made over the year in its 2022 WMP Update.”<sup>8</sup> BVES has not addressed the additional issues in its 2022 WMP Update.

#### **Required Remedies**

BVES must respond to each “additional issue” identified in Energy Safety's 2021 Final Action Statement by detailing actions BVES has or will take to address these issues, and BVES must report on progress made since the publication of the Final Action Statement on BVES's 2021 WMP Update. If BVES did address certain additional issues in its initial 2022 WMP filing, BVES must direct Energy Safety to the location of the information. If BVES has not or is not intending on taking action(s) to make progress on certain additional issues, BVES must explain why for each applicable issue. Energy Safety has provided a list of the “additional issues” and associated remedies BVES must respond to in Appendix A of this Revision Notice; each issue has a tracking code.

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<sup>8</sup> Final Action Statement on 2021 Wildfire Mitigation Plan Update – Bear Valley Electric Service, Inc., p. 17.



### 4.1.2 RN-BVES-22-02: BVES has not provided adequate detail on mitigation initiative progress

BVES does not adequately “[r]eport detailed information for each initiative.”<sup>9</sup> Of particular concern, BVES does not adequately report “[p]rogress on initiative since the last WMP submission and plans, targets, and/or goals for the current year.”<sup>10</sup> Instead, in most initiative sections where BVES should provide detailed information and progress since last year, BVES lists expenditures, risk-spend-efficiency (RSE), and a vague commitment to continue existing programs.

BVES must provide enough information for Energy Safety to understand how BVES's operations mitigate wildfire risk and what progress BVES has made and plans to make towards mitigating its risk. While not all initiatives in the Section 7.3 lack the detail Energy Safety requires, the issue is widespread enough that BVES must reevaluate its response to each of the 88 mitigation initiatives.

Failure to provide requisite detail is a failure to satisfy statutory requirements of a WMP pursuant to Public Utilities Code section 8386(c)(3) and (14), which read:

The wildfire mitigation plan shall include all of the following: ...

(3) A description of the preventive strategies and programs to be adopted by the electrical corporation to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks...

(14) A description of the actions the electrical corporation will take to ensure its system will achieve the highest level of safety, reliability, and resiliency, and to ensure that its system is prepared for a major event, including hardening and modernizing its infrastructure with improved engineering, system design, standards, equipment, and facilities, such as undergrounding, insulating of distribution wires, and replacing poles.

Additionally, BVES has failed to meet the requirements of Deficiency Guidance-8, Class C, “Prevalence of equivocating language – failure of commitment,” which requires BVES (and all electrical corporations) to “[d]ispense with empty rhetoric and not use terms that are ambiguous, misleading, or otherwise have the result of diluting commitments.”<sup>11</sup>

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<sup>9</sup> 2022 WMP Guidelines, Attachment 2, p. 74.

<sup>10</sup> 2022 WMP Guidelines, Attachment 2, p. 74.

<sup>11</sup> Resolution WSD-002, p. 26. This document can be found at: <https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2020/docs/340859823.pdf>.

## Required Remedies

In its revised 2022 Update, BVES must clearly and fully detail its wildfire mitigation initiatives in accordance with the requirements set forth in the 2022 WMP Guidelines<sup>12</sup> throughout Section 7.3 of its WMP so that Energy Safety can evaluate BVES' operations and progress towards reducing wildfire risk in service territory.

Energy Safety suggests that BVES use its responses to other RN issues, 2021 Key Areas for Improvement, 2021 Additional Issues, and its WMP appendices to inform the revision of Section 7.3.

## 4.2 Grid Hardening and System Design

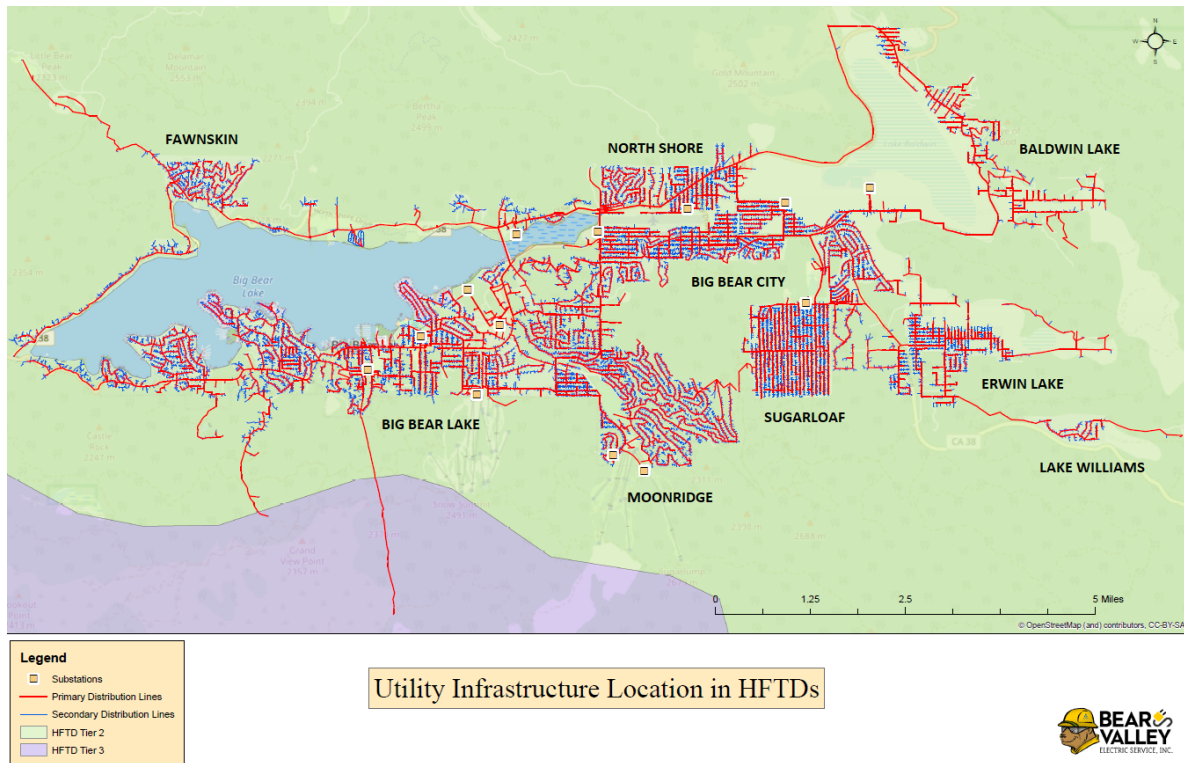
### 4.2.1 RN-BVES-22-03: BVES has not sufficiently connected its risk assessment with its mitigation initiative prioritization

In the Final Action Statement on BVES's 2021 WMP Update, Energy Safety identified a key area of improvement (BVES-21-07) that requires BVES to provide more detail on how it uses risk assessment(s) to inform prioritization of initiatives, particularly for grid hardening efforts. BVES completes risk assessments to determine the highest risk circuits along its system, including its Fire Safety Circuit Matrix and Reax wildfire risk maps, yet its discussion of how it uses the risk assessment outcomes to prioritize and determine locations for initiatives is inadequate. This risk informed discussion for each initiative should be under subsection "Region Prioritization;"<sup>13</sup> however, BVES's discussions in "Region Prioritization" either lacks details or defaults prioritization to HTFD Tier 2 and Tier 3 designations (in which BVES's entire service territory resides, see Figure 1), instead of being directly informed by BVES's completed risk assessments.

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<sup>12</sup> 2022 WMP Guidelines, Attachment 2, p. 74.

<sup>13</sup> "Region prioritization ('where' to engage initiative) – include reference to a risk informed analysis in allocation of initiative (e.g., veg clearance is done for trees tagged as "high-risk") and demonstrate that high-risk areas are being prioritized" – 2022 WMP Guidelines, Attachment 2, p. 74.

Figure 1: HFTD Overlay in BVES's Service Territory<sup>14</sup>

For example, when discussing the prioritization of its covered conductor program, BVES states the following:

Several factors are considered when determining which specific miles of 4kV distribution wire is replaced. Some of these factors include risk of the circuit, benefit to the overall system design, ignition and consequence modeling, and current condition of the circuit.<sup>15</sup>

While BVES provides maps illustrating its plans to install covered conductor in 2022 and 2023,<sup>16</sup> the selected circuits do not seem to align with the highest-risk circuits as determined by BVES's risk assessments.<sup>17</sup>

<sup>14</sup> BVES's 2022 WMP Update, Figure 4.2-4, p. 35.

<sup>15</sup> CalAdvocates-BVES-2022WMP-07, Question 5.

<sup>16</sup> BVES's 2022 WMP Update, Figures 7.3-4 and 7.3-5, p. 153-154.

<sup>17</sup> BVES's 2022 WMP Update, p. 70-72.

## Required Remedies

In the relevant WMP section(s) of its revised 2022 Update, BVES must:

- a) Integrate its response to BVES-21-07, found in Appendix A, into WMP Section 7.3.3 “Grid Design and System Hardening.”
- b) Demonstrate that its risk assessments directly inform the prioritization of initiatives, instead of broadly stating that risk is a consideration or defaulting prioritization to only HTFD Tier 2 and Tier 3 designations.
- c) Demonstrate that its future planned grid hardening mitigation initiatives, particularly covered conductor, will address the highest risk circuits as self-assessed and identified by BVES and its relevant contractor(s).
- d) Describe how it selected the location of its covered conductor pilot program.

## 4.3 Asset Management and Inspections

### 4.3.1 RN-BVES-22-04: BVES has not provided sufficient information on quality assurance & quality control (QA/QC)

In its Final Action Statement on BVES's 2021 WMP Update, Energy Safety identified a key area of improvement (BVES-21-09) that required BVES to develop and provide updates on its adoption of a formal QA/QC process for asset inspections. However, in its 2022 Update, BVES provides little detail on the progress it has made in developing its formal QA/QC program and little to no details on any pre-existing or interim QA/QC processes. Instead, BVES only states that it will adopt a formal asset inspection program in late 2022. Notably, BVES did not complete any QA/QC checks or audits of asset inspections in 2021.<sup>18</sup> Under Public Utilities Code section 8386(c)(19)(C), BVES must do the following:

Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, carried out under the plan and other applicable statutes and commission rules.

BVES has not demonstrated that it is auditing and checking its existing asset management inspection practices.

## Required Remedies

In the relevant WMP section(s) of its revised 2022 Update, BVES must:

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<sup>18</sup> CalAdvocates-BVES-2022WMP-08, questions 9, 10, and 12.



- a) Provide details on progress made developing and implementing its formal QA/QC process, including implementation timing.
- b) Provide results of the “interim” QA/QC processes BVES has used for assets, including details on what type of QA/QC was performed, the percentage of asset inspections on which BVES completed QA/QC, and the results of the QA/QC performed since the 2021 WMP Update.

As part of these required remedies, BVES must also remedy RN-BVES-22-02.

## 4.4 Vegetation Management and Inspections

### 4.4.1 RN-BVES-22-05: BVES claims aspects of its vegetation management program are “enhanced” despite meeting only minimum regulatory requirements

BVES describes many mitigation initiatives in its vegetation management program as “enhanced;” however, some of these “enhanced” initiatives only meet minimum regulatory requirements, as identified in Table 1. While these initiatives may have “enhanced” aspects, BVES does not explain what aspects of these initiatives exceed GOs and other regulatory minimums.

In its Final Action Statement on BVES's 2021 WMP Update, Energy Safety identified an additional issue related to BVES's use of the term “Enhanced Vegetation Management” (EVM) to describe numerous aspects of its vegetation management (VM) program. In 2021, BVES used “EVM” to describe fuel reduction,<sup>19</sup> “collaborative measures with the USFS,”<sup>20</sup> “off-schedule” risk-based inspections and VM activities,<sup>21</sup> the contracting of a full-time utility forester,<sup>22</sup> at-risk species remediation,<sup>23</sup> strike potential tree removal,<sup>24</sup> its vegetation inventory system,<sup>25</sup> and equipment clearances.<sup>26</sup> Energy Safety directed BVES to use the term

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<sup>19</sup> BVES 2021 WMP Update Revision – Clean, p. 46 and p. 158.

<sup>20</sup> BVES 2021 WMP Update Revision – Clean, p. 88.

<sup>21</sup> BVES 2021 WMP Update Revision – Clean, p. 156.

<sup>22</sup> BVES 2021 WMP Update Revision – Clean, p. 159.

<sup>23</sup> BVES 2021 WMP Update Revision – Clean, p. 160.

<sup>24</sup> BVES 2021 WMP Update Revision – Clean, p. 161.

<sup>25</sup> BVES 2021 WMP Update Revision – Clean, p. 163.

<sup>26</sup> BVES 2021 WMP Update Revision – Clean, p. 164.

“EVM” more deliberately and align its definition of EVM with its peer utilities in its 2022 WMP Update.<sup>27</sup>

In its 2022 Update, BVES continues to use “EVM” to describe most of its VM program: detailed inspections,<sup>28</sup> fuels reduction,<sup>29</sup> LiDAR inspections,<sup>30</sup> patrol inspections,<sup>31</sup> identification and mitigation of “at-risk” species,<sup>32</sup> hazardous tree removal,<sup>33</sup> its vegetation inventory system,<sup>34</sup> and clearances.<sup>35</sup>

However, when describing “enhanced inspections” and mitigation practices, BVES repeatedly refers to meeting minimum regulatory requirements. In some of these instances, BVES references “exceeding” requirements, yet does not describe how it is exceeding requirements; see Table 1 below. Energy Safety defines “enhanced” as an inspection or activity whose frequency, thoroughness, and/or process exceeds regulatory and/or statutory requirements.<sup>36</sup>

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<sup>27</sup> Final Action Statement on 2021 Wildfire Mitigation Plan Update – Bear Valley Electric Service, Inc., p. 51.

<sup>28</sup> BVES 2022 WMP Update, p. 191.

<sup>29</sup> BVES 2022 WMP Update, p. 194.

<sup>30</sup> BVES 2022 WMP Update, p. 196.

<sup>31</sup> BVES 2022 WMP Update, p. 199.

<sup>32</sup> BVES 2022 WMP Update, p. 202.

<sup>33</sup> BVES 2022 WMP Update, p. 203.

<sup>34</sup> BVES 2022 WMP Update, p. 205.

<sup>35</sup> BVES 2022 WMP Update, p. 206.

<sup>36</sup> The 2022 WMP Guidelines, Attachment 2, (p. 14) defines “Enhanced Inspection” as “Inspection whose frequency and thoroughness exceeds the requirements of the detailed inspection, particularly if driven by risk calculations.”

*Table 1: Instances in which BVES Cites Minimum Regulatory Requirements for its Enhanced Vegetation Management Program*

<b>WMP Initiative #</b>	<b>“Enhanced” Mitigation Initiative</b>	<b>Quotes from BVES Citing Minimum Regulatory Requirements</b>	<b>WMP Page #</b>
<b>7.3.5.2</b>	Detailed Inspections	<p>“BVES conducts [detailed] inspections at least once every five years in compliance with GO 165 and GO 95 (Rule 18).”</p> <p>NOTE: The cited GOs do not dictate vegetation inspection scope or frequency.</p>	192
<b>7.3.5.5</b>	Fuels Mitigation	<p>“BVES is required to perform many of these activities by GOs and applicable standards but BVES recognizes the community imperative to carry out these activities in a manner that meets or exceeds the requirements, especially in higher risk areas.”</p> <p>NOTE: Various regulations require cleanup/mitigation of “slash,” including the Forest Practice Rules which apply to timberlands.<sup>37</sup></p>	194
<b>7.3.5.11</b>	Patrol Inspections	<p>“In compliance with GO 95 and 165, BVES’s Inspection Program requires overhead facilities to receive an on-ground patrol inspection each year.”</p> <p>NOTE: The cited GOs do not dictate vegetation inspection scope or frequency.</p>	199
<b>7.3.5.16</b>	Hazardous Tree Removal	<p>“BVES is required to perform many of these activities by GOs and applicable standards, but BVES recognizes the community</p>	203

<sup>37</sup>Public Resources Code section 4526: “Timberland” means “land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.”

WMP Initiative #	“Enhanced” Mitigation Initiative	Quotes from BVES Citing Minimum Regulatory Requirements	WMP Page #
		<p>imperative to carry out these activities in a manner that meets or exceeds the requirements, especially in higher risk areas.”</p> <p>NOTE: The removal of “dead, rotten or diseased trees” is required by GO 95, Rule 35.</p>	

## Required Remedies

In the relevant WMP sections of its revised 2022 Update, BVES must:

- a) Clearly and fully articulate its detailed inspections, fuels mitigation, patrol inspections, and hazardous tree removal practices.
- b) Clarify how these mitigation initiatives are “enhanced,” exceeding the regulatory requirements it cited or alluded to throughout Section 7.3.5 “Vegetation Management and Inspections.” of its 2022 Update. If these mitigation initiatives are not “enhanced,” BVES must dispense with such language.

As part of these required remedies, BVES must also remedy RN-BVES-22-01 and RN-BVES-22-02.

## 4.5 Data Governance

### 4.5.1 RN-BVES-22-06: BVES has misinterpreted data management initiatives

In its 2022 Update, BVES misinterpreted 2022 WMP Guidelines requirements for Section 7.3.7 “Data Management,” resulting in under-reporting. For example, the 2022 WMP Guidelines define the “Centralized repository for data” initiative as:

Designing, maintaining, hosting, and upgrading a platform that supports storage, processing, and utilization of all utility proprietary data and data compiled by the utility from other sources.<sup>38</sup>

According to its 2022 Update, BVES interprets this initiative to be related only to Geographic Information System (GIS)-based applications. In Section 7.3.7.1 “Centralized repository for

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<sup>38</sup>2022 WMP Guidelines Attachment 2, p. 96.



data,” BVES states that “this initiative covers GIS-Based Application activities... this initiative is focused on gathering the required [Energy Safety] GIS feature datasets”<sup>39</sup>

BVES's interpretation of this initiative as limited to data collected and managed for its quarterly spatial data submissions is incorrect.

## Required Remedies

In its revised 2022 Update, Section 7.3.7 “Data Governance,” BVES must describe how it currently manages all data relevant to wildfire mitigation and any planned or ongoing improvements to these systems, in accordance with the 2022 WMP Guidelines. BVES should not limit the discussion to the provision of quarterly spatial data required by Energy Safety.

As part of these required remedies, BVES must also remedy RN-BVES-22-02.

## 4.6 Resource Allocation Methodology

### 4.6.1 RN-BVES-22-07: BVES does not describe how quantifiable risk reductions and RSE estimates inform initiative selection

BVES lacks transparency regarding its decision-making process and does not provide an explanation of where quantifiable factors such as costs, risk reduction values and RSE estimates are considered in each initiative selection. This is not in accordance with the 2022 WMP Guidelines,<sup>40</sup> which direct the following:

Discuss how risk modeling outcomes are used to inform decision-making processes and used to prioritize mitigation activities. Provide detailed descriptions including clear evaluation criteria and visual aids (such as flow charts or decision trees). Provide an appendix (including use of relevant visual aids) with specific examples demonstrating how risk modeling outcomes are used in prioritizing circuit segments and selecting mitigation measures.

## Required Remedies

In the relevant WMP section(s) of its revised 2022 Update, BVES must provide:

- a) An overview of its decision-making framework that includes the rankings of relative decision-making factors (e.g., planning and execution lead times, resource

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<sup>39</sup> BVES's 2022 WMP Update, pp. 218-219.

<sup>40</sup> 2022 WMP Guidelines, Attachment 2, Section 7.1 B.

constraints, etc.) and pinpoints where quantifiable risk reductions and RSE estimates are considered in the initiative selection process.

- b) A cascading, dynamic “if-then” style flow chart to effectively demonstrate this prioritization process.<sup>41</sup>

## 4.7 Emergency Planning and Preparedness

### 4.7.1 RN-BVES-22-08: BVES uses vague language to describe its service restoration workforce

BVES does not provide details or information on what hiring, retaining, and training practices it engages in or has implemented as it relates to BVES's service restoration workforce. Instead, in Section 7.3.9.1 “Adequate and trained workforce for service restoration” of its 2022 Update, BVES vaguely states that it has “taken actions to identify, hire, retain, and train qualified workforce to conduct service restoration in response to emergencies, including short-term contracting strategy and implementation.”<sup>42</sup>

The 2022 WMP Guidelines require that BVES “report detailed information for each initiative.”<sup>43</sup> Additionally, Deficiency Guidance-8, Class C, “Prevalence of equivocating language – failure of commitment,” requires BVES (and all electrical corporations) to “[d]ispense with empty rhetoric and not use terms that are ambiguous, misleading, or otherwise have the result of diluting commitments.”<sup>44</sup>

The vague language BVES's uses in this section prevents Energy Safety from understanding the specific details on BVES's hiring and training practices (as well as its contracting strategy) that ensure BVES has a workforce trained to respond to emergencies.

### Required Remedies

In Section 7.3.9.1 of its revised 2022 Update, BVES must:

- a) Provide information on, and specific examples of, hiring and retention practices and policies as they relate to BVES's service restoration workforce, including any

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<sup>41</sup> For an example of an “if-then” style flow chart (otherwise known as a “decision tree”) visit <https://hbr.org/1964/07/decision-trees-for-decision-making>

<sup>42</sup> BVES's 2022 Update, p. 224.

<sup>43</sup> 2022 WMP Guidelines, Attachment 2, p. 74.

<sup>44</sup> Resolution WSD-002, p. 26. This document can be found at: <https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2020/docs/340859823.pdf>.

information on worker titles, qualifications, certification requirements, and current numbers of BVES's service restoration employees.

- b) Provide information on its training program for service restoration workforce, including details on when employees are required to complete trainings and what specific training BVES provides.
- c) Provide information on its short-term contracting strategy and what this strategy entails.

As part of these required remedies, BVES must also remedy RN-BVES-22-02.

## **4.8 Stakeholder Cooperation and Community Engagement**

### **4.8.1 RN-BVES-22-09: BVES uses vague language to describe United States Forest Service and fuel reduction cooperation activities**

Similar to issue RN-BVES-22-08, BVES does not provide details or information in regard to what specific strategies it is implementing or what actions it is taking to improve its engagement with the United State Forest Service and fuel reduction stakeholders. Instead, BVES uses vague language in Section 7.3.10.4 of its 2022 Update “Forest service and fuel reduction cooperation and joint roadmap,” stating that it is “implementing strategies and taking actions to continue to improve engagement with local, state, and federal entities responsible for or participating in forest management and fuel reduction activities; and design utility cooperation strategy and joint stakeholder roadmap (plan for coordinating stakeholder efforts for forest management and fuel reduction activities).”<sup>45</sup>

The 2022 WMP Guidelines require that BVES “report detailed information for each initiative.”<sup>46</sup> Additionally, Deficiency Guidance-8, Class C, “Prevalence of equivocating language – failure of commitment,” requires BVES (and all electrical corporations) to “[d]ispense with empty rhetoric and not use terms that are ambiguous, misleading, or otherwise have the result of diluting commitments.”<sup>47</sup>

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<sup>45</sup> BVES's 2022 Update, p. 238.

<sup>46</sup> 2022 WMP Guidelines, Attachment 2, p. 74.

<sup>47</sup> Resolution WSD-002, p. 26. This document can be found at: <https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2020/docs/340859823.pdf>.

## Required Remedies

In Section 7.3.10.4 of its revised 2022 Update, BVES must:

- a) Provide information on and specific examples of its “strategies” and “actions” to engage with forest management and fuel reduction stakeholders, including with which entities and stakeholders BVES is currently engaging.
- b) Provide information on its utility cooperation strategy and joint stakeholder roadmap, including the progress and current status of this strategy/roadmap, as well as which stakeholders are involved.

As part of these required remedies, BVES must also remedy RN-BVES-22-02.

## 4.9 Public Safety Power Shutoff (PSPS)

### 4.9.1 RN-BVES-22-10: BVES does not describe how its PSPS planning has evolved

In its 2022 WMP Update, BVES does not describe what measures it is taking to improve its PSPS planning, nor provide justification for why its current plan remains adequate. Section 8.3 of Energy Safety's Final 2022 WMP Guidelines requires the utility to “describe organization-wide plan to reduce scale, scope, and frequency of PSPS for each of the following time periods, highlighting changes since the prior WMP report and including key program targets used to track progress over time, [b]y June 1 of current year, [b]y September 1 of current year, and [b]y next WMP submission.”

In describing how it will evolve its PSPS planning “by September 1 of current year,” and “by next WMP submission,” BVES states “BVES does not anticipate a need to develop an organization-wide plan to reduce the scale, scope, and frequency of PSPS impacts by this timeframe beyond the recently adopted PSPS Plan. The current protocols outlined in the PSPS Plan are reasonable and suitable for this period.” BVES does not demonstrate how it improved PSPS planning, how it plans to continue to improve PSPS planning, nor provide strong rationale for why its current plan still suffices.

Instead of describing how it is evolving its own planning efforts and learning from those of its peers, BVES directs the reader to its PSPS Plan, attached to its WMP as Appendix B, which does not address the Guideline requirements directly. BVES indicates that its Plan was last revised on February 24, 2021. As provided, this section does not highlight changes since the prior WMP or include key program targets used to track progress over time.

With regard to lessons learned, BVES states “BVES will endeavor to follow lessons learned across California regarding the use of PSPS and will update its PSPS Plan and Emergency



Response Plan accordingly.”<sup>48</sup> Energy Safety notes that multiple PSPS events occurred throughout the state in 2021 and BVES should have incorporated lessons learned from other utilities into an update of its PSPS Plan. Further, Energy Safety concurs with the CPUC Public Advocates’ comments on BVES’ 2022 Update<sup>49</sup> which note:

In its PSPS Plan (attached to its WMP as Appendix B), BVES lists the decisions that inform its PSPS plan.<sup>50</sup> Missing from this list is the Phase 3 Decision (D.21-06-034) adopted in the de-energization rulemaking in June of 2021.<sup>51</sup> BVES acknowledges it is still in the process of updating its PSPS plan and protocols to align with the Phase 3 PSPS guidelines, but states that this alignment will be complete at some point in “mid-2022.”<sup>52</sup>

In addition, BVES reports it is conducting internal exercises in preparation for a potential PSPS and updating its Plan with lessons learned from these as well. BVES’s updated PSPS Plan will soon be available and should be provided to Energy Safety.

## Required Remedies

In the relevant WMP section(s) of its revised 2022 Update, BVES must:

- a) Provide more information to describe how its planning has evolved, as specified by Section 8.3 of the Guidelines. This should include lessons learned from other utilities and internal exercises, and how those were used to update its PSPS Plan.
- b) File a revised PSPS Plan within 30 days of Energy Safety’s Decision on BVES’s 2022 Update integrating the requirements of D.21-06-034.<sup>53</sup>

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<sup>48</sup> BVES’s 2022 Update, p. 263.

<sup>49</sup> Comments of the Public Advocate’s Office on the 2022 Wildfire Mitigation Plan Updates of the Small Investor-Owned Utilities, June 20, 2022.

<sup>50</sup> BVES’s 2022 Update, pp. B-4 to B-5.

<sup>51</sup> Decision (D.) 21-06-034 *Adopting Phase 3 Revised and Additional Guidelines and Rules for Public Safety Power Shutoffs (Proactive De-Energizations) of Electric Facilities to Mitigate Wildfire Risk Caused by Utility Infrastructure* in Rulemaking 18-12-005, issued June 24, 2021.

<sup>52</sup> BVES’s 2022 Update, p. 239.

<sup>53</sup> Decision (D.) 21-06-034 *Adopting Phase 3 Revised and Additional Guidelines and Rules for Public Safety Power Shutoffs (Proactive De-Energizations) of Electric Facilities to Mitigate Wildfire Risk Caused by Utility Infrastructure* in Rulemaking 18-12-005, issued June 24, 2021.

## 5. Conclusion and Next Steps

Within 30 days after issuance of this Revision Notice, on or before August 22, 2022, BVES must provide:

- A response to all critical issues using naming convention “YYYY-MM-DD\_BVES\_22\_RNR\_R0”;<sup>54</sup> and
- A revised version of its 2022 Update that includes any changes to the 2022 Update resulting from responding to the Revision Notice, in both a clean and redlined version of the document. Use the naming convention “YYYY-MM-DD\_BVES\_22\_WMP-Update\_R1”<sup>55</sup> and “YYYY-MM-DD\_BVES\_22\_WMP-Update\_R1-redline” respectively.

BVES should not be duplicative in its Revision Notice Response and revised 2022 Update. As appropriate, BVES should use the Revision Notice Response to cross-reference the exact section(s) where it has remedied critical issues in its revised 2022 Update.

BVES must submit its Revision Notice Response and revised 2022 Update via email to the Energy Safety Deputy Director. In addition, BVES's Revision Notice Response and revised 2022 Update must be submitted to the 2022 Wildfire Mitigation Plan Updates docket (#2022-WMPs).<sup>56</sup> BVES must concurrently serve its Revision Notice Response on the California Department of Forestry and Fire Protection (CAL FIRE) at [CALFIREUtilityFireMitigationUnit@fire.ca.gov](mailto:CALFIREUtilityFireMitigationUnit@fire.ca.gov).

For each of the ten critical issues identified, Energy Safety sets forth specific remedies that BVES must fully address and respond to within its Revision Notice Response. Failure to fully address and respond to each remedy within its Revision Notice Response by the designated date may result in denial of BVES's 2022 Update. Energy Safety will not accept any updates or errata to Revision Notice Responses after the due date.

Stakeholders may submit comments on BVES's Revision Notice Response within 20 calendar days of BVES's Revision Notice Response and revised 2022 WMP Update submission. Reply comments are due 10 calendar days thereafter and shall be limited to issues raised and representations made in opening comments of other stakeholders. Opening and reply

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<sup>54</sup> 2022 WMP Guidelines, Attachment 2, p. 7.

<sup>55</sup> 2022 WMP Guidelines, Attachment 2, p. 7.

<sup>56</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs>

comments must be submitted to the 2022 Wildfire Mitigation Plan Updates docket (#2022-WMPs).<sup>57, 58</sup>

The dates for this Revision Notice are:

Revision Notice issued by Energy Safety:	July 22, 2022
BVES's Revision Notice Response due:	August 22, 2022
Public Comments due:	September 12, 2022
Reply Comments due:	September 22, 2022
Draft Decision issued by Energy Safety:	October 17, 2022

Energy Safety will consider BVES's Revision Notice Response, revised 2022 Update, stakeholder comments, responses to data requests and the totality of the information before it to date in issuing a determination on BVES's 2022 Update pursuant to Pub. Util. Code Sections 8386(b) and 8386.3(a).



Melissa Semcer  
Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

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<sup>57</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs>.

<sup>58</sup> If any deadline falls on a weekend or holiday, the deadline will be moved to the following business day. Dates falling on a Saturday or holiday as defined in Government Code Section 6700 have been adjusted to the next business day in accordance with Government Code Section 6707.

# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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# Appendix A: Additional Issues

## Identified in the Final Action Statement on BVES's 2021 WMP Update

For the sake of tracking compliance with Revision Notice Issue RN-BVES-22-01, each additional issue below has been assigned a code.

### 4.1 Introductory Sections of the WMP

- ISSUE 4.1.A: Section 8386(c)(4) of the Public Utilities Code requires “A description of the metrics the electrical corporation plans to use to evaluate the plan’s performance and the assumptions that underlie the use of those metrics.” BVES minimally meets this requirement by providing performance metrics and underlying data within WMP Tables 1-10. However, BVES does not provide descriptions of the metrics and does not include the “assumptions that underlie the use of those metrics.” Without these discussions, it is difficult to evaluate BVES’s progress in collecting and analyzing performance metrics.
  - REMEDY: BVES must provide the discussion required by Section 8386(c)(4) of the Public Utilities Code in Section 6, “Performance Metrics and Underlying Data.”
- ISSUE 4.1.B: Section 8386(c)(5) of the Public Utilities Code requires “a discussion of how the application of previously identified metrics to previous plan performances has informed the plan.” This requirement was addressed in Section 4.1 of BVES’s 2021 WMP Update but could be more complete.
  - REMEDY: BVES must provide more details on lessons learned from the previous WMP submission, with particular focus on how performance against metrics used has informed the 2022 WMP Update.

### 4.4 Inputs to the Plan and Direction Vision for the WMP

- ISSUE 4.4.A: BVES fails to “Provide a summarized report detailing the overall percentage of FTEs with qualifications listed in (2) for each of the target roles.”<sup>59</sup> These qualifications include: “Going beyond a basic knowledge of General Order 95 requirements... Being a ‘Qualified Electrical Worker’ (QEW)... [and] being an

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<sup>59</sup> WSD-011 Attachment 2.2, 2021 Wildfire Mitigation Plan Guidelines Template, p. 30.

International Society of Arboriculture (ISA) Certified Arborist with specialty certification as a Utility Specialist.”<sup>60</sup>

- REMEDY: BVES must adhere to the WMP Guidelines and include “a summarized report detailing the overall percentage of FTEs with qualifications listed in (2) for each of the target roles”<sup>61</sup> in Section 5.4 (or similar).

## 5.2 Situational Awareness and Forecasting

- ISSUE 5.2.A: BVES continues to discuss the installation of fiber optic communications in its service territory as a foundational investment to enable advanced technologies such as, wire down detection, rapid earth fault current limiter, and diagnostic technologies. However, BVES does not adequately address the conditions outlined by BVES-R5 (Class C). It remains unclear whether BVES is implementing a Down Wire Detection program or is still monitoring commercial development of Down Wire Detection technology.
  - REMEDY: BVES must a) describe whether it currently has a Down Wire Detection Installment Program, b) provide a timeline for development and implementation of this program if it does, c) if it does not, clarify whether BVES intends to develop a Down Wire Detection Installment Program and provide a timeline, and d) describe how it intends to measure the effectiveness of Down Wire Detection technology.

## 5.3 Grid Design and System Hardening

- ISSUE 5.3.A: BVES does not currently have a plan to directly address capacitor maintenance, instead relying on current maintenance practices. BVES states that it plans to evaluate capacitors in 2022 as well as a Capital Expenditure (CAPEX) plan in 2023,<sup>62</sup> but fails to provide any details on how that will differ from its current maintenance efforts.
  - REMEDY: BVES must provide its 2022 and 2023 plans for capacitor replacement and maintenance, including details on how such differs from routine maintenance practice.
- ISSUE: BVES states that it “has an ongoing program to assess and remediate noncompliant distribution poles” but does not provide any actual details on what that

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<sup>60</sup> WSD-011 Attachment 2.2, 2021 Wildfire Mitigation Plan Guidelines Template, p. 30.

<sup>61</sup> WSD-011 Attachment 2.2, 2021 Wildfire Mitigation Plan Guidelines Template, p. 30.

<sup>62</sup> BVES 2021 WMP Update Revision – Redlined, p. 110.

program consists of, if it differs outside of routine GO 95 and 165 efforts, or how BVES actually plans on targeting “priority pole replacements and remediations.”<sup>63</sup>

- REMEDY: BVES must explain its distribution pole replacement and remediation program, including how BVES identifies, targets, and prioritizes the highest-risk poles; and how BVES defines a “priority pole replacement and remediation.”<sup>64</sup>
- ISSUE 5.3.B: BVES plans on addressing its remaining conventional fuse replacements when performing other work in order to combine efforts and lower costs. While this could be more cost effective, it is not clear that this option will adequately cover the remaining conventional fuse replacements. Additionally, BVES has not shown that the completed replacements encompass the fuses identified as highest risk.
  - REMEDY: BVES must (a) demonstrate that its future fuse replacement efforts will adequately account for remaining fuses, (b) show that BVES is properly tracking fuse replacements, and (c) demonstrate that the highest risk fuses have either already been replaced or are scheduled to be replaced. If BVES finds that its current plan does not adequately account for remaining fuse replacements, it must develop a plan to properly track and replace fuse replacements moving forward, including enhancing current replacement efforts.
- ISSUE 5.3.C: BVES states that its “current SCADA system is inadequate,” and that it has established a Grid Automation Project, but the actual details on what this project entails are rudimentary. Aspects such as Wire Down Detection Relay Installation, Rapid Earth Fault Current Limiter (REFCL), and On-line Diagnostic Technology are not directly being explored and utilized by BVES, but instead holding out to observe the success of the pilots completed by the larger IOUs to determine which technology to move forward with.
  - REMEDY: BVES must (a) provide the details and locations for SCADA implementation by BVES, and (b) explain and update how BVES is monitoring pilot programs being performed by IOUs, including BVES’s plan on how and when to decide which technologies to move forward with.
- ISSUE 5.3.D: BVES’s does not explain details on how its current operations covers maintenance of hotline clamps.
  - REMEDY: BVES must either (a) show that its current inspection program adequately tracks and maintains hotline clamps, particularly in highest risk

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<sup>63</sup> BVES 2021 WMP Update Revision - Redlined, p. 118.

<sup>64</sup> BVES 2021 WMP Update Revision – Redlined, p. 118.

areas, or (b) establish a plan to adequately account for hotline clamp maintenance, repairs, and replacements.

- ISSUE 5.3.E: BVES's does not provide details on its future tree attachment removals
  - REMEDY: BVES must (a) provide the estimated planned tree attachment removals by year from 2021 to 2026, and (b) explain how BVES is prioritizing the removals of highest risk tree attachments.

## 5.4 Asset Management and Inspections

- ISSUE 5.4.A: BVES does not currently tailor its detailed inspections to specifically target wildfire risk, instead relying on its existing GO 165 five-year inspections. BVES also has no plans to modify, monitor, nor audit the existing inspection program, although vaguely references that it “applies annual lessons learned or identified improvements and tracks developing inspection practices in the industry.”<sup>65</sup> BVES does not explain how it goes about these improvements, and does not provide any examples.
  - REMEDY: BVES must (a) evaluate its current detailed inspection program to determine the effectiveness it has in monitoring equipment and situations specific to wildfire risk, (b) provide details on how it tracks annual lessons and industry-based improvements to its detailed inspections, including any improvements made in 2020 and 2021, and (c) augments its current detailed inspection program to specifically target assets and areas known to have higher wildfire risk.

## 5.5 Vegetation Management and Inspections

- ISSUE 5.5.A: BVES uses the term “Enhanced Vegetation Management” (EVM) to describe numerous aspects of its VM program: fuel reduction,<sup>66</sup> “collaborative measures with the USFS,”<sup>67</sup> “off-schedule” risk-based inspections and VM activities,<sup>68</sup> the contracting of a full-time utility forester,<sup>69</sup> at-risk species remediation,<sup>70</sup> strike

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<sup>65</sup> BVES 2021 WMP Update Revision – Redlined, p. 137.

<sup>66</sup> BVES 2021 WMP Update Revision – Clean, p. 46 and p. 158.

<sup>67</sup> BVES 2021 WMP Update Revision – Clean, p. 88.

<sup>68</sup> BVES 2021 WMP Update Revision – Clean, p. 156.

<sup>69</sup> BVES 2021 WMP Update Revision – Clean, p. 159.

<sup>70</sup> BVES 2021 WMP Update Revision – Clean, p. 160.

potential tree removal,<sup>71</sup> its vegetation inventory system,<sup>72</sup> and equipment clearances.<sup>73</sup>

- REMEDY: BVES must use the term “EVM” more deliberately and align its definition of EVM with its peer utilities.
- ISSUE 5.5.B: In Section 7.3.5.20, BVES states that it “currently does not remove trees on hillsides.”<sup>74</sup> As such, Energy Safety is concerned that BVES is not meeting the requirements of General Order (GO) 95, Rule 35 particularly regarding the removal of “dead, rotten or diseased trees... [that] may fall into a span of supply or communication lines.”
  - REMEDY: BVES must clarify how it is meeting the requirements of GO 95, Rule 35 while choosing to not remove trees on hillsides.
- ISSUE 5.5.C: Condition BVES-R2 requires BVES to “provide detailed information on its fuels management and slash reduction practices.”<sup>75</sup> Instead of describing its own fuels management practices, BVES instead discusses fuels management activities performed by other entities including Big Bear Fire Department and Bear Valley Community Service District.<sup>76</sup> While it is laudable that the Big Bear Valley Community as a whole is addressing fuels management issue, Energy Safety expects BVES to detail its own fuels management activities and how it has contributed to the community fuels management activities it describes. BVES states that fuels management activities are required “by GOs and applicable standards.”<sup>77</sup> General Orders (GOs) do not mention fuels and “slash” management; instead, these standards are outlined by the Board of Forestry’s Forest Practice Rules and Public Resources Code 4293; as such, Energy Safety is concerned that BVES is not implementing “applicable standards.”
  - REMEDY: In Section 7.3.5.5, BVES must provide detailed information on its fuels management and slash reduction practices including methods used and destination of downed woody debris (e.g., biomass energy facility, landfill, etc.).

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<sup>71</sup> BVES 2021 WMP Update Revision – Clean, p. 161.

<sup>72</sup> BVES 2021 WMP Update Revision – Clean, p. 163.

<sup>73</sup> BVES 2021 WMP Update Revision – Clean, p. 164.

<sup>74</sup> BVES 2021 WMP Update Revision – Clean, p. 166.

<sup>75</sup> Resolution WSD-013, Appendix A, p. A6.

<sup>76</sup> BVES 2021 WMP Update Revision – Clean, p. 149.

<sup>77</sup> BVES 2021 WMP Update Revision – Clean, p. 153.



- REMEDY: In Section 7.3.5.5, BVES must provide the number of poles it cleared in 2021 in accordance with Public Resources Code 4293.
- ISSUE 5.5.D: BVES-R7 requires BVES to discuss its system for tracking the compliance status of trees. Energy Safety acknowledges that BVES is still developing GIS and data tracking capabilities; BVES even states that vegetation management activities “will be tracked in BVES’s tree tracking program.”<sup>78</sup> However, BVES does not demonstrate progress towards developing and implementing a tree tracking program and instead uses equivocating language stating, in regards to a vegetation inventory system, “BVES plans to integrate the contracted forester services into BVES vegetation management operations in the next year.”<sup>79</sup>
  - REMEDY: BVES must detail its plan to develop and implement its tree tracking program.
  - REMEDY: BVES must, in accordance with the conditions of BVES-R2, demonstrate how it *currently* tracks its trees or groups of trees to ensure they are treated according to an appropriate schedule and appropriate specifications that ensure they do not pose a risk of wildfire, and whether this tracking documents the condition of trees to ensure they are maintained in proper condition over time.

## 5.6 Grid Operations and Operating Protocols

- ISSUE 5.6.A: BVES does not have specific crew designated for ignition prevention and suppression, instead relying on de-energizing work, and maintaining the ability to contract work out if deemed necessary. BVES did not provide details on the thresholds used to determine when ignition prevention and suppression work would be contracted.
  - REMEDY: BVES must provide details on the thresholds used to determine whether or not additional resources would be contracted for a project specific to ignition prevention and fire suppression.

## 5.8 Resource Allocation Methodology

- ISSUE 5.8.A: For many initiatives in Table 12 of its 2021 WMP Update, BVES states, “BVES has RSE calculations for its entire service territory, which is primarily Tier 2, some Tier 3 and no non-HFTD or Zone 1 areas. BVES will enhance its methodology to account for distinct RSE values for Tier 2 and Tier 3 in the future.” BVES must eliminate

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<sup>78</sup> BVES 2021 WMP Update Revision – Clean, p.166.

<sup>79</sup> BVES 2021 WMP Update Revision – Clean, p.164.

the usage of equivocating language, such as “*in the future*”, to make quantifiable, verifiable, and measurable commitments with respect to RSE improvements.

- REMEDY: BVES must provide quantifiable, verifiable, and measurable commitments to produce distinct RSE estimates for Tier 2 and Tier 3 HFTD in its 2022 WMP Update.
- ISSUE 5.8.B: For Capability 41c of the 2021 Maturity Survey, BVES selected “RSE estimates are verified by historical or experimental pilot data”<sup>80</sup> for 2021 and “RSE estimates are verified by historical or experimental pilot data and confirmed by independent experts or other utilities in CA”<sup>81</sup> for 2023. However, BVES does not provide details in its 2021 WMP Update regarding the verification of RSE estimates
  - REMEDY: BVES must provide all supporting data for the verification of RSE estimates.

## 5.9 Emergency Planning and Preparedness

- ISSUE 5.9.A: BVES does not adequately demonstrate progress and plans for next year in this mitigation initiative category.
  - REMEDY: BVES must discuss in detail its *progress on and future improvements to*<sup>82</sup> each of its Emergency Planning and Preparedness initiatives, without exclusively providing its planned spend or initiative budget.
- ISSUE 5.9.B: BVES does not demonstrate the adequacy of its service restoration workforce within its 2021 WMP Update.
  - REMEDY: BVES must discuss the type and number of personnel classifications it employs and the number of contractors in place for service restoration.
- ISSUE 5.9.C: While BVES claims to engage with customers and communities regarding wildfire safety and PSPS preparedness year-round to increase awareness and support wildfire mitigation activities, it does not explain how it collects stakeholder feedback

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<sup>80</sup> Utilities that submitted a WMP were required to complete a survey in which they answered specific questions which assessed their existing and future wildfire mitigation practices across 52 capabilities at the time of submission and at the end of the three-year plan horizon. The 52 capabilities are mapped to the same ten categories identified for mitigation initiatives. The results of the survey can be found in Attachment 11.1. The most recent survey for each utility can be found on the Energy Safety website here:

<https://www.energysafety.ca.gov>

<sup>81</sup> Ibid.

<sup>82</sup> WSD-011 Attachment 2.2, 2021 Wildfire Mitigation Plan Guidelines Template, Section 7.3.b requirement, subparts 4 and 5.

and how it incorporates them into both its community engagement efforts and wildfire mitigation planning.

- REMEDY: BVES must explain how it collects stakeholder feedback and how it incorporates feedback into both its community engagement efforts and wildfire mitigation planning.

## 5.10 Stakeholder Cooperation and Community Engagement

- ISSUE 5.10.A: BVES does not adequately demonstrate progress and plans for next year in this mitigation initiative category.
  - REMEDY: BVES must discuss in detail its *progress on* and *future improvements* to each of its Stakeholder Cooperation and Community Engagement initiatives.

## 6. Public Safety Power Shutoff (PSPS)

- ISSUE 6.A: BVES states that it is currently unable to project PSPS reduction metrics, indicating it “will assess the historical outlook of fire weather conditions over the last ten years and determine any instances where a PSPS activation would have been justified using BVES’s PSPS thresholds to assist in scenario development of forecasted risk.”
  - REMEDY: BVES must provide robust analysis projecting quarterly and yearly PSPS metrics, or an explanation of how it intends to develop this capability.
- ISSUE 6.B: BVES says it “will endeavor to follow lessons learned across California regarding the use of PSPS and will update its PSPS Plan and Emergency Response Plan accordingly.”<sup>83</sup> This statement does not articulate an adequately proactive approach toward testing and articulating effectiveness of its PSPS and Emergency Response plans in upcoming fire seasons.
  - REMEDY: BVES must describe how is has been testing its plan for effectiveness by potentially conducting emergency response exercises using its PSPS Plan and Emergency Response Plan and report on progress, lessons learned, and any resulting improvements to the PSPS and Emergency Response Plans based on application of the plan.
  - REMEDY: BVES must describe how its PSPS and Emergency Response Plans have been coordinated and developed, and tested jointly with SCE, as a critical

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<sup>83</sup> BVES 2021 WMP Update Revision – Clean, p. 206.

partner influencing PSPS Events ranked first in priority by BVES in “Table 8.1-1 Anticipated Characteristics of PSPS Use Over Next 10 Years.”<sup>84</sup>

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<sup>84</sup> BVES 2021 WMP Update Revision – Clean, p. 197.