



Bear Valley Electric Service, Inc.
P.O. Box 9028
San Dimas, CA 91773-9028
A Subsidiary of American States Water Company

August 29, 2022

Melissa Semcer
Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: BVES Response to the Office of Energy Infrastructure Safety Revision Notice

Dear Ms. Semcer,

Bear Valley Electric Service, Inc. (BVES) submits this response pursuant to Public Utilities Code Section 8389.3(a), and the July 22, 2022, Office of Energy Infrastructure Safety (Energy Safety) Issuance of Revision Notice (Notice).

In accordance with the direction issued by Energy Safety, BVES revised its 2022 Wildfire Mitigation Plan Update in accordance with the Notice to address critical issues identified by Energy Safety.

The table below demonstrates the issues identified and the location where each revision was made in response to the Notice.

<u>Issue ID</u>	<u>Issue</u>	<u>Applicable WMP Sections</u>
<u>RN-BVES-22-01</u>	<u>BVES has not responded to “Additional Issues”</u>	<u>4.6, Appendix A</u>
<u>RN-BVES-22-02</u>	<u>BVES has not provided adequate detail on mitigation initiative progress</u>	<u>7.1, 7.3</u>
<u>RN-BVES-22-03</u>	<u>BVES has not sufficiently connected its risk assessment with its mitigation initiative prioritization</u>	<u>7.1, 7.3.3</u>
<u>RN-BVES-22-04</u>	<u>BVES has not provided sufficient information on quality assurance & quality control (QA/QC)</u>	<u>7.3.4, 7.3.5</u>
<u>RN-BVES-22-05</u>	<u>BVES claims aspects of its vegetation management program are “enhanced” despite meeting only minimum regulatory requirements</u>	<u>7.3.5</u>
<u>RN-BVES-22-06</u>	<u>BVES has misinterpreted data management initiatives</u>	<u>7.3.7</u>
<u>RN-BVES-22-07</u>	<u>BVES does not describe how quantifiable risk reductions and RSE estimates inform initiative selection</u>	<u>7.1</u>
<u>RN-BVES-22-08</u>	<u>BVES uses vague language to describe its service restoration workforce</u>	<u>5.4</u>
<u>RN-BVES-22-09</u>	<u>BVES uses vague language to describe United States Forest Service and fuel reduction cooperation activities</u>	<u>7.3.5</u>

<u>RN-BVES-22-10</u>	BVES does not describe how its PSPS planning has evolved	7.3.6, 8.3
<u>RN-BVES-22-4.1.B</u>	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.	Table 4.1 1
<u>RN-BVES-22-4.4.A¹</u>	BVES fails to “Provide a summarized report detailing the overall percentage of FTEs with qualifications listed in (2) for each of the target roles.” ⁵⁹ These qualifications include: “Going beyond a basic knowledge of General Order 95 requirements... Being a ‘Qualified Electrical Worker’ (QEW)... [and] being an International Society of Arboriculture (ISA) Certified Arborist with specialty certification as a Utility Specialist.”	5.4
<u>RN-BVES-22-5.2.A</u>	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.	7.3.3
<u>RN-BVES-22- 5.3.A.1</u>	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, but fails to provide any details on how that will differ from its current maintenance efforts.	7.3.3,
<u>RN-BVES-22-5.3.A.2</u>	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 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.”	7.3.3
<u>RN-BVES-22-5.3.B</u>	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.	7.3.3
<u>RN-BVES-22-5.3.C</u>	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 Installment, 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	7.3.3

¹ This issue is considered closed according to an email from Colin Lang of Energy Safety on August 4, 2022.

	observe the success of the pilots completed by the larger IOUs to determine which technology to move forward with.	
<u>RN-BVES-22-5.3.D</u>	BVES ² s does not explain details on how its current operations covers maintenance of hotline clamps.	<u>7.3</u>
<u>RN-BVES-22-5.3.E</u>	BVES ² s does not provide details on its future tree attachment removals	<u>7.3.3</u>
<u>RN-BVES-22-5.4.A</u>	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.” BVES does not explain how it goes about these improvements, and does not provide any examples.	<u>7.3.4</u>
<u>RN-BVES-22-5.5.A</u>	BVES uses the term “Enhanced Vegetation Management” (EVM) to describe numerous aspects of its VM program: fuel reduction, “collaborative measures with the USFS,” “off-schedule” risk-based inspections and VM activities, the contracting of a full-time utility forester, at-risk species remediation, strike potential tree removal, its vegetation inventory system, and equipment clearances.	<u>7.3.5</u>
<u>RN-BVES-22-5.5.B</u>	In Section 7.3.5.20, BVES states that it “currently does not remove trees on hillsides.” 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.”	<u>7.3.5</u>
<u>RN-BVES-22-5.5.C</u>	Condition BVES-R2 requires BVES to “provide detailed information on its fuels management and slash reduction practices.” ⁷⁵ 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. ⁷⁶ 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.” ⁷⁷ 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.”	<u>7.3.5</u>
<u>RN-BVES-22-5.5.D</u>	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.” ⁷⁸ However, BVES does not demonstrate progress towards developing and implementing a tree tracking program and instead uses equivocating language	<u>7.3.5, 7.3.7</u>

	<u>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.”⁷⁹</u>	
<u>RN-BVES-22-5.-6.A</u>	<u>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.</u>	<u>7.3.6</u>
<u>RN-BVES-22-5.8.A</u>	<u>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 the usage of equivocating language, such as “in the future”, to make quantifiable, verifiable, and measurable commitments with respect to RSE improvements.</u>	<u>4.5.1</u>
<u>RN-BVES-22-5.8.B</u>	<u>For Capability 41c of the 2021 Maturity Survey, BVES selected “RSE estimates are verified by historical or experimental pilot data”⁸⁰ for 2021 and “RSE estimates are verified by historical or experimental pilot data and confirmed by independent experts or other utilities in CA”⁸¹ for 2023. However, BVES does not provide details in its 2021 WMP Update regarding the verification of RSE estimates</u>	<u>4.5.1</u>
<u>RN-BVES-22-5.9.A</u>	<u>BVES does not adequately demonstrate progress and plans for next year in this mitigation initiative category</u>	<u>7.3.9</u>
<u>RN-BVES-22-5.9.B</u>	<u>BVES does not demonstrate the adequacy of its service restoration workforce within its 2021 WMP Update.</u>	<u>7.3.9, 5.4</u>
<u>RN-BVES-22-5.9.C</u>	<u>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 and how it incorporates them into both its community engagement efforts and wildfire mitigation planning.</u>	<u>7.3.9, 7.3.10</u>
<u>RN-BVES-22-5.10.A</u>	<u>BVES does not adequately demonstrate progress and plans for next year in this mitigation initiative category.</u>	<u>7.3.10;</u>
<u>RN-BVES-22-6.A</u>	<u>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.”</u>	<u>8.1</u>
<u>RN-BVES-22-6.B</u>	<u>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.”⁸³ 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.</u>	<u>7.3.9,-8</u>

Sincerely,

Paul Marconi
President, Treasurer, & Secretary