



September 29, 2022

To: Bear Valley Electric Service, Inc. (BVES)
Paul Marconi
President

SUBJECT: Office of Energy Infrastructure Safety's Report on BVES's 2020 Substantial Vegetation Management Audit

Pursuant to the requirements of California Public Utilities Code Section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) has completed its final report on BVES's 2020 Substantial Vegetation Management (SVM) audit.

The attached report follows Energy Safety's publication of the SVM audit on August 26, 2022, and BVES's subsequent response on September 26, 2022. Pursuant to statutory requirements, a copy of this report is issued to BVES, published on Energy Safety's website,¹ and provided to the California Public Utilities Commission (CPUC).

Sincerely,

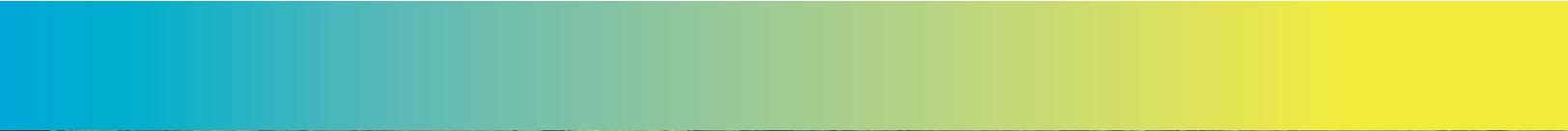
A handwritten signature in black ink, appearing to read "Koko Tomassian". The signature is written in a cursive style and is positioned above a horizontal line.

Koko Tomassian
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety

Cc:
Edward Chavez, Energy Safety
Gary Candelas, Energy Safety
Forest Kaser, CPUC
Leslie Palmer, CPUC

Attachment: BVES 2020 SVM Audit Report

¹ All documents related to BVES's 2020 SVM audit are available on Energy Safety's e-filing system under the "[2020-SVM](#)" docket number.



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**OFFICE OF ENERGY INFRASTRUCTURE SAFETY'S
REPORT ON 2020 SUBSTANTIAL
VEGETATION MANAGEMENT AUDIT**
Bear Valley Electric Service, Inc.

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1. BACKGROUND

Pursuant to Public Utilities Code section 8386.3(c)(5), Energy Safety must audit the vegetation management work performed by, or on behalf of, the electrical corporation. The audit shall specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the wildfire mitigation plan. Energy Safety then grants the electrical corporation a reasonable time to correct and eliminate any deficiency specified in the audit. After evaluation of the electrical corporation's response correcting or eliminating the deficiencies, Energy Safety must issue a report specifically describing any failure of the electrical corporation to substantially comply with the substantial portion of the vegetation management requirements in the electrical corporation's wildfire mitigation plan. This document is Energy Safety's final vegetation management report.

To conduct the 2020 Substantial Vegetation Management (SVM) audit, Energy Safety reviewed the vegetation management section and initiatives in Bear Valley Electric Service's (BVES) 2020 Wildfire Mitigation Plan (WMP). For each of the 20-vegetation management WMP initiatives, Energy Safety evaluated BVES's quantitative commitments¹ and verifiable statements.² For most initiatives, BVES made multiple quantitative commitments and verifiable statements. Energy Safety then reviewed available information and requested additional documentation to support the assessment of whether BVES fully met its quantitative commitments and executed its verifiable statements.

Out of approximately 21 commitments and verifiable statements evaluated, Energy Safety found BVES noncompliant with two commitments and verifiable statements, resulting in three of the 20 vegetation management initiatives being non-compliant in its 2020 WMP.³

On August 26, 2022, Energy Safety published its 2020 SVM Audit⁴ identifying BVES's vegetation management failures, specified a Corrective Actions required to resolve or explain the failures,

¹ E.g., miles of lines to inspect, minimum work quality thresholds, etc.

² E.g., holding public meetings with communities regarding future vegetation management activities, training personnel on utilities protocols, etc.

³ One noncompliant statement is tied to initiative 5.3.5.2. Initiative 5.3.5.20 directs readers back to initiative 5.3.5.2. Therefore, BVES's noncompliance with 5.3.5.2 pertains to two separate vegetation management initiatives.

⁴ BVES 2020 SVM Audit is published on Energy Safety's e-filing system in the 2020 WMP Substantial Vegetation Management Audits docket and available here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2020-SVM> (accessed on September 27, 2022).

and required BVES to provide a Corrective Action response. On September 26, 2022, BVES timely provided its Corrective Action response and included supporting documentation.⁵

2. 2020 SVM AUDIT FINDINGS

Table 1 below summarizes Energy Safety’s findings from BVES’s 2020 SVM Audit.

Table 1: Noncompliant 2020 WMP Vegetation Management Initiatives and Corresponding Findings

Noncompliant Initiative Number	Finding
5.3.5.2 ⁶	1. BVES failed to have an internal plan for its vegetation management programs prior to contracting out to contractors.
5.3.5.14	2. BVES failed to hire a contractor utility forester in 2020.

3. ANALYSIS OF BVES’S RESPONSE

In a “general response” to the findings, BVES stated “BVES Operations and Planning Group has been trained to ensure vegetation management operations are consistent with statements made in [both] initiatives of the WMP. Each quarter... BVES staff will review the status of fully

⁵ BVES 2020 SVM Audit Corrective Action Plan is published on Energy Safety’s e-filing system in the 2020 WMP Substantial Vegetation Management Audits docket and available here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2020-SVM> (accessed on September 27, 2022).

⁶ Noncompliant of 5.3.5.20 is included in this finding

implementing commitments made in the current WMP for each initiative and take action to keep them on track, if necessary.”⁷

In addition to the response above, Energy Safety also reviewed BVES’s Corrective Action response and determined that BVES sufficiently addressed all Corrective Actions. Table 2 presents Energy Safety’s analysis and determination.

Table 2: Summary of Energy Safety's Analysis of BVES's Response and Corrective Action

Corrective Action	Energy Safety’s Analysis of Response
<p>1. BVES shall a) provide the steps it is taking or has taken to ensure it has an internal vegetation management plan, and b) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in this initiative of the WMP</p>	<p>Sufficient- BVES stated that it had an internal vegetation management plan, which was included in its “Fire Prevention Plan” and implemented in 2018. BVES stated that this was its vegetation management plan in effect during 2020. BVES provided a copy of its Fire Prevention Plan, training slides, and a memorandum documenting the implementation of the vegetation management plan.⁸ BVES also indicated that its staff will review the implementation status of the commitments made in the current WMP for each initiative and take actions to keep them on track.⁹ Energy Safety finds this response sufficiently addressed the Corrective Action.</p>
<p>2. BVES shall a) explain the reason why the contractor was not hired in 2020, and b) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in this initiative of the WMP</p>	<p>Sufficient- BVES stated that its forester contract was fully executed on December 22, 2020. However, the contractor was not able to provide a forester on site until March 2021.¹⁰ The process of getting the forester on site took several months due to selecting the forester and relocating the individual to Big Bear Lake. BVES stated that it will start the contracting process sooner than it</p>

⁷ BVES 2020 SVM Audit Corrective Action Plan, page 2 & 3

⁸ BVES 2020 SVM Audit Corrective Action Plan, page 2

⁹ BVES 2020 SVM Audit Corrective Action Plan, page 2

¹⁰ BVES 2020 SVM Audit Corrective Action Plan, page 2

Corrective Action	Energy Safety’s Analysis of Response
	normally does to maintain a forester on staff. ¹¹ BVES also indicated that its staff will review the implementation status of the commitments made in the current WMP for each initiative and take actions to keep them on track. ¹² Energy Safety finds this response sufficiently addressed the Corrective Action.

4. CONCLUSION

After reviewing BVES’s response to the Corrective Actions, Energy Safety finds that BVES sufficiently addressed both Corrective Actions. Energy Safety finds that BVES substantially complied with the substantial portion of the vegetation management requirements in its 2020 WMP.¹³

¹¹ BVES 2020 SVM Audit Corrective Action Plan, page 3

¹² BVES 2020 SVM Audit Corrective Action Plan, page 2

¹³ Pub. Util. Code, § 8386.3(c)(5)(C).

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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