BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Office of Energy Infrastructure Safety
Natural Resources Agency

REPLY COMMENTS OF BEAR VALLEY ELECTRIC SERVICE. INC. ON THE GREEN POWER INSTITUTE COMMENTS ON THE OEIS DRAFT DECISION ON BVES 2022 WMP UPDATE

Paul Marconi
President, Treasurer & Secretary
Bear Valley Electric Service, Inc.
42020 Garstin Dr.
PO Box 1547
Big Bear Lake, California 92315
Email: paul.marconi@bvesinc.com

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REPLY COMMENTS OF BEAR VALLEY ELECTRIC SERVICE. INC. ON THE GREEN POWER INSTITUTE COMMENTS ON THE OEIS DRAFT DECISION ON BVES 2022 WMP UPDATE

Bear Valley acknowledges Green Power Institute (GPI) concerns regarding risk modeling. As indicated in BVES's 2022 WMP Update, BVES engaged an expert risk modeling consultant, Technosylva, to address these issues and further improve Bear Valley's risk modeling capabilities and better support WMP initiative planning and prioritization.

Technosylva develops its Wildfire Analyst Enterprise (WFA-E) and Wildfire Risk Reduction Model (WRRM) application for Bear Valley. The WRRM utilizes FireSim modeling with historical climate data to derive risk metrics for individual assets to support asset hardening and mitigation planning. Furthermore, WRRM requires tight integration with company asset databases that incorporates information regarding asset characteristics, condition, equipment failure data and ultimately the determination of the probability of ignition for each individual asset. WRRM is typically used to support prioritization of assets for mitigation based on risk reduction. This provides the basis for calculating risk spend efficiency.

Dated December 5, 2022

Respectfully submitted

/s/ Paul Marconi

President, Treasurer & Secretary &
Bear Valley Electric Service, Inc.
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