



Bear Valley Electric Service, Inc.  
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A Subsidiary of American States Water Company

April 18, 2025

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**Subject: BVES Response to the Office of Energy Infrastructure Safety  
Pre-Submission Check Sufficiency Determination for Bear Valley Electric  
Service, Inc.'s 2026-2028 Wildfire Mitigation Plan Pre-Submission Letter**

Dear Mr. Tony Marino,

Bear Valley Electric Service, Inc. (BVES) submits this response pursuant to Public Utilities Code Section 8389.3(a), and the March 28, 2025, Office of Energy Infrastructure Safety (Energy Safety) Letter of Determination (Determination of Completeness).

In accordance with the direction issued by Energy Safety, BVES revised its 2026-2028 Wildfire Mitigation Plan (WMP) in accordance with the Letter of Determination (Determination of Completeness) to address incomplete information identified by Energy Safety.

The tables below provide the issues identified and the location where each revision was made in response to the Letter of Determination (Determination of Completeness).

Changes Made Per OEIS Letter of Determination:

Issue Section	Issue	Action Taken	Applicable Pages
WMP Guideline Instructions	In its pre-submission, BVES also included instructions from Energy Safety's draft WMP Guidelines instead of the adopted WMP Guidelines. If BVES chooses to keep instructions from the WMP	WMP Guidelines instructions were removed	Throughout the WMP

	Guidelines in its 2026-2028 WMP (which is not required), it should update the instructions to reflect the adopted version.		
Mitigation Activity Tracking IDs	BVES did not provide consistent unique tracking IDs for its mitigation activities. For example, BVES listed two mitigation activities for GD_23: Detailed Inspections and Patrol Inspections (page 173). Additionally, it used both GD_12 to GD-12 for Tree Attachment Removal Project. BVES must use unique tracking IDs consistently throughout all Energy Safety submissions (e.g., WMP, QDRs).	Tracking ID for Detailed Inspections corrected from GD_23 to GD_22 in Section 8.3 and on Figure 8-1. In Section 8.5.4. the following corrections were made to tracking IDs: GD-12 corrected to GD_12, GD-16 corrected to GD_16, GD-24 corrected to GD_24, GD-25 corrected to GD_25, GD-26 corrected to GD_26, and GD-28 corrected to GD_28.	PP. 142, 143, 162
Section 4.3 Section 9.13 Section 11.3.3	BVES did not provide cell values in Tables 4-3 Frequently Deenergized Circuits, 9-9 Vegetation Management Qualifications and Training, 11-7 Collaboration with Tribal Agencies, and 11-8 Key Gaps and Limitations in Collaborating with Tribal Agencies. BVES must provide a value for all table cells. When there is no value available, BVES must note in the table "N/A," "None," or another designation to acknowledge the lack of information is intentional.	"None" and "N/A" added to blank cells in Tables 4-3, 9-9, 11-7, and 11-8.	Pp. 32, 224, 271
Section 8.1	BVES provided blank cells for quarterly inspections targets Table 8-1 Grid Design, Operation, and Maintenance Targets. BVES must provide values for each cell. Quarterly targets for asset inspection must be provided in Table 8-2 Asset Inspection Frequency, Method, and Criteria. BVES may have followed the instructions from the draft WMP Guidelines instead of the adopted WMP Guidelines. BVES must either populate every cell in the quarterly target	Table 8-1 was updated to conform to the WMP Guidelines. Quarterly columns were removed. Blank cells were marked N/A. For clarity, qualitative targets were included in the "Target/Status" columns. No target values were changed.	P. 111

	columns in Table 8-1 Grid Design, Operation, and Maintenance Targets by Year or remove those columns.		
Section 9.1.2	BVES did not provide all the required columns in Table 9-2 Vegetation Management Inspection Frequency, Method, and Criteria. The missing columns are Activity (Program), Tracking ID, Previous Tracking ID, if applicable, and Target Unit. BVES must provide all required information in Table 9-2.	Table 9-2 was updated to include all columns in the table.	P. 180
Section 10.1	BVES did not provide both qualitative and quantitative targets for all of its Situational Awareness and Forecasting mitigation activities in Table 10-1 Situational Awareness Targets by Year. BVES must provide both qualitative and quantitative targets for all Situational Awareness and Forecasting mitigation activities in Table 10-1.	Qualitative targets were added for SAF_1, SAF_2, SAF_3, SAF_4, and SAF_7. Quantitative targets were added for SAF_5 and SAF_6. The qualitative targets for SAF_5 and SAF_6 were reformatted to be consistent with the example provided the WMP Guidelines for Table 10-1. Blank cells were marked N/A.	P. 228
Section 11.4.4	BVES referenced its Access and Functional Needs Plan but did not supply a link. BVES must provide links to, or attach, all supplemental documentation.	Link to AFN Plan added to Section 11.4.4	P. 284
Section 12.1.1	BVES did not provide qualitative targets for all the required mitigation initiatives in Table 12-1 Enterprise Systems Targets. BVES must add qualitative targets addressing weather forecasting and risk assessment mitigation initiatives in Table 12-1.	Qualitative targets added for initiatives for grid monitoring, ignition detection, weather forecasting, and risk assessment initiatives. Email from Energy Safety on April 1, 2025 agreed with including grid monitoring and ignition detection initiatives.	P. 291
Appendix D	BVES did not provide page numbers of improvements. BVES must provide page numbers of the improvements.	Page numbers were added to each Area for Continued Improvement (ACI). For some ACIs the specific section was also updated to provide better clarity where the improvement is addressed in the WMP.	Throughout Appendix D

Non-Substantive Changes:

Issue Section	Issue	Action Taken	Section & Page Number
Section 6.2.1.1	Figure 6-2 is misnumbered	Corrected number to Figure 6-1. Update "List of Figures" table of contents.	6.2.1.1, pg. 88
Section 11.4.4	AFN does not provide the acronyms full name	Added full name	11.4.4, pg. 281
Table 3-2 Self-Identified Performance Metrics	Blank cells	Added "N/A" to blank cells.	
Table 4-2 Catastrophic Electrical Corporation Wildfires	Blank cells	Added "None" and "N/A" to blank cells as applicable.	
Table 9-4 Partnerships in Vegetation Management	Blank cells	Added "N/A" to blank cells.	
Table 10-4 Fire Detection Systems Currently Deployed	Blank cells	Added "N/A" to blank cells.	
Table 13-2 Lessons Learned from Discontinued Activities	Blank cells	Added "N/A" to blank cells.	
Section 4.2	Name for Table 4-2 needs to be updated to "Catastrophic Electrical Corporation Wildfires"	Updated name to Table 4-2 to "Catastrophic Electrical Corporation Wildfires". Update "List of Tables" table of contents.	4.2, pg. 34
Section 5.7.4	Indent issue	Fixed indent issue	
Section 5.7.5	Indent issue	Fixed indent issue	
Section 6.1.1.2	Line space issue	Fixed line space issue	

Section 7.1	Line space issue	Fixed line space issue	
Appendix B	Reference to DIREXYON Phase 1 and 2 Model documentation was missing.	Added reference to DIREXYON Phase 1 and 2 Model documentation	Appendix B.
Appendix B	Reference to Technosylva Model documentation was not clear.	Clarified reference to Technosylva Model documentation	Appendix B.
Appendix D	BVES-23-01 Target Verification Methods needed to be updated to reflect the changes required by the Letter of Determination to Table 10-1.	The table providing the method of verification to the qualitative targets that were added for SAF_1, SAF_2, SAF_3, SAF_4, and SAF_7 and quantitative targets that were added for SAF_5 and SAF_6 was modified to include the new targets added to Table 10-1.	Appendix D.
TOC, Tables 8-1, 9-1, 10-1, 11-1, 12-1	Page numbers changed after removing the guidelines and making Non Substantitive Changes.	Refresh all Table of Contents. Update page numbers on Tables 8-1, 9-1, 10-1, 11-1, and 12-1.	TOC, Tables 8-1, 9-1, 10-1, 11-1, 12-1
Section 1, p. 15	Grammar check "Full Scale"	Correction "Full-Scale"	Section 1, p. 15
Section 3.7, p. 31	Grammar check "long lasting"	Correction "long-lasting"	Section 3.7, p. 31
Section 6.1.3, p. 79	Grammar check "In addition"	Correction "in addition,"	Section 6.1.3, p. 79
Section 6.1.3, p. 79	Grammar check "this initiatives"	Correction "these initiatives"	Section 6.1.3, p. 79
Section 7.3, p. 110	Grammar check "high risk"	Correction "high-risk"	Section 7.3, p. 110
Section 8.2.1, p. 117	Grammar check "high risk"	Correction "high-risk"	Section 8.2.1, p. 117
Section 8.2.1, p. 119	Grammar check "high risk"	Correction "high-risk"	Section 8.2.1, p. 119
Section 8.2.1, p. 119	Grammar check "more heavy"	Correction "heavier"	Section 8.2.1, p. 119
Section 8.2.2, p. 121	Grammar check "In fact"	Correction "In fact,"	Section 8.2.2, p. 121
Section 10.2.1, p. 232	Grammar check "are"	Correction "is"	Section 10.2.1, p. 232
Section 10.3.2, p. 236	Grammar check "risk based"	Correction "risk-based"	Section 10.3.2, p. 236

Section 10.4.2, p. 242	Grammar check "risk based"	Correction "risk-based"	Section 10.4.2, p. 242
Section 11.2.2, p. 263	Grammar check "may direct that certain"	Correction "may direct certain"	Section 11.2.2, p. 263
Section 11.4.4, p. 287	Grammar check "with with"	Correction "with"	Section 11.4.4, p. 287
Section 13.2, p. 303	Grammar check "so hearing from"	Correction "so, hearing from"	Section 13.2, p. 303
Appendix A, p. A-322	Grammar check "of of"	Correction "of"	Appendix A, p. A-322
Appendix B, p. B-351	Two bullet points items combined on one line	Split bullet point item to two lines	Appendix B, p. B-351
Appendix D, p. D-383	Grammar check "high risk"	Correction "high-risk"	Appendix D, p. D-383
Appendix D, p. D-389	Grammar check "circuit by circuit"	Correction "circuit-by-circuit"	Appendix D, p. D-389
Appendix D, p. D-389	Grammar check "risk based"	Correction "risk-based"	Appendix D, p. D-389
Table 9-9	Cell C4 error	Removed "Registered professional forester" from description	Table 9-9

BVES's Wildfire Mitigation Plan, and the associated documents, are available on BVES's website at the following link: <https://www.bvesinc.com/safety/wildfire-mitigation-plan>.

Sincerely,

/s/ Paul Marconi

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