



Bear Valley Electric Service, Inc.
P.O. Box 9028
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A Subsidiary of American States Water Company

June 6, 2025

Via Electronic Mail
Docket # 2026-2028-Base-WMPs

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814
Caroline.ThomasJacobs@energysafety.ca.gov

Subject: Reply Comments of Bear Valley Electric Service, Inc. 2026-2028 Wildfire Mitigation Plan

Dear Director Thomas Jacobs,

On May 30, 2025, one stakeholder, the Green Power Institute (GPI), submitted comments on Bear Valley Electric Service, Inc. (BVES or Bear Valley) 2026-2028 Wildfire Mitigation Plan (WMP). Pursuant to Section 4 of Office of Energy Infrastructure Safety (Energy Safety) Policy Division Process Guidelines (Process Guidelines), BVES submits these reply comments addressing some of the specific issues raised by GPI.

Bear Valley recognizes the benefits of an open and transparent WMP approval process and appreciates the external reviews and comments to its WMP. Bear Valley would like to re-emphasize its open invitation to the Green Power Institute and other stakeholders to visit Big Bear Lake to better understand the unique nature and condition of the BVES service territory and the inherent risks in our operations/service territory, our wildfire mitigation efforts, and the constraints BVES faces.

I. GPI's Comments and Responses

GPI Comment #1: Risk Assessment and Modeling: The link between updated risk modeling approaches, tools, and outputs and mitigation selection and prioritization.

BVES Response: Bear Valley agrees with GPI's assessment and will be working with Direxyon to build a more granular model which will have the capability to "establish a risk assessment method that tracks asset conditions such as age and health, and that informs proactive asset replacement based on these risk drivers."

GPI Comment #2: Risk Assessment and Modeling: BVES has been using and continues to use Technosylva to model their wildfire risk planning, but is working to expand their modeling Capabilities.

BVES Response: Bear Valley agrees with GPI's assessment and is committed to improving its risk modeling capabilities this year and throughout the 2026-2028 WMP period. BVES will continue its efforts with Direxyon and do so in regular consultation with OEIS and the Risk Modeling Working Group (RMWG).

GPI Comment #3: Risk Assessment and Modeling: Insufficient consideration of Ingress/Egress in risk assessments and modeling.

BVES Response: Bear Valley agrees with GPI's assessment and intends to align with the results of the ongoing discussion regarding ingress and egress considerations in the Risk Modelling Working Group (RMWG). BVES will explore ingress and egress with respect to wildfire vulnerability in future revisions of the Direxyon model.

GPI Comment #4: Wildfire Mitigation Strategy Development: Overall approach to mitigation.

BVES Response: Bear Valley agrees with GPI's assessments and comments in this section. BVES does intend to leverage its automation network and look to insert situational awareness and control technology to improve system operations.

GPI Comment #5: Public Safety Power Shutoff: Internal vs external origination, mitigations.

BVES Response: Bear Valley agrees with GPI's comments and recommendations. Bear Valley routinely collaborates with SCE regarding PSPS. For example, on May 22, 2025, the BVES Team involved in all aspects of PSPS visited SCE and had extensive discussions with SCE on PSPS criteria, customer notifications, meteorology, operational considerations, asset improvements, and lines of communications. Similarly, on June 24, 2024, the BVES Team met with counterparts at SDG&E to discuss their wildfire mitigation efforts and their PSPS processes.

GPI Comment #6: Grid Design, Operations, and Maintenance: Covered conductor vs. undergrounding.

BVES Response: Bear Valley agrees with GPI's assessments and comments in this section.

GPI Comment #7: Grid Design, Operations, and Maintenance: Encouraging the installation of local renewable generation and microgrids.

BVES Response: Bear Valley agrees with GPI's assessments and comments in this section. BVES notes that it has in the past collaborated with the City of Big Bear Lake's Water Department, the Big Valley Unified School District, and the Big Bear Area Regional Wastewater Agency to support their solar generation projects. The Bear Valley Community Hospital is planning a large modernization project and BVES will engage the Hospital to seek microgrid opportunities that would enhance their continuity of power.

GPI Comment #8: Grid Design, Operations, and Maintenance: Encouraging the adoption of EPSS.

BVES Response: Bear Valley agrees with GPI's assessments and comments in this section. As noted in Section 8.7.1.1 of BVES's 2026-2028 Base WMP, BVES is currently developing an EPSS operational policy and intends to begin implementing it in Q4 2025. Bear Valley is in the process of identifying which devices will be EPSS enabled. To GPI's point, all overhead systems will be included in the EPSS program. As BVES implements EPSS, it will prioritize bare conductor circuits to provide immediate ignition risk reduction.

GPI Comment #9: Vegetation Management: Management of operations and residuals.

BVES Response: Bear Valley agrees with GPI's comments. Bear Valley performs the following vegetation management inspections each year: Patrol Inspections (VM_2), UAV HD Photography/Videography Inspections (VM_3), LiDAR Inspections (VM_4), 3rd Party Ground Patrol Inspections (VM_5), Substation Inspections (VM_6) and Satellite Imaging Inspections (VM_7). These inspections are substantially beyond what is required by the Commission's General Orders. Detailed Inspections (VM_1) are performed every five years with high-risk sections being performed at least every three years. Bear Valley's use of UAV inspection on the entire system once per year is beyond state requirements and consistent with other utilities' practices. While there is always some benefit to conducting additional UAV inspections, the marginal gain relative to the cost is diminished; especially in light of the large number of inspections BVES already performs on an annual basis.

GPI Comment #10: Vegetation Management: Integration with overall forestry operations in the region.

BVES Response: Bear Valley agrees with GPI that working closely with the US Forest Service (USFS) to encourage and support forest safe operations and activities. Bear Valley intends to further its partnership with the USFS and support efforts for the USFS to perform wildfire risk reduction forestry operations on their acreage in the vicinity of BVES as an integrated risk management strategy.

GPI Comment #11: Emergency Preparedness, Collaboration, and Community Outreach: Plans for post fire restoration.

BVES Response: Bear Valley disagrees with GPI's recommendation for OEIS to order BVES to build a plan for this effort into the 2026-2028 WMP before it is deemed accepted. Bear Valley has already committed in its 2026-2028 WMP to further improving its post fire restoration plans throughout the period of the 2026-2028 WMP. Bear Valley has a communications plan in place that it would leverage during post fire restoration. Bear Valley has developed substantial outreach for collaboration on post fire restoration (and other emergency response and recovery efforts) through the Big Bear Valley Mountain Mutual Aid Association with the following local community organizations:

- Local officials (City of Big Bear Lake (CBBL) and San Bernardino County)
- San Bernardino County Office of Emergency Services (County OES)

- Big Bear Fire Department
- California Department of Forestry and Fire Protection (CAL FIRE)
- U.S. Forest Service
- San Bernardino County Sheriff's Department Big Bear Lake Patrol Station
- California Highway Patrol (CHP) Arrowhead Area
- California Department of Transportation (Caltrans)
- Big Bear Area Regional Wastewater Agency (BBARWA)
- Big Bear City Community Services District (CSD)
- Big Bear Lake Water Department (DWP)
- Big Bear Municipal Water District (MWD)
- Southwest Gas Corporation
- Bear Valley Community Hospital
- Bear Valley Unified School District
- Big Bear Chamber of Commerce
- Big Bear Airport District
- Big Bear Mountain Resort
- Various local media and communications companies (local radio station and newspaper both of which have online reporting services)

While BVES agrees that continuous improvement should be sought, community outreach should be pursued, and lessons learned from other utilities should be included in planning, making approval of Bear Valley's 2026-2028 WMP contingent on BVES providing a more detailed plan is unnecessary and overly burdensome.

II. Conclusion

BVES recognizes and has responded to the comments provided by GPI and provided additional clarity. BVES's WMP and its associated documentation is subject to continuous improvement and adaptation with the changing wildfire mitigation landscape from improved understanding of mitigation efforts and regulatory demands. BVES will continue to fortify its WMP programs especially in the areas of concern identified by public comment, and endeavor to address the issues noted in the next WMP cycle. In furtherance of these goals, BVES remains open to constructive discussions regarding WMP issues with interested parties and stakeholders.

Sincerely,

/s/ Paul Marconi

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