

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA**

Office of Energy Infrastructure Safety
Wildfire Safety Division

**COMMENTS OF THE GREEN POWER INSTITUTE
ON THE BVES 2026-2028 WMP DRAFT DECISION**

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The Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, provides these *Comments of the Green Power Institute on the BVES 2026-2028 WMP Draft Decision*.

Introduction

The GPI performed a review and analysis of the Bear Valley Electric Service (BVES) base 2026-2028 WMP and reported our findings to the OEIS on May 30, 2025. We were the only independent party to file comments, and we were generally supportive of the BVES document, while offering several important improvements. The Draft Decision approves and adopts BVES's base 2026-2028 WMP, while acknowledging our positions and in most cases ordering BVES to incorporate our proposals into the base document itself, or to adopt them over the course of the 2026-2028 WMP cycle. GPI supports adoption of the Draft Decision.

Risk Assessment and Modeling

The draft decision correctly acknowledges that BVES's needs for information that modeling can provide are different than the needs of the other California wires utilities. For BVES, whose entire service territory is in high fire threat districts, decisions about the prioritization of locations for system hardening can be made primarily on the grounds of equipment age and economic considerations, rather than depending on modeling to determine where risk is highest in order to prioritize system hardening efforts. Risk is high everywhere in the BVES service territory.

In fact, BVES faces a unique risk not faced by the other wires utilities in the state, which is that if a major wildfire were to be ignited within their service territory or to enter their territory from an offsite ignition, there is a real probability that the resulting fire could spread to all or most of their territory. This is a level of consequence – a utility-wide service impact – that heightens the nature of the potential for widespread devastation from a wildfire in BVES's service territory

compared to other utilities. Under this circumstance the entirety of the territory-wide infrastructure rebuild costs would fall to BVES's customer base, as compared to larger utilities where fire rebuild costs affecting a portion of the territory are socialized across the entire customer base.

In our analysis of BVES's modeling efforts in their base 2026-2028 WMP, GPI identified a particular area of deficiency – a lack of adequate consideration of ingress and egress. The BVES service territory is remote, and road access is limited. The Draft Decision notes the lack of adequate consideration of ingress and egress in BVES's base 2026-2028 WMP, and instructs BVES to bring these issues into balance in their first WMP update (2027). GPI supports the inclusion of this instruction in the draft decision.

System Hardening and Fire Safe Operations

Electric utility companies have two major options for replacing bare wire power lines – covered conductors or undergrounding. Undergrounding is significantly more expensive, but underground lines are capable of providing a higher level of wildfire risk reduction. In BVES's case the difference in cost between the two options is exacerbated by the mountainous terrain, both due to the inherent difficulty of working on the ground in mountainous terrain, and the fact that the length of wire needing to be undergrounded in mountainous terrain is much greater than is the case in flat terrain, because the length of line needed in mountainous terrain is minimized by slinging it over valleys, which cannot be done for underground lines. BVES estimates that for their situation, undergrounding their 34 kV bare wire lines would cost ten times as much as rewiring them with covered conductor. BVES concludes that they will focus their grid hardening efforts on installing covered conductor on both the sub-transmission and distribution system, and the draft decision supports this approach. GPI supports this outcome, and supports the OEIS's instruction to the utility to speed up its system hardening efforts.

Encouraging the adoption of EPSS

The bulk of the discussion about grid hardening strategies in the base 2026-2028 BVES WMP is focused on the tradeoffs between covered conductor and undergrounding. We note that complementary to their installation of covered conductor lines, PG&E has also focused increasingly on the use of enhanced powerline safety settings (EPSS) to minimize wildfire

ignition risk along its overhead lines as both an interim and a long-term mitigation approach. EPSS is a complementary component of an overhead mitigation package that enhances risk reduction, reducing the difference between covered conductors and undergrounding. In conjunction with BVES's overhead hardening strategy, it makes abundant sense for BVES to adopt EPSS as fully as possible and as quickly as possible. In our comments on the base 2026-2028 WMP, we suggested that BVES should accelerate its EPSS enablement and related automation capabilities to the maximum extent possible. The OEIS agrees with our position, and orders BVES to speed up their adoption of EPSS, including ordering them to demonstrate in their 2027 update how they have developed an EPSS operational policy and timeline for adoption.

Encouraging the installation of local renewable generation and microgrids

BVES currently has an Application pending before the CPUC for a 5 MW solar generator/battery storage installation that would be able to carry essential load through limited PSPS and other outage events that may occur in the future. Note that a PSPS event in the SCE system in the vicinity of BVES could cause, in effect, a PSPS event in the BVES system, even if weather and other factors do not meet BVES's threshold for declaring a PSPS event. In our comments on the WMP, GPI supported the solar/battery project, which would culminate in a utility owned and operated generating asset. We also noted that the BVES service territory appears to have areas with strong wind resources, and a couple of modern wind turbines strategically located could provide a complementary clean energy source to the solar and battery installation currently under development.

We also encouraged BVES to consider soliciting non-utility renewable distributed energy resource (DER) installations in their service territory, such as rooftop solar or solar-covered parking lots. Such installations would help the utility cope with PSPS and routine outage events, and they would contribute to meeting expanding loads such as vehicle and building electrification with zero-carbon energy sources. Similarly, we encouraged BVES to consider the establishment of microgrids in parts of their territory where there are concentrations of load remote from the main village. The draft decision agrees with these recommendations and orders BVES to begin to pursue them through the course of the 2026-2028 WMP cycle.

Vegetation Management: Management of Operations and Residuals

As we reported in our May 30 comments, BVES has been a leader among the wires utilities in conducting their vegetation management (VM) operations in relative harmony with the community it serves. In addition to cutting and trimming trees along the electric line rights-of-way to code specifications under the supervision of professional foresters, BVES offers various cleanup services to the landowners, who have rights to the wood and residues that are produced in the course of vegetation management operations on their property. BVES specifications for vegetation management operations require that residues are never left on site where they can act as embers for ignitions, or fuel for already ignited wildfires. The proposed decision fails to credit BVES with this aspect of their VM program, and we respectfully request that a notation to that effect be inserted into the OEIS's final decision. GPI has long argued for improved management of the residues produced during utility vegetation management operations, and we believe that exemplary policies should be recognized.

Emergency Preparedness – Plans for post fire restoration

As we reported in our comments on the BVES base 2026-2028 WMP, the document was seriously deficient in its development of plans for post fire restoration. We suggested that BVES should make serious efforts to develop plans for post-fire restoration. The draft decision agrees with our assessment, and orders BVES to include post-fire restoration plans in their next (2029-2031) base WMP. We support this order, and suggest that its implementation begin during the current WMP cycle, rather than waiting for three years.

Conclusions

BVES is the smallest of California's wires utilities, and its entire service territory is in high fire threat terrain. BVES has never experienced a wildfire or even a PSPS event, but their risk level remains high. BVES submitted a strong base 2026-2028 WMP, and OEIS properly is issuing a decision proposing to adopt it. The proposed decision contains a number of suggestions and orders for filling in some of the deficiencies and weaknesses of BVES's submission, and GPI supports both the adoption and improvement of BVES's 2026-2028 base WMP as proposed by the OEIS.

For the reasons stated above, we urge the OEIS to adopt our recommendations herein.

Dated August 5, 2025.

Respectfully Submitted,

A handwritten signature in blue ink, reading "Gregory Morris", is positioned above a horizontal line.

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