State of California – A Natural Resources Agency
Gavin Newsom, Governor

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 15th Floor | Sacramento, CA 95814
916.902.6000 | *www.energysafety.ca.gov*
Caroline Thomas Jacobs, Director

February 13, 2026

To: Bear Valley Electric Service, Inc.
Paul Marconi
President, Treasurer & Secretary
42020 Garstin Dr, PO BOX 1547
Big Bear Lake, CA 92315

SUBJECT: Bear Valley Electric Service Inc's (BVES's) 2024 Vegetation Management Audit (VMA) Report

Pursuant to the requirements of California Public Utilities Code section 8386.3(b)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) has completed its audit of BVES's 2024 Vegetation Management activities included in the 2023-2025 Wildfire Mitigation Plan (WMP).

As described in the attached audit report, Energy Safety concluded that BVES has successfully achieved the objectives of its vegetation management program. While Energy Safety has identified some areas for improvement, BVES has committed to corrective actions to address these in future years.

Pursuant to statutory requirements, a copy of this report is issued to BVES, published on Energy Safety's 2024 VM Audits Docket and provided to the California Public Utilities Commission (CPUC).

Sincerely,

Sheryl Bilbrey
Program Manager, Environmental Science Division
Office of Energy Infrastructure Safety

Cc:
Eric Wu, CPUC
Karen McLaughlin, Energy Safety
Alec Latuszek, Energy Safety
Jared Hennen, BVES
Tom Chou, BVES

Attachment: BVES 2024 VMA Report

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

2024 VEGETATION MANAGEMENT AUDIT REPORT

BEAR VALLEY ELECTRIC SERVICE, INC.

February 13, 2026

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EXECUTIVE SUMMARY

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period.

The Bear Valley Electric Service Inc. (BVES) 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas. Energy Safety provided its Vegetation Management Audit (VMA) of BVES's work related to its vegetation management commitments in its Wildfire Mitigation Plan (WMP) on October 24, 2025 (included in Appendix 1).[1]

The VMA identified that BVES did not provide sufficient documentation that all work was complete for seven of the 13 vegetation management initiatives (vegetation management Inspections, pole clearing, clearance, high-risk species, quality assurance and quality control, open work orders, workforce planning). However, BVES provided its Corrective Action Plan (CAP) on December 5, 2025 (included in Appendix 2).[2] The CAP included additional data, clarifications, and corrective actions to address the seven deficient vegetation management initiatives. Therefore, as discussed in the VMA Report, BVES has provided sufficient documentation to demonstrate that all work identified in the 13 vegetation management initiatives from its 2023-2025 WMP were implemented successfully in 2024 or that BVES has provided a CAP that addresses any remaining deficiencies.

[1] Office of Energy Infrastructure Safety, 2024 VMA of BVES (October 24, 2025), (Appendix 1).
[2] Bear Valley Electric Service, 2024 VMA Corrective Action Plan (December 5, 2025), (Appendix 2).

1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period. The VMA includes three phases:

1. **The audit.** The VMA identifies deficiencies in the electrical corporation's implementation of the vegetation management commitments in its WMP. [3] Energy Safety provided the 2024 VMA to BVES on October 24, 2025,[4] via electronic mail. The VMA is included in Appendix 1.

2. **The CAP.** Energy Safety then provides the electrical corporation time to respond to and develop corrective actions for any deficiency specified in the VMA and provide this response in its CAP. The electrical corporation may provide supplemental data, additional supporting documentation, clarifying statements, and corrective actions for consideration by Energy Safety for use in its final determination of the electrical corporation's performance relative to its WMP vegetation management commitments. BVES provided its CAP to Energy Safety on December 5, 2025.[5] . BVES' CAP is included in Appendix 2.

3. **The audit report.** Energy Safety then reviews the CAP and issues a VMA Report to the electrical corporation identifying any outstanding deficiency in the electrical corporation's implementation of its vegetation management commitments in the WMP. The VMA Report is publicly available on Energy Safety's E-Filing System on the 2024 VM Audits Docket. The VMA and CAP (items 1 and 2 above) are included as appendices within the VMA Report. This VMA Report concludes the VMA process for the 2024 performance year.

The VMA Report is organized as follows:

- Section 2 includes a summary of the deficiencies identified during the VMA, BVES's CAP, and Energy Safety's determination of outstanding deficiencies in BVES's implementation of or planned corrective actions for the 2024 WMP vegetation management commitments.

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[3] Pub. Util. Code, § 8386.3(b)(5)(A).
[4] Office of Energy Infrastructure Safety, 2024 VMA of BVES (October 24, 2025), (Appendix 1).
[5] Bear Valley Electric Service, 2024 VMA CAP (December 5, 2025), (Appendix 2).

- Section 3 includes a discussion of BVES's vegetation management program maturity and programmatic performance relative to the achievement of the objectives of WMP in 2024.

- Section 4 is Energy Safety's conclusion regarding BVES's completion of all work associated with its WMP commitments and program performance for 2024.

2. BVES'S 2024 VMA FINDINGS

BVES's 2023-2025 WMP identifies the objectives, preventative strategies, and programs that BVES has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. Energy Safety analyzed each of the 13 vegetation management initiatives listed in Section 8.2 (Vegetation Management and Inspections) of BVES's 2023-2025 WMP[6] as part of the initial VMA. Each initiative includes one or more commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements within each initiative and determined whether BVES had completed all work associated with each commitment in performance year 2024. Energy Safety's determination of whether all work was complete was based on data and documentation submitted by BVES.

Energy Safety determined that an initiative was "complete" if BVES provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, Energy Safety determined that the initiative was "deficient."

Energy Safety's VMA found that BVES provided data and documentation to support completion of work for six of the 13 initiatives and did not provide information and documentation to support completion of work for seven initiatives. Of the seven initiatives identified in the VMA, BVES's CAP either provided additional documentation to demonstrate that it completed the work or that BVES has committed to corrective actions that will address the deficient initiatives.

[6] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 183 URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

2.1 WMP VM commitment assessment approach

The purpose of the VMA is to determine whether BVES performed all work related to commitments made in its WMP and identify any deficiencies in BVES's vegetation management programs that have the potential to increase wildfire ignition risk.

The VMA includes the following steps:

1. **Completion of Work-** Determination of whether the electrical corporation submitted sufficient documentation to demonstrate that it performed all work for each of the vegetation management commitments described in the WMP.

   If the electrical corporation provided sufficient documentation demonstrating that all work was completed for all commitments within an initiative, Energy Safety concluded that the initiative is complete, and the analysis ended here. If the electrical corporation did not provide sufficient documentation to conclude that all work was complete, then Energy Safety continued the analysis to include one or more of the following:

2. **Assessment of Constraints-** Energy Safety reviewed the documentation provided regarding constraints to determine acceptability and commitment to resolving constraints in a timely way.

3. **Corrective Actions**- Energy Safety reviewed the corrective actions proposed by the electrical corporation to determine if the proposed corrections will prevent future deficiencies and ensure that WMP commitments will be completed in future performance years.

4. **Achievement of Objective**- Determination of whether the electrical corporation's incomplete work has detracted from its ability to achieve the objective of the initiative after considering constraints and planned corrective actions.

2.2 Analysis of work commitments associated with 2024 VM Initiatives

BVES's 2024 VMA findings identified seven initiatives for which it initially did not provide sufficient documentation to support that all work was completed. In its CAP, BVES either provided additional documentation to support completion of its WMP commitments or provided corrective actions to ensure that the commitments would be achieved in future performance years. A summary of Energy Safety's VMA findings regarding the VM initiatives and VMA Report determinations are presented in Table 1. A finding of "Complete" for the VMA Report indicates that BVES provided additional documentation in its CAP to support that all work was completed. A finding of "Achieved objective" indicates that, while Energy Safety

identified some deficiencies, the majority of the work was completed and the CAP provided corrective actions that will address any remaining deficiencies. Energy Safety's analysis which resulted in these conclusions is described for each initiative below.

Table 1. Summary of Energy Safety's findings regarding completion of BVES's VM Initiatives in its 2023-2025 WMP for performance year 2024. Initiatives in bold were found deficient in VMA.

Vegetation Management Initiative	VMA Finding	VMA Report Finding
8.2.2. Vegetation Management Inspections	**Deficient**	**Complete**
8.2.3.1 Pole Clearing	**Deficient**	**Achieved objective**
8.2.3.2 Wood and Slash Management	Complete	Complete
8.2.3.3 Clearance	**Deficient**	**Complete**
8.2.3.4 Fall-In Mitigation	Complete	Complete
8.2.3.5 Substation Defensible Space	Complete	Complete
8.2.3.6 High-Risk Species	**Deficient**	**Complete**
8.2.3.7 Fire Resilient Right-of-Ways	Complete	Complete
8.2.3.8 Emergency Response of Vegetation Management	Complete	Complete
8.2.4 Vegetation Management Enterprise System	Complete	Complete
8.2.5. Quality Assurance and Quality Control	**Deficient**	**Complete**
8.2.6 Open Work Orders	**Deficient**	**Achieved objective**
8.2.7 Workforce Planning	**Deficient**	**Achieved objective**

VMA Finding 1-8.2.2 Vegetation Management Inspections

The purpose of this initiative was to describe the "Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment."[7]

Summary of Initiative Work Commitments and Identified Deficiencies

Energy Safety assessed performance relative to its WMP commitments for six inspection programs: Detailed, Patrol, UAV/HD, LiDAR and substation inspections. Energy Safety found that BVES did not provide sufficient documentation to support that all work commitments pertaining to its UAV/HD inspections commitment were completed in 2024.

In its 2023–2025 WMP, BVES committed to inspecting its entire overhead system (205 circuit miles) [8] using unmanned aerial vehicle (UAV) High Definition (HD) photography and videography. [9] BVES provided documentation showing that UAV inspections were conducted at each primary pole location in its service territory. However, the documentation did not indicate that the conductors spanning between these primary pole locations were also inspected.[10] Energy Safety concluded that BVES did not complete its 205 circuit mile inspection target because the documentation only supported inspections around primary pole locations rather than the full length of conductors.

Additionally, Energy Safety identified potential areas of improvement in BVES's record keeping of its annual 3rd Party Ground Patrol inspections. Energy Safety requested BVES to meet with Energy Safety to discuss possible record keeping improvements and provide a CAP response that outlines any corrective actions that were identified in the meeting.

BVES's CAP Response

Regarding its UAV inspection program, BVES stated in its CAP that:

> *As part of this UAV inspection, photos are taken at each pole, looking down the line. Each location and photo set provide visibility of the conductors between the poles. However, there are inherent limitations when inspectors review these images. Depth perception in*

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[7] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

[8] BVES informed Energy Safety in its 2025 WMP Update that the targeted mileage was updated from 211 circuit miles to 205 due to updates made to BVES's GIS layers after the approval of its 2023-2025 WMP.

[9] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 199, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

[10] Office of Energy Infrastructure Safety, 2024 VMA of BVES Utilities (October 24, 2025), (Appendix 1), p. A-14.

> *photographs can make it challenging to determine the exact position of vegetation in relation to the conductors.*
>
> *BVES has explored alternatives to reduce these limitations, including capturing mid-span photos and videos of the entire line, but these methods did not provide any additional benefit for inspectors. BVES does not believe additional changes to the UAV inspection are needed because BVES considers this inspection to be complimentary to other inspections regularly performed. BVES conducts multiple regular inspections including LiDAR inspection, two ground patrols, satellite imagery, and detailed inspections. These combined methods performed each year ensure wide-ranging visibility and assessment of the system.*[11]

Regarding its 3rd Party Ground Patrol inspection program, BVES stated in its CAP that:

> *During a recent meeting between BVES and OEIS's Energy Safety, BVES proposed a solution to improve the record keeping process for the inspection. In 2026, BVES will add span-lengths information to the inspection database where inspectors document their findings. This additional data will confirm that inspections are completed from pole to conductor to pole, addressing Energy Safety's concerns with the 3rd Party Ground Patrol recordkeeping.*[12]

Analysis of BVES's Performance with the Vegetation Management 2023-2025 WMP Initiatives

BVES's UAV inspection program is limited in its capacity to identify vegetation related hazards along conductors that span between its overhead electric system. Consequently, some vegetation related hazards to BVES's system may not have been identified by its UAV inspection program in 2024. However, BVES implemented four other vegetation inspection programs in 2024, each of which was capable of identifying vegetation hazards on conductors spanning between primary pole locations.[13]

Regarding BVES's record keeping of its 3rd Party Ground Patrol inspection program, Energy Safety concluded that collecting span-length information in BVES's system of record as proposed in BVES's CAP will improve BVES's ability to document and verify the number of circuit miles inspected annually through its 3rd Party Ground Patrol inspection program.

Because BVES's vegetation management inspection program incorporated multiple overlapping inspection methods, including ground-based inspections and LiDAR, Energy Safety concluded that the limitations of the UAV program likely did not increase ignition risk to BVES's system in 2024. Energy Safety also concluded that BVES completed the work under

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[11] Bear Valley Electric Service, 2024 VMA CAP (December 5, 2025), (Appendix 2), p. A-2.
[12] Bear Valley Electric Service, 2024 VMA CAP (December 5, 2025), (Appendix 2), p. A-2.
[13] Office of Energy Infrastructure Safety, 2024 VMA of BVES (October 24, 2025), (Appendix 1), pp. A-11 to A-17.

its UAV inspection commitment, given the inherent limitations of the technology. Further, improvements to record-keeping demonstrate BVES's continual efforts to improve its inspection programs overall.

Initiative Level Determination

The objective of this initiative was to inspect vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.[14] BVES's implementation of multiple inspection programs in 2024 demonstrated that BVES's vegetation inspection program had built in redundancy and utilized multiple techniques to identify vegetation related hazards and reduce the likelihood of ignition from contact with vegetation in 2024. Energy Safety concluded that BVES provided sufficient documentation to indicate that it achieved the objective of Initiative 8.2.2 Vegetation Management Inspections in 2024.

VMA Finding 2-8.2.3.1 Pole Clearing

The purpose of this initiative was to describe the "Plan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area)."[15]

Summary of Initiative Work Commitments and Identified Deficiencies

BVES did not provide sufficient documentation to support that all work commitments pertaining to its 8.2.3.1 Pole Clearing Initiative were completed in 2024.

In its 2023–2025 WMP, BVES stated that "[f]or poles or structures that have non-exempt equipment per CALFIRE requirements, all flammable material and vegetation in a 10-foot radius around the base of the pole or structure shall be cut down and removed during each normal vegetation management cycle clearance visit" and "BVES also clears around exempt poles, where possible."[16]

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[14] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[15] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[16] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 203, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

BVES provided some documentation to demonstrate that it initiated a pole clearing program in 2024 but it did not demonstrate that the work was completed in 2024.[17] BVES also stated that it did not know the locations of all poles with PRC 4292 non-exempt equipment within its service territory, and stated that it only completed pole clearing work on poles that were exempt from PRC 4292 requirements in 2024.[18]

BVES's CAP Response

In its CAP, BVES stated that:

> *BVES has developed a plan to comply with PRC 4292 that will go in effect in 2026. Under this plan, all poles located in the State Responsibility [sic] Area that have not been replaced since 2016 [are] to receive annual pole-brushing work until all equipment on the pole[s] ha[ve] been replaced. This approach ensures that BVES is in compliance with PRC 4292. BVES will document all pole-brushing activities within the BVES enterprise system, Intelligent Vegetation Management System ("IVMS").*[19]

Analysis of BVES's Performance with the Vegetation Management 2023-2025 WMP Initiatives

In its CAP, BVES provided a plan to ensure pole clearing for wildfire mitigation is executed and documented. BVES has acknowledged that it does not know which poles in its service territory have non-exempt equipment and the plan presented in the CAP will treat all poles that have not been replaced since 2016 as though they have non-exempt equipment. BVES stated that it will focus on poles that have not been replaced since 2016 because "that was the year BVES began projects to change out old poles and old equipment with exempt equipment."[20] BVES's proposed plan will ensure that vegetative material at the base of these poles is cleared during normal vegetation management cycles as described in BVES's 2023-2025 WMP.

Energy Safety expects BVES to maintain documentation of the pole clearing activities described in this plan using its IVM system as stated in its CAP so that BVES can demonstrate its implementation of the plan in future performance years. Energy Safety concluded that BVES's CAP addressed the deficiency identified in Initiative 8.2.3.1 Pole Clearing.

Initiative Level Determination

BVES has provided corrective actions to brush all poles in SRA for which the exemption status of equipment is unknown. Therefore, BVES has achieved the objective of Initiative 8.2.3.1 Pole

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[17] Office of Energy Infrastructure Safety, 2024 VMA of BVES Utilities (October 24, 2025), (Appendix 1), p. A-19.
[18] Office of Energy Infrastructure Safety, 2024 VMA of BVES Utilities (October 24, 2025), (Appendix 1), p. A-19.
[19] Bear Valley Electric Service, 2024 VMA CAP (December 5, 2025), (Appendix 2), pp. A-2 to A-3.
[20] BVES Initiative Status Update ESD 12-15-25.

Clearing by performing and documenting annual pole clearing work in accordance with its 2023-2025 WMP commitments. With the implementation of the procedures outlined in its CAP, Energy Safety concluded that BVES has addressed the deficiency identified in the VMA.

VMA Finding 3-8.2.3.2 Vegetation and Fuels Management- Wood and Slash Management

BVES provided sufficient documentation to support that all work commitments pertaining to its 8.2.3.2 Wood and Slash Management Initiative were completed in 2024. As part of the information provided during the 2024 VMA, BVES indicated that it has moved to a new enterprise system which will enable BVES to more accurately track completion of wood and slash management work.

Energy Safety required BVES to include a discussion in its CAP describing the progress made since the 2024 performance year in implementing the stated features of its new enterprise system to track the completion of wood and slash management activities.

In response, BVES stated in its CAP that it "has agreed that wood and slash management data will be documented in BVES's enterprise system, IVMS [Intelligent Vegetation Management System]. As of July 2025, all vegetation management work orders require crews to document the actions completed related to wood and slash management." [21]

Energy Safety concluded that BVES's use of the IVMS enterprise system will further enhance its ability to verify that all wood and slash generated by vegetation management activities is handled in a manner that reduces ignition risk and wildfire spread.

VMA Finding 4-8.2.3.3 Clearance

The purpose of this initiative was to take actions "after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming." [22]

Summary of Initiative Work Commitments and Identified Deficiencies

BVES was unable to provide sufficient documentation to support that all work commitments pertaining to its 8.2.3.3 Clearance Initiative were completed in 2024.

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[21] Bear Valley Electric Service, 2024 VMA CAP (December 5, 2025), (Appendix 2), p. A-3.
[22] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

In its 2023-2025 WMP, BVES committed to performing vegetation clearance work along 72 circuit miles in 2024. During Energy Safety's 2024 VMA, BVES provided records of completed vegetation clearance work orders and areas of its service territory that received clearing work in 2024.[23] While the information provided by BVES indicated that vegetation clearance work was conducted throughout BVES's service territory in 2024, it did not demonstrate how BVES determined that 100 circuit miles were cleared. The documentation did not explain the methodology used to calculate the number of circuit miles cleared based on individual tree work. Without a link between the individual clearance activities and the circuit miles cleared, Energy Safety concluded that BVES did not complete all work for this commitment.

BVES's CAP Response

In its CAP, BVES explained how it calculated the circuit mileage that was completed for its clearance target (VM_9) in 2024, stating that:

> *Each quarter, BVES calculates the circuit miles cleared for VM_9 after […] all of the primary lines within the grid have been inspected and vegetation crews have completed all clearance work on the lines. Subsequently, BVES selects all of the grids that were completed and creates a geodatabase that totals up all of the circuit miles completed.*
>
> *The total circuit miles determined from the grid count are used in BVES's Quarterly Data Reports ("QDR") for VM_9, and as part of the QDR spatial data to Energy Safety.*[24]

Analysis of BVES's Performance with the Vegetation Management 2023-2025 WMP Initiatives

BVES divided its service territory into square grids, each assigned a unique identification number. BVES provided documentation identifying the specific grids where vegetation management work was completed in 2024, including the unique grid ID and the corresponding circuit miles contained within each grid. In addition to this documentation, Energy Safety also reviewed BVES's 2024 spatial Quarterly Data Report (QDR) submissions, which included a map of BVES's service territory identifying the grids completed under the Clearance target (VM_9), as well as the locations of individual trees trimmed within those grids.

In its CAP, BVES described the methodology used to calculate completed circuit mileage. Specifically, BVES stated that circuit miles were counted toward the target only after all primary lines within a grid have been inspected and all required vegetation clearance work has been completed. Once a grid met these criteria, BVES designated the grid as complete and used a geodatabase to sum the circuit miles associated with the completed grids.

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[23] Office of Energy Infrastructure Safety, 2024 VMA (October 24, 2025) (Appendix 1), p. A-23.
[24] Bear Valley Electric Service, 2024 VMA CAP (December 5, 2025), (Appendix 2), p. A-3.

Using this methodology, BVES calculated that it inspected 100 circuit miles of its system in 2024 and performed vegetation clearance where needed along those inspected miles. BVES's approach reflects an inspection driven clearance program consistent with the objective of Initiative 8.2.3.3. Accordingly, Energy Safety concluded that BVES exceeded its 2024 target of 72 circuit miles and that no deficiency existed in BVES's execution of this target that would have increased ignition risk in 2024.

Initiative Level Determination

The objective of this initiative was to take actions after inspections to ensure that vegetation does not encroach upon electrical equipment and facilities. BVES provided information indicating that it performed slope, top, or side trimming on 6,251 trees in 2024 to maintain required clearances from its electrical infrastructure. BVES also provided documentation that it exceeded its clearance target (VM_9) by inspecting 100 circuit miles of its overhead electric system and performing vegetation clearance work along those circuit miles as needed. The information provided by BVES indicated that it met the objective of Initiative 8.2.3.3 Clearance.

VMA Finding 5-8.2.3.6 High-Risk Species

The purpose of this initiative was to take actions "to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation."[25]

Summary of Initiative Work Commitments and Identified Deficiencies

BVES provided documentation to support that all work commitments pertaining to its 8.2.3.6 High-Risk Species Initiative were completed in 2024. However, in a Vegetation Management Program Annual Audit that was performed by BVES's contract forester in 2024, the forester indicated that BVES could further reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation by taking a more aggressive approach in removing problematic vegetation. Similar recommendations were made during the 2023 Audit and were not addressed.[26] Therefore, Energy Safety concluded that initiative 8.2.3.6 High-Risk Species was deficient.

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[25] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

[26] Office of Energy Infrastructure Safety, 2024 VMA of Bear Valley Electric Service (August 28, 2025), (Appendix 1), p. A-28.

BVES's CAP Response

In its CAP, BVES stated that:

> *BVES has made significant efforts to remove high-risk species throughout the service territory. For example, BVES removed more than double the initiative target for the year in 2024 and is currently dedicating 30% of all vegetation management resources to removing high-risk species and dead and dying trees. BVES has seen numerous improvements in the condition of vegetation surrounding the electrical system as reflected in its reliability metrics and will continue to dedicate resources to removing problematic vegetation – mostly high-risk species and dead, and dying trees – as feasible, without allowing other removal activities and other initiatives to fall behind.*[27]

Analysis of BVES's Performance with the Vegetation Management 2023-2025 WMP Initiatives

Because BVES completed the work commitments under its 8.2.3.6 High-Risk Species Initiative as described in its 2023-2025 WMP and responded to the recommendations made by its forester in its CAP, Energy Safety concluded that BVES has completed all work under this initiative. However, BVES's forester identified problematic vegetation such as fast-growing species and dead, and dying trees posed a risk to BVES's system in both 2023 and 2024 in the Vegetation Management Program Annual Audit. Energy Safety encourages BVES to continue evaluating the performance of its vegetation management program to identify and implement system improvements that effectively mitigate ignition risk posed by high-risk vegetation species by efficiently utilizing BVES's available resources.

Initiative Level Determination

In its CAP, BVES provided clarification on how it reviewed and responded to its Vegetation management Program Annual Audit. Energy Safety concluded that BVES met the objective of Initiative 8.2.3.6 High-Risk Species by reducing the ignition probability and wildfire consequence attributable to high-risk species of vegetation in 2024.

VMA Finding 6-8.2.5 Quality Assurance and Quality Control

The purpose of this initiative was to describe the "Establishment and function of audit process to manage and confirm work completed by employees or contractors, including

[27] Bear Valley Electric Service, 2024 VMA Corrective Action Plan (December 5, 2025), (Appendix 2), pp. A-3 to A-4.

packaging QA/QC information for input to decision-making and related integrated workforce management processes."[28]

Summary of Initiative Work Commitments and Identified Deficiencies

BVES did not provide sufficient documentation to support that all work commitments pertaining to its 8.2.3.5 Quality Assurance and Quality Control Initiative were completed in 2024.

BVES stated in its 2023-2025 WMP that "BVES has a vegetation management plan in place that meets or exceeds the minimum requirements of the CPUC's applicable [General Orders] GOs… The plan will be reviewed and updated on an as needed basis not to exceed three years, depending on changing conditions."[29] Because BVES's vegetation management plan includes procedures relevant to several initiatives, Energy Safety evaluated this statement under the Quality Assurance and Quality Control (QA/QC) Initiative, as it involves reviewing and updating an activity aligned with QA/QC practices.

BVES provided its vegetation management plan titled "Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs Revision 1." BVES stated that the plan was last updated in October 2021, which was consistent with the publication date listed in the document.[30] Furthermore, BVES stated that it began updating the plan in 2025 and intends to publish the revised version by the end of 2025.[31] This timeline is inconsistent with BVES's 2023–2025 WMP, which states that "[t]he plan will be reviewed and updated on an as-needed basis, not to exceed three years."[32] Therefore, Energy safety concluded that Initiative 8.2.5 Quality Assurance and Quality Control was deficient.

BVES's CAP Response

In its CAP, BVES stated that it "is currently revising the document 'Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs'. BVES will provide Energy

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[28] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

[29] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, pp. 203, 204, 207, 208, 209, 210, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

[30] Office of Energy Infrastructure Safety, 2024 VMA of Bear Valley Electric Service (October 24, 2025), (Appendix 1), p. A-38.

[31] Office of Energy Infrastructure Safety, 2024 VMA of Bear Valley Electric Service (October 24, 2025), (Appendix 1), p. A-38.

[32] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, pp. 203, 204, 207, 208, 209, 210, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

Safety the document no later than December 30, 2025."[33] BVES later provided the updated document in an email sent to Energy Safety on January 6, 2026.

Analysis of BVES's Performance with the Vegetation Management 2023-2025 WMP Initiatives

In its 2024 VMA, Energy Safety required BVES to either provide the updated Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs procedural document or a status update on when the revised version would be published as part of its CAP. In response, BVES provided an updated version of the requested document, which was published on January 6, 2025.

Initiative Level Determination

Based on the documentation BVES provided, Energy Safety concluded that BVES implemented a successful QA/QC program in 2024 which supported the objective of Initiative 8.2.5, Quality Assurance and Quality Control. BVES provided information that BVES exceeded its QA/QC sample-size target by completing 131 vegetation quality checks (QCs), compared to its target of 72. Each QC involved inspection of multiple trees; in total, BVES inspected 1,519 trees in 2024. Only two trees were found out of compliance with BVES's standards, demonstrating that BVES achieved its QA/QC pass-rate target of 99%. BVES also completed mitigation work on the two non-compliant trees within 18 days of identification.

While BVES did not update its vegetation management QA/QC procedures on schedule, it did revise its procedure document and provided that to Energy Safety. With this update, BVES now has vegetation management and QA/QC procedures that align with its current best management practices for those programs. Therefore, BVES met the overall objective of Initiative 8.2.5, Quality Assurance and Quality Control.

VMA Finding 7-8.2.6 Open Work Orders

The purpose of this initiative was to describe the "Actions taken to manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities."[34]

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[33] Bear Valley Electric Service, 2024 VMA Corrective Action Plan (December 5, 2025), (Appendix 2), p. A-4.
[34] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

Summary of Initiative Work Commitments and Identified Deficiencies

BVES did not to provide sufficient documentation to support that all work commitments pertaining to its 8.2.3.6 Open Work Orders Initiative were completed in 2024.

In its 2023-2025 WMP, BVES included a target to complete all work orders within GO 95 timeframes. BVES also outlined timeframes for completing work orders in its WMP, some of which were more rapid than required by GO 95. Energy Safety assessed BVES's completion of its open work order (VM_17) target based on the timeframes stated in its 2023-2025 WMP. BVES defines the time frames to complete work orders based on priority in the following statement in its 2023-2025 WMP:

> *When a discrepancy is identified by the vegetation inspector, a work order is created and a severity level (Level 1, 2, or 3 in accordance with GO 95 Rule 18) is applied. The severity will dictate the timeframe for remediation. For vegetation related discrepancies timeframe and example situations are as follows:*
>
> - *Level 1 – Immediate Action – Vegetation Order Issued to Contractor for Immediate Action*
>   - *Vegetation contacting, nearly contacting or arcing to high voltage conductor, vegetation contacting low voltage conductor and compromising structure, etc.*
> - *Level 2 – Action within 30 days – Vegetation Order Issued to Contractor for action within 30 days*
>   - *Vegetation within 48 inches of high voltage lines, vegetation causing strain or abrasion on low voltage conductor, tree or portions of tree that are dead, rotten, or diseased that may fall into power lines, etc.*
> - *Level 3 – Non-urgent Normal Cycle Action – Vegetation Order issued to Contractor for action during the next normal vegetation cycle.*[35]

BVES provided information which indicated that all vegetation management work orders created in 2024 were completed within the timeframes required, based on the priority level and the time elapsed between the work order assignment and completion.[36] However, while BVES's records indicated that all work orders were resolved within required time frames, this was misleading because BVES started the time frame following field verification rather than when the discrepancy was first identified. Energy Safety understood these timeframes to begin when BVES was first made aware of a discrepancy (during inspection) and end when

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[35] Bear Valley Electric Service Inc., 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 216, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[36] Office of Energy Infrastructure Safety, 2024 VMA of Bear Valley Electric Service (October 24, 2025), (Appendix 1), p. A-40.

appropriate actions to correct a discrepancy were completed. Instead, BVES started the time frame when the work order was assigned.

Energy Safety identified significant delays between the time vegetation hazards were identified during LiDAR inspections and when those hazards were remediated. BVES stated that its contractor provided LiDAR data to BVES which identified vegetation hazards on August 8, 2024.[37] However, it took BVES between 11 and 13 days to field-verify Level 1 priority hazards and create the work orders. While the work orders were then completed within 1 day, these hazards were present in BVES's system for an average of 12 days between receipt of LiDAR data and work order assignment. For Level 2 priority hazards, BVES took between 11 and 116 days (an average of 73 days) to field verify and assign a work order for remediation.[38] The delayed response times for Level 1 and Level 2 hazards indicate that BVES was aware of significant hazards to its system but did not mitigate those hazards within committed timeframes. Energy Safety concluded that this work commitment was deficient.

BVES's CAP Response

In its CAP, BVES stated that it "has made substantial progress in addressing open work orders from inspection programs… In 2025, BVES was able to inspect and correct all findings in under 39 days from the date that BVES received the data. BVES aims to continue to improve this timeframe in the future by addressing all findings in under 30 days from the receipt of the data."[39]

BVES also stated that the corrective actions included in its response to Energy Safety's 2023 Substantial Vegetation Management Audit finding are no longer viable due to updates in LiDAR processing technology. BVES has indicated that it receives its processed LiDAR data all at once and lacks the capacity to quickly field-verify the findings and mitigate vegetation hazards from the time of receipt of LiDAR data. In light of these challenges, BVES committed to updating its procedural document "to create realistic timeframes for addressing open work orders from inspection programs that generate large volumes of data at one time"[40] in its CAP.

BVES stated that it plans to revise the procedures as follows: "A level 1 possible finding will have 14 days to be inspected and once the finding is confirmed, BVES will have 24 hours to correct the encroachment. A level 2 possible finding will have 30 days to be inspected and once a finding is confirmed, BVES will have 30 days to correct the encroachment. With these

[37] Office of Energy Infrastructure Safety, 2024 VMA of Bear Valley Electric Service (October 24, 2025), (Appendix 1), p. A-40.
[38] Office of Energy Infrastructure Safety, 2024 VMA of Bear Valley Electric Service (October 24, 2025), (Appendix 1), p. A-40.
[39] Bear Valley Electric Service, 2024 VMA Corrective Action Plan (December 5, 2025), (Appendix 2), p. A-5.
[40] Bear Valley Electric Service, 2024 VMA Corrective Action Plan (December 5, 2025), (Appendix 2), p. A-5.

revised timeframes, BVES will be able to stay compliant after receiving large data sets of possible encroachments."[41]

In a follow-up email submitted to Energy Safety after BVES's CAP submission, BVES provided Revision Two of its "Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs" procedural document, which was published on January 6, 2026. This procedural document included the updated procedures referenced in BVES's CAP.

Analysis of BVES's Performance with the Vegetation Management 2023-2025 WMP Initiatives

Energy Safety assessed BVES's completion of its open work order target using a timeframe that began when BVES was first made aware of a discrepancy during an inspection and ended when corrective actions were completed. Using this approach, Energy Safety determined that some Priority 1 work orders were not completed immediately upon identification and that some Priority 2 work orders were not completed within 30 days, as committed to in BVES's 2023–2025 WMP. These findings were based on delays between the receipt of LiDAR inspection data identifying potential vegetation hazards and the completion of field verification to confirm the potential hazards.

Upon further review of BVES's 2023–2025 WMP, Energy Safety determined that while the WMP established risk-based timeframes for completing vegetation management work orders, it did not define when those timeframes were intended to begin. Specifically, the WMP did not clarify whether the timeframes started when discrepancies were first reported to BVES by its inspection contractors, when discrepancies were field verified by BVES, or when a work order was generated following field verification.

In its CAP, BVES stated that the work orders identified by Energy Safety as delayed were associated with potential vegetation encroachments identified through its LiDAR inspection program, which delivers inspection findings for BVES's entire service territory in a single data set. In 2024, this LiDAR inspection program identified 190 potential vegetation encroachment issues. BVES indicated that the volume of data generated by this inspection program created logistical challenges that limited its ability to field verify and mitigate all identified hazards within the timeframes outlined in its 2023–2025 WMP.

Energy Safety determined that BVES's delayed response to LiDAR identified hazards reflected a procedural gap. Specifically, BVES did not have procedures establishing timeframes for field verification and remediation of inspection findings generated by inspection programs that deliver large volumes of data at one time. As a result, some vegetation hazards remained unaddressed for extended periods following identification.

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[41] Bear Valley Electric Service, 2024 VMA Corrective Action Plan (December 5, 2025), (Appendix 2), p. A-5.

To address this deficiency, BVES committed in its CAP to updating its vegetation management procedures to establish defined and realistic timeframes for responding to inspection findings from inspection programs that generate large volumes of data at one time. BVES subsequently revised its "Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs" procedural document, which was published on January 6, 2026. The revised procedures establish clear expectations for the timing of field verification and remediation activities based on priority level and available resources.

Energy Safety concluded that these procedural updates establish a clear and consistent process for addressing vegetation related risks identified through LiDAR inspections and other inspection programs that deliver large volumes of data to BVES at one time. The updates emphasize timely mitigation of ignition risks while accounting for BVES's available resources and address the procedural deficiency which existed in BVES's 2024 procedures.

Initiative Level Determination

Energy Safety determined that BVES completed all work orders generated by its Detailed, Patrol, UAV, LiDAR, and 3rd Party Ground Patrol inspection programs within the timeframes established in its 2023–2025 WMP. Further, BVES updated its procedure to incorporate clear and realistic timeframes related to mitigation of vegetation hazards identified in its LiDAR inspection program. Therefore, Energy Safety concluded that BVES achieved the objective of Initiative 8.2.6, Open Work Orders to take actions to manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities.

VMA Finding 8-8.2.7 Workforce Planning

The purpose of this initiative was to describe "Programs to ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work."[42]

Summary of Initiative Work Commitments and Identified Deficiencies

BVES did not provide sufficient documentation to support that all work commitments pertaining to its 8.2.7 Workforce Planning Initiative were completed in 2024.

Table 8-20 "Vegetation Management Qualifications and Training" included in BVES's 2023-2025 WMP set a "special certification requirement" for all of BVES's contracted Tree Trim

[42] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-26, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

General Foreman/Supervisors, and Tree Trimmer positions to be ISA certified and have completed Line-Clearance Qualified Tree-Trimmer training."[43]

BVES provided information which indicated that all contracted tree crew staff received training related to tree trimming line clearance work, but that none of the contracted Tree Trim General Foreman/Supervisors nor Tree Trimmers held ISA certifications in 2024.[44]

BVES's CAP Response

In its CAP, BVES stated that:

> *BVES revised the qualification for the positions of contracted Tree Trim General Foreman/Supervisor and Tree Trimmer positions for the 2026-2028 WMP. See table below of updated qualifications. BVES determined that it is not necessary for these positions to hold the certification of ISA certified forester. BVES does have a contracted ISA certified forester that assists vegetation crews when needed.*[45]

Worker Title	Minimum Qualifications for Target Role	Applicable Certifications
Tree Trim General Foreman/Supervisor (Contractor)	5 years of line clearance tree pruning experience in a Foreman role Line clearance Certification Current California Driver License General Computer knowledge	Line-clearance qualified tree- trimmer
Tree Trim Groundman	One year of arboriculture experience or degree in relevant field	Strong work ethic Current California Driver License (Class B permit) General computer skills

Analysis of BVES's Performance with the Vegetation Management 2023-2025 WMP Initiatives

In response to Energy Safety's 2024 VMA request, BVES submitted revised qualification requirements for its contracted Tree Trim General Foreman/Supervisor and Tree Trimmer

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[43] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, pp. 225-226, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

[44] Office of Energy Infrastructure Safety, 2024 VMA of Bear Valley Electric Service (October 24, 2025), (Appendix 1), p. A- 43.

[45] Bear Valley Electric Service, 2024 VMA Corrective Action Plan (December 5, 2025), (Appendix 2), p. A-6.

positions and stated that, since its last WMP submission, it has determined that ISA certification for these positions is unnecessary. These revised qualifications have been included in BVES's 2026-2028 WMP which was approved by Energy Safety on November 4, 2025.[46] Given that the revised qualifications require less certification, Energy Safety expects BVES to continue providing sufficient training to its vegetation management staff to ensure work is performed effectively and safely. Energy Safety also expects BVES to continue utilizing its ISA certified contract forester, whose credentials were verified during the 2024 VMA, to assist crews as needed, consistent with BVES's CAP commitment.

Initiative Level Determination

Although BVES's contracted Tree Trim General Foreman/Supervisor and Tree Trimmer positions did not hold ISA certifications in 2024, BVES demonstrated that personnel in these roles completed training relevant to performing vegetation management work safely and effectively. BVES also met its workforce planning target and showed that its field inspector received training related to inspecting vegetation near power lines. Accordingly, despite the absence of ISA certification among contracted tree trimmer positions in 2024, BVES met the objective of Initiative 8.2.7, Workforce Planning, by providing training to ensure its contractors were qualified to perform vegetation management work.

3. BVES'S 2024 VM PROGRAMMATIC PERFORMANCE ASSESSMENT

3.1 Performance Assessment of BVES's VM Program

The programmatic assessment is an evaluation of BVES's VM program maturity. Energy Safety considers BVES's year-over-year progress in achieving VM objectives, and whether BVES has implemented the corrective actions as described in CAP responses from previous performance periods. Energy Safety also evaluates the totality of the vegetation management work and initiative level analysis conclusions to determine whether BVES completed sufficient work in all initiatives within its vegetation management program to meet the stated objectives of the WMP and minimize the risk of catastrophic wildfire posed by electrical lines and equipment.

[46] Office of Energy Infrastructure Safety, Decision for the Bear Valley Electric Service, Inc. 2026-2028 Base Wildfire Mitigation Plan, Published November 4, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59577&shareable=true).

3.2 2024 VM Programmatic Level Performance Analysis

Energy Safety's VMA, dated October 24, 2025, found that BVES completed all work in six of the 13 initiatives in its 2023-2025 WMP and was deficient in seven. BVES's CAP, dated December 5, 2025, supplied additional clarifying information regarding the seven deficient initiatives that addressed the deficiencies identified in the VMA and supplied corrective actions to improve performance in future years.

BVES has demonstrated a commitment to improving its vegetation management around its poles in response to VMA findings. As discussed above, Energy Safety identified deficiencies in BVES's pole clearing program in 2024. BVES could not provide documentation to indicate that pole clearing work was completed in 2024. Energy Safety identified similar deficiencies in BVES's 2023 pole clearing program.[47] In response to these deficiencies, BVES provided corrective actions in both 2023 and 2024 to mature its pole clearing program. Energy Safety concluded that BVES's proposed corrective actions in its 2024 CAP will improve BVES's pole clearing program and reduce ignition risk on its system. BVES has committed to clearing vegetation from the base of all poles located in the SRA that have not been replaced since 2016, and to treating these poles as having non-exempt equipment unless and until field verification confirms otherwise. It has also committed to continue its practice of replacing non-exempt equipment on its poles to reduce wildfire ignition risk.

BVES has also demonstrated continued internal evaluation of its inspection programs. In 2024, Energy Safety identified deficiencies related to the timely completion of mitigation work associated with findings generated through BVES's LiDAR inspection program. In both 2023 and 2024, significant delays occurred between BVES's receipt of LiDAR inspection findings from its contractor and the completion of mitigation work. BVES provided corrective actions in both years to improve response times for work identified through its LiDAR inspection program. In its 2024 CAP, BVES stated that the corrective actions provided in response to Energy Safety's 2023 Substantial Vegetation Management Audit were no longer viable due to advancements in LiDAR technology. As a result, BVES provided updated corrective actions to reduce delays in responding to LiDAR inspection findings. BVES's 2024 CAP addressed this deficiency by establishing defined timeframes that enable BVES to prioritize and complete work in a manner that emphasizes the timely mitigation of ignition risks, consistent with available resources.

BVES also committed in its 2024 CAP to improving recordkeeping for its 3rd Party Ground Patrol inspection program. Beginning in 2026, BVES stated that it will add span-length information to its inspection database for 3rd Party Ground Patrol inspections. This

[47] Office of Energy Infrastructure Safety, 2023 SVM Audit Report of BVES, Published June 2025, p. 6, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58715&shareable=true).

enhancement will improve BVES's ability to verify that inspections are completed from pole to conductor to pole, addressing Energy Safety's recommendation from the 2024 VMA.

Lastly, BVES has continued to improve its wood and slash management program in response to VMA audit findings. BVES began documenting wood and slash management data in its enterprise system, IVMS, in July 2025. BVES stated that all vegetation management work orders now require crews to document actions taken related to wood and slash management.[48] Energy Safety concluded that BVES's use of the IVMS enterprise system will further enhance its ability to verify that all wood and slash generated by vegetation management activities is managed in a manner that reduces ignition risk and wildfire spread.

Overall, BVES has demonstrated continued improvement in its vegetation management programs through corrective actions to address deficiencies identified in Energy Safety's 2023 and 2024 VMAs. Based on the corrective actions outlined in BVES's CAP, Energy Safety concludes that BVES has provided sufficient documentation to demonstrate that all work identified in the 13 vegetation management initiatives from its 2023-2025 WMP were implemented successfully in 2024 or that BVES has provided a CAP that Energy Safety concludes will address any remaining deficiencies and enable BVES to meet the objectives of the 13 vegetation management initiatives described in its 2023–2025 WMP.

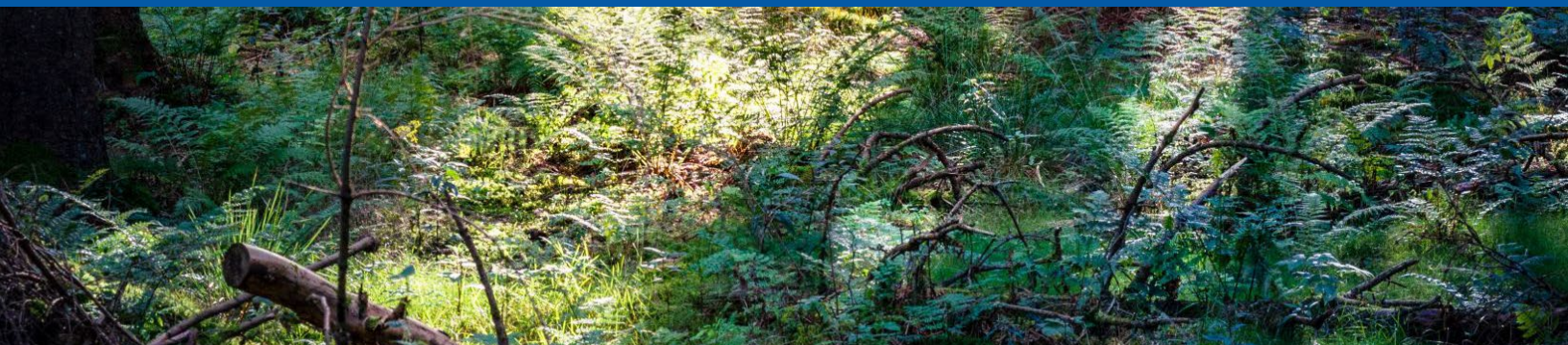
4. CONCLUSION

Based upon the analysis discussed in Sections 2 and 3, Energy Safety concludes that BVES has successfully achieved the objectives of its vegetation management program. While Energy Safety has identified some areas for improvement, BVES has committed to corrective actions to address these deficiencies in future years.

[48] Bear Valley Electric Service, 2024 VMA CAP (December 5, 2025), (Appendix 2), p. A-3.

DATA DRIVEN
FORWARD-THINKING
INNOVATIVE
SAFETY FOCUSED

APPENDIX 1. Bear Valley Electric Service, Inc. 2024 Vegetation Management Audit



APPENDIX DESCRIPTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), Energy Safety may annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The Vegetation Management Audit (VMA) shall identify deficiencies in the electrical corporation's implementation of the vegetation management commitments in its Wildfire Mitigation Plan (WMP).

Energy Safety analyzed each of the thirteen vegetation management initiatives listed in BVES's 2023-2025 WMP for performance year 2024 as part of its annual audit.

For each initiative in Section 8.2 (Vegetation Management and Inspections) of BVES's 2023-2025 Wildfire Mitigation Plan (WMP), Energy Safety identified the quantitative targets and commitments as well as verifiable, narrative statements relevant to each initiative and compared that to the work performed by BVES in 2024.

This appendix reproduces the information sent to BVES on October 24, 2025 and describes Energy Safety's analysis and determination of whether BVES completed all work for each Vegetation Management Initiative.

Energy Safety's analysis includes a summary of the information provided by BVES to substantiate completion of each target or statement, Energy Safety's analysis of that information, and a conclusion regarding completion. Based on the determination of completeness for all targets and statements, Energy Safety provides a finding for each initiative. A finding of "Completed all work" was given only if BVES provided sufficient documentation or supporting information demonstrating completion of all targets and/or statements within that initiative. If any target or statement was incomplete or insufficiently documented, the overall finding for the initiative was "did not complete all work."

For any commitment or statement for which BVES was not able to provide supporting documentation or information to support completion, BVES was asked to address those deficiencies as a part of a corrective action plan (CAP). BVES's CAP is included in Appendix 2.

Bear Valley Electric Service Inc.'s 2024 WMP Vegetation Management Audit

Audit Date: October 24, 2025

Response Due: November 24, 2025

To: Paul Marconi
Paul.Marconi@BVESinc.com
42020 Garstin Dr, PO BOX 1547
Big Bear Lake, CA 92315

From: Sheryl Bilbrey
Sheryl.Bilbrey@energysafety.ca.gov

CC: Karen McLaughlin, Energy Safety
Alec Latuszek, Energy Safety
Eric Wu, CPUC
Jared Hennen, BVES

Subject: Office of Energy Infrastructure Safety's Audit of Bear Valley Electric Service Inc.'s 2024 WMP Vegetation Management Commitments

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Pursuant to Public Utilities Code section 8386.3(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) has completed an audit of the WMP vegetation management initiative commitments in Bear Valley Electric Service (BVES) Inc.'s 2023-2025 Wildfire Mitigation Plan (WMP) for the 2024 performance year.

The audit findings provided in this document are based on Energy Safety's analysis of all relevant data provided to Energy Safety by BVES to substantiate completion of all vegetation management work commitments in qualitative statements and quantitative targets in its WMP during performance year 2024. Instances where the data provided by BVES did not substantiate completion of the work associated with the WMP vegetation management initiative commitments are documented as deficiencies in this audit.

Upon receipt of this audit document, BVES must provide additional data or clarifications to Energy Safety as part of a Corrective Action Plan (CAP), described below. Energy Safety is available to meet with BVES to discuss the audit findings and provide any clarification necessary for BVES to prepare the CAP.

Energy Safety will consider all supplemental information and data included in the CAP as part of our analysis of BVES's performance relative to the 2024 WMP vegetation management initiative commitments. Upon completion of Energy Safety's analysis of the CAP, Energy Safety will publish an Audit Report identifying any outstanding deficiencies in BVES's implementation or planned corrective actions relative to its vegetation management commitments in the BVES 2023-2025 WMP.[49]

[49] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

BVES Corrective Action Plan

The CAP is an opportunity for BVES to provide supplemental data, additional supporting documentation and/or clarifying statements for consideration by Energy Safety as part of our analysis of BVES's implementation or planned corrective actions relative to its vegetation management commitments in the 2023-2025 WMP. To support Energy Safety's performance assessment, the BVES CAP may include any of the following:

- Supplemental data and/or supporting documentation substantiating completion of all work on the vegetation management commitment identified as deficient or incomplete in this audit during the 2024 performance year;

- Detailed documentation of constraint(s) that prevented completion of the work commitment and actions BVES has taken to resolve those constraints; and/or

- Description of corrective actions BVES has implemented or plans to implement to address outstanding deficiencies identified in past or current vegetation management audits.

BVES must email a copy of its response report to Energy Safety within **30 days** of receipt of this document. The list of recipients should include:

- Karen McLaughlin, karen.mclaughlin@energysafety.ca.gov
- Alec Latuszek, alec.latuszek@energysafety.ca.gov
- Environmental Science Division, environmentalscience@energysafety.ca.gov

Audit Process Overview

Energy Safety analyzed each of the thirteen vegetation management initiatives listed in BVES's 2023-2025 WMP[50] as part of this initial audit report. The WMP identifies the electrical corporation's objectives, preventative strategies, and programs that it has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. The vegetation management section of the WMP includes 13 initiatives, each of which includes one or more specific work commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements relevant to each initiative and compared that to the work performed by BVES in performance year 2024. Determination of whether all work was complete for each commitment was based on data and documentation submitted by BVES.

For each initiative in Section 8.2 (Vegetation Management and Inspections) of BVES's 2023-2025 WMP, quantitative targets and commitments as well as verifiable, narrative statements are assessed for completion. BVES provided data and documentation to support completion of work for six of the 13 initiatives and did not provide information and documentation to support completion of work for seven initiatives. A summary of Energy Safety's findings regarding the VM initiatives is presented in Table 1. A summary of all work commitments for each initiative and Energy Safety's determination on completeness is presented in Table 2.

For each WMP commitment, a summary of the supporting information provided by BVES, Energy Safety's analysis of that information, and a conclusion regarding completion are documented. Energy Safety then provides a finding for each initiative. A finding of "complete" was given only if BVES provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, the overall finding for the initiative was "deficient."

Within the findings section of each initiative, Energy Safety has included CAP requirements for initiatives that were deficient, as well as for complete initiatives which contained commitments for which Energy Safety has identified areas for improvement.

[50] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

1. Table 1. Summary of Energy Safety's findings regarding completion of BVES's vegetation management and inspections Initiatives in its 2023-2025 WMP for performance year 2024. Deficient initiatives are bold.

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2 Vegetation Management Inspections	8.2.2 Vegetation Management Inspections	Deficient
8.2.3 Vegetation and Fuels Management	**8.2.3.1 Pole Clearing**	**Deficient**
8.2.3 Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	Complete*
8.2.3 Vegetation and Fuels Management	8.2.3.3 Clearance	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	Complete
8.2.3 Vegetation and Fuels Management	**8.2.3.6 High-Risk Species**	**Deficient**
8.2.3 Vegetation and Fuels Management	8.2.3.7 Fire Resilient Right-of-Ways	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.8 Emergency Response Vegetation Management	Complete
8.2.4 Vegetation Management Enterprise System	8.2.4 Vegetation Management Enterprise System	Complete
8.2.5 Quality Assurance and Quality Control	**8.2.5 Quality Assurance and Quality Control**	**Deficient**
8.2.6 Open Work Orders	**8.2.6 Open Work Orders**	**Deficient**
8.2.7 Workforce Planning	**8.2.7 Workforce Planning**	**Deficient**

* CAP response required

2. Table 2. Summary of Energy Safety's findings regarding completion of BVES's WMP commitments in performance year 2024. Incomplete commitments are bold.

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
8.2.2.1 Detailed Inspection (VM_1)	51 circuit miles	51 circuit miles	Completed all work
8.2.2.2 Patrol Inspection (VM_2)	205 circuit miles*	205 circuit miles	Completed all work
8.2.2.3 UAV HD Photography / Videography (VM_3)	**205 circuit miles***	**6,593 poles[+]**	**Did not complete all work**
8.2.2.4 LiDAR Inspection (VM_4)	205 circuit miles*	205 circuit miles	Completed all work
8.2.2.5 3rd Party Ground Patrol (VM_5)	205 circuit miles*	205 circuit miles	Completed all work
8.2.2.6 Substation Inspection (VM_6)	144 inspections**	156 inspections	Completed all work
8.2.3.1 Pole Clearing	**Pole Clearing in accordance with Public Resources Code section 4292 and beyond**	**Did not achieve**	**Did not complete all work**
8.2.3.2 Wood and Slash Management (VM_8)	Contractor adherence to waste removal procedure	Achieved[++]	Completed all work

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
8.2.3.3 Clearance (VM_9)	72 circuit miles	6,251 clearance activities[+]	Completed all work
8.2.3.4 Fall-in Mitigation (VM_10)	88 trees	182 trees	Completed all work
8.2.3.5 Substation Defensible Space (VM_11)	13 substations	13 substations	Completed all work
8.2.3.6 High-Risk Species (VM_12)	WMP plan review and vegetation discussion with experts	Review complete but recommendations not incorporated[++]	Completed all work
8.2.3.6 High-Risk Species	Mitigation of high-risk species	Achieved	Completed all work
8.2.3.7 Fire Resilient Right-of-Ways (VM_13)	WMP plan review and vegetation discussion with experts	Achieved	Completed all work
8.2.3.7 Fire-Resilient Right-of-Ways	Completion of right-of-way clearance work	Achieved	Completed all work
8.2.3.6 Emergency Response Vegetation Management (VM_14)	Verification of readiness and review of plan	Achieved	Completed all work

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
8.2.3.8 Emergency Response Vegetation Management	Completion of emergency response vegetation management	Achieved	Completed all work
8.2.4 Vegetation Management Enterprise System (VM_15)	Ongoing monitoring and maintenance	Achieved	Completed all work
8.2.4 Vegetation Management Enterprise System	Implementation of iRestore tree database	Achieved	Completed all work
8.2.5 Quality Assurance / Quality Control (VM_16)	72 vegetation QCs 99% pass rate	131 vegetation QCs 99% pass rate	Completed all work
8.2.5 Quality Assurance / Quality Control	Notification of QC results through Kintone Application	Achieved	Completed all work
8.2.5 Quality Assurance / Quality Control	**Update vegetation management plan every three years**	**Did not achieve**	**Did not complete all work**
8.2.6 Open Work Orders **(VM_17)**	**All work orders resolved within targeted timeframes**	**Did not achieve**	**Did not complete all work**
8.2.7 Workforce planning (VM_18)	Verify appropriate staffing levels for wildfire related activities	Achieved	Completed all work

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
8.2.7 Workforce Planning	Field Inspector training	Achieved	Completed all work
8.2.7 Workforce Planning	**Vegetation management staff certifications**	**Did not achieve**	**Did not complete all work**

*BVES informed Energy Safety in its 2025 WMP Update that the targeted mileage was updated from 211 circuit miles to 205 due to updates made to BVES's GIS layers after the approval of its 2023-2025 WMP.[51] Energy Safety accepted this change. The updated target value is reflected in this table.
** BVES informed Energy Safety in its 2025 WMP Update that it included a target of 211 circuit miles for target VM_6 in its 2023-2025 WMP in error and that the target was intended to be 144 substation inspections.[52] Energy Safety accepted this change. The updated target value is reflected in this table.
†Unit of measure for reported actuals did not match WMP target unit of measure, but work was found to be complete.
++ CAP response required

[51] Bear Valley Electric Service, 2025 Wildfire Mitigation Plan Update, Published April 2, 2024, p. 12, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true).
[52] Bear Valley Electric Service, 2025 Wildfire Mitigation Plan Update, Published April 2, 2024, p. 12, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true).

Analysis of Initiative Completion

8.2.2 Vegetation Management Inspections

The purpose of this initiative is to describe the "Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment."[53] Inspection activities along Distribution lines included Detailed, Patrol, UAV HD Photography / Videography, LiDAR, 3rd Party Ground Patrol, and Substation inspections. These programs are analyzed in the sub-sections below.

8.2.2.1 Detailed Inspection

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[54] For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2024 Target	Completed in 2024
Detailed Inspection (VM_1)	51 circuit miles	51 circuit miles

Supporting Information and Analysis: BVES provided an Excel file containing records of detailed vegetation inspections conducted in 2024 which included the circuit name, inspection date, and mileage inspected in each circuit.[55] The Excel file indicated that BVES completed 51 circuit miles of detailed vegetation inspections in 2024, meeting its target.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

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[53] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

[54] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 192, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

[55] Data Request OEIS-E-SVM_2025-BVES-001, question 1; attachment "1. Detailed Inspection Circuits.xlsx."

8.2.2.2 Patrol Inspection

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[56] For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2024 Target	Completed in 2024
Patrol Inspection (VM_2)	205 circuit miles*	205 circuit miles

* BVES informed Energy Safety in its 2025 WMP Update that the targeted mileage was updated from 211 circuit miles to 205 due to updates made to BVES's GIS layers after the approval of its 2023-2025 WMP.[57] Energy Safety accepted this change. The updated target value is reflected in this table.

Supporting Information and Analysis: BVES provided an Excel file containing records of patrol vegetation inspections conducted in 2024 which included the circuit name, date of inspection, and number of miles inspected per circuit.[58] The Excel file indicated that BVES completed 205 circuit miles of patrol inspections in 2024, meeting its target.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

[56] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 192, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[57] Bear Valley Electric Service, 2025 Wildfire Mitigation Plan Update, Published April 2, 2024, p. 12, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true).
[58] Data Request OEIS-E-SVM_2025-BVES-001, question 3; attachment "3. Patrol Inspection Record 2024.xlsx."

8.2.2.3 UAV HD Photography / Videography Inspection

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[59] For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2024 Target	Completed in 2024
UAV HD Photography / Videography (VM_3)	**205 circuit miles***	**6,593 pole locations**

* BVES informed Energy Safety in its 2025 WMP Update that the targeted mileage was updated from 211 circuit miles to 205 due to updates made to BVES's GIS layers after the approval of its 2023-2025 WMP.[60] Energy Safety accepted this change. The updated target value is reflected in this table.

Supporting Information and Analysis: BVES provided an invoice from its contractor, dated October 31, 2024, requesting payment for UAV Data Acquisition, flight planning, and data management that was completed between April and July of 2024.[61] BVES stated that the work included the inspection of all primary poles in its system which sums to 205 circuit miles.[62]

BVES also provided an Excel file of UAV inspection records from 2024, which included the location (latitude and longitude), unique identification number for each primary pole location that was inspected and the date each primary pole location was inspected.[63] The Excel file indicated that BVES utilized UAV technology to inspect 6,593 pole locations in 2024. BVES stated that "[i]n 2024 there were approximately 6,600 primary poles in the BVES service territory, plus or minus 20-30 poles depending on the time assessed."[64]

[59] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 193, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[60] Bear Valley Electric Service, 2025 Wildfire Mitigation Plan Update, Published April 2, 2024, p. 12, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true).
[61] Data Request OEIS-E-SVM_2025-BVES-001, question 6; attachment "6. UAV Invoice.pdf."
[62] Data Request OEIS-E-SVM_2025-BVES-001, question 7; attachment "Data Request OEIS-E-SVM_2025-BVES-001 RESPONSE.pdf," p. 4.
[63] Data Request OEIS-E-SVM_2025-BVES-002, question 2; attachment "2. UAV updated spreadsheet.xlsx."
[64] Data Request OEIS-E-SVM_2025-BVES-001, question 7; attachment "Data Request OEIS-E-SVM_2025-BVES-002 RESPONSE.pdf," p. 2.

BVES provided a second Excel file containing the locations and dates of all 10 vegetation compliance discrepancies identified by UAV Inspections in 2024.[65] BVES stated that all of the findings were within 10 feet of a pole.[66]

As BVES's target utilized a reporting metric that was in circuit miles as opposed to number of poles inspected, Energy Safety asked BVES to explain the capabilities of its UAV inspection program and whether its UAV technology inspected for vegetation compliance discrepancies not only at the immediate location surrounding its primary pole assets but also the conductors which span between the pole assets. In response, BVES stated: "The UAV does put a priority on the immediate area around each pole. However, the photos are able to see down the line from some angles. It can be difficult to see encroachment from photos because of the perception of depth in photos. Obvious encroachment down the lines should be seen by the inspector."[67]

The documentation BVES provided only demonstrated UAV inspections were conducted within the areas immediately surrounding pole locations. While the documentation demonstrated that all poles in its service area were inspected with UAV, it did not demonstrate that all of its conductor line miles were inspected. Because BVES stated that the UAV technology had limited capability to detect vegetation compliance issues along the conductors between primary poles, BVES did not demonstrate that UAV inspections were completed along 205 circuit miles.

Conclusion: BVES did not provide information consistent with the completion of work identified in this target.

[65] Data Request OEIS-E-SVM_2025-BVES-002, question 1; attachment "1.UAV findings.xlsx."
[66] Data Request OEIS-E-SVM_2025-BVES-002, question 1; attachment "Data Request OEIS-E-SVM_2025-BVES-002.pdf," p. 2.
[67] Data Request OEIS-E-SVM_2025-BVES-001, question 7; attachment "Data Request OEIS-E-SVM_2025-BVES-001 RESPONSE.pdf," p. 4.

8.2.2.4 LiDAR Inspection

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[68] For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2024 Target	Completed in 2024
LiDAR Inspection (VM_4)	205 circuit miles*	205 circuit miles

* BVES informed Energy Safety in its 2025 WMP Update that the targeted mileage was updated from 211 circuit miles to 205 due to updates made to BVES's GIS layers after the approval of its 2023-2025 WMP.[69] Energy Safety accepted this change. The updated target value is reflected in this table.

Supporting Information and Analysis: BVES provided a map of its service territory depicting the dates that each portion of its service territory was inspected via LiDAR.[70] The map indicated that BVES's entire 205 circuit mile overhead system was inspected over the course of four days from April 14, 2024 to April 17, 2024.

BVES also provided an invoice from its contractor, dated June 30, 2024, requesting payment for LiDAR inspection work completed that year.[71] In addition, BVES provided an Excel file listing vegetation compliance discrepancies identified during the 2024 LiDAR inspections. The file indicated that 190 discrepancies were identified.[72]

Conclusion: BVES provided information consistent with the completion of work identified in this target.

[68] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 193, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[69] Bear Valley Electric Service, 2025 Wildfire Mitigation Plan Update, Published April 2, 2024, p. 12, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true).
[70] Data Request OEIS-E-SVM_2025-BVES-001, question 8; attachment "8. LiDAR Dates Completed.pdf."
[71] Data Request OEIS-E-SVM_2025-BVES-001, question 10; attachment "10. LiDAR Invoice.pdf."
[72] Data Request OEIS-E-SVM_2025-BVES-001, question 9; attachment "37. 2024 LiDAR work.pdf."

8.2.2.5 3rd Party Ground Patrol Inspection

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[73] For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2024 Target	Completed in 2024
3rd Party Ground Patrol (VM_5)	205 circuit miles*	205 circuit miles

* BVES informed Energy Safety in its 2025 WMP Update that the targeted mileage for target VM_5 was updated from 211 circuit miles to 205 due to updates made to BVES's GIS layers after the approval of its 2023-2025 WMP.[74] Energy Safety accepted this change. The updated target value is reflected in this table.

Supporting Information and Analysis: BVES provided an Excel file containing results from its 2024 3rd Party Ground Patrol Inspections.[75] The file included the location (latitude and longitude) of each inspection, along with unique identification numbers for each inspected primary pole location. The Excel file indicated that 3rd party ground patrols inspected 6,615 primary pole locations and the conductor spanning between pole locations in 2024 for vegetation compliance issues, such as encroachment within six feet of primary conductors. BVES stated that "[i]n 2024 there were approximately 6,600 primary poles in the BVES service territory, plus or minus 20-30 poles depending on the time assessed."[76]

Because BVES's WMP target utilized a reporting metric that was in circuit miles as opposed to number of poles inspected, Energy Safety submitted a data request asking BVES to clarify the scope of its 3rd Party Ground Patrol Inspections Program, specifically whether the inspections covered only the area immediately around each pole or also the conductors between poles. In response, BVES stated that the program "… is a patrol inspection that inspects around each primary pole along with the conductor in between each pole."[77]

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[73] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November, 16, 2023, p. 193, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[74] Bear Valley Electric Service, 2025 Wildfire Mitigation Plan Update, Published April 2, 2024, p. 12, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true).
[75] Data Request OEIS-E-SVM_2025-BVES-001, question 11; attachment "11. 2024 3rd party Ground patrol.pdf."
[76] Data Request OEIS-E-SVM_2025-BVES-001, question 7; attachment "Data Request OEIS-E-SVM_2025-BVES-002 RESPONSE.pdf," p. 2.
[77] Data Request OEIS-E-SVM_2025-BVES-001, question 12; attachment ""Energy Safety DR-277 Response.pdf," p. 6.

The Excel file BVES provided included columns to track issues with conductor and these columns combined with evidence in the Site Comments column indicating that inspectors looked at the power lines between poles, support BVES's statement that the patrol inspections inspect both primary poles and conductors between poles. Therefore, Energy Safety accepts that the scope of 3rd Party Ground Patrol Inspections encompassed all circuit miles associated with the poles.

While the unit of measure for this target is circuit miles and BVES did not record its 3rd Party Ground Patrol Inspections in this unit of measure, the evidence supports BVES inspected its entire overhead system, totaling 205 circuit miles, and therefore met its 3rd Party Ground Patrol (VM_5) target.

Conclusion: Energy Safety was able to use the documentation provided to determine that the initiative work was completed. While this commitment was not determined to be deficient, Energy Safety has identified potential areas of improvement in BVES's record keeping of its annual 3rd Party Ground Patrol inspections. Therefore, Energy Safety requests BVES meet with Energy Safety to discuss possible record keeping improvements and provide a CAP response that outlines any corrective actions that were identified in the meeting.

8.2.2.6 Substation Inspection

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[78] For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2024 Target	Completed in 2024
Substation Inspection (VM_6)	144 inspections*	156 inspections

*BVES informed Energy Safety in its 2025 WMP Update that it included a target of 211 circuit miles for target VM_6 in its 2023-2025 WMP in error and that the target was intended to be 144 substation inspections.[79] Energy Safety accepted this change. The updated target value is reflected in this table.

[78] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 193, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[79] Bear Valley Electric Service, 2025 Wildfire Mitigation Plan Update, Published April 2, 2024, p. 12, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true).

Supporting Information and Analysis: BVES provided PDF files of "Substation Inspection Sheets" completed and signed by BVES inspectors in 2024. [80] Each sheet included a checklist of required inspection activities. The checklists indicated that inspectors were required to inspect each substation for the presence of “weeds and trash.” Several of the sheets indicated that inspectors identified weed growth at substation sites and prescribed weed abatement measures in response.

In total, 156 Substation Inspection Sheets were completed and signed in 2024. The sheets indicated that all 13 of BVES’s substations were inspected monthly throughout the year and that BVES exceeded its substation vegetation inspections target by completing 156 substation inspections in 2024.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Finding- 8.2.2 Vegetation Management Inspections

BVES did not provide information consistent with the completion of work identified in initiative 8.2.2 Vegetation Management Inspections. Therefore, Energy Safety concludes that initiative 8.2.2 Vegetation Management Inspections is deficient.

Energy Safety requests that BVES schedule a meeting during the development of its CAP to discuss strategies for enhancing annual UAV inspections to include more detailed assessments of vegetation located along the conductors between BVES’s pole assets.

Additionally, Energy Safety requests BVES to schedule a meeting with Energy Safety to discuss possible record keeping improvements related to its annual 3rd Party Ground Patrol inspections and provide a CAP response that outlines any corrective actions that were identified in the meeting.

8.2.3.1 Vegetation and Fuels Management- Pole Clearing

The purpose of this initiative was to describe the “Plan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).” [81]

[80] Data Request OEIS-E-SVM_2025-BVES-001, question 14; attachment “14. Substation Inspection Records.”
[81] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

Narrative Statements, Supporting Information, and Analysis

Statement 1

Statement: "BVES has a vegetation management plan in place that meets or exceeds the [Public Resource Code] PRC 4292."[82] […] "For poles or structures that have non-exempt equipment per CALFIRE requirements, all flammable material and vegetation in a 10-foot radius around the base of the pole or structure shall be cut down and removed during each normal vegetation management cycle clearance visit. Exceptions per the effective California Power Line Fire Prevention Field Guide are authorized. BVES also clears around exempt poles, where possible."[83]

Supporting Information and Analysis: Energy Safety requested documentation from BVES regarding pole clearing work performed in 2024. Specifically, the request asked for the date each pole was inspected, cleared of vegetation, and whether each activity was conducted to meet Public Resources Code (PRC) 4292 requirements.

In response, BVES stated:

> BVES completed pole brushing on 70 poles located on its Radford line which was reconstructed in 2024. BVES did not conduct pole brushing on any other additional poles. BVES created an action plan for the 2023 SVM audit in 2025 to create a more up-to-date pole brushing program beginning in 2026.[84]

BVES also stated that it did not know the locations of all poles within its service territory that had non-exempt equipment under PRC 4292 in 2024, but that the 70 poles brushed on the Radford line have equipment which is exempt from PRC 4292 requirements.[85]

BVES provided a Request for Proposals from 2020 which set a requirement for BVES's contractor to clear vegetation at the base of the poles on the Radford line.[86] However, BVES could not provide documentation indicating that the stated pole clearing work was completed in 2024. Additionally, pole clearing work on the Radford line, which BVES stated

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[82] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 203, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[83] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 203, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[84] Data Request OEIS-E-SVM_2025-BVES-001, question 15; attachment "Data Request OEIS-E-SVM_2025-BVES-001 RESPONSE.pdf," p. 7.
[85] Data Request OEIS-E-SVM_2025-BVES-001, question 16; attachment "Data Request OEIS-E-SVM_2025-BVES-001 RESPONSE.pdf," p. 7, Data Request OEIS-E-SVM_2025-BVES-001, question 16; attachment "Data Request OEIS-E-SVM_2025-BVES-001 RESPONSE.pdf," p. 7.
[86] Data Request OEIS-E-SVM_2025-BVES-002, question 3; attachment "3. Radford Construction RFP and Appendices A-D.pdf."

was exempt from PRC 4292, did not demonstrate that any pole clearing work was conducted on poles with PRC 4292 non-exempt equipment, as described in Statement 1.

Without documentation to support that BVES inspected its non-exempt PRC 4292 equipment for vegetation compliance discrepancies and performed vegetation clearing work when necessary, or documentation to support that all poles in BVES's system were exempt from PRC 4292 requirements in 2024, Energy Safety could not verify that BVES met or exceeded PRC 4292 requirements as stated in its 2023-2025 WMP. Further, BVES stated that it did not know the PRC 4292 exemption status of all poles in its service territory and therefore BVES did not demonstrate that it met the objective of this initiative to reduce wildfire risk associated with vegetation near its pole assets.

Conclusion: BVES did not provide information consistent with the completion of work identified in this statement.

Finding- 8.2.3.1 Pole Clearing

BVES did not provide information consistent with the completion of work identified in initiative 8.2.3.1 Pole Clearing. Therefore, Energy Safety concludes that initiative 8.2.3.1 Pole Clearing is deficient.

Energy Safety's audit of BVES's 2023 vegetation management work also identified deficiencies in BVES's record keeping of PRC 4292 non-exempt equipment and completion of pole clearing work. [87] In its CAP response to Energy Safety's 2023 SVM Audit, BVES stated:

> BVES will establish a process to document and maintain records of each occurrence of when non-exempt equipment is identified and replaced. Also, records will be maintained for pole clear activities. This process will be in place by July 1, 2025. Additionally, as part of BVES's 2026-2028 WMP, BVES has developed a plan to conduct pole brushing on a selected number of poles that have either non-exempt equipment or are in extreme fire threat areas (High Fire Threat District (HFTD) Tier 3) beginning in 2026. As poles are identified with non-exempt equipment installed through inspections, they will be added to the annual pole brushing program. [88]

In its CAP response to Energy Safety's 2024 WMP vegetation management audit, BVES must provide an update on its progress implementing these corrective actions.

[87] Office of Energy Infrastructure Safety, 2023 SVM Audit of BVES, Published March 3, 2025, p. A-12, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).
[88] Bear Valley Electric Service, 2023 SVM Audit CAP, Published April 2, 2025, pp. 1-2, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).

8.2.3.2 Vegetation and Fuels Management- Wood and Slash Management

The purpose of this initiative was to take actions "to manage all downed wood and "slash" generated from vegetation management activities."[89]

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[90] Because it was included in BVES's target table, it is summarized in the table below to be consistent with the structure of BVES's WMP.

Initiative Activity	BVES's 2024 Target	Completed in 2024
Wood and Slash Management (VM_8)	Contractor adherence to waste removal procedure	Completed all work

Supporting Information and Analysis: BVES states in its 2023-2025 WMP that "BVES's vegetation clearance contractor clears vegetation and removes all vegetation waste and slash from the area every day. If the property owner wants the vegetation waste (for firewood, chipping, etc.), the contractor will assist the property owner in removing the vegetation waste from the rights-of-way for their use."[91] BVES provided its Fuel Management and Reduction of Slash Policy, which outlined BVES's guidelines for the wood and slash disposal practices to which its contractors must adhere.[92]

BVES also submitted an invoice detailing vegetation management work performed by its contractor in July 2024.[93] The invoice indicated that vegetation management crews were equipped with equipment to break down vegetation debris into wood chips, and that debris chipping was included as part of the completed work. Additionally, BVES provided an Excel file listing 206 "brush clean-up" work orders that were completed by its contractor in 2024.[94]

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[89] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[90] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 193, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[91] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 204, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[92] Data Request OEIS-E-SVM_2025-BVES-001, question 17; attachment "17. Policy of Fuel Management and Reduction of Slash.pdf."
[93] Data Request OEIS-E-SVM_2025-BVES-001, question 18; attachment "18. 7.27.2024 Invoice.pdf."
[94] Data Request OEIS-E-SVM_2025-BVES-001, question 36; attachment "36. 2024 Work Orders.pdf."

The information provided indicated that BVES had procedural documents in place that outlined its waste removal requirements, that the contractor was equipped to perform waste removal requirements and that the contractor completed waste removal work in 2024.

Additionally, BVES stated that in 2025, it has moved to a new enterprise system which gave BVES the option to track the removal of all wood and slash that is generated by its vegetation management work, a capability that its 2024 vegetation management system did not have.[95] BVES stated that the new enterprise system allows vegetation management crews to record when wood and slash is removed from a location, and allows BVES's contracted forester to record when a quality control check has been performed to ensure that wood and slash was appropriately managed. These new record keeping capabilities described by BVES will improve BVES's ability to ensure that wood and slash generated by its vegetation management work is managed in a way that reduces ignition risk and spread of wildfire. Energy Safety will assess BVES's implementation of these new record keeping abilities in future WMP Vegetation Management Audits.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Finding- 8.2.3.2 Wood and Slash Management

BVES provided information consistent with the completion of work identified in initiative 8.2.3.2 Wood and Slash Management. Therefore, Energy Safety concludes that initiative 8.2.3.2 Wood and Slash Management is complete.

However, in its CAP, BVES must include updates detailing its progress in implementing and using the enhanced capabilities of its new enterprise system to track and verify that all wood and slash generated by vegetation management activities is handled in a manner that reduces ignition risk and wildfire spread.

8.2.3.3 Vegetation and Fuels Management- Clearance

The purpose of this initiative was to take actions "after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming."[96]

[95] Data Request OEIS-E-SVM_2025-BVES-002, question 4; attachment "Data Request OEIS-E-SVM_2025-BVES-002 RESPONSE.pdf," p. 4.

[96] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[97] For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2024 Target	Completed in 2024
Clearance (VM_9)	72 circuit miles	6,251 clearance activities

Supporting Information and Analysis: BVES divided its service territory into square grids, each assigned a unique identification number.[98] BVES provided an Excel file listing the grids where vegetation clearance work was performed in 2024, including the unique ID for each grid and the number of circuit miles cleared within it.[99] The Excel file reported that BVES completed vegetation clearance work along 100 circuit miles across 28 grids in its service territory. but did not include any information to link completed vegetation work to these circuit miles to substantiate that the 100 circuit miles were cleared. BVES also provided an Excel file containing records of vegetation work orders from 2024 to substantiate clearance work completed in its service territory. The Excel file included a column titled "Trim Style," which described the type of vegetation work completed for each work order. The Excel file indicated that BVES completed a "slope," "top," or "side," trim on 6,251 trees to maintain clearance from its electrical infrastructure in 2024.[100] However, the work orders do not indicate the number of circuit miles cleared as a result of the individual tree timing activities.

Energy Safety also reviewed BVES's spatial QDR submissions, which included a map of its service territory showing the grids where vegetation clearance work was performed, as well as the locations of individual trees that were trimmed.[101] However, the spatial QDR data did not represent progress toward BVES's VM_9 target using linear geospatial geometry. Without clearance work reported in the same unit of measure as the WMP target, BVES could not substantiate that it cleared 100 circuit miles.

While the information provided by BVES indicated that vegetation clearance work was conducted throughout BVES's service territory in 2024, it does not demonstrate how BVES determined that 100 circuit miles were cleared. The documentation does not explain the methodology used to calculate the number of circuit miles cleared based on individual tree

[97] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 190, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[98] Bear Valley Electric Service, Geospatial 2024 quarters 1-4 Quarterly Data Report.
[99] Data Request OEIS-E-SVM_2025-BVES-001, question 20; attachment "20. Circuit Milage.xlsx."
[100] Data Request OEIS-E-SVM_2025-BVES-001, question 36; attachment "36. 2024 Work Orders.xlsx."
[101] BVES's geospatial 2024 quarters 1-4 Quarterly Data Report.

work. Without a link between the individual clearance activities and the circuit miles cleared, BVES did not demonstrate that it met its clearance target.

Conclusion: BVES did not provide information consistent with the completion of work identified in this target.

Finding- 8.2.3.3 Clearance

BVES did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.3 Clearance is deficient.

In its CAP, BVES must explain the methodology it used to determine the number of circuit miles that were cleared as part of its VM_9 target in 2024. BVES must also provide records of inspection and clearance work completed in 2024 under the VM_9 target with a clear link between individual vegetation clearance activities and the number of circuit miles that it determined were cleared as a result of each individual activity. If BVES cannot provide this information, it must submit corrective actions with implementation timelines describing how it will document this information in future performance years.

8.2.3.4 Vegetation and Fuels Management- Fall-in Mitigation

The purpose of this initiative was to take actions "to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment."[102]

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[103] For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2024 Target	Completed in 2024
Fall-in Mitigation (VM_10)	88 trees	182 trees

Supporting Information and Analysis: BVES provided an Excel file containing records of all tree removal work completed by BVES in 2024.[104] The Excel file included tree location and species information for each tree removed, the date each tree was assigned removal work, and the date the removal work was completed. The Excel file indicated that BVES removed 182 trees in 2024, exceeding its fall-in mitigation target.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Finding- 8.2.3.4: Fall-in Mitigation

BVES provided information consistent with the completion of work identified in initiative 8.2.3.4 Fall-in Mitigation. Therefore, Energy Safety concludes that initiative 8.2.3.4 Fall-in Mitigation is complete.

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[102] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

[103] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 190, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

[104] Data Request OEIS-E-SVM_2025-BVES-001, question 21; attachment "21. 2024 Removals.xlsx."

8.2.3.5 Vegetation and Fuels Management- Substation Defensible Space

The purpose of this initiative was to take actions "to reduce ignition probability and wildfire consequence due to contact with substation equipment."[105]

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[106] For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2024 Target	Completed in 2024
Substation Defensible Space (VM_11)	13 substations	13 substations

Supporting Information and Analysis: In addition to its substation vegetation inspection target, BVES included a substation defensible space target in its 2023–2025 WMP, focused on vegetation management around its substations. BVES provided an Excel file containing records of vegetation management work completed at its substations in 2024, including the dates work was performed at each substation. The Excel file indicated that vegetation management work was completed at each of BVES's 13 substations in 2024.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Finding- 8.2.3.5: Substation Defensible Space

BVES provided information consistent with the completion of work identified in initiative 8.2.3.5 Substation Defensible Space. Therefore, Energy Safety concludes that initiative 8.2.3.5 Substation Defensible Space is complete.

[105] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[106] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 190, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

8.2.3.6 Vegetation and Fuels Management- High-Risk Species

The purpose of this initiative was to take actions "to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation."[107]

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP. [108] Because it was included in BVES's target table, it is summarized in the table below to be consistent with the structure of BVES's WMP.

Initiative Activity	BVES's 2024 Target	Completed in 2024
High-Risk Species (VM_12)	WMP plan review and vegetation discussion with experts	Achieved

Supporting Information and Analysis: BVES provided its 2024 Vegetation Management Program Annual Audit, which was conducted by its Contract Forester. [109] The audit evaluated BVES's vegetation management activities as outlined in its 2023–2025 WMP, including line clearance work, inspections, and quality control checks.

Overall, the forester found BVES's vegetation management activities to be adequate. However, the report noted that most vegetation compliance discrepancies were due to rapid tree growth and contractors failing to achieve the required clearances during routine pruning. The forester also highlighted that the high number of dead, dying, and diseased trees in BVES's service territory makes it challenging to prioritize and address all necessary mitigation work in a timely manner.[110]

Regarding the overall program, the forester recommended a more aggressive approach to removing problem vegetation to help reduce the number of call-outs.[111] BVES stated that the forester that conducted the audit was a vegetation expert, and provided their credentials

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[107] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[108] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 190, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[109] Data Request OEIS-E-SVM_2025-BVES-001, question 22; attachment "22. Vegetation Management Program Annual Audit 2024.pdf."
[110] Data Request OEIS-E-SVM_2025-BVES-001, question 22; attachment "22. Vegetation Management Program Annual Audit 2024.pdf."
[111] Data Request OEIS-E-SVM_2025-BVES-001, question 22; attachment "22. Vegetation Management Program Annual Audit 2024.pdf."

which indicated that the forester was an International Society of Arboriculture (ISA) Certified Arborist, ISA Tree Risk Assessment Qualified, and an ISA Certified Arborist Utility Specialist.[112]

Energy Safety noted that the same recommendation, to be more aggressive in removing problematic vegetation, was made by the forester in BVES's 2023 Vegetation Management Program Annual Audit.[113] The recurrence of this deficiency suggests that BVES has not acted on the vegetation expert's 2023 recommendation.

The information BVES provided demonstrated that it met the requirement for this target by having a "vegetation expert" review the 2024 vegetation management programs described in its 2023–2025 WMP and offer recommendations for future improvements. However, the purpose of this initiative was to take actions "to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation."[114] As stated by BVES's forester in its 2024 Vegetation Management Program Annual Audit, most vegetation compliance discrepancies were associated with fast growing vegetation and dead, dying, and diseased trees. In both the 2023 and 2024 audit, the forester recommended that BVES take a more aggressive approach in removing problematic vegetation. These findings and repeated recommendations do not demonstrate that BVES's 2024 vegetation management program reduced the ignition probability and wildfire consequences attributed to high-risk species in 2024, or that BVES is working to address its forester's audit findings.

Conclusion: BVES provided information consistent with the completion of work identified in this target. However, BVES must submit a CAP that addresses the forester's recommendation to more aggressively remove problematic vegetation. The CAP must describe BVES's response to the recommendations in the Annual Audit, explain its rationale if it chooses not to adopt the recommendations, and/or detail any corrective actions taken or planned in response to its forester's observations and recommendations. It must also include a realistic implementation timeline aligned with the capabilities of BVES's vegetation management program for any corrective actions included in the CAP.

[112] Data Request OEIS-E-SVM_2025-BVES-002, question 9; attachment "9. Forester Certifications.pdf."
[113] Data Request 259, question 30; attachment "43. Vegetation Management Program Annual Audit 2023.pdf."

[114] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

Narrative Statements, Supporting Information, and Analysis

Statement 2

Statement: "BVES will consider the removal of any fast-growing trees, such as Poplars, Aspens, or Cottonwood, rotten or diseased trees, and healthy trees hanging over or leaning towards bare lines."[115]

Supporting Information and Analysis: BVES provided an Excel file documenting tree removal work completed in 2024.[116] BVES stated that all of the trees listed in the file were removed because they were fast-growing species that the utility considers being a high-risk of encroaching upon its electrical infrastructure.[117]

The Excel file included details such as the location and species of each tree, the date the removal work was assigned, and the date it was completed. In total, BVES removed 31 locust and poplar trees in 2024.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Finding- 8.2.3.6: High-Risk Species

BVES provided information consistent with the completion of work identified in initiative 8.2.3.6 High-Risk Species. However, in the Vegetation Management Program Annual Audit, BVES's contract forester indicated that BVES could further reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation by taking a more aggressive approach in removing problematic vegetation. Similar recommendations were made during the 2023 Audit and have not been addressed. Therefore, Energy Safety concludes that initiative 8.2.3.6 High-Risk Species is deficient.

BVES must submit a CAP that addresses the forester's recommendation to more aggressively remove problematic vegetation. The CAP must describe BVES's response to the recommendations in the Annual Audit, explain its rationale if it chooses not to adopt the recommendations, and/or detail any corrective actions taken or planned in response to its forester's observations and recommendations. It must also include a realistic implementation timeline aligned with the capabilities of BVES's vegetation management program for any corrective actions included in the CAP.

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[115] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 208, URL:
(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[116] Data Request OEIS-E-SVM_2025-BVES-001, question 24; attachment "24. High Risk Species.xlsx."
[117] Data Request OEIS-E-SVM_2025-BVES-001, question 24; attachment "Data Request OEIS-E-SVM_2025-BVES-001 RESPONSE.pdf," p. 10.

8.2.3.7 Vegetation and Fuels Management- Fire-Resilient Rights-of-Way

The purpose of this initiative was to take actions "to promote vegetation communities that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way."[118]

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP. [119] Because it was included in BVES's target table, it is summarized in the table below to be consistent with the structure of BVES's WMP.

Initiative Activity	BVES's 2024 Target	Completed in 2024
Fire-Resilient Rights-of-Way (VM_13)	WMP plan review and vegetation discussion with experts	Achieved

Supporting Information and Analysis: Because this target had the same scope of work as BVES's High-Risk Species (VM_12) target, BVES submitted the same supporting information for both. For Energy Safety's analysis of the information BVES provided in support of this target, refer to the VM_12 target under Initiative 8.2.3.6 High-Risk Species.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

[118] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[119] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 191, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

Narrative Statements, Supporting Information, and Analysis

Statement 3

Statement: "All brush, limbs and foliage in the ROW [right of way] shall be cut up to 8-feet above the ground. All dead, dying, diseased, or dried vegetation from 8 feet above the ground to the top of the power lines must be removed during each normal vegetation management cycle clearance visit."[120]

Supporting Information and Analysis: BVES provided its Vegetation Management Policy and Procedure document which was given to its contracted crews providing specific guidance related to managing vegetation in the ROW, including the procedures detailed in Statement 3 above.[121]

BVES also provided a keyhole markup language zipped (KMZ) file showing the boundaries of a ROW clearance project completed in 2024, overlaid on aerial imagery of BVES's service territory.[122] The file included photos of cleared vegetation and trees marked with flagging, indicating they were scheduled for trimming or removal in accordance with the requirements in this statement. In addition, BVES provided work logs and meeting minutes recorded by its contractor in 2024 indicating that the contractor completed right of way clearance work along BVES's Radford line.[123]

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Finding- 8.2.3.7 Fire-Resilient Rights-of-Way

BVES provided information consistent with the completion of work identified in initiative 8.2.3.7 Fire-Resilient Rights-of-Way. Therefore, Energy Safety concludes that initiative 8.2.3.7 Fire-Resilient Rights-of-Way is complete.

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[120] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 209, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[121] Data Request OEIS-E-SVM_2025-BVES-001, question 26; attachment "26. BVES VM policies and procedures.pdf."
[122] Data Request OEIS-E-SVM_2025-BVES-001, question 27; attachment "27. BVES Veg Mgt 9.27.2024.KMZ."
[123] Data Request OEIS-E-SVM_2025-BVES-002, question 5; attachments "5. BVESRadfordProject_20241025_PAR_Daily Schedule.pdf," "5. BVESRadford_20241016_PAR Ph 2 Weekly Construction Meeting Minutes.pdf."

8.2.3.8 Emergency Response Vegetation Management

The purpose of this initiative was the "planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration." [124]

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP. [125] Because it was included in BVES's target table, it is summarized in the table below to be consistent with the structure of BVES's WMP.

Initiative Activity	BVES's 2024 Target	Completed in 2024
Fire-Resilient Rights-of-Way (VM_14)	Verification of readiness and review of plan	Achieved

Supporting Information and Analysis: BVES provided its Emergency and Disaster Response Plan, which states: "The Emergency & Disaster Response Plan (EDRP) is provided to all Bear Valley Electric Service, Inc. ("BVES") employees to ensure an efficient, effective, and uniform response during an emergency situation." [126] The plan was last updated on March 31, 2022 (Revision 2).

BVES also provided an Excel file with attendance records for two Public Safety Power Shutoff emergency response training exercises conducted in 2024. [127] The records indicated that three BVES internal staff members attended both events. Additionally, BVES provided an agenda from the events, which described the emergency response scenarios that staff role-played. [128]

The agenda indicated that one scenario involved responding to a high wind event with an elevated risk of tree falls, line damage, and fire ignition. The agenda also indicated that part of each event was dedicated to evaluating their effectiveness and gathering feedback from

[124] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[125] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 191, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[126] Data Request OEIS-E-SVM_2025-BVES-001, question 28; attachment "28. BVES INC Emergency Response and Disaster Plan Rev2.pdf."
[127] Data Request OEIS-E-SVM_2025-BVES-001, question 29; attachment "29. PSPS and Emergency Response Procedure Review.pdf."
[128] Data Request OEIS-E-SVM_2025-BVES-002, question 6; attachment "6. BVES 2024 Situation Manual.docx."

both internal and external stakeholders. BVES stated that during the exercises, "...operational supervisors role played the sequence of operational decisions for emergency situation and extreme weather…[including] resource management and considering how to best use crew efficiently…"[129]

The provided information indicated that BVES had an emergency response plan in place in 2024, conducted simulation exercises to practice implementing it, and engaged in performance evaluation and feedback discussions with both internal and external stakeholders regarding BVES's emergency response readiness.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Narrative Statements, Supporting Information, and Analysis

Statement 4

Statement: "Emergency vegetation clearance… includes completing maintenance on an as needed basis for any major disaster or emergency events. For example, if a storm results in fallen trees and branches, the contractor must mobilize as soon as possible to clear the vegetation."[130]

Supporting Information and Analysis: BVES provided a completed work approval form documenting the hours of emergency vegetation clearance work performed by contracted crews in response to a storm event in February 2024. [131] The form indicated that BVES's contractors performed 53 hours of emergency vegetation clearance work in response to this storm event.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Finding- 8.2.3.8: Emergency Response Vegetation Management

BVES provided information consistent with the completion of work identified in initiative 8.2.3.8 Emergency Response Vegetation Management. Therefore, Energy Safety concludes that initiative 8.2.3.8 Emergency Response Vegetation Management is complete.

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[129] Data Request OEIS-E-SVM_2025-BVES-002, question 6; attachment "Data Request OEIS-E-SVM_2025-BVES-002.pdf," pp. 5-6.
[130] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 210, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[131] Data Request OEIS-E-SVM_2025-BVES-001, question 31; attachment "31. Storm coverage invoice.pdf."

8.2.4 Vegetation Management Enterprise System

The purpose of this initiative was to describe the "Operation of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work."[132]

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[133] Because it was included in BVES's target table, it is summarized in the table below to be consistent with the structure of BVES's WMP.

Initiative Activity	BVES's 2024 Target	Completed in 2024
Vegetation Management Enterprise System (VM_15)	Ongoing monitoring and maintenance of vegetation management enterprise system	Achieved

Supporting Information and Analysis: BVES provided a signed contract with iRestore, a vegetation management enterprise system software developer, dated January 2022. The contract confirmed a multi-year agreement for ongoing software access, training, maintenance, and technical support for BVES's vegetation management enterprise system until 2027.[134]

Conclusion: BVES provided information consistent with the completion of work identified in this target.

[132] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[133] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 191, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[134] Data Request OEIS-E-SVM_2025-BVES-001, question 32; attachment "32. iRestore Costs.pdf."

Narrative Statements, Supporting Information, and Analysis

Statement 5

Statement: "the iRestore tree database creates a unique ID for each tree and holds extensive data on each tree (such as species, height, condition, etc.). The database will provide real-time vegetation inspection data available to users, trimming status, geolocation, among other things. The software will provide alerts on trees that require revisiting based on growth rates. Additionally, the software will alert when a tree is about to exceed its review time based on the cycle schedule."[135]

Supporting Information and Analysis: BVES provided a screenshot of the iRestore application.[136] The screenshot included information regarding a pine tree that had been trimmed in 2024. The Screenshot indicated that the tree was assigned a unique identification number, and that iRestore had the capability to record the tree's location information, when the tree was last inspected, an estimated next trim date, and a picture of the tree.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Finding- 8.2.4 Vegetation Management Enterprise System

BVES provided information consistent with the completion of work identified in initiative 8.2.4 Vegetation Management Enterprise System. Therefore, Energy Safety concludes initiative 8.2.4 Vegetation Management Enterprise System is complete.

[135] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 211, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[136] Data Request OEIS-E-SVM_2025-BVES-001, question 33; attachment "33. iRestore Record.pdf."

8.2.5 Quality Assurance and Quality Control

The purpose of this initiative was to describe the "Establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes."[137]

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[138] For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2024 Target	Completed in 2024
Quality Assurance / Quality Control (VM_16)	72 vegetation QCs 99% pass rate	131 vegetation QCs 99% pass rate

Supporting Information and Analysis: BVES provided an Excel file containing records of vegetation quality checks (QCs) performed in 2024.[139] The Excel file included the inspector's name, QC date, location, number of trees inspected at each QC location, and the result of each QC. The Excel file indicated that in 2024, BVES conducted 131 vegetation QCs at different locations in BVES's service area, exceeding its target.

At each location, BVES staff inspected nearby trees to ensure compliance with relevant regulations and internal procedures. In doing so, BVES inspected a total of 1,519 trees during 2024 vegetation QCs, of which, only two were reported to be out of compliance resulting in a 99.99% pass rate, thus exceeding its 99% pass rate for trees inspected. The information provided indicated that BVES exceeded its quality assurance and quality control target in 2024.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

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[137] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

[138] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 191, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

[139] Data Request OEIS-E-SVM_2025-BVES-001, question 34; attachment "34. QA.QC Record.pdf."

Narrative Statements, Supporting Information, and Analysis

Statement 6

Statement: "BVES conducts frequent QC checks of its vegetation contractor's work execution. Discrepancies noted during QC checks, detailed inspections, patrols of overhead circuits, or other means, are generally forwarded to contracted resource via the Kintone Tree Trimming QC application provided by BVES. The contractor responds by marking whether completion of corrective actions is achieved through the software database."[140]

Supporting Information and Analysis: BVES provided an Excel file generated from the Kintone Tree Trimming QC application, which included all vegetation compliance discrepancies identified during QCs in 2024.[141] The file included information such as the inspector's name, inspection and remediation dates, location, and descriptions of the discrepancies.

The Excel file indicated that BVES identified two vegetation compliance discrepancies during 2024 QC inspections. Both were remediated within 18 days.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Statement 7

Statement: "BVES has a vegetation management plan in place that meets or exceeds the minimum requirements of the CPUC's applicable GOs… The plan will be reviewed and updated on an as needed basis not to exceed three years, depending on changing conditions."[142]

Supporting Information and Analysis: Energy Safety noted that Statement 7 appears in multiple sections of BVES's 2023–2025 WMP. Because BVES's vegetation management plan includes procedures relevant to several initiatives, Energy Safety evaluated this statement under the Quality Assurance and Quality Control (QA/QC) Initiative, as it involves reviewing and updating a plan, an activity aligned with QA/QC practices.

BVES provided its vegetation management plan titled "Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs Revision 1."[143] The plan included

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[140] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 215, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[141] Data Request OEIS-E-SVM_2025-BVES-001, question 34; attachment "34. QA.QC Record.pdf."
[142] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, pp. 203, 204, 207, 208, 209, 210, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[143] Data Request OEIS-E-SVM_2025-BVES-001, question 23; attachment "23. BVES INC Vegetation Management and Vegetation Management QC Programs Policy and Procedures Rev1.pdf."

procedural requirements that met or exceeded the CPUC's General Order (GO) 95, Rules 35 and 18, as stated in BVES's 2023-2025 WMP.

BVES stated that the plan was last updated in October 2021, which is consistent with the publication date listed in the plan document. Furthermore, BVES stated that it began updating the plan in 2025 and intends to publish the revised version by the end of 2025.[144] This timeline is inconsistent with BVES's 2023–2025 WMP, which states that "[t]he plan will be reviewed and updated on an as-needed basis, not to exceed three years." [145]

Conclusion: BVES did not provide information consistent with the completion of work identified in this statement.

Finding- 8.2.5 Quality Assurance and Quality Control

BVES did not provide information consistent with the completion of work identified in this Initiative. Therefore, Energy Safety concludes that initiative 8.2.5 Quality Assurance and Quality Control is deficient.

In Its CAP, BVES must either provide the updated Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs procedural document or a status update of when the revised version will be published.

8.2.6 Open Work Orders

The purpose of this initiative was to describe the "Actions taken to manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities."[146]

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP. [147] Because it was included in BVES's target table, it is summarized in the table below to be consistent with the structure of BVES's WMP.

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[144] Data Request OEIS-E-SVM_2025-BVES-001, question 23; attachment "Data Request OEIS-E-SVM_2025-BVES-001.pdf," p. 10.
[145] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, pp. 203, 204, 207, 208, 209, 210, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[146] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[147] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 191, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

Initiative Activity	BVES's 2024 Target	Completed in 2024
Open Work Orders (VM_17)	All work orders resolved within targeted timeframes	Did not complete all work

Supporting Information and Analysis: In its 2023-2025 WMP, BVES stated that:

> When a discrepancy is identified by the vegetation inspector, a work order is created and a severity level (Level 1, 2, or 3 in accordance with GO 95 Rule 18) is applied. The severity will dictate the timeframe for remediation. For vegetation related discrepancies timeframe and example situations are as follow:
>
> - Level 1 – Immediate Action – Vegetation Order Issued to Contractor for Immediate Action
> - Vegetation contacting, nearly contacting or arcing to high voltage conductor, vegetation contacting low voltage conductor and compromising structure, etc.
> - Level 2 – Action within 30 days – Vegetation Order Issued to Contractor for action within 30 days
> - Vegetation within 48 inches of high voltage lines, vegetation causing strain or abrasion on low voltage conductor, tree or portions of tree that are dead, rotten, or diseased that may fall into power lines, etc.
> - Level 3 – Non-urgent Normal Cycle Action – Vegetation Order issued to Contractor for action during the next normal vegetation cycle.[148]

BVES provided an Excel file containing records of all vegetation management work orders completed in 2024.[149] The file included the dates each work order was created and closed, location information, the type of work completed, and the assigned priority level (Levels 1, 2, or 3).

The Excel file indicated that BVES created 6,732 vegetation management work orders in 2024 to address vegetation compliance discrepancies identified during inspections. Of these, 6,490 (96%) were completed within the timeframes required, based on the priority level and the time elapsed between the work order assignment and completion. The remaining 242 work orders did not have an assigned priority level but were completed on the same day they were assigned, meeting the resolution timeframe for Priority 1 work and were thus considered resolved within required timeframes.

[148] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 216, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[149] Data Request OEIS-E-SVM_2025-BVES-001, question 36; attachment "36. 2024 Work Orders.xlsx."

While BVES's records indicated that all work orders were resolved within required time frames, this is misleading because BVES started the time frame following field verification rather than when the discrepancy was first identified. Energy Safety understood these timeframes to begin when BVES was first made aware of a discrepancy (during inspection) and end when appropriate actions to correct a discrepancy were completed. Instead, BVES started the time frame when the work order was assigned.

Energy Safety evaluated the total response time, from initial identification of vegetation compliance discrepancies during inspection to final remediation for all of BVES's vegetation inspection programs. Energy Safety found that discrepancies were remediated within BVES's targeted timeframes for its Patrol, UAV, and 3rd Party Ground Patrol inspection programs.[150, 151] Additionally, BVES stated that its Detailed inspection program did not identify any vegetation discrepancies in 2024.[152]

However, Energy Safety identified significant delays between the time vegetation hazards were identified during LiDAR inspections and when those hazards were remediated. BVES stated that its contractor provided LiDAR data to BVES which identified vegetation hazards on August 8, 2024.[153] However, it took BVES between 11 and 13 days to field-verify Level 1 priority hazards and create the work orders. While the work orders were then completed within 1 day, these hazards were present in BVES's system for an average of 12 days between receipt of LiDAR data and work order assignment. For Level 2 priority hazards, BVES took between 11 and 116 days (an average of 73 days) to field verify and assign a work order for remediation.[154] This delayed response does not demonstrate that BVES took immediate action for Level 1 priority hazards identified by LiDAR inspection or addressed Level 2 priority hazards identified by LiDAR inspection within the required 30-day timeframe.

Conclusion: BVES did not provide information consistent with the completion of work identified in this target.

Finding- 8.2.6: Open Work Orders

BVES did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.6 Open Work Orders is deficient. Energy Safety's audit of BVES's 2023 vegetation management work also identified deficiencies in BVES's ability to respond to vegetation compliance discrepancies identified via

[150] Data Request OEIS-E-SVM_2025-BVES-001, question 38; attachment "38. Ground Patrol Work.xlsx."
[151] Data Request OEIS-E-SVM_2025-BVES-003, question 1; attachment "1. Patrol and UAV Findings.xlsx."
[152] Data Request OEIS-E-SVM_2025-BVES-002, question 10; attachment "Data Request OEIS-E-SVM_2025-BVES-002 RESPONSE.pdf," p. 8.
[153] Data Request OEIS-E-SVM_2025-BVES-001, question 37; attachment "37. 2024 LiDAR work.xlsx."
[154] Data Request OEIS-E-SVM_2025-BVES-001, question 37; attachment "Data Request OEIS-E-SVM_2025-BVES-001 RESPONSE.pdf," p. 16.

LiDAR inspection within the timeframes stated in BVES's 2023-2025 WMP.[155] In its CAP response to Energy Safety's 2023 SVM Audit, BVES stated:

> …BVES is requiring the LiDAR contractor to provide LiDAR findings as soon as the analysis for each individual circuit is completed instead of waiting until all of the complete survey analysis of the entire BVES overhead system is finished. Additionally, BVES is requesting the contractor notify it immediately of any Level 1 findings. With this change in procedures, BVES will be able to inspect findings and complete vegetation work orders within the proper timeframes. These changes will be implemented for the 2025 LiDAR inspection.[156]

In its CAP response to Energy Safety's 2024 WMP vegetation management audit, BVES must provide an update on its progress implementing these corrective actions, as well as any lessons learned or adjustments made in 2025 to ensure vegetation compliance discrepancies are addressed within the timeframes specified in its 2023–2025 WMP. Additionally, Energy Safety expects BVES to assign a priority level to all vegetation management work orders. Doing so will ensure transparency, allow for proper tracking, and confirm that resolution timeframes are met to minimize risk on BVES's system.

8.2.7 Workforce Planning

The purpose of this initiative was to describe "Programs to ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work."[157]

Quantitative Target or Commitment, Supporting Information, and Analysis

BVES included the following target in its 2023-2025 WMP.[158] Because it was included in BVES's target table, it is summarized in the table below to be consistent with the structure of BVES's WMP.

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[155] Office of Energy Infrastructure Safety, 2023 SVM Audit of BVES, Published March 3, 2025, pp. A-30 to A-31 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).
[156] Bear Valley Electric Service, 2023 SVM Audit CAP, Published April 2, 2025, p. 2, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).
[157] Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-26, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[158] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 192, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

Initiative Activity	BVES's 2024 Target	Completed in 2024
Workforce Planning (VM_18)	Verify staffing level for wildfire related activities	Achieved

Supporting Information and Analysis: BVES provided email correspondence between it and its vendor regarding a wildfire that occurred near its service territory in 2024.[159] The email provided guidance to BVES's vendor in the event the wildfire reached BVES's territory, advising the contractor to ensure its crews were ready to evacuate if needed, and to be ready to have two crews ready to perform vegetation clearing work on a rotating schedule in the event trees near BVES's electrical infrastructure were affected by the fire.

BVES also provided its Policy of Fuel Management and Reduction of Slash Procedure which sets requirements and guidelines to which BVES and contracted staff must adhere.[160] The procedure states that "during a major storm event or other disaster, contractor shall be capable of working extended hours and on weekends and holidays as necessary to clear lines as directed by BVES Representative."[161] The procedure indicated that BVES set requirements for its contractor to respond to a disaster event such as a wildfire with appropriate staffing levels should the need arise.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Narrative Statements, Supporting Information, and Analysis

Statement 8

Statement: Table 8-20 "Vegetation Management Qualifications and Training" included in BVES's 2023-2025 WMP set a "special certification requirement" for all of BVES's contracted Tree Trim General Foreman/Supervisors, and Tree Trimmer positions to be [International Society of Arboriculture] ISA certified and have completed Line-Clearance Qualified Tree-Trimmer training."[162]

[159] Data Request OEIS-E-SVM_2025-BVES-001, question 39; attachment "39. Re_ Line Fire.pdf."
[160] Data Request OEIS-E-SVM_2025-BVES-001, question 40; attachment "17. Policy of Fuel Management and Reduction of Slash.pdf."
[161] Data Request OEIS-E-SVM_2025-BVES-001, question 40; attachment "17. Policy of Fuel Management and Reduction of Slash.pdf."
[162] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, pp. 225-226, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

Supporting Information and Analysis: BVES provided an Excel file containing training records for all Tree Trim General Foreman/Supervisors and staff contracted by BVES in 2024.[163] The Excel file indicated that all contracted tree crew staff received training related to tree trimming line clearance work such as tree felling, chainsaw operations, aerial rescue, tree climbing, and rigging in 2024. [164] However, BVES stated that none of the contracted Tree Trim General Foreman/Supervisors nor Tree Trimmers held ISA certifications in 2024.[165] BVES also stated that it has since created an action plan to remove the ISA certification requirement as it does not believe it is necessary.[166] Energy Safety assessed BVES's action plan in its 2023 SVM Audit Report of BVES and determined that BVES's provided action plan will resolve the deficiency.

However, because BVES's contracted tree crews did not meet the ISA certification requirement outlined in its 2023–2025 WMP, Energy Safety concluded that BVES did not complete all work for this initiative during the 2024 performance year.

Conclusion: BVES did not provide information consistent with the completion of work identified in this statement.

Statement 9

Statement: "BVES's Field Inspector performs the Detailed Inspections… The Field Inspector works closely with the contracted Forester to ensure he is equipped to properly inspect vegetation around power lines."[167]

Supporting Information and Analysis: BVES provided a sign-in sheet for a vegetation management policies and procedures training session conducted by BVES's Contract Forester in August of 2024. [168] The sign-in sheet indicated that BVES's field inspector attended the session and received training from the Contract Forester on topics related to vegetation inspections along power lines.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

[163] Data Request OEIS-E-SVM_2025-BVES-002, question 8; attachment "8. Training Log.xlsx."
[164] Data Request 259, question 47; attachment "47. Contractor's Qualifications.xlsx."
[165] Data Request OEIS-E-SVM_2025-BVES-001, question 41; attachment "Data Request OEIS-E-SVM_2025-BVES-001.pdf," p. 18.
[166] Data Request OEIS-E-SVM_2025-BVES-001, question 41; attachment "Data Request OEIS-E-SVM_2025-BVES-001.pdf," p. 18.
[167] Bear Valley Electric Service, 2023-2025 Base Wildfire Mitigation Plan, Published November 16, 2023, p. 197, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).
[168] Data Request OEIS-E-SVM_2025-BVES-001, question 2; attachment "2. Training Sign in Sheet.pdf."

Finding- 8.2.7 Workforce Planning

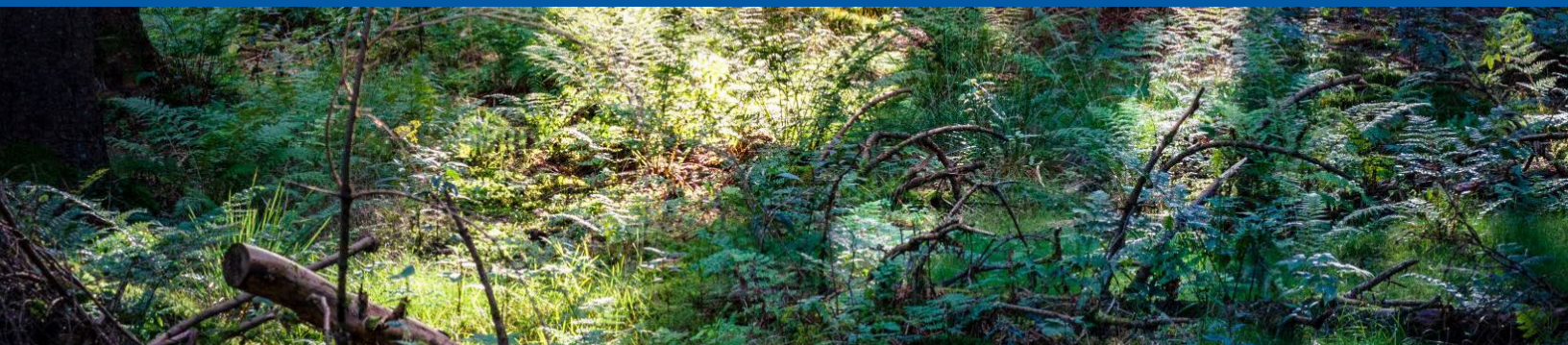
BVES did not provide information consistent with the completion of all work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.7 Workforce Planning is deficient. Energy Safety's audit of BVES's 2023 vegetation management work also identified that BVES's vegetation management staff was not ISA certified. In its CAP response to Energy Safety's 2023 SVM Audit, BVES stated:

> BVES has determined that the requirement it had imposed in Table 8-20 for contracted Tree Trim General Foreman/Supervisors and Tree Trimmer positions be ISA certified was overly burdensome, not required, and not realistic. Therefore, BVES has since deemed that it is not necessary for these positions to hold this certification. BVES has removed ISA certification from being required for Tree Trim and General Foreman/Supervisor and contracted Tree Trimmer…[169]

In its CAP response to Energy Safety's 2024 WMP vegetation management audit, BVES must provide its revised qualifications for its contracted Tree Trim General Foreman/Supervisor and Tree Trimmer positions and discuss how BVES determined that the revised qualifications were necessary for the positions and could be attained by BVES's available resources.

[169] Bear Valley Electric Service, 2023 SVM Audit CAP, published April 2, 2025, p. 3, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).

APPENDIX 2. Bear Valley Electric Service Inc. 2024 Corrective Action Plan



APPENDIX DESCRIPTION

BVES submitted its CAP to Energy Safety on December 5, 2025. This appendix reproduces that CAP response in its entirety.

Bear Valley Electric Service, Inc.
P.O. Box 1547
Big Bear Lake, CA 92315-1547
A Subsidiary of American States Water Company

December 5, 2025

VIA E-MAIL

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Bear Valley Electric Service, Inc 2024 SVM Audit Corrective Actions Plan

Dear Director Thomas Jacobs:

In compliance with the Office of Energy Infrastructure Safety's ("OEIS" or "Energy Safety") Substantial Vegetation Management ("SVM") audit findings sent to Bear Valley Electric Service, Inc. ("BVES" or "Bear Valley") on October 24, 2025, Bear Valley submits this SVM Audit Response and Corrective Action Plan. As of the date of this corrective action letter, Bear Valley notes that it has not experienced a vegetation caused outage in over 20 months, which is quite significant given the high density of vegetation in Bear Valley's service area.

Findings and Corrective Actions

Initiative Number:	8.2.2.3 UAV HD Photography/ Videography Inspection
Findings:	BVES did not provide information consistent with the completion of work identified in initiative 8.2.2 Vegetation Management Inspections. Therefore, Energy Safety concludes that initiative 8.2.2 Vegetation Management Inspections is deficient.

Statement: "The documentation BVES provided only demonstrated UAV inspections were conducted within the areas immediately surrounding pole locations. While the documentation demonstrated that all poles in its service area were inspected with UAV, it did not demonstrate that all of its conductor line miles were inspected. Because BVES stated that the UAV technology had limited capability to detect vegetation compliance issues along the conductors between primary poles, BVES did not demonstrate that UAV inspections were completed along 205 circuit miles."

Response: As part of this UAV inspection, photos are taken at each pole, looking down the line. Each location and photo set provide visibility of the conductors between the poles. However, there are inherent limitations when inspectors review these images. Depth perception in photographs can make it challenging to determine the exact position of vegetation in relation to the conductors.

BVES has explored alternatives to reduce these limitations, including capturing mid-span photos and videos of the entire line, but these methods did not provide any additional benefit for inspectors. BVES does not believe additional changes to the UAV inspection is needed because BVES considers this inspection to be complimentary to other inspections regularly performed. BVES conducts multiple regular inspections including LiDAR inspection, two ground patrols, satellite imagery, and detailed inspections. These combined methods performed each year ensure wide-ranging visibility and assessment of the system.

Initiative Number:	8.2.2.5 3rd Party Ground Patrol Inspection
Findings:	Energy Safety has identified potential areas of improvement in BVES's record keeping of its annual 3rd Party Ground Patrol inspections. BVES needs to provide a CAP response that outlines any corrective actions that were identified in the meeting.

Corrective Action: During a recent meeting between BVES and OEIS's Energy Safety, BVES proposed a solution to improve the record keeping process for the inspection. In 2026, BVES will add span-lengths information to the inspection database where inspectors document their findings. This additional data will confirm that inspections are completed from pole to conductor to pole, addressing Energy Safety's concerns with the 3rd Party Ground Patrol recordkeeping.

Initiative Number:	8.2.3.1 Pole Clearing
Findings:	Energy Safety could not verify that BVES met or exceeded PRC 4292 requirements as stated in its 2023-2025 WMP. In its CAP response to Energy Safety's 2024 WMP vegetation management audit, BVES must provide an update on its progress implementing these corrective actions.

Corrective Action: BVES has developed a plan to comply with PRC 4292 that will go in effect in 2026. Under this plan, all poles located in the State Resource Area that have not been replaced since 2016 to receive annual pole-brushing work until all equipment on the pole has been replaced. This approach

ensures that BVES is in compliance with PRC 4292. BVES will document all pole-brushing activities within the BVES enterprise system, Intelligent Vegetation Management System ("IVMS").

Initiative Number:	8.2.3.2 Vegetation and Fuels Management- Wood and Slash Management
Findings:	BVES provided information consistent with the completion of work identified in initiative 8.2.3.2 Wood and Slash Management. However, in its CAP, BVES must include updates detailing its progress in implementing and using the enhanced capabilities of its new enterprise system.

Corrective Action: BVES has agreed that wood and slash management data will be documented in BVES's enterprise system IVMS. As of July, 2025, all vegetation management work orders require crews to document what actions were completed related to wood and slash management.

Initiative Number:	8.2.3.3 Clearance
Findings:	In its CAP, BVES must explain the methodology it used to determine the number of circuit miles that were cleared as part of its VM_9 target in 2024.

Corrective Action: Each quarter, BVES calculates the circuit miles cleared for VM_9 after the all of the primary lines within the grid have been inspected and vegetation crews have completed all clearance work on the lines. Subsequently, BVES selects all of the grids that were completed and creates a geodatabase that totals up all of the circuit miles completed.

The total circuit miles determined from the grid count are used in BVES's Quarterly Data Reports ("QDR") for VM_9, and as part of the QDR spatial data to Energy Safety.

Initiative Number:	8.2.3.6 High-Risk Species
Findings:	BVES provided information consistent with the completion of work identified in this target. However, BVES must submit a CAP that addresses the forester's recommendation to more aggressively remove problematic vegetation.

Corrective Action: BVES has made significant efforts to remove high-risk species throughout the service territory. For example, BVES removed more than double the initiative target for the year in 2024 and is

currently dedicating 30% of all vegetation management resources to removing high-risk species and dead and dying trees. BVES has seen numerous improvements in the condition of vegetation surrounding the electrical system as reflected in its reliability metrics and will continue to dedicate resources to removing problematic vegetation – mostly high-risk species and dead, and dying trees – as feasible, without allowing other removal activities and other initiatives to fall behind.

Initiative Number:	8.2.5 Quality Assurance and Quality Control
Findings:	In Its CAP, BVES must either provide the updated Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs procedural document or a status update of when the revised version will be published.

Corrective Action: BVES is currently revising the document "Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs". BVES will provide Energy Safety the document no later than December 30, 2025.

Initiative Number:	8.2.6 Open Work Orders
Findings:	In its CAP response to Energy Safety's 2024 WMP vegetation management audit, BVES must provide an update on its progress implementing these corrective actions, as well as any lessons learned or adjustments made in 2025 to ensure vegetation compliance discrepancies are addressed within the timeframes specified in its 2023–2025 WMP. Additionally, Energy Safety expects BVES to assign a priority level to all vegetation management work orders. Doing so will ensure transparency, allow for proper tracking, and confirm that resolution timeframes are met to minimize risk on BVES's system.

Statement: Energy Safety identified significant delays between the time vegetation hazards were identified during LiDAR inspections and when those hazards were remediated. BVES stated that its contractor provided LiDAR data to BVES which identified vegetation hazards on August 8, 2024.[105] However, it took BVES between 11 and 13 days to field-verify Level 1 priority hazards and create the work orders. While the work orders were then completed within 1 day, these hazards were present in BVES's system for an average of 12 days between receipt of LiDAR data and work order assignment. For Level 2 priority hazards, BVES took between 11 and 116 days (an average of 73 days) to field verify and assign a work order for remediation.[106] This delayed response does not

demonstrate that BVES took immediate action for Level 1 priority hazards identified by LiDAR inspection or addressed Level 2 priority hazards identified by LiDAR inspection within the required 30-day timeframe.

Corrective Action: BVES has made substantial progress in addressing open work orders from inspection programs. Once inspection results are provided to BVES, all vegetation management resources are assigned to begin corrective action immediately. In 2024, it took BVES nearly 116 days to address all level 1 and level 2 findings. In 2025, BVES was able to inspect and correct all findings in under 39 days from the date that BVES received the data. BVES aims to continue to improve this timeframe in the future by addressing all findings in under 30 days from the receipt of the data.

In the 2023 SVM CAP, BVES stated "As corrective action to this issue, BVES is requiring the LiDAR contractor to provide LiDAR findings as soon as the analysis for each individual circuit is completed instead of waiting until all of the complete survey analysis of the entire BVES overhead system is finished. Additionally, BVES is requesting the contractor notify it immediately of any Level 1 findings.". However, with the advancements in LiDAR technology, the data is being processed at much faster speeds. The previous action plan of receiving the data by circuit when available is no longer a viable plan. The contractor is now able to process all of BVES LiDAR data in one batch. As part of BVES 2024 SVM CAP, BVES is going to update the "Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs" document to create realistic timeframes for addressing open work orders from inspection programs that generate large volumes of data at one time. The updates will be as followed: A level 1 possible finding will have 14 days to be inspected and once the finding is confirmed, BVES will have 24 hours to correct the encroachment. A level 2 possible finding will have 30 days to be inspected and once a finding is confirmed, BVES will have 30 days to correct the encroachment. With these revised timeframes, BVES will be able to stay compliant after receiving large data sets of possible encroachments.

Initiative Number:	8.2.7 Workforce Planning
Findings:	In its CAP response to Energy Safety's 2024 WMP vegetation management audit, BVES must provide its revised qualifications for its contracted Tree Trim General Foreman/Supervisor and Tree Trimmer positions and discuss how BVES determined that the revised qualifications were necessary for the positions and could be attained by BVES's available resources.

Statement 8: BVES stated in their 2023-2025 WMP, Table 8-20 that contracted Tree Trim and General Foreman/Supervisor and contracted Tree Trimmer would have ISA certification. In statement 12, OEIS identified that these contracted vegetation management employees did not hold an ISA certification.

Corrective Action: BVES revised the qualification for the positions of contracted Tree Trim General Foreman/Supervisor and Tree Trimmer positions for the 2026-2028 WMP. See table below of updated qualifications. BVES determined that it is not necessary for these positions to hold the certification of ISA certified forester. BVES does have a contracted ISA certified forester that assists vegetation crews when needed.

Worker Title	**Minimum Qualifications for Target Role**	**Applicable Certifications**
Tree Trim General Foreman/Supervisor (Contractor)	5 years of line clearance tree pruning experience in a Foreman role Line clearance Certification Current California Driver License General Computer knowledge	Line-clearance qualified tree-trimmer
Tree Trim Groundman	One year of arboriculture experience or degree in relevant field	Strong work ethic Current California Driver License (Class B permit) General computer skills

Conclusion

Bear Valley keenly understands the importance of vegetation management around powerlines and appreciates Energy Safety's efforts to help improve wildfire safety for utilities. By executing a thorough annual vegetation management inspection program that consists of LiDAR surveys, UAV photography surveys, two patrol inspections, GO-165 detailed inspection, and satellite surveys; a highly effective vegetation clearance program, and 100% post clearance inspections, Bear Valley has significantly reduced the risk of vegetation caused ignitions. Bear Valley has not experienced a vegetation contact outage in 20 months and has not experienced an ignition of any type in over 20 years. This is achieved by continuously improving vegetation management programs and never compromising standards. Therefore, BVES appreciates Energy Safety's detailed review and comments to further promote process improvements.

Respectfully Submitted,

Paul Marconi
President, Treasurer & Secretary

P.O. Box 1547, 42020 Garstin Drive, Big Bear Lake, California 92315
Tel: (909) 866-4678 Fax: (909) 866-5056

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715 P Street, 15th Floor
Sacramento, CA 95814
916.902.6000