

DATA REQUEST RESPONSE
Bear Valley Electric Service, Inc.

Response provided by: Paul Marconi
Title: President, Treasurer and Secretary
Data Request Number: Semcer Email February 18, 2022
Date Received: February 18, 2022
Date Due: March 4, 2022
Date Provided: March 4, 2022

Background. Energy Safety is in the process of evaluating the cost impacts of three regulations that Energy Safety plans to adopt. As part of that effort, we are asking certain electrical corporations, including BVES, to determine the cost impacts those regulations would have on their respective companies. Attached please find the proposed text of these regulations:

- § 29200. Submission of Confidential Information
- § 29300. Notification
- § 29301. Incident Reporting

We are grateful for BVES's assistance with this important work and request BVES's responses by March 4.

Following are notes regarding the work we are requesting with respect to each regulation.

§ 29300. Notification -

The notification regulation would impose essentially three notification requirements. We anticipate that events noted on BVES's monitoring systems might provide BVES with notice of information that triggers these notification requirements. Please note that the cost impacts are seeking are those related to providing information to Energy Safety, not costs related to monitoring events on the electrical system. Please provide the costs for each of the following notification timelines:

- a) A process for notifying Energy Safety within one business day if a fault, outage, or other anomaly occurs on infrastructure located within one mile of either the origin or perimeter of a fire requiring a response from a fire suppression agency, whichever is known and closest, and it occurred within six hours before the fire suppression agency arrived at the fire.

Response
Cost estimate is \$53.

- b) A process for notifying Energy Safety within 24 hours of knowing or having reason to know that a fire requiring a response from a fire suppression agency may contact infrastructure that the entity owns or operates, or is within 10 miles of, and moving toward, that infrastructure.**

Response

Cost estimate is \$53.

- c) A process for notifying Energy Safety within four hours after the regulated entity knows or has reason to know that either infrastructure owned or operated by the regulated entity might have started a fire, or a government entity is investigating whether infrastructure owned or operated by the regulated entity caused a fire.**

Response

Cost estimate is \$53.

§ 29301. Incident Reports

The incident report regulation would require electrical corporations to report certain information about certain fires. The components of the report are listed below, and we ask that you provide the cost information for each individual component rather than a single cost estimate for the entire report.

- (1) Documents that contain information included in the incident report.**

Response

Cost estimate is \$265.

- (2) The name, contact information, and job title of each person with knowledge of BVES's response to the fire and investigation into the cause of the fire.**

Response

Cost estimate is \$159.

- (3) A root cause analysis of the event or equipment malfunction which BVES believes might potentially have been involved with starting the fire. For #3 provide assumptions on number of days to complete the root cause analysis, number of full time employees per day working on it, and average salary per employee.**

Response

BVES estimates 80 hours (5 days) between two fulltime employees. Average salary \$76,000. Burden rate used in estimate is 45%. Total cost estimate is \$4,238.

(4) A description of all actions taken to prevent the recurrence of similar incidents.

Response

Cost estimate is \$1,272.

(5) The name and contact information of each person with possession of any physical evidence removed from the site of the fire.

Response

Cost estimate is \$265.

(6) A list of all documents that contain information relating to the regulated entity's response to the fire or investigation into the cause of the fire.

Response

Cost estimate is \$424.

§ 29200. Submission of Confidential Information

This regulation will apply when a company submits information to Energy Safety that the company maintains is exempt from disclosure to members of the public. We ask that, to the extent there are cost impacts, BVES's account for these requirements in its analysis.

The cost of:

(1) Identifying the information claimed to be exempt from disclosure;

Response

Cost estimate is \$3,015.

(2) Segregating the information to the extent reasonably possible;

Response

Cost estimate is \$3,015.

(3) Providing both redacted and unredacted versions of documents that contain the information;

Response

Cost estimate is \$3,015.

(4) Identifying the statutory basis for the exemption or exemptions claimed; and

Response

Cost estimate is \$2,803.

(5) Stating the reasons why each exemption claimed applies to the information

Response

Cost estimate is \$2,803.

When the submitter claims that the information is exempt from disclosure because the information contains trade secrets or because disclosure would cause a loss of a competitive advantage. These additional requirements apply:

(1) Identify the competitive advantage;

Response

Cost estimate is \$2,803.

(2) State how the advantage would be lost through disclosure;

Response

Cost estimate is \$2,803.

(3) State the value of the information to the submitter;

Response

Cost estimate is \$3,015.

(4) Describe the ease or difficulty with which others could legitimately acquire or duplicate the information.

Response

Cost estimate is \$2,803.