



August 26, 2022

To: Bear Valley
Paul Marconi
President
42020 Garstin Dr.
Big Bear Lake, CA 92315

SUBJECT: Office of Energy Infrastructure Safety’s Audit on BVES’s Substantial Vegetation Management Work in 2020.

Pursuant to the requirements of California Public Utilities Code Section 8386.3(c)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) under the California Natural Resource Agency (CNRA) has completed and enclosed the results of its audit of BVES’s substantial vegetation management work in 2020.

During the audit, Energy Safety reviewed data provided by BVES, which Energy Safety compared to the representations BVES made in its 2020 Wildfire Mitigation Plan (WMP). The enclosed audit specifies areas where BVES failed to fully comply with the vegetation management requirements in its wildfire mitigation plan. BVES is permitted 30 days from the date of this transmission to correct and eliminate any deficiency specified in the audit. Subsequently, Energy Safety will issue a final report.

Please submit by electronic copy the requested Substantial Vegetation Management Audit Response & Corrective Action Plan no later than 30 days from the issuance of this letter to the [2020-SVM docket](#) in Energy Safety’s e-filing system with a file named “BVES 2020 SVM Audit Corrective Action Plan.”

Thank you for your courtesy and cooperation throughout the audit process. If you have any questions concerning this audit, please contact Edward Chavez at Edward.Chavez@energysafety.ca.gov, with a copy to compliance@energysafety.ca.gov.

Sincerely,

Koko Tomassian
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
California Natural Resource Agency

Cc:

Edward Chavez, Energy Safety

Gary Candelas, Energy Safety

Attachment: Audit



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY'S
2020 SUBSTANTIAL VEGETATION
MANAGEMENT AUDIT**
Bear Valley Electric Service Inc.

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1.0 EXECUTIVE SUMMARY

The statute requires electrical corporations (utilities) to notify Energy Safety after completing substantial portions of vegetation management requirements in their approved Wildfire Mitigation Plans (WMPs) and requires Energy Safety to audit compliance with these requirements.¹ Energy Safety refers to this audit as the “Substantial Vegetation Management” (SVM) audit.

To conduct this audit, Energy Safety evaluated the vegetation management section of Bear Valley Electric Services Inc.’s (BVES) 2020 WMP.² The 2020 WMP Guidelines contained 20 initiatives in the vegetation management section. In reviewing the vegetation management section and initiatives in BVES’s 2020 WMP, Energy Safety identified both quantitative commitments (e.g., miles of lines to inspect, minimum work quality thresholds, etc.) and verifiable statements (e.g., the utility will hold public meetings with communities regarding future vegetation management activities, the utilities will train personnel on utility protocols, etc.) made by BVES. Energy Safety then reviewed available information and requested additional documentation to support the assessment of whether utilities met their quantitative commitments and executed their verifiable statements.

Based on the scope above and subsequent analysis, Energy Safety found BVES not compliant with three out of the 20 vegetation initiatives audited in its 2020 WMP, as detailed in Table 1 below.

Table 1: Energy Safety's Analysis of BVES's 2020 WMP Vegetation Management Initiatives

2020 WMP Initiative Number	2020 WMP Initiative Name	Determination ³
5.3.5.1	Additional Efforts to Manage Community and Environmental Impacts	Compliant
5.3.5.2	Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment	Non-compliant
5.3.5.3	Detailed Inspections of Vegetation Around Transmission Electric Lines and Equipment	Not Applicable
5.3.5.4	Emergency Response Vegetation Management Due to Red Flag Warning or Other Urgent Conditions	Not Applicable

¹ Cal. Pub. Util. Code § 8386.3, subd. (c)(5)(A)

² 2020 WMP guidelines, R.18-10-007 p.78, the 2020 WMP had 10 categories such as asset management and inspections, vegetation management and inspections, data governance, etc.

³ As used in this context, “Compliant” means the utility was able to provide Energy Safety document(s) to support statements made in its 2020 WMP. “Non-compliant” means the utility was not able to provide Energy Safety document(s) to support commitments and statements made in its 2020 WMP. Energy Safety’s analysis did not assess the quality of how said WMP statement was executed. “Not applicable” means Energy Safety cannot conduct an analysis for this initiative. Energy Safety’s analysis did not assess the quality of how said WMP statement was executed.

2020 WMP Initiative Number	2020 WMP Initiative Name	Determination ³
5.3.5.5	Fuel management and reduction of “slash” from vegetation management activities	Compliant
5.3.5.6	Improvement of Inspections	Compliant
5.3.5.7	LiDAR Inspection of Vegetation Around Distribution Electric Lines and Equipment	Compliant
5.3.5.8	LiDAR Inspection of Vegetation Around Transmission Electric Lines and Equipment	Not Applicable
5.3.5.9	Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment Beyond Inspections Mandate by Rules and Regulations	Not Applicable
5.3.5.10	Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment Beyond Inspections Mandate by Rules and Regulations	Not Applicable
5.3.5.11	Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment	Compliant
5.3.5.12	Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment	Not Applicable
5.3.5.13	Quality Assurance/ Quality Control of Inspections	Compliant
5.3.5.14	Recruiting and Training of Vegetation Management Personnel	Non-compliant
5.3.5.15	Remediation of At-Risk Species	Compliant
5.3.5.16	Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment	Compliant
5.3.5.17	Substation Inspections	Compliant
5.3.5.18	Substation Vegetation Management	Compliant
5.3.5.19	Vegetation Inventory System	Compliant
5.3.5.20	Vegetation Management to Achieve Clearance Around Electric Lines and Equipment	Non-compliant

The 2020 WMP was the first year these SVM audit requirements were in effect. As with any inaugural process or effort, there was no existing precedent. Lessons learned in the execution of this audit will be carried over into future WMP guidelines and compliance operations. Energy Safety looks forward to further refining and developing these SVM audits as the program matures.

2.0 PURPOSE

A utility must notify Energy Safety when it completes a substantial portion of the vegetation management requirements in its WMP on an annual basis.⁴ Energy Safety is then required to audit the utility's vegetation management work and specify any failure of the utility to comply with the vegetation management requirements in its WMP.⁵

Energy Safety conducted this audit based on the statutory language as described below.

Pursuant to the California Public Utilities Code section 8386.3(c)(5)(A):

An electrical corporation shall notify the Wildfire Safety Division,⁶ within one month after it completes a substantial portion of the vegetation management requirements in its wildfire mitigation plan of completion. Upon receiving the notice from the electrical corporation, the division shall, consistent with its authority pursuant to paragraph (1) of subdivision (a) of section 326, promptly audit the work performed by, or on behalf of, the electrical corporation. The audit shall specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the wildfire mitigation plan. The division shall provide the audit to the electrical corporation. The electrical corporation shall have a reasonable time, as determined by the division, to correct and eliminate any deficiency specified in the audit.

3.0 SCOPE OF THE SUBSTANTIAL VEGETATION MANAGEMENT AUDIT

To conduct this audit, Energy Safety evaluated the vegetation management section of BVES's 2020 WMP.⁷ The 2020 WMP guidelines contained 20 initiatives in the vegetation management section. In reviewing the vegetation management section and initiatives in BVES's 2020 WMP, Energy Safety identified both quantitative commitments (e.g., miles of lines to inspect, minimum work quality thresholds, etc.) and verifiable statements (e.g., the utility will hold public meetings with communities regarding future vegetation management activities, the

⁴ Cal. Pub. Util. Code § 8386.3, subd. (c)(5)(A)

⁵ Cal. Pub. Util. Code § 8386.3, subd. 8386.3(c)(5)(A)

⁶ Wildfire Safety Division shall be referred to as Office of Energy Infrastructure Safety

⁷ 2020 WMP guidelines, R.18-10-007 p.78, the 2020 WMP had 10 categories such as asset management and inspections, vegetation management and inspections, data governance, etc.

utilities will train personnel on utility protocols, etc.) made by BVES. Energy Safety then reviewed available information and requested additional documentation to support the assessment of whether BVES met its quantitative commitments and executed its verifiable statements.

BVES notified Energy Safety upon completing a substantial portion of its 2020 WMP vegetation management requirements. In support of its audit, Energy Safety requested documentation to verify BVES compliance with verifiable statements and quantifiable commitments in the vegetation management sections of its 2020 WMP. This audit did not assess the quality of how BVES vegetation management programs were executed beyond BVES's own self-assessments of work quality.

4.0 BACKGROUND

On April 30, 2021,⁸ BVES notified Energy Safety that it had completed a substantial portion of the vegetation management requirements in its 2020 WMP. The 2020 WMP Guidelines identify a total of 20 vegetation management initiatives for utilities to describe in their WMPs. The vegetation management section of BVES's 2020 WMP was formatted and structured differently than those of other utilities. The first variance is that BVES reported all its vegetation management activities under a single initiative: 5.3.5 Vegetation Management and Inspection. In addition, BVES provided a general narrative description of its overall vegetation management program and then listed details relative to the 20 vegetation management initiatives in the WMP Guidelines into a single table (Table 25),⁹ with a distinct row for each initiative. Finally, much of the information in Table 25 directs readers to other tables (i.e., Table 24 and Table 26) in the WMP. The rows in Table 25 with details contain few quantifiable or qualifiable statements.

To proceed with the audit while accounting for the nonstandard structure of BVES's 2020 WMP vegetation management section, Energy Safety modified its audit approach as follows. Energy Safety took statements made in the overall vegetation management section (5.3.5) and placed them into the initiative activities that best fit the 20 vegetation management initiatives in the 2020 WMP Guidelines. For this reason, the structure of this SVM audit is slightly different than those of other utilities. BVES's single vegetation management program covers all but two of the vegetation management initiative activities listed in the 2020 WMP Guidelines. These initiative activities include Light Detection and Ranging (LiDAR) and patrol inspections, which are discussed in other WMP sections.

⁸ Letters of Notification of Substantial Compliance (SB-247) from Zhu Zeng, Rate Analyst, Regulatory Affairs Bear Valley Electric Service, Inc., to the Director of WSD dated April 30, 2021

⁹ Table 25 page 161

4.1 WMP 2020 Vegetation Management Initiatives

In its 2020 WMP Table 25, BVES identified 20 vegetation management initiatives, as listed below.

1. Additional efforts to manage community and environmental impacts
2. Detailed inspections of vegetation around distribution electric lines and equipment
3. Detailed inspections of vegetation around transmission electric lines and equipment
4. Emergency response vegetation management due to red flag warning or other urgent conditions
5. Fuel management and reduction of “slash” from vegetation management activities
6. Improvement of inspections
7. LiDAR inspections of vegetation around distribution electric lines and equipment
8. LiDAR inspections of vegetation around transmission electric lines and equipment
9. Other discretionary inspection of vegetation around distribution electric lines and equipment, beyond inspections mandated by rules and regulations
10. Other discretionary inspection of vegetation around transmission electric lines and equipment, beyond inspections mandated by rules and regulations
11. Patrol inspections of vegetation around distribution electric lines and equipment
12. Patrol inspections of vegetation around transmission electric lines and equipment
13. Quality assurance/quality control of inspections
14. Recruiting and training of vegetation management personnel
15. Remediation of at-risk species
16. Removal and remediation of trees with strike potential to electric lines and equipment
17. Substation inspections
18. Substation vegetation management
19. Vegetation inventory system
20. Vegetation management to achieve clearances around electric lines and equipment

4.2 Documents Reviewed

In performing this audit, Energy Safety reviewed the following records and documents:

1. BVES’s 2020 Wildfire Mitigation Plan
2. BVES December 7th, 2020, Meeting takeaway files
3. BVES response to Energy Safety’s data request DR-019
4. BVES response to Energy Safety’s data request DR-041
5. BVES response to Energy Safety’s data request DR-100
6. BVES response to Energy Safety’s data request DR-106

7. Email Correspondence regarding DR-100 question 2

Below, in Table 2, is a timeline of events that outline Energy Safety’s communication with BVES pertaining to this SVM audit. Communication below includes data requests, as listed above, and BVES’s subsequent responses.

Table 2: Timeline of Events BVES's Communication with Energy Safety Regarding SVM Audit

Number	Date(s)	Event
1	April 30, 2021	BVES submitted to Energy Safety Notification of Completion of 2020 Vegetation Requirements
2	May 20, 2021	Energy Safety submitted data request DR-019 regarding 5.3.5.2,5.3.5.5,5.3.5.9,5.3.5.11,5.3.5.16
3	June 9, 2021	BVES submitted its response to DR-019 to Energy Safety.
4	October 22, 2021	Energy Safety submitted data request DR-041 regarding 5.3.5.9,5.3.5.11,5.3.5.13,5.3.5.18
5	November 15, 2021	BVES submitted its response to DR-041.
6	December 7, 2021	Energy Safety had a meeting with BVES to discuss BVES response to DR-041
7	June 6, 2022	Energy Safety had a meeting with BVES to review DR-100
8	June 6, 2022	Energy Safety submitted data request DR-100 regarding 5.3.5, 5.3.5.1,5.3.5.2,5.3.5.5,5.3.5.6,5.3.5.7,5.3.5.11,5.3.5.13,5.3.5.15,5.3.5.16,5.3.5.17,5.3.5.18,5.3.5.18,5.3.5.19,5.3.5.20
9	June 17, 2022	BVES submitted a response to DR-100 to Energy Safety
10	June 30, 2022	Energy Safety submitted data request DR-106 regarding 5.3.5,5.3.5.7,5.3.5.11
11	July 6, 2022	BVES submitted a response to DR-106 to Energy Safety
12	August 8, 2020	Energy Safety requested additional information regarding 5.3.5.1 by email
13	August 9, 2020	BVES response to email related to 5.3.5.1

5.0 ANALYSIS OF BVES VEGETATION MANAGEMENT INITIATIVES

This section contains an initiative-by-initiative analysis of all vegetation management initiatives in BVES’s 2020 WMP. Within each subsection, verifiable statements, supporting information,

and Energy Safety analysis are provided for each initiative, followed by a summary of Energy Safety’s disposition on utility compliance.

5.1 Initiative 5.3.5.1 Additional Efforts to Manage Community and Environmental Impacts

The purpose of this initiative is to describe the utility’s “strategy to mitigate negative impacts from utility vegetation management to local communities and the environment.”¹⁰

5.1.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In Table 25 of its 2020 WMP, BVES states, “BVES Valley Electric Service does not have a specific wildfire mitigation and inspection initiative dedicated to this effort at this time. The utility recognizes that additional efforts to manage community and environmental impacts are critical to reducing wildfire risk and conducts such efforts on an as-needed basis, as well as incorporating additional efforts within other programs such as those in Table 29 and Table 30.”¹¹ Table 29 is found under the initiative Emergency Planning and Preparedness. In Table 29, row 2, initiative Community Outreach, Public Awareness, and Communication Efforts, BVES states, “N/A-this is a system-wide initiative.”¹² Energy Safety reviewed the overall initiative of BVES’s 2020 WMP Emergency Planning and Preparedness, which stated, “The goal of customer outreach is to educate and prepare customers for fire prevention, proactive de-energization and other utility infrastructure related emergencies.”¹³

To assess compliance with these statements, Energy Safety reviewed BVES’s response to DR-100 regarding customer outreach. BVES’s primary means of outreach to the community is through social media. The response to DR-100 included multiple samples of Facebook posts BVES posted throughout 2020. These posts covered a myriad of topics, including updates on BVES’ wildfire mitigation efforts, public safety power shutoff (PSPS) events, and fire safety.¹⁴ The information posted varied from notice of a townhall meeting to discuss BVES wildfire mitigation efforts to informing customers of a Southern California Edison PSPS event as well as discussing general fire safety practices. Regarding its table values stating “N/A-this is a system-wide initiative,” BVES explains that due to the small size of its service territory, a majority of community outreach efforts cover system-wide initiatives.¹⁵ Following the evaluation of BVES’s communications notifying and educating the public regarding wildfire mitigation, PSPS, and fire

¹⁰ 2020 WMP guidelines, R.18-10-007, page 78

¹¹ 2020 WMP Table 25 row 1, page 161

¹² 2020 WMP Table 29, page 197

¹³ 2020 WMP, page 192

¹⁴ BVES response to DR-100

¹⁵ BVES response to DR-100, question 14

safety, Energy Safety finds that BVES was able to produce information consistent with the above statements made in its 2020 WMP for this initiative.

BVES Table 25 of its 2020 WMP, directs readers to Table 30.¹⁶ The table did not have any quantifiable or qualifiable statements regarding to vegetatoin. Energy Safety reviewed category 5.3.10 Stakeholder Cooperation and Community Engagement of BVES’s 2020 WMP, which contained Table 30 which states, “Going forward, BVES will... provide additional outreach in prevalent languages... post...vegetation management...in English, Spanish, French, Tagalog, Vietnamese, and Chinese on BVES’s Website.”¹⁷ Energy Safety reviewed BVES’s website, which includes information regarding vegetation management efforts in all languages mentioned in its 2020 WMP. Following the review of BVES’s website and confirmation that vegetation management information is available in all languages mentioned in BVES 2020 WMP, Energy Safety finds that BVES was able to provide information consistent with the above statement made in its 2020 WMP for this initiative.

In its 2020 WMP, in category 5.3.5 Vegetation Management and Inspection, BVES states, “The utility created the vegetation management plan with wildfire prevention in mind, collaborating with the City of Big Bear Lake, Local Fire Departments, and the US Forest Service on an as-needed basis.”¹⁸ In support of this statement, BVES provided the dates and times that it held meetings with government officials listed above regarding vegetation management. BVES held two vegetation management related meetings in January and August of 2020. In addition, BVES conducted a third meeting to discuss PSPS policy with government agencies in September 2020.¹⁹ BVES provided screenshots of the BVES Outlook calendar showing both meetings took place in January and August of 2020.²⁰ Following the evaluation of BVES’s response showing multiple meetings held with government officials, Energy Safety finds that BVES was able to provide information consistent with the above statement made in its 2020 WMP for this initiative.

5.1.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.1

Based on Energy Safety’s analysis, Energy Safety finds BVES compliant with its 2020 WMP initiative 5.3.5.1: additional efforts to manage community and environmental impacts.

5.2 Initiative 5.3.5.2 Detailed Inspection of Vegetation Around Distribution Electric Lines and Equipment

¹⁶ 2020 WMP, Table 25 row 1, page 161

¹⁷ 2020 WMP, page 203

¹⁸ 2020 WMP, page 158

¹⁹ BVES response to DR-100, question 2

²⁰ 2020 SVM follow-up to question 2 of DR-100

The purpose of this initiative is to describe the utility's visual inspections of tree conditions within the utility's distribution right-of-way (ROW).²¹

5.2.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, "N/A-this is a system-wide initiative."²² BVES also notes the following: "Increase vegetation clearances, criteria for tree removals, and eliminates overhang on sub-transmission."²³ Energy Safety reviewed BVES's response to DR-100 regarding the above statements. BVES stated a system-wide initiative means "to include all aspects of the service territory including primary lines, secondary lines, substations, and all BVES facilities."²⁴ In regard to increased vegetation clearances, Energy Safety reviewed BVES's contract with Mowbray's Tree Service. In the contract, BVES stipulates that increased vegetation clearances should be done depending on the characteristics of the vegetation species (i.e., growth rates).²⁵ The contract also stipulates "contractors will trim beyond 12 feet if necessary to ensure that the vegetation remains outside the minimum 72-inch safe clearance distance for the entire length of the vegetation management program cycle (3-year)."²⁶

Energy Safety reviewed a sample quality control form, which ask if "vegetation [is] encroaching within 6'/72" of uninsulated primary conductors."²⁷ In regards to criteria for tree removals, BVES states, "The consideration of removal of fast-growing trees and all vegetation within the drip line of primary conductors that has the potential of growing into the secondary system or within 12 feet of the energized primary conductors within the 3-year vegetation management program cycle will be removed."²⁸ In regard to eliminating overhang, the contract states, "No vertical coverage shall be allowed above BVES sub-transmission lines (34.5kV)."²⁹ To substantiate tree removals and overhang, Energy Safety reviewed vegetation records regarding mitigation done in BVES's territory. Excel file "2020 Vegetation Record.xlsx"³⁰ contained the grid ID, species, cycle, quantity, trim style, (i.e., side trim, top, removal, service drop, slop), and date of completion. The record showed 9,075³¹ trees received some type of mitigation (removal, trim, service drop clearance). Energy Safety also reviewed inspection records of seven of the thirteen substations that required vegetation management.³² The inspection records contain the date, station name, inspector name, and the findings. In a sample substation

²¹ 2020 WMP guidelines, R.18-10-007, page78

²² 2020 WMP, Table 25 row 2, page 161

²³ 2020 WMP, Table 25 row 2 under column titled "Comments", page 161

²⁴ BVES Response to Energy Safety DR-100, question 17

²⁵ Mowbray's contract, page 6

²⁶ Mowbray's contract, page 7

²⁷ BVES response to DR-100, QC of Veg Work

²⁸ Mowbray's contract, page 7

²⁹ Mowbray's contract, page 7

³⁰ BVES response to DR-019, question 1

³¹ "2020 vegetation Records.xlsx"; sum of column E "Quantity"

³² BVES response to DR-019, question 4

inspection report done on November 3, 2020, the prescription prescribed was for weed abatement.

Following the evaluation of BVES's response showing increased vegetation clearance, tree removals, and elimination of overhang, Energy Safety finds that BVES was able to produce information consistent with the above statements made in its 2020 WMP for this initiative.

In its 2020 WMP, under category 5.3.5 Vegetation Management and Inspection, BVES states, "BVES has a vegetation management plan in place."³³ In BVES's response to DR-100 regarding this statement, BVES states, "BVES created its first formal internal policies and procedures in April 2021. Before the creation of the internal policies and procedures, BVES and its contractors referred to the vegetation management contract."³⁴ BVES's response, stating that a formal internal policy and procedure was put into place in April 2021 contradicts its WMP statement, which stated it had a vegetation management plan in place for 2020. Energy Safety finds that BVES was unable to produce information consistent with the above statement made in its 2020 WMP for this initiative.

BVES continues, "The goal of this plan is to proactively maintain vegetation, so it does not come into contact with electrical infrastructure, thereby preventing wildfire."³⁵ Energy Safety reviewed vegetation records regarding mitigation done in BVES territory. Excel file "2020 Vegetation Record.xlsx"³⁶ contained records showing 9,075³⁷ trees received some type of mitigation (removal, trim, service drop clearance). Following the evaluation of BVES's response that shows proactive pruning was done to prohibit trees from contacting electrical conductors, Energy Safety finds that BVES was able to produce information consistent with the above statement made in its 2020 WMP for this initiative.

In its 2020 WMP, under category 5.3.5 Vegetation Management and Inspection, BVES states, "The program includes three components: preventative vegetation management, corrective vegetation clearance, and emergency vegetation clearance."³⁸ Energy Safety reviewed BVES's response to DR-100 regarding this statement. The three components were listed in BVES's contract with Mowbray's Tree Service. The Preventative Vegetation Management stipulates vegetation will be trimmed per clearance specifications on a 3-years cycle.³⁹ Energy Safety reviewed "2020 Vegetation Record.xlsx," which contains the records of the trim date along with the cycle (i.e., 1, 2, 3) the trim was completed in. Corrective Vegetation Clearance pertains to corrective and emergent vegetation orders that aim to correct vegetation clearance discrepancies.⁴⁰ Following the December 7th, 2020, meeting discussing BVES response to DR-041, BVES provided 33 emergent vegetation violation communication emails between BVES and

³³ 2020 WMP, page 158

³⁴ BVES response to DR-100, question 100

³⁵ 2020 WMP, page 158

³⁶ BVES response to DR-019, question 1

³⁷ "2020 vegetation Records.xlsx"; sum of column E "Quantity"

³⁸ 2020 WMP, page 158

³⁹ Mowbray's contract, page 5

⁴⁰ Mowbray's contract, page 5

contractors that needed corrective action.⁴¹ In regards to Emergency Vegetation Clearance, contractors shall work extended hours, weekends, and holidays as needed to clear lines as directed by BVES representatives.⁴² BVES provided a sample emergency vegetation clearance log that details work completed on five trees and the total hours worked following a storm on October 26, 2020.⁴³ As BVES provided evidence that all three programs took place in 2020, Energy Safety finds BVES was able to produce information consistent with the above statement made in its 2020 WMP for this initiative.

In its 2020 WMP, under category 5.3.5 Vegetation Management and Inspection, BVES states, “All vegetation management work must adhere to certain specifications, as outlined by BVES. The utility-defined specifications comply with or exceed those outlined in General Order Appendix E Guidelines to Rule 35.”⁴⁴ Energy Safety reviewed BVES’s contract with Mowbray’s Tree Service. The contract stipulates the contractor shall trim in accordance with Appendix E Guidelines to Rule 35 of General Order-95 (GO).⁴⁵ Energy Safety also reviewed a sample QC form, which verifies that the audited tree was trimmed in accordance with statutory standards.⁴⁶ Following the evaluation of BVES’s contract with the contractor, Energy Safety finds BVES was able to produce information consistent with the above statement made in its 2020 WMP for this initiative.

In its 2020 WMP, under category 5.3.5 Vegetation Management and Inspection, BVES states:

As previously described BVES has unique local conditions that require it, in certain circumstances, to go beyond the regulated vegetation clearance standards. These enhanced specifications include:

- A minimum radial clearance of 72 inches between bare conductors and vegetation. (BVES’s bare conductors operate between 2.4 kV or more volts, but less than 72 kV, which means it must have a minimum radial clearance of 48 inches.)
- No vertical coverage above BVES sub-transmission lines (34.5 kV).
- All vegetation within the drip line of primary conductors that has the potential of growing into the secondary system or within 12 feet of the energized primary conductors within the 3-year vegetation management program cycle will be removed.
- Dead, rotten or diseased trees or portions of otherwise healthy trees – also known as ‘hazard trees’ – that overhang or lean toward and may fall into a span of power lines will be removed. Note that this may apply to trees outside the clearance zone.

⁴¹ Patrol Requests.pdf

⁴² Mowbray’s Contract, page 6

⁴³ BVES response to DR-102, question 1

⁴⁴ 2020 WMP, page 159

⁴⁵ Mowbray’s contract, page 5

⁴⁶ BVES response to DR-100, QC of Veg Work

- Exceptions for tree trunks or major limbs that meet the following criteria: at the primary conductor level, mature tree trunks that are greater than 18 inches in diameter and major limbs that are greater than 10 inches in diameter with sufficient strength and rigidity may encroach within the minimum safe distance (72-inches) but not within 18 inches of the bare line conductors. The rigidity of the tree trunk or major limb must be such that it would be impossible for it to encroach within 12 inches of the bare conductor at any time during high wind, heavy icing and snow, or other conditions.⁴⁷

To verify the first bullet point above, Energy Safety reviewed BVES's contract with Mowbray's Tree Services and a sample quality control report. The contract stipulates that "contractors will trim beyond 12 feet if necessary to ensure that the vegetation remains outside the minimum 72-inch safe clearance distance for the entire length of the vegetation management program cycle (3-year)."⁴⁸ The sample quality control report asks the auditor is vegetation "...encroaching within 6'/72" of uninsulated primary conductors."⁴⁹ The auditor then marks if the vegetation as pass/fail. Regarding the second and third bullet points, Energy Safety reviewed the Excel file "2020 Vegetation Record.xlsx" which provided the grid-ID that contained BVES's sub-transmission lines (34.5kV) and trim style.⁵⁰ Multiple trees were prescribed a "side trim," which removes all foliage on the side of the tree facing the conductor. The file also indicated whether a tree was trimmed or removed in regard to drop lines.⁵¹ Regarding the fourth bullet point, Energy Safety reviewed the Excel file "TreeRemovalRecord[sic].xlsx," which contained the record of all trees removed in 2020. The support of its assertion in the last bullet point, in 2020, BVES sent Energy Safety spatial data on the geographical location of all major woody stems in BVES service territory. Following the evaluation of BVES's tree contract, quality control form, and vegetation records, Energy Safety finds BVES was able to provide information consistent with its 2020 WMP statements for this initiative.

In its 2020 WMP, under category 5.3.5 Vegetation Management and Inspection, BVES states, BVES's contractor currently conducts vegetation maintenance on the system."⁵² Energy Safety reviewed BVES's response to DR-100, which provided a 2020 invoice from a BVES contractor that conducted vegetation maintenance. The invoice contained information pertaining to the equipment used, grid-ID, date of inspection, total trees inspected, and mitigation type.⁵³ Following the evaluation of BVES's invoice regarding vegetation maintenance, Energy Safety finds BVES was able to provide information consistent with its 2020 WMP statement for this initiative.

⁴⁷ 2020 WMP, page 159

⁴⁸ Mowbray's contract, page 7

⁴⁹ BVES response to DR-100, QC of Veg Work

⁵⁰ "2020 Vegetation Record.xlsx"; column B and G

⁵¹ "2020 Vegetation Record.xlsx"; column G

⁵² 2020 WMP, page 159

⁵³ BVES response to DR-100, question 7

In its 2020 WMP, under category 5.3.5 Vegetation Management and Inspection, BVES states, “The contractor also provides weekly updates, which include the status of work completed and upcoming work such as tree removals, special support requests, corrective and emergent vegetation order status, and other items pertinent to progress of the work.”⁵⁴ Energy Safety reviewed BVES’s response to DR-100, which supplied email correspondence with the tree contractor. Emails pertained to the work status of a Poplar tree removal and corrective and emergent work on vegetation clearance from a customer request.⁵⁵ Following the evaluation of BVES’s correspondence emails detailing work regarding tree removal, special support requests, and corrective emergent vegetation order status, Energy Safety finds BVES was able to provide information consistent with its 2020 WMP statement for this initiative.

5.2.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.2

Based on Energy Safety’s analysis, Energy Safety finds BVES non-compliant with its 2020 WMP initiative 5.3.5.2: Detailed inspections of vegetation around distribution electric lines and equipment.

5.3 Initiative 5.3.5.3 Detailed Inspection of Vegetation Around Transmission Electric Lines and Equipment

The purpose of this initiative is to describe the utility’s visual inspections of tree conditions within the utility’s transmission ROW.⁵⁶

5.3.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, “Bear Valley Electric Service does not have any transmission lines or equipment as all of BVES’s lines are below 65kv.”⁵⁷ Therefore, Energy Safety did not conduct an analysis of this initiative.

5.3.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.3

Based on the information above, Energy Safety did not conduct an analysis of this initiative.

⁵⁴ 2020 WMP, page 159

⁵⁵ DR-100, response to question 10

⁵⁶ 2020 WMP guidelines, R.18-10-007, page 78

⁵⁷ 2020 WMP, Table 25 row 3, page 162

5.4 Initiative 5.3.5.4 Emergency Response Vegetation Management Due to Red Flag Warning or Other Urgent Conditions

The purpose of this initiative is to describe the utility's vegetation management efforts in advance of weather conditions that increase ignition probability and wildfire consequences.⁵⁸

5.4.1 2020 WMP initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, "Bear Valley Electric Service does not have a specific wildfire mitigation vegetation management and inspection initiative dedicated to this effort at this time."⁵⁹ Therefore, Energy Safety did not conduct an analysis of this initiative.

5.4.2 Energy Safety's Determination for 2020 WMP Initiative 5.3.5.4

Based on the information above, Energy Safety did not conduct an analysis of this initiative.

5.5 Initiative 5.3.5.5 Fuels Management and Reduction of "Slash" from Vegetation Management Activities

The purpose of this initiative is to describe the utility's efforts to reduce "the availability of fuel in proximity to potential sources of ignition, including 'slash' from vegetation."⁶⁰

5.5.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, "BVES Valley Electric Service does not have a specific Wildfire mitigation vegetation management and inspection initiative dedicated to this effort at this time. Fuel management and reduction of "slash" from vegetation management activities have been incorporated in BVES's ongoing and newly proposed vegetation management initiatives as described in Table 25."⁶¹ While there is no specific mention of "slash" in any other initiatives in Table 25. Energy Safety requested information on BVES's "slash" protocols. BVES provided the contract executed with its contractor. It states, "Contractor...shall be responsible

⁵⁸ 2020 WMP guidelines, R.18-10-007, page 78

⁵⁹ 2020 WMP, Table 25 row 4, page 162

⁶⁰ 2020 WMP guidelines, R.18-10-007, page 78

⁶¹ 2020 WMP, Table 25 row 5, page 163

for removing and disposing of all wood and wood products and any other wastes generated by requested services and work on a daily basis as the work progress.”⁶² The contract continues in the direction of brush piles, debris near streams, and wood product waste disposed in accordance with applicable federal, state, and county rules and regulations.⁶³ Though BVES did not have a specific initiative for “slash,” it was able to produce information consistent with the subject of “slash” removal. Energy Safety finds BVES was able to produce information consistent with the above statements made in its 2020 WMP for this initiative.

5.5.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.5

Based on Energy Safety’s analysis, Energy Safety finds BVES compliant with its 2020 WMP initiative 5.3.5.5: Fuels Management and Reduction of “slash” from Vegetation Management Activities

5.6 Initiative 5.3.5.6 Improvement of Inspections

The purpose of this initiative is to describe the utility’s efforts to improve “inspection protocols and implementation of training and the evaluation of inspectors.”⁶⁴

5.6.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, “Program incorporated new requirements in 2019.”⁶⁵ In BVES’s response to DR-100 regarding new program requirements, BVES stated that it implemented a LiDAR inspection of its system and a 3rd party patrol inspection of its system in addition to the patrol inspection BVES performs each year.⁶⁶ Energy Safety reviewed excel file “LiDarData.xlsx,” which contained data from LiDAR inspection conducted in 2020. It provided information on the clearance level of vegetation from conductors, latitude and longitude of vegetation, and voltage of conductors.⁶⁷ BVES also provided excel file “3rd Party Patrol.xlsx,” which contained the results of the 3rd party patrol. These included pole number, latitude and longitude, vegetation issues, pole assets issues, and date of inspection. Following the evaluation of both excel files showing LiDAR inspections and 3rd party inspections carried out, Energy Safety finds BVES was able to provide information consistent with the above statements made in its 2020 WMP for this initiative.

⁶² Mowbrays contract, page 10

⁶³ Mowbrays contract, page 11

⁶⁴ 2020 WMP guidelines, R.18-10-007, page 79

⁶⁵ 2020 WMP, Table 25 row 6 column titled “comment”, page 163

⁶⁶ BVES response to DR-100, question 19b

⁶⁷ “LiDar Data.xlsx”

5.6.2 Energy Safety's Determination for 2020 WMP Initiative 5.3.5.6

Based on Energy Safety's analysis, Energy Safety finds BVES compliant with its 2020 WMP initiative 5.3.5.6: Improvement of Inspections

5.7 Initiative 5.3.5.7: LiDAR Inspections of Vegetation Around Distribution Electric Lines and Equipment

The purpose of this initiative is to describe the utility's Light Detection and Ranging (LiDAR) inspection program for distribution ROW.⁶⁸

5.7.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES directs readers to "Table 24 Initiative 7."⁶⁹ Table 24 Initiative 7: LiDAR inspections of distribution electric lines and equipment states that BVES has conducted LiDAR inspections on "632.43"⁷⁰ line miles. In response to DR-100, BVES provided the contract with its LiDAR vendor. The contract requires the vendor to conduct LiDAR "inspections of the entire BVES overhead... [which is composed of] approximately 211 linear circuit miles⁷¹ specifically focused on detecting and documenting the radial distance of vegetation from bare conductor power lines."⁷² BVES also provided the invoice of payment given to the contractor for the completion of its LiDAR analysis in 2020.⁷³ Following the evaluation of both the contractor and the invoice of payment, Energy Safety finds BVES was able to provide information consistent with the above statements made in its 2020 WMP for this initiative.

5.7.2 Energy Safety's Determination for 2020 WMP Initiative 5.3.5.7

Based on Energy Safety's analysis, Energy Safety finds BVES compliant with its 2020 WMP initiative 5.3.5.7: LiDAR Inspection of Vegetation Around Distribution Electric Lines and Equipment

⁶⁸ 2020 WMP guidelines, R.18-10-007, page 79

⁶⁹ 2020 WMP, Table 25 row 7, page 164

⁷⁰ 2020 WMP, Table 24 row 7 under column "Lines Miles to Be Treated", page 153

⁷¹ BVES response to DR-106 question 3, defines circuit miles as distance from pole to pole regardless of how many conductors are on each pole. Line miles are defined as pole to pole multiplied by the numbers of conductors in the line segment. Energy Safety converted the 211 linear circuit miles by multiplying by a factor of 3 to substantiate 632.43-line miles.

⁷² BVES response to DR-100, question 20

⁷³ 4.LiDAR invoices.pdf

5.8 Initiative 5.3.5.8 LiDAR Inspections of Vegetation Around Transmission Electric Lines and Equipment

The purpose of this initiative is to describe the utility's Light Detection and Ranging (LiDAR) inspection program on transmission ROW.⁷⁴

5.8.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, "Bear Valley Electric Service does not have any transmission lines or equipment as all of BVES's lines are below 65kv."⁷⁵ Therefore, Energy Safety did not conduct an analysis of this initiative.

5.8.2 Energy Safety's Determination for 2020 WMP Initiative 5.3.5.8

Based on the information above, Energy Safety did not conduct an analysis of this initiative.

5.9 Initiative 5.3.5.9 Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations

The purpose of this initiative is to describe the utility's discretionary vegetation inspection program(s) of distribution Right of Way (ROW) and the adjacent vegetation that may be hazardous, which goes beyond the minimum requirements in rules and regulations.⁷⁶

5.9.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, "Bear Valley Electric Service does not have any other discretionary inspections of vegetation around distribution electric lines and equipment beyond inspections mandated by rules and regulations and other described initiatives at this time."⁷⁷ Therefore, Energy Safety did not conduct an analysis of this initiative.

⁷⁴ 2020 WMP guidelines, R.18-10-007, page 79

⁷⁵ 2020 WMP, Table 25 row 8, page 164

⁷⁶ 2020 WMP guidelines, R.18-10-007, page 79

⁷⁷ 2020 WMP, Table 25 row 9, page 165

5.9.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.9

Based on the information above, Energy Safety did not conduct an analysis of this initiative.

5.10 Initiative 5.3.5.10 Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandate by Rules and Regulations

The purpose of this initiative is to describe the utility’s discretionary vegetation inspection program(s) of transmission ROW and the adjacent vegetation that may be hazardous, which goes beyond the minimum standards in rules and regulations.⁷⁸

5.10.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, “Bear Valley Electric Service does not have any transmission lines or equipment as all of BVES’s lines are below 65kv.”⁷⁹ Therefore, Energy Safety did not conduct an analysis of this initiative.

5.10.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.9

Based on the information above, Energy Safety did not conduct an analysis of this initiative.

5.11 Initiative 5.3.5.11 Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment

The purpose of this initiative is to describe the utility’s distribution right-of-way inspection program to identify “obvious [vegetation] hazards.”⁸⁰

5.11.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

⁷⁸ 2020 WMP guidelines, R.18-10-007, page 79

⁷⁹ 2020 WMP, Table 25 row 10, page 165

⁸⁰ 2020 WMP guidelines, R.18-10-007, page 79

In its 2020 WMP Table 25, BVES directs readers to “Table 24 Initiative 11.”⁸¹ Table 24 Initiative 11: Patrol inspections of distribution electric lines and equipment states that BVES has conducted LiDAR inspections on “632.43”⁸² line miles. BVES provided Excel files “2020 Patrol inspections.xlsx” and “3rd Party Patrol.xlsx.” The first file provided a table detailing completed patrol inspections of circuits within BVES territory. The file contained the circuit name with corresponding voltage, circuit miles (for the corresponding circuit name), and the quarter the circuit was completed. Energy Safety calculated that 211.07⁸³ circuit miles were completed. The latter Excel file contained information regarding the findings of the patrols. The file contained information regarding pole identification, assets, and vegetation status associated with a specific pole. Following the evaluation of the Excel files showing 211.07 circuit miles⁸⁴ were completed and the patrol findings, Energy Safety finds BVES was able to produce information consistent with the above statement made in its 2020 WMP for this initiative.

5.11.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.11

Based on Energy Safety’s analysis, Energy Safety finds BVES compliant with its 2020 WMP initiative 5.3.5.11: Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment

5.12 Initiative 5.3.5.12 Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment

The purpose of this initiative is to describe the utility’s transmission right-of-way inspection program to identify “obvious [vegetation] hazards.”⁸⁵

5.12.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, “Bear Valley Electric Service does not have any transmission lines or equipment as all of BVES’s lines are below 65kv.”⁸⁶ Therefore, Energy Safety did not conduct an analysis of this initiative.

⁸¹ 2020 WMP, Table 25 row 11, page 164

⁸² 2020 WMP, Table 24 row 11 under column “Line Miles to Be Treated”, page 153

⁸³ “21.2020 Patrol inspections.xlsx”; sum of Q1, Q2, Q3 and Q4 columns

⁸⁴ BVES response to DR-106 question 3, defines circuit miles as distance from pole to pole regardless of how many conductors are on each pole. Line miles are defined as pole to pole multiplied by the numbers of conductors in the line segment. Energy Safety converted the 211 linear circuit miles by multiplying by a factor of 3 to substantiate 632.43-line miles

⁸⁵ 2020 WMP guidelines, R.18-10-007, page 79

⁸⁶ 2020 WMP, Table 25 row 12, page 166

5.12.2 Energy Safety's Determination for 2020 WMP Initiative 5.3.5.12

Based on the information above, Energy Safety did not conduct an analysis of this initiative.

5.13 Initiative 5.3.5.13 Quality Assurance/Quality Control of Inspections

The purpose of this initiative is to describe the utility's program to audit completed vegetation work "to manage and confirm work completed by employee or subcontractors, including packaging QA/QC information for input to decision-making and related integrated workforce management process."⁸⁷

5.13.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP, under category 5.3.5 Vegetation Management and Inspection, BVES states, "To ensure quality, BVES staff (managers, supervisors, and other trained staff) conduct Quality Control (QC) checks of the contractor's work through detailed, routine inspections and patrols of its overhead circuits."⁸⁸ Energy Safety reviewed BVES's response to data requests regarding these statements. BVES stated, "In 2020, vegetation management QCs were directed verbally and assigned in Kintone. Kintone is BVES's internal record-keeping system for QCs. Staff who perform vegetation management (VM) QCs are able to see their assigned VM QC, the due date, and the status of the QC."⁸⁹ BVES provided a copy of its Kintone in Excel file "2020 Kintone Records.xlsx," which contains the dates of the inspection, location, and inspector name.⁹⁰ BVES also provided a QC sample report conducted in 2020. The QC tree trimming report contained the total number of trees inspected and the pass rate based on the questionnaire answered by the auditor.⁹¹ BVES conducted 30 VM quality checks in 2020.⁹² Following the evaluation of BVES response showing QC inspection of tree mitigation, Energy Safety finds BVES was able to produce information consistent with the above statements made in its 2020 WMP for this initiative.

5.13.2 Energy Safety's Determination for 2020 WMP Initiative 5.3.5.13

Based on Energy Safety's analysis, Energy Safety finds BVES compliant with its 2020 WMP initiative 5.3.5.13: Quality Assurance/Quality Control of Inspections

⁸⁷ 2020 WMP guidelines, R.18-10-007, page79

⁸⁸ 2020 WMP, page 159

⁸⁹ BVES response to DR-100, response to question 22

⁹⁰ December 7th, 2020, takeaway files

⁹¹ BVES response to DR-100, QC of Veg Work

⁹² BVES response to DR-041, question 3

5.14 Initiative 5.3.5.14 Recruiting and Training of Vegetation Management Personnel

The purpose of this initiative is to describe the utility’s program to “identify and hire qualified vegetation management personnel” and to ensure they are “adequately trained to perform vegetation management work, according to the utility’s wildfire mitigation plan, in addition to rules and regulations for safety.”⁹³

5.14.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 Table 25, BVES states that BVES, “[will] place a full-time contract utility forester as part of the BVES team.”⁹⁴ Energy Safety inquired about the start date of the utility forester. BVES stated the start date was March 15, 2021.⁹⁵ BVES provided the contract for the utility forester, which outlines the scope of work and states the forester “shall be the primary lead on documenting the results and status of the vegetation management program as well as the providing data analysis and recommendation to identify trends or other useful insights to help better manage and improve the program.”⁹⁶ BVES hiring of the utility forester beyond 2020 in which the WMP statement was written. Following the evaluation of BVES’s response stating the hiring date was passed the year of 2020, Energy Safety finds BVES was not able to produce information consistent with the above statement made in its 2020 WMP for this initiative.

5.14.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.14

Based on Energy Safety’s analysis, Energy Safety finds BVES non-compliant with its 2020 WMP initiative 5.3.5.14: Recruiting and Training of Vegetation Management Personnel.

5.15 Initiative 5.3.5.15 Remediation of At-Risk Species

The purpose of this initiative is to describe the utility’s “action to reduce ignition probability and wildfire consequences attributable to at-risk vegetation species...”⁹⁷

⁹³ 2020 WMP guidelines, R.18-10-007, page 79

⁹⁴ 2020 WMP, Table 25 row 14, page 167

⁹⁵ BVES response to DR-100, question

⁹⁶ BVES response to DR-100, question 27

⁹⁷ 2020 WMP guidelines, R.18-10-007, page 79

5.15.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES directs readers to “Table 25 and particularly, Table 24 Item 14.”⁹⁸ However, Energy Safety’s review of Table 25 and Table 24 item 14 showed BVES did not specifically detail remediation of at-risk species. Therefore, Energy Safety could not conduct an analysis of this initiative.

5.15.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.15

Based on the information above, Energy Safety did not conduct an analysis of this initiative.

5.16 Initiative 5.3.5.16 Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment

The purpose of this initiative is to describe the utility’s “actions to remediate trees that could potentially strike electrical equipment if failure at the ground-level of the tree or branch breakout within the canopy.”⁹⁹

5.16.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In the 2020 WMP, category 5.3.5 Vegetation Management and Inspection, BVES states, “BVES will also 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.”¹⁰⁰ BVES provided the tree contractor contract, which stipulates, “All fast-growing trees, (poplar, aspen, cottonwood...) will be trimmed to at least 12 feet, and removal will be considered.”¹⁰¹ The contract also stipulates that the contractor remove trees that are dead, rotten or diseased or leaning toward power lines.¹⁰² BVES provided excel file “TreeRemovalRecords.xlsx[sic],”¹⁰³ which contained the records of trees removed in BVES’s territory. These records included address, species, quantity removed, and dates removed. BVES removed 225¹⁰⁴ trees. Following the evaluation of BVES’s response showing BVES has a

⁹⁸ 2020 WMP, Table 25 row 15, page 170

⁹⁹ 2020 WMP guidelines, R.18-10-007, page 79

¹⁰⁰ 2020 WMP, page 159

¹⁰¹ Mowbray’s contract, page 7

¹⁰² Mowbray’s contract, page 7

¹⁰³ BVES response to DR-019, question 5

¹⁰⁴ “TreeRemovalRecord.xlsx”; sum of column D “quantity”

protocol in place for remediation of at-risk species and records showing trees removed, Energy Safety finds BVES was able to produce information consistent with the above statements made in its 2020 WMP for this initiative.

In its 2020 WMP, under category 5.3.5 Vegetation Management and Inspection, BVES states, “When executing tree removals, BVES and its contractors comply with permitting requirements mandated by the US Forest Service, County of San Bernardino, or city of Big Bear Lake as applicable.”¹⁰⁵ In its contract with Mowbray’s Tree Service, BVES stipulates that the contractor shall obtain permits that are required by the city, local, state, federal, and other government agencies to perform tree removal.¹⁰⁶ In response to DR-100, BVES stated, “BVES did not conduct any removals that required a permit in 2020.”¹⁰⁷ Following the evaluation of BVES’s contract with the contractor requiring permit acquisition for tree removals subjected to permitting requirements, Energy Safety finds BVES was able to produce information consistent with the above statement, even though BVES stated no tree removals required permits in its 2020 WMP for this initiative.

5.16.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.16

Based on Energy Safety’s analysis, Energy Safety finds BVES compliant with its 2020 WMP initiative 5.3.5.16: Removal and Remediation of Trees with Strike Potential of Electrical Lines and Equipment.

5.17 Initiative 5.3.5.17 Substation Inspections

The purpose of this initiative is to describe the utility’s “inspection of vegetation surrounding substations.”¹⁰⁸

5.17.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, “Substation vegetation management is a subset to the company’s vegetation initiatives as described in Table 25.”¹⁰⁹ Therefore, Energy Safety did not conduct a separate analysis for compliance with this initiative. Energy Safety’s assessment of this initiative is subsumed within its assessment of 2020 WMP initiatives 5.3.5.2.

5.17.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.17

¹⁰⁵ 2020 WMP, page 159

¹⁰⁶ Mowbray’s contract, page 10

¹⁰⁷ BVES response to DR-100, question 11

¹⁰⁸ 2020 WMP guidelines, R.18-10-007, page 79

¹⁰⁹ 2020 WMP, Table 25 row 17, page 171

See Energy Safety’s determination for initiatives 5.3.5.2.

5.18 Initiative 5.3.5.18 Substation Vegetation Management

The purpose of this initiative is to describe the utility’s “actions taken to reduce the ignition probability and wildfire consequences attributable to contact from vegetation to substation equipment.”¹¹⁰

5.18.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, “Substation vegetation management is a subset to the company’s vegetation initiatives as described in Table 25 Initiatives 2 and 14.”¹¹¹ Therefore, Energy Safety did not conduct a separate analysis for compliance with this initiative. Energy Safety’s assessment of this initiative is subsumed within its assessment of 2020 WMP initiatives 5.3.5.2.

5.18.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.17

See Energy Safety’s determination for initiatives 5.3.5.2.

5.19 Initiative 5.3.5.19 Vegetation Inventory System

The purpose of this initiative is to describe the utility’s efforts toward having a “centralized inventory of vegetation clearances” that includes species, growth forecast, and grow-in, blow-in, or fall-in risk.¹¹²

5.19.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, “Bear Valley Electric Service does not have a specific wildfire mitigation initiative dedicated to the creation and management of a vegetation inventory system at this time. The company’s utility forester, as described in Table 25 item 14, will maintain such a system.”¹¹³ Therefore, Energy Safety did not conduct a separate analysis

¹¹⁰ 2020 WMP guidelines, R.18-10-007, page 80

¹¹¹ 2020 WMP, Table 25 row 18, page 171

¹¹² 2020 WMP guidelines, R.18-10-007, page 80

¹¹³ 2020 WMP, Table 25 row 19, page 172

for compliance with this initiative. Energy Safety’s assessment of this initiative is subsumed within its assessment of 2020 WMP initiatives 5.3.5.14

5.19.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.19

See Energy Safety’s determination for initiatives 5.3.5.14.

5.20 Initiative 5.3.5.20 Vegetation Management to Achieve Clearances around Electric Lines and Equipment

The purpose of this initiative is to describe the utility’s “actions taken to ensure that vegetation does not encroach upon the minimum clearances in GO 95.”¹¹⁴

5.20.1 2020 WMP Initiative Statements, Supporting Information, and Analysis

In its 2020 WMP Table 25, BVES states, “Vegetation management to achieve clearances around electric lines and equipment is captured in Table 25 Items 2 and 14.”¹¹⁵ Therefore, Energy Safety did not conduct a separate analysis for compliance with this initiative. Energy Safety’s assessment of this initiative is subsumed within its assessment of 2020 WMP initiatives 5.3.5.2 and 5.3.5.14.

5.20.2 Energy Safety’s Determination for 2020 WMP Initiative 5.3.5.20

See Energy Safety’s determination for initiatives 5.3.5.2 and 5.3.5.14

6.0 CORRECTIVE ACTIONS

Energy Safety reviewed all 20 initiatives pertaining to vegetation management in BVES’s 2020 WMP. Energy Safety’s audit found BVES non-compliant with three of the 20 vegetation management initiatives in its 2020 WMP. In these instances of noncompliance, Energy Safety’s audit found that BVES was unable to provide supporting documentation or information consistent with statements made in its 2020 WMP regarding its vegetation management initiatives.

This audit is not an assessment of the quality of BVES’s execution of its vegetation management programs.

¹¹⁴ 2020 WMP guidelines, R.18-10-007, page 80

¹¹⁵ 2020 WMP, Table 25 row 20, page 173

See Table 3 below for a summary of Energy Safety’s findings and corrective actions for BVES pertaining to this audit. Within 30 days following receipt of this audit, BVES must submit a response to the Corrective Actions listed in Table 3 below, as well as supporting documentation. BVES must title its response “BVES 2020 SVM Audit Corrective Action Plan” and submit the response on the 2020 SVM Docket in Energy Safety’s E-Filing System.

Corrective Actions

Table 3: Findings from Energy Safety’s 2020 SVM audit of BVES

Non-compliant Initiative Number	Finding	Corrective Action
5.3.5.2 ¹¹⁶	1. BVES failed to have an internal plan for its vegetation management programs prior to contracting out to contractors.	BVES shall a) provide the steps it is taking or has taken to ensure it has an internal vegetation management plan, and b) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in this initiative of the WMP.
5.3.5.14	2. BVES failed to hire a contractor utility forester in 2020.	BVES shall a) explain the reason why the contractor was not hired in 2020, and b) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in this initiative of the WMP.

¹¹⁶ Non-compliant of 5.3.5.20 is included in this finding

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