



August 8, 2023

Paul Marconi
President, Treasurer and Secretary
Bear Valley Electric Service, Inc.
P.O. Box 9028
San Dimas, CA 91773-9028

SUBJECT: Office of Energy Infrastructure Safety Issuance of Revision Notice for Bear Valley Electric Service Company's 2023-2025 Wildfire Mitigation Plan

Dear Mr. Marconi:

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Revision Notice for Bear Valley Electric Service Company's (BVES's) 2023-2025 Wildfire Mitigation Plan (Base WMP). This Revision Notice indicates that Energy Safety has identified critical issues associated with BVES's Base WMP. Critical issues are areas of significant concern that may lead to the denial of a WMP if associated remedies are not satisfactorily addressed by the utility. For each identified critical issue, Energy Safety sets forth the remedy that BVES must address.

A Revision Notice Response must be submitted by BVES within 15 days of issuance of this Revision Notice (no later than August 23, 2023). BVES must provide:

- A response to each critical issue.
- A revised version of its Base Plan, submitted to the 2023-2025 Wildfire Mitigation Plan docket (#2023-2025-WMPs), that includes any changes to the Base Plan resulting from its Revision Notice Response, in both a redlined and a clean version of the document.
- Any auxiliary spreadsheets required as part of the Base Plan submission that incorporate all required changes across all critical issues.

Public comments

Stakeholders may submit comments on BVES's Revision Notice Response within 15 days after the publication of BVES's Revision Notice Response on the 2023-2025 Wildfire Mitigation Plan docket. Reply comments are due 10 calendar days thereafter and must be limited to issues raised and representations made in opening comments of other stakeholders. As such,

opening comments must be submitted no later than September 7, 2023. Reply comments must be submitted no later than September 17, 2023.¹

The Revision Notice Response and public comments must be submitted to the 2023 Wildfire Mitigation Plans docket (#2023-2025-WMPs) via Energy Safety’s e-filing system.² Submitted files must use the naming conventions provided in the 2023 Guidelines.³ For example, “2023-08-29_BVES_23_RNR_R1,” refers to the Bear Valley Electric Service Revision Notice Response submitted on August 29, 2023, revision 1. The redlined version must be named “2023-08-29_BVES_23_R1_redlined” and the auxiliary excel file “2023-08-29_BVES_23_RNR_R1_Tables x-x.”

Schedule

The dates relevant to this Revision Notice are:

Revision Notice issued by Energy Safety	August 8
BVES Revision Notice Response due	August 23
Opening comments due	September 7
Reply comments due	September 17
Draft Decision issued by Energy Safety	no later than September 25

Energy Safety will consider BVES’s Revision Notice Response, its revised Base Plan, stakeholder comments, responses to data requests, and the totality of the information before it to date in issuing a determination on BVES’s Base Plan pursuant to Public Utilities Code sections 8386(b) and 8386.3(a).

Sincerely,

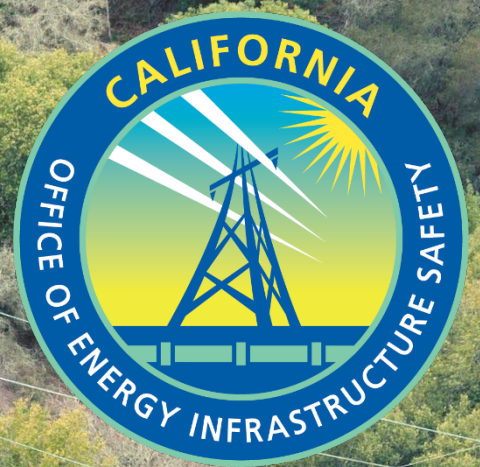


Lucy Morgans
Program Manager | Electric Safety Policy Division
Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

¹ Dates falling on a Saturday, Sunday, or holiday as defined in Government Code section 6700 have been adjusted to the next business day in accordance with Government Code section 6707.

² Submit comments to [2023 to 2025 Electrical Corporation Wildfire Mitigation Plans docket \(2023-2025-WMPs\)](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs) (https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs, accessed July 24, 2023).

³ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true), Section 10.6, page 19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed June 14, 2023).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
REVISION NOTICE FOR BEAR VALLEY
ELECTRIC SERVICE'S
2023-2025 WILDFIRE MITIGATION PLAN

August 2023

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1. Introduction

Before approval of an electrical corporation's Wildfire Mitigation Plan (WMP), the Office of Energy Infrastructure Safety (Energy Safety) may require modification of the WMP.¹ Energy Safety effectuates this by issuing a Revision Notice.

This Revision Notice identifies critical issues in Bear Valley Electric Service's (BVES's) 2023-2025 Wildfire Mitigation Plan (Base Plan or WMP). Critical issues are defined as areas of significant concern that may lead to the denial of a WMP if associated remedies are not satisfactorily addressed by the utility.² BVES must address the critical issues set forth in this Revision Notice according to the parameters set forth herein. Section 4 provides submission instructions and deadlines.

¹ [Public Utilities Code section 8386](#)

(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8386.&lawCode=PUC, accessed May 30, 2023).

² In this document "utility" should be understood to mean "electrical corporation."

2. Summary of Critical Issues

Where a utility fails to sufficiently address a required element of the WMP as prescribed by Public Utilities Code section 8386, a requirement detailed in Energy Safety's Technical Guidelines³ and the Data Guidelines,⁴ or a specific area for continued improvement outlined in a previous plan approval, it can constitute a critical issue. This section outlines the two critical issues associated with BVES's Base Plan.⁵ The issues are listed below by mitigation initiative.

Section 4 provides a more detailed explanation of each critical issue and sets out specific remedies. BVES must demonstrate that it has fully addressed and responded to each remedy in its Revision Notice Response within the specified 15-day timeframe. Failure to respond and fully address Revision Notice remedies within the specified timeframe may result in denial of BVES's Base Plan.

For purposes of BVES's responses and Energy Safety's continued evaluation, the issues are assigned tracking codes.

Public Safety Power Shutoffs (PSPS)

- **RN-BVES-23-01:** BVES is missing the completion date for the final objective in Section 9.1.3 Table 9-3.
- **RN-BVES-23-02:** PSPS targets are unsupported by BVES's WMP narrative, PSPS projections, and past PSPS usage.

³ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>, accessed May 5, 2023).

⁴ [Energy Safety's Data Guidelines Version 3.1 \(March 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true>, accessed May 16, 2023).

⁵ [Bear Valley Electric Service 2023-2025 Wildfire Mitigation Plan 2023 Revision 0](#) (posted to the 2023-2025-WMPs docket June 7, 2023)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=54026&shareable=true>, accessed July 24, 2023).

3. Critical Issues and Required Remedies

3.1 Public Safety Power Shutoffs

3.1.1 **RN-BVES-23-01: BVES is missing the completion date for the final objective in Section 9.1.3 Table 9-3**

The 2023-2025 WMP Technical Guidelines, Section 9.1.3, requires each objective to include a completion date for when the utility will achieve the objective. BVES's WMP⁶ does not provide a completion date for its objective, "continue to conduct comprehensive outreach to identify households with AFN persons [persons with access and functional needs]."

In response to a data request,⁷ BVES stated this information was inadvertently left blank. Energy Safety expects BVES to revise its WMP with the corrected information.

3.1.1.1 Required Remedies

BVES must provide a completion date for the "continue to conduct comprehensive outreach to identify households with AFN persons" objective in its list of three-year PSPS objectives (Table 9-3).

3.1.2 **RN-BVES-23-02: PSPS targets are unsupported by its WMP narrative, PSPS projections, and past PSPS usage**

The 2023-2025 WMP Technical Guidelines, Section 9.1.4, requires the utility to provide targets that track progress and inform efforts to reduce the scope, scale, and frequency of PSPS events. While BVES's PSPS targets indicate BVES plans for a decrease in PSPS events, they are incongruous with representations made in the WMP narrative, quarterly PSPS projections, and its historical use of PSPS.

In its WMP, BVES provided targets for number of PSPS events, number of customers impacted by PSPS, and number of circuits de-energized by PSPS.⁸

⁶ BVES's 2023-2025 WMP, Table 9-3 "PSPS Objective [sic] (3-year plan)," pages 365-368.

⁷ Data Request [OEIS-P-WMP_2023-BVES-001](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=54206&shareable=true) (Question 1) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=54206&shareable=true, accessed July 10, 2023).

⁸ BVES's 2023-2025 WMP, Table 9-5 "PSPS Targets," pages 370-371.

Table 1: Selected PSPS Targets from BVES’s WMP⁹

Initiative Activity	2023 Target	2024 Target	2025 Target
Number of PSPS events	5	3	2
Number of customers impacted	8,000	6,000	4,000
Number of circuits de-energized	10	6	4

BVES anticipates five PSPS events occurring in 2023, but “has not experienced conditions to invoke a PSPS” at the time of its 2023-2025 WMP submission.¹⁰

Further, in its latest two Quarterly Data Reports (QDRs) from Q4 2022¹¹ and Q1 2023,¹² BVES projects zero future PSPS events. The projections of zero PSPS events are also reflected in BVES’s WMP.¹³

Table 2: Selected PSPS Performance Metrics from BVES’s QDRs and WMP

Initiative Activity	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected
Number of PSPS events¹⁴	0	0	0	0	0	0
Number of customers impacted¹⁵	0	0	0	0	0	0
Number of circuits de-energized¹⁶	0	0	0	0	0	0

⁹ BVES’s 2023-2025 WMP, Table 9-5 “PSPS Targets,” pages 370-371.

¹⁰ BVES’s 2023-2025 WMP, page 376.

¹¹ [BVES’s Q4 2022 Quarterly Data Report](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53474&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53474&shareable=true>, accessed July 10, 2023).

¹² [BVES’s Q1 2023 Quarterly Data Report](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53756&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53756&shareable=true>, accessed July 10, 2023).

¹³ BVES’s 2023-2025 WMP, Table 9-6 “Projected PSPS Performance,” pages 374-375.

¹⁴ BVES Q1 2023 Quarterly Data Report, Table 10.

¹⁵ BVES’s 2023-2025 WMP, Table 9-6 “Projected PSPS Performance,” pages 374-375.

¹⁶ BVES’s 2023-2025 WMP, Table 9-6 “Projected PSPS Performance,” pages 374-375.

In the WMP narrative, BVES states a commitment to PSPS reduction:

Although BVES has never implemented PSPS, BVES is committed to reducing the scope, frequency, and duration of PSPS events, should it be necessary when the safety risk of imminent fire danger is greater than the impact of de-energization. As BVES continues to reduce ignition risk, BVES anticipates the likelihood to need to use its PSPS to become even more remote, but BVES will continue to evaluate the risk and necessity for its use.¹⁷

Additionally, BVES states it has an ongoing 10-year plan to “[e]valuate and adjust as appropriate PSPS activation thresholds as grid hardening initiatives are completed and the risk of ignitions is reduced.”¹⁸

Energy Safety finds that BVES’s PSPS targets (e.g., anticipating five events in 2023) are not supported by information found in its QDRs (which project no PSPS events) or its WMP narrative (which indicates that it anticipates less likelihood for PSPS events).

Energy Safety understands the necessity for PSPS is dependent on exogenous factors; however, a target projecting a significant increase from pasts PSPS usage is nonsensical given the historical context and qualitative commitments in the narrative. As such, BVES must revise the PSPS section of its WMP.

3.1.2.1 Required Remedies

BVES must update its WMP’s Section 9, “Public Safety Power Shutoff,” to bring its targets into alignment with its narrative (including historical number of PSPS events, number of customers impacted by PSPS events, and number of circuits de-energized in PSPS events).

4. Conclusion and Next Steps

BVES must submit its Revision Notice Response via email to Energy Safety’s Policy Division’s Program Manager (lucy.morgans@energysafety.ca.gov) and also to the 2023-2025 Wildfire Mitigation Plan docket.¹⁹ BVES must concurrently serve its Revision Notice Response to the California Department of Forestry and Fire Protection (CAL FIRE) at CALFIREUtilityFireMitigationUnit@fire.ca.gov.

BVES’s Revision Notice Response is due within 15 days of this Revision Notice’s issuance.

¹⁷ BVES’s 2023-2025 WMP, page 361.

¹⁸ BVES’s 2023-2025 WMP, page 368.

¹⁹ [2023 to 2025 Electrical Corporation Wildfire Mitigation Plans docket \(2023-2025-WMPs\)](#)

(<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>, accessed July 24, 2023).

For each of the two critical issues identified herein, Energy Safety sets forth specific remedies that BVES must fully address and respond to within its Revision Notice Response. Failure to fully address and respond to each remedy within the Revision Notice Response by the designated date may result in denial of BVES’s Base Plan. Energy Safety will not accept any updates or errata to Revision Notice Responses after the due date.

Stakeholders may submit opening comments in reference to BVES’s Revision Notice Response within 15 days of publication of BVES’s Revision Notice Response. Reply comments are due 10 calendar days thereafter and must be limited to issues raised and representations made in other stakeholders’ opening comments. Opening and reply comments must be submitted to the 2023-2025 Wildfire Mitigation Plan docket.^{20, 21, 22}

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Program Manager | Electric Safety Policy Division
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²⁰ [2023 to 2025 Electrical Corporation Wildfire Mitigation Plans docket \(2023-2025-WMPs\)](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs) (https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs, accessed July 24, 2023).

²¹ [2023 to 2025 Electrical Corporation Wildfire Mitigation Plans docket \(2023-2025-WMPs\)](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs) (https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs, accessed July 24, 2023).

²² If any deadline falls on a weekend or holiday, the deadline will be moved to the following business day. Dates falling on a Saturday, Sunday, or holiday as defined in Government Code section 6700 have been adjusted to the next business day in accordance with Government Code section 6707.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED

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