



August 24, 2022

VIA E-MAIL

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

RE: BVES 2022 Independent Evaluator Annual Report on Compliance

Dear Director Thomas Jacobs:

Bear Valley Electric Service, Inc. (BVES) is providing its response to 2022 Independent Evaluator Annual Report on Compliance dated June 30, 2023.

INTRODUCTION

BVES appreciates the opportunity to provide comments to the Independent Evaluator (IE) Report. BVES recognizes the effort required of the Sargent & Lundy team to conduct this extensive review within the allotted timeframe and the level of collaboration achieved to complete it on time. Overall, the IE determined that “of the 101 total initiatives, BVES adequately met 80 WMP initiatives, did not meet 4, and 17 were not applicable to BVES”. BVES substantially agrees with the findings by the IE. However, BVES would like to comment on the IE findings regarding the “quality assurance / quality control of inspections” initiative.

QUALITY ASSURANCE / QUALITY CONTROL OF INSPECTIONS

The IE report stated that “With regard to the “quality assurance / quality control of inspections” initiative (7.3.4.14), BVES was completing quality control activities; however, objective evidence of quality assurance overview of the activities being performed was not provided and, therefore, the goal was not met. Additional formal written QA/QC programs and procedures in future years will also help validate the BVES WMP”.

While BVES appreciates the IE’s constructive comments on QA/QC programs throughout the report, BVES disagrees with the IE’s conclusion for the following reasons:

- Nowhere in the report does the IE identify any workmanship issues or incomplete QA/QC activities due to the lack of formal written QA/QC programs and procedures. The IE did not identify any work product quality issues. In fact, the non-compliant initiatives identified were not the result of poor workmanship, quality issues, or poor inspections, but rather issues with supply chain delivery and permitting beyond BVES’s control.

- BVES performs a significant amount of QA/QC work as outlined in Independent Evaluator report under Section 2.1.5.1.26. Initiative #7.3.4, pg. 50. BVES believes it performs the necessary QA/QC to ensure quality of work even though many processes are not formally written.
- Several of the QA/QC inspections such as Detailed, Patrol and Third Party inspections are conducted utilizing the California Public Utilities Commission's (CPUC) General Order 95, Rules for Overhead Electric Line Construction (GO-95), GO-165, Inspection Requirements for Electric Distribution and Transmission Facilities and other accepted industry standards. BVES has checklists for Detailed and Patrol inspections. Additionally, BVES utilizes inspection checklists for substation inspections performed per GO-174, Rules for Electric Utility Substations.
- BVES also conducts a QA/QC procedure of cross-checking inspection data from various sources (UV, Visual, LiDAR, detailed, patrol and third party inspections) to determine if consistent results are provided. Any unusual findings are investigated. These cross checks are now being documented.
- Formal written QA/QC procedures are not a requirement and can be especially burdensome for a small organization such as BVES. For example, in the area of inspection, BVES has one Field Inspector who is a Journeyman Lineman with many years of experience (>20 years) and is supervised by a senior Field Operations Supervisor with over 40 years of transmission and distribution operations and maintenance.

BVES agrees that formal written QA/QC procedures are a best practice and certainly add value; therefore, BVES is currently evaluating its overall QA/QC program and is developing, updating and providing written procedures for select key processes. BVES is also taking steps to better document the QA/QC activities it performs.

CONCLUSION

BVES appreciates the opportunity to submit this response to the IE Report prepared by Sargent & Lundy and respectfully requests that Energy Safety and the IE take these comments into account when reviewing and finalizing the report.

Sincerely,

Paul Marconi
President

Digitally signed by Paul
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