

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA**

Office of Energy Infrastructure Safety
Natural Resources Agency

**COMMENTS OF THE GREEN POWER INSTITUTE ON THE
DRAFT DECISION ON THE 2023-2025 WILDFIRE
MITIGATION PLAN OF BEAR VALLEY ELECTRIC SERVICE**

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MITIGATION PLAN OF BEAR VALLEY ELECTRIC SERVICE**

The Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, provides these *Comments of the Green Power Institute on the Draft Decision on the 2023-2025 Wildfire Mitigation Plan of Bear Valley Electric Service*.

Introduction

OEIS issued a Draft Decision on the 2023-2025 Wildfire Mitigation Plan of Bear Valley Electric Service, Inc on September 21, 2023. GPI generally supports the Areas for Continued Improvement (ACI) issued in the Draft Decision. However, as previously discussed in our comments on the Draft Decision on the 2023-2025 WMP of SCE and SDG&E, we advocate for additional detail in the Draft Decision given the 3-year implementation timeline, and we recommend strengthening the operationalization expectations for studies and collaborations. These comments largely mirror our comments on the OEIS Draft Decisions on SCE and SDG&Es 2023-2025 Base WMPs. We provide comments on the following topics:

- The 2023-2025 Base WMPs warrant more a detailed review in the Draft Decisions and should require Utilities to report on any updated standards and/or risk mitigation approached informed by current and on-going studies.
- Expand discussions on Maturity Survey results and how they reflect identified strengths and weaknesses in BVES's WMP.
- Section 5.4.1 should contain an assessment of BVES progress on securing permits for the Radford Line and a separate ACI addressing the permitting delay.
- GPI recommends accelerating the deadline for Required Progress on BVES-23-01 Target Verification Methods.

- Section 6.4 “Risk Methodology and Assessment”, on BVES’s WMP Strengths includes conjecture, which is more appropriate for informing an ACI rather than a strengths statement.
- Section 6 “Risk Methodology and Assessment” and Section 7 “Risk-informed Framework” ACI recommendations.
- Grid Design, Operations, Maintenance Section 8.1 ACI recommendations.
- Maturity Survey capability “learning after wildfire and PSPS incidents” may need to be adjusted for application to BVES.
- GPI’s written and oral Comments on IOU WMPs have directly contributed to ACIs issued in the Draft Decisions on BVES’s 2023-2025 Base WMP. Stakeholder comments also contribute to the justification basis for Draft Decisions, enrich the WMP public record, can encourage change at the LSE-level, and can initiate long-term ideation that is not yet formally adopted or formalized in the record.

The 2023-2025 Base WMPs warrant more a detailed review in the Draft Decisions and should require Utilities to report on any updated standards and/or risk mitigation approached informed by current and on-going studies.

GPI has a first-hand appreciation of the challenge and time required to review, assess, and summarize the WMPs and supporting documents. We respectfully recommend expanding the Draft Decision review given its function for establishing a record on the basis of plan approvals/denials and guiding the development of electric utility wildfire mitigation approach through 2025. GPI provides a detailed discussion in our comments on the OEIS Draft Decisions on SCE and SDG&E’s 2023-2025 Base WMPs that is directly relevant to BVES’s 2023-2025 Base WMP and the corresponding Draft Decision.¹ In the interest of efficiency we summarize and expand on our earlier comments here.

GPI supports the OEIS move to reestablish a 3-year WMP cycle with interim updates. However, restructuring the filing requirements should also be accompanied with the setting of statewide

¹ GPI Comments on the Draft Decisions on the 2023-2025 WMPs of SCE and SDG&E, pp 2-8.

objectives and WMP milestones that guide electric utility progress over the 3-year planning horizon. There are two opportunities before the 10-year mark to establish 3-year forward looking trajectories that steer wildfire mitigation planning towards state-level objectives. That is, the next opportunity to materially guide WMP development and progress will be in the 2026-2028 WMP, which will correspond to 10-years after R.18-10-007 was opened at the CPUC. While substantive progress has been made relative to the cursory wildfire mitigation plan compliance reports filed in 2019, the state of California has yet to move planning towards standardized methodologies that transparently balance ratepayer safety, reliability, and costs. Building out a long-view trajectory with milestones that guide and benchmark California electric utility wildfire mitigation planning can substantially improve the value of the 2023-2025 Base WMP Draft Decisions. Alternatively, given time constraints this could also be achieved in a subsequent OEIS filing.

The Draft Decision dedicates large swaths to Maturity Survey results, boilerplate language, and brief WMP section and strength summaries. GPI recommends enriching the Draft Decision discussions to include a more comprehensive review of BVES's current planning capabilities and progress that connects each review element, including maturity survey results and plan targets/objectives.

Expand discussions on Maturity Survey results and how they reflect identified strengths and weaknesses in BVES's WMP

GPI recommends standardizing and expanding sections on the electrical corporation maturity surveys. For example, BVES's Draft Decision Sections 8.1.2.1 and 8.1.4.1 have no description of limiting or most advanced capabilities.² Section 8.1.3.1 reports a substantive increase in minimum maturity of Asset Inspections, but does not clarify the plan elements that are driving this change. GPI recommends tying maturity survey results to plan outputs and outcomes in order to substantiate the results and link them to plan strengths and weaknesses over time. A more detailed discussion on Maturity Survey Results and Draft Decision content is provided in our comments on the Draft Decisions on SCE and SDG&E's 2023-2025 Base WMPs.³

² OEIS Draft Decision on BVES 2023-2025 WMP, p. 51

³ GPI Comments on the Draft Decisions on the 2023-2025 WMPs of SCE and SDG&E, pp 2-8

Section 5.4.1 should contain an assessment of BVES progress on securing permits for the Radford Line and a separate ACI addressing the permitting delay

As described in Section 5.4.1 on Environmental Compliance and Permitting, “Compliance with permitting requirements add time and complexity to project planning...”⁴ The Draft Decision only states that BVES provided a summary regarding how it will comply, but later highlights how US Forest Service permitting delays have resulted in delays to the Radford Line risk mitigation project year after year.⁵ Based on the ongoing Radford Line hardening project delay due to USFS permitting issues, GPI recommends minimally cross-listing ACI BVES-23-09 Radford Line Project under section 5.4.1 and updating the ACI to reflect permitting as the critical path milestone impacting timely project completion. We minimally recommend the following changes:

BVES-23-09. Radford Line Project

o Description: BVES’s covered conductor replacement for the Radford Line has been delayed continuously since 2019.

o Required Progress: In its 2025 Update, BVES must provide a status update on the completion of the Radford line project, including (1) The status of the USFS permit process, including an updated timeline reflecting best estimates for permit approval and how it has been and will continue to working with the USFS to expedite completion of the permit, including a description of all interactions BVES has had and plans to have with USFS regarding permit issuance, if the permit is not yet issued; (2) How it plans to expedite construction after receiving a permit from the USFS and provide a critical path milestone threshold date by which time the lack of a permit would delay completion of the project past 2023. If the permit from USFS continues to delay the project, BVES must provide an update on how it has been working with the USFS to expedite completion of the permit, including a description of all interactions BVES has had with USFS regarding permit issuance; and (3) Additionally, BVES must provide plans on how it will reduce impacts and delays for any similar hardening projects moving forward including a strategic plan for both permitting and project management in WMP sections on Environmental Compliance and Permitting and Grid Hardening, respectively.

o Discussed in Section 5.4.1 “Environmental Compliance and Permitting” and Section 8.1, “Grid Design, Operations, and Maintenance” (8.1.2 “Grid Design and System Hardening”).

New text is underlined, strikethrough denotes removed or relocated text.

Since USFS permitting is the current limiting, critical path milestone, GPI recommends separating ACI BVES-23-09 into two ACIs. The new ACI should address reporting on and

⁴ OEIS Draft Decision on BVES 2023-2025 WMP, p. 21

⁵ OEIS Draft Decision on BVES 2023-2025 WMP, p. 38

improving the permitting process to the extent possible. The second ACI should address project construction planning and implementation once the permit is issued and to ensure as timely deployment as possible. Delineating BVES-23-09 into two separate ACIs will likely improve response clarity and comprehensiveness, improve BVES response tracking, improve correlation to WMP sections and section requirements, and will allow OEIS to sequentially “close” the ACIs as critical path milestones are completed.

GPI recommends accelerating the deadline for Required Progress on BVES-23-01 Target Verification Methods

The ACI BVES-23-01 “Target Verification Methods” stipulates Required Progress on reporting the methods that BVES uses to verify year-to-year targets. The ACI sets the reporting deadline as the 2026-2028 WMP. This reporting date is too far in the future. BVES likely already has some target tracking and verification methods in place that it can readily report on. Any methodological gaps that BVES will fill should be monitored through a trackable plan, both internally and externally, beginning in 2024 with reporting in the 2025 WMP Update. Leaving this type of reporting and plan development until the next 3-year WMP could delay and obfuscate progress towards addressing the ACI. GPI recommends changing the Required Progress reporting date for BVES-23-01 to the 2025 WMP Update, and adding a requirement that BVES provide a work plan, with milestones and a timeline, that outlines planned steps to close any target verification capabilities. For example, for target tracking gaps, BVES may plan to research, select, and implement target tracking software, with each plan milestone corresponding to deliverables with deadlines.

Section 6.4 “Risk Methodology and Assessment”, on BVES’s WMP Strengths includes conjecture, which is more appropriate for informing an ACI rather than a strengths statement

The BVES Draft Decision WMP Strengths Statement on Section 6. “Risk Methodology and Assessment” states:

BVES’s recent, and ongoing, efforts to implement a wildfire risk modeling platform comparable to that of the large investor-owned utilities (IOUs) will facilitate future mentorship opportunities that

may arise with the large IOUs. Further, this may enable BVES to implement best practices that are dependent on accessing data of comparable quantity and quality as used by large IOUs.⁶

GPI generally agrees, and our WMP comments highlight that the move to use Technosylva models, which are also used by the IOUs, is a step in the right direction.⁷ However, the Draft Decision statement has equivocal language and includes speculation, which we believe is misplaced in a “strengths” statement. While the speculation regarding “future” mentorship opportunities that “may arise” and BVES “may” be enabled to implement best practices, are possible beneficial outcomes, they are not strengths until they are operationalized. We interpret the equivocal language as a reflection of BVES’s WMP and our comments regarding the need for additional detail on SMJU, including BVES’s, modeling and model application plan.^{8,9,10} We are also concerned that “best practices” for Risk Methodology and Assessment remains an elusive concept given the wide range of wildfire risk modeling and application approaches in use by IOUs and SMJUs. GPI recommends re-working this statement to include specifics on BVES’s concrete improvements and actionable plans for Risk Methodology and Assessment over the 3-year planning horizon. For example:

BVES reported recent, and ongoing, efforts to implement a the Technosylva wildfire risk modeling platform that is also utilized by comparable to that of the large investor-owned utilities (IOUs), will facilitate future mentorship opportunities that may arise with the large IOUs. The merge to Technosylva models gives BVES access to input data of comparable quantity and quality as used by large IOUs. However, it will be critical to follow BVES’s next steps, including whether Further, this may enable BVES to implement best practices that are dependent on accessing data access of comparable quantity and quality as used by large IOUs.¹¹ and whether it will facilitate future mentorship opportunities that may arise with the large IOUs.

New text is underlined, strikethrough denotes removed or relocated text. Multiple ACIs address the as-yet-to-be-seen value of BVES’s improvements to date and are discussed below.

⁶ OEIS Draft Decision on BVES 2023-2025 WMP, p. 26

⁷ GPI Comments on the SMJU 2023-2025 WMPs, pp 4-7.

⁸ GPI Comments on the SMJU 2023-2025 WMPs, p 6

⁹ GPI Comments on the SMJU 2023-2025 WMPs, pp 24-25

¹⁰ GPI Comments on the SMJU 2023-2025 WMPs, pp 15

¹¹ OEIS Draft Decision on BVES 2023-2025 WMP, p. 26

GPI also respectfully requests that the Draft Decision clarify what is meant by “best practices,” whether based on the maturity survey or another metric. Utility collaborations to date have led to a wide range of risk modeling methods and application approaches. Method alignment via the RMWG is somewhat gridlocked, with no clear determination on best practices and each utility continuing to develop their own methodology.

Section 6 “Risk Methodology and Assessment” and Section 7 “Risk-informed Framework” ACI recommendations

Section 6 is addressed in four ACIs: BVES-23-02 PSPS and Wildfire Risk Trade-off Transparency; BVES-23-03 Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety; BVES-23-04 Cross-Utility Collaboration on Risk Model Development; and BVES-23-05 Collaboration Between Vendor and Utility Risk Teams. GPI generally supports these ACIs.

We recommend adding requirements that move collaboration efforts towards operationalization using concrete milestones and timelines. We recommend requiring that BVES identify, in its WMP Updates, the “best practices” it intends to implement from cross-utility collaborations on risk modeling, climate change in consequence modeling, community vulnerability in consequence modeling, and VM (BVES-23-03, and BVES-23-04); and provide milestones and a timeline for implementing these risk assessment elements. GPI anticipates that at least some specific reporting requirements will be captured in BVES-23-06, though other topics addressed in BVES-23-03 and BVES-23-04 are at risk of remaining at a theoretical level through the 3-year planning horizon and beyond.

GPI strongly supports BVES-23-06 “Vendor Fire Risk Model Implementation Milestones and Dates,” which is in alignment with our comments on the 2023-2025 SMJU Base WMPs.¹² We appreciate the requirement for establishing milestones with dates that will create a trackable project development plan. This ACI directly reflects GPI’s recommendation in our comments on the SMJU 2023-2025 Base WMPs, especially:

¹² GPI Comments on the SMJU 2023-2025 WMPs, p 24-25

GPI recommends closely tracking the SMJUs risk modeling overhaul and establishing clear progress benchmarks and deliverables, especially given the SMJUs weak track record for developing risk model output applications.¹³

Grid Design, Operations, Maintenance Section 8.1 ACI recommendations

GPI generally supports the ACI issued in Section 11.4 in regard to Section 8.1 “Grid Design, Operations, Maintenance.”

Our Base WMP comments align with the Draft Decision and ACI BVES-23-07, that BVES has yet to make the connection between their existing WRRM output and risk informed prioritization of grid hardening mitigations, and that progress on risk planning model application is needed.^{14,15} However, pushing the Required Progress reporting deadline to the 2026-2028 WMP filing will only delay capabilities that should already be completed or minimally be a work in progress. The milestone and timeline reporting requirements for BVES-23-06, “Vendor Fire Risk Model Implementation Milestones and Dates” directly relate to the practical application of the risk models addressed in BVES-23-07. We therefore recommend requiring that BVES provide a progress update towards achieving BVES-23-07 Required Progress elements, either as part of BVES-23-06 or as interim WMP Update reporting requirements required under BVES-23-07. Waiting until the 2026-2028 WMP could push model operationalization to a full decade after the initiation of R.18-10-007. We also recommend expanding ACI BVES-23-07 to include model informed prioritization of any and all system hardening initiatives such as the replacement of high-risk assets (e.g. expulsion fuses, tree attachments), not just covered conductor.

GPI also supports ACI BVES-23-08. Similar to our comments above, we recommend requiring reporting on mitigation alternative assessment methods and applications by 2024, in the 2025 WMP update. This can be clarified by expanding BVES-23-06 to set clear expectations for reporting on progress, milestones and dates that outline a trajectory for developing methods that allow BVES to compare mitigation alternatives and portfolios. Or by including earlier reporting deadlines in ACI BVES-23-08.

¹³ GPI Comments on the SMJU 2023-2025 WMPs, p 15

¹⁴ GPI Comments on the SMJU 2023-2025 WMPs, p 5-7

¹⁵ GPI Comments on the SMJU 2023-2025 WMPs, pp 14-15

As discussed above and in the Draft Decision, the Radford Line Project delay is precipitated by a permitting issue. GPI recommends breaking ACI BVES-23-09 into two separate ACIs that address the two different aspects of the project: (1) Approach to overcome the critical path permitting delay; and (2) Project implementation plan and fast-tracking once permits are issued.

GPI also supports ACI BVES-23-10 Grid Hardening Pilots.¹⁶ We recommend expanding the Required Progress section to require feasibility, risk benefit, and barriers to implementation assessments for new technologies, as well as what would be needed in order to pilot and/or implement these wildfire mitigation technologies. REFCL, in particular, is already beyond the pilot phase at SCE and has been used extensively in Australia – there is likely sufficient information for utilities, including BVES, to conduct initial assessments on factors such as feasibility, cost, and risk mitigation potential.

GPI initiated recommendations for covered conductor specific maintenance back in 2022, given developments on equipment damage specific to covered conductors.^{17,18,19} We support the ongoing expectation for and expansion of Covered Conductor specific inspection and maintenance, including ACI BVES-23-11.

ACI BVES-23-13 “Asset Inspection QA/QC Program” states that BVES has not implemented a QA/QC process for its asset inspections. This appears to be incorrect. BVES’s WMP states “BVES’s asset QA/QC program includes the identification and actionable outcomes of deficiencies and inspection protocols executed in the field.”²⁰ However, GPI agrees with the ACI that more information on BVES’s QA/QC program is necessary, including reporting on their actual pass rates.²¹ GPI recommends updating the ACI description to better reflect BVES’s current progress towards implementing a QA/QC program.

¹⁶ OEIS Draft Decision on BVES 2023-2025 WMP, p. 76

¹⁷ GPI Comments on the 2022 WMP Updates, p. 15

¹⁸ E.g. Final Decision on SCE WMP 2022 Update, p. 13

¹⁹ E.g. Final Decision on SDG&E WMP 2022 Update, p. 24

²⁰ BVES 2023-2025 Base WMP, p. 161

²¹ GPI Comments on the SMJU 2023-2025 WMPs, p 44

Maturity Survey capability “learning after wildfire and PSPS incidents” may need to be adjusted for application to BVES.

Draft Decision Section 8.4 “Emergency Preparedness” states that BVES “reports its lowest level of projected maturity in the following capabilities for 2023 and 2024: Learning after wildfires and PSPS incidents.”²² Given that BVES has not experienced any wildfires or PSPS events, and based on their relatively small footprint and low projections for near-future wildfires and PSPS events, it may be prudent for the OEIS to establish an alternate pathway for BVES to address this capability. Alternate pathways may include BVES reporting on how they have analyzed other utility responses to PSPS and wildfires and subsequently included lessons learned in SOPs.

GPI’s written and oral Comments on IOU WMPs have directly contributed to ACIs issued in the Draft Decisions on BVES’s 2023-2025 Base WMP. Stakeholder comments also contribute to the justification basis for Draft Decisions, enrich the WMP public record, can encourage change at the LSE-level, and can initiate long-term ideation that is not yet formally adopted or formalized in the record.

GPI discussed the WMP filing record, order of filings, and value of stakeholder comments in our comments on the OEIS Draft Decisions on SCE and SDG&E’s 2023-2025 Base WMPs. Those comments equally apply to the Draft Decision on BVES’s 2023-2025 Base WMP.²³ Briefly, the BVES Draft Decisions Appendix E. states: “Energy Safety found the following stakeholder comments to concur with topics already included in Energy Safety’s findings ...” This implies that stakeholders had prior knowledge of the discussion and ACIs that OEIS planned to include in the Draft Decisions, which is simply not the case. It could be stated that Energy Safety findings concur with stakeholder comments, which were filed prior to the 2023-2025 Base WMP Draft Decisions. GPI respectfully requests that the Draft Decision be updated to reference GPI comments where they relate to the Draft Decision discussions and ACI, and update the language in Appendix E to reflect the material contributions of stakeholder comments to the Draft Decision ACIs. GPI also reiterates our openness to responding to issue-specific questions or topics that initiate targeted stakeholder discussions and enrich the public record on challenging WMP topics.

²² OEIS Draft Decision on BVES 2023-2025 WMP, p. 61

²³ GPI Comments on the OEIS Draft Decisions on SCE and SDG&E’s 2023-2025 WMPs, pp 29-31

Conclusions

We respectfully submit these comments and look forward to reviewing future wildfire mitigation plans and related filings. For the reasons stated above, we urge the OEIS to adopt our recommendations herein.

Dated October 10, 2023.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Gregory Morris". The signature is written in a cursive style and is positioned above a horizontal line.

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