May 7, 2024 **Via Electronic Filing**

Caroline Thomas Jacobs, Director
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Subject: **Comments of the Public Advocates Office on BVES' 2025 Wildfire Mitigation Plan Update**

Docket: **2023-2025-WMPs**

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the 2025 Wildfire Mitigation Plan Update of Bear Valley Electric Service, Inc. (BVES). Please contact Nathaniel Skinner (Nathaniel.Skinner@cpuc.ca.gov) or Henry Burton (Henry.Burton@cpuc.ca.gov) with any questions relating to these comments.

We respectfully urge the Office of Energy Infrastructure Safety to adopt the recommendations discussed herein.

Sincerely,

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TABLE OF CONTENTS

Page

I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on the 2025 Wildfire Mitigation Plan (WMP) Updates submitted by investor-owned electric utilities (IOUs or utilities).[1] These comments are submitted pursuant to the Office of Energy Infrastructure Safety's (Energy Safety) *Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (WMP Process Guidelines)[2] and the *Revised 2025 Wildfire Mitigation Plan Update Schedule*.[3]

The 2025 Wildfire Mitigation Plan Update Guidelines (2025 WMP Update Guidelines)[4] establish substantive requirements for these WMP Update submissions, while the WMP Process Guidelines establish a schedule and review process for WMP submissions. Consistent with the aforementioned schedule, Bear Valley Electric Service (BVES), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE), submitted 2025 WMP Updates on April 2, 2024.

The 2025 WMP Update schedule permits interested persons to file opening comments on the WMP Updates of BVES, PG&E, SDG&E, and SCE by May 7, 2024 and reply comments by May 17, 2024. In these comments, Cal Advocates addresses BVES's 2025 WMP Update.

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[1] Many of the Public Utilities Code requirements relating to wildfires apply to "electrical corporations." *See e,g.,* Public Utilities Code Section 8386. These comments use the more common term "utilities" and the phrase "electrical corporations" interchangeably to refer to the entities that must comply with the wildfire safety provisions of the Public Utilities Code.

[2] Office of Energy Infrastructure Safety's (Energy Safety), *Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, January 31, 2024, in docket 2023-2025-WMPs.

See also: Energy Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022.

[3] Energy Safety, *Revised 2025 Wildfire Mitigation Plan Update Schedule*, February 22, 2024, in docket 2023-2025-WMPs.

[4] Energy Safety, *2025 Wildfire Mitigation Plan Update Guidelines*, January 31, 2024, in docket 2023-2025-WMPs.

II. TABLE OF RECOMMENDATIONS

Item	Recommendation	Timeframe	Section of these Comments
1	Energy Safety should require BVES to confirm contact information for medical-baseline customers, and verify this information every two years.	Revised 2025 WMP Update	III.A
2	BVES should verify which circuits serve medical-baseline customers and should update this information every two years or when there is a change in circuit configuration	Revised 2025 WMP Update	III.A
3	Energy Safety should require BVES to update its PSPS procedures to include thresholds based on its new fire potential index (FPI).	Revised 2025 WMP Update	III.B
4	Energy Safety should require BVES to implement a more thorough quality control program for asset inspections.	Revised 2025 WMP Update	IV.A
5	Energy Safety should require BVES to develop a program of fast-trip settings.	2026-2028 WMP	V.A
6	Energy Safety should direct BVES to collaborate with other utilities to learn from the successes and pitfalls of their fast-trip programs	2026-2028 WMP	V.A
7	Energy Safety should monitor BVES's vegetation management program to ensure that it is sufficient.	Ongoing	VI.A
8	Energy Safety should examine if there are lessons to be learned from comparing BVES and PG&E's vegetation management cycles.	Ongoing	VI.A
9	Energy Safety should require BVES to remove its solar and storage projects from its WMP.	Revised 2025 WMP Update	VII.A
10	In the alternative, Energy Safety should state that approval of BVES's WMP does not reflect any determination on the necessity or reasonableness of the solar and storage project.	Decision on 2025 WMP Update	VII.A

III. PUBLIC SAFETY POWER SHUTOFFS

A. Energy Safety should require BVES to confirm contact information and circuit locations for medical-baseline customers.

Power outages can be life-threatening for some customers.[5] Medical-baseline customers are of particularly high concern,[6] and it is extremely important to give them prior notification of power outages. Although BVES has not instituted a public safety power shutoff (PSPS) yet, the possibility of a PSPS remains.[7] Unfortunately, other utilities have encountered deficiencies when trying to notify customers of PSPS events, especially the first few times those utilities implemented PSPS events.[8] Since BVES has not had a PSPS yet, Cal Advocates anticipates that BVES may face difficulties notifying its customers in advance of a PSPS event. Given the experience of other utilities and their failures to properly notify customers, it is critical that BVES ensures it has correct contact information for medical-baseline customers.

When asked what it has done to confirm medical-baseline customer contact information, BVES states that it pulls information from its billing system.[9] Although using its billing system is a good starting point, other utilities have found that this approach is not sufficient to obtain up-to-date contact information.[10] It is likely that some telephone numbers are no longer working. Furthermore, with only 188 medical-baseline customers to account for,[11] BVES can feasibly and proactively call or write to these customers to verify their contact information.[12] Moreover, it is necessary and reasonable for BVES to confirm it has correct telephone numbers (as well as email addresses) for all of its medical-baseline customers at least every two years.

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[5] See https://www.foxnews.com/us/oxygen-dependent-man-dies-12-minutes-after-pge-cuts-power-to-his-home

[6] See https://www.cpuc.ca.gov/consumer-support/financial-assistance-savings-and-discounts/medical-baseline

[7] *Bear Valley Electric Service, Inc. Public Safety Power Shutoff Plan*, January 31, 2023.

[8] See https://www.cbsnews.com/sanfrancisco/news/psps-advocates-seek-166m-penalty-against-pge-over-failing-to-notify-400k-customers-of-shutoffs/

[9] BVES's Response to CalAdvocates-BVES-2025WMP-01, April 16, 2024.

[10] See https://www.cbsnews.com/sanfrancisco/news/psps-advocates-seek-166m-penalty-against-pge-over-failing-to-notify-400k-customers-of-shutoffs/

[11] BVES's 2023-2025 WMP Update, 2025 Revision 0 Redline at 377.

[12] By contacting 20 customers per day, one employee could verify all 188 medical-baseline customers within two weeks.

In addition, BVES should know on which circuits its medical-baseline customers are located. Before BVES drafted its PSPS procedures, BVES had little need to know which circuits its customers resided on because this information is not necessary for billing. As a result, BVES's list of which customers are on which circuits may be out of date. If BVES implements a de-energization on only some of its circuits, it needs to know which medical-baseline customers will be affected. Therefore, BVES should verify its list of which meters are on which circuits for medical-baseline customers and should update it at least every two years, or any time there is a change in circuit configuration.

In short, since a PSPS event may be life-threatening for a medical-baseline customer,[13] and BVES only has 188 medical-baseline customers, Energy Safety should require BVES to confirm contact information and circuit names for all its medical-baseline customers at least every two years. Before approving BVES's 2025 WMP Update, Energy Safety should require BVES to revise its 2025 WMP Update to include this two-year verification cycle. This step will bring BVES closer to the ability to execute PSPS events without undue risks to its most vulnerable customers.

B. Energy Safety should require BVES to update its PSPS procedures to include thresholds based on its new fire potential index.

The documentation of PSPS procedures is essential to operating a PSPS event as safely as possible. All internal utility personnel need to have the same understanding of what to do during a PSPS event. In addition, external stakeholders such as customers need to be able to confirm that BVES's PSPS events are properly implemented. One input that utilities use to decide when to trigger PSPS events is a "fire potential index," which combines temperature, wind, humidity, and other variables into a single number.[14] BVES implemented a fire potential index (FPI) as described in its 2025 WMP Update:[15]

> BVES received an FPI model developed by Technosylva tailored to the BVES service area in December 2023 and is now utilizing it on a daily basis as of Q1 2024 as an operations tool related to wildfire potential and PSPS implementation.

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[13] See https://www.cpuc.ca.gov/consumer-support/financial-assistance-savings-and-discounts/medical-baseline

[14] BVES's 2023-2025 WMP Update, 2025 Revision 0 Redline at 68.

[15] BVES's 2023-2025 WMP Update, 2025 Revision 0 Redline at 396.

BVES's current PSPS procedures do not include its newly developed FPI.[16] Since having reasonable PSPS thresholds and following them are essential parts of PSPS operations and BVES uses the FPI as a trigger for its PSPS events, BVES should explain how it uses FPI in its PSPS operations.[17]

Availability of weather data in the event of a government shutdown is also a concern. BVES's current PSPS thresholds rely on data that is not available during a government shutdown,[18] while the FPI would not be affected. This is another reason BVES needs to revise its PSPS procedures to address FPI thresholds.

Before approving BVES's 2025 WMP Update, Energy Safety should require BVES to update its PSPS procedures and specifically instruct BVES to include how it uses fire potential index as an "operations tool."[19] Customers and regulators need to know whether or not BVES is properly instituting PSPS events. Moreover, updating its PSPS procedures will make BVES more accurate (and therefore safer) in its PSPS operations.

IV. ASSET INSPECTIONS AND MAINTENANCE

A. Energy Safety should require BVES to implement a more thorough quality control program for asset inspections.

Since 2021, Cal Advocates has recommended that BVES implement a quality control program on its asset inspections.[20] Cal Advocates' concern is that inspectors may not uncover all issues during initial asset inspections. Quality control is needed to determine the accuracy of such inspections because even with an inspection program, risks can occur if the inspections are not properly executed. A quality control program will inform BVES if some inspectors are missing an unacceptable number of problems. If a quality control program determines that an inspector does not notice enough issues, BVES can take remedial action by revising inspection procedures or providing supplemental training to inspectors.

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[16] BVES's Response to CalAdvocates-BVES-2025WMP-01, April 16, 2024.

[17] BVES confirmed that its fire potential index is a trigger for PSPS events in its presentation to the April 25, 2024 workshop.

[18] *Bear Valley Electric Service, Inc. Public Safety Power Shutoff Plan*, January 31, 2023 at 9.

[19] BVES's 2023-2025 WMP Update, 2025 Revision 0 Redline at 396.

[20] *Cal Advocates Comments on the 2021 WMP Updates of the Small and Multijurisdictional Electric Utilities*, April 14, 2021 at 12.

Although BVES states it implemented a quality control program, its only requirement for quality control is an annual review of BVES inspectors' backgrounds.[21] However, a qualification check does not ensure inspectors are actually finding asset issues if they exist on a given inspection. Given that BVES needs to ensure that inspections are effective at minimizing wildfire risk, BVES's current quality control program is insufficient.

Energy Safety should require BVES to develop a new quality control program that ensures BVES's asset inspections properly minimize asset failure and wildfire risk. Among other things, an effective quality control program would include a sample (such as 5 percent) of detailed and patrol inspections, done by a different inspector, with a required pass rate of 95 percent. If any inspector does not have a pass rate of 95 percent, the inspector should be flagged for retraining and BVES should reinspect all or most of her/his inspections in the last 12 months. Alternatively, if Energy Safety does not think this level of quality control is necessary, Energy Safety should, at a minimum, require BVES to test its inspectors each year with visual tests[22] to ensure that its inspectors are appropriately finding issues on the equipment they inspect.

V. GRID OPERATIONS

A. Energy Safety should require BVES to develop a program of fast-trip settings.

The electric grid's protection equipment protects people and equipment when an errant condition (also known as a fault) occurs. Traditionally, utilities have used the same protective settings year-round to ensure maximum reliability.[23] Catastrophic wildfires have forced Californian utilities to rethink these protective settings and change these settings on high fire-risk days.[24] BVES has already disabled automatic reclosing during its fire season,[25] but needs to do more to minimize the chance of a catastrophic wildfire.

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[21] BVES's Response to CalAdvocates-BVES-2025WMP-02, April 17, 2024.

[22] E.g. a computer-based test with photographs of assets that may be defective. Inspectors should never see the same question twice.

[23] See *Network Protection & Automation Guide*, Schneider Electric, Available at https://go.schneider-electric.com/WW_201910_NPAG-ebook-full-access-Content_MF-LP-EN.html?source=Content&sDetail=NPAG-ebook-full-access-Content_WW

[24] SDG&E's Response to CALPA-SDGE-TYH-10122021, October 26, 2021.

[25] Reclosing refers to automatically re-energizing a power-line after a fault to check if the fault was temporary.

Other utilities have had success with so-called "fast-trip" settings which quickly shut down power to the fault-affected segment. Notably, SDG&E has been using these "fast-trip" (Sensitive Relay Profile) settings since 2011[26] and has never experienced an ignition on a fast-trip-enabled circuit despite 90 faults.[27] The settings SDG&E uses during high fire-threat days are roughly as follows:[28]

Table 1: SDG&E's Approximate Fast-Trip Settings

	Tripping Current	Intentional Time Delay
Phase[29]	150% of five year historical maximum current[30]	0.5 cycles[31]
Ground	Five year historical maximum current + 10 Amperes[32]	0.5 cycles

SDG&E's settings are designed to permit a reasonable increase in load, while quickly de-energizing in the case of a fault. BVES is the only California investor-owned electric utility that does not have a fast-trip program.[33]

Standard protective settings often wait for fuses to operate before de-energizing to ensure maximum reliability.[34] Because fuses can take longer than four minutes to fully melt, they pose

[26] "SDG&E first implemented sensitive relay profile (SRP) settings on SDG&E's distribution system in 2011." SDG&E's response to data request CalAdvocates-SDGE-NonCase-AL-04122024, question 6, April 26, 2024.

[27] SDG&E's 2023-2025 WMP at 234.

[28] SDG&E's Response to CALPA-SDGE-TYH-10122021, October 26, 2021 and *Utility Benchmarking of Fast Trip Schemes and Relay Technologies for Fire Mitigation*, available at https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-and-enforcement-division/documents/epss-reports/utility-benchmarking-of-fast-trip-schemes-and-relay-technologies-for-fire-mitigation.pdf

[29] Also known as line current.

[30] This would need to be changed in the case of significant electrical construction.

[31] A cycle is approximately 16 milliseconds, which corresponds to a grid frequency of 60 Hz.

[32] Root-mean-square current. See https://spark.iop.org/explaining-rms-voltage-and-current

[33] 2023 -2025 WMP Joint IOU Covered Conductor Working Group Report, Table 8, available at https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53548&shareable=true

[34] If reclosers did not wait for fuses to operate, there would be no use for fuses. See *Network Protection & Automation Guide*, Schneider Electric, Available at https://go.schneider-electric.com/WW_201910_NPAG-ebook-full-access-Content_MF-LP-

a major wildfire risk.[35] While waiting for fuses to operate may be reasonable for winter storms, it is not acceptable on high fire-risk days.[36] Having reclosers[37] "over-reaching" fuses (i.e. operating before the fuses melt) during high fire-threat weather offers a better solution. During high fire-risk conditions, faster tripping settings have been shown to be more effective than BVES's current plan to only disable reclosing.[38]

BVES should be able to leverage the knowledge gained by other utilities to develop effective tripping settings for fire risk.[39] BVES can enable these settings whenever it determines that fire-risk is extremely high. If it cannot, BVES should set up an "always-on" protective system during the wildfire season that balances reliability and safety (and does not wait for fuses to operate).[40]

Energy Safety should require BVES to start a fast-trip program for high-fire-risk days. In addition, Energy Safety should direct BVES to collaborate with other utilities to learn from the successes and pitfalls of their fast-trip programs. Energy Safety should require BVES to include a new fast-trip program in its 2026-2028 WMP.

VI. VEGETATION MANAGEMENT

A. Energy Safety should monitor BVES's vegetation management program.

Vegetation management is essential to reduce wildfire risk. A high percentage of ignitions result from vegetation falling onto electric power-lines.[41] At the same time, vegetation

EN.html?source=Content&sDetail=NPAG-ebook-full-access-Content_WW

[35] See https://www.sandc.com/globalassets/sac-electric/documents/public---documents/sales-manual-library---external-view/tcc-number-170-6.pdf

[36] SDG&E's 2023-2025 WMP at 234.

[37] Reclosers are integrated current sensors, computers, and circuit breakers that are able to de-energize power-lines under abnormal conditions.

[38] For example, two 0.2-second pulses (which would occur when a recloser trips and then attempts to reclose) deliver less energy than one 2.0-second pulse (which represents the energy released prior to tripping with a moderate delay of 2.0 seconds).

[39] To minimize fire risk, BVES should not tolerate a delay of more than two seconds at 200 percent of maximum historical current on any relay or recloser on high fire-risk days. It is highly unlikely that 200 percent of maximum historical current will occur due to customer load.

[40] One possibility includes using SDG&E's tripping current with an intentional delay of 0.1 seconds and one reclose after one minute, to minimize the impact of transient faults and transformer inrush.

[41] See fire ignition data at https://www.cpuc.ca.gov/industries-and-topics/wildfires

management represents a significant cost to already burdened ratepayers.[42] These important safety and cost considerations demonstrate that it is imperative to have an optimal vegetation management plan.

BVES's vegetation management plan is quite different from PG&E's vegetation management plan. BVES has a three-year vegetation management cycle, with a yearly patrol,[43] while PG&E aims to trim trees twice per year.[44] The stark contrast between the two utilities' vegetation management plans suggests one utility can learn from the other.

Energy Safety should monitor BVES's vegetation management plan to ensure that it is sufficient. In addition, Energy Safety should see if there are any lessons to be learned from comparing BVES and PG&E's vegetation management cycles to either reduce costs or improve safety.

VII. OTHER ISSUES

A. Energy Safety should require BVES to remove its solar and storage projects from its WMP.

BVES's solar and storage projects originally appeared in BVES's 2020 WMP.[45] BVES claims that these projects will assist it in providing power in the event that SCE implements a PSPS event that cuts the power supply to BVES.[46] If constructed, this system will provide approximately 1 MW of additional power[47] in case of loss of supply from SCE. Since BVES already has an 8.4 MW generator,[48] this would represent an approximately 12 percent increase in the amount of load BVES can serve during an SCE outage.

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[42] See BVES's 2023 Q4 WMP quarterly report, Table 11.

[43] BVES's Response to CalAdvocates-BVES-2025WMP-05, April 17, 2024.

[44] See PG&E's *Distribution Vegetation Management Program*, June 20, 2023 at 4, available at https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/TD-7102S-DISTRIBUTION-VEGETATION-MANAGEMENT-PROGRAM.pdf

[45] BVES's 2020 WMP at 49.

[46] Bear Valley Electric Service 2023-2025 Wildfire Mitigation Plan at 146.

[47] BVES proposes constructing 5 MW of solar generation and a 20 MWh battery system. Based on 5 MW at 20% capacity factor, this system would provide an average of 1 MW of power. See https://atb.nrel.gov/electricity/2022/utility-scale_pv

[48] See https://www.bvesinc.com/assets/documents/fact-sheet/bves-fact-sheet-2024-1.31.pdf

BVES's solar and storage projects' main function is to increase renewable energy. A 1 MW increase in generation is small in comparison to BVES's peak load of 42 MW.[49] This fact, combined with the fact that SCE has never instituted a PSPS that has affected BVES, means that the safety and reliability implications of these projects are minimal. Programs in WMPs should be limited to projects that operate mainly for wildfire safety.

Energy Safety should require BVES to remove its solar and storage projects from its 2025 WMP Update before approval. At a minimum, Energy Safety should state that approval of BVES's WMP does not reflect any determination on the necessity of the solar and storage project or the reasonableness of the associated costs.

VIII. CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed herein.

Respectfully submitted,

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[49] See https://www.bvesinc.com/assets/documents/fact-sheet/bves-fact-sheet-2024-1.31.pdf