



May 14, 2024

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

**Subject: Rejection and Order to Resubmit for Bear Valley Electric Service, Inc. 2025 Wildfire Mitigation Plan Update**

Mr. Marconi:

The Office of Energy Infrastructure Safety (Energy Safety) rejects the Bear Valley Electric Service, Inc. (BVES) 2025 Wildfire Mitigation Plan Update (2025 WMP Update) submission dated April 1, 2024,<sup>1</sup> and orders BVES to resubmit its 2025 WMP Update, pursuant to Public Utilities Code section 8386.3(a). BVES's 2025 WMP does not conform to the submission requirements outlined in Energy Safety's 2025 WMP Update Guidelines<sup>2</sup> and a conforming plan must be submitted before Energy Safety can perform its substantive evaluation.

**By May 29, 2024, BVES must file a 2025 WMP Update submission that conforms to the requirements in Energy Safety's 2025 WMP Update Guidelines.**

Opening comments on BVES's resubmitted 2025 WMP Update are due by June 10, 2024. Energy Safety will consider all comments submitted in response to the BVES 2025 WMP Update in its evaluation, including comments submitted for the initial April 1, 2024, version. Stakeholders may submit additional comments in response to the revised BVES 2025 WMP

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<sup>1</sup>[Bear Valley Electric Service 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true>, accessed May 1, 2024). BVES submitted its 2025 WMP Update, without appendices, on April 1, 2024, with a title page dated April 2, 2024. BVES then resubmitted its 2025 WMP Update with appendices on April 5, 2024.

<sup>2</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed April 29, 2024).

Update. Reply comments are due by June 17, 2024, and must be limited to issues raised and representations made in opening comments of other stakeholders. Opening and reply comments must be submitted to the 2023-2025 Wildfire Mitigation Plan docket (#2023-2025-WMPs).<sup>3</sup> Energy Safety's 2023-2025 WMP Process and Evaluation Guidelines<sup>4</sup> provide more information on filing Opening and Reply Comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon O'Rourke". The signature is fluid and cursive, with the first name "Shannon" and last name "O'Rourke" clearly distinguishable.

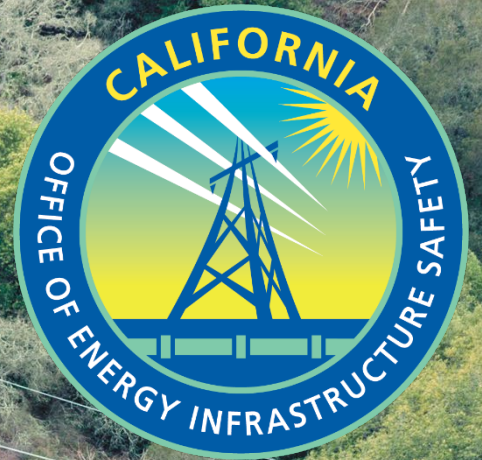
Shannon O'Rourke  
Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

Encl: Rejection and Order to Resubmit Update Bear Valley Electric Service, Inc. 2025  
Wildfire Mitigation Plan

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<sup>3</sup> Submit comments to the 2023-2025-WMPs docket via the Energy Safety e-filing system here: [2023-2025-WMPs](https://efiling.energysafety.ca.gov/Dockets.aspx?caseId=1242) (https://efiling.energysafety.ca.gov/Dockets.aspx?caseId=1242, accessed April 23, 2024).

<sup>4</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, Published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true), Section 6, pp. 10-12 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed May 3, 2024).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
**REJECTION AND ORDER TO  
RESUBMIT**

**BEAR VALLEY ELECTRIC SERVICE, INC.  
2025 WILDFIRE MITIGATION PLAN UPDATE**

May 14, 2024

# 1. Introduction

The Office of Energy Infrastructure Safety (Energy Safety) rejects Bear Valley Electric Service, Inc.'s (BVES) submission of its 2025 Wildfire Mitigation Plan Update (2025 WMP Update).<sup>1</sup>

BVES submitted its 2025 WMP Update to Energy Safety's 2023-2025 WMP docket (#2023-2025-WMPs) on April 1, 2024.<sup>2</sup> BVES's 2025 WMP Update does not conform to the requirements in Energy Safety's 2025 WMP Update Guidelines.<sup>3</sup> Consequently, Energy Safety rejects BVES's 2025 WMP Update.

BVES must provide a 2025 WMP Update submission that conforms to the requirements in Energy Safety's 2025 WMP Update Guidelines. Section 3 of this document provides instructions and deadlines for BVES's resubmission.

# 2. Non-Conforming Elements

BVES's 2025 WMP Update does not conform to the submission requirements provided in Energy Safety's 2025 WMP Update Guidelines. The following list outlines the requirements that BVES's 2025 WMP Update submission did not follow, as well as some specific examples of items BVES improperly included or omitted from its 2025 WMP Update.<sup>4</sup> In its 2025 WMP Update, an electrical corporation may not include any changes outside of the reportable updates specifically listed in the 2025 WMP Update Guidelines.<sup>5</sup> BVES included changes that fall outside the scope of reportable updates.

- a. Changes to 2024 targets, 2024 target completion dates, and 2024 expenditures are not reportable updates for the 2025 WMP Update.<sup>6</sup>

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<sup>1</sup> Pub. Util. Code, § 8386.3(a).

<sup>2</sup> [Bear Valley Electric Service 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true, accessed May 1, 2024). BVES submitted its 2025 WMP Update, without appendices, on April 1, 2024, with a title page dated April 2, 2024. BVES resubmitted its 2025 WMP Update with appendices on April 5, 2024.

<sup>3</sup> [Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan 2024, Published Feb. 2024\) \(hereafter 2025 WMP Update Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 29, 2024).

<sup>4</sup> This list is not a comprehensive list in BVES's 2025 WMP Update submission, but provides examples of each requirement not followed.

<sup>5</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 29, 2024).

<sup>6</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 29, 2024).

- i. Section 2.1 *2025 Targets or Target Completion Dates* of BVES's 2025 WMP Update includes changes to its 2024 targets for initiatives GD\_2 and GD\_5.
  - ii. Section 2.3 *Expenditures Changes* of BVES's 2025 WMP Update include changes to its 2024 expenditures for initiatives GD\_2, GD\_5, GD\_10, GD\_11, and GD\_22.
2. The electrical corporation must submit a redlined version of its 2023-2025 Base WMP showing proposed updates to the approved 2023-2025 Base WMP.<sup>7</sup> BVES included reportable updates in its redline and clean 2023-2025 Base WMP submissions that are not discussed in its 2025 WMP Update, such as:
  - a. The replacement of Wildfire Risk Reduction Model with FireSight in the redlined 2023-2025 Base WMP but not in the 2025 WMP Update in Section 1.1.
  - b. Wordsmithing, correcting perceived errors, copywrite editing, and any removal or addition of information not associated with changes in the 2025 WMP Update.
    - i. Changing its overall circuit miles unrelated to 2025 targets.
3. An electrical corporation must capture significant updates to risk models in Appendix B of the redline and clean 2023-2025 Base WMP versions.<sup>8</sup> BVES did not include risk model updates in Appendix B of the redline and clean 2023-2025 Base WMP versions but did describe this reportable update in the 2025 WMP Update.
4. An electrical corporation must report on progress required by the areas for continued improvement identified in Energy Safety's Decision on BVES's 2023-2025 Base WMP for those areas in which the required progress specified reporting in the 2025 WMP Update.<sup>9</sup> In its 2025 WMP Update, BVES did not provide complete responses to areas for continued improvement for which the 2023-2025 Base WMP Decision required reporting in BVES's 2025 WMP Update. For example, as part of area for continued improvement BVES-23-17 Energy Safety asked for documentation for weather stations<sup>10</sup> and BVES did not provide the required details its 2025 WMP Update.<sup>11</sup>

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<sup>7</sup> [2025 WMP Update Guidelines](#), p. 4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed April 29, 2024).

<sup>8</sup> [2025 WMP Update Guidelines](#), p. 4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed April 29, 2024).

<sup>9</sup> [2025 WMP Update Guidelines](#), p. 17

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed April 29, 2024).

<sup>10</sup> [Bear Valley 2023-2025 Wildfire Mitigation Plan Decision and Cover Letter](#), Section 11, pp. 80-81

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true>, accessed May 9, 2024).

<sup>11</sup> BVES indicated it had the missing information in its response to DR-001. Data Request [OEIS-P-WMP 2024-BVES-001 Q01-02](#), Question 1

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56516&shareable=true>, accessed May 9, 2024).

### 3. Conclusion and Next Steps

BVES must submit a 2025 WMP Update to Energy Safety's 2023-2025 WMP docket (#2023-2025-WMPs) that conforms to Energy Safety's 2025 WMP Update Guidelines, pursuant to the schedule below. BVES's resubmitted 2025 WMP Update will be the subsequent version of its 2025 WMP Update submission and must be named accordingly, e.g., BVES 2025 Update R1.

Opening and reply comments on BVES's resubmitted 2025 WMP Update must be provided in accordance with Energy Safety's 2023-2025 WMP Process and Evaluation Guidelines. For BVES only (not for other Group 1 electrical corporations), the schedule below supersedes the schedule published by Energy Safety on February 22, 2024.<sup>12</sup>

The schedule for this Rejection and Order to Resubmit is as follows:

BVES's Resubmitted 2025 WMP Update Due:	May 29, 2024
Opening Comments Due on BVES 2025 WMP Update:	June 10, 2024
Reply Comments Due on BVES 2025 WMP Update:	June 17, 2024
Draft Decision on BVES 2025 WMP Update Issued No Later than:	August 29, 2024

BVES's submission of a 2025 WMP Update that conforms with the submission instructions in Energy Safety's 2025 WMP Update Guidelines does not guarantee the approval of BVES's 2025 WMP Update.

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<sup>12</sup> [2025 WMP Updated Letter and Schedule](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56334&shareable=true>, accessed May 7, 2024).

# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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