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Via Electronic Mail

May 17, 2024

Caroline Thomas Jacobs, Director
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Docket #2023-2025-WMPs

Subject: Response by Bear Valley Electric Service, Inc. to the California Department of Fish and Wildlife and Public Advocates office at the California Public Utilities Commission comments on Bear Valley’s 2025 Wildfire Mitigation Plan Update

Dear Director Thomas Jacobs:

Pursuant to the Office of Energy Infrastructure Safety (“Energy Safety”) 2025 Wildfire Mitigation Plan Update Guidelines (January 2024), and Revised 2025 Wildfire Mitigation Plan Update Schedule of February 22, 2024, Bear Valley Electric Service, Inc. (“BVES” or “Bear Valley”) submits its responses to the comments made by the California Department of Fish and Wildlife (“CDFW”), and Public Advocates Office at the California Public Utilities Commission (“Cal Advocates”) regarding Bear Valley’s 2025 Wildfire Mitigation Plan (“WMP” or “Plan”) Update.

Bear Valley recognizes the benefits of an open and transparent WMP approval process and appreciates the external reviews and comments to its WMP. Bear Valley would like to re-emphasize its open invitation to the Cal Advocates and California Department of Fish and Wildlife to visit Big Bear Lake to better understand the unique nature and condition of the BVES service territory and the inherent risks in our operations/service territory, our wildfire mitigation efforts, and the constraints BVES faces.

I. CDFW's Comments and Responses

CDFW Comment #1: CDFW notes that BVES did not meet the requirement to discuss its procedures/processes to ensure environmental compliance. CDFW makes this assessment because in its view, BVES did not adequately describe its detailed process to assess potential environmental impacts and determine which environmental laws, regulations, or permits are applicable for specific Plan activities. Additionally, CDFW notes that BVES did not discuss if or when consultation with environmental regulatory agencies will occur when planning or implementing Plan activities. CDFW makes this assessment because in its view, BVES did not include a defined timeframe for consultation.

BVES Response: BVES ensures compliance with all environmental laws and requirements for its planned projects, including WMP initiatives. The company diligently seeks the necessary permits and collaborates with relevant agencies during project development. Notably, BVES's top-priority WMP project, the Radford Line Replacement Project, underwent a rigorous three-year permitting process with the United States Forest Service ("USFS"). Throughout this lengthy process, BVES meticulously followed the USFS requirements and maintained close communication to safeguard the USFS lands.

BVES adheres to the environmental planning process outlined by CDFW in its comments. While BVES does not specify a fixed consultation timeframe, it engages an environmental law and requirements expert during the initial planning stages. This ensures compliance with relevant environmental laws and facilitates proper consultations and permitting requests. Furthermore, this early review enables BVES to proactively address any potential conflicts, such as modifying the project design (e.g., altering the circuit route).

In light of CDFW's constructive comments, BVES will include more detail on Environmental Compliance and Permitting (Section 5.4.5) in its 2026-2028 WMP. Additionally, Bear Valley agrees with CDFW's recommendation regarding "Early consultation with CDFW by BVES's environmental and planning staff and early completion of all documentation necessary for CDFW's discretionary review of activities covered under the Plan."

CDFW Comment #2: CDFW notes that BVES did not include any environmental laws and regulations associated with CDFW's discretionary approval of Plan activities.

BVES Response: BVES completed Table 5-6 Relevant State and Federal Environmental Laws, Regulations, and Permitting Requirements for Implementing the WMP specifically for the projects included in its WMP. BVES recognizes CDFW's discretionary approval within CDFW's Inland Desert Region and will ensure appropriate consultations are made for applicable plan activities.

In light of CDFW's constructive comments, BVES will include more detail to its list of Relevant State and Federal Environmental Laws, Regulations, and Permitting Requirements for Implementing the WMP (Table 5-6) in its 2026-2028 WMP.

II. Cal Advocates' Comments and Responses

Cal Advocates Item #1: Energy Safety should require BVES to confirm contact information for medical-baseline customers, and verify this information every two years.

BVES Response: Cal Advocates recommends that “Energy Safety should require BVES to confirm contact information for medical-baseline customers, and verify this information every two years.” Bear Valley does not oppose verifying medical-baseline customer contact information at least every two years and, in fact, commits to doing so.

Cal Advocates goes on to recommend “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 recommendation is out of scope for “reportable updates” per the 2025 Wildfire Mitigation Plan Update Guidelines (January 2024). Therefore, Energy Safety should reject this recommendation.

Bear Valley will include medical-baseline customer verification in its 2026-2028 WMP.

Bear Valley challenges Cal Advocates’ assumption that BVES, having not yet implemented a PSPS (Public Safety Power Shutoff), might encounter difficulties in notifying its customers ahead of such an event. BVES has diligently trained and prepared for PSPS execution, following CPUC (California Public Utilities Commission) guidance. Additionally, BVES has analyzed the lessons learned from PSPS events conducted by other utilities. Cal Advocates’ statements lack evidence or supporting data in this context.

Cal Advocates Item #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.

BVES Response: Cal Advocates seems to believe BVES does not know the circuits each of its medical-baseline customers are on. This is simply not true. BVES has the circuit and geolocation of each medical-baseline customer in its Customer Information System.

Cal Advocates goes on to recommend “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.” As stated in the previous comment, this recommendation is out of scope for “reportable updates” per the 2025 Wildfire Mitigation Plan Update Guidelines (January 2024). Therefore, Energy Safety should reject this recommendation.

Bear Valley will include medical-baseline customer verification in its 2026-2028 WMP.

Cal Advocates Item #3: Energy Safety should require BVES to update its PSPS procedures to include thresholds based on its new fire potential index (FPI).

BVES Response: Cal Advocates recommends that “Energy Safety should require BVES to update its PSPS procedures to include thresholds based on its new fire potential index.” Cal

Advocates then goes on to state “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.”

Bear Valley is in the process of updating its internal PSPS procedures to include thresholds based on its new fire potential index and expects to have this action completed no later than June 15, 2024, if not sooner.

However, Cal Advocates recommendation is out of scope for “reportable updates” per the 2025 Wildfire Mitigation Plan Update Guidelines (January 2024). Therefore, Energy Safety should reject this recommendation.

Cal Advocates Item #4: Energy Safety should require BVES to implement a more thorough quality control program for asset inspections.

BVES Response: Bear Valley conducts various annual asset inspections for the entire overhead distribution system, including GO-165 Detailed and Patrol Inspections, third-party ground patrols, LiDAR surveys, UAV photography/videography, and UAV thermography. BVES meticulously cross-checks the inspection results to ensure the quality of each type of assessment. If any discrepancies arise between inspection methods, the inspector and/or the inspection methodology undergo investigation. Any potential findings discovered during these inspections are promptly investigated and remediated if necessary. While BVES does not oppose the essence of Cal Advocates’ recommendation, Energy Safety should reject it, considering that Bear Valley’s streamlined and cost-effective QC process yields superior results.

Cal Advocates Item #5: Energy Safety should require BVES to develop a program of fast-trip settings.

BVES Response: Bear Valley currently does not use fast trip settings. Bear Valley uses fast curve trip settings, which are different from fast trip settings. The seasonal change to device settings is only conducted with regard to reclosing, not device trip settings. In the winter, automatic reclosing is permitted (devices are placed in “Automatic” mode) and in the higher fire threat periods reclosing is not permitted (devices are set to “Non-reclosing” mode).

Cal Advocates states that “Notably, SDG&E has been using these “fast-trip” (Sensitive Relay Profile) settings since 2011 and has never experienced an ignition on a fast-trip-enabled circuit despite 90 faults.” Cal Advocates infers that SDG&E’s no ignitions record is entirely due to its “fast trip” setting program giving no credit to SDG&E’s other initiatives aimed at reducing the probability of ignitions. Such logic is clearly flawed. Furthermore, Cal Advocates simply ignores the fact that Bear Valley’s entire service area is in the HFTD and Bear Valley has not had a reportable ignition in over 20 years. Bear Valley switched to fast curve trip settings in 1994.

Bear Valley is in the process of engaging an expert consultant to review its protective settings and make recommendations on steps Bear Valley should take to further mitigate ignition risk. Bear Valley will update the status of its settings policy in its 2026-2028 WMP.

Cal Advocates Item #6: Energy Safety should direct BVES to collaborate with other utilities to learn from the successes and pitfalls of their fast-trip programs.

BVES Response: Bear Valley has had recent detailed discussions with PG&E subject matter experts in November 10, 2023, to learn from their fast-trip settings program. Bear Valley is having the existing fast curve trip settings evaluated by an independent expert consultant. The contractor will also evaluate the use of fast trip settings and recommend the best trip setting arrangement for Bear Valley. Bear Valley is already performing what Cal Advocates recommends.

Cal Advocates Item #7: Energy Safety should monitor BVES's vegetation management program to ensure that it is sufficient.

BVES Response: Bear Valley's vegetation management program already undergoes monitoring by Energy Safety at various levels. The program receives approval during the WMP (Wildfire Mitigation Plan) process. Progress is assessed through the Quarterly Data Report and Quarterly Notification Letter procedures. Additionally, the WMP Annual Report on Compliance and the WMP Independent Evaluator Report provide Energy Safety with feedback on Bear Valley's vegetation management efforts. Energy Safety conducts an annual audit of BVES's Substantial Vegetation Management Work and performs independent quality control inspections within Bear Valley's service area. Despite these comprehensive measures, Bear Valley is puzzled by Cal Advocates' request for additional actions from Energy Safety.

Cal Advocates Item #8: Energy Safety should examine if there are lessons to be learned from comparing BVES and PG&E's vegetation management cycles.

BVES Response: Bear Valley does not oppose Cal Advocates recommendation. Bear Valley has already evaluated PG&E's vegetation management plan. Bear Valley has determined that its current vegetation management plan best serve the unique features of Bear Valley's service area. In addition to the three-year routine cycle of the valley, Bear Valley also performs many types of annual vegetation inspections for the entire overhead distribution system, including GO-165 Detailed and Patrol Inspections, third-party ground patrols, LiDAR, UAV photography/videography, and satellite imagery. BVES cross-checks the results of these inspection findings to verify the quality of each type of inspection. Any potential concerns found during any type of inspection will be investigated and quickly remediated, if necessary.

Cal Advocates Item #9: Energy Safety should require BVES to remove its solar and storage projects from its WMP.

BVES Response: Cal Advocates recommends that “Energy Safety should require BVES to remove its solar and storage projects from its WMP.” Bear Valley opposes this recommendation since it leaves Bear Valley’s customers vulnerable to Southern California Edison (SCE)-invoked PSPS events. Energy Safety should reject Cal Advocates’ recommendation.

To begin, Cal Advocates assumes a 20% capacity factor for the proposed solar generating facility. However, the actual capacity factor is 32.06% for the solar facility equipped with single-axis tracker bi-facial panels. Following Cal Advocates’ approach, this would add 1.6 MW to the existing 8.4 MW from the Bear Valley Power Plant (BVPP). While this capacity increase is relatively small, it could effectively prevent the need to curtail power to non-interruptible customers during PSPS (Public Safety Power Shutoff) events when all SCE supply lines are de-energized.

However, this simplistic approach overlooks the intricacies of a utility’s load curve. At Bear Valley, demand typically exhibits two peaks: one in the morning and a higher peak in the evening. Conversely, load after 10 pm and through the night remains consistently low. Leveraging solar production, which is highest during daylight hours and zero at night, in conjunction with the power plant and battery, Bear Valley would be able to readily handle the morning and evening peaks as well as the remaining low-load periods. Consequently, this integrated approach eliminates the necessity for rolling blackouts.

Furthermore, the storage (battery) project would obviate the necessity for conducting a black start on the Bear Valley Power Plant (BVPP) in the event of an SCE supply line loss. The BVPP is specifically designed and permitted as a peaking plant, typically operated to handle peak loads. However, during a loss of SCE power lines, the BVPP would need to be initiated in a “black start” mode. Executing black starts poses challenges, risks equipment damage, and consumes significant time. For instance, the switch lineup alone can take several hours to configure.

By directly tying the battery project to the sub-transmission system, the need for a black start on the BVPP is eliminated. In fact, with the battery in place, the BVPP could be swiftly placed into service, carrying load within minutes.

Cal Advocates states in Section III.A to its comments that “Power outages can be life-threatening for some customers.” Despite this strong statement, which Bear Valley agrees with, Cal Advocates’ recommendation “to remove its solar and storage projects from its WMP” would leave all of Bear Valley’s customers, including vulnerable customers, without a “Plan B” in the event of an SCE-invoked PSPS event impacting Bear Valley’s power supply lines. While the proposed solar and storage projects clearly increase renewable energy, they also have significant value in making Bear Valley’s grid essentially a micro-grid capable of powering its non-interruptible customers in the event SCE executes a PSPS event resulting in the de-energization of power supply lines to Bear Valley.

Cal Advocates Item #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.

BVES Response: As stated in Item #9, Bear Valley opposes this recommendation since it leaves Bear Valley's customers vulnerable to SCE-invoked PSPS events. Energy Safety should reject Cal Advocates' recommendation.

III. Conclusion

Bear Valley acknowledges and has addressed the comments provided by CDFW and Cal Advocates, offering additional clarity. BVES's Wildfire Mitigation Plan (WMP) and its associated documentation remain adaptable and subject to continuous improvement in response to the evolving wildfire mitigation landscape. As our understanding of mitigation efforts and regulatory requirements improves, BVES will further strengthen its WMP programs, particularly in areas highlighted by public feedback. We are committed to addressing any identified issues in the upcoming WMP cycle. Additionally, BVES welcomes constructive discussions with interested parties and stakeholders regarding WMP matters.

Sincerely,

/s/ Paul Marconi

Paul Marconi

President, Treasurer, & Secretary

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