

OFFICE OF ENERGY INFRASTRUCTURE SAFETY 715 P Street, 20th Floor | Sacramento, CA 95814 916.902.6000 | www.energysafety.ca.gov

Caroline Thomas Jacobs, Director

July 15, 2024

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

Subject: Notice on Errata for Bear Valley Electric Service, Inc. 2025 Wildfire Mitigation

Plan Update

Mr. Marconi:

Bear Valley Electric Service, Inc. (BVES) submitted its 2025 Wildfire Mitigation Plan Update (2025 WMP Update) and revised 2023-2025 Base Wildfire Mitigation Plan (2023-2025 Base WMP) (redlined and clean versions) to the Office of Energy Infrastructure Safety's (Energy Safety) 2023-2025 WMPs docket on April 1, 2024. BVES submitted a revision per Energy Safety's Rejection and Order to Resubmit¹ to the same docket on May 29, 2024.²

Request for Errata

Energy Safety reviewed BVES's submissions and identified substantive and non-substantive errors for BVES to correct, listed in Appendix A.

¹ <u>Rejection and Order to Resubmit for Bear Valley Electric Service, Inc 2025 Wildfire Mitigation Plan Update</u> (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56676&shareable=true, accessed June 28, 2024).

² Bear Valley Electric Service 2025 Wildfire Mitigation Plan Update Revision 1, Bear Valley Electric Service 2023-2025 Wildfire Mitigation Plan 2025 Revision 1 (redlined), Bear Valley Electric Service 2023-2025 Wildfire Mitigation Plan 2025 Revision 1 (clean) (May 29, 2024) (hereafter BVES 2025 WMP Update R1, BVES 2023-2025 Base WMP R1 (redlined), and BVES 2023-2025 Base WMP R1 (clean), respectively)

⁽https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56740&shareable=true, accessed July 1, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56742&shareable=true, accessed July 1, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56741&shareable=true, accessed July 1, 2024).

Notice on Errata for BVES 2025 WMP Update

BVES must revise its 2025 WMP Update R1 and 2023-2025 Base WMP R1 (both redlined and clean versions) to correct the substantive and non-substantive errors identified in Appendix A. BVES must submit its newly Revised 2025 WMP Update and Revised 2023-2025 Base WMP to Energy Safety's 2023-2025 WMPs docket by July 22, 2024.

BVES must not make any changes to its WMP beyond corrections to the errors listed in this request. 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 WMP Update Revision 2.

Comments on BVES's resubmitted 2025 WMP Update must be provided in accordance with Energy Safety's Revised 2023-2025 WMP Process and Evaluation Guidelines.³ For BVES only (not for other Group 1 electrical corporations), the schedule below supersedes the revised schedule published by Energy Safety on June 21, 2024.⁴

The schedule for this Notice on Errata is as follows:

Revised BVES 2025 WMP Update Due July 22, 2024 Comments on Revised BVES 2025 WMP Update Due August 5, 2024 Draft Decision on BVES 2025 WMP Update issued no later than August 31, 2024

Sincerely,

Shannon O'Rourke

Deputy Director | Electrical Infrastructure Directorate

Office of Energy Infrastructure Safety

³ 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, accessed July 2, 2024).

⁴ <u>Revised Schedule for 2025 Wildfire Mitigation Plan Update -Group 1 Electrical Corporations</u> (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56875&shareable=true, accessed June 28, 2024).

Table 1. Substantive Errors in BVES 2025 WMP Update

Section	Document page number/PDF page number	Correction or Clarification
2.1 2025 Targets or Target Completion Dates	pp. 6-8/8-10 2025 WMP Update R1 ⁵	In its 2025 WMP Update R1, in the Section 2.3 Expenditures Changes table, BVES listed the"2025 Percent Change" for its GD_10 Bear Valley Solar Project (Microgrids) initiative as 100% without providing adjustments to 2025 targets. BVES must change the target table in Section 2.1 in its Revised 2025 WMP Update to include the new target provided in the BVES revised response to Data Request OEIS-P-WMP_2024-BVES-006, Question 1.6 BVES must also change Table 8-3 "Grid Design, Operations, and Maintenance Targets by Year" in its Revised 2023-2025 Base WMP (redlined and clean) to reflect the new targets.
2.1 2025 Targets or Target Completion Dates	pp. 6-8/8-10 2025 WMP Update R1	In its 2025 WMP Update R1, in the Section 2.3 Expenditures Changes table, BVES listed the"2025 Percent Change" for its GD_11 Energy Storage Project (Microgrids) initiative as 100% without providing adjustments to 2025 targets. BVES must change the target table in Section 2.1 in its Revised 2025 WMP Update to include the new target provided in the BVES revised response to Data Request OEIS-P-WMP_2024-BVES-006, Question 1. BVES must also change Table 8-3 "Grid Design, Operations, and Maintenance Targets by Year" in its Revised 2023-2025 Base WMP (redlined and clean) to reflect the new targets.

⁵ BVES 2025 WMP Update R1 (May 29, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56740&shareable=true, accessed July 2, 2024).

⁶ <u>Data Request OEIS-P-WMP_2024-BVES-006</u>, Question 1, (BVES revised response)

⁽https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56943&shareable=true, accessed July 2, 2024).

Section	Document page number/PDF page number	Correction or Clarification
2.1 2025 Targets or Target Completion Dates	pp. 6-8/8-10 2025 WMP Update R1	In its 2025 WMP Update R1, in the Section 2.3 Expenditures Changes table, BVES listed the "2025 Percent Change" for its GD_23 Lake Substation Project initiative as 100% without providing adjustments to 2025 targets. BVES must change the target table in Section 2.1 in its Revised 2025 WMP Update to include the new target provided in the BVES revised response to Data Request OEIS-P-WMP_2024-BVES-006, Question 1. BVES must also change Table 8-3 "Grid Design, Operations, and Maintenance Targets by Year" in its Revised 2023-2025 Base WMP (redlined and clean) to reflect the new targets.
2.1 2025 Targets or Target Completion Dates	pp. 6-8/8-10 2025 WMP Update R1	In its 2025 WMP Update R1, in the Section 2.3 Expenditures Changes table, BVES listed the "2025 Percent Change" for its GD_24 Village Substation Project initiative as 100% without providing adjustments to 2025 targets. BVES must change the target table in Section 2.1 in its Revised 2025 WMP Update to include the new target provided in the BVES revised response to Data Request OEIS-P-WMP_2024-BVES-006, Question 1. BVES must also change Table 8-3 "Grid Design, Operations, and Maintenance Targets by Year" in its Revised 2023-2025 Base WMP (redlined and clean) to reflect the new targets.

APPENDIX A: Substantive and Non-Substantive Errors in BVES 2025 WMP Update and WMP

Section	Document page number/PDF page number	Correction or Clarification
2.2 Initiative Objectives	pp. 6-8/8-10 2025 WMP Update R1	In its 2025 WMP Update R1, in the Section 2.3 Expenditures Changes table, BVES listed the "2025 Percent Change" for its GD_10 Bear Valley Solar Project (Microgrids) initiative as 100% without providing adjustments to 2025 objectives. BVES must change the objective table in Section 2.2 its Revised 2025 WMP Update to include the new objectives provided in the BVES revised response to Data Request OEIS-P-WMP_2024-BVES-006 response, Question 2. BVES must also change Table 8-2 "Grid Design, Operations, and Maintenance Objectives (10-Year Plan)" in its Revised 2023-2025 Base WMP (redlined and clean) to reflect the new objectives.
2.2 Initiative Objectives	pp. 6-8/8-10 2025 WMP Update R1	In its 2025 WMP Update R1, in the Section 2.3 Expenditures Changes table, BVES listed the "2025 Percent Change" for its GD_11 Energy Storage Project initiative as 100% without providing adjustments to 2025 objectives. BVES must change the objective table in Section 2.2 its Revised 2025 WMP Update to include the new objectives provided in the BVES revised response to Data Request OEIS-P-WMP_2024-BVES-006 response, Question 2. BVES must also change Table 8-2 "Grid Design, Operations, and Maintenance Objectives (10-Year Plan)" in its Revised 2023-2025 Base WMP (redlined and clean) to reflect the new objectives.

APPENDIX A: Substantive and Non-Substantive Errors in BVES 2025 WMP Update and WMP

Section	Document page number/PDF page number	Correction or Clarification
2.3 Expenditure Change	p. 7-8/9-10 2025 WMP Update R1	In its 2025 WMP Update R1, in the Section 2.3 Expenditures Changes table, BVES listed a 100% change in column "2025 Percent Change" for its GD-10 Bear Valley Solar Project, GD_11 Energy Storage Project, and GD_22 Maltby Substation Project without providing justifications for the changes. BVES must provide justifications for the expenditure changes in Section 2.3 of its Revised 2025 WMP Update as listed in the BVES response to Data Request OEIS-P-WMP_2024-BVES-003, Question 3.7

⁷ <u>Data Request OEIS-P-WMP_2024-BVES-003</u>, Question 2 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56771&shareable=true, accessed July 2, 2024).

APPENDIX A: Substantive and Non-Substantive Errors in BVES 2025 WMP Update and WMP

Table 2. Non-Substantive Errors in BVES 2025 WMP Update

Section	Document page number/PDF page number	Correction or Clarification
4. New or Discontinued Programs	p. 9/12 2025 WMP Update R1 p. 216/224 2023- 2025 Base WMP R1 (redlined) ⁸ p. 211/220 2023- 2025 Base WMP R1 (clean) ⁹	In Section 4 New and Discontinued Programs of its 2025 WMP Update R1, BVES stated, "AiDash software uses satellite imagining [sic] providing" instead of, "AiDash software uses satellite imaging providing"BVES made the same error in Section 8.2.2.7 of its 2023-2025 Base WMP R1. BVES must change "imagining" to "imaging" in its Revised 2025 WMP Update and in Section 8.2.2.7 of the revised 2023-2025 Base WMP (redlined and clean).
8.1.1.2, Table 8-3	p. 128/136 2023- 2025 Base WMP R1 (redlined) p. 126/134 2023- 2025 Base WMP R1 (clean)	In Table 8-3 "Grid Design, Operations, and Maintenance Targets by Year" of the 2023-2025 Base WMP R1, Section 8.1.1.2, initiatives GD_23 and GD_24 contained the following footnotes: "6 The program completion has been moved to 2026. Details about the change can be found in the 2025 WMP Update." "7 The program completion has been moved to 2027. Details about the change can be found in the 2025 WMP Update." BVES must remove the footnotes in its Revised 2023-2025 Base WMP (redlined and clean).

⁸ BVES 2023-2025 Base WMP R1 (redlined) (May 29, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56742&shareable=true, July 2, 2024).

⁹ BVES 2023-2025 Base WMP R1 (clean) (May 29, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56741&shareable=true, accessed July 10, 2024).

Section	Document page number/PDF page number	Correction or Clarification
Appendices F - J	Appendices F-J 2023-2025 Base WMP (redlined)	In the 2023-2025 WMP R1 redlined version, the appendix pages titled F through J are blank. BVES must add the content associated with the appendix title to its Revised 2023-2025 Base WMP (redlined), as provided in its 2023-2025 Base WMP R1 (clean): Appendix F. BVES Emergency Response and Disaster Plan Appendix G. BVES Vegetation Management Policy Appendix H. BVES Quality Management Plan Appendix I. BVES PSPS Procedure Appendix J. BVES AFN Plan