



FINAL INDEPENDENT EVALUATOR 2023 ANNUAL REPORT ON COMPLIANCE

JUNE 30, 2024



BUREAU
VERITAS



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DISCLAIMER

This report has been compiled through the process of observation and review of documents provided by the electric service provider named herein. The Office of Energy Infrastructure Safety (“Energy Safety”) instituted the requirement for an independent evaluation of electric utility providers Wildfire Mitigation Plans (“WMP”). Bureau Veritas is not the designer, implementer, or owner of the WMP and is not responsible for its content, implementation and/or any liabilities, obligations or responsibilities arising therein.

The report reflects only those conditions and practices which could be ascertained through observation at the time of evaluation. This report is limited to those items specifically identified herein. The report is not intended to validate those dangers, hazards and/or exposures that are or are not present. Bureau Veritas shall only be responsible for the performance of the services identified or defined in its specific scope of services.

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1. EXECUTIVE SUMMARY

Derived from the devastating wildfires of the past and the present, we continue to learn more about what is our task to ensure the safety of California lands as it relates to the presence of electrical infrastructure within the wildland. California Public Utilities Commission (CPUC) opened Rulemaking 18-10-007 to provide guidance on the Investor-Owned Utilities (IOU) Wildfire Mitigation Plans (WMPs). The WMP's are developed to span three (3) years, with the first cycle of WMP independent evaluation starting in 2020.

The 2023 year of WMP is the 2nd cycle of the three (3) year planning. During the final evaluation of the first 3-year plan which ended in 2022 Bear Valley did not experience any ignition events or conditions that would trigger a PSPS situation. Bear Valley's 2023 to 2025 plan builds on the previous cycle by incorporating its grid hardening, risk assessment and prioritization and improving situational awareness and weather monitoring capabilities. These, along with existing mitigation measures built upon the understanding and foundation that natural resource management is what maintains its facilities. Many of these existing programs include comprehensive monitoring and data collection, including but not limited to wildfire cameras, in-depth Quality Assessment and Quality Control (QA/QC) programs, asset inspections and situational awareness. Overall, it was observed in the previous year that reportable ignitions in the High Fire Threat Districts (HFTD) and High Fire Risk Areas (HFRA) within Bear Valley's service area was reduced.

This Independent Evaluator (IE) Annual Report of Compliance is an assessment of Bear Valley's 2nd cycle plan that began in 2023 and extends to 2025. This report provides a review of the WMP initiatives demonstrated in the 2023 plan and accounting for Bear Valley's performance in meeting with their commitment of objective targets including specific quantifiable or qualitative performance goals and targets, verification of QA/QC program implementation, process, and results; and the distribution of funding to initiatives so described within the WMP.

Pursuant to P.U. Code Section 8386.3(c)(2)(B)(i), (ii), (iii), (iv), Bureau Veritas North America, Inc. (BVNA) has been selected as the IE to review and assess Bear Valley's 2023 WMP in its entirety. This report will outline BVNA findings and results for review. The Office of Energy Infrastructure and Safety (Energy Safety) Independent Evaluator List for 2023 Wildfire Mitigation Plans document dated February 27th, 2024, and reference to Public Utilities Code section 8386.3(c)(2)(A) included BVNA in the list of qualified IEs. In conformance with Energy Safety's requirements, Bear Valley Electric Service, Inc. executed a contract with BVNA to provide the IE assessment which include the IE responsibilities outlined in the Public Utilities Code section 8386.3(c)(5)(C) for performance of the following tasks:

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- Task 1 – Consult with Energy Safety on compliance assurance auditing that will be performed,
- Task 2 – Perform compliance assurance auditing, including field inspections,
- Task 3 – Draft and provide to Energy Safety a report on audit findings, including deficiencies of underfunded WMP activities
- Task 4 – Draft and provide to Energy Safety a report on deficiencies of electrical corporations, and
- Task 5 – Track and report deficiencies of audit findings.

Docket Title: 2023 to 2025 Electrical Corporation Wildfire Mitigation Plans Docket #; 2023-2025-WMPs produced on January 8, 2024, for Bear Valley Electric Service Inc. 2023 WMP R2 update and the requirements of the Public Utilities Code (PU Code); Bureau Veritas North America, Inc. (BVNA), in partnership with C2 Group, have reviewed Bear Valley's 2023 WMP.

Key Findings

Bear Valley Electric Service's programs are evolving as their understanding of the wildfire threat and mitigation opportunities improve. BVES has continued to improve and develop programs to reduce fire risks in their territory and the impacts of PSPS events on its customers. The BVES 2023 WMP provided a wide-ranging focus on improving all 10 categories of their WMP initiatives from risk assessment and mapping, grid design and system hardening to community outreach.

The IE has highlighted a few key findings below.

- **8.1.2.1 - GD_2 - Radford Line Replacement Project**
BVES committed to replace 2.7 circuit miles of bare wire with a high-performance covered conductor on the Radford 34 kV sub-transmission line. No work was performed on this initiative in 2023 due to a delay in US Forest Service permitting approval reported in BVES's 2023 ARC.
- **8.1.2.3 - GD_5 - Radford Line Replacement Project**
BVES committed to replace 70 existing poles with fire resistant (ductile iron) poles as a part of the Radford Line Replacement Project. No work was performed on this initiative in 2023 due to a delay in US Forest Service permitting approval reported in BVES's 2023 ARC.

- **8.1.2.10 - GD_19 - Tree Attachment Removal Project**

BVES committed to removing 100 tree attachments in 2023, and BVES's goal was met and exceeded by 14 removals, removing a total of 114 tree attachments. The IE randomly sampled 23 tree attachment removal locations to verify tree attachment removals. During the IE field team's inspection of the locations with the initiative, a discrepancy was observed in one (1) location (4.3% sampled locations) where the tree attachment had not been removed.

- **8.3.2 – SAF_4 – Advance Weather Monitoring and Weather Stations**

BVES committed to complete ongoing monitoring and maintenance for weather stations that have been installed. The IE reviewed the maintenance documentation for the 20 weather stations to verify the initiative. In the IE team's review of the initiative a discrepancy was observed in one (1) location (5% reviewed locations) where the weather station was identified as offline as of 6/22/2022 awaiting delivery of an interface module.

- **8.5.2 – COE_1 – Public Outreach and Education Awareness**

BVES has a goal of continued engagement with local stakeholders to prepare for and respond to fire-related events throughout their territory. The initiative also provided support of the Access and Functional Needs population and presented many events in multilingual formats. BVES targeted a goal of 360 outreach events in the 2023 WMP and reported the actual number of events at 829. The IE reviewed presentation documentation and the multiple ways in which BVES reached its target audience.

- **8.1.2.8 – GD_15 – Fuse TripSaver Automation**

BVES improved their SCADA network with this initiative by installing 10 fuse TripSavers for a more reliable transmission and distribution network. The annual target goal of 10 installations was exceeded by 2 as BVES provided a list of 12 installations. The IE reviewed installation reports that included locations and installation photos.

2. INTRODUCTION

As California continues to suffer as a threat to the risk of wildfires and the devastating consequences as a result, California Department of Forestry and Fire Protection (CALFIRE) has indicated that more than ever vigilant tactics are needed for years to come due to stressed forests from droughts, bark beetle infestations, forest management, and other impacts on wildfire.

Bear Valley Electric Service, Inc. is a Subsidiary of American States Water Company and is often referred to as BVES, or Bear Valley. Bear Valley has a 32 sq. mi. service territory comprised of a mountain community in Southern California, located in the San Bernardino mountains, 80 miles east of Los Angeles surrounding Big Bear City and Big Bear Lake. The service area is above 3,000 with approximately 90% in Tier 2 HFTD and 10% in Tier 3 HFTD is considered very dry combined with heavy vegetation.

Bear Valley has 50 employees, and 24,691 customers. There are 13 substations and a total of 9,156 poles, along with 267.1 total circuit miles with 206.7 being overhead and 60.4 being underground.

Over the course of the 3-year cycle from 2023-2025 of the WMP, Bear Valley has the primary objective to continue to reduce the risk of wildfires through continuing initiatives such as grid hardening, risk assessment and prioritization, situational awareness, and weather monitoring. With goals and continual improvements in technology to assist in modeling where needed, Bear Valley's commitment to wildfire safety, the IE report intends to demonstrate compliance with initiatives as outlined by Energy Safety.

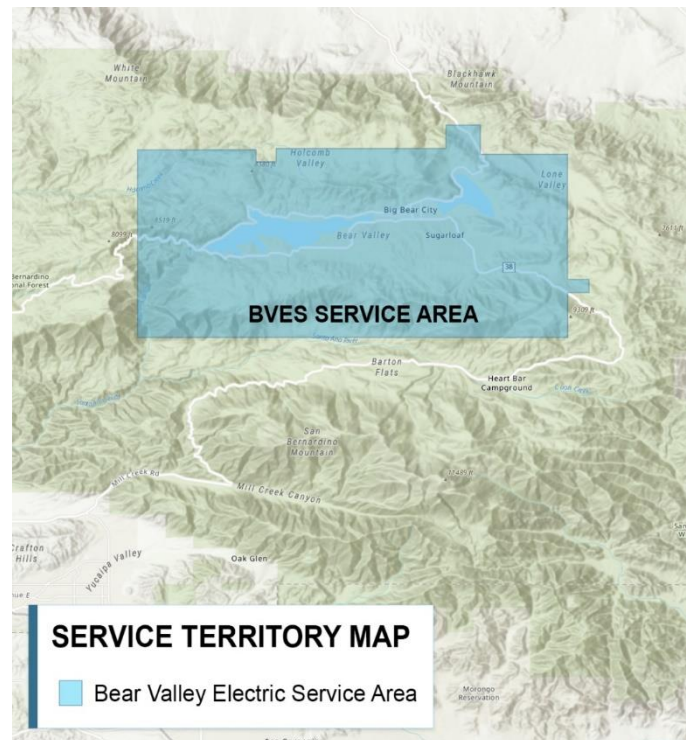


Figure 1: Map of Bear Valley Service Territory

3. INDEPENDENT EVALUATOR REVIEW OF COMPLIANCE

BVNA and the C2 Group have been chosen as Bear Valley's IE and is tasked with evaluating Bear Valley's 2023-2025 WMP. The following assessment outline is based upon Bear Valley's completion of proposed initiatives, distribution of funding, and verification of quality assurance and quality control program depicted during 2023 yearly progress. The overall approach to verify compliance included the review and assessment of the multiple WMP activities through data requests, Subject Matter Expert (SME) interviews, review of publicly available documents, and conducting field assessments within Bear Valley's service area to documented and validated aspects detailed and outlined in Bear Valley's WMP progress for 2023.

The commencement of the evaluation began with the Energy Safety kick-off meeting, an introduction meeting with Bear Valley representatives, BVNA/C2 staff, and assigned Energy Safety Staff. Key elements of the introductory meeting were the process and protocols of communication and documentation; and identification of the individuals who are responsible for receiving requests from the IE. The IE then initiated a review of Bear Valley's 2023 WMP along with publicly available documents as listed in the Appendices to identify Bear Valley's statements detailed within the 2023 WMP goals. Bear Valley's WMP elements and their fulfillment of commitments, initiatives, and metrics are included in the QA/QC provisions outlined within the WMP.

BVNA's understanding of collected utility strategies demonstrated throughout the state are summarized below:

1. **Inspection and maintenance of distribution, transmission, and substation assets**, including conducting system patrols and ground inspections using technological inspection tools, managing predictive and electrical preventative maintenance, conducting vegetation inspections and management, vulnerability detection such as Light Detection and Ranging (LiDAR) inspection, and geospatial and topography identification and geographic information system (GIS) mapping data. A key component is identifying collected data elements through each program and understanding how that data is used and shared to improve utility practices.
2. **Vegetation management**, including routine preventative vegetation maintenance; corrective vegetative management and off-cycle tree work; emergency vegetation clearance, prioritized for portions of the service territory in Tier 2 and 3 HFTD; quality control processes; and resource protection plan, including animal and avian mitigation programs. Enhanced Vegetation Management (EVM) with enhanced inspections, aims to keep all aspects of trees away from power lines and to prescribe minimum clearances that exceed state standards. EVM implements frequencies of

inspection beyond the routine patrols to address dead, diseased or dying trees from power lines where they can do no harm.

3. **System hardening** includes pole replacement, non-expulsion equipment, advanced fuses, tree attachment removal, less flammable transformer oil, covered wire and wire wrap, and undergrounding where it is supported by a cost benefit analysis.
4. **Operational practices**, including communications and executing plans under varying degrees of wildfire risk. Plans to deactivate automatic reclosers, de-energization of “at risk” area power lines based on the type of facility (overhead bare conductions, high voltage, etc.), tree and vegetation density, available dry fuel, and other factors that make specific locations vulnerable to wildfire risk.
5. **Situational awareness** includes obtaining information from devices and sensors on the actual system, weather, and other wildfire conductivity conditions and two-way communication with agencies and key personnel. Application of risk informed, and data supported decision making. Programs such as online feeds and websites such as the National Fire Danger Rating System are utilized. Situational awareness should help achieve a shared understanding of actual conditions and serve to improve collaborative planning and decision-making.
6. **De-Energization** actions triggered and prioritized by forecasted extreme fire weather conditions: imminent extreme fire weather conditions; validated extreme fire weather conditions; and plans for re-energization when weather subsides to safe levels. Manual or automatic capabilities exist for implementation.
7. **Advanced Technologies** include Distribution Fault Anticipation technology, tree growth regulators, pulse control fault interrupters, oblique and hyperspectral imagery, advanced transformer fluids, advanced LiDAR, and advanced Supervisory Control and Data Acquisition (SCADA) to reduce electrical ignition while also helping to mitigate power outages and equipment damage.
8. **Emergency Preparedness, Outreach, and Response** communications before, during, and after emergencies, including but not limited to engaging with key stakeholders that include critical facilities and served customers, local governments, critical agencies such as the California Department of Forestry and Fire Protection (CAL FIRE), local law enforcement agencies and other first responders, hospitals, local emergency planning committees, other utility providers, and California Independent System Operators. Coordination agreements such as Mutual Aid or Assistance should be leveraged. A community outreach plan should inform and engage first responders, local leaders, land managers, business owners, and others.

For those activities described in the WMP but not available within the publicly available records, BVNA’s team of evaluators submitted data requests and conducted SME interviews to verify activities stated within the 2023 initiative list for the 2023-2025 WMP (See Appendix C for Data Requests Submitted and Responses). Along with the document

analysis, data requests, and SME interviews, the IE conducted field assessments within HFTP Tier 2 and Tier 3 areas to collect images and evaluate compliance with the 2023 activities or initiatives identified during the IE initial review. The analysis and key findings for each respective section are detailed further within the following sections.

3.1 WMP Activity Completion

WMP activities outlined in Bear Valley's 2023 WMP are demonstrated in the document, "BVES_2023_Q4_Tables1-15_R0.xlsx". Appendix A provides a detail of the initial activities and their grouping as it pertains to Initial IE Categorization. As described above, the WMP activity includes initiatives aligned with compliance metrics developed by Energy Safety. Given the nature of Bear Valley's asset inventory, the IE assessment of activity completion is itemized in this report's following sections. The details in Section 3.1.1, and in conjunction with Appendix A, provide a comprehensive overview of the specific verifications conducted by the IE.

3.1.1 Sampling Methodology and Discussion

BVNA IE random sampling sizing for Bear Valley are based upon the ANSI Mil. Std 105E supported by Acceptable Quality Limit (AQL) as the foundational standard. Based on the selective sample sizing, the use of 2.5% defect is the acceptable level of major defective as a tolerance along with an inspection level of II as normally used. Mil-Std-105E (ANSI Z1.4) as a sampling plan begins by determining the lot size, the inspection level and then applying the appropriate table for sample size and the accept/reject criteria.

BVNA was accepted and listed as an approved IE conducting the assessment of Bear Valley's yearly WMP for a (3) year cycle from 2023-2025. BVNA has utilized the referenced standard for selection of samples and evaluating acceptable error levels; but has also gained a level of confidence from the provided data and field verifiable state of Bear Valley's performance in meeting with their commitment of objective targets including specific quantifiable or qualitative performance goals and targets, verification of QA/QC program implementation, process, and results; and the distribution of funding to initiatives so described within the WMP.

Large Volume Quantifiable Goal/Target – Field Verifiable

The IE applied sampling methodologies and standards to program targets to ensure the sampling quantities were statistically acceptable. When BVES's actual quantity of completed work exceeded the amount targeted, the greater and 'actual' number was used when determining the field review sample quantities. According to the standard, general inspection level two should be used and was applied as the default inspection level unless

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otherwise specified. See Table 1: Program Sampling Methodology Summary for Large Volume Quantifiable Goal/Target Field Verifiable that summarizes the individual program targets, actuals, sampling methodologies/standards, and the IE sample size/target.

The IE conducted field inspections assessing compliance for work completion, work quality, and adherence to applicable protocols and procedures. The IE field sample targets are minimums, and larger sample numbers were obtained when possible. In addition, the IE has made data requests on these program targets to review, where applicable, standards, as-built, and relevant QA/QC program documentation. This multi-faceted approach supports verification results extrapolated across sample populations.

The IE assessed the following five (5) items provided as part of BVES's 2023 WMP's list of initiatives under section **3.1.2.1 Large Volume Quantifiable Goal/Target - Field Verifiable**.

Table 1: Program Sampling Methodology Summary for Large Volume Quantifiable Goal/Target – Field Verifiable

Program	Units	Sections	Sampling Standard	BVES Target ¹ /Actual ²	IE Field Sample Target
Covered Conductor Replacement Project	Circuit Miles	8.1.2.1 - GD_1	ANSI/ASQ Z1.4	12.9/20.7	5
Distribution Pole Replacements and Reinforcements	EA	8.1.2.3 - GD_4	ANSI/ASQ Z1.4	200/309	50
Evacuation Route Hardening Project	EA	8.1.2.3 - GD_6	ANSI/ASQ Z1.4	500/909	80
Tree Attachment Removal Project	EA	8.1.2.10 - GD_19	ANSI/ASQ Z1.4	100/114	20
Clearance	Circuit Miles	8.2.3.3 - VM_9	ANSI/ASQ Z1.4	72/72	20

¹ BVES Targets reported per BVES's 2023-2025 Wildfire Mitigation Plan R2 Dated November 16, 2023.

² BVES Actuals reported per Q4 2023 BVES Quarterly Notification Letter Dated February 1, 2024, per BVES_2023_Q4_Tables1-15_R0 Table 1 Actual Q1-4 Progress.

Large Volume Quantifiable Goal/Target – Not Field Verifiable

Similar to the Large Volume Quantifiable Goal/Target Field Verifiable noted previously, the IE applied the same sampling methodologies and standards to program targets to ensure the sampling quantities were statistically acceptable. When BVES's actual quantity of completed work exceeded the amount targeted, the greater and 'actual' number was used when determining the sample quantities. According to the standard, general inspection level

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two should be used as indicated above in Section 3.1.1. See Table 2: Program Sampling Methodology Summary for Large Volume Quantifiable Goal/Target Not Field Verifiable that summarizes the individual program targets, actuals, sampling methodologies/standards, and the IE sample size/target.

The IE made initial data requests on these program targets to review the work completed and identify and request completion records for the sample size in conformance with the sampling methodology described herein. The IE has also made data requests on these program targets to review, where applicable, standards, as-builts, and relevant QA/QC program documentation.

The IE assessed the following 15 items provided as part of BVES's 2023 WMP's list of initiatives under section **3.1.2.2 Large Volume Quantifiable Goal/Target - Not Field Verifiable**.

Table 2: Program Sampling Methodology Summary for Large Volume Quantifiable Goal/Target – Not Field Verifiable

Program	Units	Sections	Sampling Standard	BVES Target ¹ /Actual ²	IE Sample Target
Detailed Inspections	Circuit Miles Inspected	8.1.3.1 – GD-25	ANSI/ ASQ Z1.4	134.5/135	20
Patrol Inspections	Circuit Miles Inspected	8.1.3.1 – GD-26	ANSI/ ASQ Z1.4	205.2/205.2	32
UAV Thermography	Circuit Miles Inspected	8.1.3.1 – GD-27	ANSI/ ASQ Z1.4	205.2/205.2	32
UAV HD Photography/ Videography	Circuit Miles Inspected	8.1.3.1 – GD-28	ANSI/ ASQ Z1.4	205.2/205.2	32
LiDAR Inspection	Circuit Miles Inspected	8.1.3.1 – GD-29	ANSI/ ASQ Z1.4	205.2/205.2	32
3rd Party Ground Patrol	Circuit Miles Inspected	8.1.3.1 – GD-30	ANSI/ ASQ Z1.4	205.2/205.2	32
Intrusive Pole Inspections	Number of Poles Intrusively Inspected	8.1.3.1 – GD-31	ANSI/ ASQ Z1.4	850/850	80
Substation inspections	Number of Substations Inspected	8.1.3.1 – GD-32	ANSI/ ASQ Z1.4	144/144	20
Detailed Inspections	Miles	8.2.2.1 - VM_1	ANSI/ ASQ Z1.4	134.5/135	20

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Patrol Inspections	Miles	8.2.2.1 - VM_2	ANSI/ ASQ Z1.4	205.2/205.2	32
UAV HD Photography/ Videography	Miles	8.2.2.1 - VM_3	ANSI/ ASQ Z1.4	205.2/205.2	32
LiDAR Inspection	Miles	8.2.2.1 - VM_4	ANSI/ ASQ Z1.4	205.2/205.2	32
3rd Party Ground Patrol	Miles	8.2.2.1 - VM_5	ANSI/ ASQ Z1.4	205.2/205.2	32
Substation inspections	EA	8.2.2.1 - VM_6	ANSI/ ASQ Z1.4	144/144	20
Public outreach and education awareness program	Number of Public Outreach and Education Events	8.5.2 – COE-1	ANSI/ ASQ Z1.4	360/829	50

¹ BVES Targets reported per BVES's 2023-2025 Wildfire Mitigation Plan R2 Dated November 16, 2023.

² BVES Actuals reported per Q4 2023 BVES Quarterly Notification Letter Dated February 1, 2024, per BVES_2023_Q4_Tables1-15_R0 Table 1 Actual Q1-4 Progress.

Small (less than 100 times) Volume Quantifiable Goal/Target

Similar to the Large Volume Quantifiable Goal/Target Not Field Verifiable noted previously, the IE applied the same sampling methodologies and standards to program targets to ensure the sampling quantities were statistically acceptable. When BVES's actual quantity of completed work exceeded the amount targeted, the greater and 'actual' number was used when determining the sample quantities. According to the standard, general inspection level two should be used as indicated above in Section 3.1.1. See Table 3: Program Sampling Methodology Summary for Small (less than 100 times) Volume Quantifiable Goal/Target that summarizes the individual program targets, actuals, sampling methodologies/standards, and the IE sample size/target.

The IE made initial data requests on these program targets to review the work completed and identify and request completion records for the sample size in conformance with the sampling methodology described herein. The IE has also made data requests on these program targets to review, where applicable, standards, as-builts, and relevant QA/QC program documentation.

The IE assessed the following 12 items provided as part of BVES's 2023 WMP's list of initiatives under section **3.1.2.3 Large (less than 100 times) Volume Quantifiable Goal/Target**.

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**Table 3: Program Sampling Methodology Summary for Small (less than 100 times)
Volume Quantifiable Goal/Target**

Program	Units	Sections	Sampling Standard	BVES Target ¹ /Actual ²	IE Sample Target
Substation Automation	Number of Substations Automated and Connected to SCADA	8.1.2.8 – GD-12	ANSI/ ASQ Z1.4	3/3	2
Switch and Field Device Automation	Number of Field Switches Automated and Connected to SCADA	8.1.2.8 – GD-13	ANSI/ ASQ Z1.4	13/13	3
Capacitor Bank Upgrade Project	Number of Capacitor Banks Replaced and Connected to SCADA	8.1.2.8 – GD-14	ANSI/ ASQ Z1.4	6/6	2
Fuse TripSaver Automation	Number of Fuse TripSavers Automated and Connected to SCADA	8.1.2.8 – GD-15	ANSI/ ASQ Z1.4	10/10	3
Asset Quality assurance/ quality control	EA	8.1.6 - GD_35	ANSI/ ASQ Z1.4	20/20	5
Fall-in mitigation	EA	8.2.3.4 - VM_10	ANSI/ ASQ Z1.4	88/168	32
Substation defensible space	EA	8.2.3.5 - VM_11	ANSI/ ASQ Z1.4	13/13	5
Vegetation Management Quality assurance / quality control	EA	8.2.5 - VM_16	ANSI/ ASQ Z1.4	5/5	5
Install Fault Indicators	EA	8.3.3 - SAF_2	ANSI/ ASQ Z1.4	30/35	5

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Online Diagnostic System	EA	8.3.3 - SAF_3	ANSI/ ASQ Z1.4	2/2	2
Engagement with access and functional needs populations	AFN Customer Needs Verifications	8.5.3 – COE-2	ANSI/ ASQ Z1.4	12/24	3
Best practice sharing with other utilities	Working Groups, Conferences	8.5.5 – COE-4	ANSI/ ASQ Z1.4	15/120	3

¹ BVES Targets reported per BVES’s 2023-2025 Wildfire Mitigation Plan R2 Dated November 16, 2023.

² BVES Actuals reported per Q4 2023 BVES Quarterly Notification Letter Dated February 1, 2024, per BVES_2023_Q4_Tables1-15_R0 Table 1 Actual Q1-4 Progress.

Sampling Distribution

The IE conducted an independent site selection process to determine sample locations for field verifications taken from the populated data for each initiative and applied Random Sampling across BVES's territory. In all cases, sampling was targeted within HFTD Tiers 2 and 3 areas. Further, it targeted high-density areas to improve field inspection efficiency and maximize sampling quantities.

Sample sizes and their analysis were adequate for a general understanding of the reviewed items. The sample sizes over time allotments are insufficient to provide a definite accounting of item qualities or miles stated within BVES's 2023 WMP targets. However, as requested in the Final IE Scope of Work document, general and linear extrapolations and deductions were made from the sample size results, which were distributed as defined within this document. These included the actual installation or removal of the item (work completion), general work quality, adherence to protocols, standards, and procedures, and item location or confirming operational outputs.

See Figure 2: Overview of Areas Sampled, which provides a general overview of the locations sampled within Section 3.1.2.1 Large Volume Quantifiable Goal/Target - Field Verifiable.

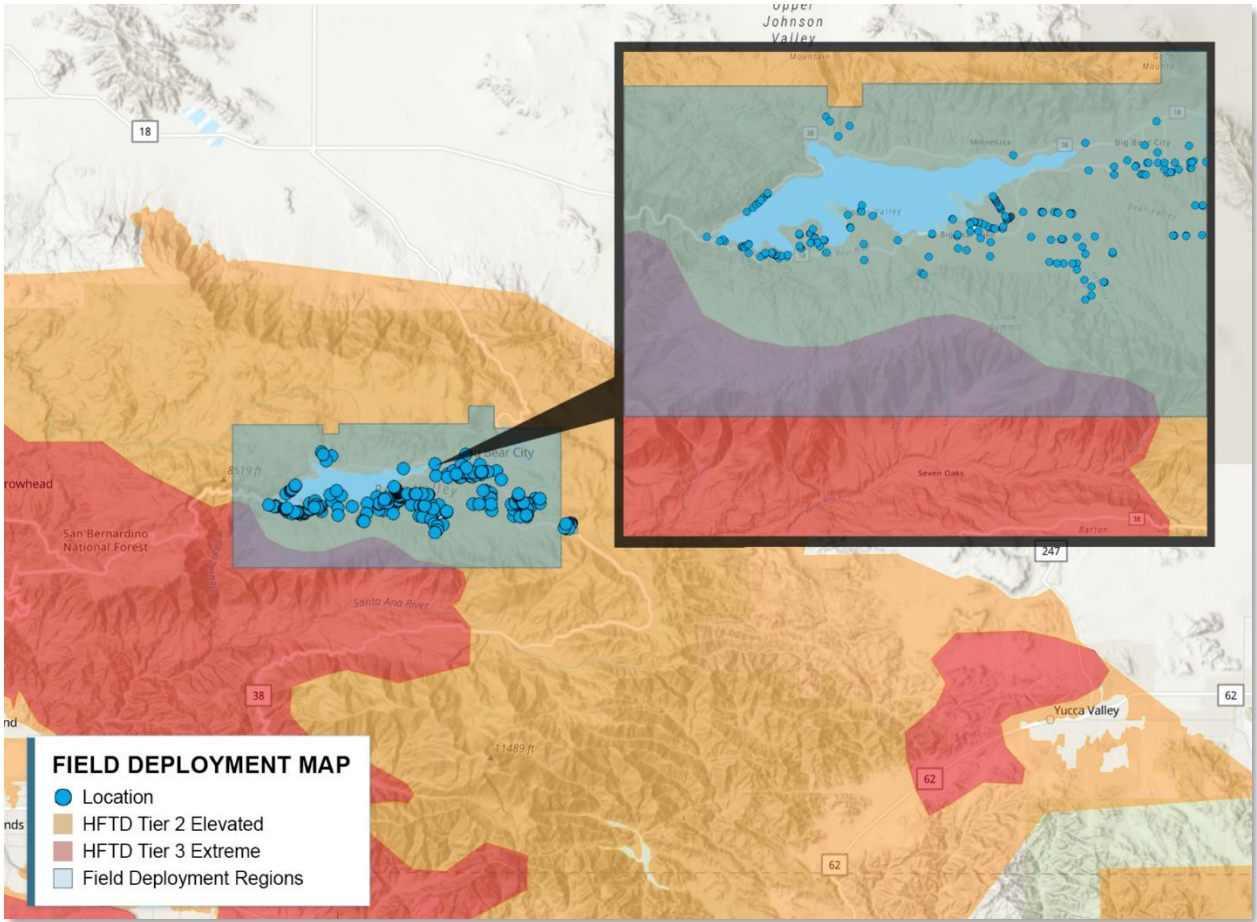


Figure 2: Overview of Areas Sampled

3.1.2 Review of Initiatives

3.1.2.1 Large Volume Quantifiable Goal/Target – Field Verifiable

The following information comprises detailed descriptions of the IE’s assessments of BVES’s various initiatives categorized as Large Volume Quantifiable Field Verifiable. The approach to assessing each initiative, along with the IE’s findings, are described in this section.

8.1.2.1 - GD 1 - Covered Conductor Replacement Project

Replacement and Installation of covered conductors reduces the risk of wildfire ignition by eliminating tree, vegetation, and debris contact on overhead distribution assets. The initiative is prioritized to replace all sub-transmission lines and distribution lines in high-risk areas. The program definition of replacement is described within Section 8.1.2.1 Covered Conductor Installation of the 2023 WMP.

BVES committed to installing covered wire on 12.9 higher risk circuit miles in 2023 per Table 8-3 Grid Design, Operations, and Maintenance Targets by Year of the 2023 WMP. BVES’s goal to install 12.9 miles was met and exceeded by 7.8 miles, installing covered wire on a total of 20.7 miles, per BVES’s self-reporting within the 2023 Q4 QDR Dated February 1, 2024, provided in response to Data Request DR_002. Utilizing the information provided within the Confidential Response to Data Request DR_004, the IE team incorporated the provided information into its field sampling plan with an initial target of 5 circuit miles. The goal was surpassed with the IE team field verifying 7 circuit miles, exceeding the target by 2 miles. For illustrative examples of these observations please refer to Figure 3: Example Covered Conductor Replacement Field Images, provided below.

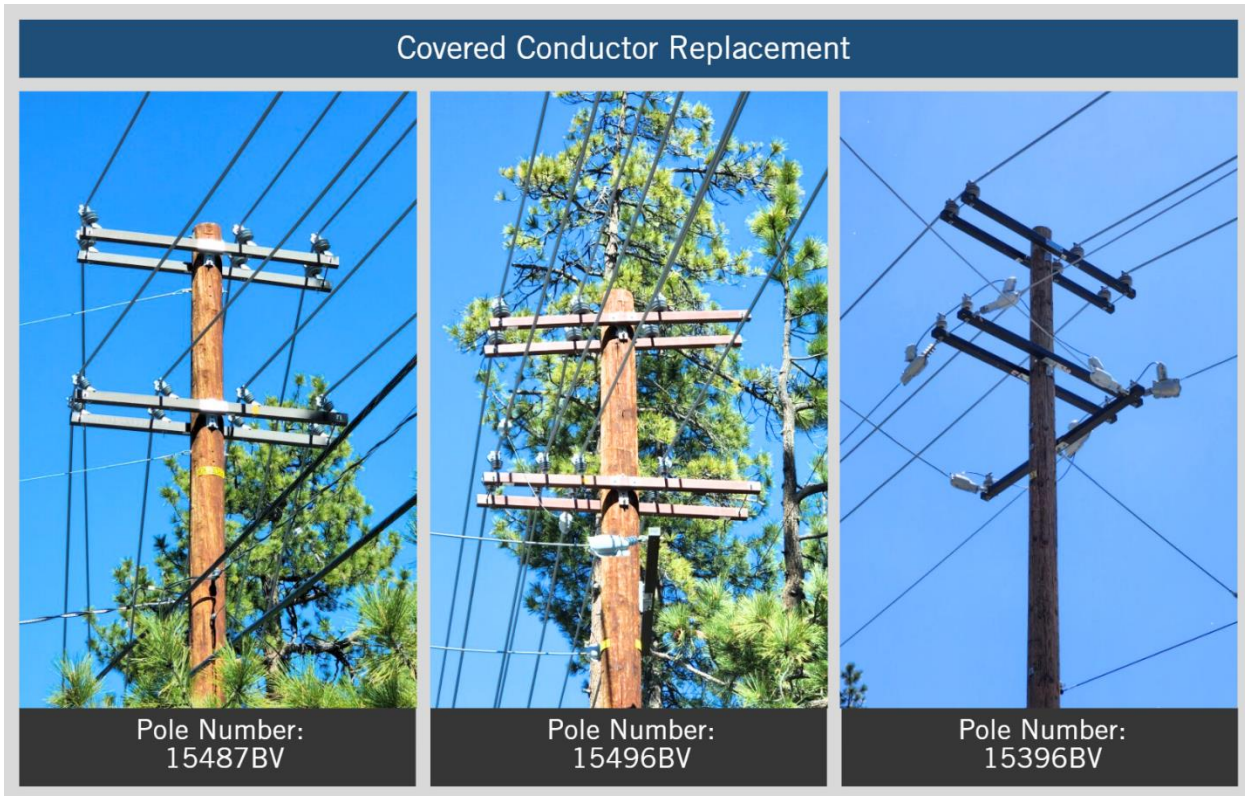


Figure 3: Example Covered Conductor Replacement Field Images

The IE was able to confirm installation of covered conductors with a two-tiered approach involving field imagery captured with handheld cameras & a vehicle-mounted 360° camera with GPS data-logging capabilities to accurately map the selected work areas as defined in the Confidential Response to Data Request DR_004 for comparison against historical Google Streetview imagery from 2014-2023.

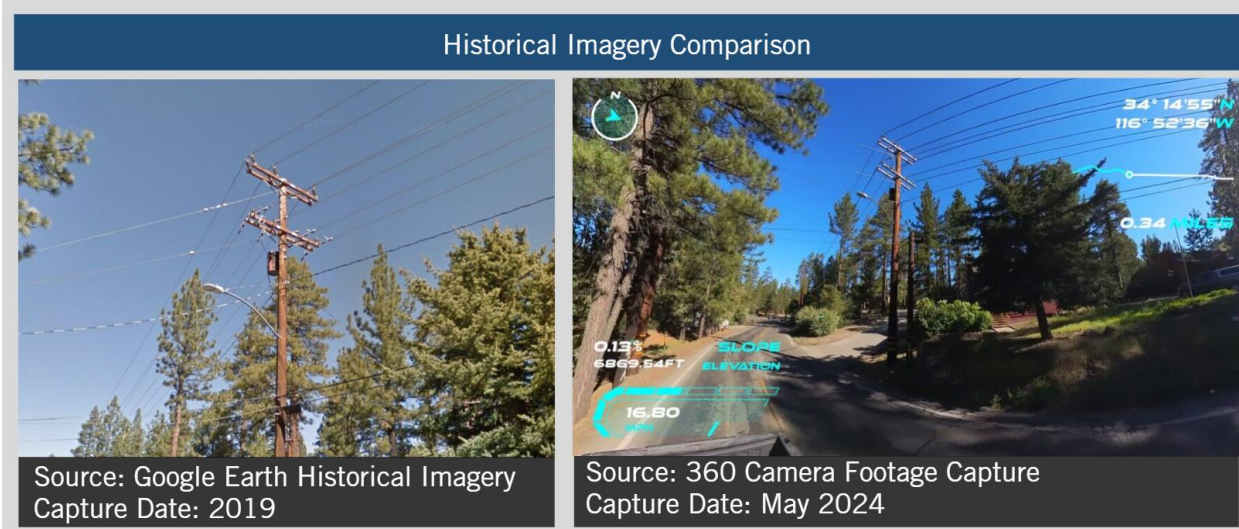


Figure 4: Historical 2019 Imagery Comparison to 2024 360° Imagery Examples – Pole replacement with new covered conductor, insulator upgrades, crossarm replacement.

Based on the IE’s verification sample and additionally provided documentation, data suggests that BVES likely fulfilled its commitment of 12.9 circuit miles and exceeded it by an additional 7.8 miles for a total of 20.7 circuit miles. No issues were identified and based on the assessment of the covered conductor replacement the work quality is satisfactory.

8.1.2.3 - GD 4 - Distribution Pole Replacements and Reinforcements

Reinforcing, or replacing, non-compliant distribution poles reduce the risk of wildfire ignition by reducing the likelihood of pole failures. The program definition of replacement is described within Section 8.1.2.3 Distribution Pole Replacement and Reinforcements of the 2023 WMP.

BVES committed replacing 200 distribution poles in 2023 per Table 8-3 Grid Design, Operations, and Maintenance Targets by Year of the 2023 WMP. BVES’s goal to replace or reinforce 200 distribution poles was met and exceeded by 109 poles, replacing or reinforcing a total of 309 distribution poles, per BVES’s self-reporting within the 2023 Q4 QDR Dated February 1, 2024, provided in DR_002. From the Confidential Response to Data Request DR_005, the IE field team randomly sampled and verified a sample of 89 distribution structures replaced or reinforced in 2023. The IE’s target goal of 50 field verified locations was exceeded by 39, for a total of 89 sampled sites. All 89 sampled locations complied with the initiative goals.

Upon a thorough review of the data provided and the IE team’s field verification samples, it appears likely that BVES fulfilled its commitment of 200 poles and exceeded it by an additional 109 poles for a total of 309 poles. For illustrative examples of these observations

please refer to Figure 5: Example Distribution Pole Replacement and Reinforcement Field Images, provided below.

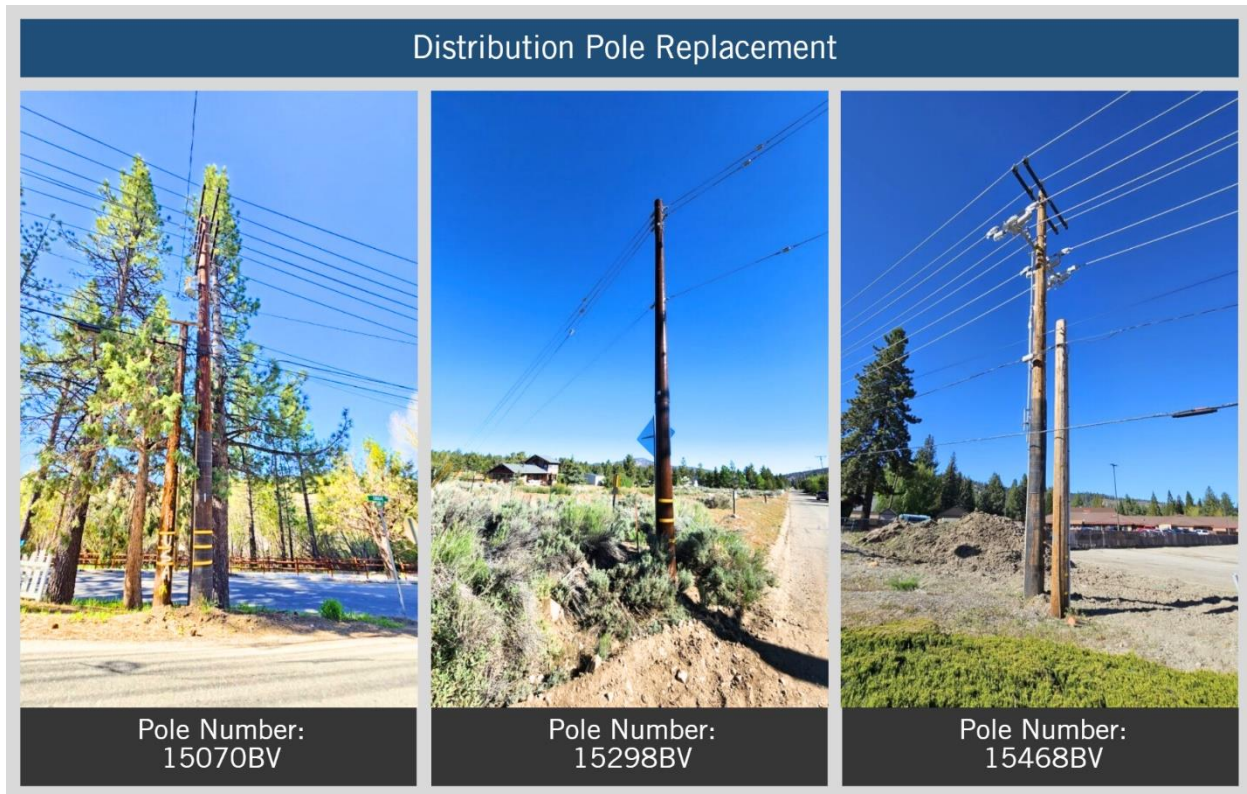


Figure 5: Example Distribution Pole Replacement and Reinforcement Field Images

Field assessments of the pole replacements were reviewed for workmanship quality, the accuracy of the information, and compliance with the initiative in alignment with the initiative description as described within the 2023 WMP. One data discrepancy was identified during the field assessment:

- One (1) structure does not align with the provided coordinates. The structure is approximately 180 feet from the provided coordinates.

8.1.2.3 - GD 6 - Evacuation Route Hardening Project

Following the completion of the evacuation hardening pilot project in 2021, BVES developed this initiative to ensure predetermined evacuation routes were safe from electrical asset failures in the event of an emergency. With the installation of a fire-resistant wire wrap mesh on distribution poles, BVES is hardening the electrical assets along the secondary evacuation routes. The program definition of hardening is described within Section 8.1.2.3 Evacuation Route Hardening Pilot & Program of the 2023 WMP.

BVES committed to installing the fire-resistant wire wrap mesh on 500 distribution poles in 2023 per Table 8-3 Grid Design, Operations, and Maintenance Targets by Year of the 2023 WMP. BVES's goal to hardening 500 distribution poles was met and exceeded by 409 poles, installing fire-resistant wire wrap mesh on a total of 909 distribution poles, per BVES's self-reporting within the 2023 Q4 QDR Dated February 1, 2024, provided in DR_002. From the Confidential Response to Data Request DR_006, the IE field team randomly sampled and verified a sample of 115 distribution structures hardened with a fire-resistant wire wrap mesh in 2023. The IE's target goal of 80 field verified locations was exceeded by 35, for a total of 115 sampled sites. All 115 sampled locations complied with the initiative goals.

Upon a thorough review of the data provided and the IE team's field verification samples, it appears likely that BVES fulfilled its commitment of 500 poles and exceeded it by an additional 409 poles for a total of 909 poles. For illustrative examples of these observations please refer to Figure 6: Example Evacuation Route Hardening Field Images, provided below.

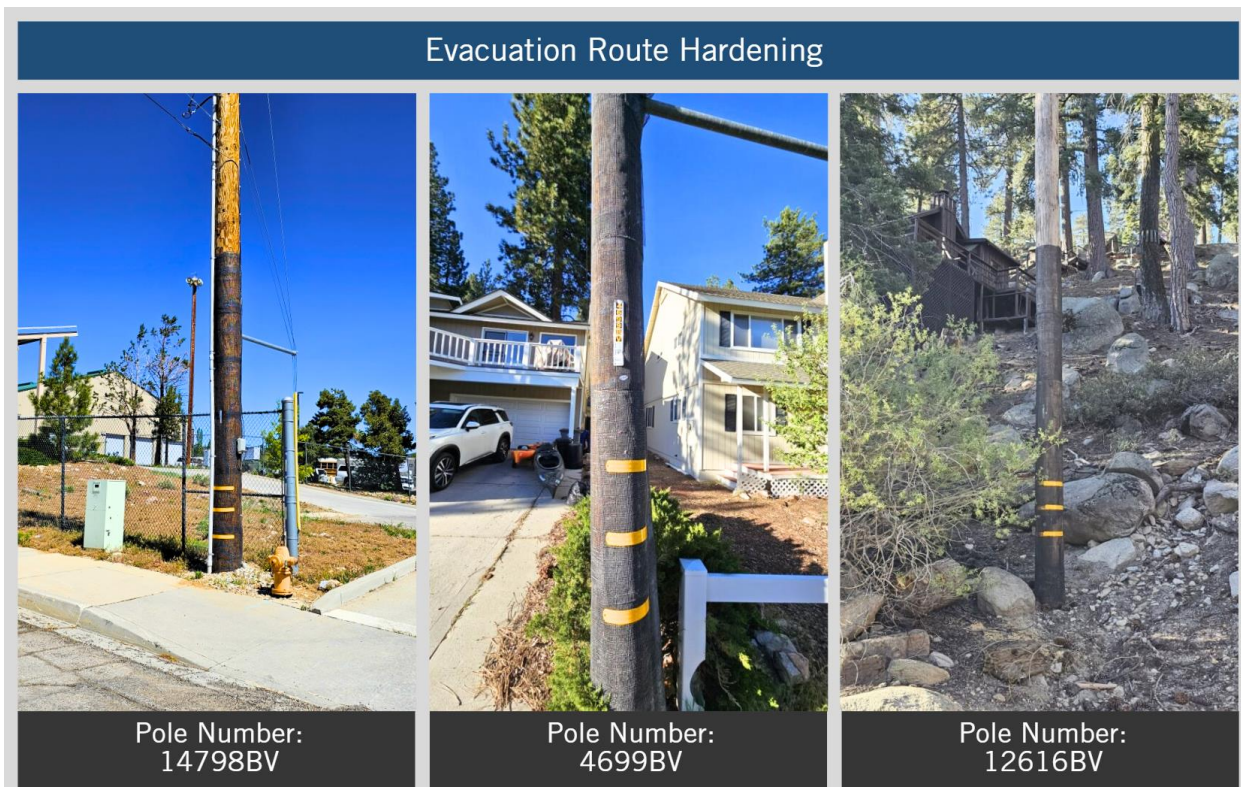


Figure 6: Example Evacuation Route Hardening Field Images

Field assessments of the evacuation route hardening were reviewed for workmanship quality, the accuracy of the information, and compliance with the initiative in alignment with the initiative description as described within the 2023 WMP. No issues were identified and based on the assessment of the evacuation route hardening; the work quality is satisfactory.

8.1.2.10 - GD 19 - Tree Attachment Removal Project

Removing the legacy service attachments and wires from trees and replacing them with distribution poles reduces the risk for ignition by moving the energized wires away from vegetation. The program tree attachment removal is described within Section 8.1.2.10 Other Grid Topology Improvements to Minimize Risk of Ignitions of the 2023 WMP.

BVES committed to removing 100 tree attachments in 2023 per Table 8-3 Grid Design, Operations, and Maintenance Targets by Year of the 2023 WMP. BVES's goal to remove 100 tree attachments was met and exceeded by 14 removals, removing a total of 114 tree attachments, per BVES's self-reporting within the 2023 Q4 QDR Dated February 1, 2024, provided in DR_002. For illustrative examples of these observations please refer to Figure 7: Example Tree Attachment Removal Field Images, provided below.



Figure 7: Example Tree Attachment Removal Field Images

From the Confidential Response to Data Request DR_007, the IE field team randomly sampled and verified a sample of 23 tree attachment removals in 2023. The IE's target goal of 20 field verified locations was exceeded by 3, for a total of 23 sampled sites. 22 were found to be in compliance with the initiative, and one (1) of the sampled locations, or 4.3% of the structures sampled, were found to be out of compliance. The following non-compliance issues were identified during the field assessment.

- One (1) location still has a secondary conductor tree attachment that terminates to a weatherhead with a meter on what appears to be a customer owned pole, as shown in Figure 8. **Note:** There is no historical imagery available for this location as it is on Private Property; The GPS location provided in Confidential Response to Data Request DR_007 matches location identified in the field by the IE.



Figure 8: Secondary Conductor Tree Attachment Remaining

Upon a thorough review of the data provided and the IE team’s field verification samples, it appears likely that BVES fulfilled its commitment of 100 tree attachment removals as reported. However, with 4.3% of the sampled locations not found to have been completed during the field audit, the IE cannot confirm that BVES exceeded its commitment by an additional 14 tree attachment removals as reported. Field assessments of the tree attachment removals were reviewed for workmanship quality, the accuracy of the information provided, and compliance with the initiative described within the 2023 WMP. The work quality of 22 out of the 23 locations assessed by the IE is satisfactory.

8.2.3.3 - VM 9 – Clearance

BVES developed this program to exceed the requirements of the CPUC, with the goal to be proactive with vegetation management to reduce the risk of wildfire ignition. The program definition of clearance and vegetation management is described within Section 8.2.3.3 Clearance of the 2023 WMP.

BVES committed to clearing 72 circuit miles of vegetation around electrical assets in 2023 per Table 8-14 Vegetation Management Initiative Targets by Year of the 2023 WMP. BVES’s goal of vegetation clearance of 72 circuit miles was met per BVES’s self-reporting within the

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2023 Q4 QDR Dated February 1, 2024, provided in DR_002. Utilizing the information provided within Data Request DR_008, the IE team incorporated the provided information into its field sampling plan with an initial target of 20 circuit miles. The goal was surpassed with the IE team field verifying 23.4 circuit miles, exceeding the target by 3.4 circuit miles.

The IE was able to confirm the clearance of vegetation from electrical assets with a two-tiered approach involving field imagery captured with handheld cameras & a vehicle-mounted 360° camera with GPS data-logging capabilities to accurately map the selected work orders for comparison against historical Google Streetview imagery from 2023. For illustrative examples of these observations please refer to Figures 9 and 10: Example Clearance Field Images, provided below.



Figure 9: Historical 2023 Imagery Comparison to 2024 360° Imagery Examples



Figure 10: Historical 2023 Imagery Comparison to 2024 360° Imagery Examples

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Based on the IE’s verification sample and additionally provided documentation, data suggests that BVES likely fulfilled its commitment of 72 circuit miles. No issues were identified and based on the assessment of the vegetation clearance; the work quality is satisfactory.

Table 4: Large Volume Quantifiable Goal/Target – Field Verifiable Summary Table

Initiative Number/ID	Initiative Name	Population Size/Target	Sample Size	#, % Verified	#, % Verification Failed
GD_1	Covered Conductor Replacement Project	12.9 Circuit Miles	7 Circuit Miles	7, 100%	0,0%
GD_4	Distribution Pole Replacements and Reinforcements	200 EA	89 EA	89, 100%	0,0%
GD_6	Evacuation Route Hardening Project	500 EA	115 EA	115, 100%	0,0%
GD_19	Tree Attachment Removal Project	100 EA	23 EA	22, 95.7%	1, 4.3%
VM_9	Clearance	72 Circuit Miles	23.4 Circuit Miles	23.4, 100%	0,0%

3.1.2.2 Large Volume Quantifiable Goal/Target – Not Field Verifiable

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2023 WMP, BVES provided a complete list of all 2023 WMP activities classified as Large Volume Quantifiable Goal/Target - Not Field Verifiable completed in 2023. The IE's review and evaluation of these initiatives were completed through data request documentation from BVES completion of initiatives and publicly available documents, articles, and reports. These 2023 WMP activities identified within the Large Volume Not Field Verifiable list were reviewed and assessed within this section, and the findings are presented below for each initiative.

8.1.3.1 - GD 25 - Detailed Inspections

Data was gathered to assess initiative GD_25 to WMP section 8.1.3.1 for detailed inspections of 135 circuit miles to ensure the safety and operational reliability of BVES's electrical Transmission network.

Data collected in response to requests regarding this initiative was made to provide insight into progress made towards meeting the initiative targets. A list of 28 overhead transmission and distribution lines, poles and equipment inspection reports were provided for review, which exceeded the quantity referenced in the WMP. The underground electrical network was also included in the mile matrix total. Based upon this list 135 miles of inspection reports 13 were selected for review based on a modified ANSI Z1.4 sample size and prioritized by HFTD Tier 2 & 3, randomized for reviews.

The inspection reports demonstrated consistent formatting and verbiage across all documents, ensuring clarity and ease of understanding. Each report included referenced descriptions of finding declarations.

Findings:

- 1 instance of error on Inspection Report notations of incorrect date and missing information.

Table 5: Detailed Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR009 Response	Summary
Detailed Inspections	135 Inspections	135 Inspections	135 Inspections	Target Met

8.1.3.1 - GD 26 - Patrol Inspections

Data was gathered to assess initiative GD_26 according to WMP section 8.1.3.2 for patrol inspections of overhead facilities in HFTD areas to ensure the safety and operational reliability of BVES's electrical distribution network. Data collected in response to requests regarding the initiative provided insights into the progress made towards meeting the initiative targets.

The Patrol Inspection Program, identified by Tracking ID: GD_26 - VM_2, is designed to comply with GO 165. It mandates an annual visual inspection of all overhead facilities annually to identify obvious problems, gross defects, and hazards. The program aims to mitigate wildfire risks caused by electric utility facilities at all overhead facilities within BVES's service territory, which is entirely within HFTD Tier 2 or Tier 3.

A spreadsheet containing 28 entries in 2023 was sent in response to a request for data. Each entry had information to identify a structure and contained a short detail about condition or repair needed. A written response included a statement that 205 circuit miles were inspected in 2023 throughout the year. While the statement also indicated that BVES does not currently track individual asset GPS locations in response to request for mile identification, the spreadsheet identified structures by address and coordinates. 24 individual PDF report files were also sent, each containing a written record of the circuit name, inspection type, voltage, inspector, and date in 2023.

The written response indicates that 205 circuit miles were inspected in 2023, and the data suggests that inspections were conducted throughout the year. Additional data on the total miles of overhead facilities within the service territory from responses to data requests in other related sections also showed compliance with the targets set in the WMP.

With the available inspection information provided by BVES through data requests, the initiative has been determined to be Met.

Table 6: Patrol Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR010 Response	Summary
Patrol Inspection Program	205 Circuit Miles Inspected	205 Circuit Miles Inspected	28 Structures, 24 Inspection Reports	Target Met

8.1.3.1 - GD 27 - UAV Thermography

Data was gathered to assess initiative GD_27 according to WMP section 8.1.3.1 for UAV thermography inspections of overhead facilities in HFTD areas to ensure the safety and operational reliability of BVES's electrical distribution network. Data collected in response to requests regarding the initiative provided insights into the progress made towards meeting the initiative targets.

The UAV Thermography Inspection Program, identified by Tracking ID: GD_27, is designed to provide inspection results that other methods cannot. This technology's ability to identify "hot spots" often indicate potential equipment degradation or failure. Upon receiving the thermography survey report, BVES investigates each finding to validate the conditions and assign priorities according to GO 95. Immediate corrective actions are taken for any level 1 findings to resolve them as soon as possible. The Wildfire Mitigation and Reliability Engineer reviews the results, assigns corrective actions, and cross-checks the thermography survey results against other asset inspections.

A spreadsheet containing 1,807 entries in 2023 was sent in response to DR 11. Each entry had information tied to 41 equipment types and assessment conditions designated as yes or no. A written response included a statement that 205 circuit miles were inspected in 2023, completed by 5/16/23. A response to request for more detailed information at 32 randomly selected locations provided indication that the structure locations were tied to circuit miles as described in the WMP target. This response also included a brief description of visual photo findings for each location. The utility indicated access to photo records is pending setup of individual reviewers in a BVES portal.

The provided data aligns with the WMP's requirement for annual thermography inspections covering the entirety of BVES's overhead facilities. The data suggests that inspections were conducted within the designated timeframe, and additional information is available through a portal, which indicates a thorough documentation process. The written response suggests that 205 circuit miles were inspected in support of the initiative's goal of comprehensive coverage of BVES's service territory.

With the available inspection information provided by BVES through data requests, the initiative has been determined to be Met.

Table 7: UAV Thermography Summary

Description	2023 Target	2023 Q4 QDR	DR011 Response	Summary
UAV Thermography	205 Circuit Miles Inspected	205 Circuit Miles Inspected	1,807 Structures, tied to Circuit Miles	Target Met

8.1.3.1 - GD 28 - UAV HD Photography/Videography

Data was gathered to assess initiative GD_28 according to WMP section 8.1.3.4 for UAV HD photography/videography inspections of overhead facilities in HFTD areas to ensure the safety and operational reliability of BVES's electrical distribution network. Data collected in response to requests regarding the initiative provided insights into the progress made towards meeting the initiative targets.

The UAV HD Photography/Videography Inspection Program, identified by Tracking ID: GD_28 – VM_3, complements ground patrols and detailed inspections mandated by GO 165, as well as LiDAR inspections. This inspection method involves UAV fly-over inspections of BVES’s sub-transmission and distribution systems. The UAVs film the facilities using high-definition video photography, maintaining accurate date/time and geolocation stamps on the recorded video streams. Qualified analysts review these recordings, slowing them down to note any issues, and performing further analysis on potential issues by zooming in on specific items. Discrepancies are then identified, evaluated, recorded, and remediation or further investigation is assigned. Additionally, the UAVs collect infrared thermography data to identify risk drivers such as increased “hot” areas or conditions indicative of deterioration.

Thirteen files, each containing twelve monthly 2-page substation reports from 2023, were sent in response to DR 12. Each monthly report was hand-recorded and contained a page noting the operating conditions of various substation equipment, and another signed and dated page consisting of checklist inspection conditions. Out of the 156 total inspection reports, one report was noted as not completed, resulting in non-compliance.

The Bear Valley online portal was also referenced in the data request. Several overhead pictures at each circuit data point suggested that the WMP’s requirement for annual UAV HD photography/videography inspections of BVES's overhead facilities were met. The data suggests that inspections were conducted regularly throughout the year, with detailed documentation of operating conditions and inspection checklists with only one finding noted. The correlation of data points with circuit miles targets was established in response to other initiative data requests.

With the available inspection information provided by BVES through data requests and online portal, the initiative has been determined to be Met.

Table 8: UAV HD Photography/Videography Summary

Description	2023 Target	2023 Q4 QDR	DR012 Response	Summary
UAV HD Photography/Videography	205 Circuit Miles Inspected	205 Circuit Miles Inspected	156 Substation Reports	Target Met

8.1.3.1 - GD 29 - LiDAR Inspection

Data was gathered to assess initiative GD_29 according to WMP section 8.1.3.5 for LiDAR inspections of overhead facilities in HFTD areas to ensure the safety and operational reliability of BVES's electrical distribution network. Data collected in response to requests regarding the initiative provided insights into the progress made towards meeting the initiative targets.

The LiDAR Inspection Program, identified by Tracking ID: GD_29 – VM_4, involves an annual LiDAR sweep of BVES’s entire service area. This enhanced inspection method uses LiDAR technology to evaluate the effectiveness of vegetation clearance efforts and identify potential wildfire hazards. LiDAR employs lasers and software to develop surveys of the overhead sub-transmission and distribution systems, accurately determining vegetation clearances to conductors. BVES uses a combination of helicopter, fixed-wing flights, and truck-mounted mobile systems for these inspections. The findings from the LiDAR surveys are rated in accordance with GO 95 Rule 18 and entered into the distribution inspection GIS database. Each finding is investigated by qualified personnel, and the priority is reassigned if necessary. Level 1 findings are immediately communicated to BVES for prompt resolution.

The provided data through the Bear Valley online portal suggests that the inspections were conducted as part of a program that included Lidar tracking. Of the 32 locations randomly reviewed in the portal as representative of the circuit miles, most had either lidar documentation, UAV documentation, or both UAV and Lidar documentation. The initiative’s target is being assessed as having been met due to the analysis of online portal data.

Table 9: LiDAR Inspection Summary

Description	2023 Target	2023 Q4 QDR	DR013 Response	Summary
8.1.3.5 LiDAR Inspection	205 Circuit Miles Inspected	205 Circuit Miles Inspected	Bear Valley Online Portal	Target Met

8.1.3.1 - GD 30 - 3rd Party Ground Patrol

Data was gathered to assess initiative GD_30 according to WMP section 8.1.3.6 for third-party ground patrol inspections of overhead facilities in HFTD areas to ensure the safety and operational reliability of BVES's electrical distribution network. Data collected in response to requests regarding the initiative provided insights into the progress made towards meeting the initiative targets.

The 3rd Party Ground Patrol Inspection Program, identified by Tracking ID: GD_30 – VM_5, is designed to satisfy GO 165 patrol inspection requirements. This inspection is conducted by contracted third-party, experienced, and qualified electrical distribution asset inspection contractors, effectively providing an additional annual patrol inspection alongside the one performed by BVES’s Field Inspector. This additional patrol is deemed necessary due to local climate conditions, the likelihood of icing, high winds, snow, and ice, which can weaken tree limbs and branches, as well as the high elevation and other local conditions. These factors, coupled with the area’s classification as “very dry” or “dry” approximately 80% of the time, create high-risk conditions mitigated by increased patrols. Findings from the patrols are rated and handled per GO 95 Rule 18, with Level 1 findings reported immediately to the Field Operations Supervisor for prompt corrective action.

A spreadsheet containing 6,544 entries from 2023 was sent in response to DR 14. Each entry included a pole number, coordinates, and inventory date from 2023. Additionally, a response providing more detail to tie 32 locations selected randomly by the reviewer to the circuit miles described in the WMP target was provided in a new spreadsheet. The 32 locations were selected based on the number of miles targeted.

The data suggests that the inspections were comprehensive, covering a large number of poles with detailed entries for each. The total miles accumulated for each named circuit were found to have cumulatively met and slightly exceeded the targeted miles. Photo evidence also found to have been available for all the circuits through the Bear Valley online portal MyRowKeeper.

With the available inspection information provided by BVES through data requests, the initiative has been determined to be Met.

Table 10: 3rd Party Ground Patrol Summary

Description	2023 Target	2023 Q4 QDR	DR014 Response	Summary
3rd Party Ground Patrol	205 Circuit Miles Inspected	205 Circuit Miles Inspected	6,544 Structure Locations	Target Met

8.1.3.1 - GD 31 - Intrusive Pole Inspections

Data was gathered to assess initiative GD 31 according to WMP section 8.1.3.1 for intrusive pole inspections of overhead facilities in HFTD areas to ensure the safety and operational reliability of BVES's electrical distribution network. Data collected in response to requests regarding the initiative provided insights into the progress made towards meeting the initiative targets.

The Intrusive Pole Inspection Program, identified by Tracking ID: GD_31, is designed to monitor the age and structural integrity of existing wood poles in accordance with GO 165. This initiative involves detailed assessments of pole conditions, such as coring areas of identified damage, visual inspections, and other sophisticated diagnostic tools beyond simple visual assessments. The inspections also include movement of soil and taking samples for analysis.

BVES conducts intrusive pole inspections on a cycle that maintains compliance with GO 165. Wood poles over 15 years old that have not previously undergone intrusive inspection are due for inspection every 10 years, while those that have passed an earlier intrusive inspection are due every 20 years. Poles found to lack the required strength during inspection are scheduled for replacement. This program is a part of BVES's Pole Loading and Assessment program and is supplemented by directed intrusive inspections as needed. All of BVES's service territory is in HFTD Tier 2 or Tier 3 with inspections scheduled based on pole age, review cycles, and other related efforts such as pole loading assessments or replacement projects prioritized by risk.

A spreadsheet containing 1,008 entries from 2023 was sent in response to DR 11. Each entry included over 40 fields detailing equipment types and assessment conditions, designated as true or false, or with short specific notations. The pole types were listed, and locations were filtered for Resistograph type inspections. The data indicates that BVES conducted a substantial number of intrusive pole inspections with comprehensive records.

The initiative's target is being assessed as Target Met based on the detailed information and language in the data request response reports. The level of supporting documentation necessary to fully evaluate and confirm the completion of inspections was not sufficient enough for a fully met initiative in the opinion of the IE.

Table 11: Intrusive Pole Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR015 Response	Summary
Intrusive Pole Inspection	850 Intrusive pole inspections	850 Intrusive pole inspections	1,008 entries	Substantially Met

8.1.3.1 - GD 32 - Substation inspections

Data collected for initiative GD_32 includes 156 monthly substation reports, each consisting of hand-recorded observations of operating conditions and checklist inspection conditions. Despite one report being noted as non-compliant, the majority of the reports provide insights into the condition of various substation equipment throughout 2023.

Section 8.1.3.1 of the WMP outlines the process for substation inspections, emphasizing the importance of mitigating wildfire risks associated with equipment failures. Both GD32 data and the WMP highlight the significance of regular substation inspections in ensuring operational reliability and mitigating wildfire risks.

In response to a request for data assessment to evaluate initiative targets, the utility provided 13 files containing 12 monthly substation reports each for the year 2023. These reports detail the operating conditions and checklist inspection conditions of various substation equipment.

With the available inspection information provided by BVES through data requests, the initiative has been determined to be Met.

Table 12: Substation Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR016 Response	Summary
Substation Inspections	144 Substations Inspected	144 Substations Inspected	156 Inspection Reports	Target Met

8.2.2.1 - VM 1 - Detailed Inspections

As described within the 2023 – 2025 WMP, BVES’s target for this initiative was to conduct careful visual inspections and maintenance of vegetation around the distribution right-of-way, where individual trees are carefully examined, visually, and the condition of each rated and recorded for 134.5 circuit miles. Per BVES’s 2023 Q4 QDR Dated February 1, 2024, provided in DR_002, BVES reported completion of vegetation management detailed inspection for 135 circuit miles. As detailed in BVES’s response to Data Request DR_09B and DR_17, BVES provided a list of detailed vegetation management inspections completed for 140.7 circuit miles as summarized below in Table 13. The IE reviewed inspection records for 28.2 circuit miles of vegetation management detailed inspections. No issues were identified in the review of the inspection reports for vegetation management detailed inspections.

Table 13: Detailed Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR_09B, DR_017 Response	Summary
Vegetation Inspections / Detailed Inspections	134.5 Circuit Miles	135 Circuit Miles	140.7 Circuit Miles	Target Met

8.2.2.1 - VM 2 - Patrol Inspections

As described within 2023 Q4 QDR Dated February 1, 2024, provided in DR_002, BVES’s target for this initiative was to conduct visual inspections of vegetation along rights-of way that is designed to identify obvious hazards for 205.2 circuit miles revised from 211 circuit miles as described within the 2023 – 2025 WMP. Per BVES’s 2023 Q4 QDR, BVES reported completion of vegetation management patrol inspections for 205.2 circuit miles. As detailed in BVES’s responses to Data Request DR_010 and DR_018, BVES provides a list of vegetation management patrol inspections for 205.67 circuit miles as summarized below in Table 14. The IE reviewed inspection records for 33.8 circuit miles of vegetation management patrol inspections. No issues were identified in the review of the inspection reports for vegetation management patrol inspections.

Table 14: Patrol Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR_010, DR_018 Response	Summary
Vegetation Inspections / Patrol Inspections	205.2 Circuit Miles	205.2 Circuit Miles	205.67 Circuit Miles	Target Met

Per BVES response to Data Request DR_018, the annual target for this initiative was revised following an update to BVES GIS data which determined that the BVES overhead system contains 205 circuit miles instead of the previously used 211 circuit miles.

8.2.2.1 - VM 3 - UAV HD Photography/Videography

As described within 2023 Q4 QDR Dated February 1, 2024, provided in DR_002, BVES’s target for this initiative was to conduct inspections of right-of-way using aerial (UAV) HD photography and video cameras for vegetation management for 205.2 circuit miles revised from 211 circuit miles as described within the 2023 – 2025 WMP. Per BVES’s 2023 Q4 QDR, BVES reported completion of vegetation management UAV photography and videography for 205.2 circuit miles. As detailed in BVES’s response to Data Request DR_019 BVES provided a list of UAV vegetation management inspection locations for 205.67 circuit miles. The IE reviewed inspections for 38.4 circuit miles of vegetation management UAV photography and videography. No issues were identified in the review of the vegetation management UAV photography and videography inspections.

Table 15: UAV HD Photography/Videography Summary

Description	2023 Target	2023 Q4 QDR	DR_019 Response	Summary
Vegetation Inspections / UAV HD Photography / Videography	205.2 Circuit Miles	205.2 Circuit Miles	205.67 Circuit Miles	Target Met

Per BVES response to Data Request DR_019, the annual target for this initiative was revised following an update to BVES GIS data which determined that the BVES overhead system contains 205 circuit miles instead of the previously used 211 circuit miles.

8.2.2.1 - VM 4 - LiDAR Inspection

As described within 2023 Q4 QDR Dated February 1, 2024, provided in DR_002, BVES’s target for this initiative was to conduct inspections of right-of-way using LiDAR for vegetation management for 205.2 circuit miles revised from 211 circuit miles as described within the 2023 – 2025 WMP. Per BVES’s 2023 Q4 QDR, BVES reported completion of LiDAR inspections for vegetation management for 205.2 circuit miles. In response to Data Request DR_020 BVES confirmed that raw LiDAR scan data was unavailable due to the file size. The IE conducted a SME interview Per Appendix D, Item No. 2, in which BVES explained how LiDAR inspections for asset inspection and vegetation management are tracked and monitored for completion. BVES confirmed LiDAR inspections are completed for all circuits comprising 205.67 circuit miles as summarized below in Table 16. In response to Data

Request DR_013 BVES provided the deliverable with findings from LiDAR inspections. The IE reviewed a sample of findings for 35.4 circuit miles for LiDAR inspections for vegetation management. No issues were identified in the review of findings for LiDAR inspections for vegetation management.

Table 16: LiDAR Inspection Summary

Description	2023 Target	2023 Q4 QDR	DR_020 Response	Summary
Vegetation Inspections / Lidar Inspections	205.2 Circuit Miles	205.2 Circuit Miles	205.67 Circuit Miles	Target Met

Per BVES response to Data Request DR_020, the annual target for this initiative was revised following an update to BVES GIS data which determined that the BVES overhead system contains 205 circuit miles instead of the previously used 211 circuit miles.

8.2.2.1 - VM 5 - 3rd Party Ground Patrol

As described within BVES’s 2023 Q4 QDR Dated February 1, 2024, provided in DR_002, BVES’s target for this initiative was to conduct visual inspections of vegetation along rights-of way that is designed to identify obvious hazards performed by an independent 3rd party for 205.2 circuit miles revised from 211 circuit miles as described within the 2023 – 2025 WMP. Per BVES’s 2023 Q4 QDR, BVES reported completion of 3rd Party Ground Patrol inspections for 205.2 circuit miles. As detailed in BVES’s response to Data Request DR_021, BVES provided a list of 3rd Party Ground Patrol inspections completed for 205.67 circuit miles as summarized below in Table 17. The IE reviewed a sample of inspection reports for 35.4 circuit miles of 3rd Party Ground Patrol inspections. No issues were identified in the review of the inspection reports for 3rd Party Ground Patrol inspections.

Table 17: 3rd Party Ground Patrol Summary

Description	2023 Target	2023 Q4 QDR	DR_014, DR_021 Response	Summary
Vegetation Inspections / 3 rd Party Ground Patrol	205.2 Circuit Miles	205.2 Circuit Miles	205.67 Circuit Miles	Target Met

Per BVES response to Data Request DR_021, the annual target for this initiative was revised following an update to BVES GIS data which determined that the BVES overhead system contains 205 circuit miles instead of the previously used 211 circuit miles.

8.2.2.1 - VM 6 - Substation inspections

As described within the 2023 – 2025 WMP, BVES’s target for this initiative was to inspect vegetation surrounding substations for 144 inspections. Per BVES’s 2023 Q4 QDR, BVES reported completion of 144 substation vegetation inspections. As detailed in BVES’s response to Data Request DR_022, BVES provides a list of 156 substation vegetation inspections. The IE reviewed a sample of inspection reports for 24 substation vegetation inspections. No issues were identified in the review of the inspection reports for substation vegetation inspections.

Table 18: Substation Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR_022 Response	Summary
Vegetation Inspections / Substation Inspection	144 Inspections	144 Inspections	156 Inspections	Target Met/Exceeded by 12 Inspections

8.5.2 - COE 1 - Public Outreach and Education Awareness Program

Data was gathered to assess initiative WMP COE_1 to review BVES Public Outreach and Education Awareness to wildfires and other emergency events. BVES has a goal of continued engagement with local stakeholders to prepare for and respond to fire-related events. BVES had a 2023 target goal of 360 outreach events and reported actual number of events at 829. A sample size of 50 events was reviewed to determine if their efforts aligned with the goals set forth in COE_1. Through a combination of traditional and digital channels, BVES has disseminated information, reaching a diverse audience across various platforms.

Data collected in response to requests regarding the initiative was evaluated to determine progress made towards meeting the initiative goals. Data was also provided for the support of the Access and Functional Needs populations during de-energization events and many events included multiple language assistance.

In summary BVES has met the goal for WMP COE_1.

Table 19: Public Outreach and Education Awareness Program Summary

Description	2023 Target	2023 Q4 QDR	DR023 Response	Summary
Public outreach and education awareness program	360 Public Outreach and	829 Public Outreach and	919 Events	Target Met/Exceeded by 559 Events

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	Education Events	Education Events	
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Table 20: Large Volume Quantifiable Goal/Target – Not Field Verifiable Summary Table

Initiative Number/ID	Initiative Name	Population Size/Target	Sample Size	#, % Verified	#, % Verification Failed
GD_25	Detailed Inspections	134.5	135	20, 100%	0, 0%
GD_26	Patrol Inspections	205.2	205.2	32, 100%	0, 0%
GD_27	UAV Thermography	205.2	205.2	32, 100%	0, 0%
GD_28	UAV HD Photography/Videography	205.2	205.2	32, 100%	0, 0%
GD_29	LiDAR Inspection	205.2	205.2	32, 100%	0, 0%
GD_30	3rd Party Ground Patrol	205.2	205.2	32, 100%	0, 0%
GD_31	Intrusive Pole Inspections	850	850	80, 100%	0, 0%
GD_32	Substation inspections	144	144	20, 100%	0, 0%
VM_1	Detailed Inspections	134.5 Circuit Miles	28.2 Circuit Miles	28.2, 100%	0, 0%
VM_2	Patrol Inspections	205.2 Circuit Miles	33.8 Circuit Miles	33.8, 100%	0, 0%
VM_3	UAV HD Photography/Videography	205.2 Circuit Miles	38.4 Circuit Miles	38.4, 100%	0, 0%
VM_4	LiDAR Inspection	205.2 Circuit Miles	35.4 Circuit Miles	35.4, 100%	0,0%
VM_5	3rd Party Ground Patrol	205.2 Circuit Miles	35.4 Circuit Miles	35.4, 100%	0, 0%
VM_6	Substation inspections	144 Inspections	24 Inspections	24, 100%	0, 0%
COE_1	Public outreach and education awareness program	360	829	50, 100%	0, 0%

3.1.2.3 Small (less than 100 times) Volume Quantifiable Goal/Target

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2023 WMP, BVES provided a complete list of all 2023 WMP activities classified as Small (Less than 100 units) Volume Quantifiable Goal/Target that were conducted in 2023. These 2023 WMP activities identified within the Small Volume list were assessed in this section and presented below by each initiative.

8.1.2.8 - GD 12 - Substation Automation

8.1.2.8 of the WMP outlines the Substation Automation Project (GD_12), aiming to connect nine substations to Bear Valley's SCADA network over three years. The project involves installing SCADA-enabled control equipment, enhancing telemetry, and creating remote monitoring capabilities.

In response to a request for data assessment, the utility provided documentation confirming the connection of three substations to SCADA in 2023. The provided JPEG images depict stations at the SCADA control center, while the spreadsheet lists the connection dates for substations in Village, Bear City, and Meadow.

With the available inspection information provided by BVES through data requests, the initiative has been determined to be Met.

Table 21: Substation Automation Summary

Description	2023 Target	2023 Q4 QDR	DR024 Response	Summary
Substation Automation Project	3 SCADA Stations	3 SCADA Stations	3 SCADA Stations	Target Met

8.1.2.8 - GD 13 - Switch and Field Device Automation

Initiative GD_13, outlined in Section 8.1.2.8 of the Wildfire Management Plan (WMP), focuses on the Fault Localization Isolation and System Restoration (FLISR) project. The project aims to install nine smart high voltage switches, integrate three existing auto-reclosers, and one auto-transfer switch on the 34.5 kV system. The goal is to rapidly detect and isolate faults, restore unaffected portions of the system, and provide improved information for dispatching line crews. This initiative is intended to reduce wildfire risk and minimize the impact of Public Safety Power Shutoff (PSPS) events.

The utility provided one spreadsheet document in response to data request DR 25. The spreadsheet detailed 13 switch locations, including voltage ratings, pole identification, and functionality parameters such as GATEWAY, CONNECTIVITY, and SCADA visibility, all marked as "All Comp." The data confirmed the installation and operational status of nine smart high voltage switches, three auto-reclosers, and one auto-transfer switch. However, the utility did not provide requested PDF inspection reports for three specific element/pole number locations, which were part of a separate data request.

The data provided aligns well with the objectives of Section 8.1.2.8 of the WMP. The spreadsheet confirms the installation and operational status of the required switches and reclosers, supporting the project's goals of enhancing fault detection, isolation, and system restoration. This alignment indicates progress towards achieving the initiative's targets of reducing wildfire risk and improving system reliability during PSPS events. However, the absence of the PDF inspection reports for specific pole locations limits the verification of the equipment at these points.

The data collected for initiative GD13 partially meets the goals of Section 8.1.2.8 of the WMP.

With the available inspection information provided by BVES through data requests, the initiative has been determined to be Substantially Met. The level of supporting documentation necessary to fully evaluate and confirm the completion of inspections was not sufficient enough for a fully met initiative in the opinion of the IE.

Table 22: Switch and Field Device Automation Summary

Description	2023 Target	2023 Q4 QDR	DR025 Response	Summary
Switch and Field Device Automation	13 Switches	13 Switches	13 Switches	Substantially Met

8.1.2.8 - GD 14 - Capacitor Bank Upgrade Project

Data was gathered to assess initiative GD-14 to WMP section 8.1.2.8 for installation of (6)-New Capacitor Banks to replace existing as needed and connect to the SCADA network for the upgrade project for system automation equipment upgrade project to ensure the safety and operational reliability of BVES’s electrical Transmission and Distribution network.

Data collected in response to requests regarding this initiative was made to provide insight into progress made towards meeting the initiative targets. A list of (6)-overhead transmission equipment inspection reports were provided for review, which matched the

quantity referenced in the WMP but not the locations referenced in the target BVES Table 8-1 Capacitor Replacement List for 2023 for some reason.

Based upon this list two (2) inspection reports were selected for review based on a modified ANSI Z1.4 sample size and prioritized by HFTD Tier 2, randomized for reviews.

The inspection reports demonstrated consistent formatting and verbiage across all documents, ensuring clarity and ease of understanding. Each report included referenced descriptions and photos to confirm.

With the available inspection information provided by BVES through data requests, the initiative has been determined to be Met.

Table 23: Capacitor Bank Upgrade Project Summary

Description	2023 Target	2023 Q4 QDR	DR026 Response	Summary
Capacitor Bank Upgrade Project	6 Installs	6 Installs	6 Installs	Target Met

8.1.2.8 - GD 15 - Fuse TripSaver Automation

Data was gathered to assess initiative GD-15 to WMP section 8.1.2.8 for Target installation of ten (10) New Trip Saver units to replace existing as needed and connect to the SCADA network for the upgrade project for system automation equipment upgrade project to ensure the safety and operational reliability of BVES’s electrical Transmission and Distribution networks.

Data collected in response to requests regarding this initiative was made to provide insight into progress made towards meeting the initiative targets. A list of twelve overhead inspection reports were provided for review, which exceeded the quantity referenced in the WMP.

Based upon this list three (3) inspection reports were selected for review based on a modified ANSI Z1.4 sample size and prioritized by HFTD Tier 2, randomized for reviews.

The inspection reports demonstrated consistent formatting and verbiage across all documents, ensuring clarity and ease of understanding. Each report included referenced descriptions and photos to confirm.

With the available inspection information provided by BVES through data requests, the initiative has been determined to be Met.

Table 24: Fuse TripSaver Automation Summary

Description	2023 Target	2023 Q4 QDR	DR027 Response	Summary
8.1.2.8 - Fuse TripSaver Automation	10 Installs	12 Installs	12 Installs	Target Met

8.1.6 - GD 35 - Asset Quality Assurance/ Quality Control

As described within the 2023 - 2025 WMP, BVES’s target for this initiative was to complete 20 Asset QCs on WMP Work. Per BVES’s 2023 Q4 QDR Dated February 1, 2024, provided in DR002, BVES reported the completion of 20 Asset QCs on WMP Work. As detailed within BVES’s response to Data Request DR028, BVES provided a list of 20 Asset QCs as summarized below in Table 25. As detailed within BVES’s response to Data Request DR028.1, BVES provided as-builts and material sheets for five (5) sample Asset QCs. The IE reviewed the as-builts and material sheets for the sample Asset QCs. No issues were identified in the review of the as-builts and material sheets for the sample Asset QCs.

Table 25: Asset Quality Assurance/ Quality Control Summary

Description	2023 Target	2023 Q4 QDR	DR028 Response	Summary
Asset Quality Assurance / Quality Control	20 Asset QCs	20 Asset QCs	20 Asset QCs	Target Met

8.2.3.4 - VM 10 - Fall-in Mitigation

As described within the 2023 - 2025 WMP, BVES’s target for this initiative was to remediate or remove 88 trees to prevent fall-in. Per BVES’s 2023 Q4 QDR Dated February 1, 2024, provided in DR002, BVES reported the completion of 168 trees for remediation or removal. As detailed within BVES’s response to Data Request DR029, BVES provided a list of the 168 removed trees as summarized below in Table 26.

As detailed within BVES's response to Data Request DR029.1, BVES noted the following: "The data provided are all BVES has for this initiative" referencing DR029 response. With the DR029 response file labeled 2023 Tree Removals, itemized the total trees removed of 168 total trees along with the completion dates from 2023, tree species, and trim style of "Removal." The IE reviewed all 168 tree removal details provided, including location, species, quantity, foreman, and completion date. No issues were identified in the review of the tree removal details.

Table 26: Fall-in Mitigation Summary

Description	2023 Target	2023 Q4 QDR	DR029 Response	Summary
Fall-in Mitigation	88 Trees	168 Trees	168 Trees	Target Met / Exceeded by 80 Trees

8.2.3.5 - VM 11 - Substation Defensible Space

As described within the 2023 - 2025 WMP, BVES’s target for this initiative was to inspect and clear 13 substations. Per BVES’s 2023 Q4 QDR Dated February 1, 2024, provided in DR002, BVES reported the completion of 13 substation inspections. As detailed within BVES’s response to Data Request DR030, BVES provided a list of 13 substation inspection completions as summarized below in Table 27. As detailed within BVES’s response to Data Request DR030.1, BVES provided inspection records for five (5) sample substation inspections. The IE reviewed the inspection records for the sample substation inspections indicating weed abatement was conducted in July 2023. No issues were identified in the review of the inspection records for the sample substation inspections.

Table 27: Substation Defensible Space Summary

Description	2023 Target	2023 Q4 QDR	DR030 Response	Summary
Substation Defensible Space	13 Substations	13 Substations	13 Substations	Target Met

8.2.5 - VM 16 - Vegetation Management Quality Assurance / Quality Control

The 2023 - 2025 WMP describes the following regarding this initiative: “In 2022, BVES set a target to conduct four quarterly QA assessments, and one annual program audit.” The

targets from 2022 are carried into 2023 per the 2023 - 2025 WMP. Per the Q4 2023 BVES Quarterly Notification Dated February 1, 2024, BVES reported the following: “BVES completed 1 audit in Q4 with a YTD total of 5 vegetation management audits in 2023. BVES met its target for 2023.” Per BVES’s 2023 Q4 QDR Dated February 1, 2024, provided in DR002, BVES reported a target of 5 Vegetation Management Audits and the completion of 5 Vegetation Management Audits.

As detailed within BVES’s response to Data Request DR031, BVES provided a copy of the Vegetation Management and Vegetation QA/QC Programs and the Vegetation Management Program Annual Audit 2023, as summarized below in Table 28. The IE reviewed the annual audit, which detailed annual audit questions and included Vegetation Management Quarterly Updates for Q1-Q4 2023 (classified by BVES as individual audits). The quarterly updates included details of Vegetation QC reviews, specifically the personnel who conducted the reviews and the completion dates. No issues were identified in the review of the QC records for the vegetation management QA/QC.

Table 28: Vegetation Management Quality Assurance / Quality Control Summary

Description	2023 Target	2023 Q4 QDR	DR031 Response	Summary
Vegetation Management Quality Assurance / Quality Control	5 Vegetation Management Audits	5 Vegetation Management Audits	5 Vegetation Management Audits	Target Met

8.3.3 - SAF 2 - Install Fault Indicators

As described within the 2023 - 2025 WMP, BVES’s target for this initiative was to install 30 fault indicators. Per BVES’s 2023 Q4 QDR Dated February 1, 2024, provided in DR002, BVES reported the installation of 35 fault indicators. As detailed within BVES’s response to Data Request DR032, BVES provided a list of 35 fault indicator installations at 12 locations as summarized below in Table 29. As detailed within BVES’s response to Data Request DR032.1, BVES indicated that the list provided in response to DR032 is the documentation of installation, including for the five (5) sample installations. BVES also provided photographic evidence of the fault indicators on lines at the poles as additional documentation. The IE reviewed the information provided for fault indicator installation. No issues were identified in the review of the documentation provided for fault indicator installation.

Table 29: Install Fault Indicators Summary

Description	2023 Target	2023 Q4 QDR	DR032 Response	Summary
Install Fault Indicators	30 Fault Indicators	35 Fault Indicators	35 Fault Indicators	Target Exceeded by 5 Fault Indicators

8.3.3 - SAF 3 - Online Diagnostic System

As described within the 2023 – 2025 WMP, BVES’s target for this initiative was to install continuous monitor sensors to provide usable grid insight information that is measured, reported, and documented for 2 circuits. Per BVES’s 2023 Q4 QDR, BVES reported completion of online diagnostic systems for 2 circuits. As detailed in BVES’s response to Data Request DR_033, BVES provided a list of 2 circuits with online diagnostic systems installed in 2023 as summarized below in Table 30. BVES confirmed that the initiative is a pilot and monitoring reports are in the process of being determined. The IE reviewed completion data for 2 circuits for online diagnostic systems. No issues were identified in the review of the completion data for online diagnostic systems.

Table 30: Online Diagnostic System Summary

Description	2023 Target ¹	2023 Q4 QNL	DR033 Response	Summary
Online Diagnostic System	1 Circuit	2 Circuits	2 Circuits	Target Exceeded by 1 Circuit

¹ As noted within the DR033 Response, BVES indicated “The WMP reported the number of circuits the diagnostic system was actually installed on, while the QDR had a target of 1 circuit in 2023. Additionally, this program is still a pilot, and we are still determining monitoring reports.”

8.5.3 - COE 2 - Engagement with Access and Functional Needs Populations

Data was gathered to assess initiative WMP COE_2 to review Engagement with AFN populations pertaining to wildfires and other emergency events. BVES has a goal of continued engagement with local stakeholders to prepare for and respond to fire-related events. Effective strategies can increase awareness and community resiliency to wildfires and Public Safety Power Shutoff (PSPS) events before, during, and following an emergency. Data Provided also a Plan to Support Access and Functional Needs Populations During De-Energization Events. many events included multiple communication types.

Several communication activities were noted in BVES plan. BVES is active in the engagement process and uses multiple engagement strategies to connect with AFN populations.

Data collected in response to requests regarding the initiative was evaluated to determine progress made towards meeting the initiative goals.

Findings from this analysis of Engagement with AFN populations demonstrates BVES have met the target for COE_2. Through a combination of traditional and digital channels, BVES has disseminated information, reaching a diverse audience across various platforms.

With the available inspection information provided by BVES through data requests, the initiative has been determined to be Met.

Table 31: Engagement with Access and Functional Needs Populations Summary

Description	2023 Target	2023 Q4 QDR	DR034 Response	Summary
Engagement with Access and Functional Needs Populations	12 AFN Customer Needs Verifications	24 AFN Customer Needs Verifications	20 Engagements	Target Met

8.5.5 - COE 4 - Best Practice Sharing with Other Utilities

Data was gathered to assess initiative WMP COE_4 to review BVES Working Groups/ Conferences. BVES is involved with and participates in several working groups and they use those groups to gather and share lessons for best practice. Many of the working groups are divided down to subgroups. A full list of the working groups and subgroups was provided along with supporting communications for the groups.

Data collected in response to requests regarding the initiative was evaluated to determine progress made towards meeting the initiative goals. Data provided also demonstrates many events included multiple communication types.

Findings from this analysis of Working Groups / Conferences has met the target. Through a combination of traditional and digital channels.

With the available inspection information provided by BVES through data requests, the initiative has been determined to be Met.

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Table 32: Best Practice Sharing with Other Utilities Summary

Description	2023 Target	2023 Q4 QDR	DR014 Response	Summary
Best Practice Sharing with Other Utilities	15 Working Groups, Conferences	120 Working Groups, Conferences	3 Groups/ Conferences	Target Met

Table 33: Small Volume Quantifiable Goal/Target Summary Table

Initiative Number/ID	Initiative Name	Population Size/Target	Sample Size	#, % Verified	#, % Verification Failed
GD_12	Substation Automation	3	2	2, 100%	0, 0%
GD_13	Switch and Field Device Automation	13	3	3, 100%	0, 0%
GD_14	Capacitor Bank Upgrade Project	6	2	2, 100%	0, 0%
GD_15	Fuse TripSaver Automation	10	3	3, 100%	0, 0%
GD_35	Asset Quality assurance/ quality control	20 Asset QCs	5 Asset QCs	5, 100%	0, 0%
VM_10	Fall-in mitigation	88 Trees	168 Trees	168, 100%	0, 0%
VM_11	Substation defensible space	13 Substations	5 Substations	5, 100%	0, 0%
VM_16	Vegetation Management Quality assurance / quality control	5 Audits	5 Audits	5, 100%	0, 0%
SAF_2	Install Fault Indicators	30 Fault Indicators	5 Fault Indicators	5, 100%	0, 0%
SAF_3	Online Diagnostic System	1 Circuit	2 Circuits	2, 100%	0, 0%
COE_2	Engagement with access and functional needs populations	12	3	3, 100%	0,0%
COE_4	Best practice sharing with other utilities	15	3	3, 100%	0,0 %

3.1.2.4 Qualitative Goal/Target

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2023 WMP, BVES provided a complete list of all 2023 WMP activities classified as Qualitative Goal/Target that were conducted in 2023. The 2023 WMP activities identified within the Qualitative list were assessed within this section and are presented below within Tables 34 to 41 grouped by the associated initiative category. The IE findings are defined as follows:

- Activity Validated – Qualitative work on the initiative began and ended in 2023.
- Activity In Progress – Qualitative work on the initiative began in 2023 and continues into 2024.
- Activity Ongoing – Qualitative work on the initiative is incorporated into operations to be repeated annually.
- Activity Delayed – Qualitative work on the initiative did not begin in 2023 and is expected to begin in the future.

Table 34: Overview of the Service Territory Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
5.4.5 - ST_1 - Environmental compliance and permitting	Requirements for environmental compliance, including descriptions of procedures to ensure adherence to environmental laws, the handling of roadblocks, and any notable changes to compliance procedures	<ul style="list-style-type: none"> ▪ Main Facility HMBP Annual Certification (BVES Facility HMBP Annual Certification_02-22-23.pdf) ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity Validated

Table 35: Risk Methodology and Assessment Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
6 - RMA_1 - Technosylva Contractor. Program implemented and ongoing.	Development and use of tools and processes to assess the risk of wildfire and PSPS across an electrical corporation's service territory.	<ul style="list-style-type: none"> ▪ BVES Response to DR037 Section 6 RMA-1 ▪ Review of C#3234-000 REV FULLY EXECUTED_1.pdf ▪ Review of 2023 vs 2022 FireSight Training.docx ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity in Progress

Table 36: Wildfire Mitigation Strategy Development Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
7 - WMSD_1 - Wildfire Mitigation Strategy Development	Development and use of processes for deciding on a portfolio of mitigation initiatives to achieve maximum feasible risk reduction and that meet the goals of the WMP.	<ul style="list-style-type: none"> ▪ BVES Response to DR038 Section 7 WMSD-1.xlsx ▪ Installation of Green Grid ICU cameras on two circuits in November 2023. ▪ Monthly meetings with contractor (Technosylva) to evaluate efficacy of ignition detection systems. ▪ Semi-annual evaluation of assets, monitor customer interruption duration index, and risk reduction¹. ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity in Progress

Table 37: Grid Design, Operations, and Maintenance Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
8.1.2.1 - GD_2 - Radford Line Replacement Project	BVES plans to replace bare wire with a high-performance covered conductor on the Radford 34kV sub-transmission line.	<ul style="list-style-type: none"> ▪ Per DR002 Response, BVES indicated that "no work was performed in 2023" in BVES's DRU002 2023_WMP_Initiatives_spreadsheet_updated_4-22-24 which aligns with BVES's self-reporting from BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 that had no recorded actuals in 2023. ▪ BVES's 2023 ARC Dated April 2, 2024, identifies that this initiative was delayed due to US Forest Service permitting approval. 	Activity Delayed
8.1.2.2 - GD_3 - Minor Undergrounding Upgrades Projects	Actions taken to convert overhead electric lines and/or equipment to underground electric lines and/or equipment (i.e., located underground and in accordance with GO 128).	<ul style="list-style-type: none"> ▪ Per 2023 Q4 QDR Table 1, no projects were proposed or initiated for this in initiative in 2023. 	N/A
8.1.2.3 - GD_5 - Radford Line Replacement Project	Radford Line Replacement Project replaces fire resistant (ductile iron) poles because it is located in an area designated as High Fire Threat District Tier 3 ("extreme fire risk") by the CPUC.	<ul style="list-style-type: none"> ▪ Per DR002 Response, BVES indicated that "no work was performed in 2023" in BVES's DRU002 2023_WMP_Initiatives_spreadsheet_updated_4-22-24 which aligns with BVES's self-reporting from BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 that had no recorded actuals in 2023. 	Activity Delayed

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		<ul style="list-style-type: none"> BVES's 2023 ARC Dated April 2, 2024, identifies that this initiative was delayed due to US Forest Service permitting approval. 	
8.1.2.4 - GD_7 - NA	BVES does not own or operate any transmission lines.	<ul style="list-style-type: none"> Per 2034 Q4 QDR Table 1, this initiative does not have a target or work completed for 2023. 	N/A
8.1.2.5 - GD_8 - Traditional overhead hardening	Maintenance, repair, and replacement of capacitors, circuit breakers, cross-arms, transformers, fuses, and connectors (e.g., hot line clamps) with the intention of minimizing the risk of ignition.	<ul style="list-style-type: none"> Table detailing Work Order numbers and Descriptions for Traditional Overhead Hardening in response to DR041 in Attachment Traditional Overhead Hardening.xlsx Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES's Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	Activity Validated
8.1.2.6 - GD_9 - Emerging grid hardening technology installations and pilots	Development, deployment, and piloting of novel grid hardening technology.	<ul style="list-style-type: none"> Not in 2023 Scope Program not started in 2023 Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	N/A
8.1.2.7 - GD_10 - Bear Valley Solar Energy Project	Pursue development and execution of the Bear Valley Solar Energy Project. Develop an Energy Storage and Solar Generating Facility Project to reduce	<ul style="list-style-type: none"> Erwin Ranch Sikar Project and Big Bear Storage Project (BVES Solar and Storage Project 051524.pdf) Outlines plans to submit the project to the California Public Utilities Commission (CPUC) and the County of San Bernardino by 5/22/2024 Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in 	Activity in Progress

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	the risk of disruptive events, such as Public Safety Power Shutoffs (PSPS), and enhance grid resilience.	BVES_2023_Q4_Tables 1-15_R0.xlsx	
8.1.2.7 - GD_11 - Energy Storage Project	Pursue development and execution of the Bear Valley Solar Energy Project. Develop the Bear Valley Energy Storage Facility, a project designed to enhance grid resilience, reduce the impact of Public Safety Power Shutoffs (PSPS).	<ul style="list-style-type: none"> ▪ Bear Valley Electric Service Inc, Accelerate Clean Energy Production through Solar and Battery Storage Expansion, For Immediate Release March 28, 2024 (BVES Battery Storage and Solar Energy Planning and Development Press Release.PDF) ▪ Written response, reviewed 05/17, 2024 (BESS Objective.PDF) ▪ Written response, reviewed 05/17, 2024 (BESS PSPS impact.PDF) ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity in Progress
8.1.2.8 - GD_16 - Server Room	The Server Room Project is designed to expand, upgrade, and improve security and reliability of the current computer server room capabilities. Looking ahead, it is clear that Bear Valley will need to continue to significantly expand the automation of substations and field devices, eventually install Advanced Metering.	<ul style="list-style-type: none"> ▪ BVES Response to DR044 ▪ Review of server room information PowerPoint attachment: BVES server room information.pptx ▪ Review of server room equipment list spreadsheet attachment: Server Room Equipment .xlsx.pptx ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity in Progress

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8.1.2.9 - GD_18 - Line removals (in HFTD)	BVES - Has no activity planned for this Initiative at this time per 2023-2025 WMP.	<ul style="list-style-type: none"> ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	N/A
8.1.2.11 - GD_20 - Other grid topology improvements to mitigate or reduce PSPS events	Actions taken to mitigate or reduce PSPS events in terms of geographic scope and number of customers affected not covered by another initiative.	<ul style="list-style-type: none"> ▪ BVES Response to DR046 ▪ No projects planned or conducted¹ ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx <p>¹2023 WMP Table 8.3 Grid Design, Operations and Maintenance Targets by Year, Page 118</p>	Activity in Progress
8.1.2.12 - GD_21 - BVPP Phase 4 Upgrade Project	Reduce the impacts of power outages from proactive de-energization and preserving essential services by improving the reliability of the Bear Valley Power Plant (BVPP).	<ul style="list-style-type: none"> ▪ Bear Valley Electric Service, Inc. Individual Contract Change Order (C#20288-007 – OS -FULLY EXECUTED.pdf) ▪ Invoice, Date 12/15/2022 (SDP invoice for phase 3.pdf) ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity in Progress
8.1.2.12 - GD_23 - Safety and Technical Upgrades to Lake Substation	Project Milestones for Lake Substation	<ul style="list-style-type: none"> ▪ A written response highlighted that the upgrades are postponed by 4 to 5 quarters due to supply chain issues, resulting in no reportable actions for 2023. Reviewed May 24, 2024 (DR048 – BVES Response.xlsx) ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity Delayed
8.1.2.12 - GD_24 - Partial Safety and Technical Upgrades to	Other grid design and system hardening actions which the electrical corporation takes to reduce its ignition	<ul style="list-style-type: none"> ▪ Not in 2023 Scope ▪ Program not started in 2023 ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	N/A

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Village Substation	and PSPS risk not otherwise covered by other initiatives in this section.		
8.1.4 - GD_33 - Equipment maintenance and repair	Remediation, adjustments, or installation of new equipment to improve or replace existing connectors, including hotline clamps.	<ul style="list-style-type: none"> ▪ 2023 GD-33 O&M Spending.xlsx ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity in Progress
8.1.5 - GD_34 - Asset management and inspection enterprise system(s)	Operation of and support for centralized asset management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.	<ul style="list-style-type: none"> ▪ Not in 2023 Scope ▪ Program not started in 2023 ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	N/A
8.1.7 - GD_36 - Asset Open work orders	Asset Open Work Orders	<ul style="list-style-type: none"> ▪ QA/QC Procedure for GD_36 Asset Open Work Orders.pdf ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity in Progress
8.1.8.1 - GD_37 - Equipment Settings to Reduce Wildfire Risk	Equipment Settings to Reduce Wildfire Risk	<ul style="list-style-type: none"> ▪ Bear Valley Electric Service, Inc. Public Safety Power Shutoff Plan.PDF ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity Validated
8.1.8.2 - GD_38 - Grid Response Procedures and Notifications	Grid Response Procedures and Notifications	<ul style="list-style-type: none"> ▪ Bear Valley Electric Service, Inc. Emergency and Disaster Response Plan.pdf 	Activity Validated

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		<ul style="list-style-type: none"> ▪ Written response, reviewed 05/17, 2024 (Firefighting Coordination Protocols.docx) ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	
8.1.8.3 - GD_39 - Personnel Work Procedures and Training in Conditions of Elevated Fire Risk	<p>Work activity guidelines that designate what type of work can be performed during operating conditions of different levels of wildfire risk. Training for personnel on these guidelines and the procedures they prescribe, from normal operating procedures to increased mitigation measures to constraints on work performed.</p>	<ul style="list-style-type: none"> ▪ Table detailing 2023 PSPS Meeting Dates and Topics in response to DR053 in Attachment ATTACHMENT1_PSPS_Meetings_CY2023_030524.pdf ▪ BEAR VALLEY ELECTRIC SERVICE, INC. (U 913 E) PUBLIC SAFETY POWER SHUTOFF POST-SEASON REPORT, Dated March 5, 2024, in response to DR053 in Attachment BVES PUBLIC SAFETY POWER SHUTOFF 2023 POST-SEASON REPORT.pdf ▪ Bear Valley Electric Service, Inc. Public Safety Power Shutoff Plan, Dated January 31, 2023, in response to DR053 in Attachment bves-inc-2023-psps-procedures-final-022623-signed.pdf ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES's Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	Activity Validated
8.1.9 - GD_40 - Asset Workforce Planning	Programs to ensure that the electrical corporation has	<ul style="list-style-type: none"> ▪ Bear Valley Electric Service, Inc. Individual Contract, Outsource Utility Contractor Corp, Dated April 	Activity Ongoing

	<p>qualified asset personnel and to ensure that both employees and contractors tasked with asset management responsibilities are adequately trained to perform relevant work.</p>	<p>9, 2019, in response to DR054 in Attachment C#2967-000 For Outsource Signed.pdf</p> <ul style="list-style-type: none"> ▪ Bear Valley Electric Service, Inc. Individual Contract Change Order, Outsource Utility Contractor Corp, Dated April 27, 2021, in response to DR054 in Attachment C#2967-004 FULLY EXECUTED.pdf ▪ Bear Valley Electric Service, Inc. Individual Contract, Change Order, Outsource Utility Contractor Corp, Dated March 10, 2022, in response to DR054 in Attachment C#2967-006 FULLY EXECUTED.pdf ▪ Bear Valley Electric Service, Inc. Individual Contract, Change Order, Outsource Utility Contractor Corp, Dated August 23, 2022, in response to DR054 in Attachment C#2967-007 FULLY EXECUTED.pdf ▪ Amendment #1 to Outsource Utility Contractor Corp Contract No. 2967-000, Dated April 20, 2024, in response to DR054 in Attachment C#2967-008-Amendment #1 - FULLY EXECUTED.pdf ▪ Bear Valley Electric Service, Inc. Individual Contract, Outsource Utility Contractor Corp, Dated April 9, 2019, in response to DR054 in Attachment C#2968-000 For Outsource Signed.pdf ▪ Bear Valley Electric Service, Inc. Individual Contract Change Order, Outsource Utility Contractor Corp, Dated July 10, 2023, in response to DR054 in Attachment C#2968-014 - FULLY EXECUTED.pdf ▪ Amendment #1 to Outsource Utility Contractor Corp Contract 	
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		<p>No. 2968-000, Dated April 30, 2024, in response to DR054 in Attachment C#2968-016 - Amendment #1 -FULLY EXECUTED.pdf</p> <ul style="list-style-type: none"> ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES’s Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	
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Table 38: Vegetation Management and Inspection Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
8.2.3.1 - VM_7 - Pole clearing	Plan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).	<ul style="list-style-type: none"> ▪ Spreadsheet detailing BVES’s response for DR055 in Attachment DR055 – BVES Response.xlsx ▪ Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs dated October 6, 2021, in response to DR055 in Attachment BVES INC Vegetation Management and Vegetation Management QC Programs Policy and Procedures Rev1.pdf ▪ Training Sign-Up Sheet for Vegetation Management Training Policies and Procedures dated October 16, 2023, in response to 	Activity Validated

		<p>DR055 in Attachment BVES Vegetation Management Review and Training.pdf</p> <ul style="list-style-type: none"> ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES’s Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	
<p>8.2.3.2 - VM_8 - Wood and slash management</p>	<p>Actions taken to manage all downed wood and “slash” generated from vegetation management activities.</p>	<ul style="list-style-type: none"> ▪ Spreadsheet detailing BVES’s response for DR056 in Attachment DR056 – BVES Response.xlsx ▪ Bear Valley Electric Service, Inc. Individual Contract, The Original Mowbray’s Tree Service, Inc Dated November 13, 2020, showing contractor requirement to remove “slash” from work locations in response to DR058 in Attachment Vegetation Management Contract.pdf ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES’s Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) 	<p>Activity Ongoing</p>

		<ul style="list-style-type: none"> ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	
8.2.3.6 - VM_12 - High-risk species	<p>Actions taken to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation.</p>	<ul style="list-style-type: none"> ▪ Spreadsheet detailing BVES's response for DR057 in Attachment DR057 – BVES Response.xlsx ▪ Bear Valley Electric Service, Inc. Vegetation Management and Vegetation QA/QC Programs dated October 6, 2021, in response to DR057 in Attachment BVES INC Vegetation Management and Vegetation Management QC Programs Policy and Procedures Rev1.pdf ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES's Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	Activity Validated
8.2.3.7 - VM_13 - Fire-resilient rights-of-way	<p>Actions taken to promote vegetation communities that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way.</p>	<ul style="list-style-type: none"> ▪ Per DR002 Response, BVES indicated that "Program Not Started in 2023" in BVES's DRU002 2023_WMP_Initiatives_spreadsheet_updated_4-22-24 which aligns with BVES's self-reporting from BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	N/A

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		that had no recorded actuals in 2023.	
8.2.3.8 - VM_14 - Emergency response vegetation management	Planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration.	<ul style="list-style-type: none"> ▪ Spreadsheet detailing BVES’s response for DR058 in Attachment DR058 – BVES Response.xlsx ▪ Bear Valley Electric Service, Inc. Individual Contract, The Original Mowbray’s Tree Service, Inc Dated November 13, 2020, showing emergency vegetation management procedure in response to DR058 in Attachment Vegetation Management Contract.pdf ▪ Training Sign-Up Sheet for Vegetation Management Training Policies and Procedures dated October 16, 2023, in response to DR058 in Attachment BVES Vegetation Management Review and Training.pdf ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES’s Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	Activity Validated
8.2.4 - VM_15 - Vegetation management enterprise system	Operation of and support for centralized vegetation management and inspection	<ul style="list-style-type: none"> ▪ Spreadsheet detailing BVES’s response for DR059 in Attachment DR059 – BVES Response.xlsx ▪ Bear Valley Electric Service, Inc. Individual Contract, The Original 	Activity Validated

	<p>enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.</p>	<p>Mowbray’s Tree Service, Inc Dated November 13, 2020, showing documentation procedure in response to DR059 in Attachment Vegetation Management Contract.pdf</p> <ul style="list-style-type: none"> ▪ Training Sign-Up Sheet for Vegetation Management Training Policies and Procedures dated October 16, 2023, in response to DR059 in Attachment BVES Vegeation Management Review and Training.pdf ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES’s Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	
<p>8.2.6 - VM_17 - Vegetation Management Open work orders</p>	<p>Actions taken to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.</p>	<ul style="list-style-type: none"> ▪ Spreadsheet detailing BVES’s response for DR060 in Attachment DR060 – BVES Response.xlsx ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES’s Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) 	<p>Activity Validated</p>

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		<ul style="list-style-type: none"> ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	
<p>8.2.7 - VM_18 - Vegetation Management Workforce planning</p>	<p>Programs to ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.</p>	<ul style="list-style-type: none"> ▪ Spreadsheet detailing BVES's response for DR061 in Attachment DR061 – BVES Response.xlsx ▪ Log of vegetation management crews dated June 20, 2023, in response to DR061 in Attachment BVES Vegetation Crew Log.pdf ▪ Bear Valley Electric Service, Inc. Individual Contract, The Original Mowbray's Tree Service, Inc Dated November 13, 2020, in response to DR061 in Attachment C#3095-000 For Signature-Fully Executed.pdf ▪ Amendment 1 to The Original Mowbray's Tree Service, Inc Contract No. 3095 Dated November 15, 2023, in response to DR061 in Attachment C#3095-003 - Amendment #1 -FULLY EXECUTED.pdf ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES's Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	<p>Activity Ongoing</p>

Table 39: Situational Awareness and Forecasting Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
8.3.2 - SAF_1 - Advanced weather monitoring and weather stations	Project installs and maintains 20 weather stations.	<ul style="list-style-type: none"> ▪ Workbook detailing maintenance for 20 weather stations in 2023 in response to DR062 in Attachment BVES Weather Station Maintenance 2023 2024.xlsx ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES's Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	Activity Validated
8.3.4 - SAF_4 - HD ALERTWildfire Cameras	Project installs 15 HD ALERTWildfire Cameras to provide complete coverage of the BVES Service Area.	<ul style="list-style-type: none"> ▪ Spreadsheet detailing BVES's response for DR063 in Attachment DR063 – BVES Response.xlsx ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES's Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) confirms that all planned HD ALERTWildfire 	N/A

		<p>Cameras were installed in 2022.</p> <ul style="list-style-type: none"> ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 has no targets or completed work for this initiative. 	
8.3.5 - SAF_5 - Weather forecasting	<p>Program leverages Technosylva’s software capabilities and solutions, which have been implemented across California in other electric utilities, to provide: (1) On-demand, real time wildfire behavior modeling, predictive spread conditions, and derivation of potential impacts analysis; (2) Ability to conduct simulations on-demand, to reflect changing conditions or local data observations, including proactive “what if” scenarios; and (3) Weather and wildfire risk forecasting for BVES’s assets and the service territory using daily weather prediction integration to support PSPS activation calls and</p>	<ul style="list-style-type: none"> ▪ Spreadsheet detailing BVES’s response for DR064 in Attachment DR064 – BVES Response.xlsx ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES’s Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	Activity in Progress

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	response operations.		
8.3.6 - SAF_6 - Fire potential index	Calculation and application of a landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions.	<ul style="list-style-type: none"> ▪ Spreadsheet detailing BVES’s response for DR065 in Attachment DR065 – BVES Response.xlsx ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES’s Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	Activity in Progress

Table 40: Emergency Preparedness Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
8.4.2 - EP_1 - Emergency preparedness plan	Development and integration of wildfire- and PSPS-specific emergency strategies, practices, policies, and procedures into the electrical corporation’s overall emergency plan based on	<ul style="list-style-type: none"> ▪ Bear Valley Electric Service, Inc. Emergency & Disaster Response Plan Dated March 31, 2022, in response to DR066 in Attachment bvers-inc-emergencyresponseanddisasterplan-rev2.pdf ▪ Bear Valley Electric Service, Inc. Public Safety Power Shutoff Plan Dated January 31, 2023, in response to DR066 in Attachment bves-inc-2023-psps-procedures-final-022623-signed.pdf ▪ Emergency Response Plan Review and Evaluation table in response to DR066 in Attachment Emergency 	Activity in Progress

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	the minimum standards described in GO 166.	<p>Response Plan Review and Evaluation.xlsx</p> <ul style="list-style-type: none"> ▪ Q4 2023 BVES Quarterly Notification to the Office of Energy Infrastructure Safety Regarding BVES's Implementation of its Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8389(e)(7) Dated February 1, 2024 (Attachment A: Initiative Summary of Progress for Individual Mitigation Measures during Q4 2023) ▪ BVES Quarterly Data Report (QDR) Q4, 2023 provided in bves_2023_q4_tables1-15_r0 	
8.4.3 - EP_2 - External collaboration and coordination	Actions taken to coordinate wildfire and PSPS emergency preparedness with relevant public safety partners including the state, cities, counties, and tribes.	<ul style="list-style-type: none"> ▪ Review of Bear Valley Electric Service, Inc in response to DR067 in Attachment: Bear Valley Electric Service, Inc. FINAL_Q3 2023 Joint IOU AFN Collaborative Council_September 2023.PDF ▪ Review of IOU document in response to DR067 in Attachment: WMP collaboration with outside agencies 2023.docx ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity Validated
8.4.4 - EP_3 - Public emergency communication strategy	Development and integration of a comprehensive communication strategy to inform essential customers and other stakeholder groups of wildfires, outages due to	<ul style="list-style-type: none"> ▪ Review of Bear Valley Electric Service, Inc. Emergency and Disaster Response Plan in response to DR068 in Attachment: BVERS INC Emergency And Disaster Response Plan Rev2.PDF ▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity Validated

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	wildfires, and PSPS and service restoration, as required by Public Utilities Code section 768.6.		
8.4.5 - EP_4 - Preparedness and planning for service restoration	Development and integration of the electrical corporation's plan to restore service after an outage due to a wildfire or PSPS event.	<ul style="list-style-type: none"> Review of Bear Valley Electric Service, Inc. Community brief memo in response to DR069 in attachment: WMP community brief 6.docx 6-29-2023 participant list.docx Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity Validated
8.4.6 - EP_5 - Customer support in wildfire and PSPS emergencies	Development and deployment of programs, systems, and protocols to support residential and non-residential customers in wildfire emergencies and PSPS events.	<ul style="list-style-type: none"> Review of Bear Valley Electric Service, Inc. Community brief memo in response to DR069 in attachment: WMP community brief 6.docx 6-29-2023 participant list.docx Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx 	Activity Validated

Table 41: Community Outreach & Engagement Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
8.5.4 - COE_3 - Collaboration on local wildfire mitigation planning	Development and integration of plans, programs, and/or policies for collaborating with communities on local wildfire mitigation planning, such as wildfire safety	<ul style="list-style-type: none"> BVES Response to DR071 Local Wildfire Mitigation Planning.docx outlining BVES participating in Big Bear Valley 	Activity in Progress

	elements in general plans, community wildfire protection plans, and local multi-hazard mitigation plans.	Mountain Mutual Aid Association <ul style="list-style-type: none">▪ Bear Valley Quarterly Data Report (QDR) Q4, 2023 provided in BVES_2023_Q4_Tables 1-15_R0.xlsx	
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3.1.3 Trends and Themes

The IE team evaluated Quantifiable Goals/Targets for 32 initiatives (Large Volume Field, Large Volume Not Field, and Small Volume) and Qualitative Goals/Targets for 36 initiatives related to BVES’s 2023 WMP. The IE reviewed publicly available documents, online articles, and related published reports as referenced throughout the section and detailed in Appendix B, List of Supplemental Documents Reviewed. Concurrently, the IE submitted data requests and reviewed the BVES provided confidential responses with various verification documentation, multiple reports that included spreadsheets, inspection logs, photos, and verification lists with a summary of received documentation below in Figure 11. Validation was also conducted through SME interviews, as listed within Appendix D.

Note: BVES-provided documentation included in the corresponding initiative DRUs to IE Data Requests are noted as confidential.

Information reviewed during the evaluation of the initiatives underscores the ongoing nature of their efforts associated with the qualitative goals/targets. BVES has approached the quantitative and qualitative goals systematically, relying on established processes where appropriate, developing new strategies to fill in, monitoring outcomes, and refining the approach to incorporate feedback to be carried forward to future wildfire mitigation efforts. BVES continues to explore means and methods to improve modeling programs, conduct quality assurance inspections for transmission and distribution systems, and enhanced procedures, standards, and overall governance processes for wildfire mitigation.

BVES's trend across the 2023 WMP activities identified within this section complies with the stated goals identified within the 2023 WMP.

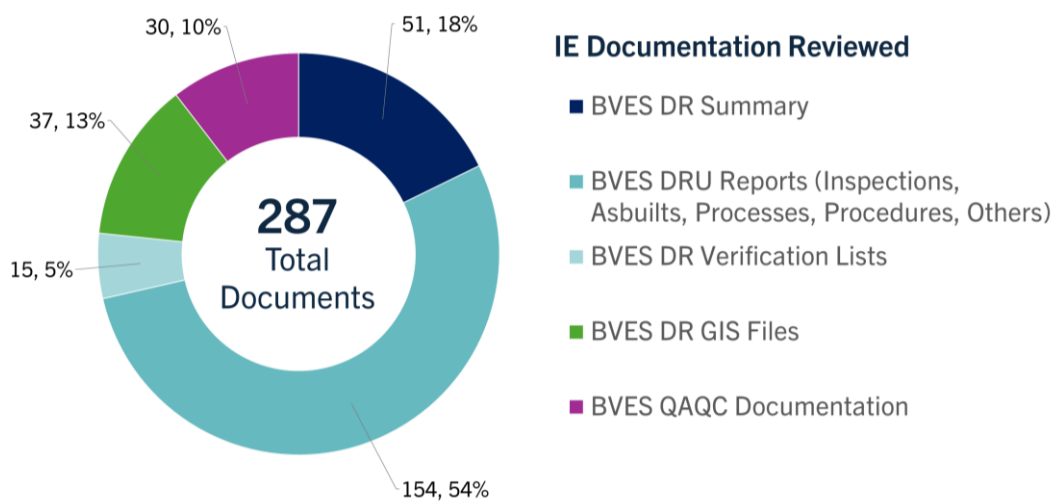


Figure 11: IE Documentation Reviewed for Large Volume Field, Large Volume Not Field, Small Volume, and Qualitative

3.2 Verification of Funding

The IE team conducted a comprehensive review of the funding for each initiative of the 2023 WMP to evaluate and verify alignment with planned expenditures. This year, the IE assessed the public data and augmented its assessment with data requests to obtain clarification and detailed explanations for initiatives with a total spend of less than 100 percent of planned budgets. This enhanced approach facilitated a more precise evaluation of discrepancies between actual and planned financials across the various documents and records reviewed.

The initial assessment involved a comparative analysis of public records issued by BVES (from February 2023 to date), which the IE compared to information BVES provided in response to the IE's data requests for financials. The review included an analysis of actual and planned spend, separated into Expense (OPEX) and Capital (CAPEX) costs, to provide a comprehensive understanding of spending trends. Table 42 - 2023 WMP Funding Verification Summary includes the details of the type of expenditure, whether Capital or Expense, the amount planned, the actual spend amount, and the explanation provided by BVES associated with each documented underspend instance.

3.2.1 Summary of Underspend Instances

To evaluate BVES's 2023 WMP, dated November 16, 2023, the IE team evaluated financial data for 76 initiatives. The IE reviewed publicly available documents and related attachments listed as Items No. 1 and 3 as detailed in Appendix B, List of Supplemental Documents Reviewed. Concurrently, the IE submitted data requests and reviewed the responses BVES provided in DR074 and DR079. Following Energy Safety's direction, the IE documented all instances, a total of 13, where BVES provided less than 100% of the funding for WMP activities and verified BVES's explanations for these underspent amounts.

Table 42: 2023 WMP Funding Verification Summary
(Thousands of Dollars)

Initiative Category	2023 Initiative Number/ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
Grid Design, Operations, and Maintenance	GD_2	Radford Line Replacement Project	Capital	\$4,340	\$117	CAPEX Underrun: Radford project was delayed beyond 2023 due to permit in processing with	No

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						US Forest Service. BVES obtained permit on January 3, 2024. Project will be completed in 2024.	
Grid Design, Operations, and Maintenance	GD_5	Radford Line Replacement Project	Capital	\$1,860	\$50	CAPEX Underrun: Radford project was delayed beyond 2023 due to permit in processing with US Forest Service. BVES obtained permit on January 3, 2024. Project will be completed in 2024.	No
Grid Design, Operations, and Maintenance	GD_6	Evacuation Route Hardening Project	Capital	\$816	\$406	CAPEX Underrun: Annual target for 2023 was achieved (actually exceeded) at lower than budgeted. Labor was less than originally estimated.	Yes
Grid Design, Operations, and Maintenance	GD_13	Switch and Field Device Automation	Capital	\$711	\$667	Actual cost to achieve the required scope of work for installation of system automation equipment was less than projected. Full scope of work and initiative	Yes

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						target was achieved.	
Grid Design, Operations, and Maintenance	GD_14	Capacitor Bank Upgrade Project	Capital	\$345	\$166	CAPEX Underrun: Annual target for 2023 was achieved at lower than budgeted. Labor was less than originally estimated.	Yes
Grid Design, Operations, and Maintenance	GD_16	Server Room	Capital	\$127	\$24	CAPEX Underrun: Project is ongoing and will be completed in 2024. Therefore, budgeted costs for the project were not fully realized in 2023.	Yes
Grid Design, Operations, and Maintenance	GD_28	UAV HD Photography/ Videography	Expense	\$56	\$22	Actual cost to achieve the required scope of work for asset inspections was less than projected. Full scope of work and initiative target was achieved.	Yes
Grid Design, Operations, and Maintenance	GD_30	3rd Party Ground Patrol	Expense	\$47	\$22	OPEX Underrun: BVES was able to contract the work for lower cost than projected. Intended scope of work and annual target was achieved.	Yes
Vegetation Management and Inspection	VM_3	UAV HD Photography/ Videography	Expense	\$58	\$55	Actual cost to achieve the required scope of work for	Yes

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						vegetation inspections was less than projected. Full scope of work and initiative target was achieved.	
Vegetation Management and Inspection	VM_5	3rd Party Ground Patrol	Expense	\$47	\$22	OPEX Underrun: BVES was able to contract the work for lower cost than projected. Intended scope of work and annual target was achieved.	Yes
Vegetation Management and Inspection	VM_11	Substation defensible space	Expense	\$15	\$14	Actual cost to achieve the required scope of work for substation defensible space was less than projected. Full scope of work and initiative target was achieved.	Yes
Situational Awareness and Forecasting	SAF_2	Install Fault Indicators	Capital	\$360	\$20	CAPEX Underrun: Annual target for 2023 was achieved (actually exceeded) at lower than budgeted. Labor was less than originally estimated.	Yes
Situational Awareness and Forecasting	SAF_3	Online Diagnostic System	Capital	\$78	\$24	CAPEX Underrun: Annual target for 2023 was achieve at lower	Yes

						than budgeted. Contractor costs were less than originally estimated.	
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Trends in Expense and Capital Underspend

In addition to the detailed review and analysis documented in Table 42, the IE team has visualized the underspend instances across various WMP categories in the following graphs titled "Breakdown of Expense for IE Underspend Categories (Thousands of Dollars)" and "Breakdown of Capital for IE Underspend Categories (Thousands of Dollars)." This graph provides a clear representation of the underspend instances and the concentrations observed in the 2023 WMP initiatives, categorizing the underspend amounts across different expenditure ranges.

Trends of Expense Breakdown Shown in Figure 12

The "Breakdown of Expense for IE Underspend Categories" graph highlights significant underspend across multiple categories, with the most notable discrepancies in Vegetation Management and Inspection, and Grid Design, Operations, and Maintenance.

1. **\$1K - \$5K Range:** All categories show minimal underspend, indicating better alignment of planned and actual expenditures for smaller budget initiatives.
2. **\$20K - \$50K Range:** Vegetation Management and Inspection (\$24.7K) across one (1) initiative and Grid Design, Operations, and Maintenance (\$59K) across two (2) different initiatives.

Figure 12: Breakdown of Expense for IE Underspend Categories
(Thousands of Dollars)

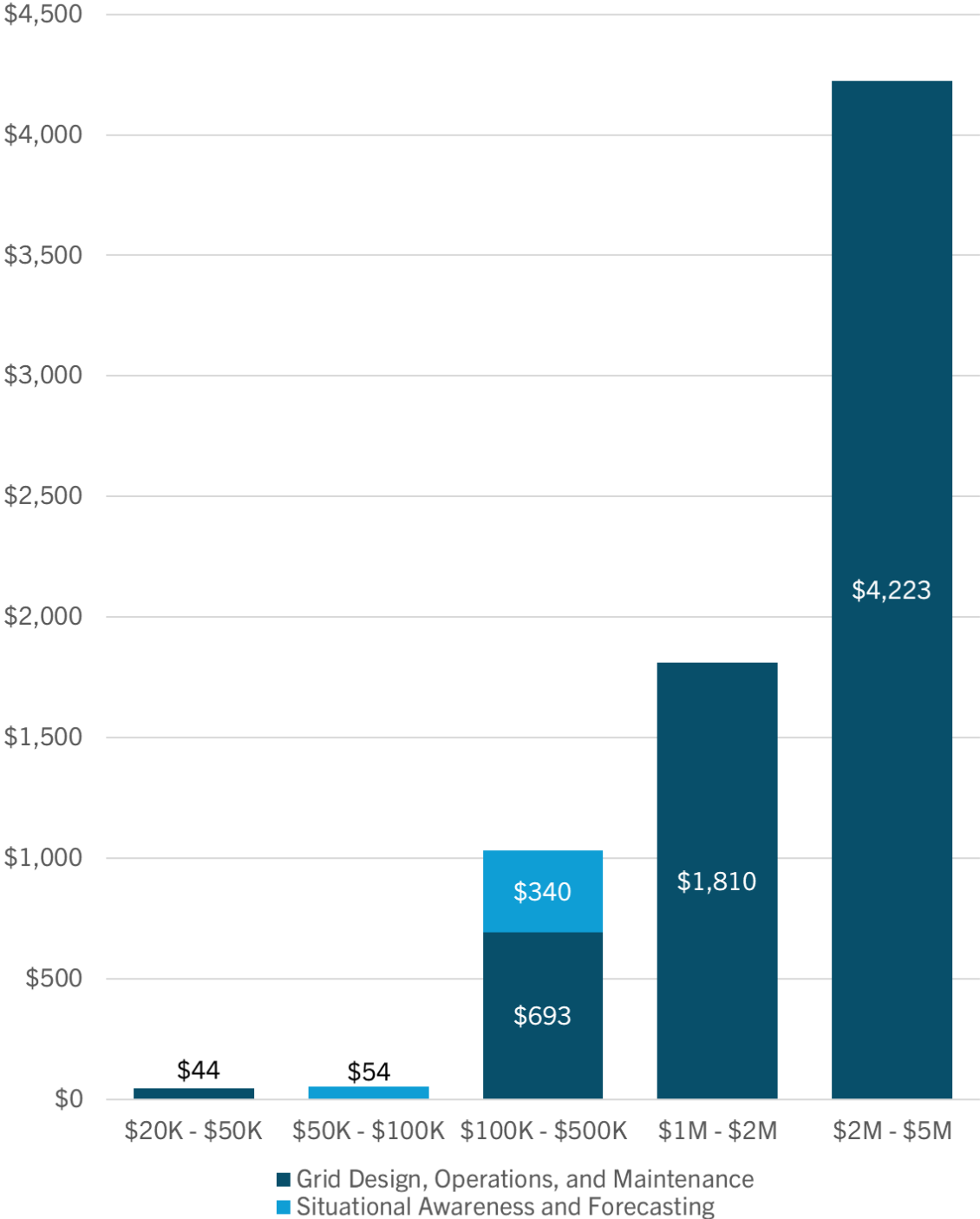


Trends of Capital Breakdown Shown in Figure 13

The "Breakdown of Capital for IE Underspend Categories" graph provides insights into the capital expenditure underspend across various WMP categories. The data is categorized into different expenditure ranges, highlighting significant trends in financial discrepancies for capital projects.

1. **\$20K - \$50K Range:** Grid Design, Operations, and Maintenance (\$44K) across one (1) initiative.
2. **\$50K - \$100K Range:** Situational Awareness and Forecasting (\$54K) across one (1) initiative.
3. **\$100K - \$500K Range:** Situational Awareness and Forecasting (\$340K) across one (1) initiative, and Grid Design, Operations, and Maintenance (\$693K) across three (3) different initiatives.
4. **\$1M - \$2M Range:** Grid Design, Operations, and Maintenance (\$1.8M) across one (1) initiative due to delays in the Radford project from permit processing with US Forest Service.
5. **\$2 - \$5M Range:** Grid Design, Operations, and Maintenance (\$4.2M) across one (1) initiative due to delays in the Radford project from permit processing with US Forest Service.

Figure 13: Breakdown of Capital for IE Underspend Categories (Thousands of Dollars)



3.3 Verification of QA/QC Programs

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2023 WMP, BVES provided a complete list of all 2023 WMP activities with corresponding quality assurance and quality control (QA/QC) programs per DR003 Response and assessed herein through Data Requests and SME interviews.

Table 43: 2023 QA/QC Initiative Verification Summary Table

Initiative Name	Initiative Validation	Finding
5.4.5 - ST_1 - Environmental compliance and permitting	<ul style="list-style-type: none"> Documented in Bear Valley’s Confidential Response in DR003b in attachment ST_1 QAQC Environmental Compliance and Permitting R0.pdf 	Activity Validated
6 - RMA_1 - Technosylva Contractor. Program implemented and ongoing	<ul style="list-style-type: none"> Documented in Bear Valley’s Confidential Response in DR003b in attachment RMA_1 QAQC Technosylva Contractor. Program implemented and ongoing R0.pdf 	Activity Validated
7 - WMSD_1 - Wildfire Mitigation Strategy Development	<ul style="list-style-type: none"> Per BVES’s response to DR003 	N/A
8.1.2.1 - GD_1 - Covered Conductor Replacement Project	<ul style="list-style-type: none"> Documented in BVES’s Response to DR004 in attachment GD_1 Covered Conductor Replacement Project QAQC Procedures R0.pdf 	Activity Validated
8.1.2.1 - GD_2 - Radford Line Replacement Project	<ul style="list-style-type: none"> Per BVES’s response to DR003 	N/A
8.1.2.2 - GD_3 - Minor Undergrounding Upgrades Projects	<ul style="list-style-type: none"> Per 2034 Q4 QDR Table 1, no projects were proposed or initiated for this in initiative in 2023. 	N/A
8.1.2.3 - GD_4 - Distribution Pole Replacements and Reinforcements	<ul style="list-style-type: none"> Documented in BVES’s Response to DR005 in attachment GD_4 Covered Conductor Replacement Project QAQC Procedures Rev 0 (003).pdf 	Activity Validated
8.1.2.3 - GD_5 - Radford Line Replacement Project	<ul style="list-style-type: none"> Per BVES’s response to DR003 	N/A
8.1.2.3 - GD_6 - Evacuation Route Hardening Project	<ul style="list-style-type: none"> Documented in BVES’s Response to DR006 in attachment GD_6 Evacuation Route Hardening Project QAQC Procedures R0.pdf 	Activity Validated

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8.1.2.4 - GD_7 - NA	<ul style="list-style-type: none"> ▪ Per 2023 Q4 QDR Table 1 this initiative does not have a target or work completed. 	N/A
8.1.2.5 - GD_8 - Traditional overhead hardening	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR041 in attachment GD_3 Minor Undergrounding Upgrades Projects QAQC Procedures R0.pdf 	Activity Validated
8.1.2.6 - GD_9 - Emerging grid hardening technology installations and pilots	<ul style="list-style-type: none"> ▪ Per BVES's response to DR003 	N/A
8.1.2.7 - GD_10 - Bear Valley Solar Energy Project	<ul style="list-style-type: none"> ▪ Per BVES's response to DR003 	N/A
8.1.2.7 - GD_11 - Energy Storage Project	<ul style="list-style-type: none"> ▪ Per BVES's response to DR003 	N/A
8.1.2.8 - GD_12 - Substation Automation	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_12 Substation Automation QAQC Procedures R0.pdf 	Activity Validated
8.1.2.8 - GD_13 - Switch and Field Device Automation	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_13 Switch and Field Device Automation QAQC Procedures R0.pdf 	Activity Validated
8.1.2.8 - GD_14 - Capacitor Bank Upgrade Project	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_14 Capacitor Bank Upgrade Project QAQC Procedures R0.pdf 	Activity Validated
8.1.2.8 - GD_15 - Fuse TripSaver Automation	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_15 Fuse TripSaver Automation QAQC Procedures R0.pdf 	Activity Validated
8.1.2.8 - GD_16 - Server Room	<ul style="list-style-type: none"> ▪ Per BVES's response to DR003 	N/A
8.1.2.9 - GD_18 - Line removals (in HFTD)	<ul style="list-style-type: none"> ▪ Per BVES's response to DR003 	N/A

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8.1.2.10 - GD_19 - Tree Attachment Removal Project	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR007 in attachment GD_19 Tree Attachment Removal Project QAQC Procedures R0.pdf 	Activity Validated
8.1.2.11 - GD_20 - Other grid topology improvements to mitigate or reduce PSPS events	<ul style="list-style-type: none"> ▪ Per BVES's response to DR003 	N/A
8.1.2.12 - GD_21 - BVPP Phase 4 Upgrade Project	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_21 QAQC BVPP Phase 4 Upgrade Project R0.pdf 	Activity Validated
8.1.2.12 - GD_23 - Safety and Technical Upgrades to Lake Substation	<ul style="list-style-type: none"> ▪ Per BVES's response to DR003 	N/A
8.1.2.12 - GD_24 - Partial Safety and Technical Upgrades to Village Substation	<ul style="list-style-type: none"> ▪ Per BVES's response to DR003 	N/A
8.1.3.1 - GD_25 - Detailed Inspections	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_25 QAQC Detailed Inspections R0.pdf 	Activity Validated
8.1.3.1 - GD_26 - Patrol Inspections	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_26 QAQC Patrol Inspections R0.pdf 	Activity Validated
8.1.3.1 - GD_27 - UAV Thermography	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_27 UAV Thermography QAQC Procedures R0.pdf 	Activity Validated
8.1.3.1 - GD_28 - UAV HD Photography/Videography	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_28 UAV Photography and Videography QAQC Procedures R0.pdf 	Activity Validated
8.1.3.1 - GD_29 - LiDAR Inspection	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_29 LiDAR Inspections QAQC Procedures R0.pdf 	Activity Validated

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8.1.3.1 - GD_30 - 3rd Party Ground Patrol	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_30 3rd Party Ground Patrol Inspections QAQC Procedures R0.pdf 	Activity Validated
8.1.3.1 - GD_31 - Intrusive Pole Inspections	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_31 Intrusive Pole Inspections QAQC Procedures R0.pdf 	Activity Validated
8.1.3.1 - GD_32 - Substation inspections	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_32 QAQC Substation Inspections R0.pdf 	Activity Validated
8.1.4 - GD_33 - Equipment maintenance and repair	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_33 Equipment maintenance and repair QAQC Procedures R0.pdf 	Activity Validated
8.1.5 - GD_34 - Asset management and inspection enterprise system(s)	<ul style="list-style-type: none"> ▪ Per BVES's response to DR003 	N/A
8.1.6 - GD_35 - Asset Quality assurance/ quality control	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR028 in attachment GD_35 QAQC Management and Inspection Enterprise System Procedures R0.pdf 	Activity Validated
8.1.7 - GD_36 - Asset Open work orders	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_36 Asset Open Work Orders QAQC Procedures R0.pdf 	Activity Validated
8.1.8.1 - GD_37 - Equipment Settings to Reduce Wildfire Risk	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_37 QAQC Equipment Settings to reduce Wildfire Risk R0.pdf 	Activity Validated
8.1.8.2 - GD_38 - Grid Response Procedures and Notifications	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment GD_38 QAQC Grid Procedures and Notifications R0.pdf 	Activity Validated

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8.1.8.3 - GD_39 - Personnel Work Procedures and Training in Conditions of Elevated Fire Risk	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR053 in attachment GD_39 QAQC Personnel Work Procedures and Training in Conditions of Elevated Fire Risk Procedures R0.pdf 	Activity Validated
8.1.9 - GD_40 - Asset Workforce Planning	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR054 in attachment GD_40 QAQC Asset Workforce Planning Procedures R0.pdf 	Activity Validated
8.2.2.1 - VM_1 - Detailed Inspections	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR_017 in attachment VM_1 Detailed Inspections QAQC Procedures R0.pdf 	Activity Validated
8.2.2.1 - VM_2 - Patrol Inspections	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR_018 in attachment VM_2 Patrol Inspections QAQC Procedures R0.pdf 	Activity Validated
8.2.2.1 - VM_3 - UAV HD Photography/Videography	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR019 in attachment VM_3 UAV Photography and Videography QAQC Procedures R0.pdf 	Activity Validated
8.2.2.1 - VM_4 - LiDAR Inspection	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR020 in attachment VM_4 LiDAR Inspections QAQC Procedures R0.pdf 	Activity Validated
8.2.2.1 - VM_5 - 3rd Party Ground Patrol	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR021 in attachment VM_5 3rd Party Ground Patrol R0.pdf 	Activity Validated
8.2.2.1 - VM_6 - Substation inspections	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR022 in attachment VM_6 QAQC Substation Inspections R0.pdf 	Activity Validated
8.2.3.1 - VM_7 - Pole clearing	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR055 in attachment VM_7 Pole Clearing QAQC Procedures R0.pdf 	Activity Validated
8.2.3.2 - VM_8 - Wood and slash management	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR056 in attachment VM_8 Wood and slash management QAQC Procedures R0 pdf 	Activity Validated

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8.2.3.3 - VM_9 - Clearance	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR008 in attachment VM_9 Clearance QAQC Procedures R0.pdf 	Activity Validated
8.2.3.4 - VM_10 - Fall-in mitigation	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR029 in attachment VM_10 Fall-in Mitigation QAQC Procedures R0.pdf 	Activity Validated
8.2.3.5 - VM_11 - Substation defensible space	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR_030 in attachment VM_11 Substation Defensible Space R0.pdf 	Activity Validated
8.2.3.6 - VM_12 - High-risk species	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR057 in attachment VM_12 High-Risk Species QAQC Procedures R0.pdf 	Activity Validated
8.2.3.7 - VM_13 - Fire-resilient rights-of-way	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR078 in attachment VM_13 Fire-Resilience Right-of-Ways QAQC Procedures R0 	Activity Validated
8.2.3.8 - VM_14 - Emergency response vegetation management	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR058 in attachment VM_14 Emergency Response Vegetation Management QAQC Procedures R0.pdf 	Activity Validated
8.2.4 - VM_15 - Vegetation management enterprise system	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR059 in attachment VM_15 Vegetation Management Enterprise System QAQC Procedures R0.pdf 	Activity Validated
8.2.5 - VM_16 - Vegetation Management Quality assurance / quality control	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR031 in attachment BVES INC Vegetation Management and Vegetation Management QC Programs Policy and Procedures Rev1.pdf ▪ Documented in BVES's Response to DR031 in attachment VM_16 QAQC Vegetation Management Procedures R0.pdf 	Activity Validated
8.2.6 - VM_17 - Vegetation Management Open work orders	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR060 in attachment VM_17 	Activity Validated

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	Vegetation Management Open Work QAQC Procedures R0.pdf	
8.2.7 - VM_18 - Vegetation Management Workforce planning	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR061 in attachment VM_18 Vegetation Management Workforce Planning QAQC Procedures R0.pdf 	Activity Validated
8.3.2 - SAF_1 - Advanced weather monitoring and weather stations	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR062 in attachment SAF_1 QAQC Advanced Weather Monitoring and Weather Stations Procedures R0.pdf 	Activity Validated
8.3.3 - SAF_2 - Install Fault Indicators	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR032 in attachment SAF_2 Install Fault Indicators QAQC Procedures R0.pdf 	Activity Validated
8.3.3 - SAF_3 - Online Diagnostic System	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR033 in attachment SAF_3 Online Diagnostic System QAQC Procedures R0.pdf 	Activity Validated
8.3.4 - SAF_4 - HD ALERTWildfire Cameras	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR063 in attachment SAF_4 QAQC ALERTWildfire cameras R0.pdf 	Activity Validated
8.3.5 - SAF_5 - Weather forecasting	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR064 in attachment SAF_5 Weather Forecasting R0.pdf 	Activity Validated
8.3.6 - SAF_6 - Fire potential index	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR065 in attachment SAF_6 QAQC Fire Potential Index R0.pdf 	Activity Validated
8.4.2 - EP_1 - Emergency preparedness plan	<ul style="list-style-type: none"> ▪ Documented in BVES's Response to DR066 in attachment EP_1 QAQC Emergency Preparednes Plan Procedures R0.pdf 	Activity Validated
8.4.3 - EP_2 - External collaboration and coordination	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment EP_2 QAQC External Collaboration and Coordination Procedures R0.pdf 	Activity Validated
8.4.4 - EP_3 - Public emergency communication strategy	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment EP_3 QAQC Public 	Activity Validated

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	emergency communication strategy R0.pdf	
8.4.5 - EP_4 - Preparedness and planning for service restoration	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment EP_4 QAQC Preparedness and Planning for Service Restoration R0.pdf 	Activity Validated
8.4.6 - EP_5 - Customer support in wildfire and PSPS emergencies	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment EP_5 QAQC Customer Support on Wildfire and PSPS Emergencies R0.pdf 	Activity Validated
8.5.2 - COE_1 - Public outreach and education awareness program	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment COE_1 QAQC Public outreach and education awareness program R0.pdf 	Activity Validated
8.5.3 - COE_2 - Engagement with access and functional needs populations	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment COE_2 QAQC Engagement with Access and Functional Needs population R0.pdf 	Activity Validated
8.5.4 - COE_3 - Collaboration on local wildfire mitigation planning	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment COE_3 QAQC Collaboration on Local wildfire mitigation planning R0.pdf 	Activity Validated
8.5.5 - COE_4 - Best practice sharing with other utilities	<ul style="list-style-type: none"> ▪ Documented in Bear Valley's Confidential Response in DR003b in attachment COE_4 QAQC Best Practices sharing with other utilities R0.pdf 	Activity Validated

4. CONCLUSION

BVES's 2023 WMP builds on the previous year's wildfire statistical momentum by researching and implementing new practices, programs and technologies in an effort to improve initiative success across all categories. BVES has also participated in community outreach and education programs within the community it serves in order better understand the needs of their customers.

Throughout the 2024 Independent Evaluator process, BVES demonstrated a commitment to the WMP program by participating with professionalism and cooperation while working to provide the IE with the data necessary for a successful evaluation process. Based on the overall evaluation of the Independent Evaluator process with in-depth reviews of BEVS's 2023 WMP list of initiatives, we have determined that Bear Valley Electric has met their 2023 WMP goals of reducing the risk of wildfires in the communities it serves.



APPENDICES



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Appendix A – List of 2023 WMP Activities

SOW Category	2023 WMP Activities	WMP Category	2023 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design, Operations, and Maintenance	8.1.2.1	GD_1	Covered Conductor Replacement Project	Covered conductor installation
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design, Operations, and Maintenance	8.1.2.3	GD_4	Covered Conductor Replacement Project	Distribution pole replacements and reinforcements
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design, Operations, and Maintenance	8.1.2.3	GD_6	Evacuation Route Hardening Project	Distribution pole replacements and reinforcements
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design, Operations, and Maintenance	8.1.2.10	GD_19	Tree Attachment Removal Project	Other grid topology improvements to minimize risk of ignitions
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Vegetation Management and Inspection	8.2.3.3	VM_9	Clearance	Clearance
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, and Maintenance	8.1.3.1	GD_25	Detailed Inspections	Asset inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target –	Grid Design, Operations, and	8.1.3.1	GD_26	Patrol Inspections	Asset inspections

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	Not Field Verifiable	Maintenance				
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, and Maintenance	8.1.3.1	GD_27	UAV Thermography	Asset inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, and Maintenance	8.1.3.1	GD_28	UAV HD Photography/Videography	Asset inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, and Maintenance	8.1.3.1	GD_29	LiDAR Inspection	Asset inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, and Maintenance	8.1.3.1	GD_30	3rd Party Ground Patrol	Asset inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, and Maintenance	8.1.3.1	GD_31	Intrusive Pole Inspections	Asset inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, and Maintenance	8.1.3.1	GD_32	Substation inspections	Asset inspections
WMP Activity	b. Large Volume Quantifiable	Vegetation Management	8.2.2.1	VM_1	Detailed Inspections	Vegetation inspections

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Completion	Goal/Target – Not Field Verifiable	and Inspection				
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspection	8.2.2.1	VM_2	Patrol Inspections	Vegetation inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspection	8.2.2.1	VM_3	UAV HD Photography/Videography	Vegetation inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspection	8.2.2.1	VM_4	LiDAR Inspection	Vegetation inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspection	8.2.2.1	VM_5	3rd Party Ground Patrol	Vegetation inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspection	8.2.2.1	VM_6	Substation inspections	Vegetation inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Community Outreach and Engagement	8.5.2	COE_1	Public outreach and education awareness program	Public outreach and education awareness program
WMP	c. Small (less	Grid Design,	8.1.2.8	GD_12	Substation Automation	Installation of system

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Activity Completion	than 100 items) Volume Quantifiable Goal/Target	Operations, and Maintenance				automation equipment
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.8	GD_13	Switch and Field Device Automation	Installation of system automation equipment
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.8	GD_14	Capacitor Bank Upgrade Project	Installation of system automation equipment
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.8	GD_15	Fuse TripSaver Automation	Installation of system automation equipment
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, and Maintenance	8.1.6	GD_35	Asset Quality assurance/ quality control	Quality assurance / quality control
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Vegetation Management and Inspection	8.2.3.4	VM_10	Fall-in mitigation	Fall-in mitigation
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Vegetation Management and Inspection	8.2.3.5	VM_11	Substation defensible space	Substation defensible space

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WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Vegetation Management and Inspection	8.2.5	VM_16	Vegetation Management Quality assurance / quality control	Quality assurance / quality control
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Situational Awareness and Forecasting	8.3.3	SAF_2	Install Fault Indicators	Grid monitoring systems
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Situational Awareness and Forecasting	8.3.3	SAF_3	Online Diagnostic System	Grid monitoring systems
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Community Outreach and Engagement	8.5.3	COE_2	Engagement with access and functional needs populations	Engagement with access and functional needs populations
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Community Outreach and Engagement	8.5.5	COE_4	Best practice sharing with other utilities	Best practice sharing with other utilities
WMP Activity Completion	d. Qualitative Goal/Target	Overview of the Service Territory	5.4.5	ST_1	Environmental compliance and permitting	Environmental compliance and permitting
WMP Activity Completion	d. Qualitative Goal/Target	Risk Methodology and Assessment	6	RMA_1	Technosylva Contractor. Program implemented and ongoing.	Risk Methodology and Assessment
WMP Activity	d. Qualitative Goal/Target	Wildfire Mitigation	7	WMSD_1	Wildfire Mitigation Strategy Development	Wildfire Mitigation Strategy Development

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Completion		Strategy Development				
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.1	GD_2	Radford Line Replacement Project	Covered conductor installation
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.2	GD_3	Minor Undergrounding Upgrades Projects	Undergrounding of electric lines and/or equipment
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.3	GD_5	Radford Line Replacement Project	Distribution pole replacements and reinforcements
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.4	GD_7	NA	Transmission pole/tower replacements and reinforcements
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.5	GD_8	Traditional overhead hardening	Traditional overhead hardening
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.6	GD_9	Emerging grid hardening technology installations and pilots	Emerging grid hardening technology installations and pilots
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.7	GD_10	Bear Valley Solar Energy Project	Microgrids
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.7	GD_11	Energy Storage Project	Microgrids

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WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.8	GD_16	Server Room	Installation of system automation equipment
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.9	GD_18	Line removals (in HFTD)	Line removals (in HFTD)
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.11	GD_20	Other grid topology improvements to mitigate or reduce PSPS events	Other grid topology improvements to mitigate or reduce PSPS events
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.12	GD_21	BVPP Phase 4 Upgrade Project	Other technologies and systems not listed above
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.12	GD_23	Safety and Technical Upgrades to Lake Substation	Other technologies and systems not listed above
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.2.12	GD_24	Partial Safety and Technical Upgrades to Village Substation	Other technologies and systems not listed above
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.4	GD_33	Equipment maintenance and repair	Equipment maintenance and repair
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.5	GD_34	Asset management and inspection enterprise system(s)	Asset management and inspection enterprise system(s)
WMP Activity	d. Qualitative Goal/Target	Grid Design, Operations,	8.1.7	GD_36	Asset Open work orders	Open work orders

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Completion		and Maintenance				
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.8.1	GD_37	Equipment Settings to Reduce Wildfire Risk	Equipment Settings to Reduce Wildfire Risk
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.8.2	GD_38	Grid Response Procedures and Notifications	Grid Response Procedures and Notifications
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.8.3	GD_39	Personnel Work Procedures and Training in Conditions of Elevated Fire Risk	Personnel Work Procedures and Training in Conditions of Elevated Fire Risk
WMP Activity Completion	d. Qualitative Goal/Target	Grid Design, Operations, and Maintenance	8.1.9	GD_40	Asset Workforce Planning	Workforce Planning
WMP Activity Completion	d. Qualitative Goal/Target	Vegetation Management and Inspection	8.2.3.1	VM_7	Pole clearing	Pole clearing
WMP Activity Completion	d. Qualitative Goal/Target	Vegetation Management and Inspection	8.2.3.2	VM_8	Wood and slash management	Wood and slash management
WMP Activity Completion	d. Qualitative Goal/Target	Vegetation Management and Inspection	8.2.3.6	VM_12	High-risk species	High-risk species
WMP Activity Completion	d. Qualitative Goal/Target	Vegetation Management and Inspection	8.2.3.7	VM_13	Fire-resilient rights-of-way	Fire-resilient rights-of-way
WMP Activity Completion	d. Qualitative Goal/Target	Vegetation Management and Inspection	8.2.3.8	VM_14	Emergency response vegetation management	Emergency response vegetation management

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WMP Activity Completion	d. Qualitative Goal/Target	Vegetation Management and Inspection	8.2.4	VM_15	Vegetation management enterprise system	Vegetation management enterprise system
WMP Activity Completion	d. Qualitative Goal/Target	Vegetation Management and Inspection	8.2.6	VM_17	Vegetation Management Open work orders	Open work orders
WMP Activity Completion	d. Qualitative Goal/Target	Vegetation Management and Inspection	8.2.7	VM_18	Vegetation Management Workforce planning	Workforce planning
WMP Activity Completion	d. Qualitative Goal/Target	Situational Awareness and Forecasting	8.3.2	SAF_1	Advanced weather monitoring and weather stations	Environmental monitoring systems
WMP Activity Completion	d. Qualitative Goal/Target	Situational Awareness and Forecasting	8.3.4	SAF_4	HD ALERTWildfire Cameras	Ignition detection systems
WMP Activity Completion	d. Qualitative Goal/Target	Situational Awareness and Forecasting	8.3.5	SAF_5	Weather forecasting	Weather forecasting
WMP Activity Completion	d. Qualitative Goal/Target	Situational Awareness and Forecasting	8.3.6	SAF_6	Fire potential index	Fire potential index
WMP Activity Completion	d. Qualitative Goal/Target	Emergency Preparedness	8.4.2	EP_1	Emergency preparedness plan	Emergency preparedness plan
WMP Activity Completion	d. Qualitative Goal/Target	Emergency Preparedness	8.4.3	EP_2	External collaboration and coordination	External collaboration and coordination
WMP Activity	d. Qualitative Goal/Target	Emergency Preparedness	8.4.4	EP_3	Public emergency communication strategy	Public emergency communication strategy

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Completion						
WMP Activity Completion	d. Qualitative Goal/Target	Emergency Preparedness	8.4.5	EP_4	Preparedness and planning for service restoration	Preparedness and planning for service restoration
WMP Activity Completion	d. Qualitative Goal/Target	Emergency Preparedness	8.4.6	EP_5	Customer support in wildfire and PSPS emergencies	Customer support in wildfire and PSPS emergencies
WMP Activity Completion	d. Qualitative Goal/Target	Community Outreach and Engagement	8.5.4	COE_3	Collaboration on local wildfire mitigation planning	Collaboration on local wildfire mitigation planning

Appendix B – List of Documents Reviewed

Item No.	Documents Reviewed - Public	Document Date
1	Bear Valley Electric Service, Inc. 2023 Electrical Corporation Annual Report on Compliance Pursuant to Public Utilities Code Section 8386.3(c)(1), https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56434&shareable=true , Access Date 5/26/24	4/2/2024
2	California Power Line Fire Prevention Field Guide 2021 Edition, https://cdnverify.osfm.fire.ca.gov/media/3vqj2sft/2021-power-line-fire-prevention-field-guide-ada-final_jf_20210125.pdf , Access Date 5/6/24	1/25/2021
3	Wildfire Mitigation Data Tables Template: Tables 1-15 (2023 Q4 QDR) File name: bves_2024_q1_tables1-15_r0.xlsx	2/1/2024

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Appendix C – Data Log, Data and Interview Requests

BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_001	4/12/2024	BV		4/17/2024		BVES_DR001	2023-05-08_BVES_2023_WMP_Appendices 2023-08-23_BVES_2023_WMP_R1
DR_002	4/12/2024	BV		4/22/2024		BVES_DR002	2023 BVES WMP Initiatives BVES_2023_Q4_Tables1-15_R0 Copy of 2023 WMP Initiatives spreadsheet updated 4-22-24 (1st list wasn't categorized)
DR_003	4/12/2024	BV		4/17/2024		BVES_DR003	BVES QAQC Programs - 2023
DR_003.b	6/10/2024	BV		6/10/2024		BVES_DR003.b	COE_1 QAQC Public outreach and education awareness program R0 COE_2 QAQC Engagement with Access and Functional Needs population R0 COE_3 QAQC Collaboration on Local wildfire mitigation planning R0 COE_4 QAQC Best Practices sharing with other utilities R0 EP_2 QAQC External Collaboration and Coordination Procedures R0 EP_3 QAQC Public emergency communication strategy R0 EP_4 QAQC Preparedness and Planning for Service Restoration R0 EP_5 QAQC Customer Support on Wildfire and PSPS Emergencies R0 GD_1 Covered Conductor Replacement Project QAQC Procedures R0 GD_12 Substation Automation QAQC Procedures R0 GD_13 Switch and Field Device Automation QAQC Procedures R0 GD_14 Capacitor Bank Upgrade Project QAQC Procedures R0

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
							GD_15 Fuse TripSaver Automation QAQC Procedures R0 GD_21 QAQC BVPP Phase 4 Upgrade Project R0 GD_25 QAQC Detailed Inspections R0 GD_26 QAQC Patrol Inspections R0 GD_27 UAV Thermography QAQC Procedures R0 GD_28 UAV Photography and Videography QAQC Procedures R0 GD_29 LiDAR Inspections QAQC Procedures R0 GD_30 3rd Party Ground Patrol Inspections QAQC Procedures R0 GD_31 Intrusive Pole Inspections QAQC Procedures R0 GD_32 QAQC Substation Inspections R0 GD_33 Equipment maintenance and repair QAQC Procedures R0 GD_36 Asset Open Work Orders QAQC Procedures R0 GD_37 QAQC Equipment Settings to reduce Wildfire Risk R0 GD_38 QAQC Grid Procedures and Notifications R0 RMA_1 QAQC Technosylva Contractor. Program implemented and ongoing R0 ST_1 QAQC Environmental Compliance and Permitting R0
DR_004	4/29/2024	C2	8.1.2.1 - GD_1 - Covered Conductor Replacement Project	5/2/2024	8.1.2.1 - GD_1	BVES_DR004	Covered Conductor Replacement GD_1 Covered Conductor Replacement Project QAQC Procedures R0
DR_005	4/29/2024	C2	8.1.2.3 - GD_4 - Distribution Pole Replacements and Reinforcements	5/3/2024	8.1.2.3 - GD_4	BVES_DR005	GD_4 Covered Conductor Replacement Project QAQC Procedures Rev 0 (003) Replaced Poles
DR_006	4/29/2024	C2	8.1.2.3 - GD_6 - Evacuation Route Hardening Project	5/2/2024	8.1.2.3 - GD_6	BVES_DR006	Evacuation Route Hardening GD_6 Evacuation Route Hardening Project QAQC Procedures R0

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_007	4/29/2024	C2	8.1.2.10 - GD_19 - Tree Attachment Removal Project	5/2/2024	8.1.2.10 - GD_19	BVES_DR007	GD_19 Tree Attachment Removal Project QAQC Procedures R0 Tree Attachment Removals
DR_008	4/29/2024	C2	8.2.3.3 - VM_9 - Clearance	5/2/2024	8.2.3.3 - VM_9	BVES_DR008	VegManag.gdb All 2023 CM Veg VegManagCM.gdb (ZIP File) VM_9 Clearance QAQC Procedures R0
DR_009	5/9/2024	BV	8.1.3.1 - GD_25 - Detailed Inspections	5/14/2024	8.1.3.1 - GD_25	BVES_DR009	Detail Inspections Detailed Inspection DR009 - BVES Response
DR_009B	5/16/2024	BV	8.1.3.1 - GD_25 - Detailed Inspections	5/21/2024	8.1.3.1 - GD_25	BVES_DR009B	2023 Inspection Findings and Supporting Notes Detailed Inspection Mileage
DR_010	5/13/2024	BV	8.1.3.1 - GD_26 - Patrol Inspections	5/16/2024	8.1.3.1 - GD_26	BVES_DR010	Patrol Inspections 2023 Inspection Findings DR010 - BVES Response
DR_011	5/13/2024	BV	8.1.3.1 - GD_27 - UAV Thermography	5/16/2024	8.1.3.1 - GD_27	BVES_DR011	DR011 - BVES Response UAV Findings
DR_011.b	5/20/2024	BV	8.1.3.1 - GD_27 - UAV Thermography	5/23/2024	8.1.3.1 - GD_27	BVES_DR011.b	DR011.b - attach - circuit miles DR011.b - BVES Response
DR_012	5/13/2024	BV	8.1.3.1 - GD_28 - UAV HD Photography/Videography	5/16/2024	8.1.3.1 - GD_28	BVES_DR012	DR012 - BVES Response UAV Findings
DR_013	5/13/2024	BV	8.1.3.1 - GD_29 - LiDAR Inspection	5/16/2024	8.1.3.1 - GD_29	BVES_DR013	DR013 - BVES Response MobileLiDARDeliverables (ZIP File)
DR_014	5/13/2024	BV	8.1.3.1 - GD_30 - 3rd Party Ground Patrol	5/16/2024	8.1.3.1 - GD_30	BVES_DR014	2023 3rd Party Ground Patrol Findings

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_014.b	5/20/2024	BV	8.1.3.1 - GD_30 - 3rd Party Ground Patrol	5/23/2024	8.1.3.1 - GD_30	BVES_DR014.b	DR014.b - attach - circuit miles DR014.b - BVES Response Selected Inspection Reports
DR_015	5/13/2024	BV	8.1.3.1 - GD_31 - Intrusive Pole Inspections	5/16/2024	8.1.3.1 - GD_31	BVES_DR015	Intrusive Pole Inspections 2023
DR_016	5/13/2024	BV	8.1.3.1 - GD_32 - Substation inspections	5/16/2024	8.1.3.1 - GD_32	BVES_DR016	Bear City Substation Bear Mountain Substation Division Substation Fawnskin Substation Lake Substation Maltby Substation Maple Substation Meadow Substation Moonridge Substation Palomino Substation Pineknott Substation Summit Substation Village Substation
DR_017	5/6/2024	C2	8.2.2.1 - VM_1 - Detailed Inspections	5/9/2024	8.2.2.1 - VM_1	BVES_DR017	Detail Inspections DR017 - BVES Response VM_1 Detailed Inspections QAQC Procedures R0
DR_018	5/6/2024	C2	8.2.2.1 - VM_2 - Patrol Inspections	5/9/2024	8.2.2.1 - VM_2	BVES_DR018	Patrol Inspections DR018 - BVES Response Mileage Difference WMP vs QDR VM_2 Patrol Inspections QAQC Procedures R0
DR_019	5/6/2024	C2	8.2.2.1 - VM_3 - UAV HD Photography/Videography	5/9/2024	8.2.2.1 - VM_3	BVES_DR019	DR019 - BVES Response Mileage Difference WMP vs QDR VM_3 UAV Photography and Videography QAQC Procedures R0

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_019.1	5/28/2024	C2	8.2.2.1 - VM_3 - UAV HD Photography/Videography	5/29/2024	8.2.2.1 - VM_3	BVES_DR019.1	DR019.1 - BVES Response
DR_020	5/6/2024	C2	8.2.2.1 - VM_4 - LiDAR Inspection	5/9/2024	8.2.2.1 - VM_4	BVES_DR020	DR020 - BVES Response Mileage Difference WMP vs QDR VM_4 LiDAR Inspections QAQC Procedures R0
DR_020.1	5/28/2024	C2	8.2.2.1 - VM_4 - LiDAR Inspection	5/29/2024	8.2.2.1 - VM_4	BVES_DR020.1	DR020.1 - BVES Response
DR_021	5/6/2024	C2	8.2.2.1 - VM_5 - 3rd Party Ground Patrol	5/9/2024	8.2.2.1 - VM_5	BVES_DR021	2023 3rd Party Ground Patrol Mileage Difference WMP vs QDR VM_5 3rd Party Ground Patrol R0
DR_021.1	6/10/2024	C2	8.2.2.1 - VM_5 - 3rd Party Ground Patrol	6/10/2024	8.2.2.1 - VM_5	BVES_DR021.1	3rd Party Ground Patrol Inspection Report Sample
DR_022	5/6/2024	C2	8.2.2.1 - VM_6 - Substation inspections	5/9/2024	8.2.2.1 - VM_6	BVES_DR022	Substation Inspections VM_6 QAQC Substation Inspections R0
DR_023	5/31/2024	BV	8.5.2 - COE_1 - Public outreach and education awareness program	6/5/2024	8.5.2 - COE_1	BVES_DR023	Community Outreach
DR_024	5/13/2024	BV	8.1.2.8 - GD_12 - Substation Automation	5/16/2024	8.1.2.8 - GD_12	BVES_DR024	Bear City SCADA Connection DR024 - BVES Response Meadow SCADA Connection Substation Automation Village SCADA Connection
DR_025	5/13/2024	BV	8.1.2.8 - GD_13 - Switch and Field Device Automation	5/16/2024	8.1.2.8 - GD_13	BVES_DR025	FLISR
DR_026	5/9/2024	BV	8.1.2.8 - GD_14 - Capacitor Bank Upgrade Project	5/14/2024	8.1.2.8 - GD_14	BVES_DR026	Capacitor Banks Connected to SCADA

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_026.b	5/22/2024	BV	8.1.2.8 - GD_14 - Capacitor Bank Upgrade Project	5/29/2024	8.1.2.8 - GD_15	BVES_DR026.b	C7027BV C9665BV Capacitor Banks Connected to SCADA DR026.b - BVES Response
DR_027	5/9/2024	BV	8.1.2.8 - GD_15 - Fuse TripSaver Automation	5/14/2024	8.1.2.8 - GD_15	BVES_DR027	Trip Savers Connected to SCADA
DR_027.b	5/22/2024	BV	8.1.2.8 - GD_15 - Fuse TripSaver Automation	5/29/2024	8.1.2.8 - GD_15	BVES_DR027.b	DR027.b - BVES Response Trip Savers Connected to SCADA TS435 TS624 TS901
DR_028	5/6/2024	C2	8.1.6 - GD_35 - Asset Quality assurance/ quality control	5/9/2024	8.1.6 - GD_35	BVES_DR028	GD_35 QAQC Management and Inspection Enterprise System Procedures R0 QC Work orders for 2023
DR_028.1	5/22/2024	C2	8.1.6 - GD_35 - Asset Quality assurance/ quality control	5/29/2024	8.1.6 - GD_35	BVES_DR028.1	433 Barrett Way-As Built 433 Barrett Way-material sheet 2 of 2 433 Barrett Way-material sheet 1 of 2 524 Kern-As Built 524 Kern-material sheet 1 of 2 524 Kern-material sheet 2 of 2 42090 Northshore-as built 42090 Northshore-material sheet 1 of 2 42090 Northshore-material sheet 2 of 2 44398 Barton-As Built 44398 Barton-material sheet 1 of 2 44398 Barton-material sheet 2 of 2 Piney Ridge & Bruin PI-As built Piney Ridge Pl. & Bruin Tr. material sheet 1 of 1

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_029	5/6/2024	C2	8.2.3.4 - VM_10 - Fall-in mitigation	5/9/2024	8.2.3.4 - VM_10	BVES_DR029	2023 Tree Removals VM_10 Fall-in Mitigation QAQC Procedures R0
DR_029.1	5/22/2024	C2	8.2.3.4 - VM_10 - Fall-in mitigation	5/28/2024	8.2.3.4 - VM_10	BVES_DR029.1	DR029.1 - BVES Response
DR_030	5/6/2024	C2	8.2.3.5 - VM_11 - Substation defensible space	5/9/2024	8.2.3.5 - VM_11	BVES_DR030	Substation Defensible Space VM_11 Substation Defensible Space R0
DR_030.1	5/22/2024	C2	8.2.3.5 - VM_11 - Substation defensible space	5/28/2024	8.2.3.5 - VM_11	BVES_DR030.1	Bear City Substation Division Substation Maltby Substation Maple Substation Summit Substation
DR_031	5/6/2024	C2	8.2.5 - VM_16 - Vegetation Management Quality assurance / quality control	5/9/2024	8.2.5 - VM_16	BVES_DR031	BVES INC Vegetation Management and Vegetation Management QC Programs Policy and Procedures Rev1 DR031 - BVES Response DR-312023 Vegetation Management Audits. Updates VM_16 QAQC Vegetation Management Procedures R0
DR_032	5/6/2024	C2	8.3.3 - SAF_2 - Install Fault Indicators	5/9/2024	8.3.3 - SAF_2	BVES_DR032	Fault Indicators SAF_2 Install Fault Indicators QAQC Procedures R0
DR_032.1	5/22/2024	C2	8.3.3 - SAF_2 - Install Fault Indicators	5/29/2024	8.3.3 - SAF_2	BVES_DR032.1	10704BV FI 31472CIT FI DR032.1 - BVES Response
DR_033	5/6/2024	C2	8.3.3 - SAF_3 - Online Diagnostic System	5/9/2024	8.3.3 - SAF_3	BVES_DR033	DR033 - BVES Response Online Diagnostic System SAF_3 Online Diagnostic System QAQC Procedures R0
DR_033.1	5/22/2024	C2	8.3.3 - SAF_3 - Online Diagnostic System	5/28/2024	8.3.3 - SAF_4	BVES_DR033.1	Grid Monitoring System Installation

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_034	5/31/2024	BV	8.5.3 - COE_2 - Engagement with access and functional needs populations	6/5/2024	8.5.3 - COE_2	BVES_DR034	AFN Engagement
DR_035	5/31/2024	BV	8.5.5 - COE_4 - Best practice sharing with other utilities	6/5/2024	8.5.5 - COE_4	BVES_DR035	Working Groups and Conferences
DR_036	5/13/2024	BV	5.4.5 - ST_1 - Environmental compliance and permitting	5/16/2024	5.4.5 - ST_1	BVES_DR036	1 - BVES Main Facility HMBP Annual Certification_02-22-23
DR_037	5/30/2024	BV	6 - RMA_1 - Technosylva Contractor. Program implemented and ongoing.	6/4/2024	6 - RMA_1	BVES_DR037	2023 vs 2022 FireSight Training C#3234-000 REV FULLY EXECUTED_1
DR_038	5/29/2024	BV	7 - WMSD_1 - Wildfire Mitigation Strategy Development	6/4/2024	7 - WMSD_ 1	BVES_DR038	DR038 - BVES Response
DR_039	5/21/2024	C2	8.1.2.2 - GD_3 - Minor Undergrounding Upgrades Projects	5/24/2024	8.1.2.2 - GD_3	BVES_DR039	GD_3 Minor Undergrounding Upgrades Projects QAQC Procedures R0
DR_040	Not used	C2	8.1.2.4 - GD_7 - NA	NA	8.1.2.4 - GD_7	BVES_DR040	NA
DR_041	5/21/2024	C2	8.1.2.5 - GD_8 - Traditional overhead hardening	5/24/2024	8.1.2.5 - GD_8	BVES_DR041	GD_3 Minor Undergrounding Upgrades Projects QAQC Procedures R0 Traditional Overhead Hardening

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_042	5/13/2024	BV	8.1.2.7 - GD_10 - Bear Valley Solar Energy Project	5/16/2024	8.1.2.7 - GD_10	BVES_DR042	BVES Solar and Storage Project 051524 DR042 - BVES Response
DR_043	5/13/2024	BV	8.1.2.7 - GD_11 - Energy Storage Project	5/16/2024	8.1.2.7 - GD_11	BVES_DR043	BESS Objective BESS PSPS Impact BVES Battery Storage and Solar Energy Planning and Development Press Release
DR_044	5/9/2024	BV	8.1.2.8 - GD_16 - Server Room	5/14/2024	8.1.2.8 - GD_16	BVES_DR044	BVES server room information Server Room Equipment
DR_045	5/9/2024	BV	8.1.2.9 - GD_18 - Line removals (in HFTD)	5/14/2024	8.1.2.9 - GD_18	BVES_DR045	DR045 - BVES Response
DR_046	5/30/2024	BV	8.1.2.11 - GD_20 - Other grid topology improvements to mitigate or reduce PSPS events	6/4/2024	8.1.2.11 - GD_20	BVES_DR046	DR046 - BVES Response
DR_047	5/20/2024	BV	8.1.2.12 - GD_21 - BVPP Phase 4 Upgrade Project	5/23/2024	8.1.2.12 - GD_21	BVES_DR047	C#20288-007 - OS - FULLY EXECUTED DR047 - BVES Response SDP invoice for phase 3
DR_048	5/20/2024	BV	8.1.2.12 - GD_23 - Safety and Technical Upgrades to Lake Substation	5/23/2024	8.1.2.12 - GD_23	BVES_DR048	DR048 - BVES Response
DR_049	5/13/2024	BV	8.1.4 - GD_33 - Equipment maintenance and repair	5/16/2024	8.1.4 - GD_33	BVES_DR049	2023 GD-33 O&M Spending
DR_050	5/13/2024	BV	8.1.7 - GD_36 - Asset Open work orders	5/16/2024	8.1.7 - GD_36	BVES_DR050	GD_36 Asset Open Work Orders QAQC Procedures R0

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_051	5/13/2024	BV	8.1.8.1 - GD_37 - Equipment Settings to Reduce Wildfire Risk	5/16/2024	8.1.8.1 - GD_37	BVES_DR051	BVES INC 2023 PSPS Procedures Final 032223 DR051 - BVES Response
DR_052	5/13/2024	BV	8.1.8.2 - GD_38 - Grid Response Procedures and Notifications	5/16/2024	8.1.8.2 - GD_38	BVES_DR052	BVERS INC Emergency And Disaster Response Plan Rev2 Firefighting Coordination Protocols
DR_053	5/21/2024	C2	8.1.8.3 - GD_39 - Personnel Work Procedures and Training in Conditions of Elevated Fire Risk	5/24/2024	8.1.8.3 - GD_39	BVES_DR053	ATTACHMENT1_PSPS_Meetings_CY2023_030524 BVES PUBLIC SAFETY POWER SHUTOFF 2023 POST-SEASON REPORT bves-inc-2023-psps-procedures-final-022623-signed GD_39 QAQC Personnel Work Procedures and Training in Conditions of Elevated Fire Risk Procedures R0
DR_054	5/21/2024	C2	8.1.9 - GD_40 - Asset Workforce Planning	5/24/2024	8.1.9 - GD_40	BVES_DR054	C#2967-000 For Outsource Signed C#2967-004 FULLY EXECUTED C#2967-006 FULLY EXECUTED C#2967-007 FULLY EXECUTED C#2967-008-Amendment #1 - FULLY EXECUTED C#2968-000 For Outsource Signed C#2968-014 - FULLY EXECUTED C#2968-016 - Amendment #1 - FULLY EXECUTED GD_40 QAQC Asset Workforce Planning Procedures R0
DR_055	5/21/2024	C2	8.2.3.1 - VM_7 - Pole clearing	5/24/2024	8.2.3.1 - VM_7	BVES_DR055	BVES INC Vegetation Management and Vegetation Management QC Programs Policy and Procedures Rev1 BVES Vegetation Management Review and Training DR055 - BVES Response VM_7 Pole Clearing QAQC Procedures R0
DR_056	5/21/2024	C2	8.2.3.2 - VM_8 - Wood and slash management	5/24/2024	8.2.3.2 - VM_8	BVES_DR056	DR056 - BVES Response Vegetation Management Contract VM_8 Wood and slash management QAQC Procedures R0

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_057	5/21/2024	C2	8.2.3.6 - VM_12 - High-risk species	5/24/2024	8.2.3.6 - VM_12	BVES_DR057	BVES INC Vegetation Management and Vegetation Management QC Programs Policy and Procedures Rev1 DR057 - BVES Response VM_12 High-Risk Species QAQC Procedures R0
DR_058	5/21/2024	C2	8.2.3.8 - VM_14 - Emergency response vegetation management	5/24/2024	8.2.3.8 - VM_14	BVES_DR058	BVES Vegetation Management Review and Training DR058 - BVES Response Vegetation Management Contract VM_14 Emergency Response Vegetation Management QAQC Procedures R0
DR_059	5/21/2024	C2	8.2.4 - VM_15 - Vegetation management enterprise system	5/24/2024	8.2.4 - VM_15	BVES_DR059	BVES Vegetation Management Review and Training DR059 - BVES Response Vegetation Management Contract VM_15 Vegetation Management Enterprise System QAQC Procedures R0
DR_060	5/21/2024	C2	8.2.6 - VM_17 - Vegetation Management Open work orders	5/24/2024	8.2.6 - VM_17	BVES_DR060	DR060 - BVES Response VM_17 Vegetation Management Open Work QAQC Procedures R0
DR_061	5/21/2024	C2	8.2.7 - VM_18 - Vegetation Management Workforce planning	5/24/2024	8.2.7 - VM_18	BVES_DR061	BVES Vegetation Crew Log C#3095-000 For Signature-Fully Executed C#3095-003 - Amendment #1 - FULLY EXECUTED DR061 - BVES Response VM_18 Vegetation Management Workforce Planning QAQC Procedures R0
DR_062	5/21/2024	C2	8.3.2 - SAF_1 - Advanced weather monitoring and weather stations	5/24/2024	8.3.2 - SAF_1	BVES_DR062	BVES Weather Station Maintenance 2023 2024 SAF_1 QAQC Advanced Weather Monitoring and Weather Stations Procedures R0
DR_063	5/21/2024	C2	8.3.4 - SAF_4 - HD ALERTWildfire Cameras	5/24/2024	8.3.4 - SAF_4	BVES_DR063	DR063 - BVES Response SAF_4 QAQC ALERTWildfire cameras R0

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_064	5/21/2024	C2	8.3.5 - SAF_5 - Weather forecasting	5/24/2024	8.3.5 - SAF_5	BVES_DR064	DR064 - BVES Response SAF_5 Weather Forecasting R0
DR_065	5/21/2024	C2	8.3.6 - SAF_6 - Fire potential index	5/24/2024	8.3.6 - SAF_6	BVES_DR065	DR065 - BVES Response SAF_6 QAQC Fire Potential Index R0
DR_066	5/21/2024	C2	8.4.2 - EP_1 - Emergency preparedness plan	5/24/2024	8.4.2 - EP_1	BVES_DR066	bvers-inc-emergencyresponseanddisasterplan-rev2 bves-inc-2023-psps-procedures-final-022623-signed Emergency Response Plan Review and Evaluation EP_1 QAQC Emergency Preparedness Plan Procedures R0
DR_067	5/31/2024	BV	8.4.3 - EP_2 - External collaboration and coordination	6/5/2024	8.4.3 - EP_2	BVES_DR067	DR067 - BVES Response FINAL_Q3 2023 Joint IOU AFN Collaborative Council September 2023 WMP collaboration with outside agencies 2023
DR_068	5/31/2024	BV	8.4.4 - EP_3 - Public emergency communication strategy	6/5/2024	8.4.4 - EP_3	BVES_DR068	BVERS INC Emergency And Disaster Response Plan Rev2 DR068 - BVES Response
DR_069	5/31/2024	BV	8.4.5 - EP_4 - Preparedness and planning for service restoration	6/5/2024	8.4.5 - EP_4	BVES_DR069	DR069 - BVES Response WMP community brief 6.docx 6-29-2023 participant list
DR_070	5/31/2024	BV	8.4.6 - EP_5 - Customer support in wildfire and PSPS emergencies	6/5/2024	8.4.6 - EP_5	BVES_DR070	DR070 - BVES Response WMP community brief 6.docx 6-29-2023 participant list
DR_071	5/30/2024	BV	8.5.4 - COE_3 - Collaboration on local wildfire mitigation planning	6/4/2024	8.5.4 - COE_3	BVES_DR071	Local Wildfire Mitigation Planning
DR_072	NA	Not used	8.1.2.1 - GD_2 - Radford Line Replacement Project	NA	8.1.2.1 - GD_2	BVES_DR072	NA

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BVES Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	BVES DR No.	File Name
DR_073	NA	Not used	8.1.2.3 - GD_5 - Radford Line Replacement Project	NA	8.1.2.3 - GD_5	BVES_DR073	NA
DR_074	4/29/2024	C2	Verification of Funding	5/2/2024	1/0/1900	BVES_DR074	BVES_2023_Q4_Table11_Actuals
DR_078	5/21/2024	BV	8.2.3.7 - VM_13 - Fire-resilient rights-of-way	5/24/2024	8.2.3.7 - VM_14	BVES_DR078	VM_13 Fire-Resilience Right-of-Ways QAQC Procedures R0
DR_079	6/3/2024	BV	All WMP Initiatives	6/6/2024	8.2.3.7 - VM_14	BVES_DR079	Data Request BVES_DR079_Attach - BVES Response
DR075	5/16/2024	BV	NA	5/21/2024	1/0/1900	BVES_DR075	Explanation of Nas

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
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DATA REQUEST

Data Request Number:
BVE_DR001

Name: Barbara Tomajic

WMP Category: WMP Report

Company: BVNA

Data Request Date: 04/12/24
Due Date: 4/17/24

Email:
barbara.tomajic@bureauveritas.com

Phone #: (916)514-4511

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent.
Need to receive this data response first before all others.

Medium = Task Driven Not Critical. Data responses can be received secondary.

Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
NA	NA	2023 Wildfire Mitigation Plan	NA	NA	Document Review	Please provide the official and approved 2023 WMP	High

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BUREAU
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DATA REQUEST

Data Request Number:
BVE_DR002

Name: Barbara Tomajic

WMP Category: Initiative List and Goals

Company: BVNA

Data Request Date: 04/12/24
Due Date: 4/17/24

Email:
barbara.tomajic@bureauveritas.com

Phone #: (916)514-4511

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.

Medium = Task Driven Not Critical. Data responses can be received secondary.

Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
NA	NA	2023 Wildfire Mitigation Plan	NA	NA	Document Review	Please provide the official and approved 2023 Initiative List in an excel format and the final Quarterly Data Report (QDR) in an excel spreadsheet.	High

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DATA REQUEST

Data Request Number:
BVE_DR003

Name: Barbara Tomajic

WMP Category: QA and QC Programs

Company: BVNA

Data Request Date: 04/12/24
Due Date: 4/17/24

Email:
barbara.tomajic@bureauveritas.com

Phone #: (916)514-4511

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.

Medium = Task Driven Not Critical. Data responses can be received secondary.

Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
NA	NA	2023 Wildfire Mitigation Plan	NA	NA	Document Review	Please provide a complete list of existing QA and QC programs with detailed descriptions for each program as referenced in the 2023 WMP.	Medium

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BUREAU
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DATA REQUEST

Data Request Number:
BVE_DR003.b

Name: Barbara Tomajic

WMP Category: QA and QC Programs

Company: BVNA

Data Request Date: 6/10/24
Due Date: 6/13/24

Email:
barbara.tomajic@bureauveritas.com

Phone #: (916)514-4511

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.

Medium = Task Driven Not Critical. Data responses can be received secondary.

Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
NA	NA	2023 Wildfire Mitigation Plan	NA	NA	Document Review	Please provide a complete documents for the QA and QC programs for the following initiatives and attached sample sheet: GD_25, GD_26, GD_27, GD_28, GD_29, GD_30, GD_31, GD_32, COE_1, GD_12, GD_13, GD_14, GD_15, COE_2, CO_4, ST_1, RMA_1, GD_1, GD_21, GD_33, GD_36, GD_37, GD_38, EP_2, EP_3, EP_4, EP_5 , CO_3	High

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVE_DR004

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Field Verifiable

Company: C2 Group

Data Request Date: 04/29/24

Due Date: 05/02/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, and Maintenance	# of Circuit Miles	8.1.2.1 - GD_1 - Covered Conductor Replacement Project	12.9 Total (4.3 for 34.5 kV, 8.6 for 4 kV)	20.7	Documentation	<p>1. Please provide the latitude and longitude locations in an Excel file or GIS geodatabase of the BVES structures that represent the start and stop sections of the Covered Conductor Replacement miles completed and the date of completion for both the 34.5 kV and 4 kV Systems.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "GD_1 Covered Conductor Replacement Project QA/QC Procedures R0" referenced.</p>

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVE_DR005

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Field Verifiable

Company: C2 Group

Data Request Date: 04/29/24

Due Date: 05/02/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, and Maintenance	# of Poles Replaced	8.1.2.3 - GD_4 - Distribution pole replacements and reinforcements	200	309	Documentation	<p>1. Please provide the latitude and longitude locations in an Excel file or GIS geodatabase of the BVES distribution poles replaced or reinforced, including a description of the work completed at each pole (replaced or reinforcement description) and the date of completion for each pole.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "GD_4 Covered Conductor Replacement Project QAQC Procedures Rev 0 (003)"</p>

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVE_DR006

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Field Verifiable

Company: C2 Group

Data Request Date: 04/29/24

Due Date: 05/02/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, and Maintenance	# of Poles with Wire Wrap Mesh	8.1.2.3 - GD_6 - Evacuation Route Hardening Project	500	909	Documentation	<p>1. Please provide the latitude and longitude locations in an Excel file or GIS geodatabase of the BVES Distribution Poles that had wire wrap mesh installed and the installation date of completion for each pole.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "GD_6 Evacuation Route Hardening Project QA/QC Procedures R0"</p>

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVE_DR007

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Field Verifiable

Company: C2 Group

Data Request Date: 04/29/24

Due Date: 05/02/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, and Maintenance	# of Tree Attachments Removed	8.1.2.10 - GD_19 - Tree Attachment Removal Project	100	114	Documentation	<p>1. Please provide the latitude and longitude locations in an Excel file or GIS geodatabase of the BVES Structures and Poles that had the associated tree attachments removed, a description of the service type, identify if the pole was replaced, and the date of the tree attachment removed.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "GD_19 Tree Attachment Removal Project QAQC Procedures R0"</p>

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVE_DR008

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Field Verifiable

Company: C2 Group

Data Request Date: 04/29/24

Due Date: 05/02/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	# of Circuit Miles	8.2.3.3 - VM_9 - Clearance	72	72	Documentation	<p>1. Please provide the latitude and longitude locations in an Excel file or GIS geodatabase of the BVES structures that represent the start and stop sections of the Vegetation Clearances completed miles, date of completion, and a description of the type of vegetation clearance completed.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_9 Clearance QAQC Procedures R0"</p>

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR009

Data Request Date: 05/09/24

Due Date: 5/14/24

Name: John Sniegoski

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target – Not Field Verifiable	Circuit Miles Inspected	WMP Section: 8.1.3.1 Initiative: GD_25	135	135	Document Review	Please provide list of 135 overhead electric distribution lines, equipment, etc. of detailed inspection reports completed (as referenced in WMP Table 8-6, Section 8.1.3.1) available for review in excel format with threat district, risk area, utility region provided on each report line.

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BUREAU
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DATA REQUEST

Data Request Number: BVES_DR009B

Data Request Date: 05/16/24

Due Date: 5/21/24

Name: John Sniegoski

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target – Not Field Verifiable	Circuit Miles Inspected	WMP Section: 8.1.3.1 Initiative: GD_25	135	135	Document Review	<p>The response to DR009 comprised of copies of 13 BVES Circuit Inspection Records that referenced circuit names and locations but did not include how many miles each circuit covered or photographs of inspections.</p> <p>In order to confirm the sample size of 20 circuit miles, please provide the miles covered for each of the 13 Circuit Inspection Records previously provided and also include supporting inspection documents including photos, work orders etc.</p>

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR010

Data Request Date: 05/13/24

Due Date: 5/16/24

Name: 8.1.3.2 Patrol Inspection Program (Tracking ID: GD_26 - VM_2)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large volume quantifiable with targets that are not field-verifiable	Circuit Miles Inspected	8.1.3.2 Patrol Inspection Program (Tracking ID: GD_26 - VM_2)	211	205	Quantitative	Please provide the Patrol inspection annual report findings and include information that associates the report findings with the 211 circuit miles targeted in 2023.

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BUREAU
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DATA REQUEST

Data Request Number: BVES_DR011

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: 8.1.3.3 UAV Thermography (Tracking ID: GD_27)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large volume quantifiable with targets that are not field-verifiable	Circuit Miles Inspected	8.1.3.3 UAV Thermography (Tracking ID: GD_27)	211	205.2	Quantitative	Please provide the UAV thermography annual inspection report findings and include information that associates the report findings with the 211 circuit miles targeted in 2023.

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR011.b

Data Request Date: 05/20/2024

Due Date: 05/23/2024

Name: 8.1.3.3 UAV Thermography (Tracking ID: GD_27)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large volume quantifiable with targets that are not field-verifiable	Circuit Miles Inspected	8.1.3.3 UAV Thermography (Tracking ID: GD_27)	211	205.2	Quantitative	<p>Please provide inspection reports for the 32 locations identified in the attached spreadsheet to indicate how each inspection is tied to the 211 circuit miles identified in the WMP.</p> <p>Please provide PDF copies of inspection reports. If inspection reports are not available, please provide a written response indicating why they are not available and provide specific data points that are available for each of the 125 locations showing how inspections were performed.</p>

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR012

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: 8.1.3.4 UAV HD Photography/Videography
(Tracking ID: GD_28 – VM_3)

WMP Category: Grid Design, Operations and
Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large volume quantifiable with targets that are not field-verifiable	Circuit Miles Inspected	8.1.3.4 UAV HD Photography/Videography (Tracking ID: GD_28 – VM_3)	211	205.2	Quantitative	Please provide the UAV HD Photography/videography inspection annual report findings and include information that associates the report findings with the 211 circuit miles targeted in 2023.

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR013

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: 8.1.3.5 LiDAR Inspection (Tracking ID: GD_29 – VM_4)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large volume quantifiable with targets that are not field-verifiable	Circuit Miles Inspected	8.1.3.5 LiDAR Inspection (Tracking ID: GD_29 – VM_4)	211	205.2	Quantitative	Please provide the Lidar inspection annual report findings and include information that associates the report findings with the 211 circuit miles targeted in 2023.

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR014

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: 8.1.3.6 3rd Party Ground Patrol (Tracking ID: GD_30 – VM_5)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large volume quantifiable with targets that are not field-verifiable	Circuit Miles Inspected	8.1.3.6 3rd Party Ground Patrol (Tracking ID: GD_30 – VM_5)	211	205.2	Quantitative	Please provide the 3rd party ground patrol inspection annual reports/findings and include information that associates the findings with the 211 circuit miles targeted in 2023.

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DATA REQUEST

Data Request Number: BVES_DR014.b

Data Request Date: 05/20/2024

Due Date: 05/23/2024

Name: 8.1.3.6 3rd Party Ground Patrol (Tracking ID: GD_30 – VM_5)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large volume quantifiable with targets that are not field-verifiable	Circuit Miles Inspected	8.1.3.6 3rd Party Ground Patrol (Tracking ID: GD_30 – VM_5)	211	205.2	Quantitative	Please provide inspection reports for the 32 locations identified in the attached spreadsheet from response DR 14 to indicate how each inspection is tied to the 211 circuit miles identified in the WMP. If inspection reports are not available, please provide a written response indicating why they are not available. If the inspection report coordinates can not be associated with a circuit in the inspection reports or any other provided data points, please clarify in the written response why they are not coordinated.

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR015

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: 8.1.3.7 Intrusive Pole Inspection (Tracking ID: GD_31)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large volume quantifiable with targets that are not field-verifiable	Intrusive pole inspections	8.1.3.7 Intrusive Pole Inspection (Tracking ID: GD_31)	850	850	Quantitative	Please a list of 850 pole locations targeted in 2023. Include for each location: pole age, pole loading data, and metric used for risk assessment. If documentation of HFTD Tier 2 or 3 is available for these locations, they should also be provided for each location.

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR016

Data Request Date: 05/13/2024

Due Date: 05/16/202

Name: 8.1.3.8 Substation Inspection (Tracking ID: GD_32 – VM_6)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large volume quantifiable with targets that are not field-verifiable	Substation Inspections	8.1.3.8 Substation Inspection (Tracking ID: GD_32 – VM_6)	156	144.0	Quantitative	Provide copies of 156 substation inspections for each month for all 13 substations. (If this is cumbersome, utility may instead elect to respond to this request by providing a list of all substations showing HFTD Tier identified for each substation, and identifying all reports where relays have been replaced. Another DR will then be required for the utility to provide 20 inspection reports to be selected by auditing staff)

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR017

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Not Field Verifiable

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Circuit Miles Inspected	8.2.2.1 - VM_1 - Detailed Inspections	134.5	135	Documentation	<p>1. Please provide the latitude and longitude locations in an Excel file or GIS geodatabase of the BVES Structures and Poles that underwent Detailed Inspections, inspection miles completed, and the dates of completed inspections.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_1 Detailed Inspections QA/QC Procedures R0"</p>

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR018

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Not Field Verifiable

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Circuit Miles Inspected	8.2.2.1 - VM_2 - Patrol Inspections	205.2 ¹	205.2	Documentation	<p>1. Please provide the latitude and longitude locations in an Excel file or GIS geodatabase of the BVES Structures and Poles that underwent Patrol Inspections, inspection miles completed, and the dates of completed inspections.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_2 Patrol Inspections QAQC Procedures R0"</p> <p>3. Please clarify the difference in the annual target for this initiative identified in the WMP table 8-15 Vegetation Inspection Targets by year as 211 circuit miles and identified in the Q1-Q4 QDR Table 1 "AnnualQuantTarget" as 206.7 circuit miles.</p>

1. Per note provided in Q3 and Q4 QDR Table 1 "CorrectiveActionsIfDelayed" column, annual target is adjusted following GIS layer updates.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR019

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Not Field Verifiable

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Circuit Miles Inspected	8.2.2.1 - VM_3 - UAV HD Photography/Videography	205.2 ¹	205.2	Documentation	<p>1. Please provide the latitude and longitude locations in an Excel file or GIS geodatabase of the BVES Structures and Poles that underwent UAV HD Photography / Videography inspections, inspection miles completed, and the dates of completed inspections.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_3 UAV Photography and Videography QAQC Procedures R0"</p> <p>3. Please clarify the difference in the annual target for this initiative identified in the WMP table 8-15 Vegetation Inspection Targets by year as 211 circuit miles and identified in the Q1-Q4 QDR Table 1 "AnnualQuantTarget" as 206.7 circuit miles.</p>

1. Per note provided in Q3 and Q4 QDR Table 1 "CorrectiveActionsIfDelayed" column, annual target is adjusted following GIS layer updates.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR019.1

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Not Field Verifiable

Company: C2 Group

Data Request Date: 05/28/2024

Due Date: 05/31/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Circuit Miles Inspected	8.2.2.1 - VM_3 - UAV HD Photography/Videography	205.21	205.2	Portal Access	Please provide access to the portal for UAV HD Photography/Videography data for review.

1. Per note provided in Q3 and Q4 QDR Table 1 "CorrectiveActionsIfDelayed" column, annual target is adjusted following GIS layer updates.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR020

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Not Field Verifiable

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Circuit Miles Inspected	8.2.2.1 - VM_4 - LiDAR Inspection	205.2 ¹	205.2	Documentation	<p>1. Please provide the latitude and longitude locations of the BVES structures that represent the start and stop sections of the LiDAR Inspections, miles completed. and the dates of the completed inspections.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_4 LiDAR Inspections QAQC Procedures R0"</p> <p>3. Please clarify the difference in the annual target for this initiative identified in the WMP table 8-15 Vegetation Inspection Targets by year as 211 circuit miles and identified in the Q1-Q4 QDR Table 1 "AnnualQuantTarget" as 206.7 circuit miles.</p>

1. Per note provided in Q3 and Q4 QDR Table 1 "CorrectiveActionsIfDelayed" column, annual target is adjusted following GIS layer updates.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR020.1

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Not Field Verifiable

Company: C2 Group

Data Request Date: 05/28/2024

Due Date: 05/31/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Circuit Miles Inspected	8.2.2.1 - VM_4 - LiDAR Inspection	205.2 ¹	205.2	SME Interview	Please schedule a SME interview to review and discuss the progress on this initiative.

1. Per note provided in Q3 and Q4 QDR Table 1 "CorrectiveActionsIfDelayed" column, annual target is adjusted following GIS layer updates.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR021

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Not Field Verifiable

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Circuit Miles Inspected	8.2.2.1 - VM_5 - 3rd Party Ground Patrol	205.2 ¹	205.2	Documentation	<p>1. Please provide the latitude and longitude locations in an Excel file or GIS geodatabase of the BVES Structures and Poles that underwent 3rd Party Ground Patrol Inspections, inspection miles completed, and the dates of completed inspections.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_5 3rd Party Ground Patrol R0"</p> <p>3. Please clarify the difference in the annual target for this initiative identified in the WMP table 8-15 Vegetation Inspection Targets by year as 211 circuit miles and identified in the Q1-Q4 QDR Table 1 "AnnualQuantTarget" as 206.7 circuit miles.</p>

1. Per note provided in Q3 and Q4 QDR Table 1 "CorrectiveActionsIfDelayed" column, annual target is adjusted following GIS layer updates.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR021.1

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Not Field Verifiable

Company: C2 Group

Data Request Date: 6/10/2024

Due Date: 06/13/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Circuit Miles Inspected	8.2.2.1 - VM_5 - 3rd Party Ground Patrol	205.2 ¹	205.2	Documentation	1. Please provide the inspection reports for the inspections identified in the attached spreadsheet representing 34 circuit miles per the updated overhead mileage provided in response to DR_014.b

1. Per note provided in Q3 and Q4 QDR Table 1 "CorrectiveActionsIfDelayed" column, annual target is adjusted following GIS layer updates.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR022

Name: Tatiana Friesen

WMP Category: Large Volume Quantifiable

Goal/Target - Not Field Verifiable

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Number of Substations Inspected	8.2.2.1 - VM_6 - Substation inspections	144	144	Documentation	<p>1. Please provide the latitude and longitude of BVES Substation locations in an Excel file or GIS geodatabase of the BVES Substations that completed inspections and the dates of the completed inspections.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_6 QAQC Substation Inspections R0"</p>

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: Bear Valley DR023

Data Request Date: 05/31/24

Due Date: 06/05/24

Name: Trampas Shook

WMP Category: Community outreach

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable/ Not Field Verifiable	# of public outreach and education events	8.5.2- COE 1 Public outreach and education awareness	360	829	Document Review	Provide tabular list of communities that were targeted per WMP section 8.5.2 COE_1 education and outreach surveys geographic location shown, and if outreach was completed. This can include a list of targets and completion for each survey, and may be supported by digital correspondences where available.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR024

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: Substation Automation Project (GD_12)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small volume quantifiable targets	Number of Substations Automated and Connected to SCADA	Substation Automation Project (GD_12)	3	3	Quantitative	Provide documentation of Quantitative method used to verify connection of the 3 identified substations to SCADA in 2023. The documentation should provide means of identifying each of the 3 substation locations, and when connectivity was established. Provide copies of at least 3 reports confirming installation of associated hardware at each location in 2023.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR025

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: Fault Isolation Localization and Service Restoration (FLISR) (GD_13) 8.1.2.8

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small volume quantifiable targets	Number of Field Switches Automated and Connected to SCADA	Fault Isolation Localization and Service Restoration (FLISR) (GD_13) 8.1.2.8	13	13	Quantitative	Provide documentation confirming the installation of hardware and operational status of the nine smart high voltage switches, three existing auto-reclosers, and one auto-transfer switch on the 34.5 kV system. The documentation should identify location information for each of the 13 locations. Hardware documentation should prioritize identification of sectionalizing equipment.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR026

Data Request Date: 05/09/24

Due Date: 5/14/24

Name: John Sniegoski

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100 items) Volume Quantifiable Goal/Target	Number of Capacitor Banks Replaced and Connected to SCADA	WMP Section: 8.1.2.8 Initiative: GD_14	6	6	Document Review	Please provide a list of equipment and devices installed for this activity for the (6) - locations completed in Excel Format showing locations & risk ratings.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR026.b

Data Request Date: 05/22/24

Due Date: 5/28/24

Name: John Sniegowski

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100 items) Volume Quantifiable Goal/Target	Number of Capacitor Banks Replaced and Connected to SCADA	WMP Section: 8.1.2.8 Initiative: GD_14	6	6	Document Review	Please provide a list of equipment and devices installed for this activity for the (6) - locations completed in Excel Format showing locations & risk ratings.
Small (less than 100 items) Volume Quantifiable Goal/Target	Number of Capacitor Banks Replaced and Connected to SCADA	WMP Section: 8.1.2.8 Initiative: GD_14	2	2	Desktop Review - Detailed Inspection Reports (ANSI-Sampling)	Please provide (2)-detailed inspection reports for Capacitor Banks installed as follows: (1) - C70227BV (2) - C9665BV with photos and testing data matrix. As per BVES list provided in DR026 on 5/9

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR027

Data Request Date: 05/09/24

Due Date: 5/14/24

Name: John Sniegoski

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100 items) Volume Quantifiable Goal/Target	Number of Fuse TripSavers Automated and Connected to SCADA	WMP Section: 8.1.2.8 Initiative: GD_15	10	10	Document Review	Please provide a list of equipment and devices installed for this activity for the (10) - locations completed in Excel Format showing locations & risk ratings.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR027.b

Data Request Date: 05/22/24

Due Date: 5/28/24

Name: John Sniegoski

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100 items) Volume Quantifiable Goal/Target	Number of Fuse TripSavers Automated and Connected to SCADA	WMP Section: 8.1.2.8 Initiative: GD_15	10	10	Document Review	Please provide a list of equipment and devices installed for this activity for the (10) - locations completed in Excel Format showing locations & risk ratings.
Small (less than 100 items) Volume Quantifiable Goal/Target	Number of Fuse TripSavers Automated and Connected to SCADA	WMP Section: 8.1.2.8 Initiative: GD_15	2	2	Detailed Inspection Reports (ANSI-Sampling)	Please provide (3)-detailed inspection reports for the TripSavers installed as follows: 1. TS 901 2. TS 624 3. TS 435 with photos and testing data matrix. As per BVES list provided on 5/16 DR027.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR028

Name: Tatiana Friesen

WMP Category: Small (less than 100 items) Volume
Quantifiable Goal/Target

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, and Maintenance	Number of Asset QCs on WMP Work	8.1.6 - GD_35 - Asset Quality assurance/ quality control	20	20	Documentation	<ol style="list-style-type: none"> 1. Please provide a list of the Asset QCs completed on WMP work. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "GD_35 QAQC Management and Inspection Enterprise System Procedures R0"

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR028.1

Name: Tatiana Friesen

WMP Category: Small (less than 100 items) Volume
Quantifiable Goal/Target

Company: C2 Group

Data Request Date: 05/22/2024

Due Date: 05/28/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, and Maintenance	Number of Asset QCs on WMP Work	8.1.6 - GD_35 - Asset Quality assurance/ quality control	20	20	Documentation / Interview	Please provide documentation for the completed QAQC audits in the attached spreadsheet "BVES - Data Request BVES_DR028.1 - GD_35 Asset QAQC Sample" If detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the progress on this initiative.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR029

Name: Tatiana Friesen

WMP Category: Small (less than 100 items) Volume
Quantifiable Goal/Target

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Number of trees remediated or removed to prevent fall-in	8.2.3.4 - VM_10 - Fall-in mitigation	88	168	Documentation	1. Please provide the latitude and longitude locations in an Excel file or GIS geodatabase of the trees removed and the date of the tree removal. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_10 Fall-in Mitigation QAQC Procedures R0"

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR029.1

Name: Tatiana Friesen

WMP Category: Small (less than 100 items) Volume
Quantifiable Goal/Target

Company: C2 Group

Data Request Date: 05/22/2024

Due Date: 05/28/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Number of trees remediated or removed to prevent fall-in	8.2.3.4 - VM_10 - Fall-in mitigation	88	168	Documentation / Interview	Please provide documentation for completed tree removal in the attached spreadsheet "BVES - Data Request BVES_DR029.1 - Tree Removal Sample" If detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the progress on this initiative.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR030

Name: Tatiana Friesen

WMP Category: Small (less than 100 items) Volume
Quantifiable Goal/Target

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Substations inspected and cleared	8.2.3.5 - VM_11 - Substation defensible space	13	13	Documentation	1. Please provide a list of the substation locations where defensible space inspections were completed and the dates of the completed inspections. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_11 Substation Defensible Space R0"

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR030.1

Name: Tatiana Friesen

WMP Category: Small (less than 100 items) Volume
Quantifiable Goal/Target

Company: C2 Group

Data Request Date: 05/22/2024

Due Date: 05/28/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Substations inspected and cleared	8.2.3.5 - VM_11 - Substation defensible space	13	13	Documentation / Interview	Please provide documentation for the completed substation defensible space inspections in the attached spreadsheet "BVES - Data Request BVES_DR030.1 - Substation Defensible Space Sample" If detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the progress on this initiative.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



DATA REQUEST

Data Request Number: BVES_DR031

Name: Tatiana Friesen
 WMP Category: Small (less than 100 items) Volume
 Quantifiable Goal/Target
 Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	Number of Vegetation Management Audits	8.2.5 - VM_16 - Vegetation Management Quality assurance / quality control	5	5	Documentation	1. Please provide the completed vegetation management audits including the date of completion. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "BVES Vegetation Management and Vegetation QA/QC Programs" 3. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_16 QAQC Vegetation Management Procedures R0" 4. Please describe the relationship between the annual target for this initiative identified in the WMP in Table 8-14 Vegetation Management Initiative Targets by Year stated as 72 Vegetation QCs and the annual target identified in the Quarterly Data Reports for Q1 - Q4 in table 1 as 5 Vegetation Management Audits.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR032

Name: Tatiana Friesen

WMP Category: Small (less than 100 items) Volume
Quantifiable Goal/Target

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Situational Awareness and Forecasting	Number of Fis installed.	8.3.3 - SAF_2 - Install Fault Indicators	30	35	Documentation	1. Please provide the latitude and longitude in an Excel file or GIS geodatabase of locations where Fault Indicators were installed and the date of installation. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "SAF_2 Install Fault Indicators QAQC Procedures R0"

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR032.1

Name: Tatiana Friesen

WMP Category: Small (less than 100 items) Volume
Quantifiable Goal/Target

Company: C2 Group

Data Request Date: 05/22/2024

Due Date: 05/28/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Situational Awareness and Forecasting	Number of Fis installed.	8.3.3 - SAF_2 - Install Fault Indicators	30	35	Documentation / Interview	Please provide documentation for the completed installation of the fault indicators in the attached spreadsheet "BVES - Data Request BVES_DR032.1 - Fault Indicator Sample" If detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the progress on this initiative.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR033

Name: Tatiana Friesen

WMP Category: Small (less than 100 items) Volume
Quantifiable Goal/Target

Company: C2 Group

Data Request Date: 05/06/2024

Due Date: 05/09/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Situational Awareness and Forecasting	Number of circuits installed on per year.	8.3.3 - SAF_3 - Online Diagnostic System	1	2	Documentation	<p>1. Please provide a list of the circuits with grid monitoring systems installed including the date of installation completion along with outputs of the monitoring reports of installed sensors.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "SAF_3 Online Diagnostic System QAQC Procedures R0"</p> <p>3. Please clarify the difference in quantity for the annual target his initiative identified in the WMP table 8-23 Situational Awareness Initiative Targets by year as 2 circuits and identified in the Q1-Q4 QDR Table 1 "AnnualQuantTarget" as 1 circuit.</p>



DATA REQUEST

Data Request Number: BVES_DR033.1

Name: Tatiana Friesen

WMP Category: Small (less than 100 items) Volume

Quantifiable Goal/Target

Company: C2 Group

Data Request Date: 05/22/2024

Due Date: 05/28/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Situational Awareness and Forecasting	Number of circuits installed on per year.	8.3.3 - SAF_3 - Online Diagnostic System	1	2	Documentation / Interview	Please provide documentation for the completion of installation of the grid monitoring systems. If detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the progress on this initiative.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR034

Data Request Date: 05/31/24

Due Date: 06/05/24

Name: Trampas Shook

WMP Category: Community outreach

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100) Volume quantifiable	AFN Customer needs verification	8.5.3 - COE_2 - Engagement with access and functional needs populations	12	24	Document Review	Provide tabular list of communities that were targeted per WMP section 8.5.3 COE_2 education and outreach surveys geographic location shown, and if outreach was completed. This can include a list of targets and completion for each survey, and may be supported by digital correspondences where available.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR035

Data Request Date: 05/31/24

Due Date: 06/05/24

Name: Trampas Shook

WMP Category: Community outreach and engagement

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100) Volume quantifiable	Working Groups, Conferences	8.5.5 - COE_4 - Best practice sharing with other utilities	15	120	Document Review	Provide tabular list of communities that were targeted per WMP section 8.5.5 COE_3 Working Groups/ Conferences. geographic location shown, and if outreach was completed. This can include a list of targets and attendees, and may be supported by digital correspondences where available.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR036

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: 5.4.5 Environmental Compliance and Permitting (Tracking ID: ST_1)

WMP Category: Overview of the Service Territory

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target					Qualitative	Provide at least one PDF document of BVES environmental compliance and permitting procedures for 2023. The documentation should be identified by type; e.g. internal memo, utility bulletin, email, published operating procedure, etc. Identify any changes in the procedures since the last procedure documentation update or since the 2022 WMP.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: Bear Valley DR037

Data Request Date: 05/30/24

Due Date: 06/04/24

Name: Dave Stoddard

WMP Category: Risk Methodology and Assessment

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Development and use of tools and processes to assess the risk of wildfire and PSPS across an electrical corporation's service territory.	Section 6 - RMA_1 - Technosylva Contractor. Program implemented and ongoing. (See section 8.3.5.1 as well.)	Maintain real time risk mapping	Yearly	Document Review	Please provide documentation of the program implemented by BVES and the contractor (Technosylva) that is used to provide risk mapping, as well as the tools and processes used to assess wildfire risk and PSPS in BVES service territory. Provide documentation of training for BVES staff on WFA-E model. These should be in PDF, Word, and or Excel format.

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DATA REQUEST

Data Request Number: BVES_DR038

Data Request Date: 5/29/24

Due Date: 6/4/24

Name: Dave Stoddard

WMP Category: Wildfire Mitigation Strategy
Development

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target		Section 7 - WMSD_1 Wildfire Mitigation Strategy Development	Not provided		Document Review	<p>Q1. Provide documentation that describes BVES procedures for the ongoing evaluation of the efficacy of the Grid Operation Monitoring Program in Section 8.3.3.4 (Evaluating Mitigation Initiatives) Page 239 of the 2023 WMP.</p> <p>Q2. Provide documentation of the evaluation process required for determining need if additional ignition detection technologies within the BVES operational areas per Section 8.3.4.2 (Evaluation and Selection of New Detection Systems) Page 246, and Section 8.3.2.2 (Evaluation and Selection of New Systems) page 236 of the 2023 WMP.</p> <p>Q3. Provide documentation and supporting information of BVES procedures for ongoing evaluation of the efficacy of fire detection systems within the Evaluating Mitigation Initiatives. This may include but not be limited to</p>

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						<p>inspections, reports or meeting minutes from contractors (Technosylva), local response agencies, and CA Fire documenting the discussion or inspection and any findings for fire detection system(s). This is described in Section 8.3.4.4 (Evaluating Mitigation Initiatives) Page 245 of the 2023 WMP. Please provide any supporting documentation in PDF, Excel or Word format</p>
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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR039

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, and Maintenance	N/A	8.1.2.2 - GD_3 - Minor Undergrounding Upgrades Projects	N/A	N/A	Documentation	1. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "GD_3 Minor Undergrounding Upgrades Projects QAQC Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR041

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, and Maintenance	N/A	8.1.2.5 - GD_8 - Traditional overhead hardening	N/A	N/A	Documentation	<p>1. Please provide details for any maintenance, repair, and replacement activities conducted for capacitors, circuit breakers, cross-arms, transformers, fuses, and connectors.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "GD_8 Traditional overhead hardening QAQC Procedures R0"</p>

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR042

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: Energy Storage/Solar Energy Project (GD_10)

8.1.2.7

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Preform Necessary Project Action	Energy Storage/Solar Energy Project (GD_10) 8.1.2.7	No Action	No Action	Qualitative	Please provide the following documentation in PDF format: Confirmation of the submission of the Bear Valley Solar Energy Project to the CPUC and the County of San Bernardino in 2023, including any correspondence or confirmation of receipt.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
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DATA REQUEST

Data Request Number: BVES_DR043

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: Bear Valley Energy Storage Facility (GD_11)

8.1.2.7

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Preform Necessary Project Action	Bear Valley Energy Storage Facility (GD_11) 8.1.2.7	No Action	No Action	Qualitative	<p>Please provide the following documentation in PDF format:</p> <ol style="list-style-type: none"> 1. At least one document related to the planning and development of the Bear Valley Energy Storage Facility project. (e.g. meeting minutes, memos, email correspondence, etc.) 2. At least one planning document outlining the scope, timeline, or objectives of the energy storage project. 3. At least one document showing how impact to PSPS was assessed for the Bear Valley Energy Storage Facility project <p>If any of these 3 are not available, please provide a written response a indicating for each why that information is not available.</p>

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BUREAU
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DATA REQUEST

Data Request Number: BVES_DR044

Data Request Date: 05/09/24

Due Date: 5/14/24

Name: John Sniegoski

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	N/A	WMP Section: 8.1.2.8 Initiative: GD_16 Server Room	N/A	N/A	Document Review	Please provide a list of equipment and devices installed for this activity at the location(s) completed in Excel Format showing scope of work details.

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR045

Data Request Date: 05/09/24

Due Date: 05/14/24

Name: John Sniegoski

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	N/A	WMP Section: 8.1.2.9 Initiative: GD_18 - Line Removals in HFTD Areas	N/A	N/A	Document Review	Please provide a list of equipment, conductors, poles or devices removed for this activity (If any or pending) at location(s) completed in Excel Format.

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR046

Data Request Date: 5/30/24

Due Date: 6/4/24

Name: Dave Stoddard

WMP Category: Grid Design, Operations, and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Project milestones	8.1.2.11 - GD_20: Other grid topology improvements to mitigate or reduce PSPS events	Not provided		Document Review or Project Milestones	Subsequent to Table 8-3 on Page 118 of the 2023 WMP please provide confirmation that BVES did not conduct any projects within the 2023 WMP Planning Cycle for Initiative 8.1.2.11 GD_20 – “other grid topology improvements to mitigate or reduce PSPS events” as described in section 8.1.2.11.

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BUREAU
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DATA REQUEST

Data Request Number: BVES_DR047

Data Request Date: 05/20/2024

Due Date: 05/23/2024

Name: 8.1.2.12 and/or 8.1.2.11 (Tracking ID: GD_21)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Project Milestones for Natural Engine Upgrades	8.1.2.12 and/or 8.1.2.11 (Tracking ID: GD_21)	32%		Project Timeline and Budget	<p>Please provide for 32% of project milestones for phase 4 natural engine upgrades. Examples of documentation may include the following as PDF documents:</p> <ol style="list-style-type: none"> 1. Project timeline and budget for Phase Four activities in 2023, including plans for installing updated engine controls, replacing Detonation Sensing Module (DSM) Controls, and replacing governor speed control systems on all engines. 2. Detailed records of the installation of updated engine controls, detcon systems, and ProAct systems with EX Gen control, including any visual monitoring and repair of faulty

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

					<p>wiring.</p> <p>3. Documentation confirming the completion of Phase Three upgrades, specifically related to installing new catalyst housing, relocating oil and water piping, battery boxes, and controller stands, and aligning generators to limit vibrations and abnormal wear.</p> <p>4. Any reports or data indicating the impact of the activity on PSPS risk reduction, particularly in terms of minimizing extended outages for Bear Valley customers during PSPS events.</p> <p>If any of these 4 are not available, please provide a written response indicating for each why that information is not available. Please also clarify if the correct WMP section for this initiative is 8.1.2.11 or 8.1.2.12</p>
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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR048

Data Request Date: 05/20/2024

Due Date: 05/23/2024

Name: 8.1.4.2 Circuit Breakers (Tracking ID: GD_8 – GD_23)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Project Milestones for Natural Engine Upgrades	8.1.4.2 Circuit Breakers (Tracking ID: GD_8 – GD_23)	32%		Project Timeline and Budget	<p>1. Please provide documentation confirming the completion of 32% of the project milestones for the Lake Substation upgrades in 2023. (E.g.; project timeline updates, budget expenditure reports, and any relevant meeting minutes or planning documents)</p> <p>2. Additionally, please provide written clarification on how the targets identified for this initiative in section 8.1.1.2 of the WMP correspond to the tracking ID: GD_8 - GD_23 in section 8.1.4.2 of the WMP. Please provide written clarification of the WMP objective and indicate if any supporting documentation is available to show that the objective has been met for 2023 if this is not already met by part 1 of this request.</p>

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BUREAU
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DATA REQUEST

Data Request Number: BVES_DR049

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: 8.1.4.3 Connectors, Including Hotline Clamps
(Tracking ID: GD_33)

WMP Category: Grid Design, Operations and
Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	As Needed Maintenance (% of Budget)	8.1.4.3 Connectors, Including Hotline Clamps (Tracking ID: GD_33)	100%		Qualitative	Please provide documentation confirming that 100% of the budget allocated for equipment maintenance and repair has been utilized in 2023. This documentation may include a budget review report detailing the allocation and expenditure of funds specifically for equipment maintenance and repair activities. Additionally, please provide any relevant maintenance logs, work orders, or reports demonstrating the completion of maintenance tasks for connectors, including hotline clamps, as outlined in the WMP section.

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DATA REQUEST

Data Request Number: BVES_DR050

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: 8.1.7 Open Work Orders (Tracking ID: GD_36)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	No discrepancies exceeding GO95 resolution timeframes	8.1.7 Open Work Orders (Tracking ID: GD_36)	All WO resolved within GO 95 Timeframe		Qualitative	Please provide a summary document of the open work order management process, including procedures, prioritization criteria based on risk, and plans for addressing any backlog of work orders

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DATA REQUEST

Data Request Number: BVES_DR051

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: 8.1.8.1 Equipment Settings to Reduce Wildfire Risk (Tracking ID: GD_37)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Review and Evaluate System Settings	8.1.8.1 Equipment Settings to Reduce Wildfire Risk (Tracking ID: GD_37)			Qualitative	<p>Please provide details on the equipment settings implemented by BVES to reduce wildfire risk including:</p> <ol style="list-style-type: none"> 1. Automatic recloser settings and number of circuit miles capable of utilizing settings. 2. Operations procedures for responding to off-normal events related to these settings 3. Protocols implemented in 2023 for transitioning from NFDRS-based protocols to WFA-E-based operational decisions <p>If any of these 3 are not available, please provide a written response a indicating for each why that information is not available.</p>

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BUREAU
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DATA REQUEST

Data Request Number: BVES_DR052

Data Request Date: 05/13/2024

Due Date: 05/16/2024

Name: 8.1.8.2 Grid Response Procedures and Notifications (Tracking ID: GD_38)

WMP Category: Grid Design, Operations and Maintenance

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Review and Update Procedure Annually	8.1.8.2 Grid Response Procedures and Notifications (Tracking ID: GD_38)	Finalize Review		Qualitative	<p>Please provide details on BVES's operational procedures for responding to faults, ignitions, or other issues detected on its grid that may result in a wildfire, including:</p> <ol style="list-style-type: none"> 1. Procedures for notifying relevant personnel and suppression resources to respond to these issues. 2. BVES communication procedure for coordination with firefighting authorities such as the Big Bear Fire Department and Cal Fire in case of ignitions or wildfires. <p>If either of these 2 are not available, please provide a written response indicating for each why that information is not available.</p>

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR053

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, and Maintenance	N/A	8.1.8.3 - GD_39 - Personnel Work Procedures and Training in Conditions of Elevated Fire Risk	N/A	N/A	Documentation	<ol style="list-style-type: none"> 1. Please provide documentation of the completed annual procedure review, a copy of the updated procedure, and verification of annual training. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "GD_39 QAQC Personnel Work Procedures and Training in Conditions of Elevated Fire Risk Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR054

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, and Maintenance	N/A	8.1.9 - GD_40 - Asset Workforce Planning	N/A	N/A	Documentation	<ol style="list-style-type: none"> 1. Please provide documented verification of the appropriate staffing levels for wildfire related activities. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "GD_40 QAQC Asset Workforce Planning Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR055

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	N/A	8.2.3.1 - VM_7 - Pole clearing	N/A	N/A	Documentation	1. Please provide documentation that the procedure was reviewed and updated and a copy of the updated procedure. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_7 Pole Clearing QAQC Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR056

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	N/A	8.2.3.2 - VM_8 - Wood and slash management	N/A	N/A	Documentation	<ol style="list-style-type: none"> 1. Please provide a copy of the procedure to manage downed wood and "slash" and documentation that the contractor adhered to the waste removal requirements. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_8 Wood and slash management QAQC Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR057

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	N/A	8.2.3.6 - VM_12 - High-risk species	N/A	N/A	Documentation	<ol style="list-style-type: none"> 1. Please provide documentation related to the remediation of high-risk species. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_12 High-Risk Species QAQC Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR058

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	N/A	8.2.3.8 - VM_14 - Emergency response vegetation management	N/A	N/A	Documentation	<ol style="list-style-type: none"> 1. Please provide documentation that the procedure for planning and execution of vegetation activities in response to emergency situations was reviewed and updated and a copy of the updated procedure. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_14 Emergency Response Vegetation Management QAQC Procedures R0"



DATA REQUEST

Data Request Number: BVES_DR059

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	N/A	8.2.4 - VM_15 - Vegetation management enterprise system	N/A	N/A	Documentation	1. Please provide documentation that the procedure for updates to the centralized vegetation management and inspection enterprise system(s) was reviewed and updated and a copy of the updated procedure. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_15 Vegetation Management Enterprise System QAQC Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR060

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	N/A	8.2.6 - VM_17 - Vegetation Management Open work orders	N/A	N/A	Documentation	1. Please confirm that no open work orders were logged in 2023 or provide documentation of compliance with the corrective action timeframe for any open work orders. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_17 Vegetation Management Open Work QAQC Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR061

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	N/A	8.2.7 - VM_18 - Vegetation Management Workforce planning	N/A	N/A	Documentation	1. Please provide documentation of verification that current staffing level (internal & contractors) meets need. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_18 Vegetation Management Workforce Planning QAQC Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR062

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Situational Awareness and Forecasting	N/A	8.3.2 - SAF_1 - Advanced weather monitoring and weather stations	N/A	N/A	Documentation	1. Please provide maintenance records for the 20 weather monitoring stations. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "SAF_1 QAQC Advanced Weather Monitoring and Weather Stations Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR063

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Situational Awareness and Forecasting	N/A	8.3.4 - SAF_4 - HD ALERTWildfire Cameras	N/A	N/A	Documentation	1. Please provide maintenance records for the 15 ALERTWildfire HD cameras if applicable. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "SAF_4 QAQC ALERTWildfire cameras R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR064

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Situational Awareness and Forecasting	N/A	8.3.5 - SAF_5 - Weather forecasting	N/A	N/A	Documentation	<ol style="list-style-type: none"> 1. Please provide documentation of the ongoing monitoring and maintenance for the Technosylva platform. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "SAF_5 Weather Forecasting R0"

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR065

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Situational Awareness and Forecasting	N/A	8.3.6 - SAF_6 - Fire potential index	N/A	N/A	Documentation	<p>1. Please provide documentation of ongoing monitoring and maintenance for the Fire Potential Index/landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions.</p> <p>2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "SAF_6 QAQC Fire Potential Index R0"</p>

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR066

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Emergency Preparedness	N/A	8.4.2 - EP_1 - Emergency preparedness plan	N/A	N/A	Documentation	1. Please provide documentation of the review and evaluation of the PSPS Program and Emergency Plan. 2. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "EP_1 QAQC Emergency Preparedness Plan Procedures R0"

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BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR067

Data Request Date: 05/31/24

Due Date: 06/5/24

Name: Trampas Shook

WMP Category: Emergency Preparedness

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	N/A	8.4.3 - EP_2 - External collaboration and coordination	NA	NA	Document Review	Provide tabular list of communities that were targeted per WMP section 8.4.3 EP_2 Actions taken to coordinate wildfire and PSPS emergency preparedness if outreach was completed. This can include a list of targets and attendees, and may be supported by digital correspondences where available. Please be as specific as possible with supporting documentation.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR068

Data Request Date: 05/31/24

Due Date: 06/05/24

Name: Trampas Shook

WMP Category: Emergency Preparedness

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	N/A	8.4.4 EP_3 Public emergency communication strategy	NA	NA	Document Review	Provide tabular list of communities that were targeted per WMP section 8.4.4 EP_3 Development and integration of a comprehensive communication strategy. please include full strategy for review. please include if outreach was completed. This can include a list of targets and attendees, and may be supported by digital correspondences where available.) Please be as specific as possible with supporting documentation.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR069

Data Request Date: 05/31/24

Due Date: 06/05/24

Name: Trampas Shook

WMP Category: Emergency Preparedness

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	N/A	8.4.5 EP_4 customer support in wildfire and PSPS emergencies	NA	NA	Document Review	Provide tabular list of communities that were targeted per WMP section 8.4.5 EP_4 . Development and integration of the Electrical corporations plan to restore service after outage due to wildfire or PSPS event. please include if outreach was completed. This can include a list of targets and attendees, and may be supported by digital correspondences where available. Please be as specific as possible with supporting documentation.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR070

Data Request Date: 05/31/24

Due Date: 06/05/24

Name: Trampas Shook

WMP Category: Emergency Preparedness

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	N/A	8.4.6 EP_5 customer support in wildfire and PSPS emergencies	NA	NA	Document Review	Provide tabular list of communities that were targeted per WMP section 8.4.6 EP_5 . Development and deployment of programs to support residential and non residential customers during wildfire or PSPS events. please include if outreach was completed. This can include a list of targets and attendees, and may be supported by digital correspondences where available. Pease be as specific as possible with supporting documentation.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



DATA REQUEST

Data Request Number: BVES_DR071

Data Request Date: 5/30/24

Due Date: 6/4/24

Name: Dave Stoddard

WMP Category: Wildfire Mitigation Planning

Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Not Identified	8.5.4 - COE_3 - Collaboration on local wildfire mitigation planning	Local Wildfire Mitigation Planning Program		Document Review	<p>DR1: Please provide documents, agreements, attendance sign in sheets, or other appropriate documentation of plans, procedures, programs, or protocols that exist within this initiative. Table 8-55 on page 347 indicates that a program to collaborate on local wildfire mitigation planning was completed in 2023. Please provide documentation of this program.</p> <p>DR2: Provide documentation of meetings held within 2023 with local stakeholders; see Table 8-61 on Page 357. Note – this table indicates that all meetings were held in 2022, with one planned for 2023 with the Local County Resource Conservation District.</p> <p>These should be in PDF, Word, and or Excel format.</p>

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR074

Name: Tatiana Friesen

WMP Category: Verification of Funding

Company: C2 Group

Data Request Date: 04/29/24

Due Date: 05/02/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
All WMP Initiatives	N/A	Verification of Funding	N/A	N/A	Documentation	From BVES's DR_002 Response with BVES_2023_Q4_Tables1-15_R0 Table 11 that includes the 2023 Projected CAPEX/OPEX costs, please provide the corresponding 2023 Actuals CAPEX/OPEX costs for each initiative in Excel format.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVE_DR075

Name: Barbara Tomajic

WMP Category: Initiative List - N/A Targets

Company: BVNA

Data Request Date: 05/20/24

Due Date: 05/16/24

Email: barbara.tomajic@bureauveritas.com

Phone #: (916)514-4511

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
NA	NA	2023 WMP Initiative List: Target	NA	NA	Revised Excel Spreadsheet	Please provide an updated initiative list and provide direction and/or explanation of those initiatives with Target Goals listed as "N/A". This will assist reviewers in developing future data requests.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVES_DR078

Name: Tatiana Friesen

WMP Category: Qualitative Goal/Target

Company: C2 Group

Data Request Date: 05/21/24

Due Date: 05/24/24

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management and Inspection	N/A	8.2.3.7 - VM_13 - Fire-resilient rights-of-way	N/A	N/A	Documentation	1. Per the Data Request DR_003 Response, provide the 2023 QA/QC Program documentation identified as "VM_13 Fire-Resilience Right-of-Ways QAQC Procedures R0"

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



BUREAU
VERITAS



DATA REQUEST

Data Request Number: BVE_DR079

Name: Tatiana Friesen

WMP Category: Verification of Funding

Company: C2 Group

Data Request Date: 06/03/2024

Due Date: 6/6/2024

Email: tatianaf@c2group.us

Phone #: (858) 231-1961

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Verification of Funding	N/A	All WMP Initiatives	N/A	N/A	Document	<p>IE is requesting additional information from BVES for the initiatives listed below and shown in the attached document named BVES - Data Request BVES_DR079_Attach - C2</p> <p>1. IE is requesting a detailed explanation for the following initiatives, which show the Expense Actual and Capital Actual being less than 100 percent of the planned budget.</p> <p>Please note that a separate explanation is requested for Expense underspend and Capital understand.</p> <ul style="list-style-type: none"> - GD_13 Installation of system automation equipment - GD_28 Asset inspections - VM_3 Vegetation Inspections - VM_11 Substation defensible space - GD_33 Equipment inspections, maintenance, and repair

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

Appendix D – SME Interview Summary

Item No.	2023 WMP Activities	Initiative Category	Initiative Name	SME Name, Title	Interview Date	Summary
1	Vegetation Management and Inspection	8.2.2.1 - VM_1 & VM_2	Detailed Inspections & Patrol Inspections - Circuit Miles Inspected	Jared Hennen; Wildfire Mitigation and Reliability Engineer	05/23/24	VM_1 & VM_2 sampling clarification to eliminate data requests time frame delays with a request of line miles for the initiatives. SME Jared mentions these tie into initiatives GD_1 & 2 and would be same data for GD_1, findings submitted for detailed inspections on grid side for veg mgmt. side bud did not have detailed patrol, VM_2 is vast and covers entire territory thus no sign off sheets were provided but will check.
2	Vegetation Management and Inspection & Grid Design, Operations and Maintenance	8.2.2.1 - VM_4 & 8.1.3.1 GD_29 - Large Volume Quantifiable Goal/Target - Not Field Verifiable	LiDAR Inspection - Circuit Miles Inspected	Jared Hennen; Wildfire Mitigation and Reliability Engineer	05/30/24	SME Jared provided an overview of the process handled by outside vendor, Davey. Data is collected in a 3-4 week time frame for deliverables ready between June-July in GIS format including encroachments and drone visuals. Data is then sent to contractors. Data is kept in MyRowKeepers and BV reviewers were given access to portal.

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

Appendix E – 2023 WMP Funding Verification Summary

Initiative Category	2023 Initiative Number	Initiative Name	2023 O&M Planned	2023 O&M Actual	2023 O&M Variance	2023 O&M Change (%)	2023 Cap. Planned	2023 Cap. Actual	2023 Cap. Variance	2023 Cap. Change (%)	2023 Total Planned	2023 Total Actual	2023 Total Change (%)
Overview of the Service Territory	ST_1	Environmental compliance and permitting	\$25	\$28	\$3	12%	\$0	\$0	\$0		\$25	\$28	\$3
Risk Methodology and Assessment	RMA_1	Technosylva Contractor. Program implemented and ongoing.	\$64	\$149	\$85	132%	\$0	\$0	\$0		\$64	\$149	\$85
Wildfire Mitigation Strategy Development	WMSD_1	Wildfire Mitigation Strategy Development	\$30	\$33	\$4	12%	\$0	\$0	\$0		\$30	\$33	\$4
Grid Design, Operations, and Maintenance	GD_1	Covered Conductor Replacement Project	\$0	\$0	\$0		\$4,786	\$11,630	\$6,844	143%	\$4,786	\$11,630	\$6,844
Grid Design, Operations, and Maintenance	GD_10	Bear Valley Solar Energy Project	\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0
Grid Design, Operations, and Maintenance	GD_11	Energy Storage Project	\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0
Grid Design, Operations, and Maintenance	GD_12	Substation Automation	\$0	\$0	\$0		\$654	\$676	\$22	3%	\$654	\$676	\$22
Grid Design, Operations, and Maintenance	GD_13	Switch and Field Device Automation	\$0	\$0	\$0		\$711	\$667	-\$44	-6%	\$711	\$667	-\$44
Grid Design, Operations, and Maintenance	GD_14	Capacitor Bank Upgrade Project	\$0	\$0	\$0		\$345	\$166	-\$179	-52%	\$345	\$166	-\$179
Grid Design, Operations, and Maintenance	GD_15	Fuse TripSaver Automation	\$0	\$0	\$0		\$198	\$219	\$21	11%	\$198	\$219	\$21
Grid Design, Operations, and Maintenance	GD_16	Server Room	\$0	\$0	\$0		\$127	\$24	-\$103	-81%	\$127	\$24	-\$103
Grid Design, Operations, and Maintenance	GD_17	Distribution Management Center	\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0
Grid Design, Operations, and Maintenance	GD_18	Line removals (in HFTD)	N/A	\$0			N/A	\$0				\$0	\$0
Grid Design, Operations, and Maintenance	GD_19	Tree Attachment Removal Project	\$0	\$0	\$0		\$606	\$699	\$93	15%	\$606	\$699	\$93
Grid Design, Operations, and Maintenance	GD_2	Radford Line Replacement Project	\$0	\$0	\$0		\$4,340	\$117	-\$4,223	-97%	\$4,340	\$117	-\$4,223

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

Initiative Category	2023 Initiative Number	Initiative Name	2023 O&M Planned	2023 O&M Actual	2023 O&M Variance	2023 O&M Change (%)	2023 Cap. Planned	2023 Cap. Actual	2023 Cap. Variance	2023 Cap. Change (%)	2023 Total Planned	2023 Total Actual	2023 Total Change (%)
Grid Design, Operations, and Maintenance	GD_20	Other grid topology improvements to mitigate or reduce PSPS events	\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0
Grid Design, Operations, and Maintenance	GD_21	BVPP Phase 4 Upgrade Project	\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0
Grid Design, Operations, and Maintenance	GD_22	Partial Safety and Technical Upgrades to Maltby Substation	\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0
Grid Design, Operations, and Maintenance	GD_23	Safety and Technical Upgrades to Lake Substation	\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0
Grid Design, Operations, and Maintenance	GD_24	Partial Safety and Technical Upgrades to Village Substation	\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0
Grid Design, Operations, and Maintenance	GD_25	Detailed Inspections	\$14	\$20	\$6	47%	\$0	\$0	\$0		\$14	\$20	\$6
Grid Design, Operations, and Maintenance	GD_26	Patrol Inspections	\$32	\$46	\$15	47%	\$0	\$0	\$0		\$32	\$46	\$15
Grid Design, Operations, and Maintenance	GD_27	UAV Thermography	\$56	\$57	\$0	1%	\$0	\$0	\$0		\$56	\$57	\$0
Grid Design, Operations, and Maintenance	GD_28	UAV HD Photography/Videography	\$56	\$22	-\$34	-61%	\$0	\$0	\$0		\$56	\$22	-\$34
Grid Design, Operations, and Maintenance	GD_29	LiDAR Inspection	\$58	\$70	\$12	22%	\$0	\$0	\$0		\$58	\$70	\$12
Grid Design, Operations, and Maintenance	GD_3	Minor Undergrounding Upgrades Projects	\$0	\$0	\$0		\$200	\$725	\$525	262%	\$200	\$725	\$525
Grid Design, Operations, and Maintenance	GD_30	3rd Party Ground Patrol	\$47	\$22	-\$25	-53%	\$0	\$0	\$0		\$47	\$22	-\$25
Grid Design, Operations, and Maintenance	GD_31	Intrusive Pole Inspections	\$19	\$20	\$1	6%	\$0	\$0	\$0		\$19	\$20	\$1
Grid Design, Operations, and Maintenance	GD_32	Substation inspections	\$275	\$845	\$570	207%	\$0	\$0	\$0		\$275	\$845	\$570
Grid Design, Operations, and Maintenance	GD_33	Equipment maintenance and repair	\$1,042	\$1,079	\$37	4%	\$0	\$0	\$0		\$1,042	\$2,158	\$1,116

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

Initiative Category	2023 Initiative Number	Initiative Name	2023 O&M Planned	2023 O&M Actual	2023 O&M Variance	2023 O&M Change (%)	2023 Cap. Planned	2023 Cap. Actual	2023 Cap. Variance	2023 Cap. Change (%)	2023 Total Planned	2023 Total Actual	2023 Total Change (%)
Grid Design, Operations, and Maintenance	GD_34	Asset management and inspection enterprise system(s)	\$56	\$100	\$44	79%	\$0	\$160	\$160		\$56	\$260	\$204
Grid Design, Operations, and Maintenance	GD_35	Asset Quality assurance/ quality control	\$20	\$22	\$2	12%	\$0	\$0	\$0		\$20	\$22	\$2
Grid Design, Operations, and Maintenance	GD_36	Asset Open work orders	\$17	\$19	\$2	12%	\$0	\$0	\$0		\$17	\$19	\$2
Grid Design, Operations, and Maintenance	GD_37	Equipment Settings to Reduce Wildfire Risk	\$5	\$6	\$1	12%	\$0	\$0	\$0		\$5	\$6	\$1
Grid Design, Operations, and Maintenance	GD_38	Grid Response Procedures and Notifications	\$9	\$10	\$1	12%	\$0	\$0	\$0		\$9	\$10	\$1
Grid Design, Operations, and Maintenance	GD_39	Personnel Work Procedures and Training in Conditions of Elevated Fire Risk	\$4	\$4	\$0	12%	\$0	\$0	\$0		\$4	\$4	\$0
Grid Design, Operations, and Maintenance	GD_4	Covered Conductor Replacement Project	\$0	\$0	\$0		\$2,051	\$4,984	\$2,933	143%	\$2,051	\$4,984	\$2,933
Grid Design, Operations, and Maintenance	GD_40	Asset Workforce Planning	\$6	\$7	\$1	12%	\$0	\$0	\$0		\$6	\$7	\$1
Grid Design, Operations, and Maintenance	GD_5	Radford Line Replacement Project	\$0	\$0	\$0		\$1,860	\$50	-\$1,810	-97%	\$1,860	\$50	-\$1,810
Grid Design, Operations, and Maintenance	GD_6	Evacuation Route Hardening Project	\$0	\$0	\$0		\$816	\$406	-\$411	-50%	\$816	\$406	-\$411
Grid Design, Operations, and Maintenance	GD_7	NA	N/A	\$0			N/A	\$0				\$0	\$0
Grid Design, Operations, and Maintenance	GD_8	Traditional overhead hardening	\$0	\$0	\$0		\$500	\$1,318	\$818	164%	\$500	\$1,318	\$818
Grid Design, Operations, and Maintenance	GD_9	Emerging grid hardening technology installations and pilots	\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0
Vegetation Management and Inspection	VM_1	Detailed Inspections	\$14	\$20	\$6	47%	\$0	\$0	\$0		\$14	\$20	\$6
Vegetation Management and Inspection	VM_10	Fall-in mitigation	\$283	\$296	\$13	5%	\$0	\$0	\$0		\$283	\$296	\$13

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Initiative Category	2023 Initiative Number	Initiative Name	2023 O&M Planned	2023 O&M Actual	2023 O&M Variance	2023 O&M Change (%)	2023 Cap. Planned	2023 Cap. Actual	2023 Cap. Variance	2023 Cap. Change (%)	2023 Total Planned	2023 Total Actual	2023 Total Change (%)
Vegetation Management and Inspection	VM_11	Substation defensible space	\$15	\$14	-\$1	-7%	\$0	\$0	\$0		\$15	\$14	-\$1
Vegetation Management and Inspection	VM_12	High-risk species	\$283	\$306	\$23	8%	\$0	\$0	\$0		\$283	\$306	\$23
Vegetation Management and Inspection	VM_13	Fire-resilient rights-of-way	\$14	\$14	\$0	3%	\$0	\$0	\$0		\$14	\$14	\$0
Vegetation Management and Inspection	VM_14	Emergency response vegetation management	\$25	\$29	\$4	16%	\$0	\$0	\$0		\$25	\$29	\$4
Vegetation Management and Inspection	VM_15	Vegetation management enterprise system	\$21	\$26	\$5	22%	\$0	\$0	\$0		\$21	\$26	\$5
Vegetation Management and Inspection	VM_16	Vegetation Management Quality assurance / quality control	\$46	\$53	\$7	16%	\$0	\$0	\$0		\$46	\$53	\$7
Vegetation Management and Inspection	VM_17	Vegetation Management Open work orders	\$31	\$35	\$4	13%	\$0	\$0	\$0		\$31	\$35	\$4
Vegetation Management and Inspection	VM_18	Vegetation Management Workforce planning	\$6	\$7	\$1	12%	\$0	\$0	\$0		\$6	\$7	\$1
Vegetation Management and Inspection	VM_2	Patrol Inspections	\$32	\$46	\$15	47%	\$0	\$0	\$0		\$32	\$46	\$15
Vegetation Management and Inspection	VM_3	UAV HD Photography/Videography	\$58	\$55	-\$3	-5%	\$0	\$0	\$0		\$58	\$55	-\$3
Vegetation Management and Inspection	VM_4	LiDAR Inspection	\$58	\$70	\$12	22%	\$0	\$0	\$0		\$58	\$70	\$12
Vegetation Management and Inspection	VM_5	3rd Party Ground Patrol	\$47	\$22	-\$25	-53%	\$0	\$0	\$0		\$47	\$22	-\$25
Vegetation Management and Inspection	VM_6	Substation inspections	\$4	\$5	\$1	27%	\$0	\$0	\$0		\$4	\$5	\$1
Vegetation Management and Inspection	VM_7	Pole clearing	N/A	\$0			N/A	\$0				\$0	\$0
Vegetation Management and Inspection	VM_8	Wood and slash management	\$417	\$454	\$36	9%	\$0	\$0	\$0		\$417	\$454	\$36
Vegetation Management and Inspection	VM_9	Clearance	\$1,762	\$1,935	\$174	10%	\$0	\$0	\$0		\$1,762	\$1,935	\$174
Situational Awareness and Forecasting	SAF_1	Advanced weather monitoring and weather stations	\$7	\$9	\$1	21%	\$0	\$0	\$0		\$7	\$9	\$1

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Initiative Category	2023 Initiative Number	Initiative Name	2023 O&M Planned	2023 O&M Actual	2023 O&M Variance	2023 O&M Change (%)	2023 Cap. Planned	2023 Cap. Actual	2023 Cap. Variance	2023 Cap. Change (%)	2023 Total Planned	2023 Total Actual	2023 Total Change (%)
Situational Awareness and Forecasting	SAF_2	Install Fault Indicators	\$0	\$0	\$0		\$360	\$20	-\$340	-94%	\$360	\$20	-\$340
Situational Awareness and Forecasting	SAF_3	Online Diagnostic System	\$0	\$0	\$0	0%	\$78	\$24	-\$54	-69%	\$78	\$24	-\$54
Situational Awareness and Forecasting	SAF_4	HD ALERTWildfire Cameras	\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0
Situational Awareness and Forecasting	SAF_5	Weather forecasting	\$51	\$70	\$19	36%	\$0	\$0	\$0		\$51	\$70	\$19
Situational Awareness and Forecasting	SAF_6	Fire potential index	\$39	\$58	\$19	49%	\$0	\$0	\$0		\$39	\$58	\$19
Emergency Preparedness	EP_1	Emergency preparedness plan	\$5	\$5	\$1	12%	\$0	\$0	\$0		\$5	\$5	\$1
Emergency Preparedness	EP_2	External collaboration and coordination	\$21	\$23	\$2	8%	\$0	\$0	\$0		\$21	\$23	\$2
Emergency Preparedness	EP_3	Public emergency communication strategy	\$4	\$5	\$1	12%	\$0	\$0	\$0		\$4	\$5	\$1
Emergency Preparedness	EP_4	Preparedness and planning for service restoration	\$6	\$6	\$1	12%	\$0	\$0	\$0		\$6	\$6	\$1
Emergency Preparedness	EP_5	Customer support in wildfire and PSPS emergencies	\$3	\$4	\$0	12%	\$0	\$0	\$0		\$3	\$4	\$0
Community Outreach and Engagement	COE_1	Public outreach and education awareness program	\$90	\$91	\$1	1%	\$0	\$0	\$0		\$90	\$91	\$1
Community Outreach and Engagement	COE_2	Engagement with access and functional needs populations	\$30	\$33	\$3	11%	\$0	\$0	\$0		\$30	\$33	\$3
Community Outreach and Engagement	COE_3	Collaboration on local wildfire mitigation planning	\$23	\$23	\$0	1%	\$0	\$0	\$0		\$23	\$23	\$0
Community Outreach and Engagement	COE_4	Best practice sharing with other utilities	\$15	\$17	\$2	12%	\$0	\$0	\$0		\$15	\$17	\$2